

# Closed Circuit Television (CCTV) Protocol

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## Purpose of this policy

The purpose of this Closed-Circuit Television (CCTV) Protocol, also known as Code of Practice, is to establish guidelines for the installation, operation, and management of CCTV systems within Sydney Olympic Park. The primary objectives of this policy are to enhance security, promote safety, deter criminal activity, and protect the privacy rights of individuals.

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## To whom this policy applies

This policy applies to all employees, consultants and contractors of the department. It also applies to employees, consultants and contractors of all departmental entities that have people employed in or through the department.

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## Policy statement

CCTV can be effective in reducing crime if it is part of a broader crime prevention and community safety strategy. CCTV is not recommended as an isolated response to addressing crime in public places. CCTV can bring benefits to the community through a reduction in crime, which can lead to enhanced perceptions of safety in a particular area. CCTV programs that have the greatest impact on crime in a local area are those implemented as one part of a suite of crime prevention measures as opposed to as a stand-alone crime prevention intervention. CCTV schemes should always be operated with respect for people's privacy and their right to conduct or engage in lawful activities.

The Sydney Olympic Park Precinct comprises a number of sporting, entertainment and exhibition venues, public transport terminals, and car parks as well as having extensive public areas, including parklands and residential towers. A comprehensive CCTV system has been installed to enhance the operational controls to the precinct and assist in the coordination of traffic and transport.

The CCTV system has been designed to satisfy the dual purpose of precinct management and public/property safety and security as follows:

- a) To provide an effective means by which to prevent and reduce criminal activity in a monitored area via an increased fear of detection and apprehension on the part of the offenders.
- b) Improve the public's general feeling of safety and security with regards to the monitored areas.
- c) Provide accurate identification of offenders and events whilst an incident is occurring.

- d) Allow for monitoring of traffic flow within the Sydney Olympic Park area and surrounding roads.
- e) Monitoring of pedestrian and vehicle traffic to facilities and venues within Sydney Olympic Park area.
- f) Monitoring of car parks, car park pay stations, public/private transport movements, and the monitoring of the public domain areas within the Sydney Olympic Park Precinct.
- g) Monitoring anti-social behaviour and safety within SOPA Sports Venues and public places surrounding SOPA sports Venues.

## Operating Principles

The Authority ensures:

- a) The recording and retention of recorded media is undertaken fairly and lawfully,
- b) People are aware that they may be subject to CCTV system surveillance,
- c) That the CCTV system surveillance is not used to monitor or track individuals in a gratuitous or unreasonable manner,
- d) The CCTV system surveillance is not used for general intelligence gathering,
- e) The information gathered is not used for any other purpose than proclaimed, and
- f) The owners of the CCTV system are clearly identified and accountable for its operation.

The Authority's use, management, and monitoring of public spaces, within SOPA Venues and within car parks comply with the principles following.

### *Principle 1 - Lawful*

The Sydney Olympic Park CCTV system will be operated fairly, within applicable law, and only for the purposes for which it is established or which are subsequently agreed in accordance with this Protocol. Operation of the Sydney Olympic Park CCTV system will comply with the Privacy and Personal Information Protection Act 1998, Workplace Surveillance Act 2005, and the Surveillance Devices Act 2007. This will apply to all SOPA employees or contractors employed or engaged by, Sydney Olympic Park, within Sydney Olympic Park.

### *Principle 2 – Direct*

The CCTV system will be operated with due regard to privacy and civil liberties of the individual members of the public. Tracking of or zooming in on members of the public will only be done when:

- a) Person(s) are behaving in a manner likely to cause a disturbance to the general public,
- b) There is a reasonable suspicion that persons are conducting illegal activities (or activities in contravention of the Sydney Olympic Park Authority Act 2001).
- c) There is a concern for the safety and welfare of persons on the site.

All operators will be made aware, as part of their training that the CCTV system operation may be audited, and that they may be called upon to account for their actions.

### *Principle 3 – Open*

CCTV Footage is captured 24 hours a day, 7 days per week for the purpose specified in this policy.

The public will be provided with clear and easily distinguishable information in relation to the operation of CCTV system at Sydney Olympic Park by:

- a) Clearly visible signs displayed throughout key areas of Sydney Olympic Park, including within monitored venues stating that the CCTV system is operating, these signs will:
- b) Informing the public that the CCTV system is in operation,
- c) Allowing people entering the area to make a reasonable assumption of the area covered by cameras, and
- d) Identify the Sydney Olympic Park Authority as the owner and provide a telephone contact number.

Only staff with responsibility for using the equipment will have access to operating controls within the SOPOC and SOPA Sports Venues. Cameras will not be used to look into premises or buildings, unless it is explicitly for following (in real time recording) participants of a crime, which originated in the public domain.

