



Closed Circuit Television (CCTV) Policy



Policy number	009	Version	1.0
Drafted by	Paul Anderson	Approved by Trust on	3 Dec 2025
Responsible person	Chairperson	Scheduled review date	3 Dec 2027



1. Principles

1.1 The following seven principles have been established by the Yackandandah Cemetery Trust to support its approach to governing the use of CCTV systems. These overarching principles align with the OVIC Guiding Principles for Surveillance, and help define the legitimate need for surveillance and privacy safeguards.

1. **Legality:** The Trust will ensure that Surveillance is lawful and subject to regular review.
2. **Legitimate Aim:** The Trust will ensure that Surveillance serves a clearly defined public safety or crime prevention purpose.
3. **Necessity:** The Trust will ensure that only footage necessary for the stated purpose will be collected, and will only conduct Surveillance when needed for a specified purpose.
4. **Proportionality:** The Trust will ensure that Surveillance is undertaken in the least intrusive method available.
5. **Privacy Safeguards:** The Trust will ensure that it considers how privacy will be protected and will place signage to alert people to the surveillance activity.
6. **Non-discrimination:** The Trust will ensure that Surveillance does not target individuals based on protected attributes, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.
7. **Complaints: The Trust will provide** accessible pathways for complaints and remedies to concerns relating to its Surveillance activities.



2. Purpose

- 2.1 This policy establishes a governance framework for the lawful, ethical, and effective use of CCTV systems by the Yackandandah Cemetery Trust to deter and detect criminal activity, enhance public safety, and protect new and historical cemetery assets. It ensures compliance with applicable legislation and aligns with best practice guidance from the Victorian Ombudsman, Victoria Police, and the Office of the Victorian Information Commissioner (OVIC).
- 2.2 This policy applies to all CCTV systems installed, operated, or managed by the Cemetery Trust in publicly accessible areas of cemetery grounds. It does not apply to temporary surveillance devices used by law enforcement or private contractors outside the Trust's control.

3. Definitions

- 3.1 This section contains terms that we have used throughout the document. These terms have a particular meanings set out below when used in this document. It is important to read these terms and understand their meaning as this will help understand the document.
- 3.2 **CCTV:** Closed Circuit Television system used for surveillance and recording of public areas.
- 3.3 **Public Space:** Any area within the cemetery grounds accessible to the public, including paths, entrances, memorial zones, and car parks. The public toilet is not considered a public space
- 3.4 **Trust:** The governing body responsible for the management of the Yackandandah Class B Cemetery.



3.5 **Personal Information:** Information about an identifiable individual, as defined under the Privacy and Data Protection Act 2014 (Vic).

3.6 **Surveillance Footage:** Recorded visual data captured by CCTV systems

4. Legislative and Policy Framework

4.1 This policy is guided by the following instruments:

- Privacy and Data Protection Act 2014 (Vic)
- Surveillance Devices Act 1999 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Public Records Act 1973 (Vic)
- Freedom of Information Act 1982 (Vic)
- Local Government Act 2020 (Vic)
- Australian Standards AS 4806 series
- Victorian Ombudsman's Guidelines for CCTV in Public Places
- Victoria Police Guide to Developing CCTV for Public Safety
- OVIC Guiding Principles for Surveillance

5. Governance and Oversight

5.1 The Trust will appoint a CCTV Governance Officer who will oversee the implementation and compliance of the Cemeteries CCTV system use.

5.2 The Trust shall maintain a CCTV Code of Practice (Annex A) and Standard Operating Procedures (Annex B). The Trust has also completed a Privacy Impact Assessment (Annex C).

