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CLOSED-CIRCUIT TELEVISION SYSTEM (CCTV)

QUALITY AREA 7 | ELAA version 1.0

Version no.	Reviewed by	Authorised by	Date of issue	Amendments made
V1.0	CPELC FY2025 Committee & Management	CPELC FY2025 Committee & Management	22/9/2025	Introduced however the centre does not have CCTV. If we did we would implement the following below.
V1.0	CPELC FY2026 Committee & Management	CPELC FY2026 Committee & Management	20/10/2026	Introduced however the centre does not have CCTV. If we did we would implement the following below.

PURPOSE

The purpose of this policy is to establish a clear, lawful, and ethical framework for the use of Closed-Circuit Television (CCTV) at [Service Name]. This policy ensures that any implementation of surveillance supports the safety, wellbeing, and security of children, educators, families, and visitors while upholding the fundamental rights to dignity, privacy, and respectful care.

SCOPE

This policy applies to all individuals connected with the service, including the approved provider, management, educators, staff, volunteers, students, contractors, children, families, and visitors.

DEFINITIONS

The terms defined in this section relate specifically to this policy. For regularly used terms e.g. Approved provider, Nominated supervisor, Notifiable complaints, Serious incidents, Duty of care, etc. refer to the Definitions file of the PolicyWorks catalogue.

CCTV (Closed-Circuit Television): A video surveillance system where signals are not publicly distributed but are monitored and recorded for authorised use to enhance safety and security.

Surveillance Footage: The visual recordings captured by CCTV cameras, which may include images or videos of people, property, or activities within monitored areas.

Personal Information: Personal information has the meaning given under the *Privacy Act 1988 (Cth)*. It includes any recorded or unrecorded information about an identified or reasonably identifiable individual

Authorised Personnel: Individuals who have been granted specific permission to access CCTV footage, including the Approved Provider, Nominated Supervisor, or designated security or IT staff.

Restricted Access Areas: Locations within the service that are not open to the general public or children, such as staff rooms, storage areas, or administrative offices.

Monitoring: The process of observing activities and environments in real time via CCTV to ensure safety and compliance with policies.

Recording: The capturing and storing of surveillance footage on a physical or digital medium for later review or evidence.

Retention Period: The length of time that surveillance footage is stored before it is deleted or overwritten, unless required for investigation or legal proceedings.

Privacy Breach: The unauthorised access, use, or disclosure of personal information, including surveillance footage that identifies individuals.

POLICY STATEMENT

[Service Name] uses CCTV to support the safety and wellbeing of all children, families, staff, and visitors. The use of surveillance is lawful, proportionate, and transparent, and is guided by child safe principles, applicable privacy laws, and the Education and Care Services National Law and Regulations.

The service complies with all relevant legal obligations, including the *Privacy Act 1988 (Cth), Australian Privacy Principles, Surveillance Devices Act 1999 (Vic)* or applicable state legislation, and the Education and Care Services National Law and Regulations.

CCTV is only installed in locations identified through a documented risk assessment process. It supports physical security, assists in responding to incidents, and helps meet regulatory and legal obligations. Families and staff are informed about the use, purpose, and access arrangements for CCTV. All footage is managed and stored securely in accordance with strict privacy and security protocols to protect the dignity and rights of individuals.

CCTV is a supplementary safety measure and does not replace the need for active supervision, meaningful educator-child engagement, or robust governance practices. The professional judgment of educators and the relational quality of care remain central to the operation of the service.

CCTV LOCATIONS

CCTV cameras may be located at entry and exit points, reception, hallways, communal indoor areas, and external play spaces. Cameras will not be installed in any area where privacy is expected, including bathrooms, nappy change areas, sleep rooms, staff-only spaces, or prayer and breastfeeding areas. All cameras will be clearly visible and accompanied by appropriate signage.

