VIDEO SURVEILLANCE

Surveillance cameras are widely used in the workplace in Canada. Theft, vandalism, violence, and sexual harassment are all common reasons for installing surveillance cameras. In addition, hidden cameras are utilized to discreetly film suspected criminal or improper behaviour.

The purpose of this policy is to regulate the use of video surveillance and recording on [Organization Name] premises. This policy governs the installation of security cameras in situations and locations where the security and safety of property or people are at risk. This policy prohibits the placement or usage of cameras in places or in ways that breach the law's definition of a reasonable expectation of privacy.

This policy has been created based on Canada’s [Guidelines for Overt Video Surveillance in the Private Sector](https://www.priv.gc.ca/en/privacy-topics/surveillance/video-surveillance-by-businesses/gl_vs_080306/). [Organization Name] also adheres to the guidelines set forth by the *Personal Information Protection Act* (PIPA).

SCOPE

This policy governs the usage of security cameras and video monitoring and recording devices by all employees and departments of [Organization Name].

POLICY

[Organization Name] believes that the need for video surveillance must be measured alongside people's right to privacy, which includes the freedom to live their lives without being watched. Because video surveillance is inherently intrusive, [Organization Name] will examine all less privacy-invasive methods of attaining the same goal before resorting to it.

[Organization Name] has security cameras installed on its premises purely to promote legitimate public safety and security concerns, such as:

* Protecting individuals, property and buildings
* Investigating criminal activities
* Monitoring of building access
* Confirming security and safety alarms
* Monitoring company events

These cameras may be installed inside and outside facilities as needed.

Information gathered by video surveillance will be utilized for security and law enforcement objectives, which must be related to the protection of the employer, workers, visitors, and the general public, or the prevention of suspicious activity or property damage.

Even if physical cameras are identical, the functions of these cameras are divided into two categories:

* Property protection - The basic goal is to record video and save it on a remote device so that if something is reported stolen or damaged, the video can be used to identify the culprit.
* Personal Safety - The primary goal is to record video and save it on a remote device so that if someone is harmed, the video can be used to identify the attacker.

The information gathered by the cameras will be used largely to enforce company policies. Security cameras and the recordings they make may be used to aid local law enforcement and company safety and security employees when it is legally permissible. To prevent unauthorized access, manipulation, or disclosure of data collected by security cameras, cameras must be managed with the proper level of security.

Camera Operation

The use of security cameras must be done in a professional, ethical, and legal manner at all times. Individuals who operate or use security camera footage must follow this policy as well as all other relevant [Organization Name] policies, including but not limited to privacy policies or harassment policies.

Employees may not operate or use security camera footage unless [insert name/department in charge] has given them permission in writing or it is part of their job description. Unauthorized recording equipment operation or use may result in disciplinary action ranging up to and including termination.

[Organization Name] will ensure that operators receive appropriate and continuous training to ensure that they are aware of their responsibilities under all applicable laws, and the organization's video surveillance policy.

Placement of Cameras

* Cameras may be set in places with limited access, such as the building's entryway, but these are not places where a person has a reasonable expectation of privacy. Personal privacy will be protected by the placement of cameras.
* Setup of the camera must be protected to ensure employees or visitors cannot modify or adjust the positioning of the camera.
* Before anyone whose photos may be captured by the cameras enter the premises, [Organization Name] will post a clear and comprehensible notice about the use of cameras on its grounds. If people disagree with the surveillance, they can refuse to enter the premises.
* In places where security cameras have been installed or are in use, [Organization Name] will post signs or provide other reasonable notice to ensure that people are aware of video monitoring.
* The placement of cameras with views of the restrooms will be limited. The view must not infringe on any reasonable expectation of privacy or decency.
* Cameras must never be permanently installed in situations where the maximum level of privacy is expected. Authorised staff may only utilize security cameras in such areas for a limited time if the [insert name/department allocated] has given written approval.
* The following areas, among others, have a higher expectation of privacy:
* Staff private offices
* Comfort Rooms
* Other locations in which the reasonable expectation of privacy outweighs the interest in recording, as determined by [Organization Name].
* In some circumstances, law enforcement approval for the use of cameras may be required, and in those cases, the [insert name/department in charge] will lead the way in coordinating these efforts.
* All video camera installations should be visible to the general public. When a major policy or legal infraction is under investigation and has been approved as needed above, exceptions to notice and visibility may apply.
* For security reasons, the specific placement, number, and function of any cameras will be kept confidential and will not be disclosed to the public, guests, or employees unless required by law.

Access and Monitoring

* All recording and monitoring will be done professionally, ethically, and legally.
* Sound will not be recorded according to the Criminal Code of Canada.
* The subjects shall not be monitored or recorded based on their age, colour, disability, gender, gender identity or presentation, national origin, race, religion, sexual orientation, or any other protected characteristics.
* Under normal operating conditions, [Organization Name] security cameras are not normally monitored continuously, but they may be monitored for legitimate safety and security reasons such as, but not limited to, the following:

1. high-risk areas
2. restricted access areas/locations
3. in response to an alarm
4. special events
5. maintenance purposes
6. functionality purposes, and
7. specific investigations authorised by [insert person/department in charge]

* Individuals have the right to see photos of themselves. When sharing recordings to those who appear in them, [Organization Name] will make sure that no identifying information about other people on the recording is released.
* Requests for video viewing access should be sent to [insert name/department in charge]. In accordance with this policy, the request should specify which camera output and the reason for access.

Confidentiality

* Except for official purposes, personnel are restricted from accessing, viewing, using, or transmitting information obtained from [Organization Name] security cameras.
* All information and/or observations obtained via the usage of security cameras are considered confidential and may only be used for official or law enforcement purposes with [insert name/department in charge's] permission.
* Violations or abuses of this policy may result in disciplinary action, including and up to dismissal. It may also expose the offender to criminal and civil penalties, for which neither [Organization Name] will defend or represent the offender.

Storage and Retention

* [Organization Name] retains ownership of all captured video footage.
* Video surveillance recordings should only be stored for as long as is necessary to achieve the surveillance's goal. Records that are no longer needed will be destroyed. It is the responsibility of [Organization Name] to ensure that the destruction is secure.
* If a recording was used to make a decision about an individual, the recording must be securely retained for a minimum of 1-year to enable the individual to request access/appeal.
* Storage of video surveillance will be retained in accordance with PIPA.

Ongoing Monitoring of this Policy

[Organization Name] will regularly assess this use of surveillance keeping in mind the following three questions:

1. whether the surveillance is effective in addressing the problem it was introduced to deal with;
2. whether the surveillance is minimally invasive or would a less privacy-intrusive way of addressing the problem be effective; and
3. whether the problem still exists.