



Procedure

CCTV use in schools

Audience

All state schools

Implementation date: 01/03/2019

Version: 1.0

Purpose

This procedure provides a process for principals to assess the need for Closed circuit television (CCTV), apply for approval for CCTV use and to manage the collection and storage of personal information collected through CCTV.

Overview

Schools face a variety of security related threats. Closed circuit television (CCTV) can be an effective tool to help a school to meet its obligation to provide a safe and secure environment for staff and students and meet its duty of care obligations.

This obligation does not prevent the use of CCTV in schools for a legitimate and lawful purpose, however they do necessitate the department to implement strict practices associated with the operation of CCTV, and the management of the information collected through its use.

The Emergency and School Security Unit (E&SS) assists principals in ensuring plans for CCTV are in line with the department's procedure, and also that proposed procurement and placement of CCTV equipment is suitable, and will effectively fulfill its intended purpose.

E&SS maintains an ongoing partnership with Protective Services, part of the Qld Police Service, for several aspects of school security. One aspect of this partnership is the provision of procurement, installation and technical advice relating to CCTV equipment. Protective Services will carry out procurement processes and practices in accordance with the department's requirements, specifications set out under relevant industry better practice standards and Queensland Government procurement principles set out under the [Queensland Government Procurement Policy](#).

Responsibilities

Principals

- decide whether CCTV is an appropriate risk management strategy in their school
- consult the school community including neighbours, the Queensland Police Service, P&C and the local community about the proposed use of CCTV and document any concerns raised
- consult the relevant School Security Advisor from E&SS to assist in determining appropriate locations and positioning of CCTV cameras, as well as what steps should be taken for CCTV to be compliant with all relevant [legislative requirements](#)
- manage the installation, positioning and signage of CCTV equipment in consultation with the School Security Advisor
- manage the CCTV equipment and the footage collected by CCTV, ensuring the continual compliance with all relevant legislative requirements in respect of the use of CCTV at the school

School Security Advisor

- provide advice to the school principal about the appropriateness of CCTV as a risk management strategy and the location and positioning of CCTV
- liaise with Protective Services about procurement and installation
- review proposed CCTV scope of works and equipment lists submitted by schools to ensure the scope and equipment comply with this procedure and Australian Standards for CCTV equipment
- provide ongoing assistance and advice to the school principal as required.

Emergency and School Security Unit (E&SS)

- assess applications made by the school principals for CCTV
- arrange procurement of CCTV in consultation with the school security advisor and Protective Services
- create and maintain an accurate register of CCTV equipment installed in all schools
- liaise with school security advisors in relation to applications, installation and ongoing management of CCTV.

Infrastructure Services Branch (ISB) Procurement Support Unit

- manage procurement of CCTV equipment in accordance with [Queensland Government procurement principles](#).

Document Management Services (DMS)

- provide advice to school principals regarding the retention and disposal of footage collected by CCTV cameras.

Legal and Administrative Law Branch (LALB)

- process right to information, information privacy applications and subpoenas received by a school in relation to personal information collected through the use of CCTV equipment

Process

Principal

1. Identify a need for CCTV

- The principal must consider whether it is necessary to adopt CCTV as a strategy to address the purpose for which it has been identified, and whether there is an alternative strategy to using CCTV that would sufficiently achieve the intended purpose. Consideration should also be given to whether CCTV would be more effective as part of a suite of strategies, such as upgraded lighting, securing of perimeter gates, and community engagement in the School Watch Program.
- In deciding on CCTV, the principal must consider and document :
 - past security incidents, issues and problems (frequency, nature and severity of incidents)
 - how will CCTV help?
 - are there any available alternatives to CCTV for example extra security patrols, new fencing, other security measures? Have any alternatives already been trialled and what where the results?
 - the information documented as part of this step must be included in the application stage (step below) of this process

