



## Board Policy Security Video Surveillance

### Security Video Surveillance

The purpose of this policy is to provide guidance to staff and members of the public to ensure that Vancouver Island Regional Library's use of surveillance achieves an appropriate balance between an individual's right to privacy and the need to ensure the safety and security of Library employees, customers, visitors and property. The appropriate use of video surveillance, where deemed necessary and permissible under applicable privacy laws, is intended to keep library facilities and properties operating in a safe and secure manner.

### The Right to Privacy

In accordance with the *Freedom of Information and Protection of Privacy Act* ("FOIPPA" or the "Act"), Vancouver Island Regional Library (VIRL) is committed to protecting the privacy of staff and customers. VIRL also has obligations to ensure the safety of its premises and the security of property, and therefore authorizes the use of video surveillance for these purposes. VIRL supports the use of surveillance in a manner that minimizes encroachments upon the privacy of staff, volunteers and customers, and in compliance with FOIPPA.

### Notice of Use of Video Systems

- a) VIRL shall provide notice of the use of video surveillance by posting signs, visible to members of the public, at all entrances and/or prominently displayed on the perimeter of the grounds under video surveillance;
- b) All signage shall include:
  - i) The legal authority for the collection of personal information;
  - ii) The principle purpose(s) for which the personal information collected through surveillance is intended to be used; and
  - iii) The title, business address, and telephone number of someone who can answer questions about the collection.

### Personnel Authorized to Operate Video Equipment

Only Authorized Personnel shall be permitted to operate video surveillance systems or access surveillance recordings ("Authorized Personnel").

Authorized Personnel includes all Library branch managers and other persons designated by the Executive Director.

### Video Equipment/Records

#### Retention period

Surveillance Equipment ("Equipment") will be configured to retain surveillance recordings on a temporary basis (approximately 30 – 60 days), depending on the capabilities of the recording device and technology.

Surveillance footage (“Recordings”) used to make a decision affecting any individual will be retained for one year, or such longer period as may be required under the Act or other applicable laws.

### **Monitoring and Use**

Recordings will not be monitored continuously, but may be accessed, reviewed, and used as necessary and appropriate to investigate specific incidents, to address safety or security concerns, and for other purposes permitted under FOIPPA.

VIRL surveillance systems are not intended or designed for monitoring staff performance, but may on occasion inadvertently record information relevant to employment investigations or misconduct. Any information that is recorded by these systems relating to such issues will only be used by VIRL to the extent that such use is permissible under the *Freedom of Information and Protection of Privacy Act*.

### **Record Identification**

All Recordings, including footage and surveillance records (and any media on which such recordings are stored), shall be clearly identified as to the date and location of origin. An inventory will be maintained of all Recordings and Equipment.

### **Logbook**

Each access to the Recordings or the Equipment will be recorded in a logbook. Logged activities will include all access, use, maintenance, and storage of records, and all instances of access to, and use of, recorded material, including the name of the person accessing the system. All logbook entries will detail staff name, date, and activity. This logbook is to be stored in a safe and secure location.

### **Access to Video Records**

#### **Access**

Access to the video surveillance records, e.g. Recordings, logbook entries, video feed, etc. shall be restricted to Authorized Personnel, and only in order to comply with their roles and responsibilities as outlined in this Security Video Surveillance Policy.

#### **Storage**

All Recordings and Equipment must be stored securely in a locked receptacle located in an access-controlled area.

### **Formal Access Requests Process**

With the exception of requests by law enforcement agencies, all formal requests for video records should be directed to VIRL’s Privacy Officer (privacy@virl.bc.ca). Requests are subject to the requirements of VIRL’s Privacy Policy.

Requests for access to recordings made by law enforcement officials may be directed to any Authorized Personnel who is a Manager or Manager designate (“Designate”). Investigating officers will be asked to complete a Request for Personal Information Form and forward it to an Authorized Manager or Designate.

The Manager or Designate will, in the ordinary course, request approval by the Privacy Officer, and upon receipt of that approval, may provide access to or copies of the Recording for the specified date and time of the incident requested by the law enforcement officer. In emergency circumstances giving rise to an immediate risk to any person, the Manager or Designate may exercise a discretion to provide access without seeking approval of the Privacy Officer; all such access will be appropriately documented. Access to, and the release of, Recordings will be in accordance with FOIPPA. VIRL reserves the right to refuse requests for access to Recordings in appropriate circumstances.

### **Viewing Images**

When Recordings are accessed and viewed the access will be undertaken by Authorized Personnel in a private, controlled area that is not accessible to other staff and/or visitors.

### **Custody, Control, Retention and Disposal of Video Records/Recordings**

VIRL is responsible for the security of all Recordings and Equipment within its custody or control. Personnel may not access, use, or disclose Recordings, or provide access to Equipment except in compliance with this Policy and FOIPPA.

VIRL makes all reasonable efforts to ensure the security of Recordings and Equipment in its control/custody, and makes all reasonable efforts to ensure their safe and secure disposal. Old Recordings and Equipment must be disposed of in accordance with an applicable technology asset disposal process, ensuring personal information is erased prior to disposal, and cannot be retrieved or reconstructed.

### **Unauthorized Access and/or Disclosure (Privacy Breach)**

Any VIRL employee who becomes aware of any unauthorized disclosure of a Recording or unauthorized access to Equipment, in contravention of this Policy or FOIPPA, has a responsibility to ensure that the Executive Director or Privacy Officer are immediately informed of the breach.

A breach of this Policy may result in disciplinary action up to and including dismissal. A breach of this Policy by service providers (contractors) to VIRL may result in termination of their contract.

### **Inquiries from the Public Related to the Video Surveillance Policy**

A staff member receiving an inquiry from the public regarding the Video Surveillance Policy shall direct the inquiry to VIRL's Privacy Officer ([privacy@virl.bc.ca](mailto:privacy@virl.bc.ca)).

### **Approval History**

<b>APPROVED BY:</b>	<b>DATE:</b>
VIRL Board of Trustees	June 2010
VIRL Board of Trustees	March 17, 2018
<b>DATE OF NEXT REVIEW: March 2023</b>	<b>REVIEW CYCLE: 5 years</b>