

Closed-Circuit Television System (CCTV) Policy

Scope

This policy applies to children, families, staff, management, Approved Provider, Nominated Supervisor, students, volunteers and visitors (including contractors) of the Service.

Statement

Our Service believes in the operation of Closed-Circuit Television System (CCTV) to ensure the health, safety and protection of children, staff, educators, parents and visitors of the Service.

Legislative requirements

NATIONAL QUALITY STANDARD (NQS)

QUALITY AREA 2: CHILDREN'S HEALTH AND SAFETY		
2.2	Safety	Each child is protected.

QUALITY AREA 7: GOVERNANCE AND LEADERSHIP		
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service.

EDUCATION AND CARE SERVICES NATIONAL REGULATIONS

12	Meaning of serious incident
181	Confidentiality of records kept by approved provider
195	Application of Commonwealth Privacy Act 1988

Related Policies

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

Our Service has the responsibility to provide a safe and secure working and learning environment for staff, children, visitors and contractors. The use of Close Circuit Television (CCTV) installed at the Service aims to address crime prevention strategies to reduce concerns, deal with complaints and support investigations. Our Service adheres to the Privacy Act 1988 (Privacy Act) and comply with the Australian Privacy Principles.

Strategies

All strategies detailed below are to be endeavoured to be implemented to the extent reasonably practicable.

Implementation

Our Preschool uses Closed-Circuit Television (CCTV) to monitor the physical environment. It provides protection and security for staff and children in care, assisting in assuring families that their children are in a safe environment and may also assist with misunderstandings, damages to the Preschool, theft and potentially false accusations by providing digital evidence. Child safety is embedded in our organisation, and we believe the use of CCTV assists in our risk management strategies to prevent, identify and mitigate risks to children.

Camera Use

Closed-Circuit Television (CCTV) operates at the Preschool and comprises of:

- 5 fixed position cameras
- A monitor
- Digital Hard Drive Recorder
- 3 Public Information Sign

Camera Locations

- Foyer
- Hallway
- Children's classrooms
- Children's playground

The CCTV recording system operates in real mode, monitoring the site continuously 24 hours a day. 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 (There are some Commonwealth, State and territory laws that restrict the use of listening, optical, data and tracking surveillance devices).

Access to the recordings will only be disclosed to:

1. the Ombudsman NSW to assist with investigations on 'child protection' (e.g., abuse, neglect and ill treatment).
2. to a member or officer of a law enforcement agency e.g., Police for use in assisting with investigations.
3. the Approved Provider, Nominated Supervisor / Responsible Person on duty to investigate situations that may have occurred.

Storage of Footage

CCTV footage is kept in a secure location at the Preschool for a period of up to 30 days. Any recorded footage will be destroyed or de-identified when it is no longer needed.

The Approved Provider / Management / Nominated Supervisor:

The Approved Provider/Management/Nominated Supervisor will comply with current CCTV Australian laws, to ensure:

- all staff, educators and families have been notified in writing about the surveillance devices at the Preschool 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 and
 - 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 Preschool's privacy obligations have been discussed
- all cameras are clearly visible
- signs are placed at the entrance of the Preschool 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 and children)
- maintenance and upgrades of cameras are conducted as required
- cameras are positioned to ensure the most effective coverage
- 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 maintained at all times
- the correct time and date are covered
- a request to view a recording is in accordance with 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 the Preschool

Continuous Improvement/Reflection

Our CCTV Policy will be reviewed on an annual basis in consultation with children, families, staff, educators and management.

Source

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

Revised National Quality Standard. (2018).

Workplace Surveillance Act 2005

Review

POLICY REVIEWED	DECEMBER 2023	NEXT REVIEW DATE	October 2024
VERSION NUMBER	V6.10.23		
MODIFICATIONS	<ul style="list-style-type: none"> • annual policy review • no major changes to policy • updated National Regulations revised 2023 • sources checked for currency 		
POLICY REVIEWED	PREVIOUS MODIFICATIONS	NEXT REVIEW DATE	
MAY 2023	<ul style="list-style-type: none"> • policy maintenance - no major changes to policy • hyperlinks checked and repaired as required • minor formatting edits within text • continuous improvement/reflection section added 	OCTOBER 2023	
November 2021	<ul style="list-style-type: none"> • New policy created 	October 2022	