

## POLICY C7.0

### SURVEILLANCE IN THE WORKPLACE

#### 1.0 INTRODUCTION

##### 1.1 Context

In the provision of their business, including higher education, vocational education and bespoke courses for industry, Scentia and its subsidiaries, the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), (collectively ‘the Scentia Group’) are committed to the safety and wellbeing of their staff and the provision of quality services to their clients. One way to facilitate this is to use legal surveillance to gather information.

##### 1.2 Purpose

The purpose of this policy is to provide the principles under which the Scentia Group employs surveillance in the workplace to gather information.

##### 1.3 Scope

This policy applies to surveillance in academic and non-academic work areas across the Scentia Group. This policy applies to staff of the Scentia Group.

For the purposes of this policy, the term ‘staff’ will include the people defined as ‘Workers’ in the Fair Work Act 2009 - employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees and outworkers.

##### 1.4 Scope Exceptions

This policy does not apply to Third-Party Partners (TTPs) unless they employ surveillance in the workplace.

#### 2.0 RESPONSIBILITIES

1. The Chief Executive Officer is responsible to ensure surveillance recording is carried out in accordance with commonwealth and state legislation.
2. The Chief Executive Officer is also responsible to ensure that staff are informed of the surveillance and how it is used.
3. All Scentia Group staff are responsible to comply with this policy.

## 3.0 POLICY

### 3.1 Principles

1. Surveillance recordings are used to ensure the security and wellbeing of staff.
2. Surveillance recordings may also be used to monitor customer service standards and staff performance, as well as for training purposes.
3. The Scentia Group ensures that it complies with all relevant legislative requirements when making, storing, acting on and releasing surveillance recordings.
4. Surveillance recordings are securely stored in line with Scentia's Privacy of Staff Information and Records Policy and the Australian Privacy Principles.
5. Surveillance recordings obtained of staff engaging in behaviour which is unlawful, or otherwise in breach of their employment contract and /or Scentia Group policy may result in disciplinary action, up to and including termination of employment.
6. Surveillance recordings may be viewed only by authorised persons as allowed under commonwealth and state legislation. Authorised persons are the Chief Executive Officer and the Head of People and Culture.
7. Surveillance recordings are not released to any outside authority unless consent of the Chief Executive Officer is given and release is lawful under state and commonwealth legislation.
8. Grievances and complaints under this policy are managed in accordance with the Staff Grievances Policy.

## 4.0 DEFINITIONS

- **Surveillance** - Surveillance is the monitoring of behaviour, activities, or information for the purpose of information gathering, influencing, managing, or directing.

## 5.0 REFERENCES AND ASSOCIATED INFORMATION

- Australian Privacy Principles
- Fair Work Act (2009)
- Privacy Act 1988 (Cth)
- Workplace Surveillance Acts - State acts
- Surveillance Devices Act 2004, with Amendments 2018 (Cth)
- Telecommunications (Interception and Access) Act 1979 (Cth)

*Note: This policy does not have a procedure.*

## 6.0 POLICY OWNERSHIP

Policy Owner	Head of People and Culture
Status	Revised on July 2021
Approval Authority	Chief Executive Officer
Date of Approval	25/02/2022
Effective Date	25/02/2022
Implementation Owner	Head of People and Culture
Maintenance Owner	Head of People and Culture
Review Due	February 2025
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## 7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C7.0	25/02/2022	Head of People and Culture	New proforma. Clause added on release of recordings. Clause added on only authorised persons permitted to view recordings. Responsibilities added. Additional References added.