



Name:	Video/Image/Data Recording and Surveillance Policy
Origin:	Facilities Management
Approved:	Board of Governors
Approval Date:	June 24, 2021
Issuing Authority:	Board of Governors
Responsibility:	Facilities Management

A. Purpose

The purpose of this policy is to regulate the use of Surveillance Equipment, including closed circuit television cameras and other video monitoring and recording equipment systems used to monitor and record public and restricted areas of the University of King's College ("King's") property, for the purposes of enhancing the health, safety, and security of students, faculty, and staff, and the protection of physical property of the University.

B. Application

This Policy applies to the use of Surveillance Equipment to monitor and record public and restricted areas.

C. Definitions

In this Policy:

"Director" means the Director of Facilities Management.

"Surveillance Equipment" means any closed-circuit television cameras and any other video/image monitoring and recording equipment systems used to monitor and record public and restricted areas on King's property. This also includes any system to monitor and record an individual's identifying information when accessing public and restricted areas on King's property.

"Public area" means any area open to and frequented by the public.

"Restricted area" means any area from which the public is restricted for safety or security reasons unless specially authorized (e.g. residences).

D. Policy

1. Subject to this Policy, the King's Department of Facilities Management has sole authority to oversee and coordinate the use of all Surveillance Equipment on King's property.
2. Video/image monitoring and recording under this Policy will be designed and operated in a manner that minimizes privacy intrusion and that is absolutely necessary to achieve its lawful goals.
3. Information obtained through video/image monitoring or recording will be used for University security, health and safety, and law enforcement purposes only. For greater certainty, video/image monitoring and recording will not be used for employee performance purposes, except as specifically authorized pursuant to sections 11-17, below.
4. All information obtained through video/image monitoring and recording is confidential and will only be released when authorized by the Director or the Bursar.
5. Facilities Management will be responsible for ensuring that all persons involved in the use of Surveillance Equipment at King's will be appropriately trained and supervised in the responsible use of this technology.
6. All existing uses of video/image monitoring and recording will be brought into compliance with this Policy within 12 months of the approval of this Policy.

E. Procedures

Installation of Surveillance Equipment

7. The authorization for the installation of Surveillance Equipment lies with the Director. No one is authorized to install, or to arrange to be installed, any Surveillance Equipment unless such installation has been approved in advance by the Director.

Public Awareness of Surveillance Equipment

8. In locations where Surveillance Equipment is in use, signs must be posted in an appropriate area, either at the entrance to the area under surveillance, or in close proximity to the camera.
9. If the Surveillance Equipment is recording, the following sign will be displayed:

*This area is being **RECORDED** by closed-circuit television.*

If the Surveillance Equipment is not recording but being monitored on a screen, the following sign will be displayed:

*This area is being **MONITORED** by closed-circuit television.*

10. Each sign will include contact information for the Director to inquire about the surveillance or recording and to request access to their image. The following wording should appear on the bottom of the sign:

Further information may be obtained from the Director of Facilities Management at [the appropriate phone number].

Covert Surveillance

11. Covert surveillance (hidden cameras without signage) will be used only in exceptional cases and only with the approval of the President.
12. Where it appears that covert surveillance may be required, the Director will first conduct an assessment of the specific circumstances of the situation and make a recommendation to the Bursar.
13. The Director's assessment must demonstrate that covert surveillance is the only available option in the circumstances, that the benefits derived from the information obtained would far outweigh the violation of privacy of the individuals observed and that covert surveillance is not otherwise in violation of the law.
14. Surveillance Equipment will be positioned in a way that minimizes unnecessary surveillance (e.g. in the case of an ongoing computer theft problem, the camera will be positioned so that individuals will be recorded only if they approach the equipment of concern).
15. In all cases, covert surveillance will be time limited.
16. In all cases, covert surveillance will not be used in residential areas or areas where the public is afforded the expectation of privacy (e.g. residence rooms, bathrooms).
17. All documentation regarding covert surveillance will be subject to accountability measures as outlined in sections 24-26.

Requests to View Recordings and Access Control Data

18. Only trained individuals working in the Department of Facilities Management are permitted to operate Surveillance Equipment and access live or recorded material and access control data. However, in exceptional circumstances, the Director may designate other specific individuals at King's to operate Surveillance Equipment and access live or recorded material and access control data.
19. Notwithstanding section 17, all requests by University Administrators or law enforcement agencies to view recorded information and access control data must be made to and are subject to the approval of the Director or the Bursar. Where permission is granted to view recorded material and access control data, that material must be viewed in the presence of an individual authorized by the Director or the Bursar.
20. All other requests to view recorded information must be made as a Freedom of Information and Protection of Privacy application to the University, or from a law enforcement official in the form of a production order or warrant.

Safeguards

21. All recordings produced by Surveillance Equipment will be kept in a secure manner or locked facility and managed appropriately by the Department of Facilities Management to protect legal obligations and evidentiary value.
22. If a copy of a recording must be made for evidentiary purposes, it must be copied onto a permanent storage medium (such as a DVD or USB) and be physically labeled with the date, time, and location of the surveillance. No other copies of surveillance recordings, other than those needed for back-ups or evidentiary purposes may be made.
23. Recordings from the surveillance cameras will be kept for a maximum of 90 days unless otherwise required for the purposes outlined in this Policy. Recordings will be erased or otherwise destroyed at that point unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Director.

Accountability

24. A log will be kept by the Department of Facilities Management with regard to the use of Surveillance Equipment, to be kept for a minimum of 10 years. This log will reflect all instances where:
 - a) a member of the Department of Facilities Management or person designated under section 18 views a recording,
 - b) a request is made to view a recording,
 - c) the Director or Bursar denies a request to view a recording and the reasons for the denial,
 - d) the Director or Bursar permits an individual to view a recording (this will include the reason the request was granted, who viewed the recording and when, and who from Facilities Management was present during the viewing), and
 - e) the Director or Bursar releases a recording to a law enforcement agency.
25. The Director will provide an annual report to the Bursar regarding this policy. This report will be made available to the senior administrative team, the Sexualized Violence Prevention and Response Officer (SVPRO), the Equity Officer and the President, and will include:
 - a) all requests to install new Surveillance Equipment,
 - b) all new Surveillance Equipment installations,
 - c) any removal of Surveillance Equipment,
 - d) all information under section 22 of this Policy,
 - e) recommendations for revisions to this Policy, if necessary, and
 - f) any other information which may be relevant to the operation of this Policy.
26. A summary of the annual report will be provided to the Board of Governors.
27. This Policy will be reviewed and updated at least once per year by the Occupational Health and Safety Committee.