



Woodstock Public Library Policy

Policy Name: Video Surveillance Policy

Category: Library Services

Version: 17 November 2020

POLICY STATEMENT AND RATIONALE

The purpose of this policy is to describe Woodstock Public Library's installation and use of video surveillance equipment in the interests of privacy, public safety, protection of property, and to maintain a safe and welcoming environment for library customers, staff, and service providers.

This policy should be read in conjunction with the Library's *Access to Information and Protection of Privacy Policy*.

SCOPE

This policy shall apply to all Woodstock Public Library employees and service providers. It applies to all types of video camera systems and camera recording devices that are used for security purposes at the Library. This policy does not address instances where Library staff record a specific event (such as a program or presentation).

DEFINITIONS

In reading and interpreting this policy, the following definitions shall apply;

“*CEO*” means the Chief Executive Officer of the Woodstock Public Library.

“*IPC*” – Information and Privacy Commission of Ontario. IPC oversees compliance with the privacy protection provisions of MFIPPA and conducts investigations into privacy complaints. IPC also provides guidance regarding Ontario's access and privacy legislation.

“*Library*” means the Woodstock Public Library.

“Library Board” means the Woodstock Public Library Board.

“MFIPPA” – Municipal Freedom of Information and Protection of Privacy Act. The purpose of the Act is to provide a right of access to information under the control of institutions and to protect the privacy of individuals with respect to personal information about themselves held by institutions.

“Personal Information” means any recorded information about an identifiable individual, including:

- a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual;
- b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- c) any identifying number, symbol or other particular assigned to the individual;
- d) the address, telephone number of the individual;
- e) the personal opinions or views of the individual except if they relate to another individual;
- f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the individual; and
- h) the individual’s name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

POLICY, PROCEDURE AND IMPLEMENTATION

1.0 Responsibility

- 1.1 The CEO is responsible for the Library’s privacy obligations under the *Municipal Freedom of Information and Protection of Privacy Act*.

- 1.2 The CEO is responsible for implementing the appropriate procedures in order to ensure that the Library staff understand and adhere to the intent of this policy and to protect and safeguard patron privacy, and to safeguard Library property.

2.0 Authority

- 2.1 The Library has determined that it has the authority to collect personal information in accordance with the *Public Libraries Act* and *MFIPPA*.
- 2.2 Security cameras can be used to collect personal information about identifiable individuals.
- 2.3 Pursuant to section 28(2) of the *MFIPPA*, no person shall collect personal information on behalf of the Library unless the collection is expressly authorized, used for the purposes of law enforcement or necessary to the proper administration of a lawfully authorized activity.

3.0 Underlying Principles

- 3.1 The security camera system is a resource used by the Woodstock Public Library Board within the Board's jurisdiction to promote the safety of patrons, staff and community members. Where deployed for that purpose, these systems also help to protect Library property against theft or vandalism, and can assist in the identification of intruders and of persons breaking the law.
- 3.2 In the event of a reported or observed incident, the review of recorded information may be used to assist in the investigation of the incident. The Library will maintain control of and responsibility for the security camera system at all times.
- 3.3 Library Staff and service providers are expected to review and comply with this Policy, *MFIPPA*, and other relevant statutes in performing any duties and functions that are related to the operation of the security camera system.

4.0 Privacy

- 4.1 The Library will endeavor to ensure that the proposed design and operation of the video security surveillance system reasonably minimizes privacy intrusion.
- 4.2 Video security camera footage will not be used to monitor customers' use of Library spaces or employee performance. Circumstances which warrant review will be limited to security incidents that have been reported,

reported behaviour that contravenes the Library's Patron Code of Conduct, in the investigation of a potential crime, or identifying individuals associated or potentially involved with a crime.

- 4.3 Video equipment shall never monitor the inside of areas where the public and employees have a higher expectation of privacy (e.g. staff room and washrooms).

5.0 Authorized Access to Security Camera System

- 5.1 Only the CEO and other authorized staff may access and review recorded information from the system.

6.0 Logs

- 6.1 Logs will be kept of all instances of access to, and use of, recorded material to enable a proper audit trail. The log will record the name of the staff person, accessing the system, date, time, circumstances and activity.

7.0 Notice of Use of Security Camera System

- 7.1 In order to provide notice to individuals that video is in use, the Library shall post signs, visible to members of the public, at entrances and/or prominently displayed on the perimeter of the grounds under security camera coverage. Signage will include the following information:

- a) the legal authority for the collection of personal information;
- b) the principal purpose(s) for which the personal information is intended to be used; and
- c) the title, business address, and telephone number of someone who can answer questions about the collection.

8.0 Access Requests Process

- 8.1 Requests to access information on the security camera system will be done in accordance with the Library's Privacy Policy, and are subject to the requirements of MFIPPA.
- 8.2 All requests for video recordings from the public and law enforcement agencies shall be directed to the Library CEO.

9.0 Unauthorized Access and/or Disclosure (Privacy Breach)

- 9.1 Any Library staff member who becomes aware of unauthorized disclosure of a video record in contravention of this policy, and/or a potential privacy breach has a responsibility to ensure that the CEO is immediately informed of the breach.
- 9.2 Any breaches of unauthorized access or disclosure of privacy will be reported to the IPC for advice and assistance.

RELATED DOCUMENTS AND POLICIES

Woodstock Public Library – Access to Information and Protection of Privacy Policy Public Libraries Act, 2011, S.O. 2001, c. P. 44
Municipal Act, 2011, S.O. 2001, c. 25
Municipal Freedom of Information and Protection of Privacy Act, RSO, 1990, c. M.56

DOCUMENT REVISION RECORD

Developed By:	D. Harvie	Date:	November 17, 2020
		Adoption Date:	January 12, 2021
Resolution #:	21-03	Effective:	January 12, 2021
Review Cycle:	Once per Term	Last Reviewed Date:	January 12, 2021