

ST DOMINIC'S PRIORY COLLEGE

# CCTV VIDEO & AUDIO SURVEILLANCE POLICY

LAST REVIEW DATE	NEXT REVIEW DATE
October 2024	October 2027
RESPONSIBLE OFFICER	College Principal

St Dominic's Priory College Ltd | Est 1884 | ABN: 25 085 110 379 | CRICOS: 01102G



## **OUR MISSION**

A Catholic College educating girls in the Dominican Tradition.

#### **OUR VISION**

Inspired by the Gospel of Jesus Christ, we are a girls' College committed to truth and compassion. In the spirit of St Dominic, we contemplate the possibilities and honour the sacred dignity of each person through word and action. We aspire to provide an innovative, rigorous and inclusive education that leads girls and young women to achieve excellence in their studies and confidence in their future.

# **OUR VALUES**

As a Dominican community we value:

- A sense of the sacred; joyful, eucharistic and reflective.
- A love of learning through creative and critical thinking.
- Modelling a eucharistic community as the basis of transformation.
- Teaching the truth, by word and example.

Further information about the College's principles and objectives can be found within the <u>2021 – 2025 Strategic Plan.</u>

# **GOVERNANCE**

Dominican Education Australia (DEA) is the governing authority of St Dominic's Priory College, an independent Catholic School. A Board of Directors, established in 1987, governs the College which is incorporated under the Corporations Act 2001 (Cwlth). The Trustees of DEA and the College Board of Directors assure our Catholicity, fidelity to the Dominican charism, formation of Board members, excellence in teaching and learning and financial stability.

For more information about DEA visit: <a href="https://dominicaneducationaustralia.com/">https://dominicaneducationaustralia.com/</a>

#### **CHILD SAFE**

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We are a Child Safe employer and are committed to the welfare and protection of children and young people. The College is committed to upholding a diverse and inclusive learning environment, ensuring children and young people are valued and respected. In accordance with the National Catholic Safeguarding Standards, all employees are required to comply with the College's relevant policies and procedures.

To read the College's Safeguarding Commitment Statement in full, and access College Policies, Procedures and other resources, please click here.

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# 1. PURPOSE AND SCOPE

- 1.1 To establish a policy for the use of CCTV video and audio surveillance ("Surveillance") optical or video surveillance devices ("Surveillance Devices") at St Dominic's Priory College.
- 1.2 To support compliance with the Surveillance Devices Act and protect the lawful interests of St Dominic's Priory College (for example, use of Surveillance to monitor incursions onto, and damage to school property, and as a contributor to staff and student safety).
- 1.3 This policy applies to all students, staff, families and visitors to the College and extends to all school activities, including curriculum extension activities, out-of-normal school hours and official school functions.

# 2. RATIONALE

- 2.1 In realising our mission and vision and recognising our moral and legal obligations, St Dominic's Priory College aims to provide a safe, secure, and healthy environment for all its students.
- 2.2 This policy is embedded within a whole school strategy aimed at promoting compliance with the Surveillance Devices Act, supporting the safety of students, staff, families and visitors.

## 3. **DEFINITIONS**

#### 3.1 **CCTV**

CCTV means Closed Circuit Television and in the context of this document includes all equipment used to record and store video and/or audio for the purposes of surveillance and protection of school property.

# 3.2 **CEO**

CEO means the Adelaide Catholic Education Office.

#### 3.3 **CESA**

CESA means Catholic Education South Australia, including any School or the CEO, as the context may permit.

# 3.4 ICT

Information and Communications Technology is a term that includes any facilities used to compute, communicate and to store information electronically. This may include and is not limited to desktop, laptop, and tablet computers, computer servers, electronic storage devices, network and telecommunications equipment and associated software.

#### 3.5 SACCS

South Australian Commission for Catholic Schools.

# 3.6 **STAFF**

"Staff" means any employee of St Dominic's Priory College, including contractors, casual staff and outsource-provided staff with contact with St Dominic's Priory College-provided ICT facilities.

# 3.7 DESIGNATED ST DOMINIC'S PRIORY COLLEGE STAFF

Means that information collected via CCTV footage will be accessible only by the Principal, Business Manager and Deputy Principal.

#### 3.8 STUDENTS

"Students" means any enrolled child/young person at the College.

#### 3.9 SURVEILLANCE

Refers to audio or optical surveillance and includes the use of CCTV.

#### 3.10 SURVEILLANCE DEVICE

Refers to any type of device used for Surveillance and includes CCTV.

# 4. REQUIREMENTS OF THE SURVEILLANCE DEVICES ACT

4.1 The *Surveillance Devices Act* prohibits the installation, use, and maintenance of Surveillance Devices. A range of exceptions to the prohibition apply.

Relevant exceptions are that:

- 4.1.a the use of a Surveillance Device must be reasonably necessary to protect the lawful interests of the School; or.
- 4.1b the use of a Surveillance Device must be in the public interest.
- 4.2 St Dominic's Priory College will normally be able to satisfy the exception allowing Surveillance for the protection of lawful interests. Protection of lawful interests would include protection of College property and the safety of students and staff.
- 4.3 The Surveillance Devices Act also restricts the communication or publication of information or material derived from use of Surveillance Devices. Use and disclosure must only be made in limited circumstances including disclosure:
  - 4.3a to a person ("participant") who participated in the recorded activity or conversation:
  - 4.3b or with the consent of each participant;
  - 4.3c or to an officer of an investigating agency for the purposes of a relevant lawful investigation;
  - 4.3d or in a situation where a person is subjected to violence or there is an imminent threat of violence.

