



Council buildings CCTV Operational Procedure 2019

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Purpose

The Building CCTV Operational Procedure supports the CCTV in Council Buildings Policy by defining the operational requirements and processes that ensure the appropriate management, process and use related to viewing, copying and disseminating CCTV footage.

This Procedure applies to:

- all City of Port Phillip staff, authorised officers and CCTV specialist contractors engaged by City of Port Phillip.
- the operation of CCTV cameras located in and on Council operated buildings and all captured and/or stored electronic CCTV footage.

This Procedure does not apply to:

- the South Melbourne Market (SMM) and
- Crime Prevention CCTV in the public realm.

South Melbourne Market operate under the SMM CCTV Operational Procedure.

Compliance with this document is mandatory, and the processes and procedures defined will be audited periodically, in accordance with relevant legislation.

Outcomes

Outcomes expected to be achieved include:

- Compliance with laws and regulations
- Consistent decision making and policy application
- Effective use of time and resources

Definitions

Table 1: Definitions of terms

Term	Definition
APP	Australian Privacy Principle within the meaning of the Privacy Act 1988 (Cth).
Authorised CCTV Officers	City of Port Phillip employee who has been authorised by the Council Security Advisor to carry out specific tasks in the operation or management of the CCTV System.
CCTV	Closed Circuit Television
CCTV Records/Footage	Any information that is recorded or unrecorded that is taken from a CCTV system including any data, still images or moving footage.



Term	Definition
CCTV System	A surveillance system in which a number of 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.
CoPP	City of Port Phillip Council
Disclosure	Provision of releasing CCTV footage and records to third parties.
FOI	Freedom of Information (reference to the Freedom of Information Act 1982 (Vic))
Content Manager	City of Port Phillip Records Management System which manages the retention and storage of Council Information
Public Place	Any place which the public has access as a right or by invitation, whether expressed or implied and whether or not a charge is made for admission to the place.
Security Advisor	Council's Facilities Assurance Lead

Responsibilities

Table 2: Responsibilities of roles

Role	Responsibility
Security Advisor	<ul style="list-style-type: none">• Implementation and ongoing management of the CCTV in Council Buildings Policy.• Implementation of the Council Buildings CCTV Operational Procedure.• Ensure CCTV equipment is maintained regularly.• Co-ordinating CCTV induction and training for authorised employees.• Reviewing and evaluating this Procedure and related forms while maintaining compliance with the Privacy Act, Surveillance Act and associated legislation.• Auditing and reporting on CCTV related information identified in this Procedure.
Authorised CCTV Officers	<ul style="list-style-type: none">• Ensure this procedure and other relevant Council policies are correctly adhered to• Ensure the operator's personal user name and password is properly and securely managed.



Role	Responsibility
	<ul style="list-style-type: none">• Ensure operators do not disclose their personal user name and password to any other staff/contractors.• Maintaining compliance with the Privacy Act, Surveillance Act and associated legislation.

Procedure

CoPP's CCTV infrastructure and protection of data in which it collects, must be compliant with relevant legislation. The following processes described below enable effective and compliant management and operation of CCTV systems managed by CoPP.

Internal request for building CCTV Footage

Any internal requests regarding Building CCTV footage must be:

- Requested via Council's CCTV Footage Request Form
- Approved by the requestee's manager prior to submission.
- Submitted, via email, to the CCTV Footage Request Helpdesk at helpdeskcctv@portphillip.vic.gov.au managed by CoPP's Security Advisor.

All requests must be approved by Council's Security Advisor prior to release of information and footage.

Where the footage is determined to be a potential criminal matter, the external request procedure must also apply.

All relevant information shall be added to the Building CCTV Footage Request Register.

External request for building CCTV Footage

Requests from members of the public shall be redirected to Victoria Police. Correspondence from Victoria Police will be required before specific requests from the public to view CCTV footage can be considered.

Any incidents of a criminal nature must be referred to the Victorian Police for further investigation.

Requests from law enforcement agencies shall be submitted via the CCTV Footage Request Form an submitted, via email, to Council's CCTV Footage Request Helpdesk at helpdeskcctv@portphillip.vic.gov.au.

