

CAMERA SURVEILLANCE (CCTV) POLICY

POLICY STATEMENT

At Ormiston College, surveillance cameras (CCTV) are used for the legitimate purposes of deterring property crime and other criminal offences, as well as ensuring the safe management of the College grounds, assets, people and for the protection of students.

CCTV will not be used for covert surveillance or staff performance monitoring unless legally authorised.

Personal information may be collected by CCTV as a result. This Policy outlines how CCTV is managed, to ensure this information is protected in accordance with legislative requirements.

PURPOSE

The purpose of this Policy is to outline the lawful and responsible use of Camera Surveillance systems used by Ormiston College.

SCOPE

This Policy is to be adhered to by all stakeholders which includes all staff, students, children, parents, directors, volunteers, visitors and contractors at the College.

LEGISLATION and REFERENCES

- *Privacy Act (Cwlth) 1988*
- Australian Privacy Principles (APPs)
- *QLD Information Privacy Act 2009*
- *Invasion of Privacy Act 1971 (Qld)*
- *QLD Workplace Health and Safety Act 2011*
- *QLD Civil Liability and Other Legislation Amendment Act 2019 (CLOLA)*
- *QLD Limitation of Actions (Child Sexual Abuse) and Other Legislation Amendment Act 2016*
- *QLD Human Rights Act 2019*
- *Education (General Provisions) Act 2006 (Qld)*
- *Public Records Act 2002 (Qld)*
- *Criminal Code Act 1899 (Qld)*
- *Criminal Code (Qld) s227A*
- *Surveillance Devices Act 2004 (Cth)*
- Australian College of Archivists (ASA) - Records Retention & Disposal Schedule for Non-Government Schools - 2nd Edition

Ormiston College Related Documents

- Acceptable Use of ICT Services Policy
- Privacy Policy
- Reporting Concerns of Harm and Abuse Policy
- Information Security Management System (ISMS) Policy

DEFINITIONS

- **CCTV:** Closed-Circuit Television used for surveillance and recording of visual images.
- **Personal Information:** Information or opinion about an identified individual or an individual who is reasonably identifiable.
- **Surveillance:** Monitoring of behaviour, activities or information for the purpose of information gathering or influencing.
- **Footage:** Recorded video data captured by CCTV systems.
- **Authorised Personnel:** Individuals granted access to CCTV systems and footage as per this Policy.

RESPONSIBILITIES

Headmaster

- Provides delegation of who may view the footage, and its distribution to 3rd parties (other than the Police) outside the College.
- Handles personal requests from the College community and outside parties regarding CCTV use and footage.

Business Manager

- Accesses the CCTV system for the purpose of protecting the College grounds and assets.
- Provides advice on the expansion of the CCTV systems.

Manager ICT Services and Network Administrator

- Maintains the CCTV systems including the infrastructure and storage to enable the CCTV system to operate effectively.
- Engages CCTV vendors and professionals in relation to maintenance.
- Accesses the CCTV systems as delegated by the Headmaster and on behalf of the College Executive to find footage related to an incident. This access is documented.
- Performs other duties in relation to CCTV as directed by the Headmaster or Business Manager.

Property Manager and Caretaker

- Accesses the CCTV system for the purpose of protecting the College grounds, assets and Workplace Health and Safety investigations.

NOTIFICATION OF SURVEILLANCE

The College informs the following people that CCTV is in use throughout the College:

- Staff through the Onboarding Induction Program and this Policy.
- Parents and the general public via the wayfinding signage located around the campus.
- Visitors to the College receive notification as part of the College sign-in procedure.

LOCATION OF CCTV CAMERAS

CCTV cameras are positioned in public areas, streets, Reception areas and thoroughfares of the College, specifically for the purposes outlined in this Policy. Cameras are positioned such that private areas (eg. the inside of toilets or changerooms) are not viewable or recorded. Covert surveillance is strictly prohibited unless authorised under applicable law.

Due to the nature of early childhood, the College feels it is best to specifically feature CCTV cameras inside the classrooms of the Early Learning Centre. These cameras can only view the classroom and not the adjacent toileting areas.

