

7-P20: CCTV Policy



Responsible	Nominated Supervisor, Approved Provider		
Accountable 1	Chief Operating Officer	Accountable 2	Approved Provider
Consulted	Legal, IT, Executive, AEG Board		
Informed	All staff		

Policy Statement and Background

The Regulations require childcare providers, like Affinity, to ensure policies and procedures are in place for the safe use of digital technologies and online environments at all centres, including to ensure reasonable precautions are taken to protect children from harm and hazard.¹

Affinity centres may be equipped with Cameras to:

- strengthen the security of the centre including to minimise the risk of theft and criminal activity;
- meet the requirements of Laws and the Regulations from time to time;
- assist with investigations of any actual or suspected incidents which may require collection of supporting evidence, including allegation of breaches of Laws or the Regulations; and
- improve risk management controls and to safeguard children, educators and others at the centre.

This CCTV Policy describes the processes and procedures implemented to ensure the safe and lawful use of Cameras at Affinity centres, and access to and use of footage recorded by Cameras.

Definitions

Affinity/we/us/our means Affinity Education Group Pty Limited ABN 37 163 864 195;

Cameras means optical surveillance devices, including closed-circuit television (**CCTV**) cameras that do not record sound;

CCTV Policy means this policy and as amended from time to time which is made available on our website and in physical copy on request;

centre and Affinity centre means a childcare centre owned and operated by Affinity;

Centre Manager means the centre manager of the relevant Affinity centre who has day to day operational management of the relevant centre.

Laws means all legislation, regulations, common law, rules, regulatory codes and guidelines, standards and industry requirements whether at commonwealth, federal, state, territory, local or municipal level and relevant to the subject matter of this CCTV Policy, including Privacy Laws and Surveillance Laws;

Personal Information has the meaning given to it under Privacy Laws;

Privacy Laws means the *Privacy Act 1988* (Cth) and the Australian Privacy Principles as amended from time to time;

Regulations means Education and Care Services National Regulations and any other regulations from time to time applicable to the early childcare education and care (**ECEC**) sector; and

Surveillance Laws means the *Surveillance Devices Act 2007* (NSW), *Surveillance Devices Act 1999* (Vic), and *Surveillance Devices Act 2007* (NT), and *Surveillance Devices Act 1998* (WA) as amended from time to time.

Implementation and maintenance

Affinity will comply with all relevant Laws and the Regulations when implementing this CCTV Policy.

Any Cameras located in or at Affinity centres will be:

¹ Section 167 of the *Education and Care Services National Law*; Regulation 168 of the *Education and Care Services National Regulations* (**Regulations**); Quality Areas 2.2.1 and 7.1 of the *National Quality Standards* (**NQS**).

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- a) installed by qualified contractors in compliance with Laws, the Regulations, operational manuals and manufacturer instructions;
- b) positioned in a way to ensure:
 - i) the Cameras are, where possible, visible to persons in the centre and not concealed in any unreasonable way;
 - ii) no footage will be captured in areas where a person would reasonably expect privacy, including bathrooms, staff rooms, parents rooms and breastfeeding locations, and changing rooms, and to maintain the rights and dignity of children;² and
 - iii) general areas used by children will be targeted rather than specific individuals (e.g. play areas, corridors, car parks, reception areas); and
- c) monitored by Affinity who will ensure qualified contractors maintain, repair and replace Cameras as and when deemed necessary by Affinity in compliance with Laws, the Regulations, operational manuals and manufacturer instructions.³

Affinity may change the location of, uninstall, reinstall or install additional Cameras at any of the centres as and when Affinity considers it reasonably necessary including, to comply with Laws and the Regulations.

Affinity will, in accordance with the requirements of Laws and the Regulations, notify people at the centres that Cameras are installed, including:

- a) erecting signage in centres notifying people that video surveillance is in use;
- b) making this CCTV Policy available on the Affinity website and in physical copy on request;
- c) having this CCTV Policy notified or consented to by:
 - i) parents via signage, the child enrolment form or electronic form;
 - ii) centre-based employees via the employment agreement or internal policy; and
 - iii) other people engaged by Affinity who provide goods and services to centres via signage, the relevant engagement agreement or electronic form.

A failure to provide consent to this CCTV Policy, if required, may result in access to the centre being denied (including enrolment being terminated).

Monitoring, storage and access

The Cameras record footage in real time and monitor on a continuous 24-hour basis, 7 days a week. Within Affinity, only authorised personnel are permitted to monitor, review, access and download Camera footage (including still imagery) which will be encrypted and monitored to prevent unauthorized viewing. Footage is accessed by multi-factor authentication and will be logged and tracked by the IT department. Access or footage downloads may be given to third parties, including the Police, Department of Education and other regulatory bodies, in accordance with Laws and the Regulations, and will, in all cases, be limited to circumstances outlined in this CCTV Policy and other relevant internal policies and procedures including:

- d) to provide supporting evidence for internal investigations relating to allegations of breach or misconduct;
- e) to assist Police or other regulatory or enforcement authorities to conduct external investigations;
- f) as required by a Court order or subpoena, or in accordance with Laws or the Regulations;
- g) to assist other regulatory bodies relating to the protection of children; and
- h) to make insurance claims.

The Cameras will be used for purposes outlined in this CCTV Policy and as permitted by Laws and the Regulations.

² Regulation 115 of the Regulations; Quality Area 5.1 of the NQS.

³ Quality Area 3.1 of the NQS.

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All requests to review or access Camera footage must be made in writing to the Compliance and Quality Team who will, alone or in conjunction with the Legal team, make a determination regarding such requests within a reasonable time having regard to the circumstances. Any decision following a request will be made in accordance with Laws, the Regulations, this CCTV Policy and any other relevant internal policies and procedures, including Affinity's Privacy Policy. Access to footage can be set for specific time periods and be automatically revoked when no longer needed.

Affinity will retain Camera footage for a period necessary in the circumstances and in accordance with Laws and the Regulations. For example, if the footage is required by the Police or regulatory authority for an investigation, Affinity will retain the footage for such period as directed by the relevant authority. Where Affinity reports an incident to Police or regulatory authority for investigation, or is made aware of an investigation by such authorities involving a centre, recorded Camera footage for that centre will immediately be preserved and retained for disclosure to investigating authorities upon formal request. After the footage is no longer required by the investigation, it will be deleted in accordance with Privacy Laws.

Unless otherwise required by Laws, the Regulations or pursuant to an investigation by relevant authorities, Camera footage is retained for 30 days, after which period recorded Camera footage for each Affinity centre will be securely deleted or recorded over/overwritten by the relevant network system.

Security

All Camera footage is encrypted and locally stored on the device. The footage will only be accessible by authorised personnel as outlined in the procedure below. Affinity will take all reasonable steps to protect Camera footage from unauthorised access and cyber-attacks including the use of firewalls with advanced threat protection features.

In the event of an actual or suspected security incident relating to the Cameras (including the raw footage or still imagery), Affinity will promptly investigate the incident and determine if there has been a data breach involving Personal Information, and if so, Affinity may notify all relevant authorities and persons in accordance with Privacy Laws.

Information, feedback and compliance

All staff, volunteers and others working for (or engaged by) Affinity who will (or may be required to) attend centres will be made aware of, and must comply with, this CCTV Policy which is published on Affinity's website and available in physical copy at centres and on request.⁴ Non-compliance with this CCTV Policy may result in disciplinary action being taken, including termination of employment or engagement with Affinity.

Affinity will notify enrolled families via its website at least 14 days prior to any change made to this CCTV Policy that would have a significant impact on Affinity's ability to provide childcare services to enrolled children or any family's ability to utilise childcare services.⁵ However, Affinity may not provide prior notice of a change to this CCTV Policy where a notice period would pose a risk to the safety, health or wellbeing of any enrolled child. In those circumstances, Affinity will notify enrolled families as soon as practicable after making any change.

Any concerns, questions of feedback relating to Cameras or this CCTV Policy can be directed to Affinity's Education Family Support Team by emailing feedback@affinityeducation.com.au.

Procedure – CCTV rollout, requests for access and retrieval of Camera footage

The below sets out the main responsibilities of different departments which may change as directed by Affinity from time to time.

Centre Level

The Centre Manager is responsible for:

1. ensuring appropriate signage is displayed in areas (including carparks) where Cameras are located that state 'CCTV cameras are used' or similar message;
2. ensuring that a hard copy of this CCTV Policy is available at their centre.

The Nominated Supervisor is responsible for:

1. implementing this CCTV Policy, including notifying staff about their roles and responsibilities under this CCTV Policy and any changes made to this CCTV Policy; and
2. notifying all families, staff and others who are engaged by Affinity and visit centres that Cameras are in use, including ensuring

⁴ Regulations 170 and 171 of the Regulations; Quality Area 2.2.3 of the NQS.

⁵ Regulation 172 of the Regulations.

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those who object to the use of Camaras are not permitted to enter centres where there are Cameras.

Centre Support Office Level

The IT team is responsible for:

1. Controlling access to the camera system and provide access with relevant approvals.
2. Arranging qualified contractors to attend to the installation for repair and maintenance and replacement of Cameras.

The Compliance and Quality team is responsible for:

1. Considering requests for access to, and retention and disclosure of Camera footage;
2. Requesting footage or access from the IT team; and
3. Performing investigations.

The Legal Team is responsible for:

1. Considering requests for access to, and retention and disclosure of, Camera footage by third parties as directed by the Compliance and Quality Team; and
2. Approving disclosure of Camera footage to a third party.

Version Control	Date	Author	Description of Change
1	October 2025	AEG	*New Policy*

Policy Owner: IT Team	Approved Date: October 2025	Next Review Date: October 2027
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