



POLICY TITLE: Workplace Video Surveillance Policy	POLICY NO: 2025-01
AUTHORITY: Council for the Corporation of the City of Greenwood	CLASSIFICATION: Human Resources
EFFECTIVE DATE: January 10 th 2025	MOTION: (28-25)
SUPERSEDES:	

1. Purpose

The purpose of this Policy is to make employees aware of the City of Greenwood’s use of why, how and where surveillance technology is used, the personal information that is collected, and how the City of Greenwood safeguards the confidentiality of the personal information collected from such use.

The City of Greenwood recognizes that closed circuit television and other surveillance equipment can help keep the work facility safe and secure, but it can also violate the personal privacy of individuals who are monitored. This Policy has been prepared to establish clear ground rules for surveillance and the collection, use and disclosure of footage, images, records and other personal information obtained from it, in order to secure a proper balance between safety/security and Employees’ privacy rights.

2. Scope

This Policy applies to all City of Greenwood Employees as defined below.

3. General

The City of Greenwood reserves the right to install surveillance cameras and equipment in the workplace for purposes of providing a safe, secure and healthy environment for employees, vendors and visitors. At the same time, the City of Greenwood acknowledges that the collection, use and disclosure of an individual’s images and other personal information via surveillance technology is potentially privacy invasive. Accordingly, the City of Greenwood will respect individuals’ privacy rights and implement safeguards outlined in the Policy to ensure that its operation of surveillance equipment is as minimally invasive as possible. The City of Greenwood will also limit its use and disclosure of the video, images and other personal information it collects via surveillance to security, safety, health, insurance and law enforcement purposes only. The City of Greenwood will not seek out information regarding Employee conduct or misconduct through video surveillance; however, any inadvertent discovery or discovery related to an investigation will be addressed as per Policy HUM – City of Greenwood.

4. Definitions

“Administration” means the Corporate Services Department, which is responsible for ensuring that the policies, programs and other directions of Council are implemented.

“Chief Administrative Officer” means the individual appointed by Council to the position of Chief

Administrative Officer (or his/her designate) as the head of Administration.

“City” means the City of Greenwood.

“Corporate Officer” means the Employee charged with ensuring the records of the City are collected, used, retained and disposed of in compliance with regulatory and legislative requirements, such as the Freedom of Information and Protection of Privacy Act.

“Employee(s)” means person(s) working for the City in an employment relationship regardless of whether they are employed on a full-time, part-time, seasonal, auxiliary, contract, temporary, or permanent basis, including volunteers and students.

“Footage” means video or sound recording, images, records and other personal information collected by surveillance equipment.

“Policy” means general statements or guidelines that are high-level in nature, as opposed to being operationally oriented, which direct a plan, course of action or decision, according to a standard or performance outcome.

“Private Area” means a location in which there is a reasonable expectation that a user's behavior may not be openly observed, including but not limited to locker and changing rooms, bathrooms and private office spaces.

“Public Area” means a location where a reasonable expectation of privacy is not violated by recording acts that may normally be openly observed, including but not limited to building entrances, walkways, parking lots, lunch and break rooms, shop floors, and other common areas.

“Surveillance Equipment” means closed circuit television (CCTV) cameras and any other system, camera, technology device, communications device or process, used along or in conjunction with a network, for purposes of gathering, monitoring, recording, or storing images of the City of Greenwood facilities and the people present at such facilities. Images captured by video surveillance technology may be real-time or preserved for review at a later date.

5. Responsibilities

A. Administration will:

- a. Coordinate the development of awareness, training, and communication programs in support of this Policy to ensure all Employees are informed of the requirements of this Policy;
- b. Ensure that legal and other operational risks to the City from utilizing Surveillance Equipment are identified and managed; and,
- c. Provide timely advice to managers respecting the application of this Policy including guidance on an appropriate employer response to transgressions of the Policy.

B. Managers and Supervisors will:

- a. Deal with breaches of this Policy in a timely manner, taking the appropriate action based upon the facts and circumstances; and
- b. Delegate authority and responsibility, where applicable, to apply this Policy within their area of responsibility.

C. Employees will:

- a. Check with their manager or supervisor when they are uncertain about any aspect of this Policy.

6. Guidelines for Use

Employees must comply with the guidelines set forth in this Section when using Surveillance Equipment:

3.1 Approval Required

No person may install or arrange for the installation of surveillance equipment on City of Greenwood property without the advanced approval of the Chief Administrative Officer or their designate.

