

ITEM 9 POLICY REVIEW - CCTV CODE OF PRACTICE COUNCIL POLICY

This report presents the scheduled review of Wollongong City Council's Closed-Circuit Television (CCTV) policies and procedures. Regular reviews ensure alignment with current legislation, technological advancements, and industry best practices.

RECOMMENDATION

Approve the revised CCTV Code of Practice Council Policy

REPORT AUTHORISATIONS

Report of: Ingrid McAlpin, Chief Digital + Information Officer
 Authorised by: Renee Campbell, Director Corporate Services - Connected + Engaged City

ATTACHMENTS

- 1 Biennial Evaluation of the Wollongong City Council CCTV Network
- 2 CCTV Code of Practice

ACRONYMS USED IN REPORT

Abbreviation	Meaning
CBD	Central Business District
CCTV	Closed-Circuit Television
LGA	Local Government Area

BACKGROUND

There are 482 operational CCTV cameras across multiple assets and locations in the Wollongong LGA. A register of these locations and the purpose of these cameras can be seen on the CCTV Register on Council's internet site. The majority of these cameras are installed within the Wollongong CBD, Mall and beaches / Blue Mile precincts.

On the 28 November 2022 Council adopted the current CCTV Code of Practice and Register to satisfy the requirements of NSW Government Policy Statement and Guidelines for Establishment and Implementation of Closed Circuit Television (CCTV) in Public Places.

It was noted that the use of CCTV in the LGA required an on-going means of evaluation. To satisfy this requirement a CCTV Evaluation Framework was developed as a mechanism for evaluating the on-going effectiveness of CCTV cameras in reducing crime and improving public safety in accordance with the established objectives.

These objectives include:

- Help secure a safer environment and protect the community and property from crime;
- Assist in reducing personal and property crime levels by deterring potential offenders;
- Assist Police in determining the appropriate allocation of resources in situations where the commission of a crime is imminent or in progress;
- Assist in the detection and prosecution of offenders; and
- Assist with crowd control for public events.

A comprehensive policy framework has been established to guide the operation and oversight of CCTV systems within the Local Government Area. This framework includes:

- CCTV Code of Practice
- CCTV Management Policy
- CCTV Standard Operating Procedure

These documents are subject to regular review to ensure continued relevance and effectiveness.

In accordance with Principle 9 of the Code of Practice, Council staff have conducted an evaluation of the existing CCTV network. The findings are documented in the Biennial Evaluation of the Wollongong City Council CCTV Network. No changes are required to the Council Policy as a result of the Evaluation, however minor updates are proposed as outlined in the Proposal section of this report.

It is important to note that CCTV is only one part of a range of crime prevention measures and not a standalone strategy. A Community Safety Interagency Group, made up of Council staff, NSW Police and other community groups oversee requests for new CCTV cameras and conduct Community Safety Audits to assist in improving the safety of public spaces.

PROPOSAL

The CCTV Code of Practice Council Policy has undergone review, with the following minor amendments made:

- Removal of outdated examples
- Minor grammatical corrections
- Elimination of the phrase “or relevant technology” to maintain consistency with the Code of Practice
- Adjustment of the CCTV system review cycle from every two years to every three years, aligning with the policy review schedule. Reviews can still be undertaken more frequently if required.

It is proposed that the reviewed and updated CCTV Code of Practice, as outlined in Attachment 2, be approved.

CONSULTATION AND COMMUNICATION

Consultations have occurred with relevant divisions of Council, including site managers of council facilities.

Feedback has been received from the community through an online community survey, business survey and face to face feedback, which informed the evaluation of the CCTV network. Consultation has also occurred with security contractors and the NSW Police.

The Community Safety Interagency Group reviewed the outcomes from the Evaluation of the CCTV Network.

Council’s website will be updated with the new Code of Practice.

PLANNING AND POLICY IMPACT

This report contributes to the delivery of Our Wollongong 2035 Goal 4 “We have a healthy, respectful, and inclusive community”. It specifically delivers on the following:

Community Strategic Plan 2035		Delivery Program 2025-2029	
Strategy		Service	
4.6	Work together, to reduce crime, and foster a safe, and resilient community.	Information Management and Technology	

FINANCIAL IMPLICATIONS

Council has allocated budget for the operation of the CCTV network.

CONCLUSION

The regular review and update of Council’s CCTV-related policies and procedures ensures compliance with current legislation, integration of technological advancements, and alignment with industry best practice.

BIENNIAL EVALUATION OF THE WCC CCTV NETWORK

INTRODUCTION

In keeping with the CCTV Policy and Code of Practice, Wollongong City Council's CCTV Network is to be evaluated biennially. The first of these evaluations was completed during the period November 2024 - January 2025.

The evaluation of the CCTV network is to assess whether the CCTV system is;

- ☐ Achieving its objectives (including an assessment of its impact upon crime and community safety, for those systems implemented for crime prevention or community safety purposes);
- ☐ Being used in accordance with its established objectives, and not for any other purpose;
- ☐ Impacting on other groups;
- ☐ Providing an overall benefit (after a consideration of the costs involved in operating the system); and
- ☐ Requires changes to the extent or location of the cameras, or technology used.

Council owns and operates 482 CCTV cameras across multiple assets and locations in the Wollongong LGA. The majority of these cameras are within the Wollongong CBD, Mall and beaches / Blue Mile precincts. The locations and the purpose of the CCTV cameras in the LGA can be found on this [map](#).

The purpose of CCTV installations may be manyfold; from the protection of assets to crowd control and to assisting in reducing the public's fear of crime. The CCTV Evaluation framework which was adopted by Council in November 2022, was developed to determine those metrics which would indicate that the CCTV system is achieving its stated aims.

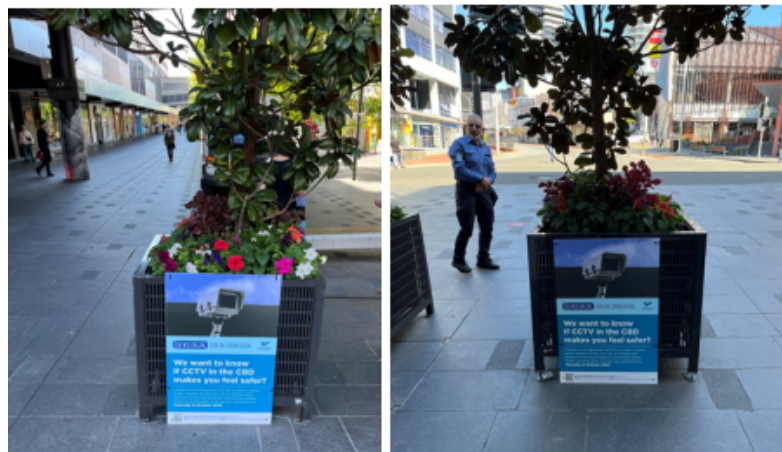
As per the framework, the following metrics were evaluated;

1. Public Awareness of the CCTV Network.
2. Whether CCTV is installed in active crime areas.
3. Adequate coverage by the CCTV cameras.
4. Quality and security of stored data.
5. CCTV Footage requests from NSW Police are being responded to within 72 hours.
6. Community perception of safety in areas covered by CCTV.
7. Whether CCTV is meeting its purpose for installation.

METHODOLOGY

During the period 17 October to 31 October 2024, Council invited the community and businesses operating in Wollongong to join the conversation about CCTV in the Wollongong CBD, seeking their feedback on safety.

A project webpage was published on our.wollongong.nsw.gov.au, which included an online community survey, a business survey, FAQs, copies of the CCTV Code of Practice,



Memorandum of Understanding with the Police and the Community Safety Plan 2021-2025.

Corflute signs were also installed in high traffic areas in Wollongong Mall. These signs had a QR code linked to the project webpage. Emails were sent to the 1191 people on the Register of Interest – Safety, with a link to the project page. The Register of Interest – Safety, is a list of people who had registered their contact details on the engagement management platform ‘Engagement HQ’ indicating they were interested in projects or information about safety.

Council staff conducted intercept surveys (the surveys) in the Wollongong Mall during Eat Street (Thursday evening community food stalls) and Friday Market (daytime ‘general’ community stalls) events. Wollongong Youth Centre sought feedback on CCTV from young people who attended the facility.

A Council produced ‘City Centre’ Newsletter with a link to the specific business survey on the project page was sent to 153 businesses operating in the Wollongong Mall.

Council heard from 124 community members via online surveys (108), intercept surveys (13) and emails (3). The Youth Centre received anecdotal feedback that suggested young people were aware of the CCTV cameras in the Wollongong CBD. Three businesses completed the online business survey.

For the sake of completeness, the following were also consulted as part of the evaluation:

- Controllers of Premises – these are the site managers inside of council and as such as the service managers for the provision of CCTV. The controllers of premises set the required service levels required for CCV.
- Security Team – Wollongong CBD. The contract security guards, who provide guarding services to the CBD and Mall.
- NSW Police – Wollongong
- H3C Plus – The CCTV integrator and maintenance provider under contract to Wollongong City Council.

EVALUATION

1. Public Awareness of the CCTV Network

Two thirds of the community who provided their feedback were aware of the CCTV cameras in the Wollongong CBD. All locations where there is CCTV have clear signage indicating such and the CCTV register, on the Wollongong City Council website is an up-to-date listing of CCTV locations.

Two thirds of people who completed the survey said they feel safer in the CBD because of the presence of CCTV cameras. The remaining third were either not aware, or unsure of the existence of the CCTV. The survey recipients were equally divided in relation to the appropriateness of the deployment of CCTV, with just over half of people saying that CCTV was either not appropriate or they were unsure. The remaining half stating that they did believe that the presence and operation of CCTV was appropriate. Some respondents commented that the CBD would benefit from a physical police presence. There was also a consensus that were there more people visiting the Mall it would also feel safer.

2. CCTV Installation in Active Crime Areas

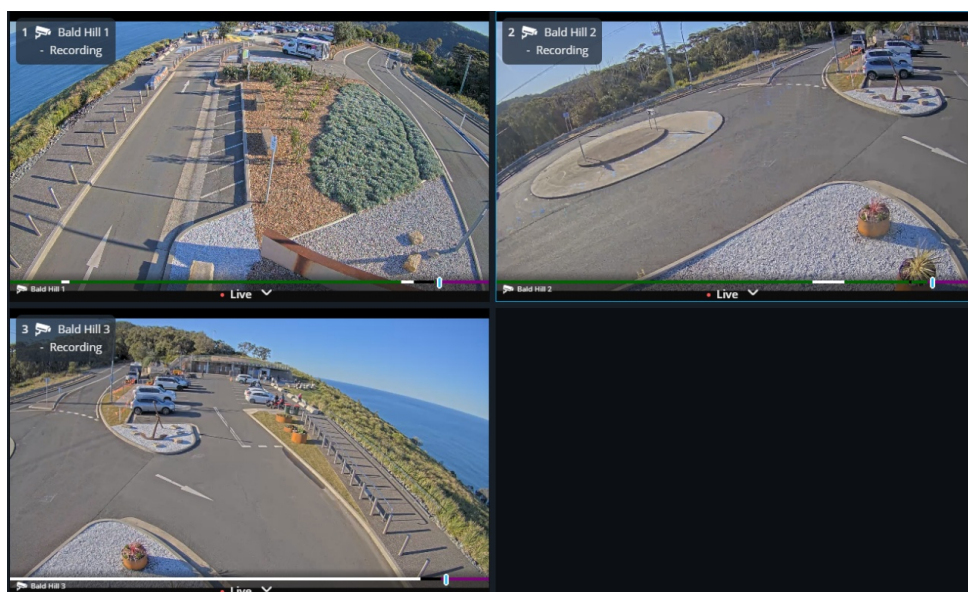
All locations where CCTV is installed is approved and reviewed by the Community Safety Interagency Group (made up of representatives from NSW Police, council, community and business groups). As per the table below NSW Police, also routinely request council's CCTV footage.

CCTV Footage Requests - NSW Police

CATEGORY OF INCIDENT	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	TOTAL
Assault / Affray	7	8	4	5	2	4	2	4	3	4	4	8	55
Break & Enter	0	0	0	1	2	1	0	1	0	2	1	0	8
Drugs	0	0	0	3	0	0	0	0	0	0	0	0	3
Fraud	0	0	0	0	1	3	0	1	0	0	1	0	6
Licencing	1	1	0	0	0	0	0	0	1	0	0	0	3
Malicious Damage & Graffiti	0	0	3	3	1	2	3	2	1	1	1	1	18
Miscellaneous	1	1	4	6	10	12	7	6	6	6	5	6	70
Offensive Behaviour	0	0	0	0	1	0	0	1	2	1	0	2	7
Other -Stealing	1	1	3	4	2	1	5	1	2	4	1	1	26
Retail Stealing	3	4	3	4	1	4	3	5	2	2	1	0	32
Robbery	0	0	0	3	1	0	0	0	0	3	0	1	8
Slips, Trips, Falls	0	0	0	1	2	0	0	0	0	0	0	1	4
Vehicles	5	5	1	1	2	3	0	1	1	2	0	0	21
Harassment	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTALS	18	20	18	31	25	30	20	22	18	25	14		241

Moreover, in response to ongoing vandalism and antisocial behaviour at Bald Hill, additional CCTV cameras were installed. Please see image below. Since the installation there have been no further instances of vandalism or antisocial behaviour reported.

The surveys also indicated that there was a general understanding that CCTV was used in the community as a tool for gathering evidence in the event of a crime.



3. Adequate coverage of the CCTV camera network.

Over the past 24 months, council has actively been upgrading the CCTV network in line with the CCTV Strategy. An ongoing asset maintenance and replacement program has also been put in place. Of note the CCTV in the CBD, Whytes Gully and South Depot have been recently upgraded with contemporary systems. There are still some locations, such as the tourist parks, where upgrades to the CCTV infrastructure is required to ensure adequate coverage and satisfactory image clarity.

4. Quality and security of Stored Data

While some people surveyed were concerned about the privacy of recorded data, it should be noted that all data is securely stored. There are strict protocols for sighting and sharing recorded CCTV data as outlined by the CCTV Management Policy and overseen by the Manager Customer and Business Integrity. Data integrity and privacy is maintained with controlled and restricted access to

CCTV footage, and automated deletion of data that is not required occurs no later than 30 days from the recording date.

5. CCTV Footage requests from NSW Police are being responded to within 72 hours.

CCTV footage requests from NSW Police represent the majority use of footage recorded by WCC as demonstrated below over the 2024 calendar year. All CCTV requests from NSW Police were addressed and responded to within a 72-hour period. All of these requests are filed in WCC's Document Management system ECM, here.

6. Community perception of safety in areas covered by CCTV.

Community surveys results showed that two-thirds of those surveyed knew there was CCTV in the Wollongong CBD and it made them feel safer. Just over half said they thought CCTV was an appropriate tool for community safety.

7. Whether CCTV is meeting its purpose for installation

All council owned and operated CCTV is meeting its purpose for installation and is only being used in accordance with the established objectives.

From the 241 requests for Council collected CCTV in 2024, it could be assumed that the CCTV network assists NSW Police in the investigation and/or prosecution of civil and criminal offences in relation to the security of public places and Council's facilities/assets, or crimes against the person. Similarly, the survey responses indicate that the majority of responders agree that the presence of CCTV in the CBD is improving public confidence in the safety and security of public places and the distinct drop in vandalism and antisocial behaviour following the CCTV installation at Bald Hill is a testament to the power of CCTV to mitigate the risk of such behaviour in high risk public places.

CONCLUSION

The existing CCTV network has proven to be effective in the provision of CCTV footage and coverage within areas of concern. Data integrity and privacy is maintained with controlled and restricted access to CCTV footage, and automated deletion of data that is not required occurs no later than 30 days from the recording date. There is a maintenance plan and schedule in place to ensure WCC can maximize the lifecycle of these assets. Assets are being replaced / upgraded as required to ensure we retain a robust and reliable service to the community.

In essence the governance and management of the CCTV network continues to be aligned to community expectations.

APPENDICES

1. CCTV Network Evaluation Report [Doc ID 26133965]
2. CCTV Code of Practice Policy [Doc ID 26147593]
3. CCTV Management Policy [Doc ID 26344047]
4. CCTV Standard Operating Procedure [Doc ID 23607197]



CCTV CODE OF PRACTICE COUNCIL POLICY

ADOPTED BY COUNCIL: [TO BE COMPLETED BY GOVERNANCE]

PURPOSE

This Code of Practice (policy) outlines the principles that council staff will consider when determining the establishment, operation and management of CCTV in public places.

POLICY INTENT

The main objectives of this policy are to:

1. Help secure a safer environment and protect the community and property from crime
2. Assist in reducing personal and property crime levels by deterring potential offenders
3. Assist Police in determining the appropriate allocation of resources in situations where the commission of a crime is imminent or in progress
4. Assist in the detection and prosecution of offenders and
5. Assist with crowd control for public events.

WOLLONGONG 2035 OBJECTIVES

This policy aligns to Goal 4 of our Community Strategic Plan, "We have a healthy, respectful and inclusive community" and in particular the objective 4.6 "Work together to reduce crime, and foster a safe and resilient community".

POLICY

Closed Circuit Television (CCTV) has increasingly featured in the community as a safety and crime prevention tool. CCTV can be effective in improving perceptions of safety, deterring antisocial and criminal behaviour, protecting assets and assisting in prosecution.

This CCTV Code of Practice (policy) is to be applied to the management of the CCTV system used across the entirety of the Wollongong Local Government Area (LGA). The CCTV system consists of cameras, monitors, control panels, intelligent video software, video recording systems and supporting infrastructure.

Wollongong City Council's CCTV system is part of a layered security response that Council utilises with an aim to reduce crime. Other strategies include activating public space, appropriate lighting, natural surveillance, access control and signage.

Temporary CCTV cameras differ from Council's other CCTV cameras only in that they can be rapidly deployed to and from locations in order to prevent and reduce crime and anti-social behaviour in public space. Temporary CCTV cameras are included in Council's CCTV Program and are covered by Council's CCTV Code of Practice.

It is acknowledged that CCTV cameras installed in public place locations and as part of Council infrastructure may also capture Council staff performing work tasks. The CCTV Program, the subject of this Code of Practice, is not designed to intentionally provide workplace surveillance. Where the purpose is to provide workplace surveillance and/or a record of accidents or other non-crime incidents, Council's Surveillance of Employees Policy must be complied with.

This Code applies to CCTV established, operated or managed by, or on behalf of Council with Council's express consent.

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This Code does not apply to:

- a) any CCTV installed by a third party, such as a tenant or licensee of Council land and/or facilities
- b) mobile cameras including dash cams, safety cams (e.g. on community buses), web cams, drone footage and body worn video cameras that are primarily used for Council activities associated with enforcement by authorised officers of Council in their delegated tasks or for personal safety
- c) Cameras capturing still images for the purposes of regulatory compliance
- d) cameras attached to Council's garbage trucks for operational purposes
- e) where CCTV cameras are used for condition reporting of assets
- f) CCTV cameras operated for the purposes of Illegal Dumping Surveillance
- g) cameras used as smart sensors for the purpose of collecting data for business intelligence analytics e.g. for traffic flow monitoring or crowd density estimations etc.

Although CCTV systems installed by a community-based organisation who lease Council facilities are outside the scope of this Code, these systems will need approval from Council prior to installation. Council staff will consider how the proposed system aligns with the principles (below) prior to approving such a system. If approved, the system will be owned and operated by the organisation in accordance with appropriate legislation and guidelines.

Nothing in this policy authorises or permits in any way the use of facial recognition or any form of biometric technology. As a consequence, Council CCTV cannot incorporate or deploy such recognition or biometric technology.

KEY PRINCIPLES

Council staff will consider and determine the establishment, operation and management of CCTV in public places by Council, in accordance with applicable guiding principles as required, such as those outlined in the NSW Government CCTV Guidelines.

1. Council staff will ensure that where CCTV is established, operated and managed for crime prevention and community safety purposes, that the implementation of CCTV will be part of an integrated, multi-agency approach to crime control and community safety.

CCTV will only be considered as one part of a range of crime prevention measures, and not a stand-alone strategy, and prior to installation, a safety and security audit will be completed. The audit will consider:

- Whether the problem is on-going or the result of a one-off event
 - Whether the perception of crime is supported by evidence and data
 - How the establishment, operation and management of CCTV fits within a broader crime prevention strategy
 - Evidence as to the effectiveness of CCTV in addressing the identified crime
 - The lawfulness of the collection of personal information via CCTV, and
 - The costs associated with establishing, operating and managing the CCTV
2. Council staff will ensure that the ownership of a public area CCTV system is clear and publicly known.
 - Council staff will erect signs informing the public of the existence of CCTV in a public place and will ensure that the signs comply with relevant legislation such as the Privacy and Personal Information Protection Act 1998 (PPIP Act).

Furthermore, Council staff will maintain a public register of all Council CCTV systems and their locations.

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3. When considering establishing or significantly expanding a public area CCTV system, Council staff will ensure that the relevant concerns of all parties affected are considered through an effective consultation process. These could include:

- Residents
- Users of the public place
- Local businesses
- Police and other regulatory authorities, and
- Council staff when the regular place of work will be affected.

Information available through the consultation process will include the potential benefits of the system, possible costs involved, and privacy implications, including people's rights and Council's responsibilities. Consultation with Council staff will ensure compliance with the Workplace Surveillance Act 2005 and ensure that staff are given due notice prior to the installation of a system.

4. Council staff will identify the purpose and will develop and document objectives for the establishment, operation and management of CCTV in a public place. CCTV will only be used in accordance with its established objectives and not for any other purpose. Objectives may include:

- To assist in the investigation and/or prosecution of civil and criminal offences in relation to the security of public places and Council's facilities/assets, or crimes against the person
- Improving public confidence in the safety and security of public places
- To deter anti-social behaviours in high risk public places
- To assist with the safety of Council staff or authorised contractors within public places
- To assist with the management/operations or maintenance of public places, or monitoring their use or
- Identifying potential environmental or safety risks.

5. Where CCTV is established in a public place for crime prevention purposes, Council staff will consult with NSW Police to ensure that the installation of CCTV fits within a broader crime prevention strategy and will meet its objectives. NSW Police have viewing access to Council's CCTV facilities under an agreed Memorandum of Understanding.

6. Council staff will ensure that its CCTV systems are open and accountable and operate with due regard for privacy and civil rights of individuals and the community, including that:

- The recording and retention of images is undertaken lawfully
- The purpose for which the information is being obtained is known
- The information is not used for any purpose other than that stated
- People are made aware that they may be subject to CCTV surveillance, and
- The owners of the system are known and accountable for its operation

7. Council staff will develop and implement an evaluation framework for each public place where CCTV is established to determine whether the CCTV is achieving its objectives.

The evaluation framework will provide guidance on appropriate mechanisms to enable Council staff to assess whether the CCTV system is:

- Achieving its objectives (including an assessment of its impact upon crime and community safety, for those systems implemented for crime prevention or community safety purposes)
- Being used in accordance with its established objectives, and not for any other purpose
- Impacting on any groups

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- Providing an overall benefit (after consideration of the costs involved in operating the system), and
 - Requires changes to the extent or location of the cameras, or technology utilised.
8. Complaints in relation to Council's establishment, management or operation of CCTV may be made through Council's existing customer contact processes (in person at Council's Customer Service Centre, or via phone, letter or email).
- Complaints, except for those specified below, will be managed in accordance with Council's Customer Feedback and complaints Policy.
- Complaints in relation to Council's handling of a person's personal information may be made and will be managed in accordance with Council's Privacy Management Plan.
- Complaints in relation to Council's handling of a person's personal information may also be made to the NSW Information and Privacy Commissioner.
9. Council staff will review its CCTV systems every three (3) years to assess compliance with this Code and any associated management policies and standard operating procedures. The review will examine such matters as:
- Assessment of the system and any technological problems
 - Processes used to receive, access and process footage requests
 - Complaints received and responses provided
 - Compliance with relevant legislation, regulations and Australian Standards, and
 - Whether the systems and processes utilized remain good practice.

LEGISLATIVE REQUIREMENTS

The policy reflects, relevant laws and standards including

- *NSW Privacy and Personal Information Protection Act 1998*
- *NSW Privacy and Personal Information Protection Regulation 2019*
- *NSW Workplace Surveillance Act 2005*
- *Security Industry Act 1997* No. 157 (NSW)
- NSW Government policy statement and guidelines for the establishment and implementation of closed circuit television (CCTV) in public places Standards Australia (2006) Closed Circuit television (CCTV) Part 1 Management and operation (AS 4806.1 – 2006)
- Standards Australia (2006) Closed Circuit television (CCTV) Part 2 Application guidelines (AS 4806.2 – 2006)

REVIEW

This Policy will be reviewed a minimum of once every term of Council, or more frequently as required, if significant legislative changes occur, or upon any changes to the NSW Government CCTV Guidelines.

The review will consider the results of the audits of Council's CCTV systems, to ensure that this Code is effective and has been implemented appropriately.

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RELATED STRATEGIES, POLICIES AND PROCEDURES

CCTV Standard Operating Procedures

CCTV Management Policy

Privacy Management Plan

Customer Feedback and Complaints Management Policy

DEFINITIONS

Closed Circuit Television System (CCTV) - A private television system involving one or more cameras, used to transmit images to a specific limited number of monitors on the same network or circuit

Public Places - Land and/or facilities that are owned, operated, or in the care of Council and which are considered by Council to be freely accessible to members of the public. Such areas may be defined by relevant legislation. Examples of public places, for the purposes of this Code, include Council's Customer Service Centre, libraries, parks, playgrounds, community centres, sporting fields, swimming pools, streets, footpaths

APPROVAL AND REVIEW	
Responsible Division	Information Management and Technology
Date adopted by Council	[To be inserted by Corporate Governance]
Date/s of previous adoptions	28/11/2022, 10/12/2018 17/07/2017, 27/06/2016, 27/10/2011, 11/2006, 8/04/2013
Date of next review	[To be inserted by Corporate Governance]