

Cranbourne West Primary School

CCTV POLICY

RATIONALE

This Policy explains the management, operation and use of the closed circuit television (CCTV) system at Cranbourne West Primary School and should be read in conjunction with the Department's CCTV policy.

SCOPE

This policy applies to the installation of CCTV cameras on school grounds and the use and disclosure of any footage produced by those cameras.

This policy is consistent with:

- Victorian government [Schools' Privacy Policy](#) (applies to all Victorian government schools)
- the Department's [Security Risk Management](#) policy
- Victorian privacy law

IMPLEMENTATION

Schools have an obligation to ensure the school environment is safe and secure, and fulfil duty of care to students, staff and visitors. The CCTV system exists to assist our school to fulfil these obligations and to prevent and manage other inappropriate behaviour on school grounds.

CCTV provides enhanced capability to protect our school's assets against vandalism and theft. CCTV strengthens our school's security by providing an appropriate level of surveillance on school grounds and assists our school to take all reasonable steps to prevent reasonably foreseeable harm on school premises (duty of care). The presence of CCTV cameras deters misconduct and inappropriate behaviour and reassures students, staff and visitors that they are protected when on school grounds.

This policy describes how our CCTV system does this, consistent with Victorian privacy law.

Use of CCTV

Consistent with our school's obligations set out above, Cranbourne West Primary School may use CCTV cameras to:

- prevent and verify incidents involving
 - criminal behaviour – of anyone on school grounds
 - staff misconduct
 - other inappropriate behaviour – including of students, staff, visitors or members of the public. For example, this means the school may use CCTV footage of incidents to help inform decisions about student management
- verify other incidents – involving students, staff and visitors (e.g. incidents in which a person has sustained injury, loss or damage on school premises)
- to provide the principal with visual coverage during emergencies

CCTV cameras are NOT:

- hidden or covert
- located in private areas such as toilets, changing rooms or staff rooms
- used to monitor student or staff work performance

Location of CCTV cameras in our school

In our school, CCTV cameras are located in:

- main building school entrances
- entry foyer
- security area of admin office
- main travel areas around the school
- car park
- school hall/Gym
- ovals areas x 3
- playgrounds and quadrangle areas x 5

A notice is located near each CCTV camera (where practical) or at school entrances, which alerts people to the presence of the camera and this CCTV Policy.

Access to CCTV footage

CCTV footage is only accessed for the purposes set out in this policy (see 'Use of CCTV footage') and only by the following people:

1. the principal or nominee, including people explicitly authorised by the principal

2. central and regional Department staff, when required to assist the school for an above purpose
3. any other people permitted by law.

Showing footage to staff, students and/or their parents involved in incidents

When using CCTV for the purposes listed in this policy under the heading 'Use of CCTV' and only when appropriate, the principal may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents.

This means that any person on school premises may be captured on CCTV footage of an incident that the principal may subsequently show to staff, students and/or their parents.

The school cannot give copies of CCTV footage to staff, students, parents or any other parties. Any requests for a copy of CCTV footage must be made to the Department's Freedom of Information Unit, as set out below.

Managing and securing the CCTV system

The principal or their nominee is responsible for managing and securing the CCTV system including:

1. operation of the CCTV system and ensuring it complies with this policy
2. considering the appropriate location and use of cameras and method for storing CCTV footage
3. maintaining and upgrading cameras when required.

Ownership of CCTV footage

The Department of Education and Training (the Department) owns our school's CCTV systems and CCTV footage.

Disclosure of CCTV footage

Our school may only disclose CCTV footage externally (i.e. external to the Department) as described in this policy or otherwise when permitted by law.

Storage of Footage

CCTV footage is kept for no more than 31 days. If our school has not used CCTV footage in any of the ways set out above, and there has been no request to view or access footage during this period, the footage is deleted.

Where CCTV footage has been used to verify an incident or where it is required to be retained for legal reasons, our school will manage and securely retain the footage in accordance with records management requirements as issued by the Public Records Office of Victoria.

Access to information held about you

To access information our school holds about you (on behalf of the Department), including any CCTV footage, please contact:

Freedom of Information Unit
Department of Education and Training
GPO Box 4367
MELBOURNE VIC 3001
Email: foi@edumail.vic.gov.au

FURTHER INFORMATION AND RESOURCES

- School Policy and Advisory Site: [Security Risk Management](#)
- School Policy and Advisory Site: [Photographing and Filming Students](#)
- [Schools' Privacy Policy](#)

EVALUATION

This policy will be reviewed as required by developments in relevant legislation or DET guidelines.

This policy will be reviewed every three years as part of the policy review cycle.

Department of Education and Training

CCTV Policy

RATIONALE

The following policy outlines the requirements relating to the design, installation and responsible management and use of closed-circuit television (CCTV) systems in Victorian government schools. Schools must implement and operate CCTV systems in accordance with this policy.

SUMMARY

- This policy outlines requirements for design, installation, management, and responsible use of CCTV in Victorian government schools.
- CCTV is one security measure that schools can use to support a safe and secure school environment.
- CCTV can deter inappropriate behaviour such as vandalism and theft, and also provide evidence to verify incidents.
- Approval to install CCTV in Victorian government schools must be sought from the Security Unit.
- Resources are provided to support schools to install, manage and use CCTV effectively (following approval), including:
 - installation and maintenance checklists
 - recommended products, installers, and technical specifications
 - advice on signage, privacy, and communication.

DETAILS

The installation and use of CCTV systems within schools can support and enhance a school's ability to provide a safe and secure school environment for students, staff and visitors. Schools must ensure that privacy is considered in the installation and use of CCTV systems.

Installing CCTV systems on school grounds can support schools and the Department by:

- acting as deterrent and reducing the likelihood of vandalism and theft
- deterring misconduct and inappropriate behaviour
- helping to verify incidents on school grounds to support an evidence-based response
- reassuring students, staff and visitors that they are protected when on school grounds.

Installation of CCTV systems

Approval process for installation of CCTV systems

The installation of CCTV at any school must be approved by the Manager, Security Unit, DET Security and Emergency Management Division.

The Security Unit maintains a range of supporting documents to help guide schools through the planning, design and implementation of a CCTV system, including:

- the approval process
- a list of recommended installers.

To initiate the approval and planning process for the implementation of a CCTV system, schools must submit the [CCTV system expression of interest form \(DOCX\)](#) (staff login required) to the Manager, Security Unit by email: school.security@education.vic.gov.au

On receipt of the form, the Security Unit will assess the request and work with the school to create an initial design to ensure the school's needs are met.

This design can then be used to engage contractors for quoting purposes based on the Department's list of recommended installers and as part of an approved procurement process.

Prior to a confirmation of approval notification being provided to the school by the Manager, Security Unit, the school must provide:

- a final marked-up site plan (this can be created by the installer) indicating:
 - the location of CCTV camera and related equipment
 - supporting signage
- a copy of the wording of the supporting signage being installed
- a signed copy of the [CCTV policy acknowledgement \(DOCX\)](#) (staff login required).

The Security Unit staff are available to support this process. Schools may also refer to the [CCTV implementation checklist \(DOCX\)](#) (staff login required).

Consultation

Before deciding to install a CCTV system, the principal must consult with and take into account the views of the school council. The principal may also wish to extend consultation to other members of the school community including staff, students and parents.

Decision to install

The final decision to install a CCTV system rests with the principal (subject to the approval of the Manager, Security Unit).

If, following consultation, the principal decides to install a CCTV system, the school must inform the school community of the intention to install a CCTV through appropriate channels such as a:

- newsletter article
- statement on the school website
- posted material within the school grounds.

For sample content to adapt for the school community refer to: [CCTV installation information for school community – sample content \(DOCX\)](#) (staff login required).

Design and specification

The [CCTV installation guiding principles \(DOCX\)](#) (staff login required) provide minimum standards for Victorian government school CCTV systems and, when provided to members of the Department's approved list of suppliers, will help to ensure that quotes are accurate and can be easily compared in order to determine the most appropriate quote for the school.

The Security Unit can advise schools on the scope, design and system requirements of the proposed CCTV system and will approach the task from a risk management perspective ensuring that the selected CCTV system is both effective and value-for-money.

Location of CCTV cameras

The principal, in collaboration with the Security Unit, is responsible for determining the appropriate location of cameras in accordance with this policy.

Prohibited locations of CCTV cameras

Schools must not install CCTV cameras in the following areas:

- toilets
- change rooms
- dressing rooms
- showers
- other areas where individual privacy is paramount.

Covert surveillance

Schools are not permitted to undertake their own covert (or hidden) surveillance using CCTV systems.

Enquiries regarding installation of CCTV cameras for the purpose of covert surveillance must be made to Manager, Security Unit, who will instigate a broader collaborative approach involving Legal Division and the Privacy Branch to determine if a covert CCTV system installation is the most appropriate course of action and complies with Victoria laws.

The Department will only consider allowing CCTV installation for the purpose of covert surveillance in exceptional circumstances and when the installation and surveillance complies with Victorian laws.

Signage

All schools have a responsibility to ensure there is signage that notifies staff, students, visitors, contractors and/or the general community that CCTV is in operation.

Signage must be:

- situated at all site entry and exit points (at a minimum)
- easily understood by all parties, including people from non-English speaking backgrounds – signs should include a mix of text and symbols

- clearly visible, distinctive and located in areas with good lighting, placed in normal eye range and large enough so that any text can be read easily
- checked regularly for damage/theft/vandalism.

The signage should be supplied by the provider as part of the installation process.

CCTV privacy notice

In addition to signage, schools must have a CCTV privacy notice either on their website or other online school community information platform.

The privacy notice must:

- explain the purpose of the CCTV system
- provide the location of CCTV cameras (either by listing the locations or providing a map)
- explain how to request a record of any footage
- provide a link to this policy for further information on how the school may use the CCTV system and who may access the footage.

A [template privacy notice \(DOCX\)](#) (staff login required) has been developed to support schools with this process.

Management and operation of CCTV

The principal is responsible for ensuring the CCTV system is managed and operated in accordance with this policy and for keeping a record of the staff members nominated to access the system.

All school staff with responsibility for using and managing the CCTV systems must be:

- appropriately trained in using and managing the CCTV system and made aware of the requirements contained in this policy
- made aware that access to live and recorded footage may be subject to review by the Department and they may be required to justify any access to footage.

Access to CCTV footage

CCTV footage must only be accessed for the purposes set out in this policy (refer to 'Use of CCTV footage' below) and only by the following people:

- the principal and staff nominated by the principal
- authorised staff of the Department's Security and Emergency Management Division (including via remote access)
- any other people permitted or required by law.

Schools must record each occasion CCTV footage is accessed in the [CCTV recorded and viewed footage register \(DOCX\)](#) (staff login required).

Use of CCTV footage

CCTV footage may only be used for the following purposes.

Live CCTV footage

Live CCTV footage may be used by authorised school or Department staff to:

- provide situational awareness of incidents that pose a risk to health or safety of the school community or following a school security alarm activation or other trigger
- monitor for activities that pose a risk to the health or safety of the school community or to property where:
 - there is a reasonable belief that an incident will occur
 - monitoring the CCTV live footage will help to identify the persons involved and/or support the school or Department to reduce the risk of the incident occurring or reoccurring

Note: Schools must contact the Security Unit for advice before monitoring CCTV footage in this manner
- provide the Department with visual coverage during emergencies.

Recorded CCTV footage

Recorded CCTV footage may be used by authorised school or Department staff to:

- prevent, verify and investigate incidents involving:
 - criminal behaviour of anyone on school grounds
 - staff misconduct
 - other inappropriate behaviour – including of students, staff, visitors or members of the public. For example, this means the school may use CCTV footage of incidents to help inform decisions about student management
- verify and investigate other incidents involving students, staff or visitors (for example, incidents in which a person has sustained injury, loss or damage on school premises)
- support school leadership with incident review and debriefing.

The Employee Conduct Branch must be consulted prior to the use of CCTV footage for staff misconduct or discipline related matters.

Prohibited uses

In addition to the prohibited locations of CCTV cameras above, CCTV footage must not be used by schools:

- to monitor non-school facilities or public places
- to monitor staff performance
- for the purpose of covert surveillance except in accordance with this policy – refer to the heading 'Covert surveillance' above.

Disclosure of CCTV footage to external parties

Live or recorded CCTV footage may only be disclosed externally (external to the Department) as described in this policy or otherwise when permitted or required by law.

Examples of when CCTV footage may be disclosed externally include:

- live or recorded footage disclosed to law enforcement agencies where required or permitted by law
- when required under a court order.

Schools may contact the Department's Privacy Unit and/or Legal Division for advice when they receive a request from an external party for access to live CCTV footage or for copies of recorded CCTV footage to help determine if the footage can be shared with the party or if they need to be referred to the Department's Freedom of Information Unit.

Privacy Unit

- Phone [03 8688 7967](tel:0386887967)
- Email privacy@education.vic.gov.au

Legal Division

- Phone [03 963 3146](tel:039633146)
- Email legal.services@education.vic.gov.au

Showing footage to students, their parents and staff involved in incidents

When using CCTV for the purposes listed in this policy under the heading 'Use of CCTV', the principal may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents, provided:

- the principal considers it appropriate and necessary in order to support parents to understand the specifics of an incident that has taken place so they can provide appropriate support to their child or for a staff member to better understand an incident
- it would not cause a health, wellbeing or safety risk to any other person and
- it would not be an unreasonable intrusion into another person's privacy.

Schools may contact the Privacy Team or Legal Division for further advice on when it may be appropriate and lawful to show students, parents, or staff CCTV footage.

The school cannot give copies of CCTV footage to staff, students or parents. Any parent, student or staff request for a copy of CCTV footage must be made to the Department's Freedom of Information Unit.

Freedom of Information Unit

- Phone [03 7022 0078](tel:0370220078)
- Email foi@education.vic.gov.au

Recorded material – storage and retention

The principal or their nominated staff member is responsible for ensuring CCTV recorded images are stored securely and retained for the required period of time.

CCTV footage must be securely retained for a minimum of 31 days.

If the CCTV footage has not been accessed or used in the ways set out above and there has been no request to view or otherwise access the footage, the footage may be deleted after 31 days. The number of days for system retention of footage is determined during the installation of a CCTV system.

Where the CCTV footage has been accessed or there has been a request to access, schools must manage these records in accordance with the retention requirements set out in the Department's policy: [Records Management – School Records](#).

Ownership of CCTV systems and footage

The Department owns school CCTV systems and footage.

Maintenance of CCTV systems

Principals are encouraged to review arrangements for school management of CCTV systems, including confirming that the equipment is working effectively, on a termly basis. Where system issues are discovered, schools are encouraged to engage an approved contractor to rectify these issues. For a detailed checklist that can be used for this review refer to: [CCTV maintenance checklist \(DOCX\)](#) (staff login required).

Schools are also encouraged to have their recording equipment checked on an annual basis by an approved contractor (from the Department's list of approved suppliers) to ensure the system is maintained in good working order.

Complaints

Parent complaints relating to CCTV systems should be managed in accordance with the Department's [Parent Complaints Policy](#) and the school's own parent complaint policy and procedures. The Security Unit and the Privacy Unit can be contacted for advice and support in managing parent complaints in these circumstances.

Complaints from other members of the community can be managed by the school, with support and advice from the Security Unit or can be referred directly to the Security Unit for response.

If referred on, the Manager, Security Unit, must provide a written report to the Director, Security and Emergency Management Division, highlighting key findings and appropriate solutions within an agreed timeframe not to exceed 4 weeks. The Director, Security and Emergency Management Division, will take action as appropriate within departmental guidelines, and then advise the complainant

Definitions

CCTV footage

Closed-circuit television (CCTV) refers to broadcasts transmitted to a limited number of closed monitor/s for the purpose of video surveillance. The video is often recorded for set periods of time and the footage used for evidence.

Incident

Incident is defined in [Reporting and Managing School Incidents \(including emergencies\)](#).

Remote access

The ability to access the CCTV system remotely (while not on location).

Situational awareness

The state of knowing what has occurred and what is currently happening in an incident or emergency – based on the best available knowledge, information, and data.

Related policies

- [Crime Prevention in Schools](#)
- [Police – Department Protocol on Reporting Criminal Activity](#)
- [Privacy and Information Sharing](#)
- [Reporting and Managing School Incidents \(including emergencies\)](#)
- [Schools' Privacy Policy](#)

Relevant legislation

- [Ministerial Order 1280 Constitution of Government School Councils 2020 \(DOCX\)](#)
 - [Privacy and Data Protection Act 2014 \(Vic\)](#)
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Guidance

Resources

- [CCTV implementation checklist \(DOCX\)](#) (staff login required)
- [CCTV installation guiding principles \(DOCX\)](#) (staff login required)
- [CCTV installation information for school community – sample content \(DOCX\)](#) (staff login required)
- [CCTV maintenance checklist \(DOCX\)](#) (staff login required)
- [CCTV policy acknowledgement \(DOCX\)](#) (staff login required)
- [CCTV privacy notice template \(DOCX\)](#) (staff login required)
- [CCTV recorded and viewed footage register \(DOCX\)](#) (staff login required)
- [CCTV system expression of interest form \(DOCX\)](#) (staff login required)