

Scope

The policy applies to all tenants, households, visitors, employees, contractors and volunteers of Pacific Link Housing (PLH) and its wholly owned subsidiaries (PLH Group).

The policy is applicable to the Closed Circuit television (CCTV) surveillance systems installed and operated by the PLH Group at properties that they own and/or manage. This includes cameras, recording devices and the footage recorded.

Policy Statement

CCTV can be effective in reducing or preventing crime if it is part of a broader crime prevention and community safety strategy. CCTV can bring benefits to the community through a reduction in crime which can lead to enhanced perceptions of safety in a particular area.

The additional protection provided by surveillance cameras is beneficial in maintaining the lawful and safe use of PLH Group properties and for workplace health and safety of our employees. The use of video surveillance must balance the personal privacy of individuals with the safety and security of individuals, property and the community.

Purpose

This policy details PLH Group's approach to the use and management of CCTV cameras and video surveillance footage. Surveillance camera installations may be used to benefit the safety and security of PLH Group staff and volunteers, tenants, contractors, visitors and PLH Group property. The objectives of the CCTV installations are:

- to reduce crime levels by deterring potential offenders;
- to reduce fear of crime;
- to assist in the detection and prosecution of offenders; and
- to help secure a safer environment for those people who live in, work in and visit the properties.

Principles

The following key principles for operation of the CCTV installations at PLH Group owned and managed properties:

- Will be operated fairly, within applicable law and only for the purposes outlined in this Policy.
- PLH Group has primary responsibility for compliance with the policy, installation, maintenance, management and security.
- PLH Group will cooperate the NSW Police Force as appropriate (refer Policy: *CP19 Privacy & Confidentiality Policy and CP37 Tenancy Responsibilities, Disputes and Behaviour Policy*).
- PLH Group will install clear signage as to ownership and operation of the installations and provide information to relevant parties on request.
- PLH Group will respect privacy and confidentiality obligations in location of cameras, restricting access to recorded material to authorised managers and protecting it from unauthorised access.
- PLH Group will conduct audits of the operation and sharing of recorded material by testing its compliance against relevant policy, legislation and procedures.

CCTV Camera Location

Video surveillance systems are installed at most multi-tenancy owned or managed sites. Locations for CCTV are determined by considering data collected by the PLH Group which may include data from the NSW Police Force, asset value and ownership of the properties..

Cameras are carefully positioned so that they will not record or intrude on the personal affairs of an individual within their own properties. Camera positioning should minimise privacy intrusions and be installed to monitor only those spaces that have been identified as requiring surveillance. These include public thoroughfares, open grounds, community centres and common areas including children's playgrounds.

At the start of and during a tenancy tenants will be informed of the use of CCTV surveillance where applicable. If you would like further details on camera locations in your area and their range of vision you can make a request to the PLH Group.

CCTV is also installed at PLH Group offices.

Signage

Prominent and appropriate signage will be permanently displayed in the general location of the camera coverage advising of the presence of CCTV cameras. Signs will advise that the cameras are in constant operation and provide contact details for PLH Group, as the system owner.

Camera Operation

Cameras are of colour resolution, night-vision enabled, motion-activated and are fixed. The cameras are not capable of being panned, tilted or zoomed. No sound is recorded. State of the art technology has been used to ensure maximum resolution and picture quality.

Each camera is housed and positioned in a manner that protects the camera from unauthorised access. PLH Group will establish and resource a regular maintenance program, by suitably qualified operators, of the cameras and systems to ensure effective operation.

Recorded Material

There is no real time monitoring of camera footage. Cameras are connected to central, locked control facilities and material is recorded on digital video recorders. Recorded material is retained for varying periods depending on the capacity of the storage device and securely deleted when no longer required.

Images where an incident has occurred may be retained until resolution of the incident or indefinitely, depending on the circumstances and the PLH Group's obligations. As the owner of the CCTV installations, PLH Group retains ownership of, and has copyright in all equipment, recorded material and documentation.

Management of Recorded Material

To comply with privacy and confidentiality obligations, the circumstances in which police or other relevant agencies are able to access the recorded material will be carefully controlled. Appropriate security measures will be taken against unauthorised access to, alteration, disclosure, accidental loss or destruction of recorded material.

All requests for access to recorded material must be authorised by either the CEO, Group Executive Manager, Operations or Manager, Housing Services and will be considered in line with our privacy and other legal obligations.

In order to protect the privacy of tenants, staff and contractors, any footage captured with CCTV surveillance will not be available to tenants, their support workers or advocates. In the event of a criminal activity occurring and where CCTV surveillance may provide crucial evidence, tenants should contact the police who can make a formal request to access the footage.

Where circumstances allow access to CCTV footage, it will be limited to:

- NSW Police, in circumstances where:
 - It is reasonably believed there is a serious and imminent threat to the life, health or safety of an individual;
 - The information is reasonably necessary for law enforcement purposes; or
 - To assist a police investigation into a missing person
- Authorised PLH Group employees in relation to legal proceedings, including proceedings in the NSW Civil & Administrative Tribunal (NCAT), and neighbourhood complaints,
- Department of Communities and Justice in relation to mandatory child protection reporting obligations,
- Authorised contractors for maintenance and training of the system, and
- Other statutory agencies or parties where PLH Group has an obligation to provide this information.

PLH Group may refuse to provide footage in circumstances provided by privacy legislation, including:

- where it is reasonably believed that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious.

Complaints Handling

Complaints may be raised using PLH Group's Complaints Policy.

Audit & Review

Regular monitoring and auditing of the CCTV program will be undertaken to identify whether the purposes of the policy are being achieved and the principles being complied with.

Related Policies

CP19 Privacy & Confidentiality Policy

CP37 Tenancy Responsibilities, Disputes and Behaviour Policy

Policy Owner	Group Executive Manager, Legal Compliance & Risk
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