



PROCEDURES

Policy Name	Video Surveillance		
Policy #	603	Category	Health and Safety
Policy Sponsor	Director, Health, Safety and Security	Previous Revision Date	January 7, 2019
Policy Approved by	President & CEO	Revision Date	April 4, 2024
Procedures Approved by	CFO & Vice-President, Administrative Services	Review Date	April 4, 2029

See the related [POLICY](#)

DEFINITIONS

Core Policies

Those policies which Saskatchewan Polytechnic (Sask Polytech) requires employees and students to affirm on an annual basis, including Harassment Prevention and Response #601, Violence Prevention and Response #604, Sexual Violence Prevention and Response #605, Code of Conduct #703 or Student Code of Conduct (Non-Academic) #1211b, and Appropriate Use of Information Technology Resources #801.

Personal Information

Any information of an identifiable individual, including the individual's image or likeness, etc.

Privacy Office

The Privacy Office includes the Sask Polytech Privacy Head and all those to whom authorities and responsibilities have been delegated (e.g., the Privacy Officer).

Reasonable Expectation of Privacy

The individual's expectation that personal information (including their image) disclosed in a given instance will not be disclosed further to third parties. A reasonable expectation of privacy is context and situation specific and relies upon that which society is prepared to accept and is typically gauged through precedent set-in case law.

Surveillance Technology

Any technology, including closed circuit television, that may record images of individuals.

PROCEDURES

1. Roles and Responsibilities

- 1.1 Sask Polytech Health, Safety and Security (HS&S) is responsible for the administration and operation of video surveillance technology and systems.
- 1.2 Audio Visual Services, at the direction of HS&S, is responsible for the installation and maintenance of video surveillance technology. Information about installations and relocations of

video surveillance equipment will be communicated to Facilities Management and Information Technologies.

- 1.3 The Privacy Office is responsible to authorize requests for access to surveillance records by individuals or groups outside of HS&S.
- 1.4 Designated staff or third parties contracted to Sask Polytech (e.g., campus security commissionaires) may receive access from HS&S (or where appropriate, Testing Centre management) to monitor video surveillance in real time, but shall not have access, without express permission, to access surveillance records.
- 1.5 HS&S, in consultation with the Privacy Office, may authorize departments, individuals, or third parties to install, operate, and administer a video surveillance system, for specific purposes, on Sask Polytech campuses or business locations. Where approval has been granted, the installation, operation, and administration of the video surveillance system must conform to this policy and accompanying procedures, unless specific exceptions have been authorized by HS&S, in consultation with the Privacy Office.

2. Video Surveillance Camera Installation/Placement

- 2.1 The quantity of cameras and their placement at various locations may vary due to a number of factors, including:
 - a. Area of concern or interest being surveilled (e.g., what specifically is to be viewed)
 - b. Camera function (e.g., is the need for situational awareness, recognition, or identification)
 - c. Level of risk to individuals and property
 - d. Access and serviceability
- 2.2 Requests from programs or departments for additional cameras should be submitted to Campus Safety and Security by the area Academic Chair or Director.
 - a. Requests will be evaluated based upon the criteria contained within the Camera Installation Assessment Guideline document.
 - b. The Camera Installation Assessment Guideline document is available on the [Campus Safety and Security SharePoint page](#).
- 2.3 A minimum of a single camera will be provided to cover public points of entry/exit and common spaces. Except where approved by HS&S, and the Privacy Office, camera placement shall generally be restricted to public areas. These include, but are not limited to:
 - a. Points of public entrance and exit
 - b. Primary hallways
 - c. Elevators and/or elevator lobbies
 - d. Areas where money is handled
 - e. Dining areas
 - f. Library interiors
 - g. Building exteriors, loading docks and compound spaces
 - h. Daycares (exterior entry and exit only)

- 2.4 Except in extreme and/or exigent circumstances and where specifically approved by HS&S and the Privacy Office, video surveillance shall not occur in areas where individuals have a reasonable expectation of privacy. These locations may include, but are not limited to:
 - a. Residences or living spaces
 - b. Public restrooms
 - c. Gym washroom locker / changing spaces
 - d. Individual offices
- 2.5 Facilities where video surveillance is in use shall post clearly visible signage at all entrances.
- 2.6 Video surveillance technology may be installed temporarily, without public notification, for the purpose of a specific investigation, as deemed necessary by HS&S and the Privacy Office.

3. Retention and Disposal of Video Surveillance Footage

- 3.1 Unless an exception is made as per the provision below, video surveillance records may be kept for a maximum of 30 calendar days.
- 3.2 Retained video surveillance records shall be kept in a secure location under the supervision of HS&S.
- 3.3 After the retention date has elapsed, the video surveillance records shall be permanently and securely deleted by HS&S.
- 3.4 The authority to make exceptions to the retention and disposal schedule of video surveillance records rests with HS&S, in consultation with the Privacy Office. Possible reasons for an exception may include the use of video surveillance records for an ongoing investigation or for making a decision about an identifiable individual.
- 3.5 Video surveillance records used in an investigation or used to make a decision about an identifiable individual shall be kept a minimum of one year after the close of the investigation or decision in order to remain available for use in appeal processes.

4. Accessing Video Surveillance Records

- 4.1 Video surveillance records shall not be accessed for reasons that fall outside of the stated purpose of the video footage in the policy.
- 4.2 Video surveillance records may be reviewed for investigative purposes by HS&S.
- 4.3 Employees or students outside of HS&S, who wish to access video surveillance records for reasons that align with the purposes for video surveillance in this policy, shall make their request known to HS&S staff, who shall consult with the Privacy Office.
- 4.4 Third-party agencies (e.g., law enforcement agencies, etc.) who wish to view video surveillance records for reasons that align with the purposes for video surveillance stated in this policy, shall direct their request to HS&S, who shall consult with Student Services, Human Resources or the Privacy Office, as appropriate.
- 4.5 Individuals may make Freedom of Information requests to access video surveillance records that contain their personal information by applying in writing to the Privacy Office by using the

prescribed form from the Office of the Information and Privacy Commissioner. Requests to access personal information in video surveillance records shall be evaluated according to the *Local Authority Freedom of Information and Protection of Privacy Act*.

4.6 HS&S shall maintain records of the disclosure of video surveillance records for all purposes.

5. Unauthorized Surveillance

5.1 Questions about video surveillance should be directed to HS&S or the Privacy Office.

5.2 Suspicious or unauthorized surveillance activity should be reported to HS&S or the Privacy Office.

6. Consequences of Non-Compliance

Failure to comply with this policy and procedures may result in disciplinary action up to and including termination of employment, contract termination, disciplinary action under policy #1211b Student Code of Conduct (Non-Academic), and/or legal action.