



CCTV Surveillance Standard

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1 Introduction / Background

Closed Circuit Television (CCTV) brings benefits to the University of Wollongong (“UOW”) campus community through a variety of initiatives including the following:

- Acts as a deterrent to crime.
- Provides a potential opportunity to aid in the investigation and follow up of criminal activities.
- Enhances UOW Security’s capacity to increase surveillance of a larger area.
- Enhances the perception of safety.
- Aids in surveillance of traffic and parking activities.
- Helps to protect infrastructure and assets.
- Provides opportunity for surveillance of emergencies in particular events.

The Campus Watch Safety Camera Program (“the Program”) applies to all UOW’s Campuses and any properties or facilities operated by UOW, whether they are using centralised Dvtel operating platform or any other operating software or technology.

Over 500 cameras are installed at UOW Campuses in a variety of locations including within buildings, car parks, campus entry points, bus terminuses, open campus spaces and public pedestrian routes. These locations are determined on the basis of personal safety, building security, asset protection and user requests from Faculties and Units and security advice from internal and external sources including the NSW Police Force and other intelligence. They may include but are not limited to potential areas of risk including ATMs and banking institutions, bus stops, taxi ranks, car parks, retail shopping outlets, places frequented by staff and students, visitors and monitoring of traffic and emergency considerations.

CCTV is designed not only to aid UOW Security in its mission, but can be of assistance to:

- The Parking Attendant’s monitoring parking activity, assets and equipment.
- Faculties and Units for monitoring space for ethical reasons, protecting or supervising computer laboratories and other important space.
- Faculties and Units for managing compliance with UOW policies.
- Providing UOW Security with a professional environment for working with the NSW Police in providing a safer environment, reduce crime levels by deterring potential offenders and aid crime detection and apprehension of offenders.

The Standard contains the principles in accordance with which the Program will be operated. It will be supplemented by Operating Guidelines giving direction on various aspects of the day to day operations of the Program. The Standard has been developed to manage the CCTV resource in a responsible, ethical manner which will ensure that privacy of the campus community and the public is respected. This Standard should be seen as a code of practice for operators of the system to ensure that appropriate agreements and professional standards are enshrined in its use with Law Enforcement Agencies and will address concerns of staff with regard to the *Workplace Surveillance Act 2005* (NSW) (“the Act”). The Act defines surveillance as any surveillance of employees including camera surveillance and requires that employees be formally notified of any actions of UOW that would fall within the definition of surveillance. UOW is committed to meeting its statutory obligations under the *Workplace Surveillance Act 2005* (NSW). This Standard together with the [IT Acceptable Use Policy](#) represents formal notification to employees about the activities of UOW that fall within the statutory definition of surveillance.

2 Definitions

CCTV	Closed Circuit Television
SOC	Security Operations Centre
ATM	Automated Teller Machine
Overt	Open monitoring – no covert concealed cameras
EED	Employment Equity and Diversity

3 Scope / Purpose

3.1 Operating Principles

AS 4806.1 2006 sets out the following operating principles which establish a standard for the operators and those agencies interacting with the Program which form the basis of the Standard.

Principle 1

The Program will be operated fairly, within applicable law, and only for the purposes for which it is established or which are subsequently agreed in accordance with this Standard.

Principle 2

The Program will be operated with due regard to the privacy and civil liberties of individual members of the campus community and the public.

Principle 3

The campus community and public interest in the operation of the Program will be recognised by ensuring the security and integrity of operational Guidelines.

Principle 4

UOW Security has the primary responsibility for compliance with the objectives of the Program and the protection of the interests of the campus community and the public.

Principle 5

UOW Security will be accountable for the effective operation and management of the Program to the Director, Facilities Management Division.

Principle 6

The NSW Police Force are critical in the prevention of crime in and about Wollongong Campus and satellite Campuses and Centres. UOW Security will liaise with the NSW Police Force in accordance with the Standard and its operating Guidelines.

