



Procedures

Policy Name	Video Surveillance		
Policy #	603	Category	Health and Safety
Policy Sponsor	Director, Health, Safety and Security	Previous Revision Date	February 4, 2013
Policy Approved by	President & CEO	Revision Date	January 7, 2019
Procedures Approved by	CFO & Vice-President, Administrative Services	Review Date	See Review Date of Policy or As Needed

See the related [POLICY](#)

DEFINITIONS

Core Policies: Those policies which Saskatchewan Polytechnic requires employees to affirm on an annual basis, including # 601 Harassment, # 604 Violence, # 605 Sexual Assault and Sexual Violence, # 703 Code of Conduct, # 801 Appropriate Use of Information Technology.

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

Privacy Office: The Privacy Office includes the 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.

PROCEDRES

Roles and Responsibilities

1. Saskatchewan Polytechnic Health, Safety, and Security is responsible for the administration and operation of video surveillance technology and systems.
2. Audio Visual Services, at the direction of Health, Safety, and Security, 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.

3. The Saskatchewan Polytechnic Privacy Office is responsible to authorize requests for access to surveillance records by individuals or groups outside of Health, Safety, and Security.
4. Designated staff or third-parties contracted to Saskatchewan Polytechnic (e.g., campus security commissionaires) may receive access from Health, Safety, and Security (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.
5. Health, Safety, and Security, in consultation with the Saskatchewan Polytechnic Privacy Office, may authorize departments, individuals, or third-parties to install, operate, and administer a video surveillance system, for specific purposes, on Saskatchewan Polytechnic 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 Health, Safety, and Security, in consultation with the Saskatchewan Polytechnic Privacy Office.

Video Surveillance Camera Placement

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. A minimum of a single camera will be provided to cover public points of entry/exit and common spaces. Except where approved by Health, Safety, and Security, and the Saskatchewan Polytechnic 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
3. Except in extreme and/or exigent circumstances and where specifically approved by Health, Safety, and Security and the Saskatchewan Polytechnic 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. Locker / changing spaces

d. Individual offices

4. All areas under permanent and continuous surveillance shall be clearly marked by public signage.
5. Video surveillance technology may be installed temporarily, without public notification, for the purpose of a specific investigation, as deemed necessary by Health, Safety, and Security, and the Saskatchewan Polytechnic Privacy Office.

Retention and Disposal of Video Surveillance Footage

1. Unless an exception is made as per the provision below, video surveillance records may be kept for a maximum of 30 days.
2. Retained video surveillance records shall be kept in a secure location under the supervision of Health, Safety, and Security.
3. After the retention date has elapsed, the video surveillance records shall be permanently and securely deleted by Health, Safety, and Security.
4. The authority to make exceptions to the retention and disposal schedule of video surveillance records rests with Health, Safety, and Security, in consultation with the Saskatchewan Polytechnic 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.
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.

Accessing Video Surveillance Records

1. Video surveillance records shall not be accessed for reasons that fall outside of the stated purpose of the video footage in the policy.
2. Video surveillance records may be reviewed for investigative purposes by Health, Safety, and Security.
3. Staff, faculty, or students outside of Health, Safety, and Security, 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 Health, Safety, and Security staff, who shall consult with the Privacy Office.
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 Health, Safety, and Security, who shall consult with the Privacy Office.
5. Individuals may make Freedom of Information requests to access video surveillance records that contain their personal information by applying in writing to the Saskatchewan Polytechnic 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*.

6. Health, Safety, and Security shall maintain record of the disclosure of video surveillance records for all purposes.

Unauthorized Surveillance

1. Questions about video surveillance should be directed to Health, Safety, and Security or the Saskatchewan Polytechnic Privacy Office.
2. Suspicious or unauthorized surveillance activity should be reported to Health, Safety, and Security or the Saskatchewan Polytechnic Privacy Office.

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.