

POLICY GC15 - CCTV AND SURVEILLANCE

Responsible Officer: Chief Executive Officer

Approved By: Council

Adoption Date: 26 March 2026

Last Reviewed:

Version: 2

Next Review Date: March 2029

1. Purpose

The Shire is committed to providing a safe environment for employees and the community, while protecting its assets and property.

Surveillance devices, including CCTV and tracking technologies, may be deployed to:

- Improve safety and amenity within Shire premises and public spaces.
- Support investigations and legal proceedings.
- Deter unlawful, antisocial, or inappropriate behaviour.

The Shire operates surveillance in accordance with relevant legislation, including the *Surveillance Devices Act 1998 (WA)*, and respects individual privacy rights.

2. Scope

This policy applies to all employees, contractors, volunteers, and visitors (collectively employees) while:

- On Shire premises.
- Engaged in Shire-related activities.
- Using Shire vehicles or equipment fitted with tracking devices.

It applies to:

- Fixed and mobile CCTV cameras.
- GPS or tracking devices in vehicles or equipment.
- Future surveillance technologies deployed by the Shire.

3. Definitions

Term	Definition
CCTV	Closed-Circuit Television system used to monitor and record activity in Shire-owned or controlled areas.
Surveillance Device	Any optical, audio, or tracking technology used for monitoring purposes, including cameras and GPS tracking.
Authorised Officer	Employee approved by the CEO to operate or access CCTV or surveillance systems.
GPS/Tracking Device	Technology used to monitor location and movement of Shire vehicles or equipment.
Employee	All Shire employees, contractors, volunteers, and visitors engaged in Shire activities.
Tracking	The electronic monitoring of the location and movement of Shire vehicles, equipment or assets using GPS or similar technology for approved operational, safety, compliance, and asset management purposes.

4. Policy Statement

- Surveillance is limited to safety, asset protection, and crime prevention purposes.
- CCTV and tracking devices will not be installed in areas with a reasonable expectation of privacy (e.g., bathrooms, change rooms, residences).
- Surveillance data may be retained if required for investigations or legal proceedings.
- Only CEO-authorized personnel may operate or access surveillance systems.
- Employees will be notified of surveillance through signage and/or communication.
- Confidentiality of all data is strictly maintained.
- Misuse or breaches may result in disciplinary action, up to and including termination.

5. Roles and Responsibilities

Role	Responsibility
Council	Approve policy and any major operational changes; ensure compliance with legislative requirements.
CEO	Oversee surveillance systems; approve authorised officers; ensure compliance and reporting.
Executive Managers	Implement policy within directorate; manage authorised officer access; monitor compliance.
Authorised Officers	Operate CCTV and surveillance systems in accordance with policy, Code of Conduct, and SOPs; maintain confidentiality.
Employees	Comply with policy; report any misuse or breaches.

6. Procedures / Implementation

6.1 CCTV Operation

- CCTV cameras may be installed in public areas, Shire buildings, works depots, community facilities, and other identified high-risk locations as approved by the CEO.
- Installation locations must be determined following a documented risk assessment and must not capture areas where there is a reasonable expectation of privacy, including bathrooms, change rooms, or private residences.
- Prominent signage must be displayed in all areas where CCTV is operational, advising that surveillance is in use.
- CCTV systems must be maintained in good working order. Regular system testing and maintenance checks are to be documented.
- Recorded footage must be stored securely with appropriate access controls to prevent unauthorised access, alteration, disclosure, or deletion.
- Footage may be retained if required for an investigation, legal proceeding, insurance matter, or formal request under legislation.
- All recordings constitute official records of the Shire and must be managed in accordance with the *State Records Act 2000 (WA)* and the Shire's Recordkeeping Plan.

6.2 GPS/Tracking Devices

- GPS or tracking devices may be installed in Shire-owned vehicles, plant, and equipment for legitimate operational purposes including safety, fleet management, asset protection, resource allocation, and compliance monitoring.
- Employees allocated vehicles or equipment fitted with tracking devices will be notified in writing.
- Tracking devices will not be used for covert or unreasonable employee monitoring.
- Monitoring must be proportionate, lawful, and related to operational requirements.
- Access to tracking data is restricted to CEO-authorised personnel and may only occur for legitimate management, safety, compliance, or investigative purposes.
- Tracking data must be securely stored and managed as an official record in accordance with applicable legislation and the Shire's Recordkeeping Plan.
- Emergency Vehicles and Plant are exempt.

6.3 Data Access and Release

- Surveillance recordings and tracking data are confidential and classified as restricted information.
- Access is limited to Authorised Officers approved by the CEO and must be for a documented and lawful purpose.
- A Surveillance Access Register must be maintained recording:
 - Date of access
 - Name and position of person accessing data
 - Reason for access
 - Whether data was copied or released
 - Authorising officer
- Surveillance data may only be released:
 - To law enforcement agencies upon receipt of a formal written request, warrant, or lawful direction
 - In response to a valid application under the *Freedom of Information Act 1992 (WA)*
 - Where otherwise required or authorised by law
- Unauthorised access, disclosure, copying, or distribution of surveillance data constitutes serious misconduct and may result in disciplinary action and/or referral to external authorities.

7. Legislative and Other References

Local Government Act 1995

Local Government Amendment Act 2023

Local Government (Model Code of Conduct) Regulations 2021

Shire of Bridgetown–Greenbushes Code of Conduct

Surveillance Devices Act 1998 (WA)

8. Review and Monitoring

This Policy will be reviewed every three years, or earlier if:

- Legislative changes occur
- Governance requirements change

Monitoring of compliance is undertaken by the CEO.

Monitoring of compliance will be undertaken by the Chief Executive Officer.

9. Related Documents / Forms

Document / Form	Description / Purpose
Code of Conduct	Sets ethical standards for employees operating surveillance systems.
Disciplinary Policy	Outlines consequences of policy breaches.
CCTV Standard Operating Procedures	Operational procedures for authorised officers.