Principle 7

Contact related to the Program between UOW staff, any delegated contractors and the NSW Police, will be conducted in accordance with the Standard.

Principle 8

The campus community will be provided with clear and accessible information in relation to the operation of the Program.

Principle 9

Evaluation of the Program will be undertaken to identify whether the purposes of the Program are being complied with.

Principle 10

UOW staff or contractors employed to work in the Security Operations Centre (SOC) or using workstations outside of the Centre, whether they be operators or managers, will meet and apply the highest standards of probity and integrity. Access to Workstations outside the Operations Centre will be controlled through a hierarchy of access.

Principle 11

Access to the SOC will be restricted to licensed UOW Security staff and contract staff and authorised staff of the University. The SOC will be protected from unauthorised access.

Principle 12

Information recorded will not exceed that necessary to fulfil the purposes of the Program.

Principle 13

Information will be obtained fairly and in accordance with the privacy provisions enshrined in this Standard.

Principle 14

The retention of, and access to, photographs and recorded material will be only for the purposes provided by this Standard and will be kept no longer than is necessary for the purposes of the Program. Recorded material no longer required will be properly disposed of using approved methods.

The principles outlined above have been incorporated where appropriate in the following sections.

3.2 Changes to the Standard

- a) Major changes to this Standard require the approval of the Chief Administrative Officer (CAO).
- b) Any major change to this Standard will be developed in consultation with UOW Security, Security Supervisors (Systems) and (Operations), Manager Security or Director, Facilities Management Division. The NSW Police Force may be consulted for the purposes of ensuring the operation of the Standard does not impede prosecution of any criminal act.
- c) A major change is one that will have a significant impact on the operation of the Program, for example, a change to the purposes of the Program and/or the key principles.
- d) Any minor changes to the Program or to the Standard's Guidelines may be made by the Manager Security. A minor change is such as may be required for the purposes of minor adjustment of day-to-day operations of the Program, or clarification of the Program or the Standard. For example, the change to the wording of a particular section where its meaning might otherwise be viewed as ambiguous.

3.3 Purpose

- a) The objectives of the Program are to:
 - i. Provide a safe and secure environment.
 - ii. Enhance Campus Watch safety and crime awareness program.
 - iii. Assist in deterring potential offenders.
 - iv. Monitor movement, congregation and behaviour to better manage safety and risk on campus.
 - v. Assist UOW Security in determining the appropriate allocation of resources in situations where the commission of a crime is imminent or is in progress.
 - vi. Assist UOW Security and NSW Police Force in identifying offenders.
 - vii. Assist in the detection and prosecution of offenders.
 - viii. Assist in investigating academic misconduct and academic grievances.
 - ix. Assist in investigating incidents in and around campus.
- b) The primary purpose of UOW's Camera Program is to assist in the prevention of crimes against the person or property, and in the prevention of other criminal offences, including but not limited to:

