

CLOSED CIRCUIT TELEVISION (CCTV) POLICY



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STRATEGIC FRAMEWORK

Christian Foundation – Gospel of Christ, faithful lives, advancing the kingdom

Nurturing Students – Teaching children, developing faith and Christian character

Community – Working together, partnering with parents, constantly improving

Leadership and Governance – Strong governance, servant leadership, honour authority

Stewardship – Caring, ethical, stable

RATIONALE

As a Christian community, we are given the task to act as good stewards of the things that are entrusted to us. We need to take reasonable steps to protect equipment and people from harm. In doing so we should take care that the actions we take to care for things does not inappropriately damage relationships or cause us to retreat from interaction with our surrounding community and develop a protectionist attitude. A balance is needed.

AIMS

This policy seeks to establish guidelines that will allow reasonable monitoring of the college equipment and interactions as safety considerations without sacrificing privacy of individuals or compromising reasonable trust. Specific monitoring activities may include:

- monitoring areas of the college to gain data to analyse situations to assist student's in their interactions
- gather evidence to assist in following up of incidents once they have occurred
- act as a deterrent to inappropriate behaviour by students and unwelcome visitors/intruders

POLICY

PVCC utilises closed circuit television (CCTV) to enhance personal safety, deter and investigate anti- social behaviour, and protect college property.

CCTV or surveillance data will only be used to investigate following an alleged or suspected incident or ongoing incidents.

Areas that are monitored by CCTV will be sign posted so that anyone using those areas are aware of the surveillance.

General signage may be used around the college to discourage potential intruders.

Decisions regarding the position of surveillance equipment will be made by the college executive following consultation with the main staff who may be affected by the videoing of certain areas. Consultation will outline reasons for that specific area to be monitored.

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A camera location plan will be made available to all employees.

Public area video monitoring will be conducted only in areas where the public does not have a reasonable expectation of privacy. Cameras will not, under any circumstances, be located in private locations, such as shower rooms, toilets or change rooms.

The security camera surveillance system will NOT be used for the following purposes:

- monitoring staff or student work performance
- monitoring non-college areas or public places from within the college grounds.

PROCESS

The use of CCTV will be conducted in a manner compliant with all existing federal and state laws and consistent with the values of the Plenty Valley Christian College community so as to minimise the intrusion of privacy of staff, students and visitors in their personal and professional activities. It will be used for legitimate safety and security purposes only, which include but are not limited to the following:

- monitoring building perimeters, entrances and exits, lobbies and corridors, goods receiving areas and special storage areas
- monitoring locations protected by intrusion alarms, exit door controls, security panels
- monitoring areas that contain high value equipment
- reviewing recorded images as part of a criminal or security breach investigation.
- conducting surveillance for areas prone to on-going anti-social or potentially unsafe activity

Administration of CCTV

The principal of Plenty Valley Christian College delegates administration of the college's security system, which includes the security camera network to the ICT department, through the business manager. As such this department is the only college department authorised to implement, oversee and coordinate the use of video recording for safety and security purposes at the college.

Access to CCTV and records

CCTV video will only be accessed when alleged incidents of criminal activities, student misconduct, professional misconduct, misadventure or near-miss have taken place and the principal believes that the CCTV system may have recorded the incident and the principal believes CCTV video would be useful and necessary to investigate the issue.

Access to CCTV video will be restricted to individuals nominated by the principal and whose use of it will be limited to the above stated purpose of surveillance.

Normal maintenance procedures may require routine or diagnostic access to live CCTV cameras.

These times will be limited to the minimum amount of time possible to perform duties and not for observation of people.

Authorisation to release recorded video footage or to permit viewing thereof is only to be granted by the principal, business manager or a nominated representative in his/her absence.

- Authorised viewing of recorded footage is to be conducted in the presence of at least one principal nominee.

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- A principal nominee would typically include but is not limited to, college executive, ICT department, heads of sub schools, facilities manager.
- A log is to be maintained of any authorised requests and access to recorded footage by the ICT department.

Plenty Valley Christian College will provide information, including any surveillance camera recordings to Victoria police or other law enforcement agencies as required for the purpose of investigation of an offence.

Surveillance data will NOT be provided to non-authorised persons, including school staff, parents and contractors without the express approval of the principal or business manager and only for a purpose consistent with this policy.

CCTV information will be regularly erased from the CCTV server unless required for a specific investigation and approved by the principal.

Nothing in these guidelines are designed to contravene the Privacy Act (Cwlth), which stipulates that a person is entitled to access the information concerning him/her, including access to recordings made of him/her. Nonetheless, the Privacy Act (Cwlth) does specify restrictions to the right of access, and any denial of access shall be in accordance with those specifications.

Any request for video footage from an individual or agency for purposes not addressed above will require a search warrant or subpoena.

Covert CCTV

Hidden or covert CCTV will not be installed unless there is a demonstrated need to assist authorities in collecting evidence in a criminal investigation. Such installations will be authorised only by the principal.

ROLES AND RESPONSIBILITIES

The principal is responsible for

- implementing this policy
- ensuring that surveillance is only used for the purposes outlined in this policy
- ensuring that only authorised persons have access to the surveillance material
- the review and maintenance of this policy statement and associated documentation.

The board is responsible for

- ensuring that the principal is fulfilling his/her responsibilities in regard to this policy.

Personnel authorised to manage and view surveillance data

- College executives, heads of sub schools (for student related matters), ICT technicians, facility manager and other authorised personnel engaged in assisting the executive during an approved investigation are required to abide this policy and ensure that any confidential information they may become aware of remains confidential.

DEFINITIONS

Surveillance Devices Act 1999 (Vic) - The Surveillance Devices Act 1999 (Vic) regulates the installation, use and maintenance of surveillance devices such as video cameras (CCTV), listening devices (such as a tape recorder) and tracking devices (such as GPS devices) in Victoria.

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CCTV (closed circuit television) is a generic term used to describe a variety of video surveillance technologies. More specifically, CCTV refers to a system in which one or more video cameras are connected in a closed circuit or loop, with the images produced being sent to a central television monitor or recorded. As used in this document, the term CCTV applies only to video monitoring and recording. The electronic interception and/or recording of audio are generally much more legally restrictive and are outside the scope of this document.

Covert equipment - a camera is covert when it is hidden from normal view or otherwise secreted away, and at least one of the individuals to be recorded has a reasonable expectation of privacy.

Plenty Valley Christian College community - refers to PVCC faculty, staff, students, contract employees, visitors or any other person on college property.

Overt Equipment - a camera is overt when it is not hidden from general view, regardless of whether or not an individual actually sees the monitoring device or knows of its existence. Examples of overt surveillance devices include: CCTV mounted in hallways, parking lots, waiting rooms, etc.

REFERENCES AND SUPPORTING DOCUMENTS

- Surveillance devices act 1999 (Vic)
- Information privacy act 2000 (Vic)
- Closed circuit television in public places guidelines 2012 (Victorian Ombudsman)
- Department of Justice's guide to developing CCTV for public safety in Victoria1 (the Guide)
- Victorian law reform commission's (the VLRC) report surveillance in public places (the VLRC report2)
- Privacy Victoria's surveillance and privacy information sheet
- All relevant college policies.

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DOCUMENT HISTORY AND VERSION CONTROL RECORD

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Category: Staff

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1.1	13/09/2018	Principal	Approved by principal
1.2	28/05/2020	Principal	Update, Added monitoring of areas for afterschool SAC and detention
1.3	14/09/2020	Alison de Haan	Updated to align with new Style Guide

Approved by:



John Metcalfe

14/09/2020
Date