

# Closed-Circuit Television System (CCTV) Policy



|                                 |   |
|---------------------------------|---|
| <b>Policy Relevant to:</b>      | Management, Team Members, families, visitors, contractors |
| <b>Last Reviewed:</b>           | January 2026  |
| <b>Next Review:</b>             | January 2028  |
| <b>ECS National Law:</b>        |   |
| <b>ECS National Regulation:</b> | r12, r181, r195   |
| <b>NQS:</b>                     | 2.2, 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 the 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.

Adventure Patch is committed to the adoption of the National Model Code and guidelines to implement child safe practices around the use of electronic devices for taking images or videos of children while providing education and care. The storage of images or video recordings taken by CCTV is stored securely and only accessed by identified management personnel.



## 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.

## 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<br>Carpark & Rear of site |
| Launceston Office     | Front of building                             |

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.

Any recorded footage will be destroyed or de-identified when it is no longer needed for the purpose it was collected.

## Use of CCTV Data

Footage and information collected via the recording system will be governed by [Australian Privacy Principles](#) 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 that 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 footage to determine what happened 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, and 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 breach 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:
  - The kind of surveillance to be carried out (camera, computer, or tracking)
  - How the surveillance will be carried out
  - When the surveillance will start, and if it will be continuous or intermittent
  - Whether the surveillance will be for a specified, limited period, or ongoing
  - Who has access to the footage (police, legal representatives)
  - 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<br>Code of Conduct<br>Privacy and Confidentiality Policy | Record Keeping and Retention Policy<br>Supervision Policy<br>Work Health and Safety Policy |
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### Sources

Australian Children's Education & Care Quality Authority. (2024). [Taking Images and Video of Children While Providing Early Childhood Education and Care. Guidelines For The National Model Code](#)

Australian Government, Office of the Australian Information Commissioner. (2019).

Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/>

[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

Workplace Surveillance Act 2005

### Review History

|                     |  |                  |              |
|---------------------|--|------------------|--------------|
| Policy Reviewed By: | Tim Short  | CEO              | January 2026 |
| POLICY REVIEWED     | January 2026   | NEXT REVIEW DATE | January 2028 |
| Modifications       | <ul style="list-style-type: none"> <li>Minor policy maintenance</li> <li>Updated regulations</li> <li>Added Launceston Office to the locations list</li> <li>Sources list checked</li> <li>Added Child Safety</li> </ul> |                  |              |
| POLICY REVIEWED     | PREVIOUS MODIFICATIONS   | NEXT REVIEW DATE |              |
| March 2024          | <ul style="list-style-type: none"> <li>New Policy</li> </ul>   |                  |              |

### Signed

|          |   |
|----------|---|
| CEO:     |  |
| Manager: | S. Norris   |