6. Community Engagement

6.1 The Trust will display signage at the entrance to the Cemetery and in the Rotunda during any surveillance events.

6.2 Policy documents shall be made available on the Trust's website.



7. CCTV Operations

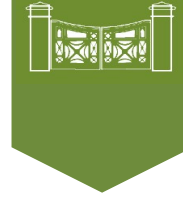
- 7.1 CCTV systems shall comply with AS 4806.1 and AS 4806.2 standards.
- 7.2 The Trust will ensure that cameras are positioned to monitor key public areas with demonstrated safety concerns, and that surveillance occurs only for a duration necessary.
- 7.3 Monitoring of footage shall be retrospective with Surveillance footage collected solely for crime prevention and public safety purposes. Disclosure of footage is permitted to:
- To Victoria Police for law enforcement purposes;
 - Under Freedom of Information requests; or
 - With individual consent or legal authority.

8. Data Security and Privacy Protection

- 8.1 The Trust will retain footage for a maximum retention period of 60 days unless otherwise required to retain longer to support investigations or legal proceedings.
- 8.2 The Trust will ensure that personal information is protected from misuse, loss, or unauthorised access, and will make footage available to individuals who request it and have a legal right under the Privacy and Data Protection Act or Freedom of Information Act.
- 8.3 The Trust will also manage data security and privacy in accordance with the Yackandandah Cemetery Trust Data Integrity and Security Policy, and Yackandandah Cemetery Trust Privacy Policy.

9. Complaints

- 9.1 Complaints may be lodged to the Trust secretary via email: cemetery.secretary@yackandandah.com. Individuals may also escalate complaints to the Victorian Ombudsman or OVIC.



9.2 Breaches of this policy shall be investigated promptly and reported to the Trust Committee.

10. Annexes

Annex A: CCTV Code of Practice

Annex B: Standard Operating Procedures

Annex C: Privacy Impact Assessment



CCTV Code of Practice

For the Use of Closed Circuit Television (CCTV) Systems at the Yackandandah Cemetery by the Cemetery Trust

1. Introduction

This Code of Practice outlines the principles and procedures governing the operation of CCTV systems at [Insert Cemetery Name]. It ensures that surveillance is conducted lawfully, ethically, and transparently, with respect for individual privacy and community expectations.

2. Objectives

The objectives of this Code are to:

- Deter and detect criminal activity, including vandalism, theft, and unauthorised access.
- Enhance the safety of visitors, staff, and cemetery assets.
- Ensure compliance with relevant legislation and privacy obligations.
- Promote public confidence in the responsible use of surveillance.

3. Scope

This Code applies to all CCTV systems installed and operated by the Cemetery Trust in publicly accessible areas of the cemetery. It covers the collection, use, disclosure, storage, and disposal of surveillance footage.

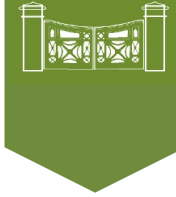
4. Legal and Ethical Framework

All surveillance activities must comply with:

- Privacy and Data Protection Act 2014 (Vic)
- Surveillance Devices Act 1999 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Public Records Act 1973 (Vic)
- Freedom of Information Act 1982 (Vic)
- OVIC Guiding Principles for Surveillance
- Victorian Ombudsman's Guidelines for CCTV in Public Places
- Victoria Police Guide to Developing CCTV for Public Safety

5. System Operation

- Cameras shall be installed only in areas with a demonstrated need for surveillance.
- Surveillance shall not be used to monitor private grieving or ceremonial activities.
- Signage must be clearly displayed at all monitored locations.



- Monitoring may be passive (record-only) or retrospective (review after incident).
- Live monitoring, if used, must be conducted by authorised personnel only.

6. Data Collection and Use

- Footage shall be collected solely for the purposes of crime prevention, public safety, and asset protection.
- Surveillance shall not be used for employee performance monitoring or personal profiling.
- Use of footage for secondary purposes requires documented approval and legal justification.

7. Access and Disclosure

- Access to footage is restricted to authorised Trust staff and contracted service providers.
- Disclosure is permitted only:
 - To Victoria Police for law enforcement
 - Under Freedom of Information requests
 - With individual consent or legal authority
- All disclosures must be logged, including date, recipient, and purpose.

