

Real Property Division (RPD)

Policies

Video Surveillance Policy

Purpose

To ensure that all applications of video surveillance in IWS managed buildings are authorized and are compliant with the [Freedom of Information and Protection of Privacy Act](#) (FOI/POP Act); and the government's [Guidelines for Video Surveillance](#), and to establish standards for security and privacy.

Policy

1. Video surveillance shall be used only when necessary for the protection of the safety of employees, customer occupants, and assets and property managed by IWS.
2. Video surveillance shall be conducted in compliance with the FOI/POP Act and shall be based on the [Privacy Guidelines for Use of Video Surveillance Technology by Public Bodies](#).
3. Video surveillance will not occur in staff lunchrooms, nor in areas where there is an expectation of privacy, e.g., washrooms, change rooms, etc. Note: Cameras in correctional facility cells must have signage displayed advising of cameras.
4. Covert surveillance (i.e., hidden cameras without signage) should only be used when it is determined to be the only available option. See Item 2 under Application.
5. All areas subject to surveillance will be identified to those in the area by way of signage. **See Appendix 1 for suggested wording (below)**. Rooftop cameras also require signage that is visible to the public.
6. Surveillance applications will be monitored by authorized personnel only.
7. Any records (videotapes, still photographs, digital images, etc.) produced by surveillance systems shall be kept in a secure, locked facility or manner and managed and disposed of appropriately by the customer to protect privacy, legal obligations and evidentiary values.
8. Each video surveillance application will document procedures for achieving these principles identified above, the position(s) responsible, and the specifics of the application (e.g., times that cameras are operational, where signage will be located, etc.).

Note: One site is an application if all cameras are being used for the same purpose. If different cameras are being used for different purposes, then they are different applications.

9. "Dummy" (intentionally nonoperational) cameras shall NOT employ signage indicating surveillance is taking place.

Application

1. This policy applies to all buildings owned, leased or administered by IWS on behalf of the Province. If a building is occupied by IWS, IWS is considered the "customer" for the purposes of this policy.

2. This policy does not apply to surveillance activities of law enforcement agencies engaged in a lawful investigation. However, routine video surveillance in court or correctional facilities is subject to the same rules regarding privacy as any other public body. Each application, therefore, still requires that a privacy impact assessment be completed and that requirements of the FOI/POP Act have been addressed.

For covert surveillance, a detailed and comprehensive assessment must be conducted and authorized by a senior level of corporate management and the [Ministry of Technology Innovation and Citizens' Services Information and Privacy Contact](#) prior to the decision to implement. This is to ensure that it complies with the FOI/POP Act, that it is the only available option, and that benefits derived from the material obtained far outweigh the violation to the privacy rights of the subjects being observed.

3. Appropriate signage will be created and installed as part of IWS' usual customer service following a signed Request for Service form or minor client request. **See Appendix 1 for suggested wording (below).**

4. There are certain mandatory requirements that must be fulfilled prior to the installation of video surveillance. **See Appendix 2 Procedures for listed requirements (below).**

Responsibility

Customers requesting the installation of video surveillance will assume all responsibility for the justification, compliance and ongoing administration of surveillance systems, including any recorded material produced. See Policy Items 6 through 8 for a specific listing of these customer responsibilities. Customers are responsible for designating a contact person to ensure compliance with this policy and related procedures. This person will be responsible for communication with appropriate staff and employee representatives (i.e., Unions). Any training required for surveillance purposes will also be the responsibility of the customer.

Prior to the installation of a surveillance system, the appropriate IWS contact person and/or their delegate (e.g. IWS' service provider –Workplace Solutions Inc. (WSI)) shall be responsible for communicating this corporate policy to their customer. In support of their customers, IWS, through its service provider WSI and their regional facilities managers, will assume responsibility for the installation and ongoing maintenance for such systems, as negotiated with the customer, as they would for other tenant improvements.

WSI will ensure that all installations of video surveillance completed by on behalf of IWS will conform to this policy. IWS is responsible for review of the policy and any future revisions.

The Executive Director, Facilities Services Management is responsible for the application of this policy.

Appendix 1 Video Surveillance Signage

Clearly visible signage, identifying the use of video surveillance cameras, must be installed in the building entrance and/or parking garage, and wherever else there are cameras. Each ministry/agency will designate a contact person for each signage application (name to be provided on the Request for Services form).

Suggested Signage Wording:

This area is monitored by video camera. For further information, please contact the WSI Operations Centre at 1-877-222-3112

Appendix 2 Procedures

1. Completion and approval of a Request for Services form, which covers both surveillance equipment and installation as well as appropriate signage.
2. Approval from building owner (if other than IWS).
3. Completion and approval of a [Privacy Impact Assessment form](#) by the customer.