

# The Corporation of the Township of Whitewater Region

## By-law Number 19-10-1213

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### **A by-law to establish a Corporate Video Policy**

**Whereas**, section 28(2) of the *Municipal Freedom of Information and Protection of Privacy Act* allows the Township to pass by-laws regarding the collection of personal information through video surveillance; and

**Whereas**, the Council of the Township of Whitewater Region deems it expedient and necessary to provide a formal policy for Corporate Video;

**Now therefore Council of the Corporation of the Township of Whitewater Region enacts as follows:**

1. That the Corporate Video Policy is hereby established.
2. That the Corporate Video Policy attached shall form a part of this by-law.
3. This by-law shall come into force and take effect upon the date of the final passing thereof.

**Read a first, second and third time and finally passed this 2nd day of October, 2019.**

  
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**Michael Moore, Mayor**

  
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**Carmen Miller, Clerk**



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**Policy:** Corporate Video Policy

**Main Contact:** Clerk

**Last Revision:** New

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[Policy Statement](#)

[Purpose](#)

[Definitions](#)

[Policy Requirements](#)

[Monitoring](#)

[Authority](#)

[Contact](#)

[Change History](#)

## Policy Statement

The Corporation of the Township of Whitewater Region has video systems to enhance the safety and security of employees, the public and corporate assets, to prevent unauthorized activities on or involving Township Property, and to reduce risk and liability exposures.

## Purpose

The Township of Whitewater Region recognizes the delicate balance between an individual's right to be free from invasion of privacy and the need to protect the safety and security of its employees, the public and property.

Where warranted the Township may use corporate video systems in Township owned or operated buildings and open spaces to deter and detect both anti-social behavior and crime such as theft, vandalism and unauthorized entry.

## Definitions

In this policy, the following terms have the meanings set out below:

**"Clerk"** means the Clerk of the Corporation of the Township of Whitewater Region.

**"Retention period"** is the period of time during which a specific records series must be kept before records in that records series may be disposed of.

“**Township**” means the Corporation of the Township of Whitewater Region

“**Video system**” means a video, physical or other mechanical, electronic, digital or wireless system or device that enables continuous or periodic video recording, observing or monitoring of individuals in public spaces or within Township operated facilities.

## Policy Requirements

### 1.0 Providing Notice

Signs are posted at all public access points to and within areas where corporate video is in use. All attempts are made to ensure proper signage is posted at all facilities using a video surveillance system.

### 2.0 Camera Placement

- 2.1 Where possible, all cameras that are adjustable or moveable are restricted to prohibit the viewing of locations not intended to be monitored. Cameras are prevented from looking through a window of an adjacent building or areas where a higher level of privacy is expected, such as within a washroom or change room.
- 2.2 Only the Township staff in coordination with the Clerk or delegated employees, may install or change the installation of a camera's permanent setting.
- 2.3 The installation of any new cameras must be approved by the Chief Administrative Officer in writing.
- 2.4 Schedule “A” sets out the placement of the cameras installed at the Township's sites.

### 3.0 Use of Video Recordings

- 3.1 The information collected through video surveillance is used only for the following purposes:
  - Enhancing the safety and security of employees, the public and corporate assets;
  - Preventing unauthorized activities upon or involving Township property;
  - Assisting in investigating unlawful activity;
  - Assessing the effectiveness of safety and security measures;
  - Investigating an incident involving safety or security (people, facilities or assets);
  - Providing evidence as required to protect the Township's legal rights;
  - Investigating an incident or allegation of serious employee misconduct;
  - Managing corporate risk;
  - Investigating an incident involving a potential or active insurable claim; or
  - An operational requirement, such as arena plan room monitoring.
- 3.2 Any time an incident report is completed, applicable video will be pulled and retained as needed.

## 4.0 Requests for disclosure

4.1 The Township of Whitewater Region does not disclose a video record to any individual or organization except as permitted through MFIPPA.

- Public requests for disclosure – Any person may make a written request for access to video records created through a corporate video system through the freedom of information process. Access may depend on whether there is an unjustified invasion of another individual's privacy and whether any exempt information can be reasonably severed from the record.
- 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 institution's functions.
- 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 been captured by the video surveillance system in accordance with section 32(g) of MFIPPA.

4.2 If video containing personal information is improperly disclosed or is suspected to have been disclosed to an unauthorized person, the employee or service provider who is aware of the disclosure must immediately inform the appropriate department manager, as well as the Clerk or delegated employees.

## 5.0 Live Viewing

Live viewing is restricted to time periods when there is a demonstrably higher likelihood of safety and security concerns involving employees, the public or corporate assets, or the commission of unauthorized activity in the area under surveillance. Live feed monitors are turned off when not in use.

## 6.0 Retention and Destruction

6.1 Video that has not been requested by the public, Township employees or law enforcement agencies within the maximum retention period is considered temporary and is automatically erased by being overwritten in accordance with the records retention by-law.

6.2 If video is proactively pulled in anticipation of a request, video may be stored for up thirty (30) calendar days. If no request is received within the thirty (30) days then it is manually deleted.

6.3 Digital recording equipment may only be destroyed when replaced by a new piece of equipment or when it is not repairable. It may only be destroyed by an authorized service person and it is destroyed in a manner that ensures that it can no longer be used by any person and that the information recorded cannot be reconstructed or retrieved by any person.

## Monitoring

This policy is reviewed periodically to ensure compliance with legislation and current business processes or as required based on legislative changes. Schedule “A” is amended by the Clerk as required.

## Authority

Section 28(2) of the *Municipal Freedom of Information and Protection of Privacy Act* authorizes the collection of personal information through video surveillance.

## Contact

Clerk  
P.O. Box 40, 44 Main Street  
Cobden ON K0J 1K0  
(613) 646-2282

## Change History

Policy Name	Effective Date	Significant Changes	By-law No.
<b>Corporate Video Policy</b>	October 1, 2019	New Policy	19-10-1213



# Corporate Policy

## Schedule "A"

### Camera Locations

Recreation & Tourism Department has two cameras, both located at the Cobden Astrolabe Arena. One camera is located in our plant room, strictly for monitoring the plant and condition of our ice. The second camera is located in lobby areas, closest to the front entrance.