YMCA Geelong – YMCA Geelong Closed Circuit Television (CCTV) Surveillance Systems Policy

OFFICE USE ONLY

<table>
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<tr>
<th>Policy Number</th>
<th>Date Approved</th>
<th>Date Last Amended</th>
<th>Status</th>
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<tbody>
<tr>
<td>YG 194-O</td>
<td>04/07/2019</td>
<td>04/07/2019</td>
<td>APPROVED</td>
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1. YMCA Geelong Closed Circuit Television (CCTV) Surveillance Systems Policy

2. PURPOSE

2.1 The purpose of this policy is to provide direction and guidance for the use of closed circuit television (CCTV) surveillance systems for all YMCA Geelong facilities and managed properties or where YMCA Geelong is a partner with others in the installation of CCTV systems.

2.2 This policy provides guidance and direction for all YMCA personnel to ensure CCTV operations at YMCA Geelong facilities meet relevant legislative requirements and are conducted in accordance with Australian Standards AS 4806.1–2006–Closed circuit television (CCTV)–Part 1: Management and operation.

2.3 YMCA Geelong seeks to protect people and assets in and around YMCA Geelong facilities, YMCA Geelong managed facilities and YMCA Geelong property in the most effective manner possible including, and where necessary, through the appropriate application of closed circuit television (CCTV) surveillance systems.

2.4 The objective of this policy is to ensure that CCTV systems are installed and operated appropriately with due respect given to personal privacy and civil liberties.

3. SCOPE

This policy applies to all CCTV systems installed by YMCA Geelong in public places or where YMCA Geelong is a partner with others in the installation of CCTV systems in public places or where YMCA Geelong manages premises on behalf of other partners.

It applies to staff, volunteers, Board Members, contractors and other authorised personnel YMCA Geelong Inc.

4. POLICY

4.1 OBJECTIVE

4.1.1 The primary use of CCTV is as a tool to assist in the effective investigation and resolution of workplace incidents, gain learnings from incident management and ensure safeguarding of children and young people guidelines are implemented and other events at or in the immediate vicinity of YMCA Geelong facilities. Other applications and benefits of CCTV include but are not limited to:
4.1.2 discourage unlawful behaviour in and around facilities and property thereby enhancing the safety and security of all people and property
4.1.3 to provide an alternative means to monitor areas of risk in the workplace, particularly where hazardous or dangerous equipment, duties or other activity may be carried out, and
4.1.4 to enhance supervision of YMCA operations and assist in management of access controlled environments
4.1.5 Recorded CCTV images may be utilised for staff monitoring, training and development for YMCA Geelong staff.

4.2 COMPLIANCE WITH LEGISLATION & POLICY
4.2.1 Where CCTV is used to enhance supervision, appropriate systems of work are required to be developed through a risk assessment process in consultation with appropriate Health & Safety staff, and centre/program staff.
4.2.2 Where CCTV is installed and maintained by council partners in council owned facilities, centre management must ensure and have sign off that the council partner has read and acknowledges that the installed system, and the use of this system by council staff or their nominated 3rd party representatives, is in line with this policy. All operating manuals, system diagrams and appropriate training in its use must be provided to the nominated staff at the centre.
4.2.3 Centre/facility representatives will consult with the YMCA Geelong Risk team to determine the most appropriate and effective security option and to ensure that all legal, privacy and organisational issues including equipment, network compatibility, systems of work and suitable monitoring arrangements are handled in accordance with relevant YMCA Geelong policies and procedures.
4.2.4 Where CCTV is installed signage must be in place to alert persons that surveillance is in operation.
4.2.5 Installations of CCTV at YMCA Geelong facilities must only be carried out by appropriately licensed and suitably qualified technicians.

4.3 RESOURCES
4.3.1 Prior to selecting, installing, or major modification of any security CCTV equipment at a YMCA Geelong operated facility or premises, a risk assessment to determine the appropriate placement of the system must be undertaken ensuring integration of network technologies, and that the maximum security benefit is attained and balanced with privacy requirements.
4.3.2 Appropriate procedures shall be documented and applied to all security CCTV applications to ensure effective and ethical management of equipment and that the recorded information is appropriately maintained by authorised users. All security CCTV systems installed will comply with the following:
4.3.3 All CCTV controls and recorders must be located in a secure area.
4.3.4 Access to CCTV controllers and recorders shall be limited only to authorised user(s).
4.3.5 Where possible security CCTV equipment shall be integrated into the facilities wider electronic security network.

4.3.6 All CCTV equipment shall be maintained and serviced as indicated by manufacturers requirements and periodically checked to ensure all equipment is operating as required.

4.3.7 Staff whose employment could foreseeably involve operation and use of CCTV equipment or access to recorded footage shall undergo appropriate background checks in accordance with YMCA Geelong’s employment policies prior to operating or accessing the equipment.

Staff authorised to operate security CCTV equipment must undertake training and induction on the physical operation of the system and appropriate use of the system and recorded information.

4.4 COLLECTION

4.4.1 Viewing and monitoring of recorded CCTV images must only be carried out by authorised YMCA Geelong staff, as viewing, copying or the provision of YMCA Geelong recorded CCTV images/footage by or to others is prohibited except where permitted by law.

4.4.2 Incidents and events will be defined, categorised and handled according to YMCA Geelong’s Incident Reporting Procedure.

4.4.3 Sufficient storage capacity will be available in order to store CCTV images for a minimum period of 31 days in accordance with recommendations made in AS 4806.1-2006.

4.5 REQUESTS

4.5.1 Requests for access to digital footage recorded by the CCTV system will be assessed according to YMCA Geelong’s Customer Information Privacy Policy.

