

Policy Type

Council

Policy Purpose

The purpose of this Policy is to establish a consistent and transparent framework for the installation, management and use of surveillance systems, also known as Closed-Circuit Television (CCTV), within the City of Cockburn.

This Policy aims to support community safety, protect City assets, and enhance workplace health and safety by ensuring that surveillance systems are deployed, operated and governed in a lawful, proportionate and accountable manner.

Policy Statement

The City of Cockburn is committed to improving community safety and security through the installation of surveillance systems. Surveillance acts as a deterrent to anti-social and criminal behaviour. It also assists regulatory compliance and a means of capturing evidence to support investigations.

Surveillance systems may also be used to support workplace safety by monitoring work environments, identifying hazards, and assisting in the review of incidents involving staff, contractors, and visitors. Footage may be utilised to investigate workplace incidents, verify reported events, and inform corrective actions and continuous improvement initiatives. The use of surveillance systems for these purposes will be conducted in accordance with relevant workplace policies, privacy obligations, and legislative requirements including the Surveillance Devices Act 1998, Privacy and Responsible Information Sharing Act 2024, Freedom of Information Act 1994.

The reference to surveillance system or device in this policy includes any device capable of capturing and recording audio-visual data, as well as any supporting equipment including but not limited to: CCTV cameras, poles, wireless transmitters, body worn cameras, routers and servers, which are necessary to achieve the objective of the surveillance of a particular area.

Installation of Surveillance Systems

Surveillance installations will be undertaken to enhance community safety, protect City facilities and assets, and support authorised investigating agencies.

The installation of new surveillance systems will be guided by the following principles:

- Surveillance may be installed where recurrent anti-social or criminal behaviour has been identified, for regulatory compliance or as a proactive measure to minimise damage to City assets and facilities.

- Surveillance may be installed at City facilities and managed spaces to improve the safety and welfare of the community, staff, and visitors.
- Installations must comply with City of Cockburn security specifications and/or relevant industry standards.
- Surveillance systems may be permanent or temporary and may be installed on City or private land, subject to landowner consent.
- Surveillance systems will generally be signposted; however, in limited circumstances (e.g. covert surveillance for Local Law enforcement), signage may not be appropriate, and alternative notification measures will be considered where required.
- The use of replica or “dummy” cameras is not preferred but may be considered in specific circumstances.
- Surveillance systems may operate continuously or be event-activated.

Allocation and Deployment of Mobile Surveillance Resources

The City may utilise mobile surveillance assets, including trailer-mounted, temporary, or relocatable systems, to respond to emerging or changing risks across the community.

The allocation and distribution of mobile surveillance resources will be based on:

- Identified or reported anti-social behaviour, criminal activity, regulatory compliance or safety risks.
- Protection of City infrastructure, facilities, and assets.
- Community safety priorities and operational needs.
- Requests or intelligence from authorised officers, business units, or partner agencies.

Mobile surveillance deployments will be:

- Risk-based, proportionate, and time-limited where appropriate.
- Subject to periodic review to ensure continued relevance and effectiveness.
- Installed and operated in accordance with the same standards, legislative obligations, and governance requirements as fixed CCTV systems.

Use and Management of Surveillance Footage

The City manages surveillance footage to support community safety, regulatory compliance, and lawful investigations.

Surveillance within and around the workplace is to ensure the security of City systems and data, compliance with applicable laws and City policies, to safeguard community information, and to ensure that resources are used appropriately and efficiently.

Surveillance footage may be used for:

- Workplace safety monitoring and incident review.
- Investigation of employee misconduct, in accordance with internal policies and procedures.
- Enforcement of Local Laws and related regulatory investigations.

- Review and investigate incidents at City venues and facilities relating to the use of those venues and facilities.
- Supporting Western Australia Police and other authorised agencies in investigations, in accordance with Memorandums of Understanding, Deeds, or lawful orders.
- Evidence retention, incident analysis, and continuous improvement of safety measures.

The City may capture and retain images and data relating to vehicles, individuals, and other identifiable details for these purposes.

Access to, use, and release of surveillance footage will be:

- Strictly controlled in accordance with a Code of Practice or operational guidelines.
- Managed in compliance with all relevant State and Commonwealth legislation.
- Surveillance footage will generally be retained for a period of 31 days, after which it will be automatically overwritten or securely deleted. This is dependant on the site capability and arrangements.
- Where footage is identified as relevant to an investigation, incident, complaint, or legal matter, it may be retained for a longer period. In such cases, the footage will be securely stored and managed in accordance with applicable legislation, the City's record-keeping requirements, and operational procedures to ensure its integrity and availability for evidentiary purposes.

Surveillance Artificial Intelligence (AI) Usage

The City may utilise Artificial Intelligence (AI) capabilities within its surveillance systems to enhance operational efficiency, public safety outcomes, incident detection, and the management of surveillance data.

The use of AI-enabled surveillance technologies must:

- Comply with all applicable legislation relating to privacy, surveillance, records management, and information security.
- Be implemented only for lawful and authorised Council purposes.
- Support, but not replace, human decision-making and operational oversight.
- Be subject to appropriate governance, transparency, risk assessment, and accountability measures.
- Ensure that any AI-generated alerts, recommendations, or analysis are reviewed by authorised personnel before operational action is taken where practicable.
- Be proportionate to the intended purpose and minimise unnecessary collection, processing, or retention of personal information.

All AI technologies associated with surveillance systems must be deployed, managed, and monitored in accordance with the City's current Artificial Intelligence (AI) Policy and any associated procedures, standards, or governance frameworks. Where inconsistencies arise, the City's AI Policy will take precedence in relation to the use, management, and oversight of AI systems.

The City reserves the right to suspend, modify, or remove AI functionality where risks, compliance concerns, or operational issues are identified.

Supporting Arrangements

The City may enter into Memorandums of Understanding or Deeds with law enforcement agencies or other authorised bodies to facilitate the lawful sharing of surveillance data for investigative purposes.

The City adopts a holistic approach to community safety, including the application of Crime Prevention Through Environmental Design (CPTED) principles. Surveillance is implemented as a complementary measure where environmental design and other preventative controls alone are insufficient to address identified risks.

Strategic Link:	Community Safety and CCTV Strategy
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