
 DALHOUSIE UNIVERSITY <i>Inspiring Minds</i>		<i>Instruction Number:</i>
	<i>Subject:</i> Surveillance & Recording	<i>Date Issued:</i> August 4, 2011
	<i>Title:</i> Video/Image/Data Recording and Surveillance Policy	<i>Date Effective:</i> August 4, 2011
	<i>Issued by:</i>	<i>Approved by:</i> Ken Burt, Vice-President, Finance & Administration 

A. Purpose

The purpose of this policy is to regulate the use of Surveillance Equipment, including closed circuit television cameras and other video monitoring and recording equipment systems used to monitor and record public and restricted areas of Dalhousie University property, for the purposes of enhancing the health, safety and security of students, faculty, and staff and the protection of physical property of the University.

B. Application

This Policy applies to the use of Surveillance Equipment to monitor and record public and restricted areas.

C. Definitions

In this Policy:

“Director” means the Director of Security Services.

“Operations Manager” means the Operations Manager of Security Services.

“Surveillance Equipment” means any closed circuit television cameras and any other video/image monitoring and recording equipment systems used to monitor and record public and restricted areas on Dalhousie property. This also includes any system to monitor and record an individual's identifying information when accessing public and restricted areas on Dalhousie property.

D. Policy

1. Subject to this Policy, Dalhousie's Security Services has sole authority to oversee and coordinate the use of all Surveillance Equipment on Dalhousie property.

2. Video/image monitoring and recording under this Policy will be designed and operated in a manner that minimizes privacy intrusion and that is absolutely necessary to achieve its lawful goals.
3. Information obtained through video/image monitoring or recording will be used for University security, health and safety and law enforcement purposes only. For greater certainty, video/image monitoring and recording will not be used for employee performance purposes, except as specifically authorized pursuant to sections 11-15, below.
4. All information obtained through video/image monitoring and recording is confidential and will only be released when authorized by the Director or the Operations Manager.
5. All persons involved in the use of Surveillance Equipment at Dalhousie will be appropriately trained and supervised in the responsible use of this technology.
6. All existing uses of video/image monitoring and recording will be brought into compliance with this Policy within twelve months of the approval of this Policy.

E. Procedures

Installation of Surveillance Equipment

7. The authorization for the installation of Surveillance Equipment lies with the Director. No one is authorized to install, or arrange to be installed, any Surveillance Equipment unless such installation has been approved in advance by the Director.

Public Awareness of Surveillance Equipment

8. In locations where Surveillance Equipment is in use, signs must be posted in an appropriate area, either at the entrance to the area under surveillance or in close proximity to the camera.
9. If the Surveillance Equipment is recording, the following sign will be displayed:

*This area is being **RECORDED** by closed circuit television.*

If the Surveillance Equipment is not recording but being monitored on a screen, the following sign will be displayed:

*This area is being **MONITORED** by closed circuit television.*

10. Each sign will include contact information for the Director to inquire about the surveillance or recording and to request access to their image. The following wording should appear on the bottom of the sign:

Further information may be obtained from the Director of Security Services at [the appropriate phone number].

Covert Surveillance

11. Covert surveillance (hidden cameras without signage) will be used only in exceptional cases and only with the approval of the Vice President, Finance & Administration.
12. Where it appears that covert surveillance may be required, the Director will first conduct an assessment of the specific circumstances of the situation and make a recommendation to the Vice President, Finance & Administration.
13. The Director's assessment must demonstrate that covert surveillance is the only available option in the circumstances, that the benefits derived from the information obtained would far outweigh the violation of privacy of the individuals observed and that covert surveillance is not otherwise in violation of the law.
14. Surveillance Equipment will be positioned in a way that minimizes unnecessary surveillance (e.g. in the case of an ongoing computer theft problem, the camera will be positioned so that individuals will be recorded only if they approach the equipment of concern).
15. In all cases, covert surveillance will be time-limited.

Requests to view recordings

16. Only trained individuals working at the Office of Security Services are permitted to operate Surveillance Equipment and access live or recorded material. However, in exceptional circumstances, the Director may designate other specific individuals at Dalhousie to operate Surveillance Equipment and access live or recorded material.
17. Notwithstanding section 17, all requests by University Administrators or law enforcement agencies to view recorded information must be made to and are subject to the approval of the Director or the Operations Manager. Where permission is granted to view recorded material, that material must be viewed in the presence of a trained individual working at the Office of Security Services .
18. All other requests to view recorded information must be made as a Freedom of Information and Protection of Privacy application to the University's Freedom of Information Protection of Privacy Coordinator.

Safeguards

19. All recordings produced by Surveillance Equipment will be kept in a secure manner or locked facility and managed appropriately by Security Services to protect legal obligations and evidentiary value.
20. If a copy of a recording must be made for evidentiary purposes, it must be copied onto a permanent storage medium (such as a CD or DVD) and physically labeled with the date, time and location of the surveillance. No other copies of

surveillance recordings, other than those needed for back-ups or evidentiary purposes may be made.

21. Recordings from the surveillance cameras will be kept for a maximum of 90 days unless otherwise required for the purposes outlined in this Policy. Recordings will be erased or otherwise destroyed at that point unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Director.

Accountability

22. A log will be kept by Security Services with regard to the use of Surveillance Equipment. The log will reflect all instances where:
 - (a) a member of Security Services or person designated under section 17 views a recording,
 - (b) a request is made to view a recording,
 - (c) the Director denies a request to view a recording and the reasons for the denial,
 - (d) the Director permits an individual to view a recording (this will include the reasons the request was granted, who viewed the recording, when, and who from Security Services was present during the viewing), and
 - (e) the Director releases a recording to a law enforcement agency.
23. The Director will provide an annual report to Vice-President, Finance and Administration, regarding this policy. This report will include:
 - (a) all requests to install new Surveillance Equipment,
 - (b) all new Surveillance Equipment installations,
 - (c) the removal of Surveillance Equipment,
 - (d) all information collected under section 23 of this Policy,
 - (e) recommendations for revisions to this Policy, if necessary,
 - (f) any other information which may be relevant to the operation of this Policy.
24. This Policy will be reviewed and updated at least every two years by the Director.