



POLICY:  <b>Video Surveillance System (VSS) Policy</b>		POLICY NUMBER:  <b>GA-6</b>
		PREVIOUS/REPLACES:  <b>New</b>
APPROVED BY:  <b>Executive Council</b>	EFFECTIVE DATE AS OF:  <b>July 4, 2024</b>	PRIOR VERSIONS:  <b>New</b>

**1. Policy Statement:**

The Manitoba Institute of Trades and Technology (to be referred to as MITT) is committed to promoting and maintaining a safe and secure environment for all those who work, study and visit MITT. The purpose of this policy is to regulate the use of video surveillance systems (VSS) at all MITT campuses. VSS is used to enhance safety and security through state-of-the art technology to afford the following:

- a. Enhancement to the protection of individuals, property and buildings;
- b. A visual deterrent to crime;
- c. Confirmation of alarms;
- d. Virtual patrol of public areas;
- e. To assist in the identification of individuals who may breach MITT policies;
- f. Reduce the fear of crime;
- g. Assistance in the investigation of criminal activity; and
- h. Identify criminal activity and dangerous events.

Information obtained through video monitoring will be used for internal investigations, security and law enforcement purposes. Information obtained through video monitoring will only be released to the appropriate authorities when authorized by the Director of Capital and Facilities. Consultation with MITT’s Information and Privacy Officer may occur in some instances before release of information.

Video monitoring for the following purposes are not subject to the provisions of this policy:

- Cameras used for academic purposes. Cameras used for research are governed by other policies involving human subjects and therefore excluded from this policy;
- The use of video equipment to record public performances or events, interviews, or other use for broadcast or educational purposes.



MITT recognizes the need to strike a balance between the individual's right to privacy and MITT's duty to provide a safe and secure environment. The use of VSS results in the collection of personal information in the form of images and records the conduct of individuals. MITT's installation, monitoring, and recording of VSS systems is in accordance with this policy, applicable provincial and federal privacy legislation, and related MITT policies.

Video monitoring for security purposes will be conducted in a professional, ethical and legal manner. Monitoring individuals based solely on race, nationality, gender, religion, ethnicity, political belief, age, marital or family status, sexual orientation, disability or other similar characteristic is prohibited.

All personnel involved in VSS monitoring will perform their duties in accordance with the VSS policy and procedures.

## **2. Scope:**

This policy applies to all members of the MITT community including but not limited to:

- All MITT employees;
- All MITT students;
- All MITT Governing Board Members;
- Volunteers and visitors to MITT;
- All other persons who provide goods, services, facilities on behalf of MITT.

## **3. Procedure:**

### **3.1 Responsibilities**

- a. The Manager, Safety and Security Operations is responsible for all VSS monitoring for the purposes of enhancing safety and security on MITT campuses where VSS cameras are used. Security Services is responsible for the administration and daily operation of all VSS's.
- b. Only Security Services staff or other staff as designated by the Director of Capital and Facilities, Sr. Manager Facilities, or Manager, Safety and Security Operations are authorized to operate or monitor cameras at any time.
- c. The Manager, Safety and Security Operations is responsible for the development and update of VSS specification standards, camera and related infrastructure, installation of video recording devices and related maintenance, video data storage, responsible for training personnel and guidance in the use of this technology, and providing on-line and remote access to individuals authorized to operate or monitor the cameras.



- d. The Manager, Safety and Security Operations in conjunction with the Security Services staff are responsible to ensure that the implementation and operation of each camera complies with this policy and its procedures.

### **3.2 Camera Installation**

Requests for VSS installation and monitoring must be made to the Director of Capital and Facilities, Sr. Manager Facilities, or the Manager, Safety and Security Operations.

- a. Deans, Directors, and Department Heads may request permanent VSS installations in areas under their responsibility.
- b. Security Services will assess each request while remaining mindful of all privacy concerns and compliance with legislation. A recommendation will be made and if approved would consider when and how equipment should be deployed. No installation will be made without joint consultation of the individual that oversees or manages the area where cameras are to be located.

### **3.3 Covert Cameras**

If there is reason to suspect that criminal or illegal activity may be occurring, the Director of Capital and Facilities may make a request to the Vice-President, Finance and Campus Services for temporary or covert installation of VSS cameras. In such cases, the appropriate Dean, Director or Department Head would be notified of the installation. Covert cameras will only be installed where:

- a. Installation is for law enforcement purposes;
- b. Informing the individual(s) concerned that the recording is taking place would seriously prejudice the reason for making the recording;
- c. There is good cause to suspect that an illegal or unauthorized action(s) is taking place or is about to take place;
- d. Any such monitoring will only be carried out for a limited and reasonable amount of time, consistent with the objective of the monitoring, and only for a specific unauthorized activity; and
- e. In such cases no signage will be posted.



### **3.4 Disclosure of Video Recordings**

Disclosure of a video recording to any party will only be made in accordance with the purpose(s) for which the system was installed.

- a. Disclosure of Video Recordings to MITT Staff
  - Disclosure of video recordings within MITT may be needed for a variety of reasons such as but not limited to:
    - For use at a formal MITT proceeding such as a student appeal hearing.
    - For members of staff involved in MITT disciplinary processes.
    - To comply with a Freedom of Information request by the person whose identity has been recorded who shall have the right to access the information unless an exemption under FIPPA applies.
    - Other circumstances as approved by the Manager, Safety and Security Operations.
  - All requests for information will require the submission of a MITT VSS Disclosure Request Form to the Manager, Safety and Security Operations. The Manager, Safety and Security Operations will assess the request and make a recommendation to the Director of Capital and Facilities who will have final decision making authority to release the video. Consultation with MITT's Information and Privacy Officer may occur in some instances before release of information. Those requesting a disclosure must be at a minimum at the equivalent level of an Academic Manager, Dean, or Director.
- b. Disclosure of Video Recordings to External Third parties
  - Disclosure of video recordings to external third parties may include the following but is not limited to the following:
    - Police and other law enforcement agencies where the recordings could assist in a specific criminal enquiry.
    - Prosecution agencies.
    - Relevant legal representatives.
    - People whose images have been recorded and retained, unless an exemption under FIPPA applies.
    - To assist in the identification of a victim, witness or perpetrator in relation to a criminal incident.
  - All requests for information will require the submission of a MITT VSS Disclosure Request Form to the Manager, Safety and Security Operations. The Manager, Safety and Security Operations will assess the request and make a recommendation to the Director of Capital and Facilities who will have final decision making authority to release the video. Consultation with MITT's Information and Privacy Officer may occur in some instances before release of information.

### **3.5 Image Storage and Retention**

- a. All video or digital recordings will be maintained by Security Services for a minimum of 30 days and a maximum of 90 days after which time the recording will be deleted.
- b. Video recordings may be stored in the cloud.



- c. Should an event that requires investigative proceedings take place, the information will be identified and copied.
- d. Recordings used for evidence in any criminal or civil proceedings at MITT will be retained until any subsequent appeal period has expired.
- e. Recordings used for any other purpose (e.g., internal investigation) shall be retained at a minimum until the completion of the investigation including any appeal options. MITT will follow the guidelines on the Retention of School Division Records as published by the Government of Manitoba.

### **3.6 Video Recordings and Privacy**

- a. Monitoring of public areas for security purposes at MITT will be conducted in a manner that complies with all Canadian federal and provincial privacy legislation and MITT policies.
- b. Excluding specific investigations that require covert VSS applications (see section 3.3 of this policy), signage will be clearly posted at any public location where there is VSS monitoring.
- c. Cameras will be situated in identified public areas. Cameras will not monitor areas where individuals have a reasonable expectation of privacy such as but not limited to washrooms, change rooms, shower facilities and private offices.
- d. Cameras will be placed strategically and will not be deployed in a “wholesale” manner. Excluding specific investigations that require covert VSS applications, cameras must be located in visible locations.
- e. No attempt will be made to alter any part of an original recording, and cameras must be located securely such that they are not easily tampered with.
- f. Recording devices will be located in secure locations with access by authorized staff only. Logs shall be kept of instances of access, to and use of recorded material.
- g. Security Services will keep a record of all camera locations, a list of trained personnel, the number of access and disclosure requests for video images and where relevant, statistics relating to criminal behavior at the Institute.

### **3.7 Annual Audit**

- a. The Manager, Safety and Security Operations will conduct an annual audit and inspection to ensure that responsible and proper camera monitoring practices are being followed and that each camera is still reasonably necessary to accomplish the purpose for which it was installed.



#### 4. Administration:

The Vice-President, Finance and Campus Services in conjunction with the Manager, Safety and Security Operations and the Information and Privacy Officer, are responsible for ensuring that this Policy is adhered to.

#### 5. Review:

This policy will be reviewed by Executive Council every five years.

This policy shall remain in effect until amended or revoked regardless of the five-year review.

#### 6. References:

##### **Legislation and Government Documents:**

- *The Freedom of Information and Protection of Privacy Act and Regulations*
- Manitoba Ombudsman – Video Surveillance Guidelines
- Office of the Privacy Commissioner of Canada – Guidelines for the Use of Video Surveillance of Public Places

##### **MITT Policies:**

- Ethical Conduct for research Involving Human Subject
- Privacy and Access to Information Policy

#### 7. Definitions:

**VSS** refers to a video surveillance system. A VSS is primarily made up of a camera and an in-house monitoring station. Recording capacity is an additional feature and forms part of a video surveillance system.

**Recording** means an audio, video, or photographic record in any form that is recorded, transmitted or stored in any manner or on any medium (including but not limited to cameras, smartphones and portable devices), or by any means, including film, tape, analog, digital, electronic or mechanical means.