



POLICY

No. 100

Department: Administration

SECURITY CAMERA POLICY

SCOPE:

This policy applies to all Town of Virden owned and operated security camera systems installed in or around municipal buildings, public facilities, parks, public works yards, recreation facilities, and other municipal properties where surveillance is reasonable necessary.

PURPOSE:

The purpose of this policy is to establish guidelines for use, management, and monitoring of Town of Virden security camera systems within the Town. Security cameras are used to enhance public safety, protect municipal property, and assets, support incident investigations, and assist in maintaining a safe environment for residents, staff, and visitors.

DEFINITIONS

Personal Information – Recorded information about an identifiable individual as defined under The Freedom of Information Protection of Privacy Act (FIPPA) of Manitoba, including images or video recordings where an individual can be reasonably identified.

Personal Health Information – Recorded information about an identifiable individual relating to their health, health care history, or the provision of health care services, as defined under The Personal Health Information Act (PHIA) of Manitoba.

Security Camera System – Any fixed or mobile video surveillance equipment owned, operated, or authorized by the Town of Virden for security, safety, or asset protection purposes.

Surveillance Recording – Any video footage, image, or recorded material captured by a Town of Virden security camera system, whether stored temporarily, or permanently.

Public Area – Any Town of Virden property or location where members of the public may reasonably be expected to enter, attend, or access, including parks, municipal buildings, recreation facilities, and public works sites.

POLICY OBJECTIVES:

1. Establish clear guidelines for the lawful and appropriate use of Town of Virden security cameras
2. Safeguard municipal assets, infrastructure, and public spaces
3. Maintain compliance with Manitoba's Freedom of Information and Privacy Protection Act (FIPPA) and the Personal Health Information Act (PHIA)
4. Establish clear standards for the collