CLOSED CIRCUIT TELEVISION (CCTV) POLICY

Legislation / local law requirements	*Freedom of Information Act 1992* *General Retention and Disposal Authority for Local Government Information DA 2023-005* *Premiers Circular 2025/03 Registration of CCTV Systems* *Privacy and Responsible Information Sharing Act 2024* *State Records Act 2000* *Surveillance Devices Act 1998*
Relevant delegations	Not Applicable
Related policies, procedures and supporting documentation	Code of Conduct – Employee Complaint Management Policy Privacy and Information Breach Policy

PRELIMINARY

INTRODUCTION

In support of the City's vision to create a leafy and vibrant 24-hour City, Closed Circuit Television (CCTV) is used to enhance community safety and protect our public spaces. CCTV assists in deterring crime and anti-social behaviour while supporting a vibrant environment where people feel safe and protected.

PURPOSE

The purpose of this policy is to govern the management and operation of CCTV systems at the City.

OBJECTIVE

The City installs CCTV systems in public spaces and City facilities with the objectives of promoting public and staff safety, and minimising damage to or theft of City assets.

City officers performing regulatory functions may be provided with a body worn camera, with the objective of promoting public safety and minimising threats to public and City employees.

Vehicle mounted cameras may be used to enhance staff safety while providing a record of operational activities.

To the extent possible without reducing the effectiveness of the CCTV systems in achieving those objectives, the City will operate its CCTV systems in a way that protects the privacy of individuals.

SCOPE

This Policy applies to City owned and managed CCTV systems, body worn cameras and vehicle mounted cameras.

This Policy applies to all City employees who have the responsibility for the implementation, monitoring, access, use and disclosure of records from these systems.

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POLICY PROVISIONS

DEFINITIONS

CCTV system – includes any fixed system or mobile trailer mounted system installed by the City to electronically record video or video/audio of any public place or City facility.

Employees – includes City staff, contractors, volunteers and all others who perform work on behalf of the City.

POLICY

1. CCTV Principles

CCTV systems will be:

- installed only in locations where the system will promote public and staff safety, minimise damage, vandalism or theft of City assets, or prevent unauthorised entry to City facilities;
- operated with efficiency, impartiality and integrity; and
- operated in a way that is transparent and proportionate to the identified purpose, with due regard for individual privacy and limiting unnecessary surveillance.

Body worn cameras will be operated only by City officers conducting regulatory functions and operated with efficiency, impartiality and integrity.

2. Identification of Locations

CCTV installation decisions are made using a risk-based approach and supported by an appropriate business case to ensure resources are used effectively.

CCTV systems will be installed in locations where anti-social or criminal behaviour has been identified or installed as a proactive measure to minimise damage to City facilities or property and protect the safety of City staff.

3. Installation, Management and Maintenance

The Executive Director Infrastructure and Environment determines who is responsible for:

- selection of CCTV systems and their optimal placement within locations; and
- installation, management and maintenance of CCTV systems, including allocation of associated costs within agreed City budgets and contract management of service providers.

CCTV systems will be registered on Cam-Map WA operated by WA Police Force as per Premier's Circular 2025/03 Registration of CCTV Systems.

4. CCTV System Monitoring

City CCTV systems will primarily be used to collect information for use in regulatory and legal proceedings. In public facilities such as leisure centres, recreation centres and community venues, authorised staff may access and monitor CCTV systems in real time or retrospectively where required for:

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- community and staff safety, including supporting WA police investigations;
- incident response and emergency management, including locating lost or vulnerable persons;
- monitoring and responding to unlawful or inappropriate behaviour including theft, vandalism or damage;
- responding to alleged fraud, misuse of City time or resources, misconduct or breaches of the City's Code of Conduct;
- enforcement of conditions of entry including suspensions or bans, unlawful entry or misuse of memberships; and
- review of accidents, workplace health and safety incidents, complaints or insurance matters.

Monitoring may also occur during public events, high risk periods or where operationally necessary to maintain safety within the City.

Artificial Intelligence technologies may only be used within CCTV systems to assist in the detection of incidents that present an immediate risk to public safety or indicate potential criminal activity, or to support parking compliance or identify issues relating to the condition of City assets. Artificial Intelligence technologies must not be used to make automated decisions affecting individuals and must always be subject to meaningful human review and oversight.

Biometric identification may only be used at City Facilities to identify the entry of unauthorised individuals, or to assist in locating a missing person or person of interest when requested by WA Police and where there is a demonstrated safety need.

5. Body Worn Camera and Vehicle Mounted Camera Monitoring

Body worn cameras will primarily be used to collect information for later use in regulatory and legal proceedings. Body worn cameras and vehicle mounted cameras will not be monitored by the City on a "real time" basis, nor will the recordings be generally reviewed unless required in the prevention of anti-social behaviour, investigation of incidents, crime, complaints or staff conduct, or to facilitate a request for information.

6. Privacy

All CCTV systems, body worn cameras and vehicle mounted cameras are to be operated in a way that minimises the intrusion upon an individual's privacy whilst still allowing the system to serve the objectives for which it was installed. This will include:

- appropriate training of operators;
- secure storage, retrieval and destruction of CCTV, body worn camera and vehicle mounted camera data as set out in this policy; and
- the adoption of appropriate Cyber Security procedures, controls and technologies to prevent unauthorised access, use, modification or disclosure of records.

The City will not install CCTV systems inside areas where a person has a reasonable expectation of privacy, such as toilets or bathrooms. Clear and visible signage that states that CCTV cameras are in operation will be displayed in the area covered by the CCTV cameras and at other key points. The signage shall:

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- inform the public that cameras are in operation;
- allow people entering the area to make a reasonable approximation of the area covered by the system; and
- identify the City of Vincent as the owner of the system.

In some instances, where covert cameras are used during investigations of breaches to the City's Local Laws, signage will not be installed.

Body worn cameras will only be used in private settings or private dwellings where required to ensure the safety of City staff. Where safe and reasonable to do so, the City will verbally notify individuals of the use of a body worn camera.

CCTV system, body worn camera and vehicle mounted camera records will only be used or disclosed for the primary purpose for which they were collected, or used or disclosed for a secondary purpose that is related and reasonably expected, or required by law.

7. Authorised Access to CCTV Systems

Access to CCTV footage within the City is restricted to authorised personnel.

Authorised personnel may access CCTV systems only for purposes consistent with this policy. All access must be appropriate, proportionate and related to a City function or activity.

8. Destruction of Records

To minimise intrusion upon the right to privacy, unless further preserved under this policy or required by law all CCTV system, body worn camera and vehicle mounted camera records are to be destroyed in accordance with the General Retention and Disposal Authority for Local Government Information.

A record is to be further preserved under this policy if:

- the Manager Ranger Services believes preservation of the records is in the City's interest for any reason and is directly related to a function or activity of the City;
- the particular record is required as evidence in a potential legal proceeding, investigation or staff disciplinary process;
- a request to access the particular record is received from a law enforcement or government regulatory agency (for example WA Police Force, Department of Fire and Emergency Services, or another government body with the responsibility for enforcing laws);
- a request to access the particular record is received from any party other than a law enforcement or government regulatory agency under the relevant Act; or
- an extract of the record is made, whether or not that extract is provided to a third party.

9. Access to Records

To minimise intrusion upon the right to privacy, CCTV, body worn camera and vehicle mounted camera records will be kept confidential and provided to third-parties only when that provision is authorised by the CEO or delegate.

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CITY OF VINCENT

10. Transparency and Accountability

The City will publish in its annual report information including:

- The number and location of CCTV cameras;
- Any new surveillance technologies introduced; and
- The number of requests for footage by WA Police and other authorised agencies.

Where biometric identification technology is proposed, the City will publish a Privacy Impact Assessment prior to implementation, subject to the redaction of security sensitive or otherwise protected information.

OFFICE USE ONLY	
Responsible Officer	Manager Ranger Services
Initial Council Adoption	13/04/2010
Reviewed / Amended	17/11/2026
Next Review Date	16/11/2030