

# Use of Closed-Circuit Television (CCTV) on Residential Premises - Policy

## 1. Purpose

This policy explains how HOME in PLACE will operate CCTV in high density residential properties owned and/or managed by HOME in PLACE.

## 2. Scope

The policy applies to HOME in PLACE properties where CCTV is installed and activated. The policy does not apply to CCTV installed by tenants or other parties.

## 3. Policy Statement

HOME in PLACE is committed to providing housing and housing services to a high degree. HOME in PLACE may use CCTV within the buildings it owns and manages for the following purposes:

- Assist Police in reducing crime and/or antisocial behaviour;
- Assist HOME in PLACE to identify person(s) responsible for damage or other illegal activity in common areas;
- Improve safety and wellbeing of tenants

HOME in PLACE will comply with all legislative requirements when installing and operating CCTV including:

- Prior to installation obtain consent from the property owner if required;
- Ensure CCTV cameras are clearly visible to people in the area under surveillance
- Installing signage advising people that they may be under surveillance

### *Protection of Privacy*

HOME in PLACE is committed to ensuring the privacy of individuals are protected. HOME in PLACE acknowledges its obligations to manage its CCTV systems in accordance with the requirements of relevant Commonwealth and State legislation.

Access to CCTV footage will be limited to relevant staff only who will abide by HOME in PLACE's Code of Conduct and Privacy Policy in managing the CCTV footage.

HOME in PLACE will have signage in areas monitored by CCTV that advises:

- Cameras are in operations and footage is recorded 24/7
- HOME in PLACE as the owner of the CCTV system
- A contact number for enquiries relating to the CCTV camera

### *Release and retention of CCTV footage*

Any request for footage must be in writing and through HOME in PLACE's Group Chief Legal Officer who will retain a record of the request. HOME in PLACE will not release CCTV footage to media or other members of the public.

HOME in PLACE will, on request, provide CCTV footage to law enforcement agencies to assist with relevant criminal investigations. Any use of disclosure of personal information within CCTV footage will be made in accordance with HOME in PLACE's Privacy Policy.

CCTV records will be stored securely and may be stored for up to 30 days after which time they may be destroyed. Where an incident has occurred at a property, relevant records will be retained until resolution of the incident or indefinitely depending on the circumstances relating to the incident.

### *Review of Decisions*

If a tenant is dissatisfied with a decision made by HOME in PLACE, they should first discuss this with a Tenancy Relations Officer. If the tenant is still dissatisfied, they may seek a review of the decision or lodge an application with the NSW Civil & Administrative Tribunal (NCAT) or Queensland Civil & Administrative Tribunal (QCAT).

## 4. Responsibilities

All HOME in PLACE workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of HOME in PLACE policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to HOME in PLACE clients,
- inform HOME in PLACE's clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of HOME in PLACE's policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about HOME in PLACE Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved HOME in PLACE's Policy and Procedures to be reported and managed.

## 5. Implementation and Review

This policy is listed on HOME in PLACE's Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside HOME in PLACE without approval. The policy is reviewed regularly and published on HOME in PLACE's SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

HOME in PLACE complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services ([GESAdmin@homeinplace.org](mailto:GESAdmin@homeinplace.org)) to maintain and update the HOME in PLACE's Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

HOME in PLACE Workers should refer to [SharePoint Company Documents Policy and Procedure site](#) for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

## 6. Resources and related documents

### *Related documents*

- Privacy Policy

### *Related legislation/standards*

- The Privacy Act 1988 (Cth)
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)
- Australian Privacy Principles

### State based legislation

- Privacy and Personal Information Protection Act 1998 (NSW)
- Workplace Surveillance Act 2005 (NSW)
- Freedom of Information Act 1989 (NSW)
- Information Privacy Act 2009 (QLD)
- Freedom of Information Act 1989 (QLD)
- Right to Information Act 2009 (QLD)

