



Dryden Public Library Board

POLICY

SECTION: Operational	NO: OP-24
TITLE: Use of Video Surveillance Systems	Date: May 2024
	Next Review Date: May 2028

1.0 Policy Statement

The Video Surveillance Policy establishes guidelines and procedures for using video cameras for surveillance within the Dryden Public Library.

2.0 Safety and Security

2.1 The Dryden Public Library uses video cameras to keep people safe and deter crime.

2.2 The Video Surveillance System will complement other measures taken by the Board to ensure a safe and secure environment.

3.0 Compliance

3.1 When using the Video Surveillance System, staff must review and comply with Board policy, including this Policy, the Privacy Policy, Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and any other relevant statutes. If staff do not work in compliance, they may be subject to discipline.

3.2 Service providers, such as contractors or technical support providers working on the Library's video surveillance system, must comply with this Policy, the Privacy Policy, MFIPPA, and any other relevant statutes. Service providers that do not comply may be found to be in breach of contract, leading to penalties up to and including contract termination.

4.0 Responsibilities

4.1 Dryden Public Library Board is responsible for:

- The development and review of the Video Surveillance Policy.

4.2 CEO is responsible for:

- Managing the Video Surveillance System.
- Ensuring all staff and service providers follow the Video Surveillance Policy.
- Ensuring signage complies with legislative requirements (*MFIPPA, 29(2)*).

4.3 Systems/Technical Manager

- The Systems/Technical Manager is responsible for the operation of the Video Surveillance System, and for all technical aspects of the equipment, which may include:
 - Installation
 - Maintenance
 - Retention of records
 - Disposal of records
- The City of Dryden IT Manager shall be considered a Systems/Technical Manager for the purposes of this policy.
- The CEO may designate staff or contracted service providers to the role of Systems/Technical Manager; however, the CEO will retain overall responsibility for the video surveillance system and ensuring compliance with this policy.

5.0 Collection of Personal Information

5.1 The Dryden Public Library has determined that it has the authority to collect Personal Information in accordance with section 28(2) of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA):

No person shall collect personal information on behalf of an institution unless the collection is expressly authorized by statute, used for the purposes of law enforcement or necessary to the proper administration of a lawfully authorized activity.

5.2 Specifically, the use of the Video Surveillance System is necessary for the proper administration of a lawfully authorized activity. Namely, the safety and security of:

- Library staff while at work,
- the public while using the Library,
- and the assets of the Library.

5.3 The Library must be able to demonstrate that any proposed or existing collection of personal information by a video surveillance system is in accordance with 5.1.

6.0 Release of Personal Information

6.1 Anyone who has been recorded by the cameras has a general right of access to his or her Personal Information under section 36 of MFIPPA.

7.0 Operation of the Video Surveillance System

7.1 Transparency

- The Dryden Public Library will be as open and transparent as possible about the Video Surveillance System. This will include the usage of signage and may include print handouts or other documentation distributed through the Library's website and/or social media.
- Upon request, the Dryden Public Library will make the following information available to the public:
 - The rationale for the Video Surveillance System
 - The objectives of the Video Surveillance System
 - The Video Surveillance Policy
 - The Privacy Policy

7.2 Security

- The Dryden Public Library will maintain control of and responsibility for the Video Surveillance System at all times.
- The Video Surveillance System will operate in a strictly controlled area.
- Only personnel authorized in writing by the CEO or Systems/Technical Manager will have access to the Video Surveillance System and Reception (Cameras and Video monitors) equipment.
- Video monitors will not be in a position that enables public viewing.

7.3 Installation of Reception Equipment

- Reception equipment will be installed only in:
 - Identified public areas where video surveillance is a necessary and viable detection or deterrence activity.
 - Spaces that have been identified as requiring video surveillance.

7.4 Operation of Cameras

- Cameras will operate up to 24 hours a day, and seven days a week, within the limitations of system capabilities, power disruptions, serviceability and maintenance.
- If cameras are adjustable by users, this adjustment should be restricted. This way cameras cannot be moved to monitor areas that are not intended to be monitored.
- Cameras should never monitor the inside of areas where people have a higher expectation of privacy. This includes, but is not limited to:
 - Washrooms

- Windows of adjacent buildings

8.0 Maintenance

8.1 Staff will promptly follow-up on issues or concerns regarding the equipment.

9.0 Signage

9.1 Signs informing people that cameras are in use must be posted.

9.2 Signage will:

- Be clearly written.
- Be prominently displayed at entrances and throughout the Library.
- Provide people reasonable and adequate warning that cameras are in use.
- Satisfy notification requirements under section 29(2) of MFIPPA, which include:
 - Informing individuals of the legal authority for the collection of Personal Information (*MFIPPA, 28(2)*).
 - The principal purpose for which the Personal Information is intended to be used (*It is used for the purposes of promoting public and staff safety and deterring crime*).
 - The title, business address and telephone number of someone who can answer questions about the collection.

9.3 The remainder of the notification requirements under MFIPPA can be satisfied through information contained in this policy, which is posted to the Library's website.

10.0 Using Video Surveillance System Records

10.1 Acceptable Use

- Video Surveillance System records may only be used to:
 - Protect people; or
 - Assist in the detection and deterrence of crime, including discipline or consequences after the fact.
- The Video Surveillance System will not be used for staff performance reviews.
- Records will not be retained or used for any purposes other than those described in this Policy.

10.2 Review

- Only a Technical Manager or the CEO may review Video Surveillance System Records.

- Circumstances which would warrant review will normally be limited to an incident that has been reported or observed, or to investigate a potential crime.
- Real-time viewing of monitors is for safety purposes only.

10.3 Retention

- Video Surveillance System records will be stored on servers operated by the City of Dryden. The City of Dryden IT Manager oversees the security of the network and servers.
- The retention period for Video Surveillance System records that have not been viewed for law enforcement, Library, or public safety purposes shall be:
 - A minimum of 5 days
 - A maximum of 14 days
- These timeframes are based on risk assessment, privacy considerations, and equipment capabilities.
- Video Surveillance System records that have not been used are routinely erased in a way in which the Records cannot be reconstructed or retrieved.
- Information which has been used, will be kept for one year from its date of use allowing for a period of accessibility for the person to whom the video relates. Viewing a live feed does not count as “use”. If the video is used as a part of legal proceedings, it may be retained longer.

10.4 Logs

- Logs will be kept of all instances of access to, and use of, Video Surveillance System Records to enable a proper audit trail.

10.5 Training

- The Video Surveillance Policy will reviewed with new Dryden Public Library Staff.
- Staff will review the policy as a group refresher once every four years.

10.6 Auditing

- The Dryden Public Library will ensure that the use and security of the Video Surveillance System and Reception Equipment is subject to regular Audits.
- Audits will address the Library’s operational compliance with the Video Surveillance Policy. The CEO will review access logs and interview staff as a part of the audit.

10.7 Evaluation

- The Dryden Public Library Board will regularly review and evaluate its Video Surveillance System to ascertain whether it is still justified.
- This review will include reviewing a history of incidents at the Library and how effective the system has been in dealing with or preventing incidents.
- Evaluation shall occur at least once every 4 years.

Related documents:

Guidelines for the Use of Video Surveillance issued by the Information and Privacy Commissioner of Ontario in October of 2015

Fort Frances Public Library Technology Centre Policy, October 17, 2017.

History			
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