# Closed-Circuit Television System (CCTV) Policy



Policy Relevant to:	Management, Team Members, families, visitors, contractors		
Last Reviewed:	New		
Next Review:	January 2026		
NQF:	12, 181, 195, 261, 263		
NQS:	2.1.1, 2.2.1, 3.1.1, 7.1.2		

# **Rationale**

Adventure Patch operates a Closed-Circuit Television System (CCTV) at some services to ensure the protection of assets and people.

# **Purpose**

Adventure Patch has the responsibility to provide a safe and secure working and learning environment for team members, children, visitors, and contractors. The use of CCTV will be used to monitor our physical assets, however, Adventure Patch reserves to right to use it for incident investigations.

Adventure Patch adheres to the Privacy Act 1988 (Privacy Act) and complies with the Australian Privacy Principles.

# **Implementation**

Adventure Patch uses CCTV to monitor the physical environment. It provides protection, assurance and security for Adventure Patch assets, team members and children in care and families.

Adventure patch will:

- Advise families of the use of CCTV upon enrolment.
- Notify team members upon initial site induction.
- Display relevant information signs at venues where CCTV is in place.
- Ensure that cameras are in clear view and not hidden away.

Child safety is embedded in our organisation, and the use of CCTV assists in our risk management and control measures to, identify, mitigate and prevent risks to children.

#### Camera Use

CCTV operating at Adventure Patch services comprise of:

- Multiple fixed position cameras
- An online portal for monitoring
- Network Video Recorder (for data storage)
- Public Information Signs

## Storage of Footage

CCTV footage is stored on a network video recorder at the relevant Adventure Patch locations for up to three (3) months.

POLS0049 Last reviewed March 2024



#### **Camera Locations**

Service	Location	
Mountain View CCC	Entry & Exit points, external yards	
Ocean View CCC	Entry & Exit points, external yards	
Blackmans Bay OSHC	Deck entrance area	
Diamond Drive Offices	Entry & Exit Points	
	Carpark & Rear of site	

The CCTV recording system operates in real mode, monitoring the site continuously 24 hours a day, 7 days a week throughout the year. These locations may change from time to time.

#### **Use of CCTV Data**

Footage and information collected via the recording system will be governed by <u>Australian Privacy Principles</u> and all relevant staff will be kept up to date with requirements under Australia's privacy law (Some Commonwealth and State laws restrict the use of listening, optical, data, and tracking surveillance devices).

Investigations of incidents any rely on CCTV recording; any such investigations will be carried out in accordance with the principles of natural justice and procedural fairness.

Where an incident has occurred, or an allegation is made, the CEO or DCEO may review the recorded CCTV to find out what occurred and who was involved. This may include viewing footage before, during and after the incident with enough detail to recognise those present and what happened including events leading up to and immediately after the event.

All requests for access or for disclosure must be in writing, if access is denied then the reason is also documented. If access to or disclosure of images is allowed the following must be documented:

- 1. The date and time at which access was allowed or the date on which disclosure was made.
- 2. The identification of the individual making the request or the third party allowed access or to whom disclosure was made.
- 3. The reason for allowing access or disclosure.
- 4. The reason for refusing to supply the images requested.

Access to the recordings will only be disclosed to:

- 1. The Office of the Independent Regulator for Child and Youth Safe Organisations, the Ombudsman, authorised representatives of *Strong Families Safe Kids* to assist with investigations on 'child protection' (e.g., abuse, neglect, and ill-treatment).
- 2. A member or officer of a law enforcement agency e.g., Police for use in assisting with investigations.
- 3. Adventure Patch management on duty to investigate situations that may have occurred.
- 4. A parent or guardian provided there is no breaching of another individual's privacy.
- 5. If third-party images are to be disclosed, the third-party images are to be disguised or blurred. This may be at the expense of the individual making the request.



# Adventure Patch will comply with current CCTV Australian Privacy laws to ensure:

- All team members and families have been notified in writing about the surveillance devices at our services including:
  - o The kind of surveillance to be carried out (camera, computer, or tracking)
  - How the surveillance will be carried out
  - o When the surveillance will start and if it will be continuous or intermittent
  - o Whether the surveillance will be for a specified limited period, or ongoing
  - Who has access to the footage (police, legal representatives)
  - o How and when the footage will be deleted
- Clear expectations of staff and educators in the workplace and their responsibility for upholding the Service's privacy obligations have been discussed.
- All cameras are visible.
- Signs are placed at the entrance of the service to advise staff, families, and visitors about the surveillance.
- There is no external access to the footage (e.g., families or staff members cannot log in and view footage)
- Cameras are not installed in private areas such as bathrooms or shower areas (for employees or children)
- Maintenance and upgrades of cameras are conducted as required.
- Cameras are positioned to ensure the most effective coverage of Adventure Patch property.
- Compliance with the Privacy Act, including handling of any personal information.
- CCTV Footage is kept secure and destroyed or de-identified when it is no longer required.
- Confidentiality is always maintained.
- The correct time and date are covered.
- A request to view a recording is per Australian law.
- New employees, students, and volunteers are provided with a copy of the CCTV Policy as part of their induction.
- Families are provided with a copy of this policy/ or access to this policy during enrolment or orientation to our services.

## **Related Policies**

Child Safe Environment Policy	Record Keeping and Retention Policy	
Code of Conduct	Supervision Policy	
Privacy and Confidentiality Policy	Work Health and Safety Policy	

## Sources

Australian Government, Office of the Australian Information Commissioner. (2019). Australian Privacy Principles: <a href="https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/">https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/</a> Education and Care Services National Regulations. (Amended 2023).

Fleming, J. (2016). Childcare centre safety. *Belonging Early Years Journal (5)* 1, 86-88. NSW Government, Office of the Children's Guardian *Child Safe Standards* (2020). *Privacy Act* 1988

Revised National Quality Standard. (Amended 2023).

Workplace Surveillance Act 2005



# **Review History**

Policy Reviewed By:	Tim Short	CEO	March 2024
POLICY REVIEWED	New	NEXT REVIEW DATE	March 2026
Modifications	New Policy		
POLICY REVIEWED	PREVIOUS MODIFICATIONS		NEXT REVIEW DATE
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# Signed

CEO:	
Manager:	All