

Darwin Turf Club/Thoroughbred Racing Northern Territory

OPTICAL SURVEILLANCE DEVICES POLICY

About this Policy

Version 1.1, March 2019

The Darwin Turf Club and Thoroughbred Racing Northern Territory (TRNT) are committed to providing quality services to you. This policy outlines the use and operation of Optical Surveillance Devices on Bevan Halter Avenue and in the race day stalls in the Darwin Racing's premises at Dick Ward Drive, Fannie Bay NT 0820 ("The Premises"). Darwin Turf Club and TRNT employees, TRNT Licence holders or stakeholders of Darwin Racing should also refer to the "*Surveillance Devices Privacy Policy*" and the Australian Privacy Principles for further information about the collection, holding and use of personal or sensitive information.

The specific legal obligations of the Darwin Turf Club and TRNT through the use of optical surveillance devices are outlined in the *Surveillance Devices Act (NT)* and the *Surveillance Devices Act (Cth)*. This policy will be updated when there are changes made to the surveillance devices or security systems. Updates will be published on our website and through our email lists to all those who will be affected by the changes.

A copy of this policy can be provided upon request to all those who are authorised to enter the Premises

Overview

The Darwin Turf Club and TRNT utilise a 24-hour system of optical surveillance devices installed around the stables area at Bevan Halter Avenue, in the Race Day stalls and in the swabbing facility. It is expected that Personal Information and Sensitive Information will be collected through the use of these devices and disclosed in accordance with the "*Surveillance Devices Privacy Policy*".

Anyone attending the Premises may regularly be the subject of surveillance; this includes Thoroughbred Racing NT employees, TRNT licence holders, Darwin Turf Club employees or any other stakeholder attending the Premises.

Optical Surveillance Devices

There are a number of optical surveillance devices installed around the Premises. These devices have different viewing ranges, some are limited to a 180 degree view in the direction the device is facing, while others, in strategic locations have access to a full 360 degree scope.

There are three types of optical surveillance devices installed at the Premises:

1. CCTV_PTZ;
 - a. These devices are installed on external poles monitoring the traffic access and road activity along Bevan Halter Avenue.
2. CCTV_Bullet;
 - a. These devices are installed strategically on the exterior of most of the stable buildings along Bevan Halter Avenue. They will have a 180 degree view over the entry and exits to the stables. These devices are also installed in the race day stalls.

3. CCTV_360

- b. These devices have a 360 degree view and are installed on the exterior of certain stable buildings that are unable to accommodate installation of the other types of optical surveillance devices listed in this policy. These devices are also installed in the swabbing facility.

Due to the difference in the operation of the devices, each type is installed in a location that best suits its capabilities in order to collect information in accordance with the *Surveillance Devices Privacy Policy*.

Surveillance Devices Act (NT)

For the purposes of the *Surveillance Devices Act (NT)* a 'private activity' is defined as:

“an activity carried out in circumstances that may reasonably be taken to indicate the parties to the activity desire it to be observed only by themselves, but does not include an activity carried out in circumstances in which the parties to the activity ought reasonably to expect the activity may be observed by someone else.”

It is an offence under Section 12(1) of the *Surveillance Devices Act (NT)* for a person to:

- (a) Install, use or maintain an optical surveillance device to monitor, record visually or observe a private activity to which the person is not a party; and
- (b) Know a device is installed, used or maintained without the express or implied consent of each party to the activity.

In accordance with the *DTC Track Regulations*, the *DTC Stable Agreement* and the *Surveillance Devices Privacy Policy*, it is the intention of the Darwin Turf Club and TRNT to ensure that all persons who are authorised to enter the stables area, either as a trainer, employee, Darwin racing stakeholder or an invitee are aware of the use and operation of optical surveillance devices in the area.

It is an express consideration of this policy that all persons who enter the Premises acknowledge and are aware of the use of optical surveillance devices in accordance with the terms of this policy and the *Surveillance Devices Privacy Policy*.

Collection and Storage of Information

The devices have been installed by licensed professionals who are also engaged as service providers to maintain the equipment and ensure the security of the collected information.

Only certain authorised staff (the Stewards) can access your personal information and these staff members are required to maintain the confidentiality of your personal information at all times. Direct access to our database or server is restricted to ensure your data remains secured and protected and we use all reasonable means to protect your personal information securely against unauthorised access and disclosure.

The surveillance devices will be linked to an internal server, situated in the communications room of the Darwin Turf Club. The server and the back-up UPS will be locked in a secure rack. Only those with relevant authorisation from the Stewards will be able to physically access the server that holds the data collected from the surveillance devices.

All data collected from the surveillance devices will be stored on the server for a minimum period of 30 to a maximum period of 60 days. At the conclusion of this period; the stored

footage will be overwritten on a continuous process as the devices continue to operate. In order to access the stored data, an authorised person will have to use the computer system located downstairs in the Stewards Office.

In the Stewards Office there will be three monitors connected to the upstairs server for reviewing footage recorded by the devices. The system will not be monitored by the Stewards at all times, but will be able to be accessed by an authorised person at any time. These monitors will not be in direct sight from the entrance to the Stewards Office and will not be accessible by the general public. Use of the computer system to review footage or observe the operation of the surveillance devices will require input of a secure login by an authorised person. Any period of inactivity on the computer system will result in the user being logged out and the secure login will have to be entered again.

In the course of an investigation by the Stewards relevant footage will be exported from the 30-60 day storage on the servers to the computer system for review by the Stewards. Neither the Stewards nor the Service Providers will be able to access footage recorded beyond that 30-60 day period. All exported footage not relevant or utilised in the course of an investigation will be destroyed from all devices.

Security of Personal Information

We take steps to protect the security of the personal information we hold from both internal and external threats by:

- Regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information;
- Taking measures to address those risks, for example, we keep a record (audit trail) of when someone has accessed, added, changed or deleted personal information held in our electronic databases and regularly check that staff only access those records when they need to;
- Ensure that only authorised persons are able to access the server and separate computer system at all times; and
- Conducting regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

For further information on the way we manage security risks in relation to personal information we hold please contact the TRNT below.

How to make a Complaint

If you wish you have a right to complain or express your concerns to us about the information collected by the surveillance devices.

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior officer than the officer whose actions you are complaining about.

You will receive confirmation of our receipt of your complaint and we will respond to it with a decision within 30 days.

How to Contact us

You can contact us by:

Attention: Andrew O'Toole, CEO Thoroughbred Racing Northern Territory

Email: trnt@trnt.org.au

Telephone: 08 8923 4222

Post: GPO Box 589 Darwin NT 0801

Fax: 08 8923 4233