



**Office of the Information Commissioner**  
Queensland

# **Information Privacy and Camera Surveillance Survey 2015**

## **Department Sector Survey Report**

Queensland department sector responses and comparative analysis with  
2011 results

All data and information in this document are believed to be accurate and have come from sources believed to be reliable. Upon completion of the survey, consistency checks, data cleaning and editing were carried out. Where the resolution of an issue was not immediately apparent, agencies were contacted to clarify their responses. While this process resolved nearly all of the data issues, some minor issues were still not able to be resolved. Accordingly, the Office of the Information Commissioner cannot guarantee or represent that the data and information are accurate, up to date or complete, and disclaims liability for all claims, losses, damages or costs of whatever nature and however occurring or arising as a result of relying on the data and information, regardless of the form of action, whether in contract, tort (including negligence), breach of statutory duty or otherwise.

The OIC wishes to thank all responding agencies for their co-operation.



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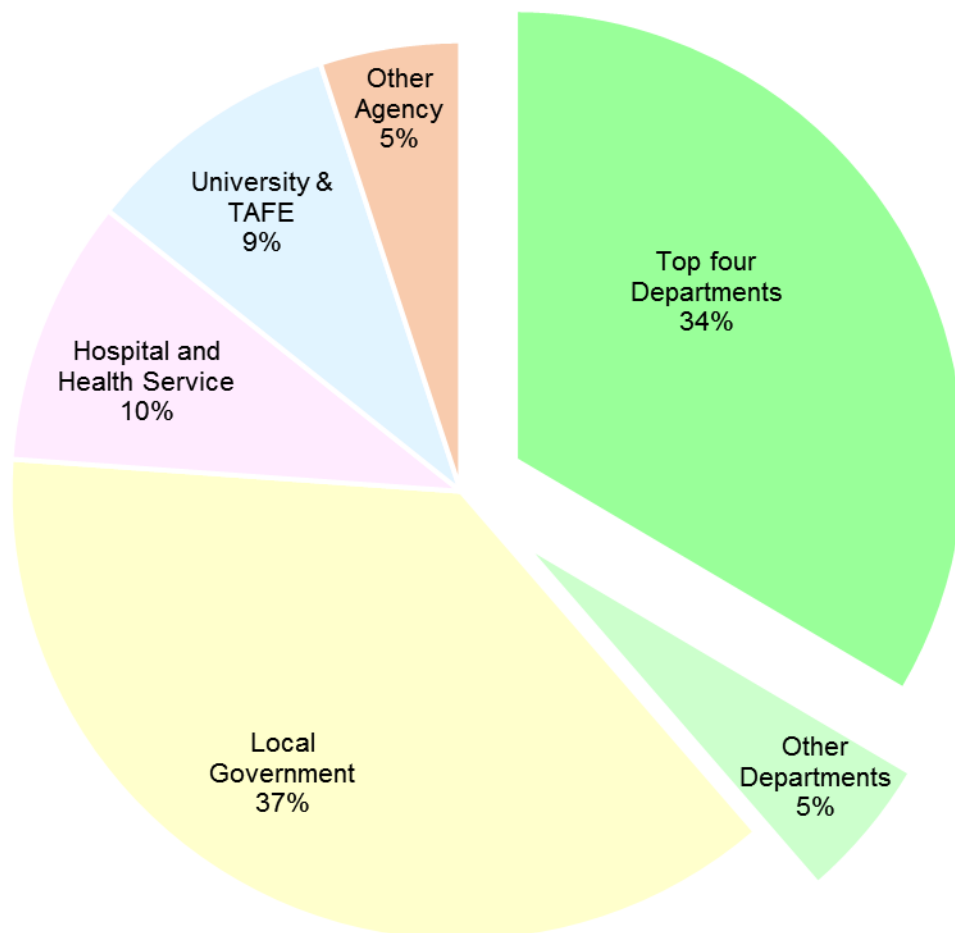
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# 1 Overview

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Over one third of the cameras operated by Queensland government agencies were operated by departments. Four of the five largest agency holdings of fixed surveillance cameras were departmental holdings. The top four departments were the Department of Education and Training, the Department of Transport and Main Roads, the Queensland Police Service and the Department of Justice and Attorney-General.

**Proportion of fixed surveillance cameras operated by sector and by top four departments**



**Chart D 1 Proportion of fixed surveillance cameras operated by departments of varying deployment size**

These four departments, which accounted for under a third of the number of departments with cameras, accounted for the majority of all fixed surveillance cameras (86.0%) operated by the sector. These four departments operated over 1,000 fixed surveillance cameras each. The five departments with the next largest deployments operated between 100 and 600 fixed surveillance cameras each, and operated one in ten fixed surveillance cameras in the sector. The five departments with the smallest deployments of fixed surveillance cameras operated

between 1 and 60 cameras each and accounted for only 1.2% of all fixed surveillance cameras operated by departments.

It was a common pattern across all agencies that agencies with larger holdings of cameras also had more documented policies and procedures, more systems for protection of data storage and security, and more structured procedures for use and disclosure of footage. Departments tended to outperform other agencies in these regards.

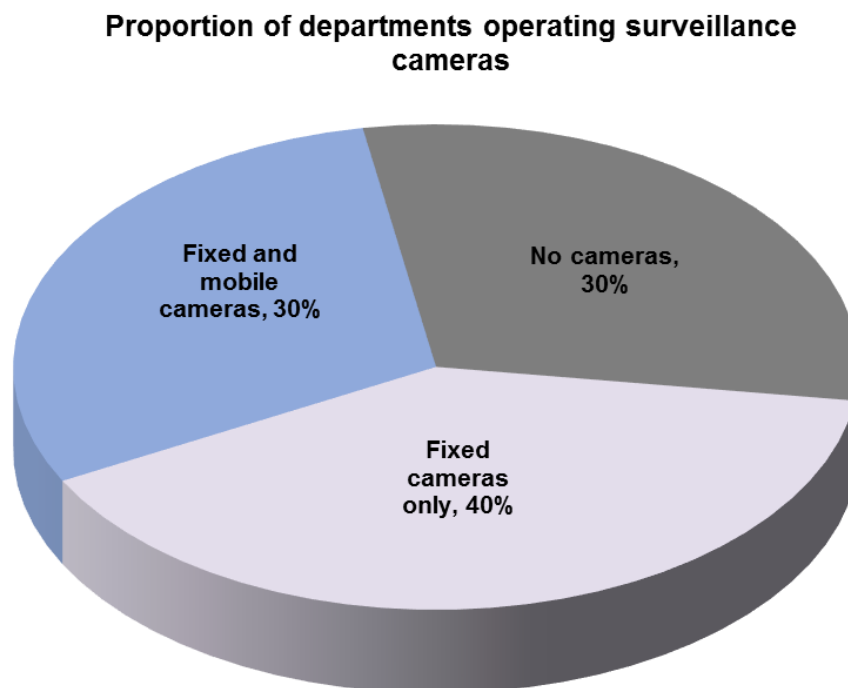
Departments performed less well than other agencies in informing the community about the camera surveillance, and in common with all agencies, departments could have made better use of their websites to provide information about camera surveillance.

Given that four departments accounted for over a third of government surveillance cameras, and the department sector had the second greatest reported disclosure of camera surveillance footage, improvements in departmental practices regarding adoption of the privacy principles would have a big impact for the community in ensuring the operation of camera surveillance respected and protected individual privacy.

## 2 Surveillance camera deployment

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All 20 Queensland departments responded to the survey in 2015. 70% of Queensland departments reported operating fixed surveillance cameras in 2015 (14 departments).



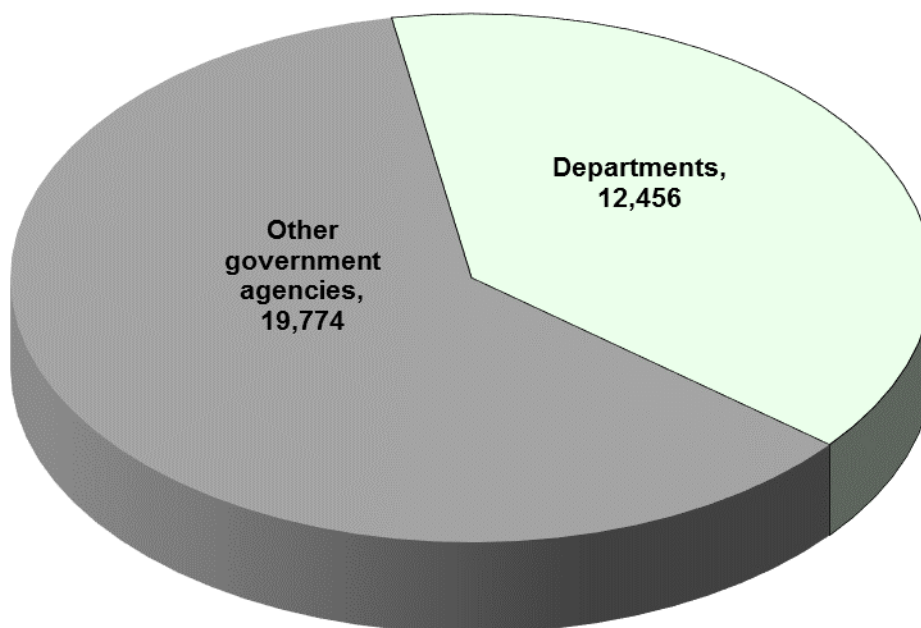
**Chart D 2 Proportion of departments which operated fixed and mobile surveillance cameras**

### 3 Number of cameras

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Queensland Government departments reported operating almost 12,500 fixed surveillance cameras in 2015, which was over a third of all fixed surveillance cameras operated by Queensland Government agencies in 2015.

**Proportion of all fixed surveillance cameras operated by departments**



**Chart D 3 Proportion of all fixed surveillance cameras operated by departments**

The number of cameras operated by the departmental sector in 2015 had increased by 14% from 2011-12.<sup>1</sup>

Departments were more likely than other government agencies to operate larger fixed surveillance camera deployments (nine departments operated more than 100 cameras and departments operated almost 900 cameras on average each).

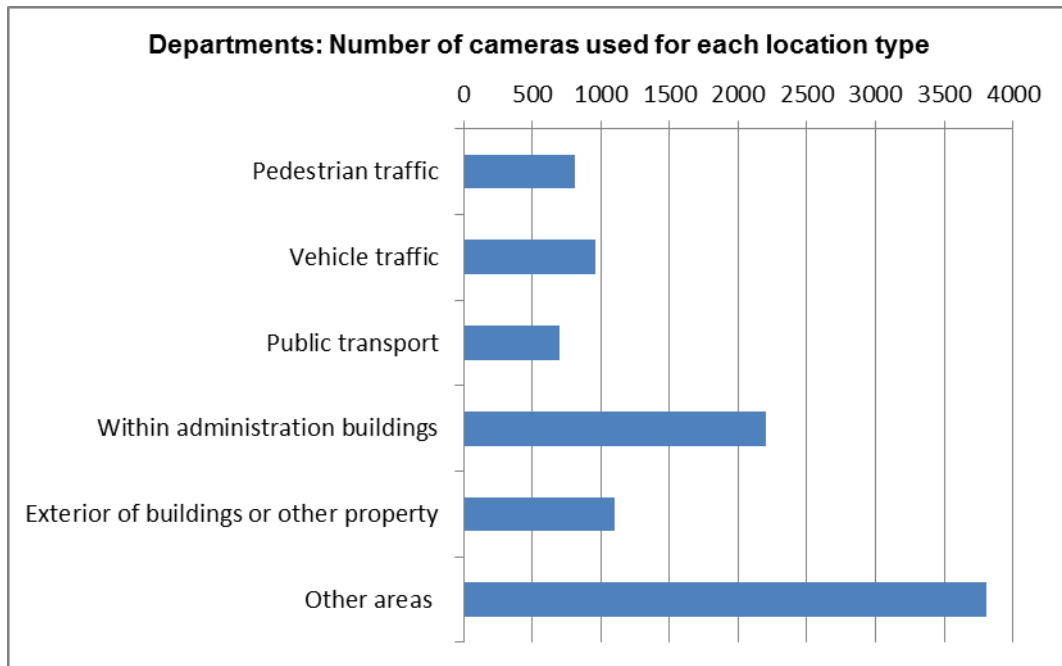
### 4 Placement of surveillance cameras

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More departments reported monitoring at each of the identified location types than in 2011-12, except for public transport which remained the same. Departments reported that 40% of all the fixed surveillance cameras were used for monitoring other areas. The comments on the survey indicated that these other areas included schools; wildlife parks and the environment; entry and exit points for a wide range of government operated facilities; and car parks. Almost a quarter

<sup>1</sup> The methodology of this review takes into account that the Hospital and Health Service sector was part of Queensland Health in the 2011-12 survey.

of all cameras were used for monitoring within administration buildings, one in ten for monitoring the exterior of a building and one in ten for other property asset and vehicle traffic. Two departments reported using cameras to monitor public transport conveyances, with a significant growth in the number of cameras used for this purpose and a high number of cameras per department, at 350 cameras on average each. Departments on average used more cameras to monitor each location type than other government agencies.



**Chart D 4 Number of cameras used by departments for each identified location type. Note some cameras monitored multiple location types.**

*Implementation of policies and procedures*

Departments overall reported slightly more inclusion of privacy elements in their policies and procedures governing the operation of surveillance camera systems than agencies overall.

Half of the departments had implemented 13 or more of the identified privacy elements in policies and procedures out of the 16 specified.

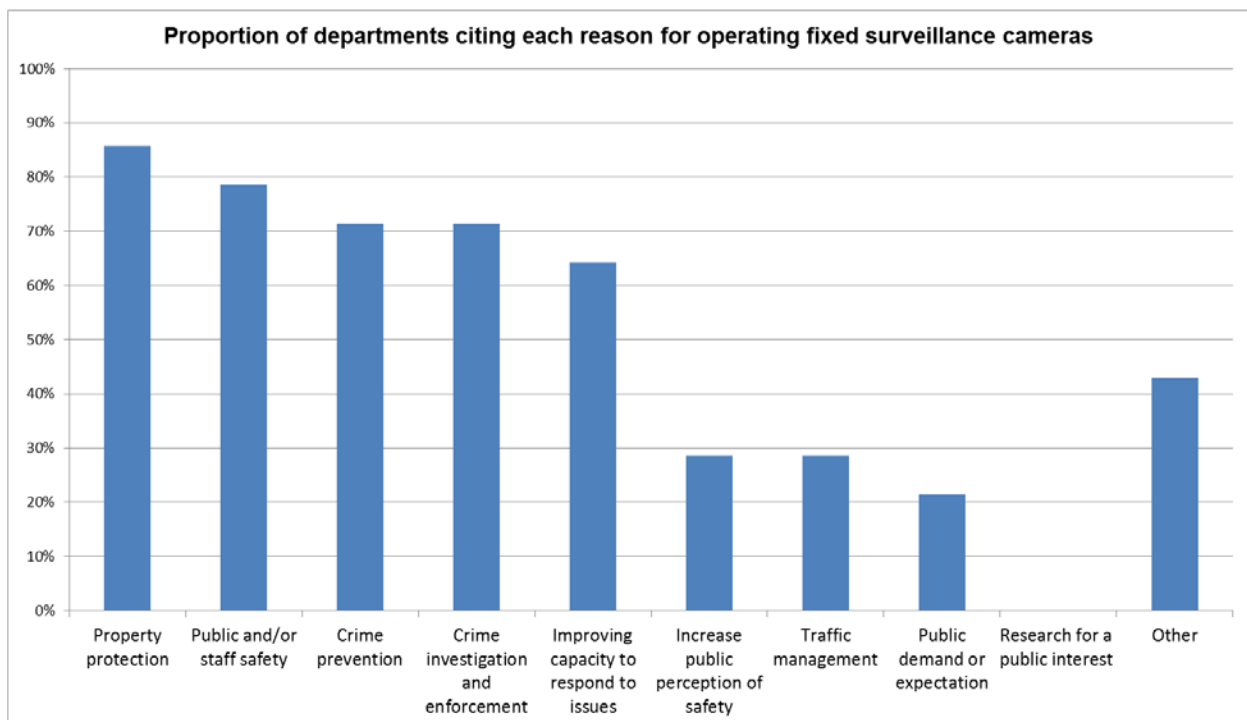
Four departments had implemented less than seven of the identified privacy elements in their policies and procedures. Departments reported lower levels of inclusion of five privacy elements in policies and procedures overall, three of which were about informing and making surveillance footage available to the community.

Departments reported a lower level of staff training in 2015 compared to 2011, with only three departments reporting full implementation of training for staff in surveillance camera system policies and procedures across the agency.

The survey identified that there was still significant room for improvement in this area.

## 5 Reasons for implementing surveillance cameras

In common with agencies overall, departments identified property protection; public and staff safety; crime prevention, investigation and enforcement; and improving the capacity to respond to issues as the most common purposes for installing fixed camera surveillance systems. Departments were more likely to identify improving the capacity to respond to issues and other reasons for implementing camera surveillance than agencies overall. The comments provided details of other reasons for implementing surveillance cameras, for example, addressing agency specific purposes and training.



**Chart D 5 Proportion of departments citing each reason for operating fixed surveillance cameras**

All responding departments (12) reported relying on at least one item of information or evidence to support the introduction of surveillance camera systems, which was most commonly described as ‘other information or evidence’.<sup>2</sup> The comments suggested that the other evidence used by departments to support the introduction of camera surveillance included special circumstances of property protection or public/staff safety. Only one department had completed a privacy impact assessment to support the introduction of their surveillance camera system.

<sup>2</sup> One department with multiple fixed camera surveillance systems reported evidence to support the introduction of some of their camera surveillance systems but that they didn’t know what evidence had supported the introduction of at least one of their other camera surveillance systems.



## **6 Making information on surveillance cameras publicly available**

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Over two thirds of departments operating camera surveillance systems stated they actively informed the community about the surveillance. Compared to other agency types, departments were less likely to have actively informed the community about surveillance than any other government sector.

The communication method that departments were most likely to use was a notice in the general area where cameras were used (nine out of ten departments providing information to the community). Other methods of informing the community were used by departments in a fairly even spread, with three or four departments using each of the other methods. Only two departments provided information to the public about how people can access footage, and the website scan confirmed this information was provided on the departmental websites for those two departments.

Four departments had information about departmental management of camera surveillance which was easy to find on their website. One additional department had information on the department's management of camera surveillance on the website, but a search was required to locate the information. While all of the departments which reported having surveillance cameras published personal information holdings on their websites, only two departments included camera surveillance footage in their lists of personal information holdings.

Four departments stated that they provided information on their camera surveillance system in a publicly available document. Two departments had an identified policy or procedure published on their website for managing camera surveillance. Only one of these policies provided detailed information on practices to protect camera surveillance footage against unauthorised access and disclosure and addressed use and disclosure.

## **7 Data storage and security of footage**

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All departments<sup>3</sup> stored at least some camera surveillance footage themselves, but not all departments had security measures in place to protect the camera surveillance footage.

All departments<sup>4</sup> reported storing at least some of their camera surveillance footage on their own facilities. Two departments also stored some of their camera surveillance footage in another government agency's facilities and in one case, some of the footage was not retained anywhere.

Departments reported being most likely to manage access to surveillance camera footage through limiting authorised access to specific individuals, physical security measures such as locked storage, password protection for stored footage and documented security procedures for access by external entities. Departments were more likely to report implementing these measures than agencies overall.

Fewer than half of departments adopted security measures of ensuring any instances of accessing footage were documented or subjecting footage to data encryption. One department did not manage footage formally.

## **8 Disclosure of camera surveillance footage**

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Almost three quarters of departments which operated surveillance cameras had received a request for access to the footage.

Departments received over 1,000 requests to access camera surveillance footage in the previous 12 months.<sup>5</sup> Departments received slightly fewer requests to access footage in relation to the proportion of fixed surveillance cameras operated by the sector.

Almost two thirds of these requests were directed to one department.

Nine departments reported having documented policies and procedures as to how an individual could seek access to footage containing images of them, and ten departments had documented policies and procedures for staff as to how to review footage and extract relevant material in response to a request for footage.

Two departments reported having publicly available information as to the process whereby people could seek access to footage. The website scan found this information on the website of one of these two departments and one additional department.

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<sup>3</sup> Note – some departments did not respond to this question.

<sup>4</sup> Note – some departments did not respond to this question.

<sup>5</sup> The response provided by the Queensland Police Service did not include the number of requests for footage.

Departments were less likely than agencies as a whole to have an administrative arrangement with another entity concerning access to camera surveillance footage.

## **9 Private sector contractors**

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Compared to the 2011 survey results and to other government agencies in 2015, departments reported being more likely to have their camera surveillance system operated in full or part by a private sector contractor. Six departments reported that their camera surveillance system was operated in full or part by a private sector contractor. There has been a change in the way contractors were bound by departments from including specific clauses addressing privacy compliance items in contracts to binding contractors to the privacy principles in general.

## **10 Mobile surveillance cameras**

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One third of Queensland departments reported operating mobile surveillance cameras.

Departments operated at least 826 mobile surveillance cameras, which was over half of all mobile cameras reported by Queensland government agencies.<sup>6</sup> Six departments operated a mix of temporary cameras, vehicle mounted, body-worn cameras, unmanned aerial vehicles and mobile cameras in other areas. The majority of these mobile cameras were operated in areas other than those listed in the survey (699 cameras).<sup>7</sup>

Departments with mobile camera systems reported being much more likely to have separate or specific policies and procedures for mobile camera operations than agencies overall.

Departments reported public and/or staff safety was the most common reason for having mobile camera surveillance systems with departments reporting multiple other additional reasons.

Only one department reported making information on the agency's use of mobile cameras publicly available.

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<sup>6</sup> The numbers provided by the Queensland Police Service did not include mobile traffic cameras.

<sup>7</sup> A single agency operated nearly all of these cameras used in other areas for agency-specific purposes.