3.2 Where Surveillance Equipment May Be Installed

Surveillance equipment may be installed in Public Areas. Installation of Surveillance Equipment in Private Areas will not be permitted except where the Chief Administrative Officer or their designate provides approval in advance after determining that the installation is necessary to protect security, safety or health or for purposes of law enforcement. Installation of Surveillance Equipment does not necessarily mean that the equipment will be used and the area monitored 24/7/365.

7. Overt & Covert Surveillance

In most cases, use of surveillance equipment will be overt so that individuals know they are being monitored. Accordingly, signs will be prominently posted inside or at the entrance of any area in which surveillance equipment is installed indicating that the area is being monitored. Covert, or secret surveillance will be used only in exceptional cases where Chief Administrative Officer or their designate and the Corporate Officer provides approval in advance after determining that:

- The covert use is allowed by law;
- The covert use is not only necessary but also the only way to accomplish the security, safety, health or law enforcement objective;
- The benefits that the personal information the covert use collects significantly outweighs the resulting privacy harms to the persons affected by the covert use; and
- The covert use is limited in duration and carried out in the least privacy invasive manner possible that still enables the essential information to be collected.

8. How Surveillance Will Be Conducted

Where Surveillance Equipment is used, it will be operated only by properly authorized personnel in a manner that is legal, ethical, professional and consistent with all relevant regulatory and legislative regimes and City of Greenwood policies and codes of conduct, including but not limited to policies governing sexual harassment, personal privacy and respectful workplaces. Monitoring individuals based on their race, gender, sexual orientation, national origin, disability or other characteristic that human rights laws protect from discrimination is strictly prohibited.

9. Access To Footage

The City of Greenwood will limit access of footage to authorized personnel. In addition, the Chief Administrative Officer or their designate may approve written access requests from other City or law enforcement personnel for very limited purposes. Where such requests are granted, the footage must be viewed in the presence of a trained City of Greenwood staff member to ensure that its integrity is maintained. The Corporate Officer will maintain a written access log tracking all instances of access to, or use of, footage listing:

- The date and time of access;
- The person granted access; and
- A summary of the reason access was necessary.

10. Use Of Footage

The City of Greenwood will use footage obtained from surveillance equipment exclusively for security, safety, health and law enforcement purposes. Footage will not be used to evaluate employee job performance. Nor will surveillance equipment be used to collect data about behaviour of groups of individuals using an area over a period of time, such as parking patterns or times individuals spend in break rooms.

11. Disclosure Of Footage

The City of Greenwood will not show or provide footage obtained from surveillance equipment to anyone other than authorized personnel, subject to the following exceptions for:

- Law enforcement agencies for purposes of an investigation;
- Use at a formal City of Greenwood disciplinary proceeding;
- Assisting in the identification of individuals relating to a criminal incident; and
- Other circumstances or uses approved by the Department or the Corporate Officer, or as required by law.

Where made, disclosure of footage to third parties will be limited to the amount or extent necessary to accomplish the purpose(s) for which the system was installed, and limited to:

- Police and other law enforcement agencies, where the footage could assist in a specific criminal enquiry and/or the prevention of terrorism and disorder;
- Prosecution agencies;
- Relevant legal representatives;
- People whose images have been recorded and retained, unless an exemption applies;
- Assisting in the identification of a victim, witness or perpetrator involved in a criminal incident; and
- Members of staff involved in the City of Greenwood disciplinary processes.

12. Safeguarding Of Footage

The City will keep all footage from surveillance equipment in a secure manner or locked facility in accordance with the City of Greenwood policy. No copies of footage will be made except where necessary for backup or evidentiary purposes, in which case the footage must be copied onto a CD, DVD or other permanent storage medium and physically labeled with a date, time and location of the surveillance. Footage must be kept for a maximum of 30 to 90 days unless otherwise required for the purposes outlined

in the Policy. Footage must be erased or otherwise destroyed at that point unless it must be retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Corporate Officer.

13. Policy Violations

Any collection, use or disclosure of footage for purposes other than those listed in this Policy are strictly prohibited. Policy violations of policy will result in appropriate disciplinary action in accordance with The City of Greenwood Human Resource policies and disciplinary procedures.

RELATED POLICIES, PROCEDURES, AGREEMENTS AND/OR BYLAWS:

HUM - City of Greenwood

Personal and Confidential Information Policy – City of Greenwood

Freedom of Information and Protection of Privacy Act

Collective Agreement between City of Greenwood and CUPE Local 2254