A. PURPOSE

Camera technology is used by Douglas College (the College) to enhance the safety and security of those who work and learn at the College and visit our campuses, and to protect the College’s assets and property. The College is committed to using this technology in a way that respects and safeguards the privacy of members of the College Community.

This policy is intended to ensure that Safety and Security Camera Systems (Camera System(s)) that are operated by the College, and are configured to capture identifiable images of individuals, are implemented and used in compliance with the Freedom of Information and Protection of Privacy Act (FIPPA), other provincial legislation and College records management requirements.

Information obtained through the System will be used exclusively for safety, security and law enforcement purposes, which must relate to the protection of the College Community, or for the deterrence or detection of criminal activity, including theft, vandalism, or other property damage.

B. SCOPE

This policy governs all College-operated Camera Systems that are configured to capture identifiable images of individuals when these Systems are used at premises owned, leased, rented or controlled by the College. This policy applies to all members of the College Community.
Limitation of Scope

This policy does not apply to videoconferencing or other communications systems; technical support of information technology; audiovisual and other systems; academic instruction systems; research projects that have received ethics approval; exam invigilation systems used by the department of Accessibilities Services; and circumstances where all individuals whose images may be captured have provided their informed consent.

C. DEFINITIONS

College Community: All College employees, students and Board members, and any other person who is contractually obligated to comply with College policy; for the purposes of this policy, includes employees of the Douglas Students’ Union.

Covert Cameras: Camera Systems used without notification to the public or the persons being viewed.

Privacy-Intrusive Camera Systems: Camera Systems located in areas where there is a reasonable expectation of privacy (e.g., private work areas, classrooms or offices), and Covert Cameras in all locations.

Responsible Administrator: An executive of the College, or an administrator responsible for the operations of a College department, Faculty, or service area (e.g., a Dean, Director or Registrar).

Safety and Security Camera Administrator: The College administrator responsible for compliance and oversight of the Camera System, namely the Director, Safety, Security and Risk Management (SSRM) or designate.

Safety and Security Camera Coordinator: The College administrator or other designated person responsible for a coordinating role in the installation, maintenance and awareness of Camera Systems at their location: Director, Facilities and Ancillary Services; Manager, Facilities Services; Executive Director, The Training Group; Executive Director, Douglas Students’ Union.

Safety and Security Camera Data: Information captured using the Camera Systems.

Safety and Security Camera Operator: Authorized Security personnel who operate the Camera Systems: includes the Manager, Facilities Services; Director, SSRM; and contractors authorized to conduct installations and repairs to the Camera Systems.

Safety and Security Camera System(s): Any camera installation used exclusively for safety, security and law enforcement purposes, relating to the protection of members of the College Community, or to the deterrence or detection of criminal activity, including theft, vandalism, or other property damage.
D. POLICY STATEMENTS

1. All uses of Camera Systems by the College, including those that fall outside the scope of this policy, are subject to applicable policies and legislation, including the FIPPA of BC. Breaches of this policy may be subject to disciplinary or other actions, and may also constitute a breach of the FIPPA or other legislation, which could result in sanctions against the College or individuals.

2. The College may use Camera Systems to monitor and/or record activities within College-owned or occupied locations to assist in the protection of individuals, assets and property; to assist in the prevention and investigation of criminal activity, injury and property loss, and violations of College policies related to safety and security; to facilitate responses to emergencies, and other serious incidents; and for other purposes permitted under FIPPA and other applicable laws.

3. Camera Systems are one part of the College’s security program, used in its continuing efforts to enhance campus safety and security. The College community should not assume that the presence of Camera Systems on any of its campuses will guarantee safety for persons or property.

4. Except as otherwise permitted under FIPPA, the College strives to ensure that its use of Camera Systems is subject to the following conditions:
   a. other means for achieving the same objectives are substantially less effective than using cameras;
   b. the benefits of using cameras substantially outweigh any privacy intrusion; and
   c. the cameras have been configured to collect the minimum amount of personally identifiable information necessary to achieve the purpose of the collection.

5. The College will use and disclose footage obtained through the Camera System only as authorized by FIPPA, including to address and investigate incidents and to make appropriate reports to law enforcement authorities.

6. Camera Systems are not intended to be used to monitor employees for the purposes of performance management or students for the purposes of detecting academic misconduct.

7. The Director, SSRM is responsible for the secure operation of Camera Systems and the secure storage of recorded Safety and Security Camera Data in accordance with related College policies.

8. Camera Systems and Safety and Security Camera Data may be accessed only by Safety and Security Camera Operators who have been authorized to access or operate these Systems by the Director, SSRM.
9. Privacy-Intrusive Camera Systems will be approved only in rare and exceptional cases where permissible under FIPPA and where clear and specific grounds exist to make their use necessary.

10. Except for Covert Cameras, Camera Systems must not be hidden or disguised. Signage must also be displayed at the perimeter of surveillance areas so that individuals have reasonable warning before entering a monitored area.

11. The College must post a public notification on its website providing the purpose(s) for the use of its Camera Systems; the legal authority for the collection of information using these Camera Systems; and the title, business address, business telephone number and email address of a College employee who can answer questions about the collection of information.

E. PROCEDURES

   Standard Operating Procedures (for internal users only)

   • Safety and Security Camera Systems

F. SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES

   Administration Policies

   • Acceptable Use of Computer and Information Technology
   • Information Security Policy
   • Occupational Health and Safety
   • Privacy
   • Records and Information Management

G. RELATED ACTS AND REGULATIONS

   • Freedom of Information and Protection of Privacy Act [RSBC 1996], c. 165
   • Public Sector Video Surveillance Guidelines

H. RELATED COLLECTIVE AGREEMENTS

   • Collective Agreement between Douglas College and the British Columbia Government and Service Employees’ Union (BCGEU)
   • Collective Agreement between Douglas College and Douglas College Faculty Association (DCFA)