

Council Policy

CCTV POLICY

Date Adopted:	August 2026
Adopted By:	Council
Review Due:	August 2030
Responsible Officer:	Manager Business Systems and Transformation
Directorate:	People & Performance

PURPOSE

The purpose of this Policy is to provide a single, consistent framework for the installation, use, operation, and management of all Council Closed-Circuit Television (CCTV) systems, including those installed on Council buildings, facilities, infrastructure, and in public spaces.

The objectives of this Policy are to:

- Protect the safety of Council employees, Councillors, contractors, volunteers, and members of the public.
- Protect Council assets and property.
- Deter unlawful and antisocial behaviour and support the investigation of incidents.
- Ensure CCTV systems are managed lawfully, ethically, and transparently.
- Ensure appropriate management of CCTV footage, including access, privacy, security, retention, and disposal.
- Ensure Council's use of CCTV is compliant with relevant legislation.

This Policy is supported by the CCTV Procedure, which sets out the operational, technical, and administrative requirements for the day-to-day management of CCTV systems.

DEFINITIONS

SGSC or Council	The Southern Grampians Shire Council.
(ELT) Executive Leadership Team	ELT refers to Council's Chief Executive Officer (CEO) and Directors.
Employee/User	For the purposes of this Policy, an Employee/User is any employee, contractor, volunteer, or Councillor with a Southern Grampians account to access Council ICT systems.
Supervisor	The person to whom a role directly reports.
CCTV & Security Camera Systems	For the purposes of this policy, the term "CCTV" encompasses all types of security camera systems utilised by the Council. This includes closed-circuit television, network-based video

	surveillance, and associated technologies designed to capture and/or transmit video footage for monitoring and protection purposes. CCTV systems may employ various methods of transmission such as point-to-point, point-to-multipoint, mesh wireless, or encrypted internet connections. While the term originally referred to traditional closed-circuit setups, it now includes a broad range of technologies and configurations. Security cameras are deployed in public spaces, Council buildings, facilities, infrastructure, and other relevant areas. Their primary functions are to protect Council assets, deter criminal activity, and assist in investigations. This definition is inclusive of all components involved in the operation of CCTV systems. These components include cameras, recording devices, display units, transmission equipment, control systems, and both networked and cloud-based solutions.
Public Space	The Victorian Law Reform Commission, in its work on surveillance in public places, adopts the statutory Victorian definition of a “public place” as a location to which members of the public have access, whether as of right or by invitation. This access may be explicit or implied and applies regardless of whether an admission fee is charged. Based on this definition, Council offices and buildings are regarded as public places. As a result, the use of CCTV surveillance in these environments must adhere to all relevant State and Commonwealth legislation, Australian Standards, and applicable guidelines. Examples of Public Spaces Within the scope of this policy, a public space refers to any area that the public can enter by right or invitation, whether this is clearly communicated or implied. It is also irrelevant whether entry requires payment. Examples of public spaces include: • Streets • Parks • Halls • Museums • Galleries • Aquatic centres • Sports grounds • Libraries For the purposes of this Policy, areas within Council corporate buildings, depots, and waste management facilities that are not ordinarily accessible to the public are not considered public spaces. CCTV use in these locations remains subject to all privacy, surveillance, and workplace legislation.
Secure area	A location where personal information is protected against loss, misuse, and unauthorised access, use, and disclosure.

Incident	An occurrence that could result in harm to people, property, or Council operations.
Passive monitoring	Intermittent observation of live CCTV footage by authorised operators.
Retrospective review	Review of recorded CCTV footage after an incident has occurred.
Proactive CCTV	Live monitoring of CCTV footage, which may or may not be recorded.
Reactive CCTV	Recording and storage of CCTV footage for later review. This is the most common form of CCTV used by Council.
MOU	A memorandum of understanding, between Victoria Police and SGSC.

APPLICATION AND SCOPE

This Policy applies to:

- All CCTV systems managed by Southern Grampians Shire Council or contractors acting on its behalf.
- CCTV systems installed on Council-owned or leased property.
- CCTV systems installed in public spaces, including streets, parks, facilities, and other areas accessible to the public.
- Video capture systems on council vehicles used to meet service delivery requirements.
- All Council employees, contractors, and authorised third parties involved in the management or use of CCTV systems.

This Policy does **not** apply to:

- Commercial or private CCTV systems not owned or operated by Council.
- CCTV systems installed and operated exclusively by external agencies are excluded unless covered by a formal agreement, MOU, or contracted by Council to provide services.

GUIDING PRINCIPLES

Council's use of CCTV will be guided by the following principles:

- Southern Grampians Shire Council is committed to protecting people and assets on Council property, including using CCTV surveillance where necessary.
- The primary purpose of CCTV is used to deter and detect unlawful or antisocial behaviour around Council property and high-risk public areas, improving safety. Cameras record incidents involving threats to staff or public safety, theft, and unauthorised access. With CEO approval, SGSC staff may use footage to enhance service delivery.

- Surveillance should be necessary, proportionate, tied to a legitimate Council purpose, and CCTV systems must be managed consistently, fairly, transparently, and with evidence.
- CCTV is one element of a broader approach to safety, crime prevention, and service delivery.
- Alternatives to CCTV must be considered before new surveillance is implemented.
- People have a right to privacy, even in public areas. The cameras won't record or monitor employees' daily activities or evaluate their performance.
- Strong internal and external consultation and partnerships will be maintained, including with Victoria Police where applicable.

GENERAL PROVISIONS

1. CCTV OPERATIONS

- 1.1. Council operates CCTV systems to support community safety, asset protection, and service delivery.
- 1.2. CCTV use may include reactive recording for later review and, in exceptional circumstances, proactive or live monitoring where a clear safety or service delivery need exists.
- 1.3. CCTV systems must not be used to monitor routine employee performance or for purposes inconsistent with Council's functions, privacy obligations, or legislative requirements.
- 1.4. Council will take reasonable steps to inform the public when CCTV surveillance is in operation, including through appropriate signage.
- 1.5. Audio recording is higher risk and is restricted by law in public spaces and government buildings. CCTV will be video-only by default, and any audio capability must be disabled unless audio recording is approved under the CCTV Procedure, applicable legal requirements are met, and Council has documented that audio is lawful, necessary and proportionate (including a risk/privacy assessment).
- 1.6. Detailed operational requirements, including system configuration, monitoring arrangements, and technical controls, are set out in the CCTV Procedure.

2. PUBLIC SPACE CCTV

1. CCTV installation requests in public spaces are evaluated using the CCTV New Installation Request process; *see Council CCTV procedure for details.*
 - 2.1. The assessment will consider:
 - Purpose and responsibility of Council
 - Evidence of need and crime or safety data

- Consideration of alternatives to CCTV
- Stakeholder and community consultation
- Consultation with Victoria Police where relevant
- Whole-of-life and ongoing costs
- Legal, privacy, human rights, and data security impacts

2.2. A privacy and risk assessment must be undertaken prior to implementation for any new CCTV installation.

2.3. Recommendations for new CCTV installations will be submitted to the Executive Leadership Team (ELT) for approval.

3. ACCESS, USE, AND DISCLOSURE

3.1. Access to live or recorded CCTV footage is limited to authorised personnel. Access approvals must be requested, approved, and documented through the relevant forms and workflows. *See the CCTV Procedure for further details.*

3.2. Footage may only be used for the purpose for which it was collected.

3.3. Footage may be disclosed to Victoria Police or other lawful authorities where required for investigation or legal purposes.

3.4. Requests from members of the public to access footage must be managed through the Freedom of Information process.

3.5. Council has an MOU in place with Victoria Police granting direct access to some of Southern Grampians Shire Council CCTV cameras for community safety and criminal activity response.

3.6. Council will record all CCTV access and proactively audit it at least once a year.

3.7. Chief Executive Officer (CEO) approval is required for:

- Any use of CCTV footage for disciplinary purposes; and
- The release of CCTV footage to third parties, except for routine requests from Victoria Police or other lawful authorities.

4. PRIVACY, HUMAN RIGHTS, AND COMPLIANCE

4.1. Council will balance public safety objectives with individual privacy rights.

4.2. CCTV operations must comply with:

- Privacy and Data Protection Act 2014 (Vic)
- Surveillance Devices Act 1999 (Vic)
- OVIC – Guiding Principles for Surveillance
- Public Records Act 1973 (Vic)

- Freedom of Information Act 1982 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)

As well as the following Council Official documents

- Model Councillor Code of Conduct
- Staff Code of Conduct
- Workplace Resolution Policy and Procedure
- Social Media Guidelines
- Complaint Handling Policy
- Public Transparency Policy
- Community Engagement Policy
- Privacy Policy

- 4.3. Human rights impacts will be considered prior to the introduction of any new CCTV system.
- 4.4. Only authorised staff and approved third parties, such as Council appointed contractors or Victoria Police, may use CCTV systems, and all must complete relevant training for passive or active monitoring. Access approvals must be requested, approved, and documented through the relevant forms and workflows. *See the CCTV Procedure for further details.*
- 4.5. Complaints relating to the use of CCTV will be managed in accordance with Council's Complaints Handling Policy and all relevant legislation and regulations.
- 4.6. Misuse of CCTV systems or footage may result in disciplinary action and/or legal consequences.
- 4.7. Privacy breaches will be managed in accordance with Council's Privacy and Data Protection procedures.

5. ROLES, RESPONSIBILITIES, AND OVERSIGHT

- 5.1. The CEO oversees the Council's CCTV program and is ultimately responsible for its operations and use.
- 5.2. ELT approves new CCTV installations and ensures appropriate budgeting and resources are in place to manage Council's CCTV systems in line with this Policy and the related Procedure.
- 5.3. The Manager of Business Systems and Transformation oversees the Council's CCTV network and systems, with Business Systems and Transformation team members responsible for installing and maintaining CCTV equipment, conducting internal audits, testing security, system administration and access controls and ensuring staff are appropriately trained.

- 5.4. Staff with approved access to CCTV systems must use them in accordance with this Policy and the CCTV Procedure. They are required to report suspected misuse or faults to the Business Systems and Transformation team or their Direct Supervisor.

IMPLEMENTATION

This Policy will be made available to staff and Councillors on Council's intranet.

CHARTER OF HUMAN RIGHTS COMPLIANCE

It is considered that this policy is compatible with the relevant human rights identified in the *Charter of Human Rights and Responsibilities Act 2006 (Vic)*.

GENDER EQUALITY COMPLIANCE

It is considered that this policy is compatible with the relevant gender equality principles identified in the *Gender Equality Act 2020*.

Is a Gender Impact Assessment required?

☐ Yes

☒ No

REVIEW

This Policy must be reviewed a minimum of every four years or in-line with legislative change.

AUTHORISED

Adopted at 11 August 2026 Council Meeting.

END