REPORT TO THE LIBRARY BOARD

June 19, 2025

SUBJECT: **Video Surveillance Camera Policy**

PURPOSE: For Approval

PREPARED BY: Senior Team

PRESENTED BY: Michael Ciccone – CEO & Chief Librarian

RECOMMENDATION

It is recommended that the Library Board approve revised Video Surveillance Camera Policy.

BACKGROUND

The purpose of the Video Surveillance Cameras Policy is:

- To Govern London Public Library's (Library) management of Video Surveillance Cameras (VSCs),
- Ensure that the Library recognizes and balances the security benefits with an individual's right to privacy, and
- Ensure that use is in accordance with privacy legislation and the Library's *Access to Information and Protection of Privacy Policy*.

The current policy, a list of significant changes, and the revised policy are appended.

NEXT STEPS

This policy will be reviewed again in four (4) years (June 2029) as part of the Library's policy review process.

CURRENT POLICY

PURPOSE:

London Public Library (Library) endeavours to provide a safe and secure environment for the enjoyment of members of the public, Employees, Volunteers and anyone having business with the Library.

The safety and security of persons and library property is protected using a variety of means, including video surveillance cameras (VSC), as a part of its overall strategy to achieve this objective.

The purpose of this policy is to:

- Govern the Library's management of VSCs;
- Ensure that the Library recognizes and balances the security benefits with an individual's right to privacy, and
- Ensure that the use is in accordance with privacy legislation and the Library's *Access to Information and Protection of Privacy Policy*.

SCOPE:

This policy applies to all Library-owned VSC installations in all locations of the Library and does not apply to:

- VSC owned and installed by community partners in shared spaces;
- Cameras owned and installed in common-area spaces in buildings where the Library leases space, and
- Personal cameras, cellphone cameras, or other image-recording devices used by patrons as covered by the Library's *Photography/Videography/Filming Policy*.

DEFINITIONS:

Employee: a person who is employed by the Library and includes all Employees, including Page and Casual staff.

Incident Report: a report prepared by Employees or Security personnel that details an incident involving the public on Library property.

MFIPPA: Municipal Freedom of Information and Protection of Privacy Act.

Security: the service provider that is contracted to provide security services to the Library.

Library Video Surveillance Camera (VSC): a Library-owned stationary or rotating camera attached to a recording device that provides a visual record.

Volunteer: a person who voluntarily extends his or her services to actively support the Library, and who does so without remuneration.

POLICY STATEMENT:

The Library uses a variety of means to safeguard Employees, Volunteers, patrons and property by:

- Facilitating a safe and secure environment;
- Discouraging inappropriate and unlawful behavior of individuals on Library premises, and
- Supporting appropriate responses to incidents of inappropriate or unlawful behavior.

Given the challenges of an open public environment, the Library often uses video surveillance, where deemed necessary, recognizing the need to balance the security benefits with the privacy rights of an individual. This policy and accompanying procedures will adhere to MFIPPA.

VSCs increase the effectiveness of investigations of incidents and the Library will aid law enforcement through the provision of recordings when requested.

VSCs will only be used for security and safety purposes. They will not be used to monitor Employee or Volunteer performance unless the recording is identified as being related to a potential security, insurance or liability risk, potential breach of a municipal bylaw and/or potential commission of a Provincial or criminal offence.

VSCs may be permitted to be viewable in “real time” by Employees only as authorized by the CEO, and either the Director of Public Service or Director of Information Technology, to ensure patron safety and well-being in public spaces not regularly monitored by Employees, or Employee safety in non-public areas not regularly frequented (e.g. stairwells, elevators, parking lots, loading docks).

VSCs and the recordings generated by this equipment are the property of the Library and it retains custody and control of both.

SPECIFIC DIRECTIVES:

1. **Installation**

    a. **Factors for Consideration Pre-Installation**

        i. The use of VSCs shall be justified on the basis of verifiable and consistent reports of safety concerns;

        ii. A VSC shall augment other measures of deterrence or detection, and

iii. An assessment of privacy implications of VSC use shall be conducted prior to installation to minimize privacy intrusion to the extent practicable.

b. **Design and Installation Parameters**

i. VSCs may operate at any time in a 24-hour period, either continuously or with motion sensor activation;

ii. Only authorized personnel may operate VSC systems or adjust VSC positioning;

iii. VSCs shall not monitor the inside of areas where the public and Employees have a higher expectation of privacy, i.e. washrooms, change rooms, Employee break rooms;

iv. VSC supporting equipment shall be located in a controlled access area, and access by authorized personnel will require credentials, and

v. Every reasonable attempt will be made by authorized personnel to ensure designated “real-time only” monitors are not viewable by the public and/or unauthorized Employees.

c. **Notice of VSC Use**

i. The public shall be notified through clearly visible signage that surveillance is or may be in operation before entering a surveilled area; and

ii. Notification on signage shall identify the Library contact person and method(s) of contact who can answer questions about the surveillance.

2. **VSC Recordings**

a. The Library’s use, retention, and disclosure of VSC recordings shall comply with MFIPPA and all other relevant federal and provincial legislation related to personal privacy.

b. Recordings are retained for thirty (30) days. Archiving of recordings beyond thirty (30) days, where there are reasonable grounds that the data will be required for a specific investigation and/or follow-up to corroborate an Incident Report must be approved by the CEO & Chief Librarian (CEO) or designate. When recordings have been viewed for law enforcement or

public safety purposes, they will be retained for two (2) years unless otherwise compelled by law. The Library will take all reasonable efforts to ensure the safe and secure disposal of recordings not required beyond thirty (30) days.

c. All recordings shall be clearly identified (labelled) with date, time, location of origin and stored securely.

d. A log shall be maintained by Library Administration documenting activities relating to video surveillance, including access, use, and storage of recordings. This log will remain in a safe and secure location in the Administration Offices. Security personnel will also maintain a log to document viewing of recordings by law enforcement personnel. The Supervisor, Security will maintain a separate log to document requests by law enforcement personnel. Both Security logs will be provided to Administration on a monthly basis and maintained in the Library Administration log. Only authorized personnel may access logs**.**

3. Access/Review /Disclosure of Recordings

a. Any review of VSC recordings shall be undertaken for Library-authorized purposes and not on behalf of an inquiring member of the public or Employee.

b. Access to VSC recordings is limited to authorized Employees and Security personnel, who shall only access such recordings during the course of their regular duties. Authorized Employees include:

i. Designated members of Library Administration;

ii. Security Personnel at the Central Library;

iii. Staff Member(s) in Charge; and

iv. Employees or Volunteers who may be requested to view recordings for identification purposes.

v. The Library's Information Technology (IT) department is responsible for the maintenance of the VSC system, ensuring that the system functions as designed, and/or troubleshooting any issues that arise. IT Employees will generally not review the content of any recording other than in an ancillary manner which is unavoidable in the course of maintenance and troubleshooting. In the absence of the

Supervisor, Security, IT personnel will create a digital copy for law enforcement personnel when directed by Library Administration.

c. Access to VSC recordings by a member of the public must be requested in accordance with the requirements of MFIPPA and authorized through the CEO or designate.

d. Access to VSC recordings by law enforcement agencies will be provided in accordance with MFIPPA requirements and the Library's *Access to Information and Protection of Privacy Policy* and procedures. When recordings are viewed for law enforcement or investigative reasons, it shall be undertaken by an authorized person, in a private, controlled area that is not accessible to other Employees and/or Library patrons.

e. Authorized Employees and Security personnel are required to sign confidentiality agreements specific to surveillance and this policy.

f. Any unauthorized access and/or disclosure (privacy breach) shall be immediately reported to the CEO, who, following confirmation, will notify the Information and Privacy Commission of Ontario (IPC) and Library Board, investigate and mitigate.

4. Auditing and Evaluation

The Library will conduct an annual audit to evaluate the need for video surveillance, its use and compliance with legislation and Library policies and procedures.

5. Training

This policy and related training, including obligations under the MFIPPA, shall be incorporated into Employee and Security Personnel training programs for those authorized to have access to VSC equipment and/or recordings. Refresher training programs addressing obligations under the MFIPPA and/or this policy shall be conducted as needed.

INQUIRIES:

Director, Information Technology Services

CEO & Chief Librarian

SUMMARY OF SIGNIFICANT CHANGES

Definitions

Removed language in the Purpose and Policy Statement that was redundant or not directly related.

General cosmetic updates to the language and format of the document.

REVISED POLICY

PURPOSE

- To Govern London Public Library's (Library) management of Video Surveillance Cameras (VSCs),
- Ensure that the Library recognizes and balances the security benefits with an individual's right to privacy, and
- Ensure that use is in accordance with privacy legislation and the Library's *Access to Information and Protection of Privacy Policy*.

SCOPE

This policy applies to all Library-owned VSC installations in all locations of the Library and does not apply to:

- VSCs owned and installed by community partners in shared or common-area spaces in buildings where the Library leases or shares space, or
- Personal cameras, cellphone cameras, or other image-recording devices used by patrons as covered by the Library's *Photography/Videography/Filming Policy*.

DEFINITIONS

- **Employee**: means a person who is employed by the Library and includes all Employees, including Page and Casual staff.
- **Incident Report**: means a report prepared by Employees or Security personnel that details an incident involving the public on Library property.
- **Library Video Surveillance Camera (VSC)**: means a Library-owned stationary or rotating camera attached to a recording device that provides a visual record.
- **MFIPPA**: means the Municipal Freedom of Information and Protection of Privacy Act.
- **Security**: means the service provider that is contracted to provide security services to the Library.
- **Volunteer**: means a person who voluntarily extends his or her services to actively support the Library, and who does so without remuneration.

POLICY STATEMENT

Given the challenges of an open public environment, the Library uses VSCs where deemed necessary, recognizing the need to balance security benefits with individual privacy rights. This policy and accompanying procedures will adhere to MFIPPA.

- VSCs increase the effectiveness of investigations of incidents and the Library will aid law enforcement through the provision of recordings when requested.
- VSCs will only be used for security and safety purposes. They will not be used to monitor Employee or Volunteer performance unless the recording is identified as being related to a potential security, insurance or liability risk, potential breach of a municipal bylaw and/or potential commission of a provincial or criminal offence.
- VSCs may be permitted to be viewable in “real time” by Employees only as authorized by the CEO, and either the Director of Public Service or Director of Information Technology, to ensure patron safety and well-being in public spaces not regularly monitored by Employees, or Employee safety in non-public areas not regularly frequented (e.g. stairwells, elevators, parking lots, loading docks).
- VSCs and the recordings generated by this equipment are the property of the Library and it retains custody and control of both.

SPECIFIC DIRECTIVES

2. Installation

a. Factors for Consideration Pre-Installation

iii. The use of VSCs shall be justified based on verifiable and consistent reports of safety concerns.
iv. A VSC shall augment other measures of deterrence or detection.
v. An assessment of privacy implications of VSC use shall be conducted prior to installation to minimize privacy intrusion to the extent practicable.

d. **Design and Installation Parameters**

i. VSCs may operate at any time in a 24-hour period, either continuously or with motion sensor activation.
ii. Only authorized personnel may operate VSC systems or adjust VSC positioning.
iii. VSCs shall not monitor the inside of areas where patrons and Employees have a higher expectation of privacy, e.g. washrooms, change rooms, Employee break rooms.
iv. VSC supporting equipment shall be located in a controlled access area, and access by authorized personnel with require credentials.
v. Every reasonable attempt will be made by authorized personnel to ensure designated “real-time only” monitors are not viewable by the public and/or unauthorized Employees.

e. **Notice of VSC Use**

i. The public shall be notified through clearly visible signage that surveillance is or may be in operation before entering a surveilled area.
ii. The signage shall identify the Library contact person and method(s) of contact who can answer questions about the surveillance.

3. **VSC Recordings**

e. The Library's use, retention, and disclosure of VSC recordings shall comply with MFIPPA and all other relevant federal and provincial legislation related to personal privacy.

f. Recordings are retained for thirty (30) days. Archiving of recordings beyond thirty (30) days, where there are reasonable grounds that the data will be required for a specific investigation and/or follow-up to corroborate a Library-generated Incident Report, must be approved by the CEO & Chief Librarian (CEO) or designate. When recordings have been viewed for law enforcement or public safety purposes, they will be retained for two (2) years unless otherwise compelled by law. The Library will make all reasonable efforts to ensure the safe and secure disposal of recordings not required beyond thirty (30) days.

g. All recordings shall be clearly identified (labelled) with date, time, location of origin and stored securely.

h. A log shall be maintained by Library Administration, documenting activities relating to video surveillance, including access, use, and storage of recordings. This log will remain in a safe and secure location in the administrative offices. Security personnel will also maintain a log to document viewing of recordings by law enforcement personnel. The Supervisor, Security will maintain a separate log to document requests by law enforcement personnel. Both Security logs will be provided to Administration monthly and maintained in the Library Administration log. Only authorized personnel may access logs**.**

4. Access/Review /Disclosure of Recordings

g. Any review of VSC recordings shall be undertaken for Library-authorized purposes and not on behalf of an inquiring member of the public or Employee.

h. Access to VSC recordings is limited to authorized Employees and Security personnel during the course of their regular duties. Authorized Employees include:

vi. Designated members of Library Administration;
vii. Security Personnel at the Central Library;
viii. Staff Member(s) in Charge; and
ix. Employees or Volunteers who may be requested to view recordings for identification purposes.
x. The Library's Information Technology (IT) department is responsible for the maintenance of the VSC system, ensuring that the system functions as designed, and/or troubleshooting any issues that arise. IT Employees will generally not review the content of any recording other than in an ancillary manner, which is unavoidable during maintenance and troubleshooting. In the absence of the Supervisor, Security, IT personnel will create a digital copy for law enforcement personnel when directed.

i. Access to VSC recordings by a member of the public must be requested in accordance with the requirements of MFIPPA and authorized through the CEO or designate.

j. Access to VSC recordings by law enforcement agencies will be provided in accordance with MFIPPA requirements and the Library's *Access to Information and Protection of Privacy Policy* and procedures. When recordings are viewed for law enforcement or investigative reasons, it shall be undertaken by an authorized person, in a private, controlled area that is not accessible to other Employees and/or Library patrons.

k. Authorized Employees and Security personnel are required to sign confidentiality agreements specific to surveillance and this policy.

l. Any unauthorized access and/or disclosure (privacy breach) shall be immediately reported to the CEO, who, following confirmation, will notify the Information and Privacy Commission of Ontario (IPC) and Library Board, investigate and mitigate.

5. Auditing and Evaluation

The Library will periodically conduct an audit to evaluate the need for video surveillance, its use, and compliance with legislation and Library policies and procedures.

6. Training

This policy and related training, including obligations under the MFIPPA, shall be incorporated into Employee and Security Personnel training programs for those authorized to have access to VSC equipment and/or recordings. Refresher training programs addressing obligations under the MFIPPA and/or this policy shall be conducted as needed.

INQUIRIES:

Director, Information Technology Services
CEO & Chief Librarian