



Leadership, Service Management and Effective Administration



Closed Circuit Television (CCTV) Requirement | NQS7

Purpose

This requirement applies to Goodstart centres and Centre Support Offices where CCTV technology is installed. Goodstart Early Learning operates Closed Circuit Television (CCTV) Systems in various internal and external locations in some Goodstart early learning centres and Centre Support Offices. The aim of this requirement is to clearly outline the purpose of, use of, and access to CCTV recordings by Goodstart. Goodstart adheres to all relevant laws, including but not limited to, the Privacy Act 1988 and complies with the Australian Privacy Principles.

Goodstart 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. Goodstart 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.

Situation	Guidance
Installation and Maintenance	□ Goodstart is responsible for ensuring that CCTV installation and use are compliant with relevant laws and regulations. □ Goodstart and the Nominated Supervisor for the relevant centre will ensure that: ○ Goodstart Centre Support Office engages the services of qualified, licensed, and reputable third-party contractors to install its CCTV systems who meet the Goodstart 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. □ Goodstart and the Nominated Supervisor for the relevant centre will ensure that reasonable steps are taken to notify those entering and using the Goodstart premises of the use of CCTV, this includes: ○ Access to the Goodstart CCTV policy and collection notice upon child enrolment and checking in of visitors. ○ Notifying employees in writing at least 14 days before the CCTV system commences recording. Erecting clearly visible signage at the entrance of the building to notify staff, families, and visitors about CCTV surveillance
Location of Cameras for Use	□ Goodstart 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

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	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: ○ Carpark and exterior of the building ○ Entry and reception areas ○ Hallways ○ Kitchens ○ Learning spaces ○ Outdoor play spaces; and ○ Sleep spaces □ Cameras will not be placed in any of the following locations: ○ Adult Toilets, bathrooms, showers and locker rooms ○ Children's nappy change and bathrooms ○ Parent's Room ○ Centre Director's Office ○ Staff rooms □ The CCTV systems that Goodstart use do not record sound. □ 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. □ Goodstart 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). Goodstart also reserves the right to remove any one or more cameras at any Goodstart premises at its discretion.
Monitoring	□ Goodstart 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, Goodstart 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, Goodstart would only need to retain imagery for a short period of time because incidents will come to light very quickly. □ 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 immediate potential or actual harm.
Storage of Imagery	□ The imagery recording systems that Goodstart uses as part of its CCTV system are protected against unauthorised access or vandalism. □ The CCTV monitoring devices will be located in secure locations where they are unlikely to suffer from criminal attacks or unauthorised access. Computers able to access imagery are password protected and part of a secure network. All data will be encrypted during transit and storage. □ Access is only provided to authorised members of the Safety, Health and Wellbeing (SHW) and Safeguarding Teams at Goodstart. Access may also be granted to Goodstart other centre support

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	teams, third party consultants who assist Goodstart in operating its business (including legal advisors and technology service providers), and child protection agencies or family support agencies when we reasonably believe that a child is at risk of significant harm, as required by Goodstart's Protecting Children from Abuse, Neglect and / or Harm Procedure or Goodstart's Investigation Procedures.
Use of Imagery	□ 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. □ The Centre Director and SHW 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. □ Goodstart may use CCTV for the purposes provided in this policy, including relying on CCTV recordings to investigate alleged breaches of Goodstart 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 Goodstart policies and the principles of natural justice and procedural fairness. □ Where an incident has occurred or an allegation is made, a Goodstart authorised member of the SHW 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 SHW 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 safety of Goodstarters, 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 Safety, Health and Wellbeing 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 Goodstart SHW team for consideration. Goodstart 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 Goodstart staff member, family or visitor of the centre or anyone else will only be granted when: ○ It is requested in writing, and if required approved by the Goodstart Legal team in advance.

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	○ 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 or Territory government departments and regulatory bodies which are concerned with the welfare of children or other children's services). □ Individuals have a right of access to their Personal Information in accordance with Australian privacy laws and Goodstart's Privacy Policy. All Individual access requests are to be processed by the SHW Team. Individuals requesting access to their Personal Information are to be provided with a copy of this Policy and Goodstart's Privacy Policy, which explains the purpose(s) for which imagery is recorded and retained and information about the disclosure policy in relation to those imagery.
Governance	□ Members of the SHW & Safeguarding Team who have been approved by the Chief Safety 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. □ A copy of the CCTV Collection Notice will be displayed in an area that is easily visible to visitors at the centre.

Responsibilities

This requirement applies to Goodstart centres and Centre Support Offices where CCTV technology is installed.

This requirement is to be implemented by: All Goodstart Staff

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Closed Circuit Television (CCTV) – Request and Retrieval of CCTV Imagery Procedure | NQS7

Purpose

The purpose of this procedure is to outline the request and retrieval process for access to CCTV imagery for all parties outside of the Safety Health and Wellbeing team.

For authorised SHW Team members:

Authorised members of the SHW team will have immediate access to video footage at all times in the event of an incident or allegation that requires quick analysis and action. The video footage system will maintain login records and an audit trail of all access for verification if required later.

Where anyone outside of the SHW Team requires access to or a copy of video footage, the below procedure must be followed.

