
Policy Title: Video Surveillance

Policy Number: 03-10-02

Section: **Corporate Administration**

Effective Date: **November 28, 2024**

Approved by:

Leadership Team

Subsection: **Security**

Last Review Date: **November, 2024**

Owner Division/Contact:

**Security Services, Enforcement Division,
Corporate Services Department**

Policy Statement

Video surveillance, when utilized with other security measures, is an effective means of ensuring the security and safety of City Facilities, the individuals who use them and the assets housed within them.

Purpose

The purpose of this policy is to establish guidelines for the use of Video Surveillance Systems which are intended to ensure the security and safety of City Facilities, the individuals who use them and the assets housed within them, while satisfying all legislative and compliance requirements and respecting the privacy rights of all individuals.

Specifically, this policy addresses requirements and responsibilities with respect to:

- The installation of Video Surveillance Systems
- The operation of Video Surveillance Systems, and
- The custody, control, access to, use of and retention of Accessed Recordings obtained through Video Surveillance Systems

Scope

This policy applies to all Video Surveillance Systems installed in all City Facilities.

For information on video/audio surveillance on Mississauga Transit buses refer to Corporate Policy and Procedure – 03-10-03 – Mississauga Transit Video/Audio Surveillance.

For information on cameras within the municipal road allowance refer to Corporate Policy and Procedure – 10-09-02 – Closed Circuit Television (CCTV) Traffic Monitoring Cameras within Municipal Road Allowances.

For information on privacy protection refer to Corporate Policy and Procedure – 03-02-12 – Privacy.

Legislative Requirements

This policy reflects the provisions of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), as amended.

Definitions

For the purposes of this policy:

“Accessed Recording” means information accessed from a Video Surveillance System by an Authorized Employee.

“Authorized Employee” means any employee authorized by the Manager, Security Systems to create an Accessed Recording.

“City” means the Corporation of the City of Mississauga.

“Facility” means any building, property or land that is either owned or occupied by the City, including but not limited to parks, marinas, golf courses and cemeteries.

“Freedom of Information Request” is a written request, submitted along with the application fee prescribed in the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), by a person seeking access to a Record.

“Manager” means the Manager, Security Systems, Security Services, Enforcement Division, or their designate.

“Protocol” refers to the Protocol for Accessing Video Surveillance Records in Board/City Shared Facilities, which sets out the governing rules and formalized process for the City and the Dufferin-Peel Catholic District School Board to follow when requesting access to each other’s video surveillance records.

“Recording” means information recorded by and stored on a Video Surveillance System which has not been accessed by an Authorized Employee.

“Video Surveillance System” or “System” refers to any system or device that enables continuous or periodic Recording of Facilities and/or individuals.

Installation of Video Surveillance Systems

The use of Video Surveillance Systems to enhance security and specific camera positions are determined based on criteria set out in the City’s Security Standards. All camera placements must be approved by the Director, Facilities and Property Management. Security Services will oversee the installation of Video Surveillance Systems on or in all City Facilities. Information on the existence, operation, and use of Video Surveillance Systems on or in any City Facility will be made available to the public.

Camera Location

Each proposed camera position will be assessed on a case-by-case basis to determine the effects the System may have on personal privacy. The City will take all reasonable steps to mitigate any adverse effects. No camera will be placed so that it views into an area where individuals have a high expectation of privacy, such as washrooms, change rooms or private buildings.

Signage

Signage will be installed in a clearly visible location at all Facilities which are subject to surveillance.

Approval

All locations for Systems and cameras and all signage require the approval of the Director, Facilities and Property Management.

Accountability**Directors**

All directors are accountable for:

- Ensuring all applicable managers/supervisors are aware of this policy and of any subsequent revisions, and
- Ensuring compliance with this policy

Security Services Staff/Authorized Employees

Security Services staff/Authorized Employees are responsible for:

- Completing required training on the operation of System equipment, including training on responsibilities with respect to protection of privacy and confidentiality, and
- Creating Accessed Recordings

Security Systems Staff

Security Systems staff are responsible for storing and disclosing Accessed Recordings.

Manager, Security Systems

The Manager, Security Systems is accountable for:

- Maintaining and reviewing procedures for the installation, operation and use of Video Surveillance Systems used on or in any City Facility
- Maintaining custody, control, access to and retention of all Recordings and Accessed Recordings
- Ensuring that all proposed changes to the existing System and newly proposed Systems meet the requirements of this policy, as well as other City policies, by-laws and legislation, prior to implementation
- Establishing appropriate training for the operation of System equipment, including training on responsibilities with respect to protection of privacy and confidentiality

- Designating persons to operate Video Surveillance Systems and maintaining an up-to-date list of all persons designated
- Designating Authorized Employees and maintaining an up-to-date list of all Authorized Employees, and
- Authorizing disclosure of Accessed Recordings

Managers/Supervisors

Managers/supervisors with staff who are responsible for the installation, operation, and use of Systems and/or for the custody, control, access to or retention of Recordings are accountable for ensuring staff in their respective work units are aware of and trained on this policy and any related procedures, as well as any subsequent revisions with respect to their job function.

