

Use & Management of Closed-Circuit Television (CCTV) Policy

1. Purpose

The purpose of this policy is to ensure the effective, secure, and compliant management of Closed-Circuit Television (CCTV) systems located in branch and residential sites owned and/or managed by HOME in PLACE.

This policy establishes requirements for:

- The management and storage of CCTV system information;
- Controlled access to CCTV footage;
- Appropriate handling of internal and external access requests; and
- Protection of staff wellbeing and privacy.

2. Scope

This policy applies to all CCTV systems installed at properties owned and/or managed by HOME in PLACE, as well as to all employees, contractors, and representatives involved in the management, operation, or access of CCTV.

The policy applies to all workers, directors, and members of HOME in PLACE decision-making committees and advisory bodies. The policy applies to third parties engaged to carry out activities on behalf of HOME in PLACE if stipulated by agreements. It also applies to all external parties requesting access to CCTV footage, including NSW Police and other authorised authorities.

This policy does not apply to CCTV installed by tenants or other authorised parties.

3. Policy Statement

Principles

HOME in PLACE is committed to the responsible use of CCTV systems to enhance safety and security across its properties, while ensuring full compliance with applicable privacy, legal, and ethical obligations. CCTV systems and footage will be managed in a consistent, transparent, and controlled manner, with access strictly limited to authorised personnel and only for legitimate business purposes.

HOME in PLACE may use CCTV within the properties it owns or manages for the following purposes:

- Assist HOME in PLACE to manage antisocial behaviour, or to identify person(s) responsible for damage or other illegal activity on its sites;

- Assist Police in responding to crime and/or antisocial behaviour; and
- Improve the safety and wellbeing of tenants, staff and contractors.

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; and
- Installing signage advising people that they may be under surveillance.

In applying this Policy, HOME in PLACE maintains that CCTV is used solely for safety, security, and incident investigation functions. Access to footage is restricted to authorised individuals, and privacy and confidentiality are always upheld.

HOME in PLACE is also committed to minimising staff exposure to distressing material by limiting access to sensitive footage to appropriate personnel. All access, use, and release of CCTV footage must be appropriately documented to ensure accountability and auditability.

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.

CCTV footage is classified as confidential information and must be handled in strict accordance with applicable privacy obligations. All collection, use, storage, and disclosure of CCTV footage must comply with the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs), as well as any relevant state legislation.

Staff must not access CCTV footage without appropriate authorisation, share footage outside approved processes, or use footage for any purpose unrelated to legitimate organisational business. HOME in PLACE requires that all handling of CCTV footage is undertaken lawfully, securely, and only for authorised purposes, always ensuring the protection of individuals' personal information and privacy rights, and in accordance with organisational policies and procedures.

Access, Release and Retention of CCTV Footage

To protect staff wellbeing and uphold privacy obligations, HOME in PLACE requires that viewing of potentially distressing CCTV footage is limited to authorised senior staff only. Frontline or junior staff must not be required to view material that may be distressing in nature. Managers are responsible for assessing the content and context of footage prior to approving access and must ensure that appropriate supports are in place for any staff required to view such material.

Access to CCTV footage is restricted to authorised personnel only. Any access, extraction, or release of footage must be approved by a manager, appropriately documented, and conducted using secure transfer methods. Where CCTV footage is extracted or released in relation to incidents involving antisocial or

criminal behaviour, a secure copy must be retained within a restricted-access file to support potential future requirements, including tribunal proceedings, police investigations, or legal matters.

Internal Requests

Staff seeking access to CCTV footage must submit a request to the relevant branch manager. The request must include:

- Site or location;
- Date & relevant time or period of time required; and
- Reason for the request.

External Requests

All external requests for access to CCTV footage must be submitted in writing and directed to the relevant branch manager. Requests from Police must also be in writing, and contain a clear reference to an incident, a date and time period. Requests from Police may be accompanied by formal legal instruments – such as subpoenas or warrants. Warrants and Subpoenas must be lodged as a Folio (Business Incident) and responded to in the specified timeframe.

HOME in PLACE will not release CCTV footage to tenants, support services or members of the public.

The manager is responsible for verifying the legitimacy of a request prior to releasing the footage.

Management and Maintenance of CCTV System Information

All on-site CCTV system information must be maintained in the central register within Folio and reviewed annually. Any new systems installed must be added to the register within 30 days of activation. The register is owned by the office of the Group Chief Operating Officer and maintained collaboratively with the Operations Australia leadership team.

The register includes the following information:

- Site Address;
- System type, and provider;
- Supplier, monitoring and maintenance contact details;
- Camera locations and coverage details (CCTV);
- Storage method (i.e. cloud, local);
- Recording retention period;
- Authorised HOME in PLACE point of contact (POC) (Main and Secondary) for each site; and
- Relevant security PINs or access codes.

The register must be reviewed annually by the relevant site manager, and any updates must be recorded promptly.

Any changes to the site contacts, PINs or security access codes must be updated within seven (7) days of the change occurring. The relevant site manager is responsible for providing updated details to the office of the Group Chief Operating Officer to facilitate the required changes to the register.

4. Definitions and Acronyms Glossary

For clarification of any definitions or acronyms contained within this document, please click on the [Glossary](#) for information.

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