

T 4.14 Using Closed-Circuit Television (CCTV) Policy

1. Purpose

This policy outlines how Common Equity NSW (CENSW) uses closed-circuit television (CCTV) in residential properties to enhance community safety, deter crime, and safeguard tenants and property assets. It sets out how CCTV is installed, operated, accessed, and managed in accordance with applicable privacy laws.

2. Scope

This policy applies to all properties managed by CENSW where CCTV has been installed, including systems implemented by member Co-operatives. It does not apply to CCTV installed by tenants or third parties without CENSW authorisation.

3. Policy

CCTV is not automatically installed at all sites. It is used selectively, only in locations where a clear and documented need has been identified. This is typically in response to safety concerns, repeated incidents, or in collaboration with law enforcement. Before installation, CENSW conducts a risk-based assessment to ensure the use of CCTV is appropriate and proportionate.

When used, CCTV is generally installed in shared areas such as entrances, hallways and common outdoor spaces. Its operation is intended to support tenant safety and community wellbeing and must always respect individuals' rights to privacy and be compliant with relevant laws and policies.

Where conflicts arise between this policy and legislation, the legislative requirements will prevail. This policy should be read in conjunction with CENSW's Privacy Policy.

3.1 Legal and Regulatory Compliance

CCTV use and footage management at CENSW will comply with the following legislation:

- Privacy Act 1988 (Cth) - including Australian Privacy Principles
- Surveillance Devices Act 2007 (NSW) - regulates visual surveillance in premises
- Workplace Surveillance Act 2005 (NSW) - where workplace areas may be under surveillance
- Residential Tenancies Act 2010 (NSW)
- Housing Act 2001 (NSW)

3.2 Protection of Privacy Access to CCTV Footage

CENSW is committed to protecting the privacy of tenants, staff, and visitors. Any CCTV footage that reasonably identifies an individual is considered personal information and is managed in accordance with the Privacy Act 1988 (Cth) and CENSW's Privacy Policy.

All footage is securely stored and is only accessible to authorised personnel who have received appropriate training. Access is restricted to staff who require it for lawful purposes, such as responding to incidents or legal requests. This may include the CENSW Co-operative Support Officer and, where applicable, the Secretary or Treasurer of a Co-operative.

All access is logged, monitored, and periodically reviewed to ensure compliance and accountability.

CCTV will not be used to monitor tenant behaviour or to mediate minor neighbourhood disputes. Its use is strictly reserved for serious incidents or legal compliance.

3.3 Signage and Notification

To ensure transparency, clear and visible signage must be displayed at all entry points to properties where CCTV is in use. Signage must:

- state that CCTV operates 24/7
- identify CENSW as the operator.
- include a contact number for enquiries

All cameras must be visibly installed and never concealed.

3.4 Release and Retention of Footage

CCTV footage will be retained for no longer than 28 days, unless required for an ongoing investigation or legal proceeding. After the retention period, footage will be securely and automatically deleted.

All requests for access must be made in writing and directed to the CENSW Senior Leadership Team. Footage will only be released to law enforcement or as otherwise permitted by law. Under no circumstances will footage be provided to tenants, members of the public, or the media, unless legally mandated.

3.5 Supporting CCTV Use in Co-operatives

CENSW supports member Co-operatives who choose to use CCTV by:

- providing policy templates and practical guidance
- ensuring alignment with relevant legislation and governance obligations
- offering advice and assistance when Co-operatives need to access or use footage for tenancy management or incident response.

To protect tenant privacy, access to footage in Co-operatives is strictly limited to:

- officer designated by the Co-operative Board
- staff member designated by CENSW.

These individuals are authorised solely to facilitate lawful collection of footage, such as for use by police or under legal obligations. All persons with access must comply with the CENSW Code of Conduct and Privacy Policy.

Co-operatives require CENSW's permission before installing CCTV systems. If granted, Co-operatives remain fully responsible for the installation, operation, signage, storage, access, and authorised release of footage from their own CCTV systems. These systems must comply with the requirements outlined in this policy.

4 Related Legislation, Documents and Policies

- Co-operative Partnership Agreement (CPA)
- Privacy Policy
- Residential Tenancies Act 2010 (NSW)
- Housing Act 2001 (NSW)
- Privacy Act 1988 (Cth)
- Surveillance Devices Act 2005 (NSW)

5 Variations

Name and Designation of Approver	Head, Cooperative Services
Contact/Responsible Delegation	Cooperative Services Team leader
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