4.5.2 Members of the public or other stakeholders will be able to obtain information pertaining to the ownership, objectives and policy associated with the CCTV system by contacting YMCA Geelong.

4.6 DISCLOSURE

4.6.1 Disclosure of CCTV footage and records will be conducted according to YMCA Geelong’s Privacy Policy and used for internal purposes and may be used in as evidence of investigation with external authorities ie: Worksafe/ Victoria Police etc.

4.7 RELATIONSHIP WITH VICTORIA POLICE

4.7.1 Upon authorisation from the relevant CEO/ Manager CCTV images and digital footage may be released to Victoria Police upon formal request and for official purposes, or where otherwise required by law.

4.8 DATA SECURITY

4.8.1 Any information retrieved from CCTV cameras must be stored in a secure environment. Recorded images, videotapes and digital files remain the property of YMCA Geelong and are subject to the provisions of the Surveillance Devices Act 1999 No. 21 of 1999 incorporating amendments as at 27 May 2010 (Victoria) and the Privacy Act.
4.9 RECORDS

4.9.1 The relevant facility/centre manager will compile and maintain a local register of all CCTV systems installed at their facility. The register will contain:
- a listing of authorised users and persons authorised to monitor CCTV.
- the date and content of training provided to authorized users of the CCTV system
- a schematic diagram of the CCTV system
- system configuration settings
- records of all maintenance activity carried out on the system, including the relevant technician’s details, activity undertaken and date of works

4.9.2 All incidents, requests and disclosures pertaining to CCTV footage by an external party shall be logged electronically on the YMCA’s incident logging system.

4.10 ACCOUNTABILITY, AUDIT AND EVALUATION

4.10.1 Formal complaints will be handled in accordance with the relevant YMCA Geelong policies.

4.10.2 Annual review of the CCTV shall be conducted to establish the following:
- The CCTV system, policy and procedures continue to fulfill the primary objectives as outlined in section 3.1 of this document
- Whether the CCTV system, policy and procedures continue to align with related data protection standards and legal requirements.

5. DEFINITIONS

Authorised User: A person authorised by the Centre/facility manager (or their delegate) who has successfully completed appropriate security CCTV equipment training, background checks and is conversant with this policy and applicable legislation.

Closed Circuit Television (CCTV) System: Any combination of cameras, lenses, video/digital recorders and/or accessories installed for the purpose of monitoring and/or recording visual activity.
6. ROLES AND RESPONSIBILITIES

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<tr>
<th>Department/Area</th>
<th>Role/Responsibility</th>
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<tbody>
<tr>
<td>CEO/Health and Safety Advisor</td>
<td>responsible for the monitoring and review of the policy requirements and implementation.</td>
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<tr>
<td>Management- SMT</td>
<td>Responsible for ensuring application and compliance to the policy requirements.</td>
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<tr>
<td>Facility management and staff</td>
<td>Centre managers will compile and maintain a local register of all CCTV systems installed on their facility. The register will contain a listing of authorised users. Centre managers will ensure there is no unauthorised release of CCTV footage without prior approval.</td>
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<tr>
<td>People and Culture and Centre Managers</td>
<td>Ensure all staff and volunteers are inducted and are aware of the CCTV policy.- Update Induction Checklist</td>
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7. MONITORING, EVALUATION AND REVIEW

The ongoing monitoring and evaluation of this policy will be overseen by the Health and Safety Advisor and conducted in line with the policies and procedures framework on a three-year cycle.

8. SUPPORTING DOCUMENTS (LINKS TO PROCEDURES, LEGISLATION, FORMS, WORK PRACTICES)

- Surveillance Devices Act 1999
- Privacy and Data Protection Act 2014
- Public Records Acts 1973
- Private Security Act 2004
- Charter of Human Rights and Responsibilities Act 2006
- Freedom of Information Act 1992
- Evidence Act 2008
- Occupational Health & Safety Act 2004
- AS 4806.1–2006–Closed circuit television (CCTV)

9. DOCUMENT HISTORY

Approved by: SMT
Meeting date: 04/07/2019
Resolution Number:
Effective date: 08/07/2019
Review date: 02/07/2019
Policy Owner: Christine Mawson, Health and Safety Advisor
Contact Details policy owner: Email: geelong@ymca.org.au; Ph: 5221 8344

Amendment history:

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<tr>
<td>V1</td>
<td>6/06/2013</td>
<td>Shona Eland</td>
<td>Initial draft</td>
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<tr>
<td>V2</td>
<td>30/06/2016</td>
<td>Shona Eland</td>
<td>Review with Newtown Centre Manager on installation of CCTV - Newtown</td>
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<tr>
<td>V3</td>
<td>02/07/2019</td>
<td>Shona Eland</td>
<td>Significant review of document through assist with updating sometimes complex legislative requirements.</td>
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<tr>
<td>V4</td>
<td>04/07/2019</td>
<td>Christine Mawson</td>
<td>Added to clause 6. Roles and responsibilities -</td>
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<td>“People and Culture and Centre Managers - Ensure all staff and volunteers are inducted and are aware of the CCTV policy.”</td>
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<td>Added to clauses 4.1.1 ”gain learnings from incident management and ensure safeguarding of children and young people guidelines are implemented and”</td>
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<td>Added to Clause 4.6.1 Disclosures- ”and used of internal purposes and may be used in as evidence of investigation with external authorities ie: Worksafe/ Victoria Police etc.”</td>
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As adopted by the YMCA Geelong on 04/07/2019

Chief Executive Officer YMCA Geelong Inc.