



Closed Circuit Television and Record Policy

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Closed Circuit Television Monitoring and Recording Policy

1. Purpose

This policy outlines the use of video surveillance systems at Manly Life Saving Club (MLSC) to ensure the safety and security of members, visitors, staff, and facilities while respecting individual privacy rights.

2. Policy

This policy applies to all video surveillance systems operated by Manly Life Saving Club (MLSC) across and within its premises, including clubhouse, vehicle and vessel storage bays, commercial areas and any other club-owned or leased facilities. It shall be the policy of MLSC to utilize Close Circuit Television Camera's (CTV cameras) to monitor and record public areas to ensure the safety and security of the Life Saving Club community. Further, MLSC shall abide by the Manly Life Saving Club Policy for Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes.

3. Objectives

- Ensure the safety and security of members, visitors, and staff.
- Deter and prevent criminal activity and misconduct.
- Protect club property, facilities and assets.
- Provide evidence in the event of an incident or investigation.
- Respect and uphold privacy rights as mandated by local laws and regulations.
- Video monitoring for security purposes will be conducted in a professional, ethical and legal manner

4. Responsibilities

- The MLSC Board is responsible for overseeing the implementation and management of the surveillance system.
- All members, visitors, and staff must comply with this policy.
- The Director of Risk has the responsibility to authorize all CCTV monitoring for safety and security purposes at the Club. All new installations will follow Public Safety operating principles. All existing CCTV monitoring systems will be evaluated for compliance with this policy

5. Scope

This directive shall affect all MSLC Board members and staff members who use or supervise the use of the MSLC CCTV system as part of their functional role within the club. Video monitoring of public areas for security purposes will be conducted in a manner consistent with all existing Club policies, including the Non Discrimination Policy, the Sexual Harassment Policy, other relevant policies and NSW Legislative Acts and Regulations. The code of Practice for video monitoring prohibits monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.)

6. Operations, Installation and Access to Surveillance Footage

- Surveillance cameras will operate 24/7 or during specific times as determined by the MSLC Board.
- The use of CCTV equipment shall be limited to legitimate safety and security purposes, including but not limited to: Property and building protection, building perimeters, entrance and exits, storage areas, lobbies and corridors and emergency equipment storage locations. Cameras will not be set up in sensitive areas such as bathrooms.
- Appropriate signage will be established to inform the membership and public of the use of video surveillance equipment.
- The MSLC Board shall be notified of any performance or operational issues or deficiencies. The MSLC Board shall have primary responsibilities for initiating remedial action.
- Under no circumstances shall anyone, except qualified and authorised trained service technicians, attempt to service, repair, or tamper with any of the CCTV or video recording equipment.
- Access or viewing of live or recorded footage will be restricted to authorized personnel only. This is limited to the President MSLC, the Director of Risk MSLC, the Operations Manager MSLC or at the specific request from a MSLC Board member.
- Footage will only be viewed in the event of a security incident or for safety monitoring purposes.

7. Retention and Storage of Footage

- Recorded footage will be stored securely for a period of 60 days unless required for an ongoing investigation.
- After the retention period, footage will be securely deleted to prevent unauthorized access.
- In case of incidents, relevant footage may be archived and stored for a longer period as required by law.

8. Privacy and Compliance and Public Safety Responsibilities

- MSLC will comply with all relevant privacy and data protection laws, including NSW Surveillance Devices Act 2007 No 64 and the Workplace Surveillance Act 1998 as amended. All MSLC members and Officials shall be guided by these regulations and all relevant legislation related to the operation of CCTV equipment
- Any personal data captured through video surveillance will be handled in accordance with the club's data protection policies.
- Members or individuals who wish to view or request a copy of footage involving themselves may do so by submitting a formal request to, the MSLC Board, the President MSLC or the Director of Risk. Requests will be subject to privacy laws and will not compromise the security or privacy of others.

- The MLSC Board and or President, with the Director of Risk, will review all requests received by the Board, President or Director of Risk to release recordings obtained through CCTV monitoring. No releases of CCTV recordings will occur without authorization by the Director of Risk or the MLSC Board. Excluded from review by the MLSC Board are releases of files directly related to a criminal investigation, arrest or subpoena following written application from the NSW Police. The MLSC Board may also approve the release of CCTV files only for legitimate purposes, such as to protect the Club and its members from lawsuits or harm. Any release of files will be recorded on a written log and transcript within the Board minutes.

9. Use of Footage and Image storage

- Footage will be used for security, safety, and club-related investigations.
- Footage will not be shared with third parties except for law enforcement or as required by law. NSW Police are to make a formal application for footage to be released as part of an investigation.
- Only authorized management and NSW Police are permitted to review or remove files.
- Files will remain in the file storage library and only be removed by the Director of Risk. Video files will not be archived unless specifically authorised by the Director of Risk and or the MLSC Board
- Duplication of files or printing of images from video files is prohibited unless approved by the Director of Risk.
- The club will not use footage for any purposes unrelated to safety and security (e.g., marketing, broadcasting, etc.).

10. Breach of Policy

- Any breach of this policy by staff, members, or visitors may result in disciplinary action, termination of membership, or legal action as appropriate.
- Unauthorized access to, tampering with, or misuse of surveillance systems or footage will be dealt with seriously and may involve law enforcement authorities.

11. Review and Amendments

- This policy will be reviewed annually by the Director of Risk and or as required to reflect any changes in technology, legal requirements, or club operations.
- Amendments to the policy will be communicated to all members and staff in a timely manner.

Effective Date: 1st February 2025

Last Reviewed: 1st February 2025

Approved by: Manly LSC Board