

CCTV/Video Surveillance Policy

Introduction

As part of the school's strategy to ensure the safety and security of children, staff, and visitors and to protect the school property, Child Side Playgroup and School (CSS) uses a CCTV video surveillance system. The system is designed and installed to monitor external areas of the school site only.

The use of CCTV/video surveillance strengthens, supports, and supplements, and does not replace CSS protective behaviours processes and overall duty of care responsibilities.

Scope and Application

This policy applies to all school staff (paid/unpaid), parents/guardians, children, volunteers, practicum teachers, work placement students, and visitors (including therapists, contractors, delivery staff, community groups) and any other individuals who may use or visit the school site of CSS.

The use of the word child/children in this policy refers to students in the context of the school environment.

The use of the word Educator/Educators in this policy refers to registered teachers in the context of the school environment.

Related Legislation/Guidelines

- National Child Safe Organisation Principles
- Privacy Act 1988(Cth)
- Privacy and Other Legislation Amendment Act 2024 (Cth)
- Privacy and Responsible Information Sharing Act 2024 (WA)
- Privacy Compliance Manual (Independent Schools Australia)
- School Education Act 1999
- School Education Regulations 2000
- Security and Related Activities (Control) Act 1996 (WA)
- State Records Act 2000 (including Retention and disposal Authorities)
- Surveillance Devices Act 1998 (WA)
- Teacher Registration (General) Regulations 2012
- Teacher Registration Act 2012

Related Policies

- CSS Child Protection Policy
- CSS Code of Conduct – School Staff
- CSS Code of Conduct – ECC & MCC (K- Y6)
- CSS Code of Conduct – Parents/Guardians

- CSS Code of Conduct – YAC (Y7-Y10)
- CSS Critical and Emergency Incidents and Crisis Management Policy
- CSS Protective Behaviours Curriculum Policy
- CSS Risk Management Policy and Risk Management Register.
- CSS Volunteers Policy and Procedures for Engaging Volunteers
- CSS Work Health & Safety Policy

Definitions

CCTV or Closed-Circuit Television is a private video surveillance system that transmits signals to a limited number of monitors for security and monitoring.

Policy Statement

CSS has installed and uses a CCTV video surveillance system which is compliant with Australian Standards. This system operates 24 hours a day, which includes daytime safety and after hours security monitoring.

A Privacy Impact Assessment (PIA) has been used to evaluate the necessity, proportionality, and risks of surveillance. Annual audits (November) will determine whether cameras should be added, removed, or repositioned.

All surveillance collected is compliant with legislation and with respect for individual privacy.

Scope of Surveillance

Cameras are installed in outdoor (external) locations, positioned to monitor the school site entry points, car parks, and other external assets.

Surveillance is not conducted in any internal areas of the school buildings or other internal assets on the school site.

Surveillance is not conducted in areas where individuals have a reasonable expectation of privacy, such as:

- Toilets
- Change rooms
- Staff rooms
- Classrooms during teaching hours
- Counselling or medical treatment areas

Surveillance is not used to monitor staff or children's performance.

Privacy Compliance

This policy complies with:

- Surveillance Devices Act 1998 (WA): prohibits surveillance of private activities without consent.
- Privacy Act 1988 (Cth) and the Privacy and Other Legislation Amendment Act 2024 (Cth): governs the collection, use, and disclosure of personal information, including video

footage. Australian Privacy Principles (APPs): apply to schools with a turnover of \$3 million or more, or those handling sensitive personal information.

The school will ensure:

- Privacy Impact Assessments (PIAs) are conducted before installing or modifying surveillance systems, especially in indoor areas.
- Signage is prominently displayed at all entry points and monitored areas. Signs must be visible and state that CCTV is in operation and, include contact details for privacy queries.
- Notification of surveillance will be included in the school information booklets, enrolment documentation, Staff contract letters and as a general statement on the school website.
- Written parental understanding is obtained at enrolment for any surveillance that may capture children's images during school hours.
- Surveillance footage is stored securely, with access restricted to authorised personnel.
- Retention periods for footage are limited to 31 days, unless required for investigations. If the footage has not been accessed for any reason identified in this policy, the footage will be deleted. Where a section of footage has needed to be accessed or retained for ongoing legal or record keeping requirements, the footage will be stored safely in line with current record keeping and records storage requirements as specified by the State Records Office WA.

