

Closed Circuit Television (CCTV) Policy

Quality Areas: NQS 2 – Safety, NQS 7 – Governance

Policy Owner: Safety and Compliance

Why this is
important

1. Introduction and Purpose

The purpose of this policy is to outline the lawful, ethical, and appropriate use of Closed-Circuit Television (CCTV) systems across Guardian Centres. This policy supports our commitment to child safety, staff wellbeing, property protection, and privacy compliance in accordance with relevant Australian legislation

2. Who does this policy apply to:

This policy applies to all Guardian Centres, employees, contractors, visitors, families, and any other person who enters Guardian premises where CCTV is installed.

3. What is our policy

3.1 Policy Statement

Guardian uses CCTV systems to:

- Support child safety and wellbeing
- Prevent and investigate incidents
- Promote a safe working environment
- Safeguard Guardian property and assets
- Comply with legal and regulatory requirements

All use of CCTV will be proportionate, respectful of privacy, and consistent with this policy.

3.2 Installation and Camera Placement

- CCTV installation or modification requires prior approval and must be completed by licensed professionals.
- CCTV cameras will always be clearly visible and installed in appropriate areas only.
- CCTV will not be installed in the following locations:
 - Toilets (adult or child), nappy change areas, bathrooms
 - Dedicated breastfeeding rooms
 - Prayer spaces

Permitted CCTV locations include (but are not limited to):

- Entrances, exits and car parks
- Foyers, reception areas, and hallways

- Indoor/outdoor play spaces, perimeters and sleep areas
- Kitchens and document storage rooms

3.3 Signage

Centres with CCTV must display signage that:

- Informs all individuals entering the premises of CCTV use
- Is clearly visible at:
 - Main entry points to the centre
 - Entry to all rooms or areas under surveillance

3.4. Recording and playback equipment

All recording and playback equipment will be properly secured.

3.5 Permitted Use

CCTV footage may only be used for legitimate purposes, such as:

- Supervising children and adults to ensure safety
- Preventing, identifying or investigating incidents, complaints, allegations, disputes or misconduct
- Supporting training and incident debriefing
- Collaborating with regulatory or law enforcement authorities

CCTV will not be used for targeted performance monitoring or surveillance of team members.

3.6 Live Monitoring

Live CCTV feeds may be accessed by Centre Team Members only to:

- Maintain visibility of children during care
- Respond to emergency events or alarms
- Assess security risks

3.7 Audio and Facial Recognition

- CCTV systems must not record audio.
- Cameras with facial recognition or biometric tracking features will not be used.
- Exceptions apply only to portable baby monitors in cot rooms.

3.8 Storage and Retention

- CCTV footage is to be stored securely and must only be saved to company issued devices. Where practical,

CCTV footage should not be stored on physical media such as tapes, DVDs or USBs.

- CCTV systems will be configured to retain footage for no longer than is reasonably necessary. After this period, footage will be automatically deleted, unless that footage is required to be retained in connection with an incident, complaint or investigation.

3.9 Team Members

- Team members will not be provided access to any footage unless approved by Guardian and the nature any sharing of footage will be at Guardian's sole discretion.

3.10 Families

- Families will not be provided access to any footage unless legally requested.

3.11 Regulators and Law Enforcement

- Regulatory Authorities and Police must submit written requests to compliance@guardian.edu.au
- Footage will be released if legally required or necessary for investigation and safety.

3.12 Court Orders

Court Orders, warrants, or subpoenas must be forwarded immediately to compliance@guardian.edu.au

3.13 CCTV Access Log

Compliance Team must maintain a central CCTV Access Log documenting:

- When footage was accessed
- Who accessed it
- Why it was accessed
- Any further distribution (e.g. to authorities)

3.14 Shared Premises

Where centres operate within shared facilities, CCTV may be in place that is controlled by a shared tenant or building management group. This CCTV may monitor the perimeter of the Centre including entrances and exits and in some limited cases may capture aspects of the external play spaces.

4. Responsibilities

4.1 Approved Provider will:

1. Ensure that CCTV policies and procedures meet legal and policy compliance
2. Approve all installations or modifications to CCTV in accordance with our *Design Guidelines*
3. Oversee access, control and data protection
4. Support centres to implement CCTV legislative requirements

4.2 Centre Manager / Nominated Supervisor (NS) will:

1. Operate CCTV systems in line with this policy
2. Ensure that visible signage is displayed at the entrance of the centre and at the entrance of each room in accordance with this policy
3. Maintain an accurate access log (if required) that is available is completed when accessing and that CCTV is securely stored
4. Ensure that any requests for access are managed in accordance with this policy
5. Where the Service Approvals outlines that CCTV needs to be maintained, they must escalate where a TV screen is not working to our facilities help desk

4.3 Team Members will:

1. Report any issues or faults related to CCTV to their Centre Manager
2. Complete relevant training if required

4.4 Families will:

1. Refer to this policy for information about storage, retrieval and access of CCTV at their centre

5. Tools and Resources

The most important documents I need are:	Other supporting documents will include:
Signage Template	Privacy Policy

8. Sources

Education and Care Services National Law Act 2010

Education and Care Services National Regulations 2011

Privacy Act 1988 (Cth)

Surveillance Devices Act 1999 (VIC)

Workplace Surveillance Act 2005 (NSW)

Workplace Privacy Act 2011 (ACT)

Surveillance Devices Act 2016 (SA)

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