No sound will be recorded in a public place.

“Dummy” cameras will not be used within Sydney Olympic Park unless with written approval from the Director Place Management. All Operations Centre staff are to be made aware that recordings are subject to routine audits and that they may be required to justify their interest in a member of the public or premises.

#### *Principle 4 – Relevant*

The CCTV system in place within Sydney Olympic Park is such that once captured cannot be altered in any way. The footage includes embedded date and time markers. Footage will only be retained when relevant to conditions specified under Principle 3. Tracking of or zooming in on members of the public will only be done when:

- a) Person(s) are behaving in a manner likely to cause a disturbance to the general public,
- b) There is a reasonable suspicion that persons are conducting illegal activities (or activities in contravention of the Sydney Olympic Park Authority Act 2001), or
- c) There is a concern for the safety and welfare of persons on the site.

All operators will be made aware, as part of their training, that the CCTV system operation may be audited, and that they may be called upon to account for their actions.

#### *Principle 5 – Secure*

The Sydney Olympic Park Authority has primary responsibility for the introduction, implementation, and compliance with:

- a) this CCTV Protocol ;
- b) SOPA CCTV accountability and auditing;
- c) Secure access to the SOPOC and the SOPA Venues control rooms area are controlled via a proximity identification card for authorised staff or approval from the Senior Safety and Security Officer, for the SOPOC and SOPA Venue, for access by visitors and non-authorised personnel;
- d) Access to CCTV controls within monitored SOPA Venues is restricted via secure room access and sign-in procedures;
- e) Maintenance, management, security of SOPA CCTV systems by approved contractors; and

Access to the SOPOC will be restricted to authorised operating staff and managers of the SOPOC. The SOPOC will be protected from unauthorised access at all times. Access to the SOPOC will be restricted to authorised staff and persons involved in the management of the system via an identifiable proximity card with access control. Personnel who do not have this access control will not be able to access the SOPOC unless authorised by the Senior Safety and Security Officer.

All visitors to the SOPOC will have to enter via the Sydney Olympic Park Ranger area and sign the appropriate visitors register before entry will be granted.

There are a number of GUI Client Servers throughout the organisation, which have access to the CCTV system, these servers are located at Senior Safety and Security Officers desk, and P1 Pay Station office. Each of these servers has access to the CCTV system. Access is restricted to authorised SOPA staff and contractors and is controlled through network user ID and password control.

### *Principle 6 – Transparent*

Footage is not retained beyond the period specified in this policy unless extracted for law enforcement, security, safety or by request from a member of the public (or representative) under GIPA. Footage is retained for the period specified under the NSW State Records Authority approved Retention and Disposal Authority - Administrative Records (GA28) available at <https://staterecords.nsw.gov.au/recordkeeping/guidance-and-resources/records-retention-and-disposal-authorities> in a manner that does not allow the reproduction of any of the recorded material.

### *Principle 7 – Accessible*

Footage may be requested by the public as specified in this policy. Access will be provided to members of the public under GIPA as an informal application where:

- a) the request is made by the member of the public the footage relates to;
- b) third persons have written and signed agreement from the person the footage relates to for the footage to be released, or
- c) requested as a formal GIPA access

Access will be provided to police, security and law enforcement agencies via the Authority's Precinct Operations unit within the Place Management Division by contacting 9714 7300. All requests are to include the following details:

- a) Incident Location;
- b) Incident Time;

- c) Incident duration;
- d) Name;
- e) Contact telephone; and
- f) Contact email

Law enforcement and security agencies are to complete a Release Form for a copy of CCTV Images providing the details above and following:

- a) Requesting officer's name;
- b) Rank and registered number;
- c) Requesting officer's station/branch;
- d) Collecting officer's name;
- e) Collecting officer's rank and registered number;

All requests will be actioned within the guidelines required under the GIPA legislation.

#### ***Principle 8 – Correct***

CCTV footage captured, and if where stored, is captured in real-time and cannot be edited or modified in any way. Details of person's captured in footage are not appended to footage. Personal information captured in relation to extracted footage is incidentally retained with the as part of the request for the footage.

#### ***Principle 9 - Accurate***

Information stored will be accurate, relevant and not exceed that necessary to fulfil the purposes of the CCTV system.

When an operator identifies an actual emergency or incident to which a response is required the operator must contact the relevant emergency services and or SOPA Duty Manager who will provide further direction as required. Recording of the incident is to continue. If possible the incident must continue to be recorded up to and including the completion of the response.

Whenever a response is deemed appropriate to an identified incident, the operator must record the following information:

- a) Type of incident, including description,
- b) Date and Time of incident,
- c) Organisation responding to incident,
- d) Nature of response, (caution, arrest, intervention),
- e) Outcome (if available).

