

Policy

Surveillance Camera Policy

Purpose

This policy governs Urban Utilities' use of both permanent and temporary surveillance cameras at its commercial and operational sites, as well as other locations where it undertakes business activities for safety, security, and enforcement purposes.

Applicability of the Policy

This is an operational policy, which is for internal and external use (and will be made available on our external website).

This policy commences from the date approved by the Chief Executive Officer.

Scope

This policy governs Urban Utilities' use and location of surveillance cameras and the subsequent recording, monitoring, storage, access and use of recorded material.

This policy applies to any person, whether an employee, contractor, service provider, member of the public or otherwise to the extent the person or an activity being undertaken by the person is captured by surveillance cameras when on or near a Urban Utilities site or location in which Urban Utilities is undertaking authorised activities.

For clarity, this policy does not cover camera inspections undertaken in order to assess the condition of assets where no person or personal information is identifiable.

Related Legislation

- *Criminal Code Act 1899* (Qld) and *Criminal Code*
- *Crime and Corruption Act 2001* (Qld)
- *Information Privacy Act 2009* (Qld)
- *Invasion of Privacy Act 1971* (Qld)
- *Planning Act 2016* (Qld)
- *Public Records Act 2002* (Qld)
- *Right to Information Act 2009* (Qld)
- *South East Queensland Water (Distribution and Retail Restructuring) Act 2009* (Qld)
- *Water Supply (Safety and Reliability) Act 2008* (Qld)
- *Work Health and Safety Act 2011* (Qld)

Policy Statement

Urban Utilities is committed to ensuring the safety and security of its employees, contractors, visitors and members of the public as well as the protection of its assets. Urban Utilities also recognises, however, that this must be balanced against an individual's right to a reasonable expectation of privacy and accordingly is committed to ensuring that any personal information it collects is dealt with in accordance with the Information Privacy Act 2009 (Qld) and the Information Privacy Principles.

Surveillance Camera Locations

Urban Utilities uses surveillance cameras on a permanent and temporary basis, in order to monitor and record activity in the following locations:

- Reception areas at its commercial premises;
- Resource Recovery Centres Water and Sewerage Network Asset sites;
- Depots;
- Reservoirs;
- Pumping Stations;
- Radio/Communication Huts;
- Telemetry Huts ;
- Tanker Filling Stations;
- Temporary sites when undertaking responsive maintenance activities (i.e. repairing a burst main) or planned project activities; and
- Urban Utilities stalls at community events

Urban Utilities will consider the privacy of individuals when determining the location of each camera installed, to prevent or minimise recordings of passers-by or another person's private property. Adequate signage will be placed at each camera location to alert individuals to the camera's operation.

Urban Utilities will maintain a register of all surveillance cameras and associated monitoring equipment together with its capabilities and camera locations.

Surveillance camera purposes and use

The purpose of Urban Utilities surveillance camera monitoring and recording is:

- to provide a safe and secure work environment for individuals on Urban Utilities premises or where-ever Urban Utilities may be undertaking business or community related activities;
- to deter unlawful property damage to Urban Utilities assets and to assist in identifying offenders;
- to deter unlawful, aggressive or harmful behaviour and to assist in identifying offenders;
- to manage operational network and asset performance; and
- to assist in identifying, addressing and enforcing third party compliance obligations under Urban Utilities Third Party Compliance Function.

Urban Utilities will ensure video monitoring of public areas for security purposes within, or adjacent to, Urban Utilities premises or temporarily occupied sites is limited to uses that do not violate the individual's reasonable expectation to privacy.

Should an incident occur, recordings may be provided as evidence to law enforcement agencies, such as the police, to assist with enquiries, investigations or prosecutions. Surveillance cameras and video footage is not used to monitor staff performance, however, they may be used to investigate allegations of misconduct by employees or contractors.

The security team is responsible for approving any alternative CCTV surveillance cameras, whether covert or overt to ensure they comply with policies and legal requirements. Appropriate CCTV surveillance signage must be displayed to inform individuals of surveillance in the area, to support privacy requirements and promote transparency.

The security team ensures that all surveillance system deployments are properly assessed and selected for their required purpose and meet the necessary standards.

Storage and security of recordings

Live viewing of surveillance footage may be undertaken by authorised employees for monitoring purposes, however, viewing of stored footage is by application only for both internal and external stakeholders.

Images recorded by surveillance cameras are securely stored and are only accessible by authorised employees. Where the recording is not required for an acceptable purpose, the digital files are stored for up to 60 days after which they are programmed to be automatically erased. Recordings used for acceptable purposes, including law enforcement, accidents, incidents and misconduct, will be retained for the period advised by the State Archivist. Controlled access to the secured footage is strictly maintained and a log of access is kept. Copies of recordings will not be made for other purposes unless they are relevant to the purpose of surveillance or are required by law. Any copies made are logged and stored in a securely lockable area until disposal.

Third party access to recordings

Recordings may be shown or released to a third party in the following circumstances:

- to the police or other law enforcement agencies in relation to criminal or unlawful acts;
- to a regulator (eg Workplace Health & Safety or Environmental), in relation to the investigation of an alleged regulatory offence;
- to an Urban Utilities Insurer;
- as required to enable or assist Urban Utilities in the performance of Third-Party Compliance function;
- as required in order for Urban Utilities to pursue, defend or otherwise participate in an action or proceeding before a court, tribunal, commission of enquiry or other dispute resolution body; or
- when otherwise allowed or required by law (i.e. pursuant to a court order).

Recordings may also be accessed by:

- data subjects (or authorised representatives) pursuant to an access request under the Information Privacy Act 2009 (Qld);
- individuals (or authorised representative) pursuant to an access request under the Right to Information Act 2009 (Qld) or a court order; or
- Urban Utilities management or legal representatives in relation to an alleged incident of serious misconduct by an Urban Utilities employee or contractor.

Security contractors/companies

Urban Utilities will ensure that any third party contractor or service provider who has access to, or control of, a security system or surveillance camera on behalf of Urban Utilities is bound by and subject to this policy (or such other policy that provides at least the same or better protections), and relevant laws and regulations relating to the protection of personal information and data.

Privacy impact assessments

Prior to the installation or relocation of a new or temporary surveillance camera or system, Urban Utilities will undertake a privacy impact assessment to ensure privacy compliance and identify better practice.

Definitions

Personal information	is information or an opinion, including or information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, as defined in the Information Privacy Act 2009 (Qld).
Surveillance camera	includes any equipment, fixed or temporary, used to observe and record images of individuals, such as closed-circuit television (CCTV), temporary or fixed cameras, body-worn video and drones.
Third party compliance function	means Urban Utilities' role in identifying, addressing and enforcing compliance obligations that apply to third parties (excluding Urban Utilities employees or contractors) under key legislation regulating Urban Utilities water and wastewater business, in circumstances where the third party's non-compliance with their obligations impact on Urban Utilities.

Related Documents

Internal Documents

- POL88 Urban Utilities Protective Security Policy
- FOR283 Urban Utilities Application for Release of Information
- POL62 Urban Utilities Asset Management Policy
- GP54 Urban Utilities Code of Conduct
- POL74 Urban Utilities Complaints Management Policy
- POL59 Urban Utilities ICT Acceptable Use Policy
- POL54 Urban Utilities ICT Security Policy
- POL29 Urban Utilities Information Privacy Policy
- POL56 Urban Utilities Risk Management Policy
- PRO634 Urban Utilities Third Party Compliance Framework

Review Date

This policy will be reviewed every 2 years or in accordance with changes to relevant legislation or business objectives.

Authorising Officer

Chief Executive Officer
Urban Utilities