Step	Task	Process to be undertaken
1	Requestor to complete a request to view imagery	Requestor (e.g. Family, Staff member, other CSO teams, external agency): ☐ Submits a CCTV Request via the online form to Safety Health and Wellbeing Team (SHW). The request form is located on the CCTV intranet site. ☐ This form may be completed by Goodstart on behalf of an external agency or as part of an incident investigation, information sharing request or investigation of an allegation of child abuse, neglect or harm. ☐ If the requestor is a family or staff member, the Centre Director must complete the form in consultation with the requestor at the Centre. In the absence of the Centre Director, the Nominated Supervisor must complete this process.
2	Request is reviewed	SHW Team receive and review the request: ☐ The request is received by the SHW Team and after initial review of the information to ensure a previous request for the same imagery has not already been received, the team will then confirm if the reason for the request meets the following requirements: - o Security of the building and/or property - o Allegation of child abuse, neglect, and/or harm - o Request for individual's personal information (unless there are any court orders in place prohibiting the sharing of personal information or situations where sharing personal information could cause harm) - o Workplace, health and safety investigation - o Request from law enforcement agency, or other information sharing entity - o Subpoena or Court order - o Workers Compensation claim determination ☐ Consideration as to how quickly the footage must be retrieved will also be given at this step, in relation to the remaining time the footage will be available based on the 30-day rolling footage retention functionality. ☐ The SHW team will then update the requestor. Note - If the request meets the requirement to retrieve imagery, go to STEP 5. If the request does not meet the requirement to retrieve imagery, go to STEP 3.

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3	The request needs further investigation to determine if imagery is to be retrieved	SHW Team: ☐ Determine whether the request needs to be escalated. ☐ If the request does not meet the requirements set out in Step 2, and the SHW Team consider the request should be reviewed further then: - o The SHW Team may send the request to the Legal Team for review - o If the Legal Team advise the request is not valid and lawful, written advice will be provided back to the SHW team. ☐ The SHW Team will then update the rerequestorr with the decision. Note - If the request meets the requirement to issue imagery, go to STEP 5. If the request does not meet the requirement to issue imagery, go to STEP 4
4	Request for retrieval is denied	The SHW Team inform the Requestor that the request has been denied: ☐ The SHW Team will inform the Requestor via email of the decision to deny access to the imagery and the reason/s for the decision. In the case that the requestor is a parent or staff member, the Centre Director or State Performance Lead who completed the request on behalf of the requestor, must communicate the decision to the requestor via email. ☐ Reasons may include: - o The organisation believes that giving access may endanger the life, health or safety of any individual, or endanger public health or safety; - o Giving access would have an unreasonable impact on the privacy of other individuals; - o The request is frivolous or vexatious; or - o The information is part of existing or anticipated legal proceedings between the requester and the organisation. ☐ A copy of the requested imagery is saved for 30 calendar days after the denial of the request for the complaint process to be closed out, after which the imagery is then destroyed. ☐ A log of the request is maintained (see Step 6) as well as a log of the destroyed imagery. ☐ The requestor can follow the complaint process as outlined in Goodstart's privacy statement.
5	Retrieval of the imagery is completed	The SHW Team retrieve the imagery: ☐ The SHW Team then review the imagery. ☐ A view only link to the relevant snippet of footage will then be shared: - o With the Centre Director (if the requestor was a staff member or family member) for then viewing with the Requestor. - o Directly if the requestor was from a Law Enforcement Agency - o Directly if the requestor is a CSO team. ☐ Imagery to be viewed will have privacy blocks used as necessary to de-identify, blur and/or redact personal information of anyone else in view in the imagery (unless written consent has been provided to us by such persons to use and disclose their personal information for the purpose of the requested retrieval). See below for an example.

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		 □ A copy of the imagery is also stored separately and retained as per Goodstart guidelines as outlined in BM9 Retention and Destruction Schedule - Centre Support Offices Records.
6	Update the Request Log	The SHW Team: □ Update the internal request log.

Responsibilities

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CCTV Imagery Collection Notice

CCTV cameras are located on the interior and exterior of the premises and are used by Goodstart Early Learning Ltd (**Goodstart**) for 24-hour video surveillance of its premises and property.

You (and your child) may be video recorded at times by these cameras when approaching or exiting the premises and whilst attending the premises. Personal information (including sensitive information) may be collected through the operation of these cameras, for example, if you (and/or your child) are reasonably identifiable from the images captured.

CCTV cameras are not installed in private areas such as parent's rooms, bathrooms and staff rooms. The camera's do not record sound.

The personal information which we collect on CCTV will only be used for the purposes of:

- Assisting in the overall safety, security, and safeguarding of individuals, premises, and equipment.
- Facilitate 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.
- Act as an effective deterrent against criminal activity, such as vandalism

Recorded imageries are retained and used only in accordance with the purpose for which the CCTV system was installed, or a reasonably expected related purpose. Goodstart will not use or disclose imagery to a third party for any other purpose otherwise than in accordance with the provisions of this policy without consent unless it is authorised or required by law.

Goodstart adheres to all relevant laws including but not limited to the Privacy Act 1988 and complies with the Australian Privacy Principles.

All CCTV recordings are made and held by Goodstart in compliance with its CCTV and Privacy Policies and all relevant legislation. The images captured by the CCTV cameras are only accessible by authorised Goodstart employees.

We will not disclose your personal information to a third party unless you consent, or as otherwise provided in our CCTV and Privacy Policies, or we are required or authorised by law to do so.

Goodstart's Privacy Policy found at www.goodstart.org.au/privacy-policy explains how you may access or seek correction of your personal information and how we will deal with privacy complaints.

If you do not wish for your personal information to be collected, you should discuss this with a Goodstart employee. Goodstart employees will act strictly in accordance with the Privacy Policy and will be happy to discuss the reasons for collecting the personal information. They will also discuss with you any consequences of not providing your personal information.

We take your privacy very seriously. If you have any questions about how your personal information will be managed, please contact privacy@goodstart.org.au

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RECORD MANAGEMENT SCHEDULE		NA				
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