All requests must be approved by Council's Security Advisor prior to release of information and footage.



Copying, collection, retention and destruction of CCTV footage

Where a copy of electronic data provided to a third party, such as Victoria Police, it will be the third parties responsibility to retain the record in accordance with the disposal authority that covers their agency's functional responsibilities.

Disclosure of information must only occur in accordance with Privacy Principle 6.

Recorded material will be retained for 31 days unless it is the subject of an application and shall be overwritten as per a system cleansing cycle.

Viewing of building CCTV footage

Council's Security Advisor or an Authorised CCTV Officer shall update the Building CCTV Footage Request Register with the relevant information regarding requests made to view or access CCTV footage.

Viewing of footage will take place in a private location under supervision of Council's Security Advisor or Authorised CCTV Officer.

Approved access will be for viewing purposes only. No copies of footage are to be provided to staff members.

The privacy of individual/s featured on the footage will be maintained at all times.

Accountability

In accordance with the Auditor General and the Department of Justice's auditing requirements, Council are required to audit the operations of CCTV to keep operators accountable to legal and ethical obligations, and to prevent misuse of information. This is ensured by:

- The Building CCTV Footage Request Register being utilised to record the times live surveillance is conducted and by whom. The CCTV system will be audited to ensure compliance.
- All CCTV anomalies shall be recorded and reported immediately to Council's Security Advisor and noted.
- All breaches of Policy, Operational Procedures and supporting protocols shall be reported to Council's Security Advisor.
- Maintaining awareness of regulatory compliance and non-compliance penalties as they relate to the proper management of CCTV technology.

Building CCTV Systems (New and Existing)

Changes or modifications to a Council CCTV system including hardware, camera positions or the number of cameras are to be reviewed and approved by Council's Security Advisor in writing before implementation.



The implementation of new CCTV systems or equipment in Council facilities are also required to be reviewed and approved by Council's Security Advisor in writing before implementation.

Governance

All CCTV related requests, incidents and other related information shall be reported to the City of Port Phillip Strategic Risk & Internal Audit Committee monthly.

Confidentiality/Privacy

Privacy of all information associated with CoPP's CCTV operations including, but not limited to, all information observed, recorded, discussed, reported, and written is to be maintained at all times. Please refer to City of Port Phillip's Privacy Policy.

Record Keeping

Records will be maintained in line with legislation and best practice guidelines by:

- Noting and accurately recording all potential or observed incidents on Council's incident reporting system DoneSafe,
- All requests to view or obtain building CCTV footage shall be via completing and submitting the CCTV Footage Request Form.
- Ensuring no unauthorised access to the CCTV system and/or records has been made.
- The CCTV system and relevant records will be audited against the above procedures.

Inappropriate Use and Complaint Management

Failure to follow these Council procedures will be subject to investigation which may lead to disciplinary action and potential legal ramifications.

Any public complaints in relation to any aspect of a CCTV system managed by Council must be made in writing or email to Council's Security Advisor.



Relevant policy, regulations or legislation

Related Internal Policies

- CCTV in Council Buildings Policy
- Building Security Policy (Draft)
- CoPP Employee Code of Conduct
- CoPP Privacy Policy
- Corporate Records Disposal Policy
- Occupational Health & Safety Policy

Related Legislation and Governance

- Privacy Act 1988
- Privacy and Data Protection Act 2014
- Surveillance Devices Act 1999 (Vic)
- Private Security Act 2004
- Freedom of Information Act 1982 (Vic)
- Evidence Act 2008
- Occupational Health and Safety Act 2004 (Vic)
- Occupational Health and Safety Regulations 2017 (Vic)
- Charter of Human Rights and Responsibilities Act 2006
- AS4806.1 – Closed Circuit Television (Part 1) Operation and Management
- AS4806.2 – Closed Circuit Television (Part 2) Application Guidelines

Attachments

- Building CCTV Footage Request Form
- Building CCTV Footage Request Process Map



Attachment 1 - Building CCTV Footage Request Process Map

