

PRIVACY STATEMENT – Clinical Recording and Observation System

The University of Sydney is committed to protecting your privacy and processing your personal information fairly and lawfully, in compliance with the NSW Privacy and Personal Information Protection Act 1998 and the NSW Health Records and Information Privacy Act 2005.

The University is using video and audio recording and observation technology to support student learning.

The University is using video and audio recording and observation technology in many parts of the Susan Wakil Health Building to support student learning. This video and audio recording and observation technology is designed to:

- help students improve their clinical skills
- enable academic staff to conduct clinical and practice based assessments
- allow student clinical skills to be monitored in real time for peer review and facilitator feedback
- allow students to review and reflect on their clinical practice to and improve performance.

The University has installed cameras, microphones and a management system provided by Intelligent Video Solutions in numerous rooms throughout the Susan Wakil Health Building so that staff and students working in in many areas of Nursing and Health Sciences can use video and audio records and clinical observation to improve their teaching and clinical practice and reflective skills. The full system is called the Clinical Recording and Observation System (CROS).

Many staff and students undertaking Nursing and Health Sciences subjects will be required to use the video and audio recording and observation technology. This is because of the value this technology brings to teaching, learning and improving student clinical skills.

The video and audio recording and observation technology is not intended to record footage of temporary visitors to the Susan Wakil Health Building. Wherever possible, camera placement has been designed to capture footage in learning spaces only.

Some CROS data may be used for research purposes. Any use of CROS technology and data for research purposes is subject to Ethics approval and must go through comply with NHMRC National Statement on Human Research Ethics, be consistent with University research data management plan requirements and any additional requirements outlined by the Ethics Committee. These arrangements will also govern data access, retention and destruction, as well as consent arrangements for research participants.

Recorded and observation information will be used to aid teaching and support learning.

Personal information is any information about an individual whose identity is apparent or can be ascertained. The types of personal information that CROS will hold are:

- video and audio footage of staff and students in teaching and training environments
- staff and student names and associated units of study
- marking and assessment templates and associated comments.

The video and audio observation and recording will only occur in signposted clinical practice rooms. Recording will only be undertaken for specific teaching and assessment purposes. Real time observation capability will run continuously in signposted areas, but will only be observable by authorised staff and students in observational settings.

Recording will only be intermittent. Recording will be activated or programmed by teaching staff or students for specific activities and will not be ongoing. When recording is activated, both sound and vision in the clinical practice rooms will be recorded. Staff and student names, SID and subject allocations will also be

documented in the CROS system as part of allocating system authorisations and permissions. Authorised University staff will have the ability to record, edit and tag recordings. For practical assessments, staff will observe and grade assessments in CROS.

Guest lecturers, clinical patients and invited users of clinical spaces, in consultation with Faculty staff, will be able to opt-out of video and audio recordings during their temporary use of clinical spaces.

Recorded information and observation technology will be securely managed.

All footage held in CROS is securely managed and will only be accessible to small numbers of staff and students within subject disciplines, with a specific teaching or learning need to access the footage.

Access to footage will generally be enabled by Faculty Administrators and staff who will enable access where appropriate to specific students. All Faculty Administrators and teaching staff with CROS access have been advised of their responsibilities to protect the personal information contained in CROS recordings and to ensure this information is only used for authorised purposes to support teaching and learning. Technical support staff can only access recordings when enabled by Faculty Administrators, for the purpose of providing technical support. CROS does not enable students to share recordings they have access to with others.

For student initiated recordings in Room 131 and in Speech Pathology streams, students must ensure that access to recordings and observations is only granted to relevant teaching staff and to students who appear in the footage. Access to these staff and students must only be enabled for the purpose of supporting specific teaching and learning activities. Footage must only be shared for class feedback and debriefing purposes. CROS recordings must only be used to support teaching and learning. Where access to recordings is requested for purposes other than those directly related to supporting student learning or to specific subject assessment, authorisation for this use must follow the strict authorisation requirements of the University's [CCTV Procedures](#). Alternatively, requests for access must be made through the University's official Government Information (Public Access) Act [processes](#).

All actions in CROS, including the viewing of real time observations, are logged for security and investigation purposes as required.

All recordings are stored in the University's secure cloud servers, located in Sydney.

Reporting and analytics will be generated by CROS, to provide insights into system use for Faculty staff. This reporting will not contain any personally identifying information.

Where recordings are made of clinical patients, it is important to be aware that these recordings contain personal health information. Health information has the highest security classification in the University's Data Classification Standard, Highly Protected. These recordings are very securely managed, only shared and used with consent and will never be used for any other purpose that does not align with the patient's consent.

Staff and students are reminded that under the University's [Privacy Policy 2017](#), [Student Charter 2020](#), [Code of Conduct Staff and Affiliates](#), [Acceptable Use of ICT Resources Policy 2019](#) as well as other obligations, they are required to protect the personal and health information that is held by the University. Misuse of personal information in CROS recordings will result in privacy breach management processes and/or disciplinary or misconduct processes.

Recorded information will only be kept for limited periods of time, to meet educational needs.

The University retains all its information in accordance with the State Records Act 1998 (NSW). The information in CROS is only kept for short periods of time before being permanently deleted. The majority of recordings will be kept for a semester, to enable staff and students to review progress and to complete units of study successfully. Recordings that are used as part of assessments will be kept for the length of any appeals period applying to the assessment.

Where Faculty staff may wish to keep small numbers of recordings as exemplars of best practice to aid future students, the specific students and/or patients involved must actively consent to this ongoing data retention and use.

If, to maintain compliance with NSW privacy legislation, there is a need for a recording to be deleted immediately and not shared, authorised Faculty CROS administrators have the ability to do this where necessary.

You have the right to access and correct this personal information.

You have the right to access and correct your personal information held by the University. Should you wish to access or amend your information in CROS please contact the CROS Business Owner at fmh.sydneyprecinct@sydney.edu.au

This privacy statement must be read in conjunction with the Privacy Policy and the University's [Student Personal Information Collection Statement](#) which describes how the University handles personal information. Privacy enquiries or complaints about CROS recordings can be addressed to privacy.enquiries@sydney.edu.au