# 5. POLICY

It is St Dominic's Priory College policy that the use of Surveillance in the school environment is to be employed in the following consistent manner:

- 5.1 Surveillance is to be conducted in accordance with the law for the purposes of monitoring and recording activity within the physical school boundary and public places around the perimeter of school grounds;
- 5.2 Use of a Surveillance Device must be to protect the lawful interests of St Dominic's Priory College or in the public interest;

- 5.3 Surveillance is to be conducted in the interests of protection of school property, safety and as a deterrent to undesirable behaviour by persons on or near school grounds;
- 5.4 The collection, storage and use of personal information collected through the use of Surveillance will comply with the *Australian Privacy Act (Cth)* and in accordance with the Australian Privacy Principles (APPs).

# 6. ROLES AND RESPONSIBILITIES

- 6.1 Implementation of Surveillance infrastructure at St Dominic's Priory College may be approved by the School Principal under the following conditions:
  - 6.1a A formal proposal containing all pertinent detail is prepared;
  - 6.1b A Privacy Impact Assessment (PIA) is conducted by the school, and approved by the Principal;
  - 6.1c Equipment proposed meets SACCS approved standards as exists at the time of purchase and installation.
- 6.2 In the case of established Surveillance infrastructure, Schools are required to conduct a Privacy Impact Assessment to ensure continued compliance with the *Australian Privacy Act (Cth)*;
- 6.3 Cabling and cable protection conform to AUSTEL technical standards as they exist at the time:
- 6.4 Video or audio traffic must be carried by separate cable or virtual private network to that of the schools local area network;
- 6.5 Video data in transit is to be encrypted end to end with industry standard encryption in accordance with SACCS approved standards;
- 6.6 Stored video or audio (data at rest) is to be encrypted with industry standard encryption technology in accordance with SACCS approved standards;
- 6.7 Access to the live feed or recorded video or audio requires written permission from the Principal observing the principle of access of least privilege and associated with the lawful interests of the school. Access is to be strictly managed, with all access logged for audit purposes;
- 6.8 The School will ensure access to the video and/or audio equipment used for recordings is restricted to staff required to manage the infrastructure;
- 6.9 Video and audio recordings are kept for a designated period before being securely destroyed, in accordance with privacy principles and following the procedures developed by the School;
- 6.10 For all proposed and existing Surveillance installations, the School will undertake and document a risk analysis, and develop a policy and procedures to regulate access to content created using Surveillance.
- 6.11 School policy and procedures addressing Surveillance are to specify access provisions in accordance with the *Surveillance Devices Act 2016 (SA)*. Disclosure of content to be prohibited with exceptions for the following:
  - 6.11a disclosure to the police or officers of an investigating agency for the purposes of a relevant lawful investigation;

- 6.11b disclosure authorised by a judge;
- 6.11c disclosure to the person who was a party to the activity or their parent/caregiver;
- 6.11d disclosure with consent of each person involved in the recorded activity;
- 6.11e disclosure in relation to a situation in which a person is being subjected to violence or there is an imminent threat of violence to a person.
- 6.12 Students, staff, parents, guardians, and/or other adults responsible for students at the School are to be informed that video surveillance will be in operation;
- 6.13 Clear and visible signage must be placed at appropriate entry points and throughout the school to ensure all persons entering or in proximity to the school grounds can be reasonably expected to be aware that Surveillance is in operation.

# 7. CAMERA LOCATIONS

Cameras are located in the following locations:

- 7.1 Adams Mayo BASEMENT level
  - 7.1a 1 x in each Sports Shed (2 in total)
  - 7.1b 1 x in Maintenance Workshop
  - 7.1c 1 x in foyer
  - 7.1d 1 x in Storage area
  - 7.1e 2 x Lift
- 7.2 Adams Mayo GROUND level
  - 7.2a 2 x Terrace
  - 7.2b 2 x College Reception (1 exterior, 1 interior)
  - 7.2c 4 x Adams Mayo thoroughfares, including entry points (2) and base of stairs (2)
  - 7.2d 2 x Adams Mayo Library
  - 7.2e 2 x College Staff Room (1 x main Staff Room; 1 x Butler's Kitchen)
- 7.3 Adams Mayo SECOND level
  - 7.3a 1 x Outside Makerspace
  - 7.3b 1 x top of staircase(s)
  - 7.3c 1 x Balcony
- 7.4 Adams Mayo THIRD level
  - 7.4a 1 x in each Instrumental Tuition room (AM201, AM202 and AM203)
- 7.5 Sr Jillian Havey Senior Centre ("Year 12 Centre")
  - 7.5a 3 x external cameras (rear of centre, outside external change room entrance, front of building with view of driveway and carpark)
  - 7.5b 1 x in each of the Classrooms, meeting rooms, and prep areas (7 in total)
  - 7.5c 2 x in each hallway, breakout area(s), and Common Room (8 in total)

# 8. RELATED DOCUMENTATION

The policies, codes and procedures listed below complement and support St Dominic's Priory College's CCTV Video and Audio Surveillance Policy:

St Dominic's Priory College Privacy Policy

St Dominic's Priory College Safeguarding Children and Young People Suite:

- Safeguarding Children and Young People Commitment Statement
- Safeguarding Children and Young People Policy
- Safeguarding Children and Young People Code of Conduct
- Safeguarding Children and Young People Terms of Reference

St Dominic's Priory College Child & Young Persons Safe Environment Policy

SACCS Information Security Policy

SACCS Information Security Framework

SACCS Privacy Policy

SACCS Data Encryption Guideline and Standard

Surveillance Devices Act 2016

St Dominic's Priory College and CEO policies and procedures as appropriate

# 7. REVISION RECORD

Document Title	CCTV Video and Audio Surveillance Policy							
Document Type	Policy							
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