



Closed Circuit Television (CCTV) Policy and Procedure

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Purpose:	This policy guides the operation, use and management of the closed-circuit television (CCTV) at Sinai College and is made in accordance with all relevant legislation.	
Scope:	School Board members and staff	
Status:	Approved	Supersedes:
Authorised by:	Board Chair	Date of Authorisation: 25/03/2025
References:	<ul style="list-style-type: none"> • Australian Privacy Principles • Invasion of Privacy Act 1971 (Qld) • The Privacy Act (1988) • OIC Qld Camera Surveillance and Privacy • OIC Qld Camera Surveillance, Video and Audio Recording – A Community Guide 	
Review Date:	Annually	Last Updated: 03/01/2026
Policy Owner:	School Governing Body	Next Review Date: 03/01/2027

Statement of Purpose

The purpose of this policy is to provide for the management, operation and use of closed-circuit television (CCTV) at Sinai College (the College).

Data collection, storage and use will be conducted in accordance with the College's Privacy Policy and will comply with relevant laws.

Scope

The College has a duty to create and maintain a safe and secure teaching and learning environment for students, staff and community members involved in College programs or the general operation of the College. The College also has a requirement to protect its property and facilities against inappropriate behaviour such as trespass, vandalism and theft. In the event of inappropriate behaviours on the College campus, the ability to identify persons on site is an important part of an investigation process.

A CCTV system assists the College in fulfilling these objectives.

Sinai College has installed CCTV cameras on its site at 20 Moxon Rd, Burbank, Qld. These cameras are in operation 24 hours a day, 7 days a week and record inside and outside buildings, all play and recreation areas, spaces shared by Sinai College and the Community Centre as well as entry ways to private spaces. CCTV does not record inside bathrooms



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Definitions

For the purposes of this policy:

Closed Circuit Television (CCTV) – A network of cameras with a limited broadcast network used for a prescribed purpose. Footage may be recorded and retained for a prescribed period of time

Security Monitoring – CCTV may be monitored live by an approved authority, or footage may be accessed and viewed at a later date

(need to add more)

Responsibilities

College Board

- Write and maintain all policies and procedures relating to the use of CCTV

College Principal

- Ensure compliance with CCTV policies and procedures
- Liaise with stakeholders to ensure compliance and appropriate communications
- Manage installations, maintenance and upgrades to CCTV
- Manage access to CCTV data in compliance with all policies and legislation

Guidelines

CCTV may assist the College by

- Acting as a deterrent to unauthorised and/or unlawful entry onto the site
- Preventing and verifying incidents involving
 - Criminal behaviour including trespass, vandalism, property damage, or crimes directed at a person such as threats or actual violence
 - Potential breaches of College policies, procedures and codes of conduct
- Verifying incidents on College grounds to support an evidence-based response, including where
 - Loss, injury or damage has occurred
 - Allegations of inappropriate behaviour have been made
- Providing visual coverage during an emergency

CCTV will not be used to monitor



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- Individual work performance of staff or students
- Areas where privacy is to be expected, such as bathrooms and changerooms

CCTV locations and Notification of use

- Camera positioning has been carefully selected to ensure appropriate coverage without undue intrusion of privacy
- Cameras are not positioned to record areas where privacy is to be expected, such as bathrooms and changerooms, although the entrances may be recorded¹
- Appropriate signage is displayed to inform all people who access the College site that their image will be recorded in compliance with privacy legislation

Access to CCTV data

Sinai College may store CCTV data on site and/or on external (cloud-based) servers. The storage of this data is compliant with the Privacy Act

Live Monitoring

Live monitoring of CCTV will be available to approved College personnel who are on site and external, approved security monitoring organisations. Live monitoring of CCTV is for the purpose of improved security and safety.

Stored CCTV data

Historic stored data can only be accessed under strict conditions

- Normal CCTV data is stored for 90 days before being deleted
 - Normal data is that which does not require further review. Normal data collected on Day 1 will be deleted on Day 91
- Data that is required to be retained or reviewed will be securely stored on servers hosted within Australia
- Surveillance images will only be retained and reviewed if
 - there is a reasonable suspicion that an incident has occurred;
 - a complaint has been filed with the Principal or
 - a request has been received from Police or other security agency and this request is approved or is compliant with a subpoena.

¹ Section 227A of the *Criminal Code Act 1899* Qld makes it unlawful to visually record another person where privacy may be expected



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- CCTV footage is not provided to unauthorized persons, including parents, school staff and contractors even when that footage contains images of themselves or their child.

Making a Request to access CCTV data

Persons seeking access to CCTV data must make the request in writing and include

- Name of the applicant
- Date of the application
- Date and time range of interest
- Reason for the application (e.g. to determine the source of graffiti)

Authorised Persons

Live and stored data

- College Principal
- Board President
- Any person or agency as permitted by law (eg police, insurance provider, government agency, legal counsel)
- Other agencies as approved by the Principal following a request

Live data only

- College Administration