

Closed-circuit Television System (CCTV) Policy

QUALITY AREA 2 & 7

Purpose

Renown Kindergarten uses Closed Circuit Television (CCTV) cameras to help provide a safe and secure environment for children, staff, families, guardians, volunteers and visitors. CCTV may assist in deterring and investigating incidents, while respecting the privacy of our community. Its primary use is to protect against security breaches, including vandalism, theft, or unauthorised access to the premises.

Renown Kindergarten operates CCTV in external locations only as detailed in this policy. The aim of this policy is to clearly outline the purpose, use of, and access to CCTV recordings, to ensure the safety and security of all attendees, and to ensure compliance with all applicable laws.

Scope

This policy applies to the approved provider or persons with management or control, nominated supervisor, persons in day-to-day charge, early childhood teachers, educators, staff, students, volunteers at Renown Kindergarten.

Renown Kindergarten adheres to all relevant laws, including but not limited to, the Privacy Act 1988 and complies with the Australian Privacy Principles.

Relevant Standards and Regulations

This policy aligns with:

- **National Quality Standard**
 - QA2: Children's Health and Safety – Each child is protected.
 - QA7: Governance and Leadership – Effective systems support safe service operation.
- **Education and Care Services National Regulations**
 - Reg 12: Meaning of serious incident
 - Reg 181: Confidentiality of records
 - Reg 195: Privacy Act 1988 (Cth) compliance
- **Other related policies at Renown Kindergarten**
 - Child Safe Environment Policy
 - Privacy and Confidentiality Policy

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- Supervision Policy
- Work Health and Safety Policy

Definitions

Authorised user: Authorised user means a person who has been authorised by the approved provider or the approved provider's nominee. For example, authorised users may include: Director; Nominated Supervisor; Executive committee member, staff members; parents accessing footage that is directly related to themselves, or their child and property; third party consultants, (e.g., legal advisers, IT contractors); and officers from authorised agencies (e.g., police, child protection, family support, the regulatory authority). Note, access to CCTV footage is only granted in accordance with this policy and our obligations under privacy laws and other relevant Victorian laws

'CCTV' – Closed-Circuit Television, a video surveillance system used to monitor designated areas within our service

Personal information: Personal information refers to any information or opinion about an identified individual or an individual who is reasonably identifiable. What is personal information will vary, but it includes CCTV footage if individuals can be identified

Surveillance device: Surveillance device is any device that is capable of recording visual or audio content

Implementation & Installation

Renown Kindergarten is responsible for ensuring that the CCTV system is installed and operates in compliance with relevant laws and regulations.

Renown Kindergarten will ensure that:

1. Any third party engaged to install or service its CCTV system is qualified, licensed, and reputable.
2. Cameras will be installed in accordance with relevant laws and regulations;
3. Cameras will be clearly visible and not concealed in any way;
4. All cameras and systems are maintained and serviced as per manufacturer's instructions.
5. Displaying clearly visible signage at the entrance of the service to notify staff, families and visitors about surveillance

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Location of Cameras for Use

Renown Kindergarten will ensure that the location of any CCTV camera is such to maintain the dignity of those at the service and provide coverage to meet the purpose of the CCTV system. Cameras are to be directed at areas rather than individuals.

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

- 3x fixed position cameras
- Ring App accessible via log in by Authorised Person
- 2x Public Information Sign

Camera Location :

- Front entry
- Outdoor play space, above the veranda.
- Back emergency gate

Use and Storage of CCTV

- Cameras are positioned only in **common areas** such as entrances, outdoor play spaces, and pathways.
- CCTV is **not** used in bathrooms, nappy-change areas, or private spaces.
- Footage is recorded and stored securely for a limited period (usually 30 days), after which it is automatically deleted unless required for investigation.
- CCTV is used for safety, security, and operational purposes only.
- 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 Australian privacy law.
- If footage is required for an investigation, it may be stored for longer, in line with legal requirements.
- All recordings are kept securely and destroyed or de-identified once no longer required.

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Review and Access to Footage

Viewing and access of recorded footage is strictly limited.

- Requests to view footage must be made in writing to the **Nominated Supervisor or Committee of Management**.
- Footage may only be viewed if:
 - It relates directly to the person making the request, their child, or their property;
 - It is required for an incident, investigation, or legal matter; and
 - Approval is granted by the Committee of Management.
- Families and staff cannot directly access or download footage.
- Footage may only be released to police, regulatory authorities, or as required by law.

Requests to Review Footage

Where an incident has occurred or an allegation is made, authorised user of Renown Kindergarten (Director, President, Nominated Supervisor) may review recorded CCTV to find out what happened and who was involved. This may include views 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 to view, access or have released any CCTV recording must be immediately referred to the Director of Renown Kindergarten for consideration. Renown will respond within a reasonable timeframe to any request, with consideration to the length of time the image is stored for and the length of time taken to search for and view the image.

Any images requested to be viewed by a Renown Kindergarten staff member, family or visitor of the centre may only be granted when:

1. it is for a lawful purpose;
2. the request is made in writing;
3. it directly involves the person making the request, or their child or property;

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4. it is related to an incident or investigation, or the identification of an incident or investigation.

