



LONDON PUBLIC LIBRARY POLICY

Title of Policy: Video Surveillance Camera Policy
Policy Type: Means
Policy No.: C-C-06

Effective Date: June 23, 2015

Review: June 2017

PURPOSE:

The purpose of this policy is to ensure that, in adopting the use of video surveillance cameras, London Public Library (LPL) recognizes and balances the security benefits with an individual's right to privacy. It is also to ensure that the use is in accordance with privacy legislation and LPL's Access to Information and Protection of Privacy Policy.

SCOPE:

This policy applies to all LPL-owned video surveillance camera installations in all locations of the London Public Library. This policy is not intended to cover video surveillance cameras owned and installed by community partners in shared spaces. It does not cover cameras owned and installed in common-area spaces in buildings where LPL leases space. This policy does not apply to personal cameras, cellphone cameras, or other image-recording devices used by patrons as covered by the Library's Photography/Videography/Filming Policy.

DEFINITIONS:

Employee means a person who is employed by the Library and includes all Employees, including Page and Casual staff.

Video Surveillance Camera means a stationary or rotating camera attached to a recording device that records digital images which provide a visual record.

MFIPPA means Municipal Freedom of Information and Protection of Privacy Act.

Incident Report means a report prepared by staff or security personnel that details an incident involving the public on Library property.

Security means the service provider that is contracted to provide security services to LPL.

Volunteer means a person who voluntarily extends his or her services to actively support the Library, and who does so without remuneration.

POLICY STATEMENT:

London Public Library endeavours to provide a welcoming and safe environment for the enjoyment of the public, employees and volunteers so that all persons may enjoy the benefits of the Library. Individuals using Library services and resources are expected to act with respect and consideration for others and Library property. London Public Library recognizes the need to balance an individual's right to privacy and the need to ensure the safety and security of Library employees, volunteers, users, and property. Given the challenges of a public environment open to all and the ineffectiveness of conventional methods to help safeguard Library facilities and properties in a safe and secure manner, video surveillance, where deemed necessary following assessment, is used as an effective mechanism to achieve this goal. Video surveillance cameras will also increase the effectiveness of investigation and aid law enforcement through the use of recorded images when requested. Video surveillance cameras and the digital recordings generated by this equipment are the property of London Public Library and the Library retains custody and control of both.

LPL video surveillance cameras will only be used for security and safety purposes. They will not be used to monitor Employee or Volunteer performance unless the information recorded is identified as being related to a potential security, insurance, or liability risk, potential breach of a municipal bylaw and/or potential commission of a provincial or criminal offence.

1. Installation

a. Factors for Consideration Pre-Installation

- i. The use of video surveillance cameras shall be justified on the basis of verifiable, specific reports of incidents of crime or significant safety concerns;
- ii. A video surveillance system shall only be considered after other measures of deterrence or detection have been considered;
- iii. An assessment of privacy implications on the effects of a proposed video surveillance system shall be conducted and the ways in which any adverse effects can be mitigated by examining the collection, use disclosure and retention of personal information; and

- iv. The proposed design and operation should minimize privacy intrusion to the extent practicable.

b. Design and Installation Parameters

- i. Video surveillance cameras may operate at any time in a 24-hour period, either continuously or with motion sensor activation, given the open and public nature of the Library's facilities;
- ii. Video surveillance cameras shall be installed to monitor those spaces that have been identified as requiring video surveillance;
- iii. Only authorized personnel may operate video surveillance systems or adjust video surveillance camera positioning;
- iv. Video surveillance cameras shall not monitor the inside of areas where the public and employees have a higher expectation of privacy, i.e. washrooms, change rooms, employee break rooms;
- v. Video surveillance equipment shall be located in a controlled access area to which only authorized personnel have access. Access to recorded content is security controlled using computer security measures; and
- vi. Every reasonable attempt will 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.

c. Notice of Video Surveillance Camera Use

- i. The public shall be notified through signage, visible to members of the public, that surveillance is or may be in operation before entering surveillance area; and
- ii. Notification on signage shall identify the Library contact person who can answer questions about the video surveillance system and method of contact.

2. Video Surveillance Camera Records

- a. The Library's use, retention, and disclosure of video surveillance digital camera records shall comply with MFIPPA and all other relevant federal and provincial legislation related to personal privacy.
- b. Digital records are retained for seven (7) days. Archiving of records, either in digital or print format, beyond seven (7) days, where there are reasonable grounds that the data will be required for a specific

investigation and/or follow-up to corroborate an Incident Report must be approved by the CEO & Chief Librarian (CEO) or designate. When recorded information has been viewed for law enforcement or public safety purposes, the recorded information will be retained for **two (2) years**. The Library will take all reasonable efforts to ensure the safe and secure disposal of digital records not required beyond seven (7) days.

- c. All tapes or other storage devices shall be clearly identified (labelled) with date, time, location of origin and stored securely in a locked receptacle located in an access controlled area.
- d. A log shall be maintained by Library Administration to log and record activities relating to video surveillance. Activities include all information regarding the access, use, and storage of records. This log will remain in a safe and secure location in the Administration Offices. Security personnel will also maintain a log to record viewing by law enforcement personnel. The Supervisor, Security Services will maintain a separate log to record burning of DVDs when requested by law enforcement personnel. Both Security logs will be provided to Administration on a monthly basis and maintained in the Library Administration log. Only authorized personnel may access logs.

3. Access/Review /Disclosure of Digital Records

- a. Any review of video surveillance camera digital records shall be undertaken for Library-authorized purposes and not on behalf of an inquiring member of the public or employee.
- b. Access to video surveillance camera digital records is limited to authorized employees and security personnel, who shall only access such records during the course of their regular duties. Authorized employees include:
 - i. Designated members of Library Administration;
 - ii. Security Personnel at the Central Library;
 - iii. Staff Member(s) in Charge; and
 - iv. Employees or Volunteers who may be requested to view records for identification purposes.
 - v. Information Technology Services (ITS) employees. The ITS department is responsible for the maintenance of the video surveillance camera system, ensuring that the system functions as designed, and / or troubleshooting any issues that arise. ITS employees will generally not review the content of any video

recording other than in an ancillary manner which is unavoidable in the course of maintenance and troubleshooting. In the absence of the Supervisor, Security Services, ITS personnel will create a digital copy for law enforcement personnel when directed by Library Administration.

- c. Access to video surveillance camera digital records by a member of the public must be requested in accordance with the requirements of MFIPPA and authorized through the CEO or designate.
- d. Access to video surveillance camera digital records by law enforcement agencies will be given in accordance with MFIPPA requirements and the Library's Access to Information and Protection of Privacy Policy and procedures. When recorded images are viewed for law enforcement or investigative reasons, it shall be undertaken by an authorized person, in a private, controlled area that is not accessible to other staff and / or Library users.
- e. Authorized staff and security personnel are required to sign confidentiality agreements specific to video surveillance and this policy.
- f. Any unauthorized access and/or disclosure (privacy breach) shall be immediately reported to the CEO, who, following confirmation, will notify the Information and Privacy Commission of Ontario (IPC) and Library Board, investigate and mitigate.

4. Auditing and Evaluation

The Library will conduct an annual audit to evaluate the need for the video surveillance, its use and compliance with legislation and Library policies and procedures.

5. Training

This policy and related training including obligations under the Act shall be incorporated into LPL and Security Personnel training programs for those staff / personnel authorized to have access to video surveillance equipment and / or computer disks containing images captured. Refresher training programs addressing obligations under the Act and/or this policy shall be conducted as needed.

BACKGROUND:**INQUIRIES:**

Director, Information Technology Services
CEO & Chief Librarian

KEYWORDS:

Privacy, camera, surveillance, confidentiality

RELATED DOCUMENTS:

Municipal Freedom of Information and Protection of Privacy Act
Access to Information and Protection of Privacy Policy
Charter of Library Use
Records Management Policy
Photography/Videography/Filming Policy
Rules of Conduct

DOCUMENT CONTROL:

Approved: May 24, 2006
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