

PURPOSE

These guidelines have been developed to ensure that Britannia Community Services Centre identifies appropriate uses for video security camera technology, that appropriate authorization is obtained to implement such a system and to manage records that may be created using this technology in a manner that complies with provincial legislation, and complies with good records- management requirements.

SCOPE

This policy applies to any video security camera technology operated by or for Britannia Community Services Centre that collects personal information in any form.

These guidelines are subject to the City's video monitoring policy and procedures.

DEFINITIONS

“Act” means the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996 Ch. 165, as amended from time to time.

“Personal information” means recorded information about an identifiable individual.

“Record” means any recorded information, however recorded, whether in printed form, on film, by electronic means or otherwise, and includes: a photograph, a film, a microfilm, a videotape, a machine-readable record, and any record that is capable of being produced from a machine-readable record.

“Security camera technology” means a mechanical, electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals, assets and/or property

GUIDELINES

1. General

- 1.1. Britannia Community Services Centre uses security camera technology to ensure the security of individuals, assets and property.
- 1.2. The implementation of security camera technology must be in accordance with these guidelines.
- 1.3. Britannia Board of Management (Board) approval is required for any security camera technology. Requests to implement or expand security camera technology at Britannia must be submitted to the Board for approval.
- 1.4. Prior to introducing or expanding security camera technology, the rationale for this system change must be clearly articulated in writing to the Executive Director before proceeding in writing to the Britannia Board of Management. Such rationale must include the following information:
 - 1.4.1. the problem the system is expected to address

- 1.4.2. the existing security camera inventory
- 1.4.3. how the system will address this problem
- 1.4.4. why less intrusive security measures will not be effective
- 1.4.5. how the benefits are expected to outweigh any privacy invasion resulting from the use of the system
- 1.4.6. the associated cost related to installation, maintenance and operation of the system
- 1.4.7. the terms of use of the system, including:
 - 1.4.7.1. location of cameras
 - 1.4.7.2. areas monitored by cameras
 - 1.4.7.3. monitoring location
 - 1.4.7.4. restrictions on camera position or field of view, if any
 - 1.4.7.5. restrictions on recording of information, if any
 - 1.4.7.6. hours of operation
 - 1.4.7.7. proposed installation date
 - 1.4.7.8. which personnel are authorized to operate the system

- 1.5. Security camera technology will be considered only after other, less intrusive, security methods have been considered and have been found to be unworkable.

2. Privacy Considerations:

Security camera technology that records images of individuals must be protected in accordance with the Act.

Britannia Community Services Centre will exercise a high degree of care when using security camera technology in order to protect the privacy of individuals who visit or work at monitored places. Although security camera technology may be required for legitimate operational purposes, it must be used in accordance with the provisions of the Act.

As a general rule, the Act requires that Britannia Community Services Centre will notify individuals that it is collecting their personal information. Security camera technology must be clearly visible and marked by prominent signage.

3. Records Management Considerations:

Records created by security camera technology are subject to records management and retention periods as specified by the City of Vancouver Records Classification and Retention Schedule, which prescribes retention periods for these records as follows:

- 3.1. All storage devices that are not in use must be labeled, dated, and stored in the safe located in the Information Centre.
- 3.2. Records should be destroyed after 30 days unless the records reveal that an incident has occurred and that the recorded information contains personal information about an individual, and the information is used to make a decision that directly affects the individual, the recorded information will be retained for one year.
- 3.3. Access to and viewing of the stored records should only be by the Executive Director or designate.
- 3.4. A log will be kept of all instances of access to, and use of the recorded information.

- 3.5. Use of the recorded information should be viewed only in the event that an incident is reported or suspected to have occurred.
- 3.6. Storage devices and records required for evidentiary purposes will be retained until law enforcement authorities require them. A storage device release form will be completed before any storage device is disclosed to a law enforcement agency.
- 3.7. Recorded information will not be released to any person or agency for any purpose except to a law enforcement agency where required under the law, or to an individual who is the subject of surveillance unless access is denied on the grounds set out in Division 2 Part 2 – Exceptions of the Act (instances where disclosure could be harmful).

4. Records Access Process

- 4.1 To obtain access to a record, the applicant must make a written request that:
 - 4.1.1 provides sufficient detail to enable an experienced employee of Britannia, with a reasonable effort, to identify the records sought,
 - 4.1.2 provides written proof of the authority of the applicant to make the request, if the applicant is acting on behalf of another person in accordance with the regulations, and
 - 4.1.3 The applicant may ask for a copy of the record or ask to examine the record.
- 4.2 Law enforcement agencies must complete the attached Law Enforcement Disclosure form in addition to any other written requests that may be required to obtain private information.

5 Roles & Responsibilities

- 5.1 **Executive Director:** The Executive Director is responsible for overseeing these guidelines. The Executive Director will appoint the Manager of Administrative Services as the Designate responsible for the day-to-day administration and stewardship of the guidelines
- 5.2 **Britannia Board:** The Board is responsible for approval of these guidelines.

Agreed by the Executive Board Feb. 24, 2010 that these guidelines are to be adjusted as needed.
