

TOWN OF TWO HILLS



Policy Number: 2016-01
Date of Issue: March 22, 2016
Policy Subject: Video Surveillance Policy

Policy Statement:

To ensure that, in adopting the use of security video surveillance cameras, the Town of Two Hills balances the security benefits derived from the use of video surveillance with the privacy rights of individuals.

The Town of Two Hills recognizes the need to balance an individual's right to privacy and the need to ensure safety and security of Town employees, customers, visitors and property. Proper video surveillance, where deemed necessary, is an effective means of helping keep the Town facilities and properties operating in a safe and secure manner. While video surveillance cameras are installed for safety and security reasons, the Town's video surveillance systems must be designated and maintained to minimize privacy intrusion.

Definitions

In this Policy:

"Authorized Personnel" means the C.A.O. or individuals authorized by the C.A.O. for the review of recorded videos at each individual site.

"CAO" means the Chief Administrative Officer of the Town of Two Hills.

"FOIP" means Freedom of Information and Privacy Protection Act.

"Law Enforcement Agency" means an organization granted the authority by Federal, Provincial, or Municipal Governments to enforce the laws. These organizations include, but are not limited to, the Canadian Security Intelligence Service, the RCMP and local Peace Officers.

"Municipal Property and Facilities" means any land and structures owned in whole by the Town of Two Hills.

"Town" means the Municipality of the Town of Two Hills, in Alberta.

Executive Limitations

1. Factors to Consider Prior to Using Video Surveillance

Before deciding to install video surveillance, the following factors must be considered:

- a) A video surveillance system shall only be used as a measure of deterrence or detection;
- b) The proposed design and operation of the video surveillance systems shall minimize privacy intrusion.

2. Designing and Installing Video Surveillance Equipment

When designing a video surveillance system and installing equipment, the following shall be considered:

- a) Given the open and public nature of the Town's facilities and the need to provide for the safety and security of employees and customers who may be present at all hours of the day, the Town's video surveillance system may operate at any time in a 24 hour period;
- b) The video equipment shall be installed to monitor only those spaces that have been identified as requiring video surveillance;
- c) The ability of authorized personnel to adjust cameras shall be restricted so that authorized personnel cannot adjust or manipulate cameras to overlook spaces that are not intended to be covered by the video surveillance program;
- d) Equipment shall never monitor the inside areas where the public and employees have a higher expectation of privacy (e.g. change rooms and washrooms);
- e) Reception/recording equipment shall be located in a strictly controlled access area. Only authorized personnel shall have access to the controlled access area and the reception/recording equipment; and
- f) Every reasonable attempt shall be made by authorized personnel to ensure video monitors are not in a position that enables the public and/or unauthorized staff to view the monitors.

3. Notice of Used of Video Systems

- a) The Town shall post signs, visible to members of the public, at all entrances and/or be prominently displayed on the perimeter of the grounds under the video surveillance.

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- b) Unless the public has otherwise been made aware of surveillance cameras at a surveillance area, the main entrance of the area will display the following notice:

Surveillance cameras may be operating in <location of camera> to deter and/or detect criminal activity and for public security. The collection of recorded camera images is authorized under section 33© of the Freedom of Information and Protection of Privacy Act (FOIP). If you have any questions about this surveillance, contact <name of position> at <phone number>.

- c) In addition, the following sign will be displayed at the surveillance location:

Surveillance camera may be operating in this area to detect and/or deter unlawful activity (vandalism/theft) and for public security. For more information, contact <name of position> at <phone number>.

4. Personnel Authorized to Operate Video Surveillance Systems

- a) Images shall be recorded in a protected digital location. Only authorized personnel shall be permitted to operate video surveillance systems.
- b) Town employees responsible for the use of the video surveillance equipment shall ensure adherence to FOIP Legislation and this Policy.
- c) When recorded images from the cameras are viewed for law enforcement or investigative reasons, this shall only be undertaken by an authorized personnel in a private, controlled area that is not accessible to other staff, customers or the public.

5. Limiting Use, Disclosure and Retention of Personal Information

- a) Recordings should only be kept as long as necessary to fulfil the purpose of the video surveillance. Recordings no longer required should be destroyed or overwritten.
- b) As the surveillance system has been installed for public safety or deterrence purposes but detects possible criminal activity or non-compliance with or breach of a statute or bylaw that could lead to a penalty or sanction, the Storage Devices required for evidentiary purposes should be retained and stored.
- c) If a Storage Device is released for law enforcement purposes, a written release should be obtained stating the purpose and requesting official.
- d) An individual who is the subject of the information had a right to access to his or her recorded information. Access may be granted in full or in part depending upon whether any of the expectations in FOIP apply and whether the expected information can reasonably be severed from the record.

6. Authority/Responsibility to Implement

The C.A.O. is authorized to establish procedures for the implementation of this policy.

Effective Date

This Policy becomes effective upon approval by Town Council.

TOWN OF TWO HILLS

SONNY RAJOO, DEPUTY MAYOR

ELSIE HOWANYK, C.A.O.