Where a request to view or access the footage is approved by the Director:

1. the footage must be viewed in the first instance by at least two of the authorised users:

- a. Director
- b. President; or
- c. Nominated Supervisor; or
- d. persons with management control

2. the Reviewing Parties will advise the person making the request what is contained in the footage, based on the Reviewing Parties' detailed notes of the footage;

3. in limited circumstances, the Reviewing Parties may approve that the person making the request view the footage, but only where:

- a. there is some benefit material benefit to either the requester or to Renown Kindergarten in allowing the footage to be reviewed; and
- b. the viewing is for one of the purposes set out in this policy;
- c. the viewing would not cause a health, wellbeing or safety risk concern to another person, and would not be an unreasonable intrusion into another person's privacy; and
- d. the request is approved by a majority of the Renown Kindergarten Committee.

4. copies of the footage will not be given to the person making the request unless required to do so by law, and secondary copies (eg mobile phone recordings of the footage) are strictly prohibited.

Images will only be released to a third party when requested in writing for a lawful reason such as a subpoena by a Court of Law or for an official police investigation or in accordance with other relevant law requiring such disclosure (including to the relevant Commonwealth or State or Territory government departments which are concerned with the welfare of children or other children's services).

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Due to the inclusion of other persons in images recorded, these will not be released unless requested for a lawful purpose in a subpoena by a Court of Law or for an official police investigation or in accordance with other relevant law requiring such disclosure.

Any use of the CCTV system or recordings by any Renown Kindergarten staff member which is frivolous, for a private purpose or otherwise inconsistent with the purpose and procedures outlined in this policy will be considered gross misconduct and disciplinary action will be taken against anyone in breach of this policy. All use of CCTV systems or recordings by any Renown staff member should be in accordance with the guidelines set out in the Renown Kindergarten Privacy and Confidentiality Policy.

Where a request to view or access the footage is declined by Renown Kindergarten Director:

1. the person making the request may appeal the decision to the Renown Committee of Management by making a written submission for the Committee's review;
2. The Renown Committee of Management will then decide (by majority) whether the request should be approved; and
3. the decision of the majority of the Renown Committee of Management will be final.

Privacy and Data Security

- CCTV footage is stored securely with password-protected systems.
- The kindergarten complies with relevant privacy laws and the Education and Care Services National Regulations.

Notification

- Signage is displayed to inform all persons that CCTV is in operation.
- This policy is available to all families and staff.

MANAGEMENT/NOMINATED SUPERVISOR RESPONSIBILITIES:

Management 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 Service including:

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- 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 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 Service's privacy obligations have been discussed
 - all cameras are clearly 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 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
 - 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 Service

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ATTACHMENTS



- Attachment 1: Renown Kindergarten Authorised User Agreement

AUTHORISATION



This policy was adopted by the approved provider of Renown Kindergarten on August 2025

REVIEW DATE: *To be reviewed in line with ELAA policy templates September 2025.

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ATTACHMENT 1: Renown Kindergarten – Authorised User Agreement

Access and Management of CCTV Footage

Purpose

This agreement outlines the responsibilities, conditions, and limitations for any person authorised to access, view, manage, or store CCTV footage at Renown Kindergarten. The goal is to ensure CCTV footage is used only for lawful and approved purposes, in line with the Renown Kindergarten CCTV Policy, the Privacy Act 1988 (Cth), and other relevant regulations.

Authorised User Details

- **Full Name:** _____
 - **Position/Role:** _____
 - **Contact Number:** _____
 - **Email Address:** _____
 - **Date Authorisation Granted:** _____
 - **Authorised by (Name/Position):** _____
-

Conditions of Access

As an authorised user, I agree to:

1. **Use CCTV footage only for approved purposes** such as investigating incidents, ensuring safety, and meeting legal or regulatory requirements.
2. **Keep all CCTV footage strictly confidential** and not share, copy, or distribute footage without written approval from the Nominated Supervisor or Committee of Management.
3. **Access footage only when authorised** and never for personal, curiosity, or non-official purposes.

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4. **Comply with all relevant laws**, including the Privacy Act 1988 (Cth), Australian Privacy Principles, and the Surveillance Devices Act 1999 (Vic).
5. **Store footage securely** (password-protected, encrypted where possible) and delete/destroy footage when no longer required, in line with retention requirements.
6. **Ensure no unauthorised persons** can access or view footage.
7. **Report any breaches** of this agreement or suspected security issues immediately to the Nominated Supervisor or Committee of Management.

Prohibited Actions

I understand that I must NOT:

- Record, copy, download, or transfer CCTV footage to personal devices.
- Share CCTV images or footage via email, social media, or other channels without formal approval.
- Alter, delete, or tamper with CCTV recordings without authorisation.
- Use footage to monitor individuals for non-approved purposes.

Breach of Agreement

I acknowledge that any breach of this agreement may result in:

- Immediate withdrawal of access rights;
- Disciplinary action (for staff);
- Possible legal action under privacy or surveillance laws.

Acknowledgement and Declaration

I have read, understood, and agree to comply with this Authorised User Agreement and the Renown Kindergarten CCTV Policy.

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Authorised User Signature: _____ Date: _____

Witness Name: _____ Signature: _____ Date: _____

Office Use Only

Access Start Date: _____

Access End Date (if applicable): _____

Access Level: ☐ View Only ☐ View & Manage ☐ Admin Access

Notes:
