



Dryden Public Library Board

POLICY

SECTION: Operational	NO: OP-24
TITLE: Use of Video Surveillance Systems	Date: January 2021
	Next Review Date: January 2024

1.0 Policy Statement

The Video Surveillance Policy establishes guidelines and procedures for operating a Video Surveillance System within the Dryden Public Library.

The Video Surveillance Policy was developed in close consultation with the document Guidelines for the Use of Video Surveillance issued by the Information and Privacy Commissioner of Ontario in October of 2015. The Video Surveillance Policy is also based on the Fort Frances Public Library Technology Centre Policy approved by the Fort Frances Public Library Board on October 17, 2017.

2.0 Safety and Security

- 2.1 The Dryden Public Library uses a Video Surveillance System to promote the safety of patrons, Staff and the community.
- 2.2 The Video Surveillance System also helps to protect Library property against theft or vandalism and can assist in identifying intruders and persons breaking the law.
- 2.3 Both the Dryden Public Library Board and Staff are committed to the goal of a safe library. This policy outlines one of the processes in place to ensure that the Library is kept as safe as possible. The Video Surveillance System will compliment other measures taken by the Board to ensure a safe and secure environment.

3.0 Compliance

- 3.1 Dryden Public Library Staff must review and comply with DPL Board policy, including the Video Surveillance Policy, the Privacy Policy, Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and any other relevant statutes in performing any duties or functions related to Operating and Monitoring the Video Surveillance System.

3.2 Staff who knowingly or deliberately breach this policy or the provisions of MFIPPA or other relevant statutes may be subject to discipline.

3.3 Service Providers, such as contractors or technical support providers, working on the Library's video surveillance system must comply with the Library's Video Surveillance Policy, the Privacy Policy, MFIPPA, and any other relevant statutes while performing any duties or functions related to Operating and Maintenance the Video Surveillance System.

3.4 Service Providers that knowingly or deliberately breach DPL Board policy or the provisions of MFIPPA or other relevant statutes 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:

- The Board is responsible for the development and review of the Video Surveillance Policy and signage.

4.2 CEO

- The CEO is responsible for the Video Surveillance System.
- The CEO is responsible for ensuring all staff and service providers receive, understand and comply with the Video Surveillance Policy.

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.

4.4 Staff

- Staff members carry out technical activities as instructed by the CEO.

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 The Library must be able to demonstrate that any proposed or existing collection of personal information by a video surveillance system is authorized under this provision under the Act.

6.0 Release of Personal Information

6.1 Any patron, Staff member or member of the public who has been recorded by the Video Surveillance System 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 endeavour to be as open and transparent as possible about the Video Surveillance System in operation. This may include the use of signage, the production of 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 should operate in a strictly controlled area.
- Only personnel authorized in writing by the CEO or Systems/Technical Manager should have access to the Video Surveillance System and Reception 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 Reception Equipment

- Reception Equipment 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 Reception Equipment is adjustable by users Monitoring the Video Surveillance System, this adjustment should be restricted, if possible, so that Reception Equipment cannot be manipulated to monitor areas that are not intended to be monitored by the Video Surveillance System.
- Reception Equipment should never monitor the inside of areas where patrons, Staff and the public have a higher expectation of privacy. This includes, but is not limited to:
 - Washrooms
 - Windows of adjacent buildings

8.0 Maintenance

8.1 The Video Surveillance System and Reception Equipment will receive regularly scheduled maintenance, including:

- Optimizing Record quality
- Lens cleaning
- Verification of proper operation
- Verification of adherence to manufacturer's specifications

8.2 DPL Staff will promptly follow-up on issues or concerns regarding the performance of the equipment.

9.0 Signage

9.1 As a minimum, there will be a sign in place that notifies individuals of the recording and informs them that they may contact the CEO with any questions.

9.2 Signage will:

- Be clearly written
- Be prominently displayed at entrances and in sections of the Library where Reception Equipment is installed

- Provide patrons, Staff and the public reasonable and adequate warning that a Video Surveillance System is in operation
- Satisfy notification requirements under section 29(2) of MFIPPA, which include:
 - Informing individuals of the legal authority for the collection of Personal Information
 - The principal purpose for which the Personal Information is intended to be used
 - 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 pamphlets available at the Dryden Public Library, and through the Library's web site.

10.0 Using Video Surveillance System Records

10.1 Acceptable Use

- Video Surveillance System Records may only be used for the purposes set out in the Video Surveillance Policy, and must either:
 - Relate to the protection of patrons, DPL Staff and the public; or
 - Assist in the detection and deterrence of criminal activity and vandalism, including the discipline or consequences that arise from those activities
- 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 the Video Surveillance Policy.

10.2 Review

- Only a Systems Manager 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 may be delegated by a Systems Manager to a limited number of DPL Staff.

10.3 Retention

- Video Surveillance 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 calendar days

- These timeframes are based on risk assessment, privacy considerations, and equipment capabilities.
- Video Surveillance System Records that have not been used in this fashion and within these timeframes are routinely erased in a manner in which the Records cannot be reconstructed or retrieved.

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

- Where applicable and appropriate, the Video Surveillance Policy will be incorporated into training and orientation programs for new DPL Staff.

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.
- An external body may be retained in order to perform Audits.
- The Dryden Public Library will endeavour to address all deficiencies and concerns identified by Audits as soon as possible.
- Staff and Service Providers should be aware that their activities are subject to Audit, and that they may be called upon to justify their use of any Video Surveillance System Records.

10.7 Evaluation

- The Dryden Board will regularly review and evaluate its Video Surveillance System to ascertain whether it is still justified in accordance with the planning requirements set out in the Video Surveillance Policy.
- Evaluation shall occur at least once every 3 years.
- Evaluation will include a review of the Video Surveillance Policy.

History			
Approval Date:		Approved by:	
Amendment Date:		Approved by:	
Amendment Date:		Approved by:	
Amendment Date:		Approved by:	