Disclosure of footage occurs only:

- With lawful authority (e.g. Police requests)
- As required by law
- In accordance with this policy (see guidelines and procedures)

Access and Oversight

Only the Co-Principals or their delegate may access recorded footage.

- The Co-Principal may provide footage to law enforcement upon lawful request.
- All staff are trained in surveillance protocols and privacy obligations.
- An annual review of the surveillance system will be conducted to assess effectiveness, compliance, and value for money.
- The CCTV Video monitor/s are installed in a secure area, inaccessible to the public.
- Access to CCTV footage is restricted with logs of access maintained. (see Appendix 3)
- The CCTV/Video Surveillance System is protected against unauthorised access or hacking.
- Tampering with surveillance equipment is prohibited and may result in disciplinary action.
- Viewing by third parties is only permitted on-site and in accordance with legal requirements. (see Guidelines and Procedures)

Policy Review

All policies are reviewed and amended in accordance with the *CSS Policy on Policies* and the *CSS Policy, Guidelines, Procedures and Frameworks Register*.

This policy and associated guidelines will be reviewed annually; provided that an earlier review is undertaken whenever a matter or other information becomes evident regardless of indicators or not, there has been a policy or procedural failure.

Appendices

Appendix 1	Child Side Playgroup and School CCTV/Video Surveillance Guidelines and Procedures
Appendix 2	Child Side Playgroup and School : Managing A Request for CCTV/Video Surveillance Vision (Record and Documentation)
Appendix 3	Child Side Playgroup and School : CCTV Access Log Framework

Version Management

VERSION	DATE REVIEWED	DATE RATIFIED	CHANGES MADE	AUTHOR OF CHANGES	NEXT REVIEW DATE
1	November 2025	3/12/2025	Policy developed	JM	November 2026

Child Side Playgroup and School CCTV/Video Surveillance Guidelines and Procedures

Guidelines

Under the Privacy Act, video footage is considered personal information under the law if individuals are identifiable.

Children cannot legally provide informed consent for surveillance. Written parental consent is required particularly in relation to internal areas like sick bays, therapy rooms or independent work rooms.

CCTV installers or servicing providers are required to be licensed under the Security and Related Activities (Control) Act 1996 (WA) if they are remunerated for their service.

Surveillance footage is stored securely, with access restricted to authorised personnel. CSS authorised personnel are the Co-Principals, the Chair of the Governing Council, and a delegate of the Co-principals.

An insurance review should be carried out prior to installation, upon modification of the system and at each insurance review period to confirm that the surveillance system is covered under the school's insurance policy.

The CSS *Risk Management Register* should be updated annually as a result of the review of the CCTV Surveillance system and school processes.

The school's IT management company will provide advice, recommend processes, and enact security required to store and protect the video surveillance system and its contents.

Procedures

Requests for access to CCTV Footage

Requests From Parents/Guardians

Parents/guardians can request access to CCTV footage involving their child, but access is subject to strict conditions. Footage may be disclosed to parents only if:

- The request is lawful and aligns with the school's CCTV/Video Surveillance Policy.
- The footage does not compromise the privacy of other individuals.
- The request should be made in writing* to the Co-principals and should include a valid reason** (e.g. safety concern or incident investigation)

*a text message is not considered an acceptable written request. A written request must be a hard copy letter or an email including the full name of the individual making the request and also include contact information in addition to their email address. (Full residential address, phone contact number)

** the school will enact an investigation in relation to any reasons received; claims of safety concerns or incidents requiring access to CCTV footage.

Disclosure (viewing) of CCTV footage by parents/guardians is permitted on-site only, under supervision, and in accordance with legal and privacy obligations. Parents/guardians are not permitted to view footage off-site or receive a copy of the footage unless required by law or via legal proceedings.

Process for Addressing Requests from Parents/Guardians

- The Co-Principal or their delegate will manage and facilitate the request.
- Refer to the CCTV/Video Surveillance Policy for guidance and process.
- Assess whether the disclosure complies with privacy laws and does not infringe on others' rights.
- Document the request, the reasons for provision provided, any disclosures made, the process followed and any other actions taken. (see Appendix 2)

If the footage includes other children, staff, or others, the school must protect the privacy of all individuals. If others are identifiable, footage may need to be redacted, or access denied unless lawful authority (e.g. police) is involved.

