

CCTV Video Surveillance Policy



LORETO
COLLEGE

www.loreto.sa.edu.au

Loreto Mission and Values

Mary Ward was an inspirational leader, believing passionately that ‘women, in time to come, will do much’ and that a strong education focused on girls and women would create ‘seekers of truth and doers of justice’. All Loreto schools in Australia share the same set of values: **freedom, justice, sincerity, verity** and **felicity**. These values are at the heart of our educational philosophy; they shape our identity and how we interact with others through our words, thoughts and actions.

Aim

The aim of the CCTV Video Surveillance Policy is to ensure the safe and correct use of video surveillance (“Surveillance”) and optical or video surveillance devices (“Surveillance Devices”) at Loreto College.

This policy aims to support compliance with the Surveillance Devices Act whilst protecting the lawful interests of Loreto College (for example, use of Surveillance to monitor incursions onto, and damage to College property, and as a contributor to staff, student and visitor safety).

Scope

The Policy applies to Loreto College.

Related Documents

- SACCS CCTV Video and Audio Surveillance Policy
- Loreto College Privacy Policy
- Surveillance Devices Act 2016

Definitions

- **CCTV** – means Closed Circuit Television and in the context of this document includes all equipment used to record and store video for the purposes of surveillance and protection of College property, students and staff.
- **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.
- **Staff** - means any employee of Loreto College, including contractors, casual staff, visitors and outsource provided staff with contact with Loreto College provided ICT facilities.
- **Designated Loreto College Staff** - means that information collected via CCTV footage will be accessible only by the Principal, Chief Operating Officer and Assistant Principal: Wellbeing and Engagement.
- **Students** - means any enrolled student/child at the College or Early Learning Centre.
- **Surveillance** - means optical surveillance and includes the use of CCTV.
- **Surveillance Device** - means any type of device used for Surveillance and includes CCTV.

Requirements of the 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.

Loreto College will be able to satisfy the exception allowing Surveillance for the protection of lawful interests. Protection of lawful interests would include protection of College 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

Process

The use of Surveillance at Loreto College 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 College boundary and public places around the perimeter of the College grounds;
- Use of a Surveillance Device must be to protect the lawful interests of Loreto College or in the public interest;
- Surveillance is to be conducted in the interests of protection of College property, safety and as a deterrent to undesirable behaviour by persons on or near Loreto College 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 Principal under the following conditions:
 - A formal proposal containing all pertinent detail is prepared;
 - Review and update of the relevant Privacy Policy and other policies;

- In the case of established Surveillance infrastructure, Loreto College is 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 traffic must be carried by separate cable or virtual private network to that of the College's local area network;
- Video data in transit is to be encrypted end to end with industry standard encryption;
- Stored video (data at rest) is to be encrypted with industry standard encryption technology;
- Access to the live feed or recorded video (except for designated Loreto College Staff) requires written permission from the Principal observing the principle of access of least privilege and associated with the lawful interests of the College. Access is to be strictly managed, with all access logged for audit purposes;
- Designated Loreto College Staff will sign a Video Surveillance Acknowledgement Form to ensure the lawful interests of the College are maintained;
- The College will ensure access to the video equipment used for recordings is restricted to staff required to manage the infrastructure;
- Video recordings are kept for a designated period before being securely destroyed, in accordance with privacy principles and following the procedures developed by the College;
- For all proposed and existing Surveillance installations, the College will undertake and document a risk analysis, and develop a policy and procedures to regulate access to content created using Surveillance;

The College 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 Loreto College are to be informed that video surveillance will be in operation;
- Clear and visible signage is to be placed at appropriate entry points and throughout the College to ensure all persons entering or in proximity to the College grounds can be reasonably expected to be aware that Surveillance is in operation. The College has in place clear and visible signage in the following locations:

- Performing Arts Centre
- Talbot Grove Senior School Entrance
- Talbot Grove Junior School Entrance
- Early Learning Centre Entrance/Junior School Entrance

Video Surveillance Acknowledgement Form

Purpose and Scope

The Video Surveillance Acknowledgement Form regulates the use of the CCTV Surveillance Cameras to protect the legal and privacy interest of Loreto College.

This document applies to Designated Loreto College Staff in the use of CCTV surveillance devices and monitoring and/or recording activity.

Access and Use

1. Only Designated Loreto College Staff will have access to surveillance camera data.
2. Appropriate use and confidentiality must be maintained by the Designated Loreto College Staff.
3. When an incident is suspected to have occurred, only the Designated Loreto College Staff may review images from surveillance camera data.
4. Designated Loreto College Staff are prohibited from using or disseminating information acquired from the CCTV cameras, except for official purposes. All information and/or observations made in the use of CCTV cameras are considered confidential and can only be used for official and lawful investigations.
5. All requests to release surveillance records must be authorised by the Principal or her delegate.

By signing the Video Surveillance Acknowledgement Form, you acknowledge that you understand the CCTV Surveillance Policy.

Name:

Signature:

Date:

Document Control

Policy Title	CCTV Video Surveillance Policy
Ratified by Executive	2023
Policy due for review	2025