



## Policy

This policy outlines the requirements relating to the design, installation and responsible management and use of closed-circuit television (CCTV) systems in Victorian government schools. Schools must implement and operate CCTV systems in accordance with this policy.

## Summary

- This policy outlines requirements for design, installation, management, and responsible use of CCTV in Victorian government schools.
- CCTV is one security measure that schools can use to support a safe and secure school environment.
- CCTV can deter inappropriate behaviour such as vandalism and theft, and also provide evidence to verify incidents.
- Approval to install CCTV in Victorian government schools must be sought from the Security Unit.
- Resources are provided to support schools to install, manage and use CCTV effectively (following approval), including:
  - installation and maintenance checklists
  - recommended products, installers, and technical specifications
  - advice on signage, privacy, and communication.

## Details

The installation and use of CCTV systems within schools can support and enhance a school's ability to provide a safe and secure school environment for students, staff and visitors. Schools must ensure that privacy is considered in the installation and use of CCTV systems.

Installing CCTV systems on school grounds can support schools and the Department by:

- acting as deterrent and reducing the likelihood of vandalism and theft
- deterring misconduct and inappropriate behaviour
- 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.

## Installation of CCTV systems

### Approval process for installation of CCTV systems

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The installation of CCTV at any school must be approved by the Manager, Security Unit, DET Security and Emergency Management Division.

The Security Unit maintains a range of supporting documents to help guide schools through the planning, design and implementation of a CCTV system, including:

- the approval process
- a list of recommended installers.

To initiate the approval and planning process for the implementation of a CCTV system, schools must submit the [CCTV system expression of interest form \(DOCX\)](#) (staff login required) to the Manager, Security Unit by email: [school.security@education.vic.gov.au](mailto:school.security@education.vic.gov.au)

On receipt of the form, the Security Unit will assess the request and work with the school to create an initial design to ensure the school's needs are met.

This design can then be used to engage contractors for quoting purposes based on the Department's list of recommended installers and as part of an approved procurement process.

Prior to a confirmation of approval notification being provided to the school by the Manager, Security Unit, the school must provide:

- a final marked-up site plan (this can be created by the installer) indicating:
  - the location of CCTV camera and related equipment
  - supporting signage
- a copy of the wording of the supporting signage being installed
- a signed copy of the [CCTV policy acknowledgement \(DOCX\)](#) (staff login required).

The Security Unit staff are available to support this process. Schools may also refer to the [CCTV implementation checklist \(DOCX\)](#) (staff login required).

## Consultation

Before deciding to install a CCTV system, the principal must consult with and take into account the views of the school council. The principal may also wish to extend consultation to other members of the school community including staff, students and parents.

## Decision to install

The final decision to install a CCTV system rests with the principal (subject to the approval of the Manager, Security Unit).

If, following consultation, the principal decides to install a CCTV system, the school must inform the school community of the intention to install a CCTV through appropriate channels such as a:

- newsletter article
- statement on the school website
- posted material within the school grounds.

For sample content to adapt for the school community refer to: [CCTV installation information for school community – sample content \(DOCX\)](#) (staff login required).

### Design and specification

The [CCTV installation guiding principles \(DOCX\)](#) (staff login required) provide minimum standards for Victorian government school CCTV systems and, when provided to members of the Department's approved list of suppliers, will help to ensure that quotes are accurate and can be easily compared in order to determine the most appropriate quote for the school.

The Security Unit can advise schools on the scope, design and system requirements of the proposed CCTV system and will approach the task from a risk management perspective ensuring that the selected CCTV system is both effective and value-for-money.

### Location of CCTV cameras

The principal, in collaboration with the Security Unit, is responsible for determining the appropriate location of cameras in accordance with this policy.

### Prohibited locations of CCTV cameras

Schools must not install CCTV cameras in the following areas:

- toilets
- change rooms
- dressing rooms
- showers
- other areas where individual privacy is paramount.

### Covert surveillance

Schools are not permitted to undertake their own covert (or hidden) surveillance using CCTV systems.

Enquiries regarding installation of CCTV cameras for the purpose of covert surveillance must be made to Manager, Security Unit, who will instigate a broader collaborative approach involving Legal Division and the Privacy Branch to determine

if a covert CCTV system installation is the most appropriate course of action and complies with Victoria laws.

The Department will only consider allowing CCTV installation for the purpose of covert surveillance in exceptional circumstances and when the installation and surveillance complies with Victorian laws.

## Signage

All schools have a responsibility to ensure 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, including people from non-English speaking backgrounds – 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
- checked regularly for damage/theft/vandalism.

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

## CCTV privacy notice

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

A [template privacy notice \(DOCX\)](#) (staff login required) has been developed to support schools with this process.

## Management and operation of CCTV

The principal is responsible for ensuring the CCTV system is managed and operated in accordance with this policy and for keeping a record of the staff members nominated to access the system.

All school 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
- made aware that access to live and recorded footage may be subject to review by the Department and they may be required to justify any access to footage.

#### Access to CCTV footage

CCTV footage must only be accessed for the purposes set out in this policy (refer to 'Use of CCTV footage' below) and only by the following people:

- the principal and staff nominated by the principal
- authorised staff of the Department's Security and Emergency Management Division (including via remote access)
- any other people permitted or required by law.

Schools must record each occasion CCTV footage is accessed in the [CCTV recorded and viewed footage register \(DOCX\)](#) (staff login required).

#### Use of CCTV footage

CCTV footage may only be used for the following purposes.

##### Live CCTV footage

Live CCTV footage may be used by authorised school or Department staff to:

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

Note: Schools must contact the Security Unit for advice before monitoring CCTV footage in this manner
- provide the Department with visual coverage during emergencies.

##### Recorded CCTV footage

Recorded CCTV footage may be used by authorised school or Department staff to:

- prevent, verify and investigate incidents involving:
  - criminal behaviour of anyone on school grounds
  - staff misconduct
  - other inappropriate behaviour – including of students, staff, visitors or members of the public. For example, this means the school may use CCTV footage of incidents to help inform decisions about student management
- 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)
- support school leadership with incident review and debriefing.

The Employee Conduct Branch must be consulted prior to the use of CCTV footage for staff misconduct or discipline related matters.

### Prohibited uses

In addition to the prohibited locations of CCTV cameras above, CCTV footage must not be used by schools:

- to monitor non-school facilities or public places
- to monitor staff performance
- for the purpose of covert surveillance except in accordance with this policy – refer to the heading 'Covert surveillance' above.

### Disclosure of CCTV footage to external parties

Live or recorded CCTV footage may only be disclosed externally (external to the Department) as described in this policy or otherwise when permitted or required by law.

Examples of when CCTV footage may be disclosed externally include:

- live or recorded footage disclosed to law enforcement agencies where required or permitted by law
- when required under a court order.

Schools may contact the Department's Privacy Unit and/or Legal Division for advice when they receive a request from an external party for access to live CCTV footage or for copies of recorded CCTV footage to help determine if the footage can be shared with the party or if they need to be referred to the Department's Freedom of Information Unit.

### Privacy Unit

- Phone [03 8688 7967](tel:0386887967)
- Email [privacy@education.vic.gov.au](mailto:privacy@education.vic.gov.au)

## Legal Division

- Phone [03 963 3146](tel:039633146)
- Email [legal.services@education.vic.gov.au](mailto:legal.services@education.vic.gov.au)

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

When using CCTV for the purposes listed in this policy under the heading 'Use of CCTV', the principal may show specific footage of an incident to those directly involved, including relevant staff, students and/or their parents, provided:

- the principal considers it appropriate and necessary in order 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
- 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.

Schools may contact the Privacy Team or Legal Division 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. Any parent, student or staff request for a copy of CCTV footage must be made to the Department's Freedom of Information Unit.

## Freedom of Information Unit

- Phone [03 7022 0078](tel:0370220078)
- Email [foi@education.vic.gov.au](mailto:foi@education.vic.gov.au)

## Recorded material – storage and retention

The principal or their nominated staff member is responsible for ensuring CCTV recorded images are stored securely and retained for the required period of time.

CCTV footage must be securely retained for a minimum of 31 days.

If the CCTV footage has not been accessed or used in the ways set out above and there has been no request to view or otherwise access the footage, the footage may be deleted after 31 days. The number of days for system retention of footage is determined during the installation of a CCTV system.

Where the CCTV footage has been accessed or there has been a request to access, schools must manage these records in accordance with the retention requirements set out in the Department's policy: [Records Management – School Records](#).

## Ownership of CCTV systems and footage



The Department owns school CCTV systems and footage.

### Maintenance of CCTV systems

Principals are encouraged to review arrangements for school management of CCTV systems, including confirming that the equipment is working effectively, on a termly basis. Where system issues are discovered, schools are encouraged to engage an approved contractor to rectify these issues. For a detailed checklist that can be used for this review refer to: [CCTV maintenance checklist \(DOCX\)](#) (staff login required).

Schools are also encouraged to have their recording equipment checked on an annual basis by an approved contractor (from the Department's list of approved suppliers) to ensure the system is maintained in good working order.

### Complaints

Parent complaints relating to CCTV systems should be managed in accordance with the Department's [Parent Complaints Policy](#) and the school's own parent complaint policy and procedures. The Security Unit and the Privacy Unit can be contacted for advice and support in managing parent complaints in these circumstances.

Complaints from other members of the community can be managed by the school, with support and advice from the Security Unit or can be referred directly to the Security Unit for response.

If referred on, the Manager, Security Unit, must provide a written report to the Director, Security and Emergency Management Division, highlighting key findings and appropriate solutions within an agreed timeframe not to exceed 4 weeks. The Director, Security and Emergency Management Division, will take action as appropriate within departmental guidelines, and then advise the complainant

## Definitions

### CCTV footage

Closed-circuit television (CCTV) refers to broadcasts transmitted to a limited number of closed monitor/s for the purpose of video surveillance. The video is often recorded for set periods of time and the footage used for evidence.

### Incident

Incident is defined in [Reporting and Managing School Incidents \(including emergencies\)](#).

### Remote access

The ability to access the CCTV system remotely (while not on location).

### Situational awareness

The state of knowing what has occurred and what is currently happening in an



incident or emergency – based on the best available knowledge, information, and data.

## Related policies

- [Crime Prevention in Schools](#)
- [Police – Department Protocol on Reporting Criminal Activity](#)
- [Privacy and Information Sharing](#)
- [Reporting and Managing School Incidents \(including emergencies\)](#)
- [Schools' Privacy Policy](#)

## Relevant legislation

- [Ministerial Order 1280 Constitution of Government School Councils 2020 \(DOCX\)](#)
- [Privacy and Data Protection Act 2014 \(Vic\)](#)