8. Data Security and Retention

- Footage shall be stored securely with password protection and access logs.
- Minimum retention period: 60 days, or longer if required for investigation.
- Disposal shall be conducted in accordance with PROV Retention and Disposal Authorities.

9. Privacy and Human Rights

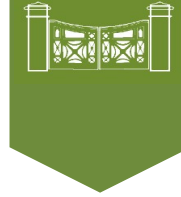
- Surveillance must be proportionate and respectful of individual privacy.
- Operators must complete privacy and human rights training.
- Surveillance must not discriminate based on race, gender, religion, or other protected attributes.

10. Complaints and Breach Management

- Complaints may be lodged via the Trust's complaints system.
- Breaches of this Code must be reported to the Governance Committee.
- Individuals may escalate complaints to OVIC or the Victorian Ombudsman.

11. Audit and Review

- The CCTV system and this Code shall be audited annually.
- Reviews shall assess compliance, effectiveness, and community impact.



- Findings shall be reported to the Trust and made available to the public.

12. Accountability

- The Cemetery Trust is responsible for ensuring compliance with this Code.
- All staff and contractors involved in CCTV operation must acknowledge and adhere to this Code.
- Non-compliance may result in disciplinary action or termination of contract.

13. Publication

This Code of Practice shall be:

- Published on the Trust's website
- Available at the cemetery office
- Provided to all relevant staff and contractors

14. Review Cycle

This Code of Practice shall be reviewed every two years from initial trust approval.



CCTV Standard Operating Procedure (SOP)

Operation of Closed Circuit Television (CCTV) Systems by the Yackandandah Cemetery Trust

1. Purpose

To provide clear, consistent instructions for the lawful and effective operation of CCTV systems at Yackandandah Cemetery, ensuring compliance with the Cemetery Trust's CCTV Policy and Code of Practice.

2. Scope

This SOP applies to all Trust staff, contractors, and authorised personnel involved in the operation, monitoring, maintenance, and management of CCTV systems in public areas of the cemetery.

3. Responsibilities

Role	Responsibility
Chairperson	Overall accountability for CCTV compliance and oversight.
Deputy Chair	Day-to-day operation, monitoring, and incident response.
IT/Technical Support	Maintenance, data security, and system integrity.
Trustees	Audit, review, and policy alignment.

4. System Access

Access to recorded footage is restricted to authorised personnel within the Trust. Login credentials must be unique, confidential, and changed regularly. All access must be logged, including date, time, user, and purpose.

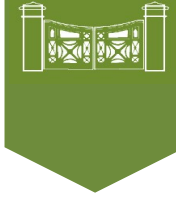
5. Monitoring Protocol

Monitoring shall be passive (record-only), no live monitoring is approved. Operators must not use cameras to zoom in on individuals or private activities. Surveillance must not be used for personal or non-authorised purposes.

6. Incident Response

When an incident is observed or reported, the Operator must:

1. Record the time, location, and nature of the incident.



2. Secure relevant footage and label it with incident details.
3. Notify the Chairperson.
4. If criminal activity is suspected, notify Victoria Police and provide footage as per disclosure protocols.

7. Footage Retention and Disposal

Footage shall be retained for a maximum of 31 days, and no less than 7. Footage related to incidents shall be retained until investigation is complete. Disposal shall be conducted securely and in accordance with PROV guidelines.

8. Disclosure Procedure

Disclosure of footage must follow these steps:

1. Verify legal authority or consent.
2. Log the disclosure with the Chairperson.
3. Provide footage securely (e.g. encrypted USB or secure file transfer).

9. Maintenance and Fault Reporting

Systems must be inspected every 6 months for functionality and image quality. Faults must be reported immediately to IT/Technical Support. Repairs must be documented and logged.

10. Training Requirements

All operators must complete training in:

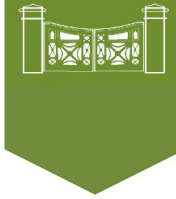
- Privacy and Data Protection Act
- Human rights obligations
- Technical operation of CCTV systems
- Incident and disclosure procedures

11. Breach Management

Any breach of this SOP must be reported to the Chairperson. Breaches shall be investigated and may result in disciplinary action. Serious breaches may be referred to OVIC or the Victorian Ombudsman.

12. Review Cycle

This SOP shall be reviewed every two years or earlier if required by operational changes or legislative updates.



Privacy Impact Assessment (PIA)

Use of CCTV for Crime Prevention Surveillance at the Yackandandah Cemetery

PART 1 – PROGRAM BACKGROUND AND DETAILS

1. Program Description

The Cemetery Trust proposes to install and operate CCTV systems in publicly accessible areas of the cemetery to deter and detect criminal activity, including vandalism, theft, and unauthorised access. The program supports public safety, asset protection, and community reassurance. It aligns with the Trust's statutory functions under the Cemeteries and Crematoria Act 2003 (Vic).

2. Scope of the PIA

This PIA covers the initial installation, ongoing operation, and management of CCTV systems. It includes data collection, use, disclosure, retention, and disposal. It does not cover private surveillance by third parties or temporary surveillance by law enforcement.

3. Legal Authority

- Cemeteries and Crematoria Act 2003 (Vic) – s.12 and s.13 (functions and powers of Class B Cemetery Trusts)
- Privacy and Data Protection Act 2014 (Vic) – compliance with Information Privacy Principles (IPPs)
- Surveillance Devices Act 1999 (Vic) – lawful use of optical surveillance devices
- Charter of Human Rights and Responsibilities Act 2006 (Vic) – proportionality and privacy rights

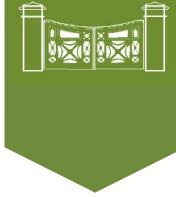
4. Stakeholder Consultation

- **Internal:** Trusees, groundskeepers, IT support
- **External:** Victoria Police, local historical society, cemetery visitors
- **Consultation methods:** signage, website notices, public feedback channels

5. Information Flow Diagram

A diagram should be attached showing:

- Camera locations
- Data capture points
- Storage systems



PART 2 – PRIVACY ANALYSIS

6. Information Elements

- Visual footage of individuals in public areas
- Time, date, and location metadata
- No audio or biometric data will be collected

7. Collection

- Passive recording only (no live monitoring)
- Signage clearly informs individuals of surveillance
- Collection is limited to areas with demonstrated safety concerns

8. Security

- Footage stored on encrypted servers with access controls
- Access restricted to authorised personnel
- Regular system audits and password updates

9. Use and Disclosure

- Used solely for crime prevention and investigation
- Disclosed only to Victoria Police, FOI applicants, or with legal authority
- All disclosures logged and reviewed

10. Management

- Operators trained in privacy and human rights obligations
- Governance Committee oversees compliance
- Breach reporting and incident management protocols in place

11. Disposal

- Maximum retention: 60 days
- Longer retention for incident-related footage
- Secure deletion in accordance with PROV standards

12. Other Considerations

- No facial recognition or profiling
- No monitoring of private ceremonies or grieving areas
- Community expectations and sensitivities considered



PART 3 – PRIVACY RISK ASSESSMENT

Risk Description	Likelihood	Impact	Rating	Mitigation	Residual Risk	Owner
Unauthorised access to footage	Medium	High	High	Access controls, audit logs	Low	Deputy Chair
Misuse of footage	Low	High	Medium	Staff training, SOP enforcement	Low	Trust Committee
Inadequate signage	Medium	Medium	Medium	Install clear signs at all entry points	Low	Grounds Supervisor
Over-surveillance	Low	Medium	Low	Limit coverage to essential areas	Low	Chairperson

PART 4 – ACTION ITEMS, ENDORSEMENT, DOCUMENT INFORMATION

18. Action Items

- Install signage and publish policy
- Conduct staff training

19. Endorsement

This PIA is endorsed by the Yackandandah Cemetery Committee on 4 Dec 2025.