



Closed-Circuit Television (CCTV) Policy

QUALITY AREA 2: Children's Health and Safety

Policy Statement

Our service uses closed-circuit television (CCTV) exclusively to enhance children's safety and wellbeing; all operation complies with the Privacy Act 1988 (Cth), state and territory surveillance legislation, the Education and Care Services National Law, and sector guidance on children's digital rights (Early Childhood Australia, 2018; ACECQA, 2024). CCTV must never substitute active supervision; rather, it supplements vigilant, in-person practices that uphold each child's right to privacy, dignity, and protection.

Scope

Responsibilities

This policy applies to all educators, families, and management of Jacaranda Preschool.

Delegations

The Preschool Director and General manager of corporate services are responsible for the implementation of this policy.

Policy

Goals / What are we going to do?

Staff at our service will:

- Safeguard children by positioning cameras only in approved communal areas and exit points.
- Collect, store, and share footage in strict accordance with the Australian Privacy Principles (APPs) and relevant surveillance laws.
- Inform families, educators, visitors, and contractors of CCTV use through signage, enrolment information, and policy access.
- Obtain written consent before using images or video for any purpose beyond security or incident investigation.
- Review CCTV practices annually or sooner if legislative changes occur.
- The Nominated Supervisor will ensure new employees and families are provided with a copy of, or access to a copy of the CCTV policy before they start at the service.



Legislative requirements

This policy reflects the legislative requirements for the use of CCVT and includes, but is not limited to:

Section/regulation Description	Authority/Responsibility For
National Law s.165	Duty of approved provider, nominated supervisor, and educators to ensure adequate supervision.
National Law s.167	Duty to protect children from harm and hazards.
National Regulations r.168(2)(n)	Requirement for a privacy and confidentiality policy (includes digital records).
Privacy Act 1988 (Cth) – APPs 1-13	Collection, storage, use, and disclosure of personal information (includes images).

The approved provider Livable is responsible for ensuring that the CCTV system is installed and operates in compliance with relevant laws and regulations and the cameras and systems are maintained and serviced as per manufacturer instructions.

Strategies / How will it be done?

1. Installation and placement

- Install fixed cameras only in indoor learning areas, entrances, and outdoor play yards; avoid change rooms, toilets, and staff rest areas.
- Position cameras to minimise unnecessary capture of neighbouring properties or public spaces.

2. Access and use of footage

- Restrict live viewing and playback to the approved provider, nominated supervisor, or delegated persons for incident investigation.
- Record all access in a CCTV access log (date, time, reason, user, outcome).
- 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 potential or actual harm.
- Access to live CCTV imagery may be used to inform decisions during a natural disaster or weather event that impacts safety of employees, 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



3. Secure storage and data retention

- Store footage on encrypted, password-protected servers located in Australia or on-site network-attached storage.
- Camera surveillance images are recorded and stored in a secure location by the company and will only be accessed by authorised representatives and used in accordance with the purpose for which the system was installed.
- Recordings will be retained for no longer than is strictly necessary to fulfil its purpose, approximately 30 days unless footage is needed for a reportable incident, investigation, or legal proceeding; delete securely thereafter.
- In the case of an internal investigation or legal proceeding, the footage may be stored for periods of up to 12 months after the completion of the investigation or legal proceeding, or otherwise as required by law.

4. Communication and consent

- Display clear signage at all entry points stating that CCTV is in operation for safety purposes.
- Provide families with written information about CCTV during enrolment and obtain consent for incidental recording.
- Give staff and visitors notice that they may be recorded while on the premises.

5 Breach management and review

- Report unauthorised access, disclosure, or loss of footage to the approved provider and nominated supervisor within one working day.
- Conduct an incident review, notify affected parties, and lodge any required data breach notifications with the Office of the Australian Information Commissioner (OAIC).
- Evaluate system performance and policy compliance annually, incorporating feedback from families and educators.



Roles and responsibilities

Role	Authority / Responsibility
Approved Provider	<ul style="list-style-type: none"> Approving policy; funding, selecting, and maintaining CCTV system; ensuring compliance with legislation and APPs; authorising release of footage to external agencies.
Nominated Supervisor	<ul style="list-style-type: none"> Implementing policy; maintaining CCTV access log; liaising with families and regulators; training staff on privacy obligations.
Early Childhood Educators	<ul style="list-style-type: none"> Actively supervising children; reporting technical faults or privacy concerns; modelling respectful use of digital technologies.
Families	<ul style="list-style-type: none"> Reviewing and acknowledging CCTV policy; raising concerns or requests regarding their child's image; supporting privacy practices at home.
IT / Security Contractor	<ul style="list-style-type: none"> Installing and servicing CCTV equipment; ensuring data security controls meet Australian Standards; reporting vulnerabilities promptly.

Monitoring, evaluation and review

This policy will be monitored to ensure compliance with legislative requirements and unless deemed necessary through the identification of practice gaps, the service will review this Policy every two years.

Families and staff are essential stakeholders in the policy review process and will be given opportunity and encouragement to be actively involved.

In accordance with R. 172 of the *Education and Care Services National Regulations*, the service will ensure that families of children enrolled at the service are notified at least 14 days before making any change to a policy or procedure that may have significant impact on the provision of education and care to any child enrolled at the service; a family's ability to utilise the service; the fees charged or the way in which fees are collected.



Key terms

To support educators and families the following terms are included to guide practice.

Term	Meaning	Source
ACECQA – Australian Children’s Education and Care Quality Authority	The independent national authority that works with all regulatory authorities to administer the National Quality Framework, including the provision of guidance, resources and services to support the sector to improve outcomes for children.	acecqa.gov.au
Adequate supervision	An educator can respond immediately, particularly when a child is distressed or in a hazardous situation Knowing where children are at all times and monitoring their activities actively and diligently. Ensure that only educators working directly with children are included in the ratios	Guide to the NQF (Operational Requirements – Quality Area 2)
APPs	Australian Privacy Principles outlining obligations for handling personal information.	Privacy Act 1988
CCTV	A closed network of cameras and monitors used to transmit and record video images for surveillance purposes within the service.	Adapted from OAIC guidance
Personal information	Information or opinion about an identified individual or an individual who is reasonably identifiable (includes images).	Privacy Act 1988
Surveillance device	Any optical, listening, tracking, or data surveillance device as defined in state legislation.	Surveillance Devices Act 2007 (NSW)



Related Guidelines, Standards, Frameworks

- National Quality Standard, Quality Area 2: Children’s Health and Safety

Related Legislation

- Education and Care Services National Law Act 2010: Sections 165, 167
- Education and Care Services National Regulations: Regulation 168(2)(h)&(a)(iii)
- Privacy Act 1988 (Cth)
- Surveillance Devices Act 2007 (NSW)
- Invasion of Privacy Act 1971 (Qld)

Related Policies

- [Providing a Child Safe Environment](#)
- [Emergency and Evacuation](#)
- [Excursions](#)
- [Incident, Injury, Trauma and Illness](#)
- Privacy and Confidentiality
- Providing a Child Safe Environment
- Digital Technology and Online Safety

Version	Date	Review Date
1.0	19/07/2024	19/02/2026 22/08/2026
		Updates to the NQF review and National Regulations coming into effect from 01/09/2025.
Review Dates	22/08/2025	
Amendment dates	22/08/2025	Full update and review.