PERSONAL INFORMATION

The CCTV system stores personal information including:

- the image of a person;
- the images of 3rd party property brought onto the campus eg. a vehicle with number plates;
- any legible writing that is in the footage that may contain names, addresses, financial or health details.

The CCTV system does not store audio recordings.

ARTIFICIAL INTELLIGENCE

Although the camera system installed at the College is capable of using artificial intelligence in identifying individuals via facial recognition, number plate recognition and other object detection, these functions have been disabled upon installation. The College does not use artificial intelligence to track the movements of people throughout the Campus.

PRIVACY IMPACT ASSESSMENT

Privacy Impact Assessments are carried out prior to the installation or significant expansion of CCTV systems to evaluate privacy risks and mitigation strategies.

STORAGE AND RETENTION OF FOOTAGE

The CCTV systems store footage on a secured server located on campus. Access to the footage on the server is limited to authorised personnel only.

The CCTV server has a limited recording capacity such that, older footage is overwritten by the latest footage. CCTV cameras record footage when movement is detected in front of them. The amount of movement, eg. windy days, student movement, College public events, will vary and thus the amount of time footage recorded may vary.

In general, the minimum time footage stored is 30 days, the maximum time footage kept is no more than 90 days.

Any copies of footage required for investigation are stored on campus on an access-controlled area of the College file server. This information/data is generally kept for the required length of the investigation or as required under the *Criminal Code Act 1899*¹, or as directed by an Australian Court of Law or Australian law enforcement.

¹ *Criminal Code Act 1899*

Disposal of the footage is handled in conjunction with the College Information Security Management Policy using procedures compliant with ISO27001 standards.

Any long-term retention of footage is governed by the Australian Society of Archivists - Records Retention & Disposal Schedule for Non-Government Schools².

ACCESSING FOOTAGE

The following authorised personnel may access footage:

- **Executive Staff** – may access footage in relation to an incident that is within their area of responsibility eg. student behavioural issues.
- **General Staff** – should the incident be in relation to duty of care or workplace safety then first contact should be with the Head of School or the Property Manager. These staff will then follow procedures to access the camera footage. If it is for personal reasons eg. their car has been damaged, then the staff member should write to the Headmaster for permission to access the footage with the Manager - ICT Services (or Network Administrator).
- **Property Manager and Caretaker** – may directly access footage in relation to College assets or to investigate Workplace Safety incidents.
- **Manager - ICT Services and Network Administrator** – beyond handling requests by Executive staff or on behalf of the Headmaster, may access footage directly for the purposes of maintaining or expanding the CCTV systems.

DISCLOSURE OF FOOTAGE

Footage may be disclosed:

- to law enforcement under legal request
- in response to subpoenas or court orders.

REQUESTS TO ACCESS FOOTAGE BY THE GENERAL PUBLIC

All requests by third parties or the general public should be made in writing and addressed to the Headmaster.

The Headmaster may seek legal advice to determine if disclosure of CCTV footage to the individual requesting it is warranted and to ensure correct procedures are performed in disclosing the footage.

DATA BREACH RESPONSE

In the event of unauthorised access or disclosure of CCTV footage, the College will follow its Data Breach Response Plan and comply with the Notifiable Data Breaches Scheme under the *Privacy Act 1988 (Cth)*³.

² Australian Society of Archivists - Records Retention & Disposal Schedule for Non-Government Schools

³ *Privacy Act 1988 (Cth)*

Version and Review Control Register

Version	Policy Document Owner	Policy Document Approver	Approval Date	Changes History/ Superseded Documents	Next Review Date
v230124	Ormiston College Governing Body	Headmaster	12/03/24		January 2026
v130326	Ormiston College Governing Body	Headmaster	23/04/2026	<ul style="list-style-type: none"> • Specific indication that we do not use CCTV for covert surveillance or staff performance • Clear Definitions • Indication that when we expand the system we conduct a privacy impact assessment • More detailed storage and retention section, including specific mention of disposal and retention practices • Clearer disclosure of footage section • Data Breach Response 	April 2028