Employees

Employees with duties related to the installation, operation, and use of Systems and/or the custody, control, access to or retention of Recordings are responsible for:

- Reviewing this policy and attending training related to this policy, as required
- Refraining from accessing, using, altering, destroying or erasing Recordings without proper authorization
- Protecting the privacy of individuals in compliance with MFIPPA, and
- Immediately reporting any unauthorized access to or disclosure of a Recording or Accessed Recording

Recordings

System Capacity

When video is recorded, it is stored in a secure manner on the System on which it was recorded. The storage capacity of each particular System varies with the amount of cameras in use at a location. When the storage capacity of the System at a location is reached, existing Recordings are automatically overwritten with real-time Recordings. Once this occurs, the overwritten Recordings are no longer available. The City makes reasonable efforts to ensure that Recordings are retained for 30 calendar days.

Retention of Recordings

Accessed Recordings are retained for the period specified in the Records Retention By-law 0097-2017, as amended. Recordings that have not been accessed are deemed transitory records and are not subject to the retention provisions set out in the Record Retention By-law.

Accessed Recordings

Requests for Access to System Information

Requests for Accessed Recordings must be in writing and directed, as appropriate, to either the Access and Privacy Unit in the form of a Freedom of Information Request or to Security Systems at crime.prevention@mississauga.ca. Requests received by Security Systems will be

assessed and prioritized according to the severity of the incident and applicable retention periods.

Creating an Accessed Recording

At the discretion of Security Systems staff, Accessed Recordings are created by Authorized Employees when:

- A security-related incident occurs
- An employee health and safety incident occurs
- Any incident occurs that may result in litigation or an insurance claim
- Police or another law-enforcement agency submit a request related to an active law-enforcement investigation to Security Services staff, and
- Required to respond to a Freedom of Information Request

Retention of Accessed Recordings

Accessed Recordings are deemed corporate records and are subject to the retention and destruction provisions set out in the Record Retention By-law.

Use of Accessed Recordings

Accessed Recordings should be used for the purpose(s) for which they were created, or a consistent purpose. Accessed Recordings are only to be used and/or disclosed to:

- Assess the effectiveness of safety and security measures taken at a particular Facility
- Investigate an incident involving the safety or security of people, Facilities or assets
- Provide law enforcement agencies with evidence related to an incident under active investigation
- Provide evidence, as required, to protect the City's legal rights
- Respond to a request for information under MFIPPA
- Investigate a critical bodily injury, as defined by and reported to, the Ministry of Labour
- Investigate an incident or allegation of employee misconduct
- Aid in the investigation of an existing or potential insurance claim filed against the City
- Aid Security Services in the investigation of acts of vandalism or criminal activity at City Facilities, or
- As required by law

While Recordings will not be used in place of general supervision of employees, if an Accessed Recording is created for a purpose consistent with this policy, and through subsequent review of the Accessed Recording it is found that an employee engaged in inappropriate behavior in contravention of a law or a City policy, the City may use the Accessed Recording to address the behavior as a performance issue in the workplace.

Procedure to Request Accessed Recordings – City Facilities

A Video Release Form must be completed and submitted to crime.prevention@mississauga.ca. For all requests related to investigations of serious employee misconduct, the Video Release

Form must be authorized by the Director of Human Resources. In all other cases, the Manager, Security Systems will determine whether disclosure will be provided. In making a determination, the Manager, Security Systems may consult with Legal Services and/or the City's Access and Privacy Officer.

When disclosure of an Accessed Recording is provided, the following information will be logged for audit purposes:

- The date and time on which disclosure was made
- The identification of the party to whom disclosure was made
- The reason for disclosure, and
- The extent of the information disclosed

Procedure to Request Accessed Recordings – Shared Facilities

Requests from either the City or the Dufferin-Peel Catholic District School Board for access to any Record created through a Video Surveillance System in a Shared Facility must be carried out in accordance with the Protocol. A formal access request to view Records must be made on the forms included as Appendix 1 and Appendix 2 of the Protocol. The Protocol and forms are located on Inside Mississauga on the Corporate Policies and Procedures website – Corporate Administration - Security.

Disclosure of Accessed Recordings

At the discretion of Security Systems staff, and in collaboration with the Access and Privacy Unit where applicable, disclosure may be provided in the following ways:

- Security Systems staff may provide a verbal or written summary of the Accessed Recording
- The Accessed Recording may be reviewed by the requestor in the presence of Authorized Employee, and/or
- A copy of the Accessed Recording may be provided in digital format

Anyone who receives a copy of an Accessed Recording from an Authorized Employee is required to sign an applicable Video Release Form.

Unauthorized Disclosure

Any employee with knowledge of unauthorized access to or disclosure of any Video Surveillance System Recording or Accessed Recording must immediately inform the Access and Privacy Officer who will determine appropriate next steps.

Compliance

Failure to comply with this policy, including any unauthorized access to or disclosure of Recordings or Accessed Recordings is cause for disciplinary action up to and including termination of employment.

Revision History

Reference	Description
GC-0616-2006 – 2006 12 13	N/A
October 20, 2009	Administrative revision to reference the shared facilities Protocol
June 2, 2021	Scheduled review. Revised to reflect current practices.
LT – 2024 11 28	Scheduled review. Substantial revision to clarify the relationship between “Recordings” and “Accessed Recordings” and to clarify the process for requesting and disclosing Accessed Recordings. References to business units updated to reflect current organizational structure.
2025 11 19	Housekeeping revisions to update titles to reflect current organizational structure.