

 University College of the North Policies & Procedures Manual	# Pages: Page 1 of 3	Policy Number: FA-01-01
	Approved by: President's Council	
Section: FACILITIES - GENERAL	Effective Date: December 4, 2023	
Title: VIDEO SURVEILLANCE	Replaces: New	

POLICY STATEMENT

University College of the North (UCN) is committed to public safety and protecting individual privacy rights in its use of video surveillance camera systems. This policy applies to all video surveillance owned or leased by UCN and is intended to enhance the safety and security of all persons and property including preventing, deterring crime, identifying suspects and gathering evidence.

PURPOSE OF POLICY

The purpose of this policy is to ensure the responsible use of all UCN video surveillance systems and to outline how video surveillance is managed, viewed, and stored. UCN will protect individual's privacy rights and adhere to the Freedom of Information and Protection of Privacy Act (FIPPA), and the Personal Health Information Act (PHIA).

PROCEDURES

1. Video Camera Placement

Before utilizing video surveillance technology, UCN considered alternative strategies to improve the safety and security of students, visitors and staff. Video surveillance has been limited to the coverage of common areas, exterior locations and areas that do not violate a person's reasonable expectation of privacy.

2. Expectation of Privacy

Students, visitors and staff have a reasonable and legal expectation of privacy in, and immediately around, their place of work and study. Cameras must not be directed to look into classrooms, offices or residences without due cause.

3. Public Notification

UCN is responsible for ensuring that clear and concise notices are posted about the use of video surveillance on its premises. Notices must be posted at each entry point to the public to inform individuals prior to entering the premises. This gives individuals the option of not entering the premises if they object to the surveillance.

4. Information Collected

The personal information collected through UCN's video surveillance includes image recordings, without any accompanying audio recordings. Information collected through

UCN's video surveillance is protected under privacy laws and will only be used for the purpose for which it was collected, or for purposes permitted by law. For example, if cameras are installed in an area for safety purposes, the information cannot be used to track the movements of individuals. However, if an issue occurs that impacts the safety and security of any persons and/or property, the video will be viewed by the appropriate UCN authority, and information collected may be disclosed to law enforcement or the appropriate authorities.

5. Viewing and Disclosing Recorded Information

The Facility Managers in Thompson and The Pas are the designated authorities who are authorized to approve access to view video surveillance recordings and to approve the disclosure of video surveillance recordings.

- a. The designated UCN authorities authorized access to view video surveillance recordings are:
 - i. The Facility Managers at the Thompson and The Pas campuses;
 - ii. The Director of Human Resources (HR) or designate;
 - iii. UCN Security in Thompson and The Pas; and
 - iv. The Coordinators of the Education and Training Centers or their designate
- b. Any disclosures made outside the organization shall be justified and documented if shared with law enforcement or the appropriate authorities for an ongoing investigation.
- c. Any event or incident that was captured on video that relates to a Workplace Safety and Health investigation may be reviewed by the investigator and/or investigative team as deemed necessary.
- d. Any event or incident that was captured on video that relates to an employment-related investigation may be viewed by the Director of HR and/or the designated investigator.
- e. UCN shall maintain logs of all video surveillance records. When surveillance records are viewed and/or disclosed for any purpose, each instance will be logged with specific details that indicate the specific information viewed/disclosed, by whom it was viewed and/or to whom it was disclosed, the date viewed/disclosed and the purpose for which it was viewed/disclosed.
- f. Any disclosure shall be limited to the minimum amount of information necessary to accomplish the purpose.
- g. The Information Technology Department will perform a periodic internal audit of the video surveillance records.

6. Storage, Retention and Destruction of Recorded Images

Video surveillance recordings are stored in a secure UCN location, and access is only granted on a need-to-know basis by authorized individuals. Recordings shall only be kept for as long as necessary to fulfill the purpose of collecting the video surveillance. A reasonable timeframe to keep recordings before they are erased or recorded over is 30 days or before the storage capacity reaches 80%. When an incident has been reported or suspected within that time frame the recording can be saved for investigation purposes.

Retention of records will be dependent on whether or not a suspected or actual incident has occurred to allow for appropriate action to be taken in response to the information recorded.

7. Privacy Information

Any questions or complaints related to the collection, use, or disclosure of personal information can be directed to:

Access and Privacy Officer
University College of the North
P.O. Box 3000
The Pas, MB R9A 1M7
Telephone: (204) 627-8500 or Toll Free: 1-800-627-8500
Website: www.ucn.ca

If an individual is not satisfied with the response received or the actions taken, they may contact the:

Manitoba Ombudsman
750 – 500 Portage Avenue
Winnipeg, MB R3C 3X1
Telephone: (204) 982-9130 or Toll Free: 1-800-665-0531
FaxL (204) 942-7803
Website: www.ombudsman.mb.ca/access

8. Waiver for Research Purposes

Users may request a waiver when restrictions in this policy interfere with the research, educational or service mission of UCN. Users must complete the New Application Form for UCN REB Research Ethics Certification and UCN REB Letter of Information/Consent Form, and submit them to the UCN REB Coordinator and UCN REB Chair.

RELATED POLICIES

AD-01-01 Privacy

RELATED INFORMATION

Government of Manitoba. *The Freedom of Information and Protection of Privacy Act.*
<https://web2.gov.mb.ca/laws/statutes/ccsm/f175.php?lang=en>

Government of Manitoba. *The Personal Health Information Act.*
<https://web2.gov.mb.ca/laws/statutes/ccsm/p033-5.php?lang=en>

Manitoba Ombudsman. *Video Surveillance Guidelines.*
<https://www.ombudsman.mb.ca/uploads/document/files/video-surveillance-guidelines-en.pdf>