RESPONSIBILITIES	Approved provider and persons with management or control	Nominated supervisor and persons in day-to-day charge	Early childhood teacher, educators and all other staff	Parents/guardians	Contractors, volunteers and students
R indicates legislation requirement, and should not be deleted					
1. Ensure CCTV use complies with surveillance and privacy laws	R	√			
2. Ensure this policy is in place and reasonably able to be followed	√	√			

3. Engage qualified, licensed contractors for CCTV installation	√	√			
4. Install CCTV only in approved areas, not in private/sensitive locations	R	√			
5. Ensure all cameras are clearly visible	R	√			
6. Display signage notifying CCTV use and its purpose	R	√			
7. Inform all individuals at enrolment/induction about CCTV	R	√			
8. Ensure all understand CCTV is not used to monitor staff or replace supervision	√	√			
9. Maintain CCTV system to ensure functionality and secure footage	√	√			
10. Restrict access to footage to authorised personnel only	R	√			
11. Ensure footage is stored securely and password protected	R	√			
12. Retain footage for defined period (e.g. 30 days) and delete securely unless required	R	√			
13. Provide clear protocols for reviewing footage	R	√			
14. Handle access requests per Privacy & Confidentiality Policy and law	R	√			
15. Ensure footage is reviewed by two authorised persons, not in presence of requester	R	√			
16. Prevent copies of footage being given to requester unless legally required; prohibit secondary copies	R	R			
17. Maintain register of viewed footage with full details	R	√			
18. Ensure maintenance and upgrades of CCTV as required	√	√			
19. Report faults, damage, or unauthorised access		√	√	√	√
20. Respond to policy breaches, including inappropriate use or disclosure of footage	R	R	√	√	√
21. Ensure CCTV supports child safety without creating a surveillance culture	√	√			
22. Comply with this policy, Privacy and Confidentiality Policy, and Code of Conduct	R	R	R		R
23. Respond to privacy breaches per the Privacy and Confidentiality Policy	R	R			
24. Respond to CCTV-related complaints as per Compliments and Complaints Policy	R	√			



USE, ACCESS AND REVIEW OF FOOTAGE

CCTV footage is the property of [Service Name] and is managed in accordance with relevant privacy, surveillance, and child safety laws. Access to footage is restricted to authorised personnel and may occur where it is necessary to support the health, safety, and wellbeing of children, staff, or visitors, or to comply with legal, regulatory, or internal investigative requirements.

Footage may be reviewed to support an incident investigation, complaint response, child protection report, security matter, or regulatory inquiry. All access must be justified, time-limited, and recorded in an internal access log.

Authorised personnel may approve access by third parties only where legally required or where it aligns with privacy and confidentiality obligations. In circumstances where an individual requests access to footage, such requests must be made in writing and will be considered based on applicable legislation, relevance to the individual, and whether de-identification of others is reasonably achievable.

Unauthorised access, reproduction, distribution, or mobile recording of footage is strictly prohibited. Any breach of these conditions may lead to disciplinary action and be reportable under relevant law or regulation.

STORAGE, SECURITY AND RETENTION

CCTV footage is stored in a secure encrypted system, with access limited to a small number of trained, authorised users. Strong password protection and regular system audits are used to prevent unauthorised access, modification, or loss.

Footage is retained for 60 days unless a specific incident requires longer storage. After this period, data is securely deleted or overwritten. Any incident footage that may be required for legal proceedings is downloaded securely, labelled with restricted access, and stored separately.

System maintenance and updates are conducted regularly. All faults, unauthorised access attempts, or data integrity concerns are reported immediately to the approved provider.

CONSENT, NOTIFICATION AND COMMUNICATION

All families are notified of CCTV use at the time of enrolment. Staff, contractors, and students are informed at induction. The presence and locations of cameras are clearly signposted.

In accordance with Victorian surveillance law and other applicable state-based frameworks, written notification will be provided at least 14 days in advance before the introduction of any new surveillance equipment or changes to existing placement.

This policy and associated information constitute the formal written notice of surveillance. Consent forms are included in enrolment and staff documentation.