- i. Personal safety.
 - ii. Asset and building protection.
 - iii. Trespass.
 - iv. Identifying offenders for stealing.
 - v. Malicious damage.
 - vi. Break, enter and steal.
 - vii. Monitoring traffic and parking.
 - viii. Monitoring emergencies.
- c) The Program may also be used by UOW for University purposes including but not limited to:
- i. Academic misconduct.
 - ii. Academic grievances.
 - iii. Occupational health and safety.
 - iv. Investigating incidents in and around campus.
- d) The Program may also utilise Intelligent Surveillance and/or Behaviour Analysis software for uses of including, but not limited to:
- i. Intrusion Detection.
 - ii. Detection and/or tracking of objects in uncrowded scenes.
 - iii. Vehicle traffic counting and traffic management.
 - iv. Crowd control management.
 - v. Slip and fall detection.
 - vi. Detection of suspicious behaviour.
 - vii. Vehicle recognition.
 - viii. Non-motion detection.
- e) The NSW Police Force may be provided access to use the Program during emergency situations such as a siege, riotous behaviour, bomb blast or controlled police operations on campus or in surrounding streets such as Northfields Avenue.
- f) The Program must be used in an overt operation at all times. To support this notices are erected in entrances to the campus and repeated throughout the campus. UOW Security may use the program for monitoring and intelligence gathering and investigation and may seek assistance from the NSW Police Force in addressing criminal conduct or other actions that may lead to or involve a breach of the peace.
- g) Cameras may be used to randomly monitor individuals, groups or locations when the operator believes it necessary to observe or monitor activity for events or potential criminal conduct or because an offence either has been committed, is being committed, may be committed or is about to be committed in the area being monitored.
- h) The Standard emphasises UOW's commitment to ensuring the privacy of individuals is protected, ensuring cameras are used for their designated purpose, and the protection of the rights of individuals.
- i) Operators of the CCTV system are accountable under this Standard through the Security Industry Act 2005 and its Regulations, the *Workplace Surveillance Act (2005) NSW* and the *Privacy and Personal Information Act 1988 (NSW)* for their use of the CCTV.
- j) Cameras are placed on the property of UOW to enhance the Program's operational efficiency and effectiveness.

4 Owner of the Program and Accountability

- a) UOW Security has the primary responsibility for compliance with the objectives of the Program and the protection of the interests of the campus community and public.
- b) UOW Security will be accountable for the effective operation and management of the Program to the Director, Facilities Management Division.
- c) UOW Security will be responsible for the introduction and implementation of the Standard and for ensuring compliance with the principles contained within.
- d) UOW Security will provide information to the CAO about the operation of the Program and about any proposed changes to the Standard.
- e) UOW Security will operate the system. Unless there is an advantage in using a law enforcement agency, it may give authority to the NSW Police Force to operate the system in an emergency or critical incident.
- f) The UOW Senior Executive, the Director, Facilities Management Division and the Manager Security all have the right of inspection of the Program's facilities, procedural documentation, files, registers, records and live and recorded material associated with the Program to ensure the Program is being properly controlled and operated.

5 NSW Police

- a) The NSW Police Force is critical in the prevention of crime in and about UOW Campuses and Centres. UOW Security will liaise with the NSW Police Force in accordance with the Standard and its Guidelines.
- b) Contact related to the Program between UOW staff, any delegated contractors and the NSW Police, will be conducted in accordance with the Standard.
- c) Any involvement in the Program by the NSW Police Force will be in accordance with this Standard.
- d) UOW Security will ensure that when it is interacting with the NSW Police Force that compliance with the Standard is adhered to.
- e) UOW Security will ensure that only in an emergency or a critical incident will Police be given temporary control of the Program.
- f) The Local Area Commander may be asked to participate in the evaluation of that part of the Program that the NSW Police Force participates in.

6 Public Information

- a) The UOW campus community will be provided with clear and accessible information in relation to the operation of the Program.
- b) Signs that CCTV cameras are operating are displayed at the perimeter of the area covered by the system and at other key points as determined by the Manager Security.
- c) These signs will:
 - i. Inform the community that cameras are in operation.
 - ii. Inform the community that footage is recorded at all times.
 - iii. Identify UOW as the owner of the Program.
- d) Copies of the Standard will be made available to the UOW campus community through UOW's website.

- e) Inquiries in relation to the Program and its operation can be made in writing to:

Director Facilities Management Division
University of Wollongong
Wollongong NSW 2522

7 Evaluation of the Program

- a) Evaluation of the Program will be undertaken to identify whether the purposes of the Program are being complied with.
- b) UOW is responsible for ensuring that the Program is evaluated to ensure that the Program is meeting its aims and objectives and promotes community confidence in the Program.
- c) UOW will undertake an evaluation of the Program every three years, to be conducted by a reference group, facilitated by the Manager Security.
- d) The reference group referred to above will include, but is not limited to:
- i. Assistant Director, Facilities Management Division.
 - ii. Manager Security.
 - iii. IMTS Director/Delegate.
 - iv. Representative, NSW Police Force Wollongong Area Command.
- e) The results of the evaluation will be provided to the CAO.
- f) The evaluation will provide a review and report on matters including:
- i. Description of the system.
 - ii. Purpose and objectives of the Program.
 - iii. Changes if any to the extent of the system.
 - iv. Any significant changes to the Standard.
 - v. Any deviations from the Guidelines.
 - vi. SOC records and registers.
 - vii. Number and nature of any complaints.
 - viii. Requests for copies of recorded material or photographs.
 - ix. Locations where additional cameras may be required.
 - x. Assessment of its impact upon crime where directly evident.
 - xi. Assistance given to NSW Police for detection of incidents and/or offenders.
 - xii. Assessment of system and camera requests.

8 Management of the Security Operations Centre (SOC)

- a) UOW Staff or contractors employed to work in the SOC or using workstations outside of the Centre, whether they be operators or managers, will meet and apply the highest standards of probity and integrity. Access to Workstations outside the SOC will be controlled through a hierarchy of access.
- b) Access to the SOC will be restricted to licensed UOW Security staff and authorised contract staff and authorised staff of UOW. The SOC will be protected from unauthorised access controlled by the Manager Security.
- c) A set of Guidelines for UOW staff, UOW Security staff, authorised contract staff and any staff or contractors working within the SOC are in place to ensure that access to the SOC is restricted to approved operating staff and from unauthorised access at all times.

- d) The circumstances in which visitors or members of the campus community are able to access the SOC will be controlled in accordance with the Guidelines. All such access shall be recorded in a register, including the identity of accompanying persons.
- e) UOW and/or an approved security provider/contractor will adopt:
 - i. A requirement that staff must have and maintain at all times all necessary licensing requirements and be qualified at a suitable level to meet UOW standards and all relevant legislative and regulatory requirements.
 - ii. Procedures which make it plain to staff that they risk disciplinary proceedings (including dismissal) if they breach any of the provisions of the Standard.
 - iii. A requirement of confidentiality which is enforceable during and after termination of employment.
 - iv. Supervision that ensures compliance with the Standard.
- f) Any Faculty or Unit who receives external or internal inquiries for visitations to the Program will direct these inquiries to the Manager Security in all circumstances. Visitations will be supervised by the Manager Security or his/her delegate.
- g) The Licensee of the Unibar must comply with the licence conditions imposed by the *Liquor Act 2007* (NSW). This requires that the Licensee be able to access the CCTV cameras installed in and around the licensed premises of the Unibar at all times. The Manager Security has authorised the Licensee of the Unibar to access the recordings of CCTV cameras around the licensed premises of the Unibar. This includes the right to provide access to an authorised officer of the Office of Liquor Gaming and Racing and/or a NSW Police Officer to view and if requested, release footage to the extent necessary to comply with the law.

9 Control and Operations of Cameras

- a) Information recorded will not exceed that necessary to fulfil the purposes of the Program.
- b) Information will be obtained fairly and in accordance with the privacy provisions enshrined in this Standard.
- c) Cameras may be housed indoors in overt dome housings and outdoors in weather protective overt domes or housings which will be clearly apparent to the community and public.
- d) Cameras will not be used to look onto adjacent or nearby premises, buildings, commercial premises or private residences, unless requested by the NSW Police Force for the purpose of:
 - i. following participants in a crime;
 - ii. following participants suspected of being involved in a crime;
 - iii. monitoring persons or motor vehicles suspected of being involved in a crime; and
 - iv. monitoring property suspected of being used to accommodate criminal activity; or
 - v. there is a clear benefit to the University community in its protection.
- e) Cameras will be operated in accordance with the Standard at all times, unless other than when used by a Police Officer via an authorised warrant or through approved access by the NSW Police Force in special operational circumstances, through authorised police regulations or an authorised warrant.
- f) Operators of camera equipment will act in accordance with the highest standards of probity and integrity and will control cameras to record subjects or particular places strictly in accordance with the purposes of the Program, this Standard and applicable legislative requirements.
- g) Only trained and authorised staff with the responsibility for using the equipment will have access to operating controls, except in the case of an emergency whereby the NSW Police Force may have access.

10 Access to Recorded Material and Photographs

- a) The retention of, and access to, photographs and recorded material ("Data") will be only for the purposes provided by this Standard and will be kept no longer than is necessary for the purposes of the Program. Data no longer required will be disposed of using approved methods.
- b) A request to access Data must be made directly to the UOW Manager Security. In considering a request to access Data the UOW Security Manager will have regard to the following:
 - i. the position of the person requesting access; and
 - ii. the purpose for which access is requested.
- c) For the purpose of considering a request under clause 10(b), UOW will prima facie, allow Data to be viewed by persons in the following positions:
 - i. The NSW Police Force.
 - ii. A Statutory Authority with power to prosecute (e.g. ASIC, ICAC).
 - iii. Barristers, Lawyers and Solicitors appointed by the University or its insurers.
 - iv. UOW staff investigating alleged breaches of UOW Policy.
- d) For the purpose of considering a request under clause 10(b), UOW will prima facie provide access to view Data for the following purposes:
 - i. By UOW Security staff and approved contract security staff investigating any event, a criminal offence or suspected criminal offence.
 - ii. By UOW staff for University purposes.
 - iii. For use in UOW Security intelligence gathering.
 - iv. In compliance with the needs of the NSW Police in the investigation and detection of a crime or suspected crime.
 - v. For use in the NSW Police intelligence gathering.
 - vi. For providing evidence in criminal and/or civil proceedings.
 - vii. For identification of witnesses.
- e) Any request that falls outside the scope of clause 10(c) and 10(d), including without limitation, any request to obtain a copy of the Data must be made to the UOW Manager Security who will consider the request and where appropriate consult with the UOW Information Compliance Officer. In determining a request to provide access and/or a copy of the Data UOW will have regard to the following:
 - i. the proposed use of the Data;
 - ii. privacy obligations; and
 - iii. resource implications.
- f) Refer to reference material '[Access to CCTV Recorded Material and Photographs](#)'.
- g) UOW has the discretion on whether to provide access and/or a copy of the requested Data. In addition, UOW reserves the right to charge for related costs and attach relevant conditions of use.
- h) Subject to any conditions imposed by UOW in accordance with clause 10(g), Data must:
 - i. be treated according to all relevant or appropriate legislation and standards so as to provide continuity of evidence and to avoid contamination of evidence;
 - ii. not be sold or used for commercial purposes or the provision of entertainment and will only be used for the purposes as contained in the Standard; and

- iii. only be shown to the community/or public in accordance with the needs of UOW Security and/or the NSW Police in connection with the investigation of crime or in any other circumstances provided by law.
- i) Subject to the concurrence or request of the NSW Police, the CAO, through the UOW's Manager Security and the UOW's Public Affairs Unit, may approve release of Data to the media.
- j) Use of Data by the media should only occur to gain community/public information with respect to the identity of a person/s wanted. The recognisable characteristics of other people in the footage shall be obscured.
- k) Any Data released to the media should be accompanied by a signed release document from UOW's Public Affairs Unit, which clearly states what the Data will be used for and sets out the limits on its use.
- l) Appropriate security measures will be taken against unauthorised access to, alteration, disclosure, accidental loss or destruction of Data in accordance with the *Security Industry Amendments Act 2005* and its regulations and the State Records Act.
- h) Notwithstanding the above, the Licensee of the Unibar must comply with the licence conditions imposed by the *Liquor Act 2007* (NSW). This requires that the Licensee be able to access the CCTV cameras installed in and around the licensed premises of the Unibar at all times. The Manager Security has authorised the Licensee of the Unibar to access the Data recorded on CCTV cameras around the licensed premises of the Unibar. This includes the right to provide access to an authorised officer of the Office of Liquor Gaming and Racing and/or a NSW Police Officer to view and if requested, release Data to the extent necessary to comply with the law. The Licensee of the Unibar must inform the Manager Security if any access is provided in accordance with this section.
- m) All images are recorded and retained on IT servers for a minimum of 15-30 days unless they are required in relation to the investigation of crime or for court proceedings.
- n) All images may be recorded and retained for a period less than outlined in 10(m), during times of upgrading, repair or changeover of IT and camera software or hardware, or during periods of maintenance or replacement of equipment or assets.
- o) To safeguard the integrity of the footage, all live footage is recorded through UOW's central IT network. The only footage recorded at the SOC will be material archived or saved for evidentiary purposes for ongoing investigations and subsequent prosecution.
- p) UOW retains ownership of and has copyright in all recordings, photographs and documentation pertaining to the Program.

11 Compliance and Breaches of the Code

Prime responsibility for ensuring the Standard is adhered to rests with UOW. This responsibility includes ensuring that breaches of the Standard are investigated and remedied to the extent that breaches of the Standard are within UOW's power to remedy.

12 Complaints

- a) UOW has internal procedures for the management of complaints or grievances that are available to staff and students. Staff and students should use these procedures should they wish to lodge a complaint.
- b) Members of the public may lodge a complaint to the Director Facilities Management Division for investigation and response.
- c) Alternatively a complainant may contact a UOW Privacy Officer via the University's website <http://www.uow.edu.au/about/privacy/>

d) The *Privacy and Personal Information Protection Act 1998* (NSW) authorises Privacy NSW to receive and investigate complaints about alleged violations of privacy. Any member of the public is entitled to lodge a complaint with Privacy NSW. UOW will cooperate with the investigation of any complaint by Privacy NSW.

e) Complaints in relation to any aspect of the management or operation of the system may be made in writing to:

Director, Facilities Management Division
 University of Wollongong
 Wollongong NSW 2522

This Standard has been approved by the CAO.

13 Related Documents

- NSW Government's Policy Statement and Guidelines for the Establishment and Implementation of Closed Circuit Television in Public Places.
- The AS 4806.1 2006.
- *Government Information Public Access Act 2009* (NSW)
- *Workplace Surveillance Act 2005* (NSW).
- *Security Industry Amendments Act 2005* (NSW).
- *Privacy and Personal Information Protection Act 1998* (NSW).
- *State Records Act 1998* (NSW).
- Code of Practice – Wollongong City Council.
- Reference Document: Access to CCTV Recorded Material ([FMD-SEC-REF-023](#))

14 Version Control Table

Version Control	Date Released	Author/Reviewer	Approved By	Amendment
1	090323		David Anderson, Manager Security	New standard
2	110329		David Anderson, Manager Security	Standard was reviewed per Section 7 3/11/10 by prescribed participants. New forms were created B&G-SEC-FRM-043 and B&G-SEC-FRM-045. B&G-SEC-GUI-006 Security Operations Centre and CCTV System Guidelines were updated to recognise the new forms. There have not been any changes to this Standard.
3	120118			Document updated to reflect name change from Buildings & Grounds (B&G) to Facilities Management Division (FMD).
4	120312		David Anderson, Manager Security	Review of standard by UOW Legal Unit to manage a variety of occurrences where requests for data from civil parties outside of UOW may occur and access by appropriate and authorised UOW Staff. Added clauses to navigate UniCentre's Licensee with regard to cameras operating on Licensed premises.
5	150422	David Anderson, Manager Security	David Anderson, Manager Security	Reviewed and changed old titles VPA to CAO.