

CCTV Monitoring and Smart Video Doorbells

Yarriambiack Shire Council encourages a working environment which promotes gender equality and models non-violent and respectful relationships.

1 Purpose

This policy will provide guidelines for procedures to be implemented at Yarriambiack Shire Council to ensure:

- The safety and security of Yarriambiack Shire Council Services and equipment through limited, controlled use of CCTV systems, and smart devices.
- To establish a clear, lawful, and ethical framework for the use of Closed-Circuit Television (CCTV) at Yarriambiack Shire Council.
- Ensures that any implementation of surveillance supports the safety, wellbeing, and security of children, educators, families, and visitors while upholding the fundamental rights to dignity, privacy, and respectful care.
- Compliance with relevant privacy legislation, the National Model Code, and regulatory requirements.
- The responsible and ethical management of CCTV footage, with strict access controls and time-limited storage.
- The responsible and ethical management of Smart Video Doorbell systems with strict access controls with no ability for recording. (These systems can be viewed only in real time).
- Transparency for families, staff, and visitors regarding where and when surveillance occurs.
- The protection of children's and families' rights by ensuring CCTV or smart devices are not used for monitoring or recording during operating hours or in internal service areas.
- Acting as a deterrent, prevention and notification against criminal activity such as persons accessing yard, breaking in, theft and vandalism.

2 Policy Statement and Scope

Yarriambiack Shire Council is committed to:

- Providing secure premises without compromising the dignity or privacy of children, families, staff or visitors.
- Families and staff being informed about the use, purpose, and access arrangements for CCTV.
- The use of surveillance being lawful, proportionate, and transparent, and is guided by child safe principles, applicable privacy laws, and the Education and Care Services National Law and Regulations.
- Using CCTV and Smart Video Doorbell Systems only for legitimate security purposes, in accordance with legislation and community expectations.
- Limiting access to recorded images, complying with the Australian Privacy Principles and destroying data when no longer required.
- Complying with all relevant legal obligations, including the Privacy Act 1988 (Cth), Australian Privacy Principles, Surveillance Devices Act 1999 (Vic) or applicable state legislation, and the Education and Care Services National Law and Regulations.

This policy applies to the approved provider, persons with management or control, nominated supervisor, persons in day-to-day charge, early childhood teachers, educators, staff, students, volunteers, parents/guardians, children, and others attending

the programs and activities of Yarriambiack Shire Council, including during offsite excursions and activities.

3 Responsibilities

RESPONSIBILITIES	Approved provider and persons with management or control	Nominated supervisor and persons in day-to-day charge	Early childhood teacher, educators and all other staff	Parents/guardians	Contractors, volunteers and students
R indicates legislation requirement, and should not be deleted					
Ensuring that all staff and volunteers are provided with a copy of this policy and have a clear understanding of the procedures and practices outlined within	R	✓	✓		✓
Ensure obligations under the Education and Care Services National Law and National Regulations are met	R	✓	✓		
Ensure obligations under the National Model Code are met	R	✓	✓		✓
Ensure CCTV use complies with surveillance and privacy laws.					
Promote a culture of child safety and wellbeing that underpins all aspects of the services operations (including all ways personal information gathered) to reduce risk to children (including the risk of abuse)	✓	✓			
Ensure installation and use of CCTV Monitoring and smart devices complies with this policy, relevant laws and the National Model Code	✓				
Yarriambiack Shire Council ensures services with CCTV systems have been installed by qualified, licensed and reputable third-party contractors. These third party contractors have been employed by local Shires or Yarriambiack Shire Council. Yarriambiack Shire Council follows all procedure set out in our policies in regard to Contractors access our services. <i>(See Participation of Volunteers, Students and Contractors Policy)</i>	✓				
Display clear signage at all camera-monitored entry and exit points at the service.	✓	✓			
Ensure Smart Video Doorbell devices function via either two methods. 1) When doorbell is activated the person pushing button can leave a message which is sent to a Yarriambiack Shire Council phone. 2) When doorbell is activated the video is seen on a monitor inside service. The video displayed on monitors	✓	✓	✓		

is in real time and is not recorded or stored by Yarriambiack Shire Council.					
Ensure only approved individuals have access to the footage recorded by CCTV Monitoring.	R				
Ensure data retained is only used for the purpose intended and that Yarriambiack Shire Council will not disclose imagery to a third party unless it is authorised or required by law	R				
Ensuring the recorded data is stored on a securely on a hard drive with password protected computers and is only accessed by the Approved Provider of Yarriambiack Shire Council and approved Co-Ordinator	R				
Ensuring Smart Video doorbells, CCTV cameras and storage devices are maintained and checked for operational use as per manufacturer instructions.	✓				
Ensuring CCTV cameras and Smart Video Doorbells are visible and are not concealed in any way.	✓	✓			
Ensuring reasonable steps are taken to notify those entering and using the Yarriambiack Shire Council premises of the use of CCTV surveillance and or the use of Smart Video Doorbells. This includes: -Erecting clearly visible Signage at the entrance communicating to staff, families, children, visitors, and contractors that the premise is under CCTV surveillance. -Access the CCTV monitoring policies and procedures -notifying employees upon employment. -notifying employees when CCTV and smart video doorbells are being installed at the service. -Notifying families of enrolled children that CCTV and or smart video doorbells are being installed at the service -Parent handbook includes the use of CCTV and smart Video doorbells.	✓	✓			
Ensure all educators and staff know where to access the CCTV Monitoring and Smart Video Doorbells Policy.	✓	✓			
Ensuring that cameras are positioned so that they are not recording neighbouring properties. Some cameras may show areas such as footpaths or roads that Yarriambiack Shire Council service is situated next to.	✓				
Ensuring no cameras are installed inside the premises and external cameras do not record footage inside the service.	✓				
Ensuring CCTV Cameras do not record data during operational hours of the service. Video only data is recorded only for security for the building and equipment.	✓				
Ensure the location of CCTV cameras provide coverage to meet the purpose of the CCTV system (building security) 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 area of coverage. Specific camera locations will vary depending on the service.					
Ensuring staff, families, children, and contractors are aware that if they access the service (out of service hours) they will be under CCTV surveillance and that the data will be stored securely for up to 30 days at either Yarriambiack Shire Council headquarters or approved locations. This includes weekends where families or staff may be participating in gardening or working bees or staff meetings.	✓	✓	✓	✓	✓
Ensures no sound recorded and only imagery	✓				
Yarriambiack Shire Council does not keep imagery for more than 30 days before it automatically deletes (30 day overwrite in hard drive) This is unless Yarriambiack Shire Council needs to retain data for longer periods due to investigations, legal proceedings or where a law informant agency needs to view the data.	R				
Ensure CCTV cameras are not monitored live unless required in a natural disaster or an event which impacts the safety of staff, families, children and visitors	✓				
Ensure families and staff are aware of the installed smart doorbell at the service. This includes having an understanding of how it functions (voice recordings or a video is displayed on monitor) and the location of the monitors. This can be communicated during inductions, parent handbook, and service tours.	✓	✓	✓		
Establishing robust induction procedures that include the provision of information regarding the implementation of the practices outlined in this policy (<i>National Law: Section 167, Regulation 77</i>)	R	✓			
Ensuring staff members are aware that they will be subject to scrutiny of CCTV cameras and video doorbells as stated in their employee contract.	✓				
Ensure CCTV and smart device installation and use complies with this policy, relevant laws and the National Model Code.	R	✓			
Authorise and document any disclosure of footage to Victoria Police.	R	✓			
Arrange servicing and maintenance of WYYNS Security system and video doorbell systems	✓	✓			
Review this policy biennially or after any incident	✓	✓	✓		
Ensure all staff are trained in, and adhere to, the policy	✓	✓	✓		
Implement the services culture of child safety and wellbeing, including when accessing digital technologies and online learning environments.			✓		
Record and report any security incidents to the Approved Provider		✓	✓		

