



Bacchus Marsh
Grammar

ELC POLICY

Early Learning Centre CCTV Policy

Approved by the School Principal 11 December 2024

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CCTV Policy

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1 Purpose and Background

- 1.1.1 This policy sets out our use and management of Closed-Circuit Television (CCTV), which we use for the safety and security of children, families, staff and visitors at our service
- 1.1.2 It helps us to comply with privacy and surveillance in Victoria, the Victorian Child Safe Standards and the National Model Code for Taking Images or Videos of Children

2 Scope

- 2.1.1 This policy applies to:
 - ‘Staff’: the approved provider, paid workers, volunteers, work placement students, and third parties who work at our service (e.g., contractors, subcontractors, self-employed persons, employees of a labour hire company)
 - Children in our care, their parents, families and care providers
 - Visitors to our service

3 Definitions

- 3.1.1 The following definitions apply to this policy and related procedures:
 - ‘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: contracted security officers; 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’ 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’ is any device that is capable of recording visual or audio content
 - ‘Parents’ includes guardians and persons who have parental responsibilities for the child under a decision or order of court
 - ‘Staff’ refers to paid employees, volunteers, students, and third parties who are covered in the scope of this policy

4 Policy Statement

4.1 Purpose of our CCTV system

- 4.1.1 We use a CCTV system to support a safe and secure environment for children, families, visitors and staff
- 4.1.2 We use it:
 - To protect against security breaches, including vandalism, theft, or unauthorised access
 - To verify incidents or allegations of security breaches, misconduct, or inappropriate behaviour
 - For evidence, if required by the police, courts, child protection authority, regulatory authority or another relevant authority, including evidence relating to incidents or allegations of harm or risk of harm to a child
- 4.1.3 To meet our obligations under privacy laws, we only use CCTV footage for the purpose it has been collected or a reasonably expected related purpose, or as required or authorised by law
- 4.1.4 Surveillance records may be used to take disciplinary action against a staff member

4.2 Consent and communication

- 4.2.1 We are transparent and inform families and staff members about why we use CCTV, and how we manage and store footage and privacy risks
- 4.2.2 At enrolment, parents are given access to this policy and must sign a CCTV consent form (attached)
- 4.2.3 Before their start date, staff are given access to this policy and must sign a CCTV consent form (attached)
- 4.2.4 Before we install or make significant changes to our CCTV system, the approved provider or nominated supervisor consult with and consider the views of staff and families
- 4.2.5 We welcome feedback and questions about our CCTV system from staff, families and visitors
- 4.2.6 Any complaints or allegations of breaches of our policies can be directed to the approved provider or nominated supervisor (see Complaint Handling Policy)

4.3 Written notice to staff

- 4.3.1 We follow best practice and give written notice to staff that we want to conduct surveillance of them
- 4.3.2 This notice should be given at least 14 days before the surveillance begins, unless otherwise agreed by staff. If a new staff member starts, we should notify the worker in advance of their start day of:
 - The kind of surveillance to be carried out (i.e., a CCTV system)
 - How the surveillance will be carried out, and
 - When the surveillance will start, and
 - Whether it will be continuous recording or intermittent
 - Whether it will ongoing or for a specified limited period
- 4.3.3 This policy serves as our written notice

4.4 CCTV system information

- 4.4.1 Our service and BMG ICT monitors and stores CCTV footage internally

4.5 CCTV cameras

- 4.5.1 Any new CCTV cameras must be approved by the approved provider before installation
- 4.5.2 We only allow companies or individuals who hold the appropriate licence in Victoria to install cameras
- 4.5.3 Cameras are clearly visible and not hidden
- 4.5.4 We display clearly visible signs indicating that CCTV cameras are in use at all entry points and in areas where cameras are installed
- 4.5.5 Our service has cameras in the following locations:
 - Outside of the building
 - Entry and reception
 - Outdoor play areas
 - Gallery space and foyer
- 4.5.6 CCTV cameras are never located so as to capture images in areas where children, staff or visitors would expect privacy or in non-work areas of the service, including in:
 - Adult toilets, bathrooms, showers and locker rooms
 - Children's nappy change rooms and bathrooms
 - Staff rooms and the office of the approved provider or nominated supervisor
 - Meeting room
- 4.5.7 Cameras do not record neighbouring properties
- 4.5.8 Only people who have been authorised by law or the approved provider can access CCTV cameras

4.6 Recording information

- 4.6.1 Recording is ongoing

4.6.2 Our system does not record sound

4.7 Use and disclosure of footage

4.7.1 We take our obligations under privacy laws seriously and only allow CCTV footage to be used and disclosed for the purpose we collected it, or as required or authorised by law (see our Privacy and Confidentiality Policy for a list of other circumstances where we may use or disclose personal information)

