

CCTV SURVEILLANCE SYSTEMS POLICY

Policy Section & Number:	Facilities & Asset Management	Effective Date:	June 25, 2024
Policy Owner:	Vice President Corporate Services and Chief Financial Officer	Last Revised:	January 15, 2024
Policy Administrator:	Director Facilities	Review Scheduled:	Every 4 years
Approver:	Executive Committee		
<i>The official controlled version of this document is held with the Legislative Compliance / Policy & Procedure Coordinator.</i>			

A. POLICY STATEMENT

Keyano College owns and operates a close circuit television camera system (CCTV) also known by its product name “Milestones”, throughout its campuses and properties. The CCTV surveillance system is motion activated for recording and stores the records.

1. OVERVIEW

- 1.1 This Policy details the purpose, use and management of the CCTV system at the College and details guiding principles to be followed to ensure that the College faculty, staff, students, and visitors comply with all relevant legislation and the current guidance issued by the Office of the Information and Privacy Commissioner of Alberta.
- 1.2 College will consult the Freedom of Information and Protection of Privacy Act of Alberta (*FOIP Act*) and any subsequent information and data protection legislation.
- 1.3 The purpose of the College CCTV is as follows:
 - a) The prevention, reduction, detection and investigation of crime and safety incidents.
 - b) To promote the safety of staff, students, and visitors.
 - c) Monitor the security of all College buildings, public rooms and areas.
 - d) The monitoring and enforcement of parking and traffic related matters.
- 1.4 This Policy applies to all College CCTV surveillance systems.
- 1.5 Excluded from this Policy are any recordings associated with academic, research or marketing programs.

2. GUIDING PRINCIPLES

- 2.1 College recognizes the need to strike a balance between the individual's rights to be free from unwarranted invasion of privacy and the duty to promote a safe environment for all College community.
- 2.2 Staff, students and users of College Facilities and properties understand they are on and using a supervised environment where a reasonable and limited degree of monitoring is appropriate.
- 2.3 CCTV Surveillance equipment will be placed only in public areas, where those under surveillance would have no reasonable expectation of privacy (i.e., rest rooms, change and locker rooms),
- 2.4 College looks to operate its CCTV surveillance system in a manner that is consistent with respect to the individual's privacy in accordance with *Freedom of Information and Protection of Privacy Act*.

3. Data Protection

- 3.1 College's administration of the CCTV surveillance system complies with *FOIP* and the principles of Guide to Using Surveillance Cameras in Public Areas (link available in section Related Documents).
- 3.2 No personal information will be retained beyond a reasonable timeframe (best practice with minimum of 30 days) unless required for follow on investigations or administration action required by the College. Manager of Security Services is responsible for authorizing such need.
- 3.3 The proposed operation of the CCTV surveillance system creates no greater privacy intrusion than is necessary to achieve its goals.
- 3.4 The use of a surveillance camera should only be justified on the bases of specific reports of incidents of crime (vandalism, theft, vagrancy) safety concerns or other compelling circumstances.

4. Signage

- 4.1 Signage will be placed in main entrances to parking lots and pedestrian entrances - including information boards to inform students, staff and visitors that video surveillance is in operation.
- 4.2 Signage will be reviewed yearly to ensure it complies with *FOIP*.

5. Monitoring

- 5.1 The Manager of Security Services is responsible for the overall oversight operation of the Keyano College CCTV surveillance system, including recording, reviewing, retention, monitoring and compliance with *FOIP*.
- 5.2 All staff involved in the operation of the College's CCTV surveillance system will be instructed on this Policy and the authorized use of the information from it.
- 5.3 Any unauthorized misuse of this information is subjected to disciplinary action as per *Progressive Discipline Policy and Employee Progressive Discipline Procedure*.
- 5.4 All images recorded by the CCTV surveillance system remain the property of College.

6. Disclosure of Data

- 6.1 Access to recorded information is highly controlled and is only permitted in accordance with this Policy. Imagery or information may not under any circumstances be sold or used for private or commercial purposes.
- 6.2 In limited circumstances, it may be appropriate to disclose images to a third party, such as the RCMP/law enforcement agency, including any administrative legal proceedings, in relation to the prevention or detection of crime, misconduct that results in disciplinary action or in other circumstances where Reference B either requires or permits discretion to disclose personal information. Any such disclosures will only be authorized by the Manager of Security Services. Form (*Appendix A-CCTV Video Request Form*) will need to be filled and submitted with the request.
- 6.3 Where a reasonable suspicion of student misconduct arises and with a formal request in writing, *CCTV Video Request Form* from the Associate Vice President Academics & Student Experience or higher, the Manager of Security Services may provide access to images for use in student disciplinary cases. These images will form part of the investigation and will be returned and disposed of by the Manager of Security Services.
- 6.4 Where a reasonable suspicion of employee misconduct arises and with a formal request in writing, *CCTV Video Request Form*, from the Associate Vice President People and Culture or higher, the Manager of Security Services may provide access to images for use in staff disciplinary cases/ These images will form part of the investigation and will be returned and disposed of by the Manager of Security Services.
- 6.5 In the course of an investigation by the Manager of Security Service may use images of a suspect or person of interest for the purpose of identification. This image will remain in the care and control of the Manager of Security Services and will not be made public.
- 6.6 In all aforementioned cases, at the discretion of the Manager of Security Services only the extraction of single images from the video captured will be provided with editing to remove any personal information not relevant to the subject matter in question.

7. Covert Cameras

- 7.1 The use of covert cameras will be limited to circumstances when a series of criminal acts have taken place in a particular area that is not otherwise covered by current CCTV. The Manager of Security Services will be consulted to authorize the use of College owned and operated covert cameras,
- 7.2 The Manager of Security Services should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert cameras.
- 7.3 Covert recordings will only take place where there are reasonable grounds to suspect that illegal or unauthorized activity is taking place. All such monitoring will be fully documented and will only take place for a set and reasonable period.
- 7.4 All imagery collected will be handled and disposed of in accordance with this Policy.

8. Concern and Complaints

- 8.1 Any concern or complaint regarding Keyano College CCTV is to be directed to the Manager of Security Services.

- 8.2 All appeals of a decision of the Manager of Security Services regarding a College's CCTV surveillance system shall be made in writing to the Director Facilities.

B. DEFINITIONS

- (1) **College:** means Keyano College
- (2) **Covert Surveillance:** means the secretive continuous or periodic observation of persons, vehicles, places, or objects to obtain information concerning the activities of individuals which is then recorded in material form, including audio, video, photographs, or images
- (3) **Disclosure:** means the release of relevant information. Disclosure includes viewing or making a copy of a recording of images and / or audio
- (4) **Personal Information:** means as in Alberta FOIP Act Section 1 - as recorded information about an identifiable individual, including the individual's race, colour, national or ethnic origin, age or sex, individual's inheritable characteristics, information about an individual's physical or mental disability and any other identifiable characteristic listed in this Policy
- (5) **Policy:** means the CCTV Surveillance Systems Policy
- (6) **Reception Equipment:** means the equipment or device used to monitor, or record information collected through a surveillance system
- (7) **Records:** means as defined in Alberta FOIP Section 1(q) as a record of information in any form and includes notes, audio-visual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded, or stored in any manner, but does not include software or any mechanism that produces records. For our general reference this includes digitally recorded or stored media such as images, video and or audio recordings
- (8) **Storage Device:** means a mechanical or electrical device or system used to store the recorded visual images and or audio from a surveillance system
- (9) **Surveillance System:** means a mechanical or electronic system or device that enables monitoring, recording, recognition or analysis of visual images and or audio. Image recognition is the ability of the system to recognize and identify objects, places, people, text and actions through artificial intelligence. Surveillance systems include for our purposes, close circuit cameras in open and covert installations and singular use imagery capturing systems

C. RELATED POLICIES

- Code of Conduct Policy
- Progressive Discipline Policy

D. RELATED LEGISLATION

- *Freedom of Information and Protection of Privacy Act of Alberta*
- *Personal Information Protection Act*
- *Privacy Act*
- *Security Services and Investigators Act*

E. RELATED DOCUMENTS

- [Guide to Using Surveillance Cameras in Public Areas \(June 2004\)](#)
- Appendix A to this Policy – Keyano College CCTV Video Request Form
- Employee Progressive Discipline Procedure

F. REVISION HISTORY

Date (mm/dd/yyyy)	Description of Change	Sections	Person who Entered Revision (Position Title)	Person who Authorized Revision (Position Title)
1/11/2024	<p>NEW POLICY.</p> <p>Old policy 6.3 College Security with outdated information to be rescinded.</p> <p>New KC Security Policy will be drafted, as we don't have formally one published.</p>	ALL	Manager Security Services	Director Facilities

APPENDIX A

REQUEST FOR COPY/VIEW OF CCTV FOOTAGE

Pursuant to Keyano College policy, all requests for a copy or viewing of any video surveillance (CCTV Footage) on the property of Keyano College, Keyano College Land Trust Corporation or properties rented, leased or otherwise occupied by the College must be approved by the Security Manager of the College to be released. All Requests must be received via email sent to security@keyano.ca. Any request from a Government agency (OHS, RCMP, RES etc.) must come from the organizations official email accounts.

Date Request Received: _____

Name of Person Requesting: _____

Is The Person Affiliated with Keyano College? How?

If Not, Occupation: _____

If RCMP/RES/Gov.-Department.: **(File Number required)** _____

Badge or Identification # **(Required)** _____

Requestors Email & Contact #: **(Required)** _____

Date(s) of Video Required: _____ Approx. Time Range(s): _____

Detailed Reason for Request: **(MUST FILL OUT)**

KEYANO COLLEGE AUTHORITY SIGN OFF

Name: _____

Title: _____



Policy

Signature: _____

Date Approved: _____