



**PURPOSE:**

To enhance protection for employees and visitors, strengthen security of infrastructure/town facilities and assist law enforcement agencies with investigations.

**AUTHORITY:**

- OIPC Guidelines for Video Surveillance by Public Bodies in Newfoundland and Labrador, June 2015
- ATIPPA, 2015
- Criminal Code of Canada

**OPERATIONS RELATED TO CCTV SYSTEM**

CCTV is used for security for two specific and interrelated purposes:

1. To provide protection for employees, visitors, and infrastructure/facilities by enabling the surveillance of large areas for suspicious activity or possible threats; and
2. To assist when necessary with the investigation of specific incidents or investigations by a Law Enforcement Agency such as the Royal Canadian Mounted Police (RCMP) or the Royal Newfoundland Constabulary (RNC).

The primary uses of the CCTV System include but are not limited to:

1. Investigating Suspicious Activity
  - a. During specific incidents, i.e. suspicious packages or bomb threats, or suspicious activity where further investigation of the incident would place the safety of personnel at risk;
  - b. During the deployment of resources, to increase the effectiveness of monitoring areas that are dangerous or hazardous to observe physically, i.e. suspicious packages or during bomb threats.
    - i. Use of CCTV system to provide for the safety of people attending demonstrations as a counter to civil disorder and to provide for the safety of the individuals working in town buildings.
    - ii. CCTV Systems are to be used at the Emergency Operations Centre to monitor resources or changes in the location before First Responders (Enforcement, Fire Services or Police) arrive.



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- c. Provide situational awareness by checking for suspicious activity or evaluating areas for potential threats.
  - d. Monitor criminal activity and alert the appropriate resources and to assist police authorities with their investigation.
2. Observing Areas with Restricted or Limited Access
- a. Provide ongoing monitoring of areas that have restricted or limited access to only certain individuals and to monitor for breaches or investigation of incidents in these locations, such as the Stoney Hill Compound or the Emergency Operations Centre at Fire Station One.
3. Providing Enhanced Security During Building Lockdown Situations.
- a. During periods of heightened security alerts, the CCTV System allows for the monitoring of public spaces around infrastructure and facilities that may be at increased risk of criminal activity or that may be at risk due to terrorist or other potential threats.

## **RESTRICTIONS ON CCTV OPERATIONS**

The following restrictions have been placed on the use of CCTV Cameras by “OIPC Guidelines for Video Surveillance by Public Bodies in Newfoundland and Labrador” (henceforth, “Guidelines for Video Surveillance”) to ensure adherence to ATIPPA, 2015.

1. The CCTV System is not to be used for monitoring staff performance.
2. Video monitoring of public areas is limited to uses that do not violate the reasonable expectation of privacy as defined by law and legislation.
3. Guidelines for Video Surveillance does not apply to covert surveillance or surveillance when used as a case-specific investigation tool; and temporary or covert cameras must be removed once investigations are concluded.
4. The policy does not imply or guarantee that cameras will be constantly monitored in real time.
5. This policy does not apply to video conferencing or related methods of communication.



## **ACCESS TO CCTV EQUIPMENT**

The CCTV System and monitoring equipment shall only be used by authorized persons as listed below:

1. Authorized individuals include the following individuals.
  - a. Chief Administrative Officer,
  - b. Town Clerk,
  - c. Senior Management of the Town, (as required),
  - d. Enforcement Manager,
  - e. IT Managers,
  - f. ATTIP Coordinator,
  - g. Facilities Managers (as required), and
  - h. Members of a Police Department conducting an investigation with the assistance of the Enforcement Manager.
2. The access and disclosure of recorded images will be conducted in accordance with ATTIPA 2015 in compliance with the needs for security of facilities and personnel safety; or in cooperation with a peace officer such as the RCMP or RNC in connection with their law enforcement functions in accordance with the Criminal Code of Canada; or
  - a. if necessary for the purposes of legal proceedings; or
  - b. other lawful requirement.
3. In accordance with ATIPPA, 2015 and OPIC regulations, personnel not on the authorization list as above, shall not be permitted to view live or recorded CCTV images, unless following established guidelines.