LEGISLATION AND STANDARDS

Relevant legislation and standards include but are not limited to:

- Australian Privacy Principles
- Child Safe Standards (Vic and National Principles for Child Safe Organisations
- Child Safe Standards (Vic)
- Children, Youth and Families Act 2005 (Vic)
- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2011
- National Quality Standards
- Occupational Health and Safety Act 2004 (Vic)
- Privacy Act 1988 (Cth)
- Surveillance Devices Act 1999 (Vic)
- Fair Work Act 2009 (Cth)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)

SOURCES AND RELATED POLICIES

SOURCES

- Office of the Victorian Information Commissioner (OVIC): www.ovic.vic.gov.au

- Office of the Australian Information Commissioner (OAIC): www.oaic.gov.au/privacy/guidance-and-advice
- Australian Children's Education & Care Quality Authority (ACECQA):www.acecqa.gov.au

RELATED POLICIES

- Child Safe Environment and Wellbeing
- Code of Conduct
- Compliments and Complaints
- Enrolment and Orientation
- Governance and Management of the Service
- Privacy and Confidentiality

EVALUATION

In order to assess whether the purposes of the policy have been achieved, the approved provider will:

- notifying all stakeholders affected by this policy at least 14 days before making any significant changes to this policy or its procedures, unless a lesser period is necessary due to risk *(Regulation 172 (2))*.

ATTACHMENTS

- Attachment 1: CCTV Consent Form for Families
- Attachment 2: CCTV Consent Form for Staff

AUTHORISATION

This policy was adopted by the approved provider of Columbia Park Early Learning Centre on 20/10/2026.

REVIEW DATE: 20/10/2027

ATTACHMENT 1. CCTV CONSENT FORM FOR FAMILIES

Purpose of CCTV surveillance

Columbia Park Early Learning Centre is committed to providing a safe and secure environment for children, families, staff, and visitors. Closed-Circuit Television (CCTV) is used in designated areas to offer safety, deter unauthorised access, and protect property.

Consent and agreement

By signing this form, I confirm that:

- I understand CCTV is installed only in locations permitted under the CCTV Policy and that these areas are clearly signposted.
- I acknowledge that CCTV is not used in private areas such as bathrooms, nappy change areas, sleep rooms, staff facilities, breastfeeding or prayer spaces.
- I understand the primary purpose of CCTV monitoring is to enhance safety and security, not replace active supervision or monitor staff performance.
- I acknowledge that CCTV footage may be considered personal information and will be managed in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles.
- I understand that access to footage is restricted to authorised personnel and may only be shared externally where legally required.
- I consent to footage being stored securely for the defined retention period under the CCTV Policy and securely deleted thereafter, unless required for investigation or legal proceedings.
- I am aware I may request in writing access to footage that reasonably relates to me, my child, my property, subject to applicable law and privacy obligations.
- I understand I may withdraw my consent Columbia Park Early Learning Centre in writing at any time. Withdrawal may impact my or my child's access to the service.

Child's name:

Parent/Guardian name:

Signature:

Date:

ATTACHMENT 1. CCTV CONSENT FORM FOR STAFF

Purpose of CCTV surveillance

[Service Name] is committed to maintaining a safe and secure environment for all staff, children, families, and visitors. Closed-Circuit Television (CCTV) is used in designated areas to support safety, deter unauthorised access and protect property.

Consent and agreement

By signing this form, I confirm that:

- I understand CCTV is installed only in locations permitted under the CCTV Policy and in those areas clearly signposted.
- I acknowledge that CCTV is not installed in private areas such as bathrooms, staff rooms, breastfeeding or prayer spaces.
- I understand the primary purpose of CCTV monitoring is to enhance safety and security, not to monitor staff performance.
- I acknowledge that CCTV footage may be considered personal information and will be managed in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles.
- I understand that access to footage is restricted to authorised personnel and may only be shared externally where legally required.
- I consent to footage being stored for the defined retention period under the CCTV Policy and securely deleted thereafter, unless required for investigation or proceedings.
- I am aware I may request in writing access to footage that reasonably relates to me, subject to applicable law and privacy obligations.
- I understand that I may withdraw my consent in writing at any time and that withdrawal however may impact my access to the workplace.

Staff member's name:

Staff member's signature:

Date: