

SURVEILLANCE CAMERA POLICY

1. PURPOSE

This policy governs Queensland Urban Utilities' use of both permanent and temporary surveillance cameras at its commercial and operational sites, as well as other locations where it undertakes business activities.

2. APPLICABILITY OF POLICY

This is an operational policy, which is for internal and external use (and will be made available on our external website).

This policy commences from the date approved by the Chief Executive Officer.

3. SCOPE

This policy governs Queensland Urban Utilities' use and location of surveillance cameras and the subsequent recording, monitoring, storage, access and use of recorded material.

This policy applies to any person, whether an employee, contractor, service provider, member of the public or otherwise to the extent the person or an activity being undertaken by the person is captured by surveillance cameras when on or near a Queensland Urban Utilities site or location in which Queensland Urban Utilities is undertaking authorised activities.

For clarity, this policy does not cover camera inspections undertaken in order to assess the condition of assets where no person or personal information is identifiable.

4. RELATED LEGISLATION

- *Criminal Code Act 1899* (Qld) and Criminal Code
- *Crime and Corruption Act 2001* (Qld)
- *Information Privacy Act 2009* (Qld)
- *Invasion of Privacy Act 1971* (Qld)
- *Planning Act 2016* (Qld)
- *Public Records Act 2002* (Qld)
- *Right to Information Act 2009* (Qld)
- *South East Queensland Water (Distribution and Retail Restructuring) Act 2009* (Qld)
- *Water Supply (Safety and Reliability) Act 2008* (Qld)
- *Work Health and Safety Act 2011* (Qld)

5. POLICY STATEMENT

Queensland Urban Utilities is committed to ensuring the safety and security of its employees, contractors, visitors and members of the public as well as the protection of its assets. Queensland Urban Utilities also recognises, however, that this must be balanced against an individual's right to a reasonable expectation of privacy and accordingly is committed to ensuring that any personal

information it collects is dealt with in accordance with the *Information Privacy Act 2009* (Qld) and the Information Privacy Principles.

5.1 Surveillance camera locations

Queensland Urban Utilities uses surveillance cameras on a permanent and temporary basis, in order to monitor and record activity in the following locations:

- Reception areas at its commercial premises
- Sewage treatment plants
- Pump stations and booster stations?
- Depots
- Reservoirs
- Other Queensland Urban Utilities assets
- Temporary sites when undertaking responsive or maintenance activities (i.e. repairing a burst main)
- Queensland Urban Utilities stalls at community events

Queensland Urban Utilities will consider the privacy of individuals when determining the location of each camera installed, to prevent or minimise recordings of passers-by or another person's private property. Adequate signage will be placed at each camera location to alert individuals to the camera's operation.

Queensland Urban Utilities will maintain a register of all surveillance cameras and associated monitoring equipment together with its capabilities and camera locations.

5.2 Surveillance camera purposes and use

The purpose of Queensland Urban Utilities surveillance camera monitoring and recording is:

- to provide a safe and secure work environment for individuals on Queensland Urban Utilities premises or where ever Queensland Urban Utilities may be undertaking business or community related activities;
- to deter unlawful property damage to Queensland Urban Utilities assets and to assist in identifying offenders;
- to deter unlawful, aggressive or harmful behaviour and to assist in identifying offenders;
- to manage operational network performance;
- to assist in identifying, addressing and enforcing third party compliance obligations under Queensland Urban Utilities Third Party Compliance Function.

Queensland Urban Utilities will ensure video monitoring of public areas for security purposes within, or adjacent to, Queensland Urban Utilities premises or temporarily occupied sites is limited to uses that do not violate the individual's reasonable expectation to privacy.

Should an incident occur, recordings may be provided as evidence to law enforcement agencies, such as the police, to assist with enquiries, investigations or prosecutions.

Surveillance cameras and video footage is not used to monitor staff performance, however, they may be used to investigate allegations of misconduct by employees or contractors.

5.3 Storage and security of recordings

Live viewing of surveillance footage may be undertaken by authorised employees for monitoring purposes, however viewing of stored footage is by application only.

Images recorded by surveillance cameras are securely stored and are only accessible by authorised employees. The digital files are generally stored for up to 60 days after which they are programmed to be automatically erased unless required for law enforcement purposes, pursuant to Queensland Urban Utilities Third Party Compliance Function or in relation to a specific business incident identified within the retention period (i.e. regulatory compliance matter such as a work health and safety or environmental incident). Controlled access to the secured footage is strictly maintained and a log of access kept.

Copies of recordings will not be made for other purposes unless they are relevant to the purpose of surveillance or are required by law. Any copies made are logged and stored in a securely lockable area.

5.4 Third party access to recordings

Recordings may be shown or released to a third party in the following circumstances:

- to the police or other law enforcement agencies in relation to criminal or unlawful acts;
- to a regulator (i.e. Workplace Health & Safety Officer or Environment Officer), in relation to the investigation of a regulatory offence;
- to a Queensland Urban Utilities Insurer;
- as required to enable or assist Queensland Urban Utilities in the performance of Third Party Compliance Function;
- as required in order for Queensland Urban Utilities to pursue, defend or otherwise participate in an action or proceeding before a court, tribunal, commission of enquiry or other dispute resolution body;
- when otherwise allowed or required by law (i.e. pursuant to a court order).

Recordings may also be accessed by:

- data subjects (or authorised representatives) pursuant to an access request under the *Information Privacy Act 2009 (Qld)*;
- individuals (or authorised representative) pursuant to an access request under the *Right to Information Act 2009 (Qld)* or a court order;
- Queensland Urban Utilities management or legal representatives in relation to an alleged incident of serious misconduct by a Queensland Urban Utilities employee or contractor.

5.5 Security contractors/companies

Queensland Urban Utilities will ensure that any third party contractor or service provider who has access to, or control of, a security system or surveillance camera on behalf of Queensland Urban Utilities is bound by and subject to this policy (or such other policy that provides at least the same or better protections), and relevant laws and regulations relating to the protection of personal information and data.

5.6 Privacy impact assessments

Prior to the installation or relocation of a new or temporary surveillance camera or system, Queensland Urban Utilities will undertake a privacy impact assessment to ensure privacy compliance and identify better practice.

6. DEFINITIONS

Personal information: is information or an opinion, including or information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, as defined in the *Information Privacy Act 2009* (Qld).

Surveillance camera: includes any equipment, fixed or temporary, used to observe and record images of individuals, such as closed circuit television (CCTV), temporary or fixed cameras, body-worn video and drones.

Third Party Compliance Function: means Queensland Urban Utilities' role in identifying, addressing and enforcing compliance obligations that apply to third parties (excluding Queensland Urban Utilities employees or contractors) under key legislation regulating Queensland Urban Utilities water and wastewater business, in circumstances where the third party's non-compliance with their obligations impact on Queensland Urban Utilities.

7. RELATED DOCUMENTS

- Queensland Urban Utilities Protective Security Policy
- Queensland Urban Utilities Application for Release of CCTV Footage
- Queensland Urban Utilities Asset Management Policy
- Queensland Urban Utilities Code of Conduct
- Queensland Urban Utilities Complaints Management Policy
- Queensland Urban Utilities ICT Acceptable Use Policy
- Queensland Urban Utilities ICT Security Policy
- Queensland Urban Utilities Information Privacy Policy
- Queensland Urban Utilities Information Management Policy
- Queensland Urban Utilities Information Access and Protection Policy
- Queensland Urban Utilities Recordkeeping Policy
- Queensland Urban Utilities Risk Management Policy
- Queensland Urban Utilities Third Party Compliance Framework

8. REVIEW DATE

This policy will be reviewed every 2 years or in accordance with changes to relevant legislation or business objectives.

9. AUTHORISING OFFICER

LOUISE DUDLEY
Chief Executive Officer
Queensland Urban Utilities