

## Audio and Video Collection Systems

Date Approved by Council :February 13, 2018

County Commissioner:



**1. Purpose**

To establish an Audio and Video Collections Policy that complies with the *Freedom of Information and Protection of Privacy Act* ("FOIP") thereby ensuring the consistent use and appropriate measures are followed to manage audio and video collections under the custody and control of the County.

**2. Revision History**

<i>Approval Date</i>	<i>Revision Number</i>	<i>Modification</i>
2018/02/13	1.0	New Document

**3. Persons/Areas Affected**

All Sturgeon County Employees

Public and third parties in proximity of Sturgeon County property or those engaging in dialogue through telecommunication systems.

**4. Policy Statement**

Sturgeon County recognizes the need to balance an individual's right to protection of privacy against the County's duty to protect County property and to promote a safe environment for employees and third parties. The objective of video collection on County property is to deter unlawful behaviour, mitigate loss or damage to County property, or in the event of an incident, assist to investigate and identify individuals responsible for unlawful acts. The objective of an audio collection system is to promote quality assurance, customer service, employee safety and training opportunities.

This policy may apply to interior or exterior areas of all County facilities subject to the completion of a Privacy Impact Assessment ("PIA") by the department(s) responsible for such facilities to install an audio or video collection system and the review of the PIA by the Access and Privacy Coordinator and submission to the Office of the Information and Privacy Commissioner.

This policy does not apply to covert or overt surveillance systems being used as a case-specific investigation tool for law enforcement purposes or in contemplation of litigation.

This policy does not apply to any surveillance or audio/video collection undertaken by any third parties, including circumstances where such surveillance or audio/video collection is undertaken by a Home Owners Association or other third party on lands owned by the County pursuant to a license or other agreement with the County.

## 5. Definitions

*CAO* - the person, or delegate appointed by Council to the position of Chief Administrative Officer under the *Municipal Government Act*.

*Covert Surveillance* - the secretive continuous or periodic observation of person, vehicles, places, or objects to obtain information concerning activities of individuals.

*FOIP* - the *Freedom of Information and Protection of Privacy Act*

*Overt Surveillance* - non-secretive continuous or periodic observation of person, vehicles, places or objects to obtain information concerning the activities of individuals.

*Personal Information* - is defined in section 1(n) of FOIP as recorded information about an identifiable individual. It includes the individual's race, colour, national or ethnic origin; the individual's age or sex; the individual's inheritable characteristics; information about an individual's physical or mental disability; and any other identifiable characteristics listed in that section.

*Privacy Impact Assessment or PIA* - process for determining the need for the collection of personal information in any particular area based on reasonable concerns regarding the safety or security of County property, staff or members of the public as balanced against an individual's right to privacy, as well as the level of protection and security afforded to personal information that is collected, used or disclosed in a new or modified information system. The security of information refers to the technical, physical and procedural measures taken to protect personal information from the time it is collected until the County disposes of it in accordance with this policy.

*Video and Audio Collection Systems* – refers to a mechanical or electronic system or device that enables continuous or periodic audio or video recording, observing or monitoring of personal information about individuals within telecommunication or in open, public spaces or public buildings.

## 6. Responsibilities

**Council** is responsible to:

- Appoint the CAO or designate as custodian of the audio and video collection systems.

**CAO** is responsible to:

- Ensure compliance with this policy.

**Management** is responsible to:

- Budget for the costs of the audio and video collection systems requirements.
- Ensure a Privacy Impact Assessment is conducted on new initiatives and on significant upgrades to existing audio and video collection systems.
- Inform Information Services of proposed changes to authorized audio and video collection systems.

**County's Information Technology Team** is responsible to:

- Recommend and purchase the appropriate audio/video collection system.
- Install, manage, maintain, and secure system.

**County's Access and Privacy Coordinator** is responsible to:

- Ensure compliance with the County's privacy obligations under *FOIP* in relation to the policy.

**County's Information Management Team Lead** is responsible to:

- Ensure the County's Corporate Records Structure is followed.

**Authorized Personnel** are responsible to:

- Attend training relating to this policy, if required.
- Review and comply with this policy in performing their duties and functions related to the operation and maintenance of audio and video collection systems'.

## 7. Procedures

**Public awareness of cameras:**

- a) Section 34(2) of FOIP requires that the public, employees, and affected third parties must be notified that their personal information may be collected through clearly written signs prominently displayed at the perimeter of video collection areas.

- b) The following sign must be displayed within the perimeter of the video collection areas:

**Cameras may be operating in <location of camera> to enhance public security and to deter and/or detect criminal activity. The collection of recorded images is authorized under section 33(c) of the *Freedom of Information and Protection of Privacy Act* (FOIP). If you have any questions about this collection, contact the Sturgeon County Access and Privacy Coordinator at 780-939-4321.**

**Public awareness of audio recordings:**

- c) Section 34 (2) of the FOIP Act requires that the public, employees, and affected third parties must be notified that their personal information may be collected through clearly written or voiced notification at the onset of the interaction.
- d) The following audio notification must be provided at the onset of the dialogue communication:

**This call may be recorded to provide quality assurance, customer service, employee safety and for training purposes. The collection is authorized under section 33(c) of the *Freedom of Information and Protection of Privacy Act* (FOIP). If you have any questions about this collection, contact the Sturgeon County Access and Privacy Coordinator at 780-939-4321.**

**8. Cross Reference**

Records and Information Management (RIM) Bylaw 1105/06  
Corporate Record Structure  
Information Management Destruction Process  
Privacy Impact Assessment (PIA) Template  
Video Collection Procedure  
Audio Collection Procedure