

# KING TOWNSHIP CORPORATE POLICY VIDEO SURVEILLANCE



**POLICY NO.:**  
COR-POL-157

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Corporate Services Department

Issue Date: 2024-12-09

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Reviewed Date: 2024-12-09

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Issue No.: 1

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Next Review: 2029-12-10

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## 1 Purpose Statement

- 1.1 The purpose of this policy is to support the use of security cameras (also known as CCTV or closed circuit television) in public locations to provide a safe and secure environment for customers, staff, and property while protecting the individual's right to privacy.

## 2 Policy Objective

- 2.1 The Township recognizes the use of security cameras at municipally owned facilities as part of an overall strategy to ensure the safety and security of persons and property.

## 3 Application/Scope

- 3.1 This policy and accompanying procedures adhere to privacy requirements set out in the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*. In addition, the policy has been developed to follow the guidelines set out by the Information and Privacy Commission of Ontario (IPC).
- 3.2 This policy applies to all video surveillance systems located in all Township properties and facilities, including facilities operated by King Township Public Library Board and to members of its staff.

## 4 Definitions

- 4.1 **Personal Information (PI)** carries the same definition as outlined in [section 2\(1\)](#) the *Municipal Freedom of Information and Protection of Privacy Act*.

## 5 Video Surveillance System

- 5.1 Video surveillance systems are a resource used by the Township to promote the safety of customers, staff, and community members. These systems also help protect municipal property against theft or vandalism and can assist in the identification of intruders and of persons breaking the law.
- 5.2 In the event of a reported or observed incident, a review of video footage may be used to assist in the investigation of an incident. The Township will maintain control of and responsibility for the video surveillance system.
- 5.3 Employees and service providers are expected to review and comply with

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this Policy, the *MFIPPA*, the *Municipal Act, 2001*, and other relevant statutes in performing any duties and functions that are related to the operation of the video surveillance program.

## **6 Collection of Personal Information Using Video Surveillance**

- 6.1 Personal information is collected as permitted in accordance with [section 28\(2\)](#) of *MFIPPA*.
- 6.2 The information collected is used only for the purpose of protecting public security and safety, preventing illegal activity, and as potential evidence of a reported incident.

## **7 Notice of Collection of Video Surveillance**

- 7.1 The Township shall provide notice in the form of visible signs to members of the public at entrances and/or prominently displayed on the grounds under video camera coverage of its collection.
  - 7.1.1 On at least one sign at each location with video camera coverage the following information will include, in accordance with [section 29\(2\)](#) of *MFIPPA*:
    - a) The legal authority for the collection of personal information.
    - b) The principal purpose(s) for which the personal information is intended to be used; and
    - c) The title, business address and business telephone number of an officer or employee of the institution who can answer the individual's questions about the collection.

## **8 Video Surveillance Monitoring and Records**

- 8.1 Persons identified in section 9 of this policy may review recorded information from the system, but only in accordance with this Policy.
- 8.2 Video surveillance monitors shall not be placed in a position that enables public viewing.
- 8.3 Video surveillance is not used to monitor customers' general use of the

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municipal facilities, areas of expected privacy, or employee performance. Video reviews are limited to incidents that are part of an investigation of a potential offence to identify an individual associated or possibly involved.

8.4 Video that has not been requested by the public, Township employees or law enforcement agencies within the maximum retention period is considered transitory and is automatically erased by being overwritten (30 day retention).

8.5 Personal information used for law enforcement purposes must be retained for one (1) year to comply with [section 5](#) of Ontario Regulation 823 under *MFIPPA*.

## 9 Review of Information

9.1 The following designated staff have the authority to review recorded video coverage and authorize the release of information for investigations.

- Chief Administrative Officer
- Clerk/Privacy Officer
- Manager, Facility Operations
- Manager, Information Technology
- Supervisor, Facility Maintenance

## 10 Authorized Usage or Viewing

10.1 Staff at each location may be authorized to monitor real-time camera feeds as is reasonably necessary to ensure the safety and security of persons and property. Every reasonable attempt will be made to ensure security camera monitors are not in a position that enable the public and/or unauthorized staff to view them.

## 11 Requests For Disclosure

11.1 The Township shall not disclose any video record to any individual or organization except as permitted through *MFIPPA*.

11.2 **Public requests for disclosure** - Any person may make a written request for access to video records created through a video surveillance system pursuant to *MFIPPA* and the Township's process.

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11.2.1 Access may depend on whether there is a justified invasion of another individual's privacy and whether any exempt information can be reasonably severed from the record.

11.3 **Internal requests for disclosure** – Township employees or consultants may request a copy of a video recording if it is necessary for the performance of their duties in the discharge of the Township's functions.

11.4 **Law enforcement requests** - The Township may disclose a copy of a video recording to a law enforcement agency where there are reasonable grounds to believe that an unlawful activity has occurred and has been captured by the video surveillance system in accordance with [section 32. \(g\)](#) of *MFIPPA*.

11.4.1 If law enforcement access to video surveillance is required, the requesting Officer must complete the Law Enforcement Request for Personal Information Form and submit to the Clerk's Office. The request will be processed in accordance with the *Release of Personal Information to Law Enforcement Request Procedure* (CLK-PRO-140).

## 12 Unauthorized Access or Disclosure – Privacy Breach

12.1 Any employee who becomes aware of an unauthorized disclosure of a video record in contravention of this policy, and/or potential privacy breach must follow the Township's [Privacy Breach Administrative Policy ADM-POL-160](#).

## 13 Related Documentation

- 13.1 *Privacy Breach Administrative Policy* – ADM-POL-160
- 13.2 [Municipal Freedom of Information and Protection of Privacy Act](#)
- 13.3 [Municipal Act, 2001](#)
- 13.4 [Guidelines for the Use of Video Surveillance Information and Privacy Commissioner of Ontario](#)
- 13.5 *Law Enforcement Request for Personal Information Form*
- 13.6 *Release of Personal Information to Law Enforcement Procedure* (CLK-PRO-140)
- 13.7 Appendix A - Signage Example

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14	Approval Authority			
	<u>Council</u>	<u>2024-105</u>	<u>Denny Timm</u>	<u>2024-12-09</u>
	Authority	By-law	Township Clerk	Date

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**Appendix A – Signage Example**

**To promote safety this area  
is under video surveillance**



**Images may be recorded and/or monitored**

Personal information is collected using video cameras as authorized under the *Municipal Act* and in accordance with the *Municipal Freedom of Information and Protection and Privacy Act*. This information is used for the purposes of protecting public security and safety and preventing illegal activity.

If you have any questions about this collection, please contact the Township Clerk of the Township of King, 2585 King Road, L7B 1A1 at 905-833-5321.

[www.king.ca/videosurveillance](http://www.king.ca/videosurveillance)



*Keeping Our Community Safe*