



Close Circuit Television Requirements Policy

Hierarchy	Education and Care – Policy Document		
Version	Approved by	Effective Date	Next review date
1	SCECS Management	October 2025	October 2027

1. PURPOSE

This requirement applies to Sydney Catholic Early Childhood services (SCECS) centres where CCTV technology is installed.

SCECS operates Closed Circuit Television (CCTV) Systems in various internal and external locations in some SCECS centres.

The aim of this requirement is to clearly outline the purpose of, use of, and access to CCTV recordings by SCECS.

SCECS operates CCTV systems for the purposes of:

- Assisting in the overall safety, security, and safeguarding of individuals, premises, and equipment.
- Facilitating the identification and / or investigation of any incident which may necessitate action being taken including evidence for concerns or allegations of child abuse, neglect and/or harm.
- Acting as a deterrent against criminal activity, such as vandalism
- Recorded visual imagery is retained and used only in accordance with the purpose for which the CCTV system was installed, or a reasonably expected related purpose.
SCECS will not use or disclose imagery to a third party without consent for any other purpose, otherwise than in accordance with the provisions of this requirement or unless it is authorised or required by law.
- SCECS adheres to all relevant laws, including but not limited to, the Privacy Act 1988 and complies with the Australian Privacy Principles.

2. SCOPE

This policy applies to all SCECS staff, children, families and visitors to the sites where CCTV technology is installed.

3. POLICY STATEMENT

4. ROLES AND RESPONSIBILITIES

Situation	Guidance
<p>Installation and Maintenance</p>	<p>SCECS is responsible for ensuring that CCTV installation and use are compliant with relevant laws and regulations. SCECS and the Nominated Supervisor for the relevant centre will ensure that:</p> <ul style="list-style-type: none"> ● SCECS Property and facilities team engages the services of qualified, licensed, and reputable third-party contractors to install its CCTV systems who meet the SCECS contractor management requirements ● Cameras are only installed in accordance with relevant laws and regulations. ● CCTV cameras and storing devices are maintained and checked for operational use as per manufacturer instructions. ● CCTV cameras are clearly visible and not concealed in any way. ● Cameras do not record any neighbouring property. <p>SCECS and the Nominated Supervisor for the relevant centre will ensure that reasonable steps are taken to notify those entering and using the SCECS premises of the use of CCTV, this includes:</p> <ul style="list-style-type: none"> ● Access to the SCECS CCTV policy and collection notice upon child enrolment and checking in of visitors. ● Providing families with the CCTV consent form for signing and returning upon child enrolment (and if consent is not provided then making other enrolment arrangements) ● Notifying employees in writing at least 14 days before the CCTV system commences recording and upon employment of new employees. <p>Erecting clearly visible signage at the entrance of the building to notify staff, families, and visitors about CCTV surveillance</p>
<p>Location of Cameras for Use</p>	<p>SCECS and the Nominated Supervisor for the relevant centre 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. Specific camera locations will vary from centre to centre. However, in any given centre a clearly visible camera may for instance be present in the following locations:</p> <ul style="list-style-type: none"> ● Carpark and exterior of the building ● Entry and reception areas ● Hallways ● Kitchens ● Learning spaces; and ● Outdoor play spaces ● Sleep spaces <p>Cameras will not be placed in any of the following locations:</p> <ul style="list-style-type: none"> ● Adult Toilets, bathrooms, showers and locker rooms ● Children's nappy change and bathrooms ● Parent's Room ● Centre Director's Office ● Staff rooms

	<p>The CCTV systems that SCECS use do not record sound.</p> <p>The planning and design of each CCTV system has endeavoured to ensure that it will provide maximum effectiveness and efficiency within the confines of the law, however, it is not possible to guarantee that any system will cover or detect every single event which takes place at the premises or within the areas of coverage.</p> <p>SCECS will review the systems periodically to ensure that they are functioning correctly, whether additional cameras are necessary and that the existing cameras are situated in appropriate locations (and installed for appropriate coverage). SCECS also reserves the right to remove any one or more cameras at any SCECS premises at its discretion.</p>
Monitoring	<p>SCECS does not keep imagery for longer than strictly necessary to meet its own purposes for recording them (this period has been generally treated as 30 days). On occasion, SCECS may need to retain imagery for a longer period, for example internal investigations, legal proceedings or where a law enforcement body or regulators are investigating a crime or incident, to afford them the opportunity to view the imagery as part of an active investigation. In most circumstances, SCECS would only need to retain imagery for a short period of time because incidents will come to light very quickly.</p> <p>Imagery is generally not monitored in real time unless there are exceptional circumstances such as but not limited to flooding, fire, and centre being in any potential or actual harm.</p>
Storage of Imagery	<p>The imagery recording systems that SCECS uses as part of its CCTV system are protected against unauthorised access or vandalism.</p> <p>The CCTV monitoring devices will be hard wired into the building's structure and will not transmit using Wi-Fi or Bluetooth. Cameras will be placed in secure locations where they are unlikely to suffer from criminal attacks or unauthorised access. Computers able to access imagery are password protected and are part of a secure network. All data will be stored on site and not on the internet/cloud. Access is only provided to authorised members of the management team at SCECS. Access may also be granted to SCECS centre support teams, third party consultants who assist SCECS in operating its business (including legal advisors and technology service providers), and child protection agencies or family/staff support agencies when we reasonably believe that a child or staff member is at risk of significant harm.</p>
Use of Imagery	<p>The CCTV recording system operates in real mode, monitoring the centre continuously 24 hours a day, 7 days a week throughout each year. The system records moving imagery but does not record audio.</p> <p>The Centre Director and SCECS Operations Management (OM) team have overall responsibility for the CCTV imagery. Viewing of recorded imagery of CCTV is restricted to those staff only who need to have access in accordance with the purposes of this policy.</p>

SCECS may use CCTV for the purposes provided in this policy, including relying on CCTV recordings to investigate alleged breaches of SCECS policies, laws, regulations, and standards which impact the safety of the children, staff and facilities. Any such investigation will be carried out in accordance with SCECS policies and the principles of natural justice and procedural fairness.

Where an incident has occurred or an allegation is made, a SCECS authorised member of the OM Team may review recorded CCTV to seek to find out what happened and who was involved. This may include viewing of recorded CCTV before, during, and after the incident with enough detail to recognise those present, and what happened in the recorded CCTV including events leading up to and immediately after the event. The OM team may also separate and store footage that is relevant to the investigation.

Use of CCTV during a Natural Disaster/Weather Event:

Access to live CCTV imagery may be used to inform decisions during a natural disaster or weather event that impacts the safety of SCECS staff, families, children and the facilities.

Live footage will only be accessed when there are no staff, families and children on site to provide input and guidance to the situation

Requests for viewing of live CCTV imagery will be made to the SCECS Operations Management (OM) team, in accordance with the Closed Circuit Television – Request & Retrieval of CCTV imagery Procedure.

All other requests to view, access, or have released any CCTV recording must be immediately referred to the SCECS OM team for consideration. SCECS will respond within a reasonable timeframe to any request, with consideration to the length of time the image is stored, and the length of time taken to search for and view the image, and in any event within any timeframe required by law.

Unless provided in this policy or required by law, any imagery requested to be viewed by a SCECS staff member, family or visitor of the centre or anyone else will only be granted when:

- It is requested in writing, and if required seek legal advice.
- It is for a lawful purpose.
- It directly involves that person or his/her child or property; and
- Any personal information of anyone else has been deidentified, blurred, and/or redacted.

Imagery will only be released to a third party (other than as provided in this policy) when requested in writing for a lawful reason such as access to a requester's own personal information in accordance with privacy laws or by a Court order or subpoena or for an official police investigation or in accordance with other information sharing provisions, or relevant laws concerning such disclosure (including the relevant Commonwealth or State government departments and regulatory bodies which are concerned with the welfare of children or other children's services).

	<p>Individuals have a right of access to their Personal Information in accordance with Australian privacy laws and SCECS's Privacy Policy. All Individual access requests are to be processed by the OM team. Individuals requesting access to their Personal Information are to be provided with a copy of this Policy and SCECS's Privacy Policy, which explains the purpose(s) for which imagery is recorded and retained and information about the disclosure policy in relation to that imagery.</p>
Governance	<p>Members of the Executive and OM Team who have been approved by the Chief Operations Officer are the only persons who will have the ability to access and retrieve CCTV imagery in line with the guidelines of the request and retrieval process.</p> <p>All families enrolled at a SCECS service that uses CCTV technology must sign a declaration on the Enrolment Form at the time of enrolment.</p> <p>A copy of the CCTV Collection Notice will be displayed in an area that is easily visible to visitors at the centre.</p>

5. Related documents

- Request & Retrieval of CCTV imagery Procedure
- CCTV Collection Notice

Version	Approved by	Date approved	Modifications
1	SCECS Management	October 2025	New policy