



# CCTV Cameras Policy

## Rationale

To assist in providing a safe physical environment a CCTV surveillance system has been installed at BIG4 Ballina Headlands Holiday Park (also known as Ballina Headlands Leisure Park). The area covered by cameras includes the Kids Zone, incorporating the Jumping Pillow, play rope, NEOS and playground equipment, the 2 pool entry gates, the Outdoor Chess, the TV Room, the Pool table and the Boom-gate and check in lanes outside Reception.

The intent of this policy is to ensure the effective, appropriate and lawful use of Closed Circuit Television (CCTV) surveillance cameras at the BIG4 Ballina Headlands Holiday Park.

A separate policy, known as our Workplace Surveillance Policy has been created for employees and contractors and is available to those individuals.

## Purpose

The purpose of this CCTV Cameras Policy is to govern the use of a CCTV system on BIG4 Ballina Headlands Holiday Park premises as an incident risk management tool under the requirements of the Work Health & Safety Act 2011 and the relevant regulations as well as the Workplace Surveillance Act 2005, and also complies with the Privacy and Personal Information Protection Act 1998.

The purpose of this policy is also to provide guidance for the appropriate installation and use of CCTV surveillance cameras and use of footage collected at the BIG4 Ballina Headlands Holiday Park.

Our CCTV system serves the following principal purposes:

- To reduce the likelihood of injury or damage to person or property through the incorrect use of park facilities;



- To reduce the likelihood of theft or damage to BIG4 Ballina Headlands Holiday Park property or assets;
- To prevent crime, misconduct and disorder by acting as a psychological deterrent to potential offenders
- To aid the detection of crime, misconduct and disorder and enable a greater proportion of crime to come to the attention of Crime Enforcement Authorities or security personnel
- To enhance the apprehension and successful prosecution of offenders by facilitating the gathering of evidence

## **POLICY DETAILS**

### **Definition of public place**

For the purposes of installation and use of CCTV surveillance cameras, the NSW law has identified a 'public place' as "a place, or a part of premises: That is open to the public, or is used by the public whether or not a payment of money or other consideration, whether or not the place or part is ordinarily open or used and whether or not the public to whom it is open consists of only a limited class of persons".

Under this definition, the BIG4 Ballina Headlands Holiday Park is considered a public place and as such, any use of CCTV surveillance in these areas must comply with various State and Commonwealth legislation, Australian Standards and other guidelines.

### **CCTV operation**

The CCTV surveillance cameras are used to capture any incidents involving threats to BIG4 Ballina Headlands Holiday Park employees or public safety, theft, and unauthorised access. The cameras operate for twenty-four hours a day, seven days a week. The majority of monitoring will be passive monitoring, however there will be occasional periods of retrospective reviews.

All reasonable steps will be taken to ensure the identity and images of any individuals captured on camera remains anonymous where lawful and practicable. Toilets, showers and change rooms shall not be subject to surveillance by the CCTV system.

Appropriate signage will be displayed at the entrances of the BIG4 Ballina Headlands Holiday Park, and below each camera within those areas, to inform

the public, including guests, visitors and homeowners, residents, also employees and contractors of the use of cameras for security purposes.

All guests, their visitors, homeowners and residents shall as a matter of course, by entering the grounds of BIG4 Ballina Headlands Holiday Park, accept that they and their children, or children they are responsible for, be subject to surveillance operating within the park grounds.

### **Definition of an incident**

An incident is defined as an occurrence or event that could result in harm to persons, property or business operations. An incident may occur at any time, and may involve members of the public, employees and contractors.

### **Camera locations**

CCTV surveillance cameras are located at the Kids Zone, incorporating the Jumping Pillow, play rope, NEOS and playground equipment, the Outdoor Chess, the TV Room, the Pool table, also both Pool/Spa entry gates and the Boom-gate and check in lanes outside Reception, encompassing the visitors' car park.

### **Purpose of collection**

Footage recorded and retained by the CCTV surveillance cameras will be used for the sole purpose of monitoring and investigating incidents.

The primary purpose of collection is:

- incident monitoring;
- detection of any public safety issues;
- detection and deterrence of theft or malicious damage; and
- monitoring any unauthorised access to areas after hours.

### **Access to footage**

Access to live streaming or recorded footage for the purposes of viewing, copying or disclosing the footage will be operated by the Park Operator and their nominated staff, with live footage being displayed in Reception on occasion as a deterrent for persons using the park facilities in an inappropriate manner.

### **Use and disclosure of footage**

Live streaming and recorded footage must only be used for the purposes of

investigating and providing evidence of an incident. Footage of an incident may be disclosed to a third party:

- Such as NSW Police for use in connection with the detection, investigation or prosecution of an offence, and copies may be provided on the condition that the third party has an official role in investigating the incident or some other legitimate reason for requiring access to the footage.
- For a purpose that is directly or indirectly related to the taking of civil or criminal proceedings
- In an instance whereby the parent or legal guardian of a child requests
- If it is reasonably believed to be necessary to avert an imminent threat of serious danger, violence or of substantial damage to property or person.

As it is in the public interest to assist law enforcement agencies to pursue their law enforcement and public protection activities, BIG4 Ballina Headlands Holiday Park will assess requests for surveillance records in the absence of a warrant on a case by case basis, seeking legal advice where required. Any request by members of the public to view records of incidents must be done through the Freedom of Information (FOI) process. In deciding whether to provide surveillance records BIG4 Ballina Headlands Holiday Park will balance this need with its own obligations of confidentiality to its clients and the sensitive nature of legal information and our responsibility to comply with the Privacy and Personal Protection Act 1998.

### **Storage of footage**

Any recorded footage of incidents will be stored in a secure location with restricted access. Footage will be protected from unauthorised viewing, copying, alteration, deletion and disclosure.

## **MONITORING, EVALUATION AND REVIEW**

This policy will be reviewed on an annual basis. The effectiveness of the CCTV system to achieve the objectives of this policy will be reviewed on a regular basis. This will include reviewing the location of the cameras to ensure they are capturing appropriate footage, the storage and disclosure of any footage, the operation and administration of the system and compliance with appropriate legislation. Minor amendments to the policy may be authorised by the Park Operator at any time where such changes do not alter the substance of the policy.