The CCTV recording systems will be contained in the IT server rooms which will be secured at all times when not in use by authorized personnel.



1. Review of Recorded Images

- a. A log will be maintained by the Enforcement Manager documenting who has accessed and used the recordings, the purpose for viewing the recordings and any action taken as a result of the recording.

2. Access to Recorded Images

- a. In addition to being stored in secure locations, passwords will be configured to control access to recorded images for authorized individuals.
- b. Information obtained through video monitoring will only be released when authorized in accordance with the Criminal code of Canada or ATTIPA 2015.

**PUBLIC NOTIFICATION**

The public must be informed that CCTV systems are in place and that images are being recorded. Signage will be displayed in all applicable locations.

1. Signage will be used to identify the location of CCTV to inform the public that personal information is being collected through video surveillance.
2. Signage will indicate the perimeter of surveillance areas and indicate who is responsible for the surveillance, including who is responsible for compliance with privacy laws, and who can be contacted to answer questions or provide information about the system.

**INSTALLATION OF CCTV SYSTEMS**

Installation of CCTV components must follow legislation as outlined by the Office of the Privacy Commissioner in accordance with ATIPPA, 2015 and include the following as outlined in the general "Guidelines for Video Surveillance for Public Bodies":

1. Privacy-specific criteria that must be met before CCTV surveillance is undertaken including a description of alternative measures undertaken and their result;
2. A Privacy Impact Assessment of the proposed CCTV system should be conducted to determine the actual or potential type and degree of interference with privacy that will result from the implementation of CCTV and the ways in which such risks will be mitigated.



## **RETENTION**

Retention of recorded images, timelines for retention and destruction of images will be conducted as follows:

1. Recorded images will be stored for a period of not less than 30 (thirty) days, unless otherwise limited by the recording system.
2. Recorded images/video will be stored in a secure location with access by authorized personnel only.
3. All archived images/information will be maintained in a secure location and when necessary disposed of in an appropriate manner following established regulation as required by ATIPP for secure document disposal.
4. The CCTV Recording System is configured in such a manner that after 30 (thirty) days, (in conjunction with system parameters) all images will be overwritten and automatically destroyed.

## **ATIPP**

Individuals Access to Recorded Images:

1. All individuals requesting Access to Recorded Information will be directed to contact the ATIPP Coordinator in accordance with the procedures as outlined in the ATIPPA 2015.

The following individual access procedures relate to accessing recorded Images:

1. Access to and use of recorded material will be facilitated by the Enforcement Manager in conjunction with the ATIPP Coordinator.
2. Where recorded video is to be displayed, the recognizable characteristics of other people in the footage will be obscured.
3. Security systems images from recorded material will not, under any circumstances, be used to publicize the existence or success of the CCTV operations.



**PRIVACY BREACH**

Measures have been identified in this policy to prevent a policy breach or release of personal information. In the event of a breach of policy or release of information contrary to this policy the following actions will be implemented:

1. Immediately upon discovery of a breach of this CCTV policy the Enforcement Manager will notify the Chief Administrative Officer or designate and the ATIPP Coordinator.
  - a. The ATIPP Coordinator will conduct a review of the incident, and will recommend if further actions are required.
2. Breaches of any sections of this policy will be subject to an internal review by the Town Clerk who will make any required recommendations to the Chief Administrative Officer for disciplinary action or administrative sanctions when necessary.
3. In the case of privacy breaches, the ATIPP Coordinator will conduct a review and notify the OIPC accordingly. In cases of willful privacy breaches, the ATIPP Coordinator will coordinate an investigation in cooperation with the OIPC, the ATIPP Office and Senior Management.
4. Authorized personnel who operate CCTV System or components must adhere to both the Access to Information and Protection of Privacy Act, 2015 and OIPC’s “OIPC Guidelines for Video Surveillance by Public Bodies in Newfoundland and Labrador, 2015.

**REVISION HISTORY:**

Revision:	Author:	Change Made:	Date: