



**Gulf Harbour Marine Village
Residents' Association
CCTV Policy**

Table of Contents

1. Purpose.....	3
2. Scope.....	3
3. Definitions	3
4. Purpose of Camera Surveillance	4
5. Installing Cameras	4
5.1. Positioning of Cameras	4
5.2. Types of Cameras	4
6. Public Awareness.....	5
7. Maintenance of Camera Surveillance Systems.....	5
8. Incident Reporting	5
9. Access To Images By Individuals.....	5
10. Access To Images By Third Parties	6
11. Security of Camera Footage.....	6
12. Retention and Disposal.....	6

Document Information

Document Name	Gulf Harbour Marine Village Residents Association CCTV Policy	
Document Owner	Gulf Harbour Marine Village Residents Association	
Approved by	Privacy Committee	Date: 18/02/26

Revision History

Version	Approved By	Description of changes

1. Purpose

Because camera surveillance systems may capture images of people, which can be used, stored, manipulated and disseminated, those who operate the systems need to be aware of how to manage privacy issues so that we meet our legal obligations under the Privacy Act. This policy aims to support best practices around usage of CCTV.

The purpose of this policy is to outline how the camera surveillance system will operate at GHMVRA and to outline the mechanisms that will protect the privacy of individuals.

2. Scope

This policy applies to all Committee Members, employees and contractors of GHMVRA. This policy also applies to all vendors who manage personal information on behalf of GHMVRA.

3. Definitions

Term	Definition
Footage	Video or audio recordings captured by CCTV cameras
Personal Information	Any information which tells us something about a specific living individual. The information does not need to name the individual, as long as they are identified or identifiable in other ways, like through their movements, address or email address. Information about sole traders and companies can be considered personal information in some circumstances if it relates to an individual.
Privacy breach	An event where personal information is either inappropriately: • Disclosed • Altered • Lost - This includes either the destruction of information or inability to be able to access it. • Accessed.
Privacy Complaint	A complaint relating to the collection or handling of personal information including any notice, investigation or other action from the Office of the Privacy Commissioner.
Privacy Officer	The person(s) responsible for all privacy related matters at GHMVRA, monitoring compliance, acting as the contact for the Office of the Privacy Commissioner for breach notification, complaints and other enquiries and to ensure GHMVRA complies with the provisions of the Privacy Act.
Privacy Request	A request made by an individual to exercise any rights under the Privacy Act.
Vendor	A third party who completes actions on behalf of GHMVRA.

4. Purpose of Camera Surveillance

The purpose of the camera surveillance system at GHMVRA is to enhance security, protect assets, and ensure the safety of Members, visitors, and property. It is also used to reduce criminal events such as violence, theft and property damage.

Therefore, camera surveillance may be used for the following purposes:

- Deterring criminal events, objectionable behaviours and safety incidents occurring whilst on GHMVRA property
- Detecting criminal events, objectionable behaviours and safety incidents occurring on GHMVRA property
- Collecting evidence for prosecution of criminal events occurring whilst on GHMVRA property

Footage from the camera surveillance system can only be used for the purpose for which it was collected. Camera footage must only be downloaded in response to an incident, privacy request or legal request.

5. Installing Cameras

5.1. Positioning of Cameras

Cameras must be positioned to ensure they only collect information required (for example if you are monitoring the boats, they should not also include images of people walking on the path).

If private property (including areas under GHMVRA control that are leased to others) is included within the images you must have obtained the permission of the property owners.

5.2. Types of Cameras

The appropriate kind of camera must be selected to ensure the capabilities do not exceed the required purpose of utilising a camera.

Intelligent surveillance technologies such as facial recognition and number plate recognition must not be used.

Audio should not be collected at any time.

6. Public Awareness

To increase public awareness of GHMVRA surveillance camera usage the location of cameras must be clearly apparent with signage in the immediate vicinity of each camera detailing the purpose of the camera system and the fact it is being operated by GHMVRA.

7. Maintenance of Camera Surveillance Systems

GHMVRA's Privacy Officer(s) are responsible for checking that the cameras are operating correctly, monitoring access and are appropriately positioned. The Treasurer/Secretary is responsible for provisioning.

Any third party who has access to the system for support reasons must have a contract with GHMVRA and be approved by GHMVRA's Privacy Officer(s).

8. Incident Reporting

Incidents may be identified by GHMVRA committee members, residents, members of the public or other agencies such as the Police.

When incidents are identified:

- Video of incidents may be transferred to secure media for storage (with both a master copy and working copy). There must be restricted access to these files.
- Details of every incident recorded will be documented and provided to GHMVRA's Privacy Officer.

GHMVRA's Privacy Officer(s) will advise if the incident should be reported to the relevant authorities.

9. Access To Images By Individuals

Any individual who is recorded by the surveillance cameras has the right to access that footage.

Any request by an individual to access footage will be assessed in relation to the ability to readily retrieve the footage and to maintain the privacy of any other identifiable individual in the footage. Where footage exists but is not able to be released due to issues with de-identifying others contained within the footage, a written record of the incident will be made available. Initial enquiries relating to access to images or information should be addressed to GHMVRA's Privacy Officer.

10. Access To Images By Third Parties

In the event of some unlawful activity being carried out, and that activity being recorded on the surveillance cameras, GHMVRA may pass the footage of that incident over to Police for the purpose of an investigation. Likewise, if the Police believe some unlawful activity was carried out that may have been recorded by GHMVRA then they may view or ask them to hand over any footage that may help in their investigation.

Any requests for access to images by third parties must be directed to the GHMVRA's Privacy Officer(s).

11. Security of Camera Footage

Footage must be secured to lessen the possibility of its loss, inappropriate access or disclosure. Safeguards include:

- Viewing footage in areas where they cannot be readily seen by members of the public and all staff.
- Limiting access to only authorised staff.
- Prohibiting removal of footage from the system unless approved by the GHVRA's Privacy Officer(s).

12. Retention and Disposal

Camera footage must be deleted after 60 days. Only authorised staff can make copies of recordings, and copies are kept for a limited time in a secure manner.