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1. Purpose

Closed-circuit television (CCTV) equipment is utilised in the common areas of WHL properties such as apartment complexes and rooming houses. The policy will guide staff to ensure CCTV equipment is utilised to accelerate security interests and comply with relevant laws and ethical obligations. This policy does not extend to the private use of security equipment by renters or the use of security equipment by Owner's Corporations in THM properties.

2. Scope

This policy applies to all WHL employees, volunteers, students, contractors, and board members that make decisions about, and deal with, CCTV equipment.

3. Use of CCTV equipment

3.1 What is CCTV?

CCTV is a form of video surveillance that enables data signals (video footage) to be transmitted from a video camera to a limited number of monitors in the form of a video recording.

3.2 Purpose of CCTV

WHL use CCTV cameras at residential premises for a few key reasons:

- The known presence of security cameras may detect and/or deter behaviour that is contrary to the Residential Tenancies Act 1997 such as interference the peace, nuisance, property damage or violent behaviours.
- CCTV cameras can capture criminal behaviour and assist police in identifying perpetrators. This preserves the safety and wellbeing of renters.
- Some WHL renters live with a risk of family violence. The use of CCTV cameras can assist to prevent and respond to any incidences of family violence that may take place on WHL managed premises. WHL can assist police by providing CCTV footage.

3.3 Use of CCTV

WHL may install CCTV cameras in the following spaces:

- common areas of rooming houses such as living areas, laundries, and kitchens
- common areas of apartment complexes such as walkways or garages
- any shared facilities in other premises
- outwardly facing entrances and exits

WHL will not install CCTV cameras that can view:

- inside a renter/resident's property or doorway
- in any spaces that would reasonably be considered private, such as bathrooms
- any part of a THM property

3.4 Privacy and security

- Any CCTV footage captured will be accessible only to relevant WHL staff, password protected and only accessed when necessary for the pursuit of security or safety purposes.
- CCTV will not be shared with the public or media outlets at any time
- CCTV footage may be shared with police to assist in a criminal investigation or submitted to the Victorian Civil and Administrative Tribunal (VCAT) as evidence for a hearing. This may result in any adjoining parties accessing the footage as a necessary means of pursuing actions under the Residential Tenancies Act 1997 (Vic).
- CCTV may be shared when required under mandatory information sharing programs, such as issues involving child protection matters.
- Retained CCTV footage will be deleted after 28 days, unless required for law enforcement reasons.

4. Relevant laws and obligations

4.1 Legal framework

Surveillance Devices Act 1999 (Vic)

- outlines the laws regarding use of surveillance equipment in certain spaces
- WHL will adhere to all relevant provisions in ensuring the protection of renters' privacy is fully realised.
- WHL will ensure that cameras will only capture footage in spaces where a person would reasonably expect to be publicly observed

Privacy Act 1988 (Commonwealth) & Australian Privacy Principles Codes ("APP Codes")

- The *Privacy Act* 1998 empowers the APP Codes to create obligations around the handling of personal and private information
- WHL will handle all CCTV footage that reasonably identifies renters/residents in compliance with these duties

4.2 Ethical obligations

It is important that the presence of CCTV equipment creates a sense of safety and security for renters/residents. WHL wants to avoid renters/residents feeling intimidated or hypervigilant around the common spaces of the premises. Therefore, WHL commit to only reviewing security footage when it is fundamentally necessary to resolve incidents that are sufficiently serious. WHL recognise the implications of surveillance and will not utilise CCTV footage to review trivial issues.

- WHL will ensure there are visible, accessible signs at relevant properties alerting renters/residents and visitors to the presence of CCTV footage.

- WHL will handle information in compliance with its internal Privacy and Confidentiality Policy.
- WHL will alert renters to the presence and purpose of CCTV at the time of sign up.

5. Reviewing

This will be reviewed routinely every two years or earlier where changes in the legislative or regulatory environment require it.

6. Related documents

- Renter Dispute Policy
- Privacy and Confidentiality Policy
- Information Technology Policy
- Victim of Crimes Charter Policy
- Family Violence Policy
- Complaints and Appeals Policy
- Renter Related Damage Policy
- Ending Long Term Tenancies Policy