

MEDIA RELEASE**18 June 2021****Management of Closed-Circuit Television Systems**

Auditor-General, Mr Michael Harris, today presented the report **Management of Closed-Circuit Television Systems** to the Speaker for tabling in the ACT Legislative Assembly. The audit considered the effectiveness of the management of CCTV systems by the Justice and Community Safety Directorate and Transport Canberra and City Services Directorate

The audit found that the Justice and Community Safety Directorate and the Transport Canberra and City Services Directorate have identified the purpose and objectives of their CCTV systems in various documentation, but this has been primarily done informally and inconsistently to date. Mr Harris says 'clarity around the purpose and objectives of the systems is important in facilitating ongoing review and accountability for system performance and reporting on the value and benefit of the systems to the ACT community and there is an opportunity for both directorates to more effectively review and report on the performance of their systems on an annual basis against clearly identified system purposes and objectives'.

Mr Harris also says 'the Justice and Community Services Directorate and the Transport Canberra and City Services Directorate have developed effective processes for the management of data captured through the CCTV systems considered as part of the audit. This includes practices for the secure storage of CCTV camera data and the release of CCTV camera data to stakeholders'. The audit found opportunities for improvement, including opportunities to improve the practices for storage of CCTV camera data on board buses.

The audit report made six recommendations for improvement. The recommendations are aimed at the Justice and Community Safety Directorate and the Transport Canberra and City Services Directorate, to annually review the effectiveness and ongoing need for the CCTV systems, provide clarity to the roles and responsibilities of those who are involved in the management and operation of the CCTV systems, and improve the staff training framework for those who are involved in the operation of the CCTV systems.

The summary of the **Management of Closed-Circuit Television Systems** audit, with audit conclusions, key findings and recommendations is attached to this media release.

Copies of **Management of Closed-Circuit Television Systems No. 05/2021** are available from the ACT Audit Office's website www.audit.act.gov.au. If you need assistance accessing the report please phone 6207 0833.

SUMMARY

At least 4,800 cameras are operated by ACT Government agencies in a variety of locations. CCTV cameras are operated as part of a CCTV system and multiple CCTV systems are operated by ACT Government agencies.

The audit considered the effectiveness of the management of CCTV systems by the Justice and Community Safety Directorate and Transport Canberra and City Services Directorate. The audit focused on the management of CCTV systems that are installed in the public safety network, on board Transport Canberra buses and at Libraries ACT sites

Conclusions

SYSTEM PURPOSE AND ACHIEVEMENTS

The Justice and Community Safety Directorate and the Transport Canberra and City Services Directorate have identified the purpose and objectives of their CCTV systems in various documentation; however this has been primarily done informally and inconsistently to date. Clarity around the purpose and objectives of the systems is important in facilitating ongoing review and accountability for system performance and reporting on the value and benefit of the systems to the ACT community. There is an opportunity for both directorates to more effectively review and report on the performance of their systems on an annual basis against clearly identified system purposes and objectives.

SYSTEM OPERATIONS

The Justice and Community Services Directorate and the Transport Canberra and City Services Directorate have developed effective processes for the management of data captured through the CCTV systems considered as part of the audit. This includes practices for the secure storage of CCTV camera data and the release of CCTV camera data to stakeholders. There are, however, opportunities for improvement, including specific opportunities to improve the storage of data captured through CCTV cameras on board buses.