Requests From School Staff (paid/unpaid), volunteers, practicum teachers, work placement students)

School Staff can request access to CCTV footage involving an incident relevant to themselves, specifically in relation to a safety issue, including school property access breaches. Access is subject to strict conditions. Footage may be disclosed to staff members only if:

- The request is lawful and aligns with the school's CCTV/Video Surveillance Policy.
- The footage does not compromise the privacy of other individuals.
- The request is made in writing* to the Co-Principals or the Chair of the Governing Council (GC) and should include a valid reason** (e.g. safety concern or incident investigation).
* a text message is not considered an acceptable written request. A written request must be a hard copy letter or an email including the full name of the individual making the request and also include contact information in addition to their email address. (Full residential address, phone contact number)
** the school may enact an investigation in relation to any reasons received; claims of safety concerns or incidents requiring access to CCTV footage.

Disclosure (viewing) of CCTV footage by a staff member is permitted on-site only, under supervision, and in accordance with legal and privacy obligations. A staff member is not permitted to view footage off-site or receive a copy of the footage unless required by law or via legal proceedings.

Process for Addressing Requests from School Staff

- The Co-Principal, Chair of the GC or their delegate will manage and facilitate the request.
- Refer to the CCTV/Video Surveillance Policy for guidance and process.
- Assess whether the disclosure complies with privacy laws and does not infringe on others' rights.
- Document the request, the reasons for provision provided, any disclosures made, the process followed and any other actions taken. (See Appendix 2)

If the footage includes other children, staff, or others, the school must protect the privacy of all individuals. If others are identifiable, footage may need to be redacted, or access denied unless lawful authority (e.g. police) is involved.

Requests From Lawyers

A lawyer can request access to CCTV footage. Access is only granted under specific conditions. The school must ensure:

- The request is made with lawful authority, such as under subpoena, court order, or formal legal correspondence.
- The disclosure complies with the Privacy Act 1988 (Cth), the Privacy and Other Legislation Amendment Act 2024 (Cth), and the Surveillance Devices Act 1998 (WA).
- The footage does not infringe on the privacy rights of other individuals unless legally justified.

Parental consent is not required before releasing footage involving a child if the request is made under lawful authority (e.g. subpoena). However, consideration should still be made regarding privacy implications and seek legal advice before proceeding.

Process for Addressing Requests From Lawyers

- The Co-Principal or their delegate will manage and facilitate the request.
- Refer to the CCTV/Video Surveillance Policy for guidance and process.
- Verify the lawyer's authority to request the footage.
- Seek independent legal advice through ASISWA if the request involves sensitive content or potential legal risks.
- Ensure the footage is only disclosed to the extent necessary and in accordance with the CCTV/Video Surveillance Policy.
- Document the request, the legal basis provided, any disclosures made, the process followed and any other actions taken.(see Appendix 2)

A lawyer's request can be refused if:

- The request lacks legal basis or formal authority.
- Disclosure would breach privacy laws or compromise the rights of other individuals.
- The footage is no longer available due to retention limits (31 days).

Requests From the Police.

Police may request footage as part of an investigation or under lawful authority. Footage may only be disclosed:

- In response to a formal request (e.g., written request, subpoena, or warrant).
- If the request complies with the Privacy Act 1988 (Cth), the Surveillance Devices Act 1998 (WA), and the school's own Video Surveillance Policy.

Parental consent is not required before releasing footage to police if the request is lawful. However, consideration should still be made regarding privacy implications and the disclosure documented.

Police may request and view footage on-site without a warrant. Access may be granted only if the Principal, or their delegate voluntarily agrees, and the request is lawful. Otherwise, a warrant or formal legal authority is required.

Footage from areas with a reasonable expectation of privacy (e.g. therapy rooms, staff rooms) should not be disclosed unless legally compelled and reviewed by legal counsel (via

AISWA)Process for Addressing Requests from Police

- The Co-Principal or their delegate will manage and facilitate the request.
- Refer to the CCTV/Video Surveillance Policy for guidance and process.
- Verify the identity and authority of the requesting officer.
- Confirm the legal basis for the request.
- Document the request, the legal basis provided, any disclosures made, the process followed and any other actions taken. (see Appendix 2)
- Ensure only relevant footage is disclosed, protecting the privacy of uninvolved individuals.

Preparing/Sourcing Vision for Disclosure (viewing or copying)

- The Co-Principal or their delegate will maintain dedicated, blank data sticks for the purposes of copying requested vision. These should be securely stored with the CSS *CCTV/Video Surveillance Access Log*.
- Disclosure (viewing) of any vision will be managed from a data stick copy only, not from the surveillance system directly or any other school hard drive files or share drive files.

Process for preparing vision for disclosure

- The Co-Principal or their delegate will source and prepare vision for disclosure.
- Vision will be sourced/identified in accordance with the approved request and this access recorded in the CCTV access log.
- Raw vision will be uploaded to a dedicated secure file on the school share drive via the Co-Principal's or delegate's device, and trimming, redaction and/or or capturing of the vision (photos) be carried out (if required) to meet the authorised request. The vision will be designated a unique file name, saved in the file, and then copied on to a data stick for viewing or to provide an authorised copy. Only authorised requested vision will be provided on the data stick.
- The original prepared vision provided for an authorised request will be maintained in accordance with current record keeping and records storage requirements as specified by the State Records Office WA.
- The vision copied onto a data stick for the purposes of disclosure (viewing), will be deleted immediately after the disclosure and the blank stick returned to the access log for future use.

Child Side Playgroup and School : Managing A Request for CCTV/Video Surveillance Vision (Record and Documentation)

This document will be maintained as an original in the ACCESS LOG File. No copies should be made.

REQUEST DETAILS
Date of Request
Person Managing the Request (Full Name, Title)
Person Making the Request (Full Name, Title)
Parent <input type="checkbox"/> Individual and status verified ? Yes/No
Staff Member <input type="checkbox"/> Individual and status verified ? ID provided if not part of school staff (attach copy)
Legal Representative <input type="checkbox"/> Individual and status verified ? ID provided (attach copy)
Police <input type="checkbox"/> Individual and status verified ? ID provided (attach copy)
Contact Information
Address
Contact number
Service/Business Name
Email address
Request Received (attach hard copy)
Request received in writing (letter, email) <input type="checkbox"/>
Verbal Police Request <input type="checkbox"/>
Police subpoena, or warrant <input type="checkbox"/>
Legal subpoena, court order, or legal correspondence <input type="checkbox"/>
Details of Request
Disclosure is sought for the following Individual /individuals :
Name
Status : Child , Staff Member, Parent/guardian, School Visitor, Other -
Address
Contact number
Type of Disclosure Requested
Seeking CCTV Footage <input type="checkbox"/>
Seeking CCTV photographs <input type="checkbox"/>
Date of incident
Time of incident
Description of incident

Processes Followed	
	Person Managing the Process (Full Name, Title)
1	CSS CCTV/Video Surveillance Policy has been referred to? Yes/No
2	Identity and/or authority of the requesting person has been verified ? Yes/No
	How was the verification confirmed ? ID provided/ referee has confirmed ID/ personal details confirmed/other -
3	Confirm the basis for the request. (describe)
	Safety concern <input type="checkbox"/>
	Incident investigation <input type="checkbox"/>
	Confirmation of attendance at the school site <input type="checkbox"/>
	Other -
4	View the requested CCTV to assess and confirm the vision required Yes/No
5	Assess the basis for the request
	Request has been made appropriately (in writing ,verbal – Police , legal document) Yes/No
	Request is lawful. Yes/No
	Request aligns with the school's CCTV/Video Surveillance Policy Yes/No
	Request is made with lawful authority (under subpoena, court order, or formal legal correspondence) Yes/No
	Request includes a valid reason Yes/No
	Requested does not compromise the privacy of other individuals Yes/No
	Request does not infringe on the privacy rights of other individuals unless legally justified. Yes/No
5	Seek independent legal advice through AISWA if the request involves sensitive content or potential legal risks.
	Contact Name and title
	Organisation
	Contact number
	Date/s of contact
	Notes – attach hard copy of advice or determination received if necessary
6	Access of Requested Vision – Granted Proceed to preparing the vision and the disclosure meeting or provide the vision . Log access
	Access of Requested Vision - Denied
	State reasons

