

STANDARD OPERATING PROCEDURE (SOP)

DOCUMENT ID: SOP-161 VERSION #2	TITLE: SAFETY AND SECURITY CAMERA SYSTEMS	SEARCH KEY:
PURPOSE:	<ul style="list-style-type: none"> To outline the procedure for the use of safety and security camera systems, and management of safety and security camera data. 	POST TO: Public Website <input checked="" type="checkbox"/> DC Connect <input checked="" type="checkbox"/>
SCOPE (Applies To):	<ul style="list-style-type: none"> ALL COLLEGE EMPLOYEES DOUGLAS STUDENTS' UNION INDEPENDENT CONTRACTORS 	
STATUS: FINAL	AUTHOR: NANCY CONSTABLE, DIRECTOR, SAFETY, SECURITY & RISK MANAGEMENT CONTACT INFORMATION: 604-527-5828	CREATED: 2018/06/05 (yyyy/mm/dd)
	RESPONSIBLE OWNER: SAFETY, SECURITY & RISK MANAGEMENT	
PROCESS REVISIONS:	REVISION AUTHOR: CHRIS UDY, MANAGER, CAMPUS SECURITY OPERATIONS CONTACT INFORMATION: 604-777-6692	REVISED: 2019/05/02 (yyyy/mm/dd)
RELEVANT FORMS:	N/A	REVISED: (yyyy/mm/dd)
ACCORD/POLICY APPROVAL BODY:	<ol style="list-style-type: none"> S. BEASLEY, EXECUTIVE DIRECTOR, DOUGLAS STUDENTS' UNION R. COUSINEAU, CHAIR, BCGEU C. GARDNER, DIRECTOR, FACILITIES & ANCILLARY SERVICES A. HODGSON, MANAGER, FACILITIES SERVICES D. JACKSON, MANAGER, FACILITIES SERVICES V. LOCKYER, EXECUTIVE DIRECTOR, THE TRAINING GROUP R. MAURER, AVP, HUMAN RESOURCES T. ROSSEEL, DIRECTOR, LEARNING RESOURCES E. ROZMAN, PRESIDENT, DCFA T. SZIRTH, VP, ADMINISTRATIVE SERVICES & CFO/POLICY OFFICER CAMPUS SITE SECURITY MANAGER 	DATE APPROVED: 2018/06/05 (yyyy/mm/dd)
QUALITY ASSURANCE FORMAT APPROVAL: <input checked="" type="checkbox"/> ADMINISTRATORS' COMMUNITY OF PRACTICE (ACP) SOP SUBCOMMITTEE <input checked="" type="checkbox"/> THOR BORGFORD, VICE-PRESIDENT, ACADEMIC AND PROVOST		DATE APPROVED: 2018/06/25 (yyyy/mm/dd)
RELEVANT POLICY:	Douglas College Administration Policies <ul style="list-style-type: none"> Safety and Security Camera Systems 	
RELEVANT ACRONYMS & DEFINITIONS:	BC FIPPA: BC Freedom of Information and Protection of Privacy Act Bookmark: To save Safety and Security Camera data Covert Cameras: Camera Systems that are used without notification to the public or the persons being viewed.	

<p>RELEVANT ACRONYMS & DEFINITIONS: (cont.)</p>	<p>DC: Douglas College</p> <p>Director, SSRM: Director, Safety, Security & Risk Management or their designate.</p> <p>Incident Report: A report prepared by Campus Security for the Director, SSRM which describes a safety or security incident affecting the College Community, as reported to/discovered by Campus Security, with relevant details including any Safety and Security Camera Data accessed and bookmarked (saved) pertaining to the incident.</p> <p>Privacy-Intrusive Camera Systems: Camera Systems located in areas where there is a reasonable expectation of privacy (e.g. private work areas, classrooms or offices), and Covert Cameras in all locations.</p> <p>Safety and Security Camera Coordinators: Director, Facilities and Ancillary Services; Manager, Facilities Services; Executive Director, The Training Group; Executive Director, Douglas Students' Union.</p> <p>Safety & Security Camera Operator: Authorized SSRM personnel that operate Safety and Security Camera Systems; Manager, Facilities Services; Director, SSRM; and contractors authorized to conduct installations and repairs to Safety & Security Camera Systems.</p> <p>Safety & Security Camera System: Any camera installation used exclusively for safety, security and law enforcement purposes, relating to the protection of students, employees, and the public, or the deterrence or detection of criminal activity, including theft, vandalism, or other property damage.</p> <p>SSRM: Safety, Security and Risk Management.</p>
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PREAMBLE:

Camera technology is used by Douglas College to enhance the safety and security of those who work, learn and visit our campuses, and to protect the College’s assets and property. The College is committed to using this technology in a way that respects and safeguards the privacy of members of the **College community**.

1. APPROVAL OF SAFETY AND SECURITY CAMERA SYSTEMS

STEPS:

- i. Safety and Security Camera Systems may not be installed or expanded without the written approval of the **Director, Safety, Security and Risk Management**.
- ii. In addition to the requirement to secure approval under this procedure, Privacy-Intrusive Camera Systems must also be approved in writing by the **Associate Vice President, Human Resources**, in consultation with the **Vice President Administrative Services and CFO**.

1. APPROVAL OF SAFETY AND SECURITY CAMERA SYSTEMS (cont.)

STEPS:

- iii. Privacy-Intrusive Camera Systems must be discontinued at the earliest available opportunity. They will only be approved for a maximum period of 3 months, after which the **Responsible Administrator** may seek an extension under the approval process set out in these procedures.
- iv. Privacy-Intrusive Camera Systems will not be utilized in washrooms or change rooms.

2. ACCESS TO SAFETY & SECURITY CAMERA SYSTEMS AND SAFETY & SECURITY CAMERA DATA

STEPS:

- i. Camera Operators must keep record logs of all access, use, and destruction of recorded Camera Data. When it is no longer required, recorded Safety & Security Camera Data must be securely overwritten or destroyed. **Security Officers** will:
 - a. Access and bookmark Safety & Security Camera Data as it relates to a safety or security incident;
 - b. Prepare and submit an Incident Report and note the Incident Report number in the bookmarked data filename;

The **Director, Safety, Security and Risk Management (SSRM)** will:

- a. Maintain a log of bookmarked Safety & Security Camera Data, including the date saved, related Incident Report number, related investigation file name, and date destroyed.

3. RETENTION OF RECORDED SAFETY & SECURITY CAMERA DATA

STEPS:

- i. Recorded Safety & Security Camera Data will be retained for approximately 30 days except:
 - a. If it is needed to facilitate or document an investigation or legal proceeding, it may be retained for as long as required for that purpose; and
 - b. If it has been used to make a decision that directly affects an individual, it must be retained for at least one year after the date of that decision.

4. REQUESTS FOR RECORDED SAFETY & SECURITY CAMERA DATA

STEPS:

- i. Requests for access to or disclosure of recorded Safety & Security Camera Data from **College employees** acting in the course of their duties will be referred to the **Director, SSRM**, who may disclose the requested information on a “need-to-know” basis and only if consistent with the Safety and Security Camera Policy.

4. REQUESTS FOR RECORDED SAFETY & SECURITY CAMERA DATA (cont.)

STEPS:

- ii. Requests for recorded Safety & Security Camera Data from law enforcement agencies in Canada will be referred to the **Director, SSRM**, who may disclose the requested information in circumstances permitted by **the BC Freedom of Information and Protection of Privacy Act (BC FIPPA)** including where:
 - a. The requester has expressed legal authorization to receive the information;
 - b. The request is made to assist in a specific investigation undertaken with a view to a law enforcement proceeding, or from which a law enforcement proceeding is likely to result.
 - c. All other requests for recorded Safety & Security Camera Data will be processed by the **College Administrator** responsible for managing information requests under the terms of the **BC FIPPA**.

5. AUDITING AND OVERSIGHT OF CAMERA SYSTEMS

STEPS:

- i. The **Director, SSRM** will ensure that periodic audits of Safety & Security Camera Systems, including monitors and storage systems, are conducted to determine whether:
 - a. Any changes need to be made in the use or configuration of the systems;
 - b. The systems and their terms of use have received the required approval;
 - c. The systems are being used in accordance with the approved terms of use;
 - d. The systems have proven effective in addressing the problem they were intended to address;
 - e. The problems that justified the systems' use in the first place remain a concern; or
 - f. There is any reason that justifies their termination.
- ii. The **Director, SSRM** will promptly and effectively address any concerns that are raised by audits conducted under these procedures.

6. ADMINISTRATIVE RESPONSIBILITIES

STEPS:

- i. **Safety and Security Camera Coordinators**, in consultation with the **Director, SSRM**, shall perform a coordinating role on their respective campuses by:
 - a. Coordinating the approval of the terms of use for new or expanded Safety and Security Camera Systems in accordance with the Safety and Security Camera Policy;
 - b. Overseeing the installation or expansion of Safety and Security Camera Systems;
 - c. Maintaining their Safety and Security Camera Systems to ensure they are working properly;
 - d. Providing guidance on compliance with the Safety and Security Camera Policy;
 - e. Promoting awareness by the College community on the appropriate use of Camera Systems;

6. **ADMINISTRATIVE RESPONSIBILITIES** (cont.)

STEPS:

- f. Cooperating in audits of Safety and Security Camera Systems conducted under the DC Safety and Security Camera Policy; and
 - g. Assisting, where appropriate, in the investigation of breaches and potential breaches of the Safety and Security Camera Policy.

- ii. The **Director, SSRM** is responsible for the planning and budgeting of Safety and Security Camera Systems for Douglas College campuses;

- iii. Where renovation or new construction is involved, the **Director, Facilities and Ancillary Services**, in consultation with the **Director, SSRM**, will account for Safety and Security Camera Systems within the renovation or new construction budget and planning.

- iv. The **Director, SSRM** is responsible for public notification of the Safety and Security Camera Systems as described in the Safety and Security Camera Policy.