## 7. Definitions

Please refer to HOME in PLACE Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
<b>Appeals</b>	A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’ An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;
<b>Compass</b>	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)) and as a charity with the <a href="#">Australian Charities and Not-for-profit Commission (ACNC)</a> .
<b>Complainant</b>	Person with a Complaint ongoing with HOME in PLACE.
<b>Complaints</b>	An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service. Types of Complaint include: • Where HOME in PLACE have failed to provide or there has been a delay or problem in providing a service; • Where HOME in PLACE have failed to follow or have been unfair or inconsistent in applying our policies or procedures. • Where HOME in PLACE have failed to keep Tenants informed, through lack of or insufficient information • Where there has been inappropriate behaviour or attitude from a HOME in PLACE Employee or contractor.
<b>Director</b>	Has the same meaning as defined in the <a href="#">Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary</a> in Australia and as defined in the <a href="#">Companies Act 1992 Part 1 Section 2 Interpretation</a> .
<b>Employee</b>	A person engaged under an employment agreement or award by any company in the HOME in PLACE Group.
<b>Executive Manager</b>	Many positions within HOME in PLACE include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document HOME in PLACE Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
<b>HOME in PLACE</b>	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)). This includes Compass Housing Services Co (Queensland) Ltd Trading as HOME in PLACE and Compass Housing Services Co (Victoria) Ltd Trading as HOME in PLACE both of which are a wholly owned subsidiary of Compass registered in Australia.
<b>HOME in PLACE (New Zealand)</b>	HOME IN PLACE (NEW ZEALAND) LIMITED (formerly Compass Housing Services (NZ) Co Ltd) is registered in New Zealand under the Companies Act and as a charity registered with Charities NZ under the Charities Act

Term	Definition
<b>HOME in PLACE Group</b>	The corporate structure that includes HOME in PLACE (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
<b>Independent contractor</b>	means a party engaged directly by HOME in PLACE pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies, or partnerships with whom HOME in PLACE enters into an agreement for the provision of specified individuals to supply specific skills, services, or consultancy arrangements. It does not include individuals engaged through labour hire agencies. Independent contractors are not employees of HOME in PLACE.
<b>Officer</b>	Has the same meaning as defined in the <a href="#">Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary</a> in Australia and as defined in the <a href="#">Companies Act 1992 Part 1 Section 2 Interpretation</a> in New Zealand
<b>Parent Board</b>	The current directors of HOME in PLACE.
<b>Parent Company</b>	HOME in PLACE
<b>Stakeholder</b>	person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity, may also be called 'interested party'.
<b>Subsidiary Boards</b>	The appointed board of directors of a Subsidiary Company.
<b>Subsidiary Company</b>	A company in which HOME in PLACE owns all or at least a majority of the shares.
<b>User</b>	any person or entity that use HOME in PLACE Information or ICT Assets.
<b>Worker (HOME in PLACE)</b>	has the same meaning as defined in the <a href="#">NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of 'worker' (1)</a> A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: <ul style="list-style-type: none"> <li>• an employee, or</li> <li>• an independent contractor or subcontractor, or</li> <li>• an employee of a contractor or subcontractor, or</li> <li>• an employee of a labour hire company who has been assigned to work in the person's business or undertaking, or</li> <li>• an outworker, or</li> <li>• an apprentice or trainee, or</li> <li>• a student gaining work experience, or</li> <li>• a volunteer, or</li> <li>• a person of a prescribed class.</li> </ul>
<b>Worker (HOME in PLACE QLD)</b>	is 'a person who works under a contract and, in relation to the work, is an employee for the purpose of assessment for PAYG withholding under the Taxation Administration Act 1953 (Cwlth), schedule 1, part 2-5'. This applies to a person for whom PAYG tax instalments are required or would be required to be withheld by their employer.
<b>Worker (HOME in PLACE VIC)</b>	A worker is defined as an individual: <ul style="list-style-type: none"> <li>• who <ul style="list-style-type: none"> <li>— performs work for an employer or</li> <li>— agrees with an employer to perform work</li> </ul> </li> <li>• at the employer's direction, instruction or request, whether under a contract of employment (whether express, implied, oral or in writing) or otherwise or</li> <li>• who is deemed to be a worker by the legislation.</li> </ul>

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