4.7.2 Only authorised users are permitted to access CCTV footage, and any access must comply with this policy and relevant legal obligations

4.7.3 If an incident occurs or an allegation is made, an authorised user (including an authorised third party) may review footage to investigate further. In this case, an authorised user may need to watch footage of before, during and after the time in question and footage may be stored for longer than our standard time

4.7.4 The authorised user must log their access to the footage, including the date, time, and reason for access

4.7.5 Individuals have a right to access their personal information. All requests by families, staff or visitors to use or disclose footage must be made in writing to the approved provider to consider. The approved provider can only grant access in the following circumstances:

- It is required or authorised under the law,
- It directly relates to that person (or their child) or property, and
- Any personal information of anyone else (including their image) has been deidentified (e.g., blurred or redacted)

4.7.6 Breaches of the use and disclosure of personal information are managed in line with our Privacy and Confidentiality Policy (see also our Technology and Device Use Policy)

4.8 Managing privacy and security

4.8.1 CCTV footage is protected from misuse, interference and loss, and from authorised access, modification or disclosure. For example, the approved provider ensures that:

- That only authorised users are given access to footage, and they are only allowed to use it according to our policy
- Footage is protected using strong passwords
- Footage data is encrypted during transit and storage
- Firewall and antivirus software is installed and regularly updated
- Backups are conducted regularly and stored securely
- Access logs are kept to track who has accessed footage and when
- There are regular audits and monitoring of access, including unauthorised access
- CCTV controls, monitors, physical backups and recorders are in a secure onsite area that is only accessible to authorised users

4.8.2 CCTV footage is generally not monitored in real time

4.9 Storage and retention

4.9.1 We store CCTV footage for at least 30 days

4.9.2 Footage data is stored in the cloud by a secure data centre that meets data security standards. It is encrypted and stored with restricted access protocols.

4.9.3 We do not retain footage longer than is necessary to fulfil its intended purpose, unless we need to keep it for longer for investigations or legal proceedings.

4.9.4 At the end of the retention period, footage is securely deleted or overwritten unless it is marked for retention

5 Principles

- 5.1.1 We are committed to ensuring the privacy and dignity of the children in our care. We balance our security measures with privacy rights
- 5.1.2 We collect, use, disclose, store, and destroy CCTV footage in accordance with the Australian Privacy Principles (see our Privacy and Confidentiality Policy), surveillance laws in Victoria, the National Model Code and Victorian Child Safe Standards
- 5.1.3 We are transparent about our use of CCTV. Everyone who enters our service is alerted to our use of surveillance, and families, staff and visitors are invited to give us feedback about our security measures
- 5.1.4 We manage security and privacy risks according to the law and best practice. Staff, families and visitors can be sure that we have strict protocols to protect their personal information

6 Policy Communication, Training and Monitoring

- 6.1.1 This policy and related documents can be found in our Policy Folder, Web site and OneDrive Policy folder
- 6.1.2 The approved provider and nominated supervisor provide information and other resources and support regarding the CCTV Policy and related documents
- 6.1.3 All staff (including volunteers and students) are formally inducted. They are access to>, review, understand and formally acknowledge this CCTV Policy and related documents before their first day of work
- 6.1.4 The nominated supervisor> runs a professional development program for each staff member, which covers this policy if it is relevant to the person's role
- 6.1.5 The approved provider and nominated supervisor monitor and audit staff practices and address non-compliance. Breaches to this policy are taken seriously and may result in disciplinary action against a staff member
- 6.1.6 At enrolment, families are given access to> our CCTV Policy and related documents
- 6.1.7 Families are notified in line with our obligations under the National Regulations when changes are made to our policies and procedures

7 Legislation (Overview)

7.1 Applicable Laws and Regulations

Law / Regulation / Standard	Description
<i>Privacy Act 1988</i>	Principal act protecting the handling of personal information
<i>Surveillance Devices Act 1999 (Vic)</i>	Regulates surveillance devices, including CCTV
<i>Charter of Human Rights and Responsibilities Act 2006 (Vic)</i>	Protection of human rights, including the right to privacy

7.2 National Quality Standard

Standard	Concept	Description
2.2	Safety	Each child is protected
5.1.2	Dignity and rights of the child	The dignity and rights of every child is maintained
6.1.1	Engagement with the service	Families are supported from enrolment to be involved in the service and contribute to service decisions
7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service

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7.3 National Principles for Child Safe Organisations

Most relevant principles
Child safety and wellbeing is embedded in organisational leadership, governance and culture
Families and communities are informed and involved in promoting child safety and wellbeing
Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
Policies and procedures document how the organisation is safe for children and young people

8 Related Documents

8.1 Key Policies

Child Safe Environment Policy | Technology and Device Use Policy | Photography and Video Policy | Privacy and Confidentiality Policy

8.2 Procedures

Roles and Responsibilities – CCTV (attached)

8.3 Resources

CCTV Consent forms (attached)

9 Sources

Legislation (as listed above) | Guide to the Australian Privacy Principles | Office of the Australian Information Commissioner Guidelines | Australian Cyber Security Centre resources | ACECQA’s Review of Child Safety Arrangements under the NQF – Final Report 2023 | National Quality Standard | National Principles for Child Safe Organisations | Fair Work Ombudsman – Workplace privacy best practice guide | National Model Code

10 Authorisation

ELC Document Name	CCTV Policy	
Name of Reviewer: Approved Provider	Principal Andrew Neal	Signature:
Name of Reviewer: Nominated Supervisor	Kerry Osborn	Signature:
Date Revised	December 2024	

11 History

Date	Amendment
March 2024	1. Reviewed
December 2024	2. Reviewed, no change, new formatting

12 Appendix A: Roles and Responsibilities – CCTV

Approved provider responsibilities (not limited to)

Ensure our service meets its obligations under legislation relevant to CCTV in the workplace and education and care services

Ensure this policy is in place and take reasonable steps to ensure that it can be followed

Notify/consult staff, families and visitors about the use of CCTV according to this policy. Ensure that new staff are given notice of our use of CCTV before their first day of work

Take reasonable steps to protect CCTV footage from misuse, loss, unauthorised access, modification or disclosure. Maintain tight security during the transmission, storage, and destruction of the footage

Allow individuals to access CCTV footage records directly related to them according to this policy

Ensure that cameras and CCTV signs are clearly visible. Do not allow cameras to be installed in areas that people would expect privacy or in non-work areas

Ensure that CCTV footage is only used and disclosed according to the law, this policy and our Privacy and Confidentiality Policy

Notify families at least 14 days before changing this CCTV Policy if the changes will: affect the fees charged or the way they are collected; or significantly impact the service's education and care of children; or significantly impact the family's ability to utilise the service

13 Appendix B: Resource – CCTV Consent Form for Parents

Purpose of CCTV surveillance

Bacchus Marsh Grammar, ELC, Woodlea is committed to providing a safe and secure environment for children, staff, families, and visitors. As part of our security measures, we use Closed-Circuit Television (CCTV) in specific areas of our service to monitor and deter unauthorised access, enhance safety, and protect property.

Consent and agreement

By signing this form, you acknowledge and consent to the following:

- I understand that CCTV cameras are installed in the locations identified in the [CCTV Policy](#) and that these areas are clearly marked with signage indicating CCTV is in operation
- I am aware that CCTV cameras will not be used in areas where privacy is expected, as identified in the [CCTV Policy](#)
- I acknowledge that the primary purpose of CCTV monitoring is to enhance safety and security within Bacchus Marsh Grammar, ELC, Woodlea
- I understand that CCTV footage may be considered personal information where individuals can be identified and, therefore, will be handled according to the Australian Privacy Principles
- I understand that CCTV footage may be reviewed by authorised users, including third parties as described in the [CCTV Policy](#)
- I consent to the secure storage of CCTV footage for a limited time and acknowledge that footage will be deleted after this period, unless it is required for ongoing investigations or legal proceedings
- I know that I may request in writing access to any footage involving me, my child or my property, and that access will be granted subject to legal and policy restrictions
- I understand that I have the right to withdraw my consent to CCTV monitoring provided I inform Bacchus Marsh Grammar, ELC, Woodlea in writing. I acknowledge that withdrawing consent will limit my or my child's access to the service

Child's name:
Parent's name:
Parent's signature:
Date:

14 Appendix C: Resource – CCTV Consent Form for Staff

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- I know that I may request in writing access to any footage involving me or my property, and that access will be granted subject to legal and policy restrictions
- I understand that CCTV records may be used to take adverse action (e.g., disciplinary action) against me
- I understand that I have the right to withdraw my consent to CCTV monitoring provided I inform Bacchus Marsh Grammar, ELC, Woodlea in writing. I acknowledge that withdrawing consent will limit my access to the service and, therefore, may affect my employment at the service

Staff member's name:

Staff member's signature:

Date: