

## **POLICY 1.42 – Video Monitoring**

**Policy Category:** General  
**Effective Date:** September 24, 2009  
**Supersedes:** September 24, 2007

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### **PURPOSE**

1.00 The purpose of this Policy is to regulate the use of cameras for video monitoring and recording at The University of Western Ontario.

### **APPLICATION**

2.00 In this Policy video monitoring means the use of cameras for the purpose of monitoring any part of the campus of The University of Western Ontario or off-campus sites owned or controlled by The University of Western Ontario. Cameras shall be deemed to include any device capable of capturing and/or recording images.

### **PRINCIPLES**

- 3.00 Cameras may be used for video monitoring in accordance with this Policy.
- 4.00 Video monitoring may be used for purposes relating to safety of individuals and security of buildings and property. In furtherance of these purposes, video monitoring will be used to:
- a) monitor building perimeter, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, cashier locations, other high risk activity areas;
  - b) monitor Access Control Systems;
  - c) monitor and record restricted access transactions at entrances to buildings and other areas;
  - d) verify security alarms, intrusion alarms, exit door controls, hold-up alarms;
  - e) conduct video patrols of public areas, transit stops, parking lots, public streets (enclosed and unenclosed), shopping areas and vehicle intersections, etc.;
  - f) conduct criminal investigations;
  - g) monitor pedestrian and vehicular traffic activity.
- 5.00 Notwithstanding 4.00, video monitoring for the following purposes is not subject to the provisions of this Policy:
- a) where it is being used as part of the teaching or research responsibilities of a member of the academic staff of the University; or
  - b) where there are reasonable grounds to believe that an employee is engaged in misconduct in the course of his or her employment activities. The Director of Western Special Constable Service (WSCS) shall be consulted prior to the use of video monitoring as part of any investigation.

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- 6.00 Subject to this Policy, video monitoring shall not be installed to monitor employee performance.
- 7.00 Video monitoring under this Policy shall be conducted in accordance with the following principles:
- 7.01 Video monitoring must be conducted in accordance with the laws of Ontario and Canada;
  - 7.02 Video monitoring and recording must be conducted in a professional, ethical and legal manner;
  - 7.03 Staff who monitor cameras must be appropriately trained and supervised in the responsible use of the cameras and recording equipment;
  - 7.04 Staff who monitor cameras must receive a copy of this Policy and the procedures developed under this Policy and provide written acknowledgment that they have read and understood their contents;
  - 7.05 The recording medium must be handled in a manner that provides continuity and security of the recorded information;
  - 7.06 All recorded information shall be retained for a period set out in the procedures approved by the Video Monitoring Committee;
  - 7.07 Camera locations and operation shall be limited to visual access of areas where there is no reasonable expectation of privacy;
  - 7.08 Appropriate signs and notice of video monitoring and recording must be given.

### **RESPONSIBILITIES**

- 8.00 Western Special Constable Service (WSCS) shall be responsible for the application and administration of this policy.
- 9.00 There shall be a Video Monitoring Committee which shall consist of:
- The Director, WSCS
  - Director, Information and Privacy Office or Designate
  - Two members appointed by the Unity Group
  - One member appointed by the Director, Information Technology Services
- 10.00 WSCS shall develop procedures that will govern the approval, installation, operation and management of video monitoring equipment, and for the proper training of University staff using such equipment.
- 11.00 The procedures shall be consistent with the provisions of this Policy, and shall be approved by the Video Monitoring Committee.
- 12.00 The procedures shall be reviewed on an annual basis by the Video Monitoring Committee in order to accommodate developments in the interpretation of the provisions of the data protection legislation, developments in the technology involved in the recording of images, and developments in the use of such technologies, and to ensure that the procedures comply with all applicable laws and University policies, including laws and policies relating to privacy and access to information.

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- 13.00 The Video Monitoring Committee, or an individual designated by the Video Monitoring Committee, shall have the authority to resolve any matters that may arise in the interpretation or application of this Policy.
- 14.00 Any inquiries with respect to Video Monitoring shall be directed to the Director, WSCS.

### **PROCEDURES**

#### **CONFIDENTIALITY**

- 15.00 Video monitored recordings are confidential and should not be viewed by persons unless authorized to do so.
- 16.00 Video cameras shall not be directed through windows of a residential dwelling, including a university residence or any university or non-university location where an individual has a reasonable expectation of privacy.
- 17.00 Copies of recordings may be made for:  
(a) investigative and/or evidentiary purposes;  
(b) backup purposes, provided that the backup copies are capable of being destroyed in accordance with the approved retention requirements.

#### **SECURITY**

- 18.00 Video recordings shall be stored in a secure manner.
- 19.00 No attempt shall be made to alter any part of an original recording.
- 20.00 Authority to use recordings to conduct investigations of possible misconduct or illegal activity is limited to WSCS or persons designated by WSCS.

#### **RETENTION OF RECORDINGS**

- 21.00 Recordings will be retained for such period(s) as recommended by WSCS and approved by the Video Monitoring Committee.

#### **VIDEO MONITORING RESPONSIBILITIES**

- 22.00 WSCS shall identify the individual responsible for each location where a camera is installed. It shall also prescribe the responsibilities of these individuals, as approved by the Video Monitoring Committee. Such responsibilities shall include: maintaining a list of camera locations, identifying persons authorized to monitor video images, training personnel, ensuring proper supervision, maintaining confidentiality of recorded images, and ensuring the placement of proper signage.
- 23.00 All persons who have authority to monitor cameras shall be trained in proper use of video monitoring cameras in accordance with this Policy and procedures approved by the Video Monitoring Committee.

#### **INSTALLATIONS AND AUDITING**

- 24.00 Video camera(s) installation requests are made through the CPTED/Safety Coordinator at WSCS who will assist with best practices, advice on location and responsibilities of the requesting department.

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25.00 WSCS is responsible for initial response to any suspicious activity that is observed or reported.

26.00 WSCS will conduct regular audits to assess compliance with this Policy.

### **PUBLIC NOTICE AND SIGNAGE**

27.00 Signage giving notice of video monitoring of public areas will be posted in a discernible location in reasonable proximity to the location of cameras. Location and wording of signage must be approved by WSCS and the Video Monitoring Committee.

28.00. Notification of video monitoring at the University shall be posted on various university web sites, as recommended by WSCS and approved by the Video Monitoring Committee.

### **REPORTING**

29.00 The annual Western Special Constable Service Report shall include information regarding video monitoring, where relevant, and statistics relating to criminal behaviour on campus.