2. Identify a purpose – when can CCTV be used?

- The use of CCTV in schools involves the potential collection of ‘personal information’ – any personal information collected through the use of CCTV can only be collected and used when:
 - There is a ‘lawful purpose’ which directly relates to the function of the school (i.e. the provision of safe and secure learning environments that support the provision of high quality education for teaching and learning); and
 - The personal information is necessary to fulfil that purpose or is directly related to fulfilling that purpose.
- CCTV must not be used for monitoring:
 - toilets
 - change rooms
 - classrooms
 - staff rooms and offices.
- The following specific guidelines must be observed where CCTV is used in a ‘sick room’:
 - All parents must be notified and any concerns addressed before CCTV in sick rooms can be considered.
 - CCTV must be used for remote monitoring only and must not have a recording capability.
 - The CCTV must be part of a stand-alone system, separate to the wider CCTV network and school IT network.
 - Remote monitoring must be undertaken by persons from an established list of authorised persons.
 - Monitoring equipment must be appropriately secured from physical access.
 - If privacy is required (for example, if a student is sent to a sick room to change into a clean uniform as their uniform is damaged after an incident) CCTV cameras must be switched off.

- CCTV must not be used to covertly monitor staff under any circumstances.
- 'Dummy' CCTV cameras must not be used in schools under any circumstances.
- Refer to [Fact Sheet 2 – When and where CCTV can be used](#) for further information to assist in determining what purposes CCTV can be used for.

3. Consultation

- Prior to an application being made under step 4, the principal must consult with all relevant stakeholders including neighbours, community groups, Queensland Police, the Parents and Citizens' Association and any other person or group who might have an interest in the use of CCTV cameras at the school.
- Any concerns or objections must be documented in writing and details must be included in the application process (step 4 below).
- See [Fact Sheet 3 – Informing the school community about the use of CCTV](#) for further information about communicating with the public and other relevant stakeholders about CCTV use.

4. Application and procurement

- The [Notice of intention to use CCTV in a school form](#) must be completed and forwarded to [E&SS](#) for processing prior to progressing procurement of any CCTV equipment.
- E&SS will liaise with the principal and the school security advisor to work through any identified issues or to obtain any further information required.
- E&SS will notify the principal in writing of the outcome of their notice and subsequent recommendations for use of CCTV. Reasons must be provided if a recommendation is made not to use CCTV.
- Procurement of CCTV equipment and installation services will be managed by the principal in conjunction with relevant region staff and E&SS to ensure that procurement of equipment is in accordance with [Queensland Government procurement principles](#).
- The principal must arrange for a proposed scope of works and list of equipment to be forwarded to their school security advisor before installation commences, to ensure the equipment complies with [department standards and specifications](#) (DoE employees only) as well as relevant [Australian Standards for CCTV equipment](#) (DoE employees only). Under no circumstances should a school procure its own CCTV equipment without consultation from their school security advisor.

5. Installation, positioning and signage

- Installation of approved CCTV equipment must be managed by the principal in consultation with the school security advisor. It is the principal's responsibility to ensure that register of CCTV equipment including placement of cameras and recording equipment is forwarded to E&SS.
- Locations and positioning of CCTV cameras will be determined by the principal in consultation with the school security advisor on a case by case basis. CCTV cameras should be:
 - Located and positioned so that they only view areas relevant to the intended purpose;
 - Located and positioned in a way that will not intrude to an unreasonable extent on the privacy of individuals, and;
 - Located and positioned so that the images captured enable identification of individuals for the intended purpose.

- Refer to [Fact sheet 2: When and where CCTV can be used](#) for further guidance regarding location and positioning of CCTV.
- Principals must take reasonable steps to make individuals aware of the existence of CCTV, the purpose for collecting personal information and the details of any entities to which the school might disclose information collected by the CCTV.
- As a minimum, [approved signage](#) (DoE employees only) should be placed at every entry point to the school grounds as well as the entrance to every CCTV camera's area of operation.
- Refer to [Fact Sheet 3 – Informing the school community about the use of CCTV](#) for further information about signage requirements.

6. Management, use and disclosure of CCTV footage

- CCTV equipment and any data collected through its use must be managed strictly in accordance with the Privacy Laws. Refer to [Fact sheet 4 – Management, use and disclosure of CCTV footage](#) for information about:
 - safeguards which can be employed to protect personal information held at schools
 - protocols for use, storage and deletion of CCTV footage
 - guidelines for when footage can be disclosed and special requirements for requests by law enforcement agencies.
- The principal must keep a copy of the footage and include with it a copy of the complete and signed LEA Disclosure request form.
- Principals must not take any action in response to a subpoena or court order. The principal must contact the [Legal and Administrative Law Branch \(LALB\)](#) (DoE employees only) as soon as a subpoena or court order is received, and LALB will action and respond on behalf of the Director General. All right to information applications, information privacy applications and subpoenas received by a school in relation to personal information collected by CCTV cameras should be forwarded to AdviceRequest.LEGAL@qed.qld.gov.au.
- The principal is responsible for completing and keeping an accurate [Disclosure register](#) which records the details of each time there is a disclosure of footage from a CCTV camera.
- If CCTV footage contains evidence relied upon in a decision to suspend or exclude a student, it must be retained for the same period of time the suspension/exclusion documents are required to be retained. This is because the footage relied upon will form part of the decision to suspend or exclude the student. Similarly, if CCTV camera footage is used to capture a workplace accident or personal injury giving rise to a personal injury or WorkCover claim, the footage must be retained for as long as the claim documents must be retained, as per the [Records retention and disposal schedules](#) (DoE employees only).

7. Ongoing compliance

- Immediately after installation, and at least annually thereafter, principals must carry out a compliance audit using the [Compliance checklist](#) of their CCTV equipment, data storage and management arrangements.
- Any issues arising from the use of CCTV are to be raised with the school security advisor as soon as possible.

Definitions

CCTV	Includes any equipment used to observe and record images of individuals, such as an installed surveillance system of temporary or fixed cameras, body-worn video and drone technology, for the purpose of deterring personal and property crime and assisting in the investigation of criminal offences.
Personal information	Any information or opinion, whether true or not, and whether recorded in material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, section 12 of the <i>Information Privacy Act 2009</i> (Qld).

Legislation

- [Information Privacy Act 2009 \(Qld\)](#)
- [Education \(General Provisions\) Act 2006 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Public Records Act 2002 \(Qld\)](#)
- [Right to Information Act 2009 \(Qld\)](#)

Delegations/Authorisations

- Principals are delegated as a 'responsible officer' by the Director-General authorised to dispose of public records under the [Public Records Act 2002 \(Qld\)](#)

Related policies

- Nil

Related procedures

- [Disclosing personal information to law enforcement agencies](#)
- [Information asset and record keeping](#)
- [Information privacy and right to information](#)
- [Access to records held in schools](#)

Guidelines

- [Office of the Information Commissioner – Camera surveillance and privacy](#)

Supporting information/websites

- [Fact sheet 1 – Legislative considerations](#)
- [Fact sheet 2 – When and where can CCTV be used?](#)
- [Fact sheet 3 – Informing the school community about the use of CCTV](#)
- [Fact sheet 4 – Management, use and disclosure of CCTV footage](#)
- [Fact sheet 5 – FAQs and case studies](#)
- [Notice of intention to use CCTV](#)
- [Approved signage](#) (DoE employees only)
- [CCTV footage disclosure register \(sample\)](#)
- [Compliance checklist – CCTV use in schools](#)
- [Undertaking a privacy impact assessment](#)
- [Office of the Information Commissioner](#)
- [School security handbook](#) (DoE employees only)
- [General retention and disposal schedule – Queensland State Archives](#)
- [DoE Records retention and disposal schedules](#) (DoE employees only)
- [DoE Records retention and disposal handbook](#) (DoE employees only)

Contact

For further information, please contact:

Manager, Emergency and School Security Unit

Phone: 3034 6025

Email: isb.emergencysecurity@qed.qld.gov.au

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Superseded versions

Previous seven years shown. Minor version updates not included.

Nil

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