The incident report must record information, which will assist the police in the recording of the incident.

In the event of a “Duress Alarm” being activated within a car park, cameras located within the immediate area will automatically become active and pan to predetermined locations.

Doors that are alarmed upon opening will activate the CCTV Camera in the nearest location.

CCTV Footage captured is accurate as at the time captured and cannot be edited or modified in any way.

#### *Principle 10 - Limited*

The retention of, and access to tapes, photographs and recorded material will be for the purposes provided by this Protocol. Tapes, photographs, and recorded material will be continually retained for a period of 90 days. Recorded material will only be retained for a period exceeding 90 days if they are required in relation to the investigation of crime, for court proceedings, provided under GIPA or if required for essential Authority purposes.

Access to and / or copies of media will be provided under the following circumstances:

- a) Access to and use of recorded media by parties’ external to the Authority will only take place in conjunction with the needs of the NSW Police Service only in connection to a crime or investigation.
- b) Recorded media will only be released to a police officer if a signed request from has been completed is received for the release within 80 days. If a signed request is not received the recorded media is to be returned to the rotation group of media.
- c) If in the case that a release is approved, only a copy of the requested media is provided.
- d) The showing of recorded media to the public will only be allowed in accordance with police requirements in connection to an investigation of crime or in any other circumstances provided by law.

- e) Recorded media may be used for training conducted in the SOPOC.
- f) Appropriate security measures are to be taken against unauthorised access to, alteration, disclosure, and accidental loss and destruction of recorded media.

### *Principle 11 - Restricted*

The public interest in the operation of the CCTV system will be recognised by ensuring the security and integrity of operational procedures. Operational procedures for the use of the system have been developed and documented.

Training in the procedures is provided to all operators. The Manager, Precinct Operations will undertake regular informal audits of the operators within the Place Management team and SOPA Venue Management will undertake informal audits of their respective teams to ensure that they are complying with the procedures.

### *Principle 12 - Safeguarded*

SOPA is accountable for the effective operation and management of the CCTV system through established audit procedures with regards to taped and recorded media. These audits will be conducted internally by the Senior Safety and Security Officer (precinct cameras), Senior Parking Contracts Officer (car park cameras) and SOPA Venue Management (venue cameras) who will conduct audits on the recorded media quarterly, reporting to the Manager, Precinct Operations.

This procedure will promote public confidence in the use of the CCTV system at Sydney Olympic Park by ensuring that its operations are transparent and undergoing constant internal scrutiny and review.

## **System Design**

The CCTV system monitoring public places and car parks incorporates approximately 205 fixed and moveable cameras via a fibre-optic cable network to the Sydney Olympic Park Operations Centre (SOPOC) located at 1 Edwin Flack Avenue, Sydney Olympic Park. Images are transmitted live to observation screens monitored 24 hours a day by the Sydney Olympic Park Authority Rangers.



The CCTV system installed within SOPA Sports Venues comprises both fixed and movable cameras. SOPA Sports Venues with installed cameras are:

- a) Sydney Olympic Park Aquatic Centre and surrounding areas including playground(s) and car parks
- b) Sydney Olympic Park Athletic Centre including tracks and entrance courtyard and man gates;
- c) Sydney Olympic Park Sports Halls and front entrance
- d) Sydney Olympic Park Hockey Centre including hockey fields, front entrance and courtyards
- e) Sydney Olympic Park Sports Centre including car parks and entrances
- f) Sydney Olympic Park Archery Centre.

Images are monitored by the respective SOPA Sports Venue and images from some cameras can also be viewed at the SOPOC.

All cameras in the precinct, SOPA Sports Venues and car parks are of colour resolution, a mixture of cameras with fixed focal lengths and cameras with panning, tilting and zoom capabilities enable effective monitoring of the site.

### **Storage of Images**

All images captured by the CCTV system monitored by SOPOC are routinely recorded digitally and retained for a period of 90 days and then erased unless required for special purposes. Approval to retain images for special purposes must be given by the Director, Place Management or as requested by NSW Police, law enforcement agencies and other government agencies such as ASIO, Safe Work NSW & Transport for NSW.

All images captured by the CCTV system at SOPA Sports Venues are routinely recorded digitally and subject to the specific venue, retained for a period of up 90 days or some Venues between 24 hours to two weeks.

### **Camera Locations**

Cameras monitoring public places are located throughout the length and breadth of the Sydney Olympic Park Precinct. A detailed plan of the camera locations is displayed within the SOPOC. The detailed location plan is not available to the public for the following as the release of the plan could:

- a) increase the likelihood of, or prejudice the prevention of, preparedness against, response to, or recovery from, a public emergency (including any natural disaster, major accident, civil disturbance or act of terrorism),
- b) endanger, or prejudice any system or procedure for protecting, the life, health or safety of any person,
- c) endanger the security of, or prejudice any system or procedure for protecting, any place, property or vehicle.

The plan is not to be made available to staff and / or contractors without prior written approval from the Director Place Management

## Signage

Appropriate signage in monitored public places is displayed throughout the Sydney Olympic Park Precinct including Pay Station areas. A sample of the sign is displayed below.



Similar signage is displayed within monitored venues.

## Requesting Footage

All requests for access to or copies of footage can be made via the Department of Planning's Government Information Privacy Access (GIPA) process at <https://www.environment.nsw.gov.au/about-us/access-to-information>.

## Complaints

Complaints regarding the utilisation of the CCTV system at Sydney Olympic Park should be directed to the Director, Place Management.

The Privacy and Personal Information Protection Act 1998 authorises the Office of the Privacy Commissioner to receive and investigate complaints regarding alleged violations of privacy. Any information distributed about the scheme should advise members of the community that they are to lodge a complaint to Privacy NSW.

## Contact Officer

Any enquiries relating to this Sydney Olympic Park Authority Policy should be addressed to the Manager, Precinct Operations or Senior Safety and Security Officer.

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## Failure to comply with this policy

If you fail to comply with this policy, corrective action may be taken in accordance with the Code of Ethics and Conduct. All employees, and others covered by the code, are expected to adhere to the ethical and behaviour standards outlined in the code.

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## Review timeframe

SOPA will review this policy no later than 3 years from the date the document is approved. The document may be reviewed earlier in response to post-implementation feedback, changes to legislation, or as necessary.

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## Related documents

- [Government Information \(Public Access\) Act 2009 \(also known as GIPA\)](#)
- [Privacy and Personal Information Protection Act 1998](#)
- [https://environmentnswgov.sharepoint.com/sites/DPE-LegalAndGovernance/SitePages/Compliance/InformationAccess\(GIPA\).aspx](https://environmentnswgov.sharepoint.com/sites/DPE-LegalAndGovernance/SitePages/Compliance/InformationAccess(GIPA).aspx)

## Policy metadata

Table 1. Policy metadata

Category	Description
Status	Final
Date of approval	September 2023
Approver	Susan Skuodas, Director, Place Management and Stakeholder Engagement
Group	Sydney Olympic Park Authority
Division	Place Management
Policy owner	Michael Copping Manager, Precinct Operations
Branch	Precinct Operations
Document location	SOPA intranet and website
Next review date	January 2026
Associated procedure	N/A
Any additional applicability	N/A
Superseded document	SOPA Policy POL16/1
Further information	<a href="mailto:susan.skuodas@sopa.nsw.gov.au">susan.skuodas@sopa.nsw.gov.au</a>
Document Reference	F02/85

## Version control

Table 2. Version Control

Version	Date issued	Change
1	October 2005	
2	May 2007	Updated

Version	Date issued	Change
2.1	November 2012	Reviewed
2.2	February 2014	Reviewed Manager, Information & Records
3	February 2015	Reviewed Privacy Coordinator
3.1	June 2018	Reviewed Privacy Officer
3.2	January 2022	Reviewed Senior Manager, Operations
3.3	August 2023	Reviewed and updated to DPE format by Manager, Precinct Operations

# Appendices

## Appendix 1 – Definitions

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Table 1 - Definitions

<b>Closed Circuit Television (CCTV)</b>	Closed circuit television is defined as a television system that transmits images on a “closed loop” basis, where images are only available to those directly connected to the transmission system. The transmission of closed circuit television images may involve the use of coaxial cable, fibre-optic cable, telephone lines, infra-red and radio transmission systems.
<b>Commercial Car parks</b>	P1, P2, P3, P4, P5, P6, P7 and P8
<b>SOPA Reception</b>	Level 8, 5 Olympic Blvd, Sydney Olympic Park NSW 2127
<b>Sydney Olympic Park</b>	Means the area specified in Schedule 1 of the Sydney Olympic Park Authority Act 2001 No 57
<b>SOPA Sports Venues</b>	Sydney Olympic Park Aquatic Centre Sydney Olympic Park Athletic Centre Sydney Olympic Park Archery Centre Sydney Olympic Park Sports Centre Sydney Olympic Park Sports Halls Sydney Olympic Park Hockey Centre
<b>Sydney Olympic Park Operations Centre (SOPOC)</b>	Sydney Olympic Park Operations Centre is located at 1 Edwin Flack Ave, Sydney Olympic Park. All CCTV images are transmitted back to the SOPOC monitors and recording equipment. Camera movements are controlled from the SOPOC. The facility is staffed 24 hours a day 7 days a week.
<b>Video Surveillance</b>	Video surveillance is defined by a closed circuit television system for direct visual monitoring and /or recording of activities on premises or in a place.