

**SAFETY AND SECURITY CAMERA SYSTEMS**

<b>Policy Name:</b> Safety and Security Camera Systems	<b>Responsible Owner:</b> Vice President Administrative Services and CFO	<b>Created:</b> 2018 Apr
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**TABLE OF CONTENTS**

- A. PURPOSE**
- B. SCOPE**
- C. DEFINITIONS**
- D. POLICY STATEMENTS**
- E. PROCEDURES**
- F. LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES**
- G. RELATED ACTS AND REGULATIONS**
- H. RELATED COLLECTIVE AGREEMENT CLAUSES**

**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 (“System”) 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 students, employees, and the public, or the deterrence or detection of criminal activity, including theft, vandalism, or other property damage.

**B. SCOPE**

This Policy governs the use of all College-operated Safety and Security Camera Systems, at premises, owned, leased, rented or controlled by the College that are configured to capture identifiable images

of individuals. Excluded from the scope of this policy are: videoconferencing or other communications systems; technical support of information technology; audiovisual and other systems; academic instruction systems; research projects that have received ethics approval; Centre for Students with Disabilities (CSD) exam invigilation systems; and circumstances where all individuals whose images may be captured have provided their informed consent.

This Policy applies to all College employees, the Douglas Students' Union and independent contractors.

### C. DEFINITIONS

1. **Covert Cameras:** Camera Systems used without notification to the public or the persons being viewed.
2. **Director, SSRM:** The College's Director, Safety, Security and Risk Management, or designate.
3. **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.
4. **Responsible Administrator:** An executive of the College, or an administrator responsible for the operations of a College Department, Faculty, or service area, e.g., Dean, Director, Registrar.
5. **Safety and Security Camera Administrator:** Director, SSRM
6. **Safety and Security Camera Coordinator:** Director, Facilities and Ancillary Services; Manager, Facilities Services; Executive Director, The Training Group; Executive Director, Douglas Students' Union.
7. **Safety and Security Camera Data:** Information captured using Safety and Security Camera Systems.
8. **Safety and Security Camera Operator:** authorized Security personnel that operate Safety and Security Camera Systems; Manager, Facilities Services; Director, SSRM; and contractors authorized to conduct installations and repairs to Safety and Security Camera Systems.
9. **Safety and Security Camera System or Systems:** any camera installation used exclusively for safety, security and law enforcement purposes, relating to the protection of students, employees, and the public, or 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 BC Freedom of Information and Protection of Privacy Act (FIPPA). 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 Safety and Security Camera Systems to monitor and/or record activities within College-owned or occupied locations to: assist in the protection of individuals, assets and property; assist in the prevention and investigation of criminal activity, injury and property loss, and violations of College policies related to safety and security; facilitate responses to emergencies, and other serious incidents; and for other purposes permitted under FIPPA and other applicable laws.
3. Safety and Security 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 the Safety and Security 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 the System 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 System only as authorized by FIPPA, including to address and investigate incidents and to make appropriate reports to law enforcement authorities.
6. Safety and Security 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 Safety and Security Camera Systems and the secure storage of recorded Safety and Security Camera Data in accordance with related College Policies.
8. Safety and Security Camera Systems and Safety and Security Camera Data may only be accessed 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 only be approved in rare and exceptional cases where permissible under FIPPA and where clear and specific grounds exist that make it necessary to use them.
10. Except for Covert Cameras, Safety and Security 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 Safety and Security Camera Systems; the legal authority for the collection of information using these Safety and Security 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

### [Internal Standard Operating Procedures](#)

- Standard Operating Procedures for Safety and Security Camera Systems

## F. LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES

### [Administrative Policies Page](#)

- Acceptable Use of Computer and Information Technology
- Compliance with the Freedom of Information and Protection of Privacy Act
- Health and Safety
- Information Security Policy
- Records and Information Management

## G. RELATED ACTS AND REGULATIONS

- [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#)
- [Public Sector Video Surveillance Guidelines](#)

## H. RELATED COLLECTIVE AGREEMENT CLAUSES

Collective Agreement between Douglas College and British Columbia Government and Service Employees' Union (BCGEU) (July 1, 2014 to June 30, 2019), Art. 25.14