



Draft Closed Circuit TV (CCTV) Policy

Crystal Ballroom Canberra Group

6/38 Reed Street North, Greenway, ACT, 2900

DRAFT CCTV POLICY

Forward

Crystal Ballroom Canberra Group Pty Ltd (“CBCG”) is not required to develop policies related to Closed Circuit Television (“CCTV”) as outlined in the information contained in the requirements by the Office of the Information Commissioner (OAIC), this Policy has been developed in the interest of transparency.

1 Policy Statement

- 1.1 This is a draft CCTV Policy statement and is in effect as is until finalised.
- 1.2 CBCG uses Close Circuit Television (“CCTV”) as outlined in this Policy. This Policy applies to all current and future premises operated by CBCG.
- 1.3 This policy applies to anyone who enters the premises, in the immediate vicinity of the entry area and all other persons whose images may be captured by the CCTV system.
- 1.4 This policy sets out the use of CCTV by CBCG.

2. Purpose of CCTV

- 2.1 CBCG uses CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for anyone in or within the immediate vicinity of the Ballroom
 - 2.1.2 To monitor compliance with relevant WHS Legislation
 - 2.1.3 To prevent the loss of or damage to the ballroom and/or CBCG assets. Where loss or damage is identified, the invoicing of the correct hire client
 - 2.1.4 To assist in the prevention of crime and assist law enforcement agencies in the identification of alleged victims and/or apprehending alleged offenders
 - 2.1.5 To ensure accurate invoicing for hire of the Ballroom for entry and exit times in line with client agreements
 - 2.1.6 To ensure, where additional fees incurred as a result of hire of the Ballroom is required, the correct client is invoiced where deemed necessary
 - 2.1.7 To identify and investigate potential breaches of terms and conditions of hire
 - 2.1.8 To deter tampering with ICT infrastructure in the Ballroom.
 - 2.1.9 To capture images and/or recordings for the purpose of any insurance claims

- 2.1.10 CBCG may access live stream the CCTV to ensure the safety of occupants and ensure compliance conditions of hire.

3 Description of system and placement of cameras

- 3.1 The cameras are linked back to a Network Video Recorder (NVR) located in the Office area in the Ballroom.
- 3.2 Cameras will not be placed in locations where a reasonable person would expect privacy. Cameras will not be placed inside bathrooms or change rooms.
- 3.3 Several cameras may be placed, which may or may not have audio recording capabilities, in various locations in the Ballroom to ensure sufficient coverage to monitor CBCG property and/or assets.
- 3.4 CCTV operates on a 24/7 basis, with images and/or recordings recorded upon activation of motion and/or PIR activation or where video is accessed live to capture relevant evidence relevant to this Policy.
- 3.5 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to anyone entering the venue.

4 Management and Access

- 4.1 The CCTV system is managed by CBCG.
- 4.2 On a day to day basis the CCTV system will be operated by CBCG
- 4.3 The viewing of live CCTV images will be restricted CBCG. In doing so they will ensure that the purposes in 2.1 are satisfied.
- 4.4 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images and/or recordings.
- 4.5 The CCTV system is regularly checked to ensure that it is operating effectively
- 4.6 CBCG may remotely access the CCTV system via a Virtual Private Network (VPN), or applications provided by the system manufacturer in line with this Policy.

5 Storage and Retention of Images

- 5.1 Any recordings by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 5.2 Recorded images are stored until the data is automatically overwritten by the system unless there is a specific purpose for which they are retained for a longer period.

5.3 CBCG will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

5.3.1 CCTV recording system being located in a designated restricted access area;

a) For the purpose of this Policy, the Office has been designated as a restricted area.

5.3.2 The CCTV system being encrypted/password protected;

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Access to Designated Restricted Area

6.1 Access to the restricted area is limited to CBCG. However, this Policy acknowledges the designated restricted area is utilised for the secure storage of belongings of CBCG clients directly linked to their purpose of hire.

6.2 For this Policy, access to the restricted area is extended to the following who have been provided a key to the designated restricted area:

6.2.1 Direct clients of CBCG who store items within the restricted area for the purpose of retrieval / returning of their items stored in this area

6.2.2 Direct employees, subcontractors, or teachers of clients of CBCG for the explicit purpose of retrieving / returning items for the purpose of hire.

6.3 The designated restricted area is monitored by the CCTV system for the security of the designated restricted area and compliance with this Policy.

6.4 The designated secure area door must remain closed at all times where non authorised individuals are present in the Ballroom

6.5 This Policy acknowledges access to the designated restricted area by individuals not outlined in clause 6.1 and 6.2 may be required for the purpose of repairs and maintenance and responding to emergency situations. Where access is provided to anyone outside clauses 6.1 and 6.2 for the purpose of maintenance and repairs or the response to an emergency situation, the designated restricted area access log must be completed.

6.6 Any individual outlined in clause 6.2 who permit access to any other individual in contradiction to clause 6.2 will be considered to have breached this Policy and may be subject to financial penalties as determined by CBCG and invoiced to the hirer.

6.7 Where any individual subject to clause 6.2 continues to permit access to any individual not covered in this clause may at the discretion of CBCG have the access for the hirer revoked and be required to have all stored belongings removed within 24 hours and return all access keys in the timeframe determined by CBCG.

7 Disclosure of Images and/or Recordings

- 7.1 CBCG will not disclose any captured images and/or recordings unless in line with this Policy.
- 7.2 CBCG will provide images in line with clause 2.1.4 to 2.1.7 where deemed necessary for the purpose of evidence of incurred additional fees being applied to client invoices or non-compliance of terms and conditions, as it is reasonably expected it is the client or their direct employee, subcontractor or teacher is in their employ and their identity is known. No further dissemination of this information is permitted under any circumstances.
- 7.3 CBCG may allow law enforcement agencies, for the purpose of their law enforcement duties and public safety, to view any captured images and/or recordings where any reasonable person would expect CBCG assist in law enforcement investigations and/or activities in the interest of public safety.
- 7.4 Any request by law enforcement agencies to obtain images and/or recordings captured by the CCTV system must be made in writing outlining:
 - 7.4.1 Date and specific time period required
 - 7.4.2 Reason for the request and purpose of the investigation
- 7.5 If subpoenaed by a court, CBCG will only provide images and/or recordings captured by our CCTV system to the extent to comply with such request.
- 7.6 Where audio may be have been captured by a camera, CBCG will make every effort to ensure audio is removed before providing evidence in line with clause 7.2.
- 7.7 Where requests are made in line with clauses 7.3 to 7.5, CBCG will make every effort to ensure any audio captured is removed, unless any audio that may have been captured is required for the purpose of the requests.

8 Disclosure of images and/or recordings to Third Parties

- 8.1 CBCG may be required to release images and/or recordings not already specified in this policy.
- 8.2 Where CBCG deems it appropriate to release images and/or recordings, CBCG will direct third parties only use the images and/or recordings for the intended purpose. Recipients will be required agree not to disclose or provide images and/or recordings to any other party without the prior written permission from CBCG.

9 Ownership of all images and/or recordings from the CCTV system

9.1 CBCG retains ownership of all images and/or recordings captured on the CCTV system and cannot be used in any other manner outside this Policy unless explicitly approved in writing.

10. Review of Policy and CCTV System

10.1 This policy will be reviewed every two years or earlier should the need arise.

Version:	0.1
Date created:	6 March 2024
Author:	Joel Player
Review date:	TBC on Finalisation of draft Policy

Revision History:

Version	Date created	Author	Summary of changes
0.1	6 March 2024	Joel Player	Initial Draft