Model compliance and answer family enquiries about CCTV and smart device usage	✓	✓	✓		
Report any damage or malfunction of cameras immediately		✓	✓		
Respect signage and understand that images are not available for family viewing				✓	
Direct any concerns or requests for information in writing to the Approved Provider		✓	✓	✓	✓
Follow directions regarding areas under surveillance and refrain from unauthorised access to equipment or footage		✓	✓	✓	✓
Ensuring that an inspection of the outdoor areas is conducted each day and damage, theft or incidents are reported to approved provider within 24hrs.		✓	✓		
Informing the approved provider of any issues that impact on the implementation of this policy		✓	✓	✓	✓
Respond to policy breaches, including inappropriate use or disclosure of footage	R	R	✓	✓	✓
Ensure CCTV supports child safety without creating a surveillance culture	✓	✓			
Comply with this policy, Privacy and Confidentiality Policy, and Code of Conduct	R	R	R		R
Respond to privacy breaches per the Privacy and Confidentiality Policy	R	R			
Respond to CCTV-related complaints as per Compliments and Complaints Policy	R	✓			

4 Procedures

4.1 CCTV Camera Locations & Operation

- Each service with installed CCTV Monitoring devices will have signage indicating the use of CCTV cameras. The location of the cameras and the number of cameras installed will vary across the services however they are placed to ensure coverage of areas such as the front entrance and rear yards of the services.
- External only view. No interior spaces are monitored.
- Cameras that capture a portion of the rear yard are disabled during session times.
- Recording is automatically enabled outside operating hours for building security.

Data Storage & Access

- Footage is stored securely either at site on a hard drive in the Services Office or at Yarriambiack Shire Council office on a password protected computer.
- Access is restricted to the Approved Provider (CEO) and the Manager Business Systems.
- No live monitoring by third parties. Local shires and Wynns Security Systems have no access to footage.

Retention & Disposal

- Files are retained for 30 days, after which the system overwrites automatically.
- Earlier deletion or extraction may occur only where footage is required for a police investigation or legal proceeding.

Disclosure

- Data will only be released to Victoria Police upon receipt of a formal written request or warrant.
- Families and other third parties do not have viewing or copying rights.

Signage & Communication

- Clear notices are displayed at each monitored entry/exit indicating CCTV. Operation times and the purpose of surveillance is outlined in the CCTV Monitoring and Smart Video Doorbell Policy.
- The policy is available on the Yarriambiack Shire Council's website and upon request.
- This policy and associated information constitute the formal written notice of surveillance. Consent forms are included in enrolment and staff documentation.

Maintenance & Review

- The Approved Provider arranges annual servicing of all cameras and recording equipment.
- Incident based or scheduled audits verify correct operation, recording schedule and data security.

4.2 Smart Video Doorbell Locations & Operation

- Services with installed Smart Video Doorbells have One fixed doorbell on the doorframe of the front entrance.
- Not all smart doorbells installed at the services use the camera function and instead when activated record a voice message that is sent to the service phone.
- Smart video doorbells have external only view. No interior spaces can be viewed.
- Smart video doorbell cameras view a portion of the front yard at some services or along the footpath/ entry way of the service.

Data Storage & Access

- For the Services with doorbells that use the camera function it can only be viewed live. No SD cards are inserted to ensure no data is recorded or kept. Smart doorbells are not connected to the cloud for data storage.
- The services with smart video doorbells (with the camera in operation) have installed monitors or service mobiles to view who is ringing the doorbell. These monitors are installed in varying locations such as in the rooms, office or entryway. Due to this everyone has access to view in real time when the doorbell is activated or when motion activates the camera.

Retention & Disposal

- No video data is recorded or kept from the doorbells.
- Voice recorded messages left via the doorbells are deleted by staff after listening.

Signage & Communication

- Families are informed about smart video doorbells via the parent handbook, inductions and tours.
- The policy is available on the Yarriambiack Shire Council Services website and upon request.

Maintenance & Review

- Maintenance is organised by the Nominated Supervisor which may involves the replacement of batteries or charging the devices.
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5 Background and Legislation

5.1 Background

Yarriambiack Shire Council follows the guidelines set out by the National Model Code of all use of electrical devices for taking images or videos of children at all our services. The National Model Code recommends minimising surveillance of children in education and care settings. Yarriambiack Shire Council Services' CCTV system is limited to external areas, functions only outside session times, and is used solely to deter unauthorised entry, vandalism and theft.

The National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code) addresses child safe practices for the use of electronic devices while providing early childhood education and care (ECEC).

National Model Code

Part 1

Only service-issued electronic devices should be used when taking images or videos of children while providing education and care. The appropriate use of service-issued electronic devices for taking, sending and storing images or videos of children should be clearly outlined in policies and procedures.

Part 2

Personal electronic devices that can take images or videos (such as tablets, phones, digital cameras, and smart watches) and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage) should not be in the possession of any person while providing education and care and working directly with children. Any exceptions to this should be for limited, essential purposes that are authorised in writing (or through another means if written authorisation is not reasonably practicable) by the approved provider of the service, and where that access does not impede the active supervision of children.

Part 3

Essential purposes for which use and / or possession of a personal electronic device may be authorised for purposes other than taking images or recording videos of children include:

- communication in an emergency situation involving a lost child, injury to child or staff member, or other serious incident, or in the case of a lockdown or evacuation of the service premises.
- personal health requirements, e.g. heart or blood sugar level monitoring.
- disability, e.g. where a personal electronic device is an essential means of communication for an educator or other staff member.
- family necessity, e.g. a worker with an ill or dying family member.
- technology failure, e.g. when a temporary outage of service-issued electronic devices has occurred.
- local emergency event occurring, to receive emergency notifications through government warning systems, for example, bushfire evacuation text notification.

Part 4

Approved providers and their services should have strict controls in place for the appropriate storage and retention of images and videos of children.

The education and care services National regulations require approved providers to ensure their services have policies and procedures in place for the safe use of digital technologies and online environments which is outlined in Yarriambiack Shire Council's Information and Communication Technology Policy and E Safety for children Policy.

The *Privacy Act 1988* and the Australian Privacy Principles (APPs) apply to organisations that handle personal information. Company's that turn over more than \$3 million are likely covered by this Act. Key obligations include:

- Clearly notifying parents and staff about CCTV usage
- Collecting footage only for lawful and necessary reasons
- Storing footage securely and limiting access
- Deleting footage after a reasonable period (typically 14–30 days)

5.2 Legislation and Standards

Relevant legislation and standards include but are not limited to:

- *Education and Care Services National Law Act 2010*
- *Children, Youth and Families Act 2005* (Vic)
- *Public Health and Wellbeing Act 2008*
- Education and Care Services National Regulations 2011 (r. 168 – policies & procedures)
- National Quality Standards– QA2 (Children's Health & Safety) & QA7 (Governance & Leadership)
- *Surveillance Devices Act 1999* (Vic)
- *Privacy Act 1988* (Cth) & Australian Privacy Principles
- *Crimes Act 1958* (Vic)
- *Occupational Health and Safety Act 2004* (Vic)
- National Model Code
- *Fair Work Act 2009* (Cth)
- *Charter of Human Rights and Responsibilities Act 2006* (Vic)

The most current amendments to listed legislation can be found at:

- Victorian Legislation – Victorian Law Today: www.legislation.vic.gov.au
- Commonwealth Legislation – Federal Register of Legislation: www.legislation.gov.au

6 Definitions

The terms defined in this section relate specifically to this policy. For regularly used terms e.g., Approved provider, Nominated supervisor, Notifiable complaints, Serious incidents, Duty of care, etc. refer to the Definitions file of the PolicyWorks catalogue.

- **Approved Provider** – the legal entity holding the service approval
- **Australian Privacy Principals-** (or APPs) Are the cornerstone of the privacy protection framework in the Privacy Act 1988.
- **CCTV** – Closed-Circuit Television; fixed video cameras connected to a private recording system. A video surveillance system where signals are not publicly distributed but are monitored and recorded for authorised use to enhance safety and security.
- **Out-of-hours** – any time outside licensed operating or session times for Kindergartens or Child Care Service.
- **Session times** – hours during which children are in attendance and programs are delivered.

- **Hard drive** – encrypted local storage unit retaining footage for 30 days.
- **National Model Code:** The National Model Code for Taking Images or Videos of Children in Early Childhood Education and Care (ECEC) is a set of guidelines developed to promote child safety when using electronic devices to capture images or videos of children.
- **Personal Information:** Personal information has the meaning given under the Privacy Act 1988 (Cth). It includes any recorded or unrecorded information about an identified or reasonably identifiable individual
- **Authorised Personnel:** Individuals who have been granted specific permission to access CCTV footage, including the Approved Provider, Nominated Supervisor, or designated security or IT staff.
- **Restricted Access Areas:** Locations within the service that are not open to the general public or children, such as staff rooms, storage areas, or administrative offices.
- **Monitoring:** The process of observing activities and environments in real time via CCTV to ensure safety and compliance with policies.
- **Recording:** The capturing and storing of surveillance footage on a physical or digital medium for later review or evidence.
- **Retention Period:** The length of time that surveillance footage is stored before it is deleted or overwritten, unless required for investigation or legal proceedings.
- **Privacy Breach:** The unauthorised access, use, or disclosure of personal information, including surveillance footage that identifies individuals.
- **Smart Devices:** Smart devices refer to electronic devices that have the capability to connect to the internet or other networks, and can collect, transmit, or store data. These devices often include features such as cameras, microphones, GPS, or the ability to run applications (apps). This includes, but is not limited to:
 - Smartphones
 - Smartwatches and fitness trackers (e.g. Apple Watch, Fitbit)
 - Tablets (e.g. iPad)
 - Laptops and hybrid devices
 - Voice-activated assistants (e.g. Alexa, Google Home)
 - Internet-connected toys or learning tools with data-sharing capabilities
- **Smart Video doorbell:** A smart doorbell is a type of internet-connected device installed at entry points of a service (e.g. front doors or gates) that typically includes a camera, microphone, speaker, and motion sensor. These devices allow staff or authorised personnel to:
 - View live video footage of people approaching or pressing the doorbell
 - Communicate with visitors via two-way audio
 - Receive alerts when motion is detected near the entrance
 - Record and store video or audio footage for security or access management

7 Sources and Related Policies

7.1 Sources

- Early Learning Association Australia (ELAA) Sample Policies
- National Model Code for Education and Care Services
- Office of the Victorian Information Commissioner – Guidelines to Surveillance and Privacy

- WYYNs Security Systems Product Manual
- Office of the Victorian Information Commissioner (OVIC): www.ovic.vic.gov.au
- Office of the Australian Information Commissioner (OAIC): www.oaic.gov.au/privacy/guidance-and-advice
- Australian Children's Education & Care Quality Authority (ACECQA): www.acecqa.gov.au

Related Policies

- Privacy and Confidentiality Policy
- Child Safe Environment and Wellbeing Policy
- Safe Use of Digital Technologies and Online Environments Policy
- eSafety for Children Policy
- Incident, Injury, Trauma & Illness Policy
- Compliments and Complaints Policy
- Code of Conduct
- Occupational Health and Safety Policy
- Enrolment and Orientation Policy
- Governance and Management Policy

8 Evaluation

In order to assess whether the values and purposes of the policy have been achieved, the approved provider will:

- Regularly seek feedback from everyone affected by the policy regarding its effectiveness.
- Monitor the implementation, compliance, complaints and incidents in relation to this policy and ensure satisfactory resolutions have been achieved.
- Keep the policy up to date with current legislation, research, policy and best practice
- Revise the policy and procedures as part of the service's policy review cycle, or as required.
- Notifying all stakeholders affected by this policy at least 14 days before making any significant changes to this policy or its procedures, unless a lesser period is necessary due to risk (Regulation 172 (2)).

9 Attachments

- Attachment 1: CCTV Consent form for families
- Attachment 2: CCTV Consent form for staff

CEO Approved Policy

Adopted:	19 September 2025	Tammy Smith	
Reviewed:			

ATTACHMENT 1. CCTV CONSENT FORM FOR FAMILIES**Purpose of CCTV surveillance**

Yarriambiack Shire Council is committed to providing a safe and secure environment for children, families, staff, and visitors. Closed-Circuit Television (CCTV) is used in designated areas to offer safety, deter unauthorised access, and protect property.

Consent and agreement

By signing this form, I confirm that:

- I understand CCTV is installed only in locations permitted under the CCTV Policy and that these areas are clearly signposted.
- I acknowledge that CCTV is not used in private areas such as bathrooms, nappy change areas, sleep rooms, staff facilities, breastfeeding or prayer spaces. Yarriambiack Shire Council only has CCTV cameras installed externally. These cameras do not view inside the buildings.
- I acknowledge that CCTV only records data outside of service hours and if I access the service out of hours (gardening or working bee's etc) I will be under surveillance.
- I understand the primary purpose of CCTV monitoring is to enhance safety and security of the building, and not to monitor staff performance or children/ families
- I acknowledge that CCTV footage may be considered personal information and will be managed in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles.
- I understand that access to footage is restricted to authorised personnel and may only be shared externally where legally required.
- I consent to footage being stored securely for the defined retention period under the CCTV Policy and securely deleted thereafter, unless required for investigation or legal proceedings.
- I understand I may withdraw my consent to Yarriambiack Shire Council in writing at any time. Withdrawal may impact my or my child's access to the service.

Child's name: _____

Parent/Guardian name: _____

Signature: _____

Date: _____

ATTACHMENT 2. CCTV CONSENT FORM FOR STAFF**Purpose of CCTV surveillance**

Yarriambiack Shire Council is committed to maintaining a safe and secure environment for all staff, children, families, and visitors. Closed-Circuit Television (CCTV) is used in designated areas to support safety, deter unauthorised access and protect property.

Consent and agreement

By signing this form, I confirm that:

- I understand CCTV is installed only in locations permitted under the CCTV Policy and that these areas are clearly signposted.
- I acknowledge that CCTV is not used in private areas such as bathrooms, nappy change areas, sleep rooms, staff facilities, breastfeeding or prayer spaces. Yarriambiack Shire Council only has CCTV cameras installed externally. These cameras do not view inside the buildings.
- I acknowledge that CCTV only records data outside of service hours and if I access the service out of hours (meetings, gardening or working bee's etc) I will be under surveillance.
- I understand the primary purpose of CCTV monitoring is to enhance safety and security of the building, and not to monitor staff performance or children/ families
- I acknowledge that CCTV footage may be considered personal information and will be managed in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles.
- I understand that access to footage is restricted to authorised personnel and may only be shared externally where legally required.
- I consent to footage being stored securely for the defined retention period under the CCTV Policy and securely deleted thereafter, unless required for investigation or legal proceedings.
- I understand that I may withdraw my consent in writing at any time and that withdrawal however may impact my access to the workplace.

Staff member's name: _____

Staff member's signature: _____

Date: _____