Key findings

SYSTEM PURPOSE AND ACHIEVEMENTS	Paragraph
<p>The ACT Government Code of Practice for Closed Circuit Television Systems (2009) and Australian Standard AS 4806.1, Closed circuit television (CCTV) Part 1: Management and operation require the purpose and objectives of a CCTV system to be documented. The Strategic Closed Circuit Television (CCTV) Plan 2020-2022 provided information on the use of the system noting 'live and recorded footage from the CCTV Network is made available to specific users within the ACT Government and ACT Policing for the purpose of supporting public safety through asset security, business monitoring, event management, incident management and the investigation of crime'. The purpose and objectives of the public safety CCTV network were refreshed in April 2021 and are currently described on the public safety CCTV network webpage. The purpose is described as 'to enhance the safety and security of Canberra's public places, venues and events'. Supporting objectives are also described.</p>	2.18
<p>The purpose of the CCTV systems managed by the Transport Canberra and City Services Directorate are documented in the Directorate's December 2016 <i>Closed Circuit Television Guidelines</i>. The Guidelines have not been reviewed or updated since 2016. The Guidelines discuss the collective purpose of the Directorate's systems as: assisting in the protection of the public; providing a level of security for staff with direct contact with the public; improving security for the protection of agency and community assets and infrastructure; assisting in effective responses to security, safety and emergency incidents (to the public and staff); assisting in the investigation of possible offences; monitoring traffic flows and traffic operations; monitoring and managing services; and assisting with process control and business monitoring. The purpose of the CCTV systems, as documented in the <i>Closed Circuit Television Guidelines</i>, are broad and non-specific; they are a catch-all that cover all potential uses of the variety of CCTV systems managed by the Directorate. They do not provide specific and identifiable information on the purpose and objectives of the diverse systems maintained across the Directorate.</p>	2.19
<p>The <i>ACT Government Code of Practice for Closed Circuit Television Systems</i> (2009) requires ACT Government agencies to undertake a full assessment of the need before developing and implementing a CCTV system, including a requirement to identify the need for a CCTV system in the area where it is to be installed. In February 2020 the Justice and Community Safety Directorate and Transport Canberra and City Services Directorate developed a proposal for the expansion of the public safety CCTV network (through an additional 30 cameras in parts of the ACT without coverage) and the replacement of the CCTV cameras on board buses. For neither CCTV system did the proposal provide further information on: the nature, extent and cost of the problem that is seeking to be addressed; other initiatives that have been</p>	2.35

considered to address the problem; and the impact and benefit that the installation of the CCTV cameras would likely achieve. Nor did the proposal identify the specific needs to be addressed through the specific placement of the 30 additional public safety network cameras.

The *ACT Government Code of Practice for Closed Circuit Television Systems* (2009) requires ACT Government agencies to ‘undertake a full assessment of the need to install a CCTV system and detail the benefits of installing a CCTV system’ and prompts agencies to undertake a cost-benefit analysis. There is no evidence of any cost-benefit analyses being undertaken for any of the CCTV systems considered as part of this audit. The *Strategic Closed Circuit Television (CCTV) Plan 2020-2022* signals an intention to do this noting ‘the government will undertake a cost versus benefit assessment of the CCTV Network’ and that ‘this will help inform the government when considering future investment in the CCTV Network’. There is no further information available as to the scope or timing of this study. 2.45

The *Australian Standard 4806.1 – Closed Circuit Television (CCTV), Part 1: Management and operation* requires an annual report to be prepared on the achievements of the CCTV system in the previous 12 months. The annual report is to provide information on the operation and performance of the CCTV system including details of the system’s achievements during the previous 12 months and ‘an assessment of the CCTV system’s impact on crime levels and types of crime in the area covered by the system’. The Transport Canberra and City Services Directorate has not produced any reports for its systems considered as part of this audit. 2.64

The Justice and Community Safety Directorate published its inaugural annual report on the public safety CCTV network: *Annual Report for the ACT’s Public Safety CCTV Network for 2019-20*. The report provides information on: system utilisation data (including how many times CCTV data has been used for ACT Policing operations and the number of requests for data from ACT Policing and the public); system governance arrangements; changes to the system; and the outlook and future intentions for the system. While this is useful information, the report does not provide details of the system’s achievements, an assessment of the system’s impact on crime levels or an assessment of the usefulness of the footage, e.g. for the identification or arrest of suspects. 2.65

The Justice and Community Safety Directorate also provides six-monthly reports to the Security and Emergency Management Senior Officials Group (SEMSOG) on the use of the public safety CCTV network. The reports include, in part, information from ACT Policing on the number of ‘downloads’ from the public safety network and the number of occasions where ACT Policing resources have been despatched in response to incidents identified during monitoring. The report does not provide details of the system’s achievements, an assessment of the system’s impact on crime 2.66

levels or an assessment of the usefulness of the footage, e.g. for the identification or arrest of suspects.

The Australian Standard 4806.1 – Closed Circuit Television (CCTV), Part 1: Management and operation requires that an annual review of the CCTV system be undertaken and the ACT Government Code of Practice for Closed Circuit Television Systems (2009) discusses the need for ‘an independent audit of the CCTV system, against this Code and agency procedures, to be conducted on an annual basis’. The Justice and Community Safety Directorate and Transport Canberra and City Services Directorate do not conduct annual reviews or audits of the systems considered as part of the audit. 2.79

SYSTEM OPERATIONS

Paragraph

The *ACT Government Code of Practice for Closed Circuit Television Systems* (2009) clearly identifies that ACT Government agencies have primary responsibility and accountability for the management of CCTV systems within their agencies. The Code of Practice also identifies that the Security and Emergency Management Branch in the Justice and Community Safety Directorate has responsibility and accountability for ‘leadership in the development of policy for the use of CCTV technology across ACT Government, including the maintenance and review of this Code’. Cross-government governance and administrative arrangements are supported by the CCTV Working Group, which is designed to ‘[provide] a collaborative forum for developing, improving, and innovating CCTV installations and use in the ACT Government’. The CCTV Working Group provides an effective opportunity for cross-government communication and coordination. 3.10

The Transport Canberra and City Services Directorate’s December 2016 *Closed Circuit Television Guidelines* provide a useful guide to the management of CCTV across the whole directorate. The Guidelines specifically identify roles and responsibilities by position and title, which is intended to foster responsibility and accountability. However, the Guidelines, which were implemented in December 2016, have not been reviewed or updated since then and risk losing their value and currency. The Guidelines specifically identify roles and responsibilities for requirements and obligations established through the *ACT Government Code of Practice for Closed Circuit Television Systems* (2009). The extent to which these are met are discussed throughout this report. 3.19

A *Preliminary Memorandum of Understanding* has been agreed between Libraries ACT and the Security and Emergency Management Branch (Justice and Community Safety Directorate) for the provision of support for the repair, maintenance, operation and upgrade of the Libraries ACT CCTV system. The document is not dated, but the Audit Office was advised it was agreed in April 2019. The document discusses its purpose as a precursor to the development of a full Memorandum of 3.25

Understanding, but there is no indication of the timing of this development. The *Preliminary Memorandum of Understanding* does not align with aspects of the Transport Canberra and City Services Directorate's December 2016 *Closed Circuit Television Guidelines*, which identify specific and explicit responsibilities for Business Unit CCTV officers.

The *ACT Government Code of Practice for Closed Circuit Television Systems* (2009) 3.40 establishes requirements for the secure management of data captured through CCTV cameras including that 'agencies will establish procedures for the monitoring, retention, storage and destruction of recorded images'. No policies or procedures have been developed for the collection, recording and storage of data for any of the CCTV systems considered as part of this audit. Nevertheless, specific local practices have been developed to safeguard data capture through the CCTV systems. These practices differ according to the CCTV systems and their software and hardware characteristics. Notwithstanding the development of localised practices, the lack of policies and procedures increases the risk that individual, specific practices that have been developed are not consistently and rigorously followed.

The *Territory Records (Records Disposal Schedule – Security Coordination Approval 2009 (No 1))* 3.49 requires CCTV footage to be destroyed 30 days after being created. Specific local practices have been developed that seek to give effect to this requirement. For Transport Canberra buses, however, data captured through CCTV cameras on board buses is replaced by newer data when the hard disc on board the bus is full. In practice more or less than 30 days of data is maintained on the buses depending on the frequency with which the bus is used. The period for which data is stored on individual buses is unknown, as it is not planned for, or checked. To achieve the requirement of the *Territory Records (Records Disposal Schedule – Security Coordination Approval 2009 (No 1))* to destroy data after 30 days, the system is reliant on the combination of multiple unknown variables in the system, including how often the bus is used, for how long the bus is used and the integrity of the data. In being reliant on these variables, there is no certainty in achieving the requirement.

The *ACT Government Code of Practice for Closed Circuit Television Systems* (2009) 3.66 requires ACT Government agencies to develop procedures for the release of data to third parties that complies with relevant legislation, including privacy requirements. In practice, the Justice and Community Safety Directorate maintains records of data requests, the incident to which it relates and the action taken in response; these records distinguish between public requests and those from within ACT Government and also include the personal contact details of the requestor. In the calendar years 2018 and 2019, there were only four requests to the Justice and Community Safety Directorate for data captured on CCTV. Many more requests are received by Transport Canberra for CCTV footage captured by cameras on board buses. In the three years to 2019-20, 279 requests were received from ACT Policing and 190 requests were received from the public or other parties. Transport Canberra has

developed procedures for the management of requests from ACT Policing and other parties. Libraries ACT had six requests for CCTV data in the three years to 2019-20, from which data was released twice.

The *ACT Government Code of Practice for Closed Circuit Television Systems* (2009) requires that 'all staff involved in the operation of the CCTV system, are trained and competent in its operation and understand the operating procedures for the CCTV system'. The December 2016 *Closed Circuit Television Guidelines* for the Transport Canberra and City Services Directorate also requires 'all authorised officers using CCTV systems within the Directorate must receive training. This training is coordinated by the Business Unit CCTV Officer for the business area'. Training requirements are in place for Transport Officers in relation to the CCTV cameras on board buses. There are no formal training requirements or plans for other staff involved in any of the CCTV systems considered as part of the audit. In practice, training that may occur is achieved on an as needs basis by the incumbent operators via workplace handover.

3.86

Recommendations

RECOMMENDATION 1 CCTV SYSTEM PURPOSE AND OBJECTIVES

The Transport Canberra and City Services Directorate should identify and document the purpose and objectives of its specific CCTV systems.

RECOMMENDATION 2 ANNUAL REVIEWS OF CCTV SYSTEMS

The Justice and Community Safety Directorate and Transport Canberra and City Services Directorate should undertake an annual review or audit of their CCTV systems. The annual review or audit should consider:

- a) the effectiveness of the system in meeting its purpose and objective;
- b) the ongoing need for the system and the cameras included in the system; and
- c) the benefits of the continuing operation of the system against the costs associated with managing and maintaining the system.

RECOMMENDATION 3 SECURITY AND EMERGENCY MANAGEMENT BRANCH ROLES AND RESPONSIBILITIES

The Justice and Community Safety Directorate should document roles and responsibilities of Security and Emergency Management Branch staff involved in the management and operation of the public safety CCTV network in policy and procedural guidance.

RECOMMENDATION 4 TRANSPORT CANBERRA AND CITY SERVICES DIRECTORATE *CLOSED CIRCUIT TELEVISION GUIDELINES*

The Transport Canberra and City Services Directorate should review and update its *Closed Circuit Television Guidelines*. In doing so, the Directorate should ensure that roles and responsibilities for the management and operation of the directorate's CCTV systems are accurately documented.

RECOMMENDATION 5 DESTRUCTION OF CCTV CAMERA DATA ON BOARD BUSES

The Transport Canberra and City Services Directorate should develop a practice for the destruction of CCTV camera data on board buses 30 days after its capture.

RECOMMENDATION 6 STAFF TRAINING AND DEVELOPMENT

The Transport Canberra and City Services Directorate and Justice and Community Safety Directorate should formalise staff induction and training requirements for the management of CCTV systems. This should include the identification and documentation of formal training requirements through training plans and maintaining training records for all staff that are involved in the operation of CCTV systems.

Response from entities

In accordance with subsection 18(2) of the *Auditor-General Act 1996*, the Justice and Community Safety Directorate and the Transport Canberra and City Services Directorate were provided with:

a draft proposed report for comment. All comments were considered and required changes were reflected in the final proposed report; and

a final proposed report for further comment.

In accordance with subsection 18(3) of the *Auditor-General Act 1996* other entities considered to have a direct interest in the report were also provided with extracts of the draft proposed and final proposed reports for comment. All comments on the extracts of the draft proposed report were considered and required changes made in the final proposed report.

No comments were provided for inclusion in this Summary Chapter.