



## CCTV Video & Audio Surveillance Policy

### 1. Policy Statement

Reference Document Only

### 2. Revision Record

Document Title	CCTV Video & Audio Surveillance Policy						
Document Type	Policy						
Document Date	June 2020						
Process Owner	South Australian Commission for Catholic Schools (SACCS)						
Adoption Authority	N/A						
Review Date	June 2022						
Policy Distribution	Teams (Staff)	✓	Website (Public)	✓	SEQTA (Parents / Students)		Boardtrac (Directors)
Revision History	<b>Edition Number</b>	<b>Date</b>		<b>Description of change</b>			
	1.0	Feb 2021		Policy adopted			
	2.0	2024		Changed to Reference Document Only			

# CCTV Video & Audio Surveillance

## Policy

Version 1.0



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## 1 Purpose

To establish a policy for the use of CCTV video and audio surveillance (“Surveillance”) optical or video surveillance devices (“Surveillance Devices”) in Catholic Schools in South Australia (CESA).

To support compliance with the Surveillance Devices Act and protect the lawful interests of Schools (for example, use of Surveillance to monitor incursions onto, and damage to School property, and as a contributor to staff and student safety).

## 2 Scope of Policy

This policy applies to all Catholic schools in South Australia.

## 3 Requirements of Surveillance Devices Act

The Surveillance Devices Act prohibits the installation, use and maintenance of Surveillance Devices. A range of exceptions to the prohibition apply.

Relevant exceptions are that:

- (a) the use of a Surveillance Device must be reasonably necessary to protect the lawful interests of the School; or
- (b) the use of a Surveillance Device must be in the public interest.

Schools will normally be able to satisfy the exception allowing Surveillance for the protection of lawful interests. Protection of lawful interests would include protection of School property and the safety of students and staff.

The Surveillance Devices Act also restricts the communication or publication of information or material derived from use of Surveillance Devices. Use and disclosure must only be made in limited circumstances including disclosure:

- (i) to a person (“participant”) who participated in the recorded activity or conversation; or
- (ii) with the consent of each participant; or
- (iii) to an officer of an investigating agency for the purposes of a relevant lawful investigation; or
- (iv) in a situation where a person is subjected to violence or there is an imminent threat of violence.

## 4 Policy

It is SACCS' policy that the use of Surveillance in a School environment is to be employed in the following consistent manner:

- Surveillance is to be conducted in accordance with the law for the purposes of monitoring and recording activity within the physical School boundary and public places around the perimeter of School grounds;
- Use of a Surveillance Device must be to protect the lawful interests of the School or in the public interest;
- Surveillance is to be conducted in the interests of protection of school property, safety and as a deterrent to undesirable behaviour by persons on or near School grounds;
- The collection, storage and use of personal information collected through the use of Surveillance will comply with the Australian Privacy Act (Cth) and in accordance with the Australian Privacy Principles (APPs);
- Implementation of Surveillance infrastructure in a School may be approved by the School Principal under the following conditions:
  - A formal proposal containing all pertinent detail is prepared;
  - A Privacy Impact Assessment (PIA) is conducted by the School, and approved by the Principal;
  - Equipment proposed meets SACCS approved standards as exists at the time of purchase and installation.
- In the case of established Surveillance infrastructure, Schools are required to conduct a Privacy Impact Assessment to ensure continued compliance with the Australian Privacy Act (Cth);
- Cabling and cable protection conform to AUSTEL technical standards as they exist at the time;
- Video or audio traffic must be carried by separate cable or virtual private network to that of the Schools local area network;
- Video data in transit is to be encrypted end to end with industry standard encryption in accordance with SACCS approved standards;
- Stored video or audio (data at rest) is to be encrypted with industry standard encryption technology in accordance with SACCS approved standards;
- Access to the live feed or recorded video or audio requires written permission from the Principal observing the principle of access of least privilege and associated with the lawful interests of the school. Access is to be strictly managed, with all access logged for audit purposes;
- The School will ensure access to the video and/or audio equipment used for recordings is restricted to staff required to manage the infrastructure;
- Video and audio recordings are kept for a designated period before being securely destroyed, in accordance with privacy principles and following the procedures developed by the School;
- For all proposed and existing Surveillance installations, the School will undertake and document a risk analysis, and develop a policy and procedures to regulate access to content created using Surveillance;

School policy and procedures addressing Surveillance are to specify access provisions in accordance with the Surveillance Devices Act 2016 (SA). Disclosure of content to be prohibited with exceptions for the following:

- disclosure to the police or officers of an investigating agency for the purposes of a relevant lawful investigation;
- disclosure authorised by a judge;
- disclosure to the person who was a party to the activity or their parent/guardian;
- disclosure with consent of each person involved in the recorded activity;
- disclosure in relation to a situation in which a person is being subjected to violence or there is an imminent threat of violence to a person;
- Students, staff, parents, guardians, and/or other adults responsible for students at the School are to be informed that video surveillance will be in operation;
- Clear and visible signage must be placed at appropriate entry points and throughout the School to ensure all persons entering or in proximity to the School grounds can be reasonably expected to be aware that Surveillance is in operation.

## 5 Definitions

**CCTV** – means Closed Circuit Television and in the context of this document includes all equipment used to record and store video and/or audio for the purposes of surveillance and protection of School property.

**CEO** - means either or both of the Adelaide and Port Pirie Catholic Education Offices, as the context permits.

**CESA** - means Catholic Education South Australia, including any School or the CEO, as the context may permit.

**ICT** - Information and Communications Technology is a term that includes any facilities used to compute, communicate and to store information electronically. This may include and is not limited to desktop, laptop, and tablet computers, computer servers, electronic storage devices, network and telecommunications equipment and associated software.

**SACCS** - South Australian Commission for Catholic Schools (SACCS).

**School** - means any catholic school in the Archdiocese of Adelaide or the Diocese of Port Pirie.

**Staff** - means any employee of CESA, including contractors, casual staff and outsource provided staff with contact with CESA provided ICT facilities.

**Surveillance** - means audio or optical surveillance and includes the use of CCTV.

**Surveillance Device** - means any type of device used for Surveillance and includes CCTV.

## 6 Related documents/links

The following documents are to be read in conjunction with this policy.

- SACCS Information Security Policy;
- SACCS Information Security Framework;
- SACCS Privacy Policy;
- School and CEO policies and procedures as appropriate.
- SACCS Data Encryption Guideline & Standard.

## 7 Responsibility for implementation, monitoring, and continual improvement

Responsibility for implementation, monitoring and review of the policy is vested at the level appropriate to the following roles:

Catholic Education Offices	Catholic Schools
Assistant Director Information and Communication Technology (Chief Information Officer)	School Board (or Equivalent)
	Principal
	Designated school personnel.

## 8 Revision Record

Document Title	SACCS CCTV Video Surveillance Policy
Document Type	Policy
Document Date	June 2020
Revision Number	V1.0
Policy Owner	Assistant Director Information and Communication Technology
Contact	Assistant Director Information and Communication Technology (08) 8301 6600
Approval Authority	SACCS
Review Date	June 2022
Revision History	June 2020: Document inception