Melbourne Archdiocese
Catholic Schools

Closed Circuit Television Policy

MACS Schools

Purpose

This Policy seeks to ensure best practice regarding the installation and use of closed circuit television (**CCTV**), along with the storage and disclosure of CCTV footage. The Policy and procedures seek to enhance the security of property owned and operated by Melbourne Catholic Archdiocese Schools Ltd (**MACS**) and its Schools (collectively **MACS Premises**) and provide safe environments for all staff, students and visitors.

The use of CCTV in MACS Premises assists with detecting and deterring vandalism, unauthorised entry into buildings, theft, other unwanted activities and monitoring emergency situations, should they occur.

The installation of CCTV systems supports MACS by:

- acting as a deterrent and reducing the likelihood of crime
- deterring misconduct and inappropriate behaviour
- supporting the management and investigation of emergencies and critical incidents
- 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.

Scope

This policy applies to all MACS premises, including MACS's schools and offices, where CCTV is installed.

Policy

Authorisation of CCTV systems and camera locations

1. Authorisation of CCTV installation

1.1. CCTV in MACS Premises must be installed and operated in accordance with this Policy.

1.2. The location where the CCTV is to be installed determines the CCTV Authoriser. Please see below section "Roles and reporting responsibilities" for further details.

1.3. The CCTV Authoriser is responsible for ensuring signage notifies staff, students, visitors, contractors and the general community that CCTV is in operation.

1.4. CCTV installations in MACS Premises must comply with legislative and MACS requirements.

1.5. CCTV Authorisers have the responsibility for the ongoing management of the CCTV. With support and guidance from MACS, CCTV authorisers or an approved nominated staff member, will be responsible for:

1.5.1. controlling the operation of the CCTV system to ensure that it is within the requirements of government legislation and MACS policies

1.5.2. ensuring CCTV cameras are not installed in prohibited locations

1.5.3. ensuring that clearly identifiable warning signs with the message: 'Security Notice – electronic surveillance protects this property' are installed and

1.5.4. supporting the maintenance and upgrade of CCTV cameras when necessary.

2. Camera location

2.1. The CCTV Authoriser is responsible for determining the appropriate location of cameras on MACS Premises in accordance with this policy. Consultation with the MACS Infrastructure Team when implementing CCTV can also occur.

2.2. A plan outlining proposed CCTV camera placement and locations must be completed by the principal prior to installing CCTV systems on school premises. Staff and the school community including parents/guardians/carers and students must be notified prior to installation of CCTV.

Operation and use of CCTV

3. Use of CCTV

3.1. Live CCTV may be used by authorised staff to:

3.1.1. observe potential criminal behaviour

3.1.2. 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

3.1.3. 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 or
- monitoring the CCTV live footage will help to identify the persons involved and/or support the school to reduce the risk of the incident occurring or reoccurring.

3.2. Recorded CCTV footage may be used by authorised staff to:

3.2.1. prevent, verify and investigate incidents involving:

3.2.2. criminal behaviour of anyone on school grounds

3.2.3. staff/student misconduct or

3.2.4. other inappropriate behaviour – including of students, staff, visitors or members of the public. For example, CCTV footage of incidents to help inform decisions about student management.

3.2.5. 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) or

3.2.6. support school leadership with incident review and debriefing.

4. Additional functions

4.1. Authorisation from the Executive Director is required for any additional CCTV functions which may assist in the efficient administrative operation of a MACS school or office. Consultation with MACS Governance, Legal and Compliance and MACS Infrastructure teams is also required. An example of an additional administrative function would include utilising CCTV for number plate recognition for underground or secure entrance car parking.

5. Prohibited use

5.1. CCTV cameras must not be installed or have field of vision in the following prohibited areas:

5.1.1. private locations such as toilets, showers or change rooms

5.1.2. first aid rooms, sick bays

5.1.3. staff rooms/offices

5.1.4. classrooms or

5.1.5. other areas where individual privacy is paramount.

5.2. Hidden or covert CCTV cameras and use of audio recording devices are strictly prohibited.

6. Signage

6.1. The principal or manager of the MACS Premise is responsible for ensuring 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 – 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 and
- checked regularly for damage/theft/vandalism.

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

7. Privacy Notice

7.1. In addition to signage, schools must have a CCTV privacy notice published 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 and
- provide a link to this policy for further information on how the school may use the CCTV system and who may access the footage.

Please refer to Appendix 1 for a Privacy Notice template.

8. Operating requirements

8.1. All employees involved in the operation of the CCTV system are expected to exercise care to ensure appropriate viewing of CCTV footage and to prevent improper disclosure of the recorded material. The CCTV authoriser is responsible for ensuring:

8.1.1. the CCTV system is managed and operated in accordance with the CCTV Policy and for keeping a record of the staff members nominated to access the system

8.1.2. all 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

8.2. When accessing CCTV footage remotely, staff must only use MACS/school mobile phones, iPads or tablets. Personal IT hardware must not be used to access CCTV footage.

Storage of CCTV footage

9. Storage of CCTV footage

9.1. CCTV footage is to be kept for a minimum of 30 days. The recommended storage period is 60 days. If no request has been made to view or access CCTV footage and no specific or significant incidents have occurred, the stored data can be overwritten after a minimum of 30 days.

9.2. When CCTV footage is used to investigate and document specific or significant incidents, including an incident or alleged incident of child abuse, the footage must not be destroyed and must be stored in a secure location indefinitely.

9.3. CCTV footage is to be stored on a designated secure server. Access to the footage must be restricted to network administrators only. Table 1, on the following page, outlines the storage periods for CCTV footage

Table 1: Storage periods for CCTV footage

Retention Category	Notes	Retention period
General footage	Footage that does not fit into any of the below categories and for which no request to view or access has been received	30 – 60 days
Security incident footage	Footage depicting illegal entry, property damage, theft or another security related incident that is not covered by the below categories	7 years after action completed[1]
Child Safety – sexual abuse	Footage that may be used in relation to allegations of incidents of child sexual abuse	Destroy 99 years after action completed[2]
Child Safety - incidents	Footage that may be used in relation to child safety incidents such as bullying or physical violence	Destroy 75 years after action completed[3]
Workplace accident / incident footage	Footage depicting instances where a workplace accident or incident may have occurred and is to be used for a Workcover claim or potential legal proceedings	Destroy 75 years from Date of Birth[4]
Other – retain	Footage that may not fit into the above categories, but which a principal or MACS manager considers should be retained	Retain / destroy at discretion of Principal or MACS manager beyond the minimum 60 day retention period [5]

Access to CCTV footage

10. Access to CCTV footage

10.1. CCTV surveillance images and footage are only to be viewed, by authorised staff, if there is a reasonable belief that an incident has occurred, and that the surveillance data may assist in identifying what has occurred and who may be involved in line with below requirements.

10.2. The CCTV authoriser is required to maintain a register of who has accessed the surveillance images and when. Each register must be stored in a secure location and be made available to authorised MACS office staff on request.

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[1] Australian Society of Archivists Records Retention and Disposal School for Non-Government Schools Class 2.2.6 Security.

[2] PROS 19/08 Retention and Disposal Authority for Records of Organisational Response to Child Sexual Abuse Incidents and Allegations Class 1.2 Reporting.

[3] PROS 22/06 Retention and Disposal Authority for School Records Class 3.1 Long-Term Records of Incidents, Complaints and Investigations.

[4] Australian Society of Archivists Records Retention and Disposal School for Non-Government Schools Class 2.5.2 Compensation.

[5] PROS 07/01 Retention and Disposal Authority for Common Administrative Function Class 14.15.2 Security (Destroy after administrative use is concluded).

11. **Requests**

11.1. Requests to access CCTV footage located at a school premises must be approved by the relevant CCTV authorisers. CCTV authorisers are recommended to seek advice from MACS Legal on 9267 4001 or legal@macs.vic.edu.au when determining any requests. All staff must be briefed on these requirements.

11.2. The request for access to CCTV footage will include the following information:

11.2.1. date of the incident

11.2.2. time of the incident

11.2.3. location of the incident

11.2.4. reason why the viewing has been requested; and

11.2.5. the names of those involved (if applicable).

11.3. During an ongoing emergency or critical incident, the MACS Emergency Management Coordinator or a member of a MACS Critical Incident / Emergency Management Team may request and/or be supplied CCTV footage relating to the emergency or critical incident. In these circumstances, footage should be supplied as soon as possible without the requirement for a detailed written request or legal advice. Any issues or concerns relating to such access should be addressed after the resolution of the incident.

11.4. CCTV surveillance images and footage are only to be viewed, by authorised staff, if there is a reasonable belief that an incident has occurred, and that the surveillance data may assist in identifying what has occurred and who may be involved.

12. Disclosure of footage

12.1. Access to CCTV footage is limited to authorised staff and police with a legitimate reason to view/or otherwise use the captured footage for one of the following security purposes:

12.1.1. to assist in the management and investigation of an emergency or critical incident

12.1.2. to prevent, deter and detect any theft, injury or damage to property

12.1.3. to prevent, deter and detect serious breaches of MACS and/or school expectations or

12.1.4. the collection of information on any incident that breaches MACS and/or school expectations.

12.2. All staff must be made aware of the restrictions set out in the CCTV Policy in relation to access and disclosure of recorded images. Disclosure of the recorded images to third parties should be limited to the following classes of persons/agencies:

12.2.1. law enforcement agencies such as Victoria Police, where the images recorded would assist a specific enquiry or investigation

12.2.2. law enforcement agencies where the images would assist a specific enquiry; and/or

12.2.3. relevant legal representatives.

12.3. A register is to be kept of who has accessed the surveillance images and when.

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

13.1. When using CCTV for the purposes listed in these procedures, the principal may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents, provided:

13.1.1. the principal considers it appropriate and necessary 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

13.1.2. the principal (in consultation with the MACS Emergency Management Coordinator) considers it appropriate and necessary to use footage to assist in the resolution or investigation of an emergency or critical incident (e.g., to assist in identifying victims and/or potential offenders)

13.1.3. it would not cause a health, wellbeing or safety risk to any other person and

13.1.4. it would not be an unreasonable intrusion into another person's privacy.

13.2. Schools are to contact MACS Legal (contact details above) 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.

Reporting criminal offences

14. Reporting criminal activities

14.1. Criminal activities are to be reported to the police in line with relevant legislative requirements and MACS policies. For further advice, please contact MACS Legal on 9267 4001 or legal@macs.vic.edu.au.

Managing concerns and complaints

15. Managing concerns and complaints

15.1. Complaints about a school's CCTV system should be managed using the processes outlined in the school's Complaint Handling Policy.

15.2. If a person is not satisfied that their complaint has been resolved by the school, or if their complaint is about the principal of the school, their complaint may be escalated in accordance with the school's Complaint Handling Policy or they may refer their complaint to MACS via: https://www.macs.vic.edu.au/Contact-Us/Complaints.aspx

Roles and responsibilities

Role	Responsibility	Reporting requirement
Approval of installation of camera in a MACS School	Principal of relevant School	N/A
Approval of installation of camera in MACS Regional Offices	MACS general manager for relevant region	N/A
Approval of installation of camera – James Gould House, Catholic Leadership Centre and any MACS Premises not specified above	MACS General Manager Infrastructure	N/A
Approval of additional functions of CCTV	MACS Executive Director	N/A
Maintain a register of accessed footage	CCTV Authoriser	MACS executive upon request

Definitions

Closed Circuit Television (CCTV)
A surveillance system in which cameras are connected through a closed circuit. The footage taken by the cameras is sent to a television monitor or recorder. CCTV systems consist of cameras, monitors, recorders, interconnecting hardware and support infrastructure.

CCTV Authoriser

Person responsible for authorising the installation and location of CCTV. Within MACS' schools this is the principal.

MACS manager or manager
A member of the senior leadership team (SLT) of MACS office or a principal or other senior leader in a MACS school.

MACS premises
Any premises occupied by MACS or its subsidiaries (as the context requires), including MACS's schools and offices.

Principal
Individual appointed by MACS as principal in a MACS school.

Server
A computer or computer program, which manages access to a centralised resource or service in a network.

Policy information table

Responsible director	Director, Governance, Legal and Compliance
Policy owner	General Manager, MACS Legal – Corporate
Approving authority	Executive Director
Approval date	20 June 2024
Risk Rating	High
Review by	June 2028
Publication	CEVN, MACS office, school website, MACS website

POLICY DATABASE INFORMATION	
Assigned framework	Care, Safety and Welfare of Students
Related documents	Emergency Management and Critical Incident Management Policy Privacy Policy
Superseded documents	
New policy	New

Appendix 1: CCTV Privacy Notice Template

Penola Catholic College - CCTV Privacy Notice

Penola Catholic College has a closed-circuit television (CCTV) system on the premises. This Privacy Notice outlines how the CCTV system will be used, including the use and disclosure of any footage produced by the CCTV system, to be consistent with Victorian law.

Need for CCTV

Penola Catholic College has an obligation to ensure the environment is safe and secure, and fulfil our duty of care to all persons, students, staff and visitors. The CCTV system assists Penola Catholic College to fulfil these obligations and to prevent and manage other inappropriate behaviour on the premises. CCTV also provides enhanced capability to protect the premises against vandalism and theft.

Use of CCTV

Penola Catholic College may use CCTV cameras to:

- prevent, support and verify incidents involving:
  - criminal behaviour
  - staff misconduct
  - other inappropriate behaviour – including of students, staff, visitors or members of the public.
- verify and investigate other incidents involving students, staff and visitors (for example incidents in which a person has sustained injury, loss or damage on school premises)
- assist in the resolution of emergencies and critical incidents

Prohibited use of CCTV

CCTV cameras are not used in the following prohibited areas:

- private locations such as toilets, showers or change rooms
- first aid rooms, sick bays or staff rooms
- classrooms with the exception of high risk plant and equipment areas and high risk of loss of property.
- other areas where individual privacy is paramount.

CCTV cameras may be used to review incidents involving staff and/or students. Hidden/covert CCTV cameras and audio recording devices are not used.

Location of CCTV cameras in our school

In our school, CCTV cameras are located in:

External areas such as key entry and exit points across the college buildings, throughfares and grounds.

Internal areas of the College that involve high risk plant and equipment and areas of risk of property loss.

Access to CCTV footage

CCTV footage is only accessed for the purposes set out in this Privacy Notice and the MACS CCTV Policy and only by the following people:

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

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

Request to view CCTV footage

Requests to access CCTV footage located on MACS premises are to be submitted to Penola Catholic Property Manager

A request for access to CCTV footage is to include the following information:

- date of the incident
- time of the incident
- location of the incident
- reason why the viewing has been requested and
- the names of those involved (if applicable).

The request will then be assessed by Property Manager If appropriate, the Property Manager may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents. This will be provided:

- the Property Manager considers it appropriate and necessary to support [persons/parents/guardians/careers] 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.

Please note, copies of the CCTV footage will not be provided unless required by law.

Storage of CCTV footage

CCTV footage is stored locally on the Penola Catholic College server. CCTV footage is kept for a minimum of 30 days. If Penola Catholic College 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 may be 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 the retention requirements and privacy legislation.

Further questions

For more information of how MACS premises may use the CCTV system and who may access the footage, please contact

Property Manager

Penola Catholic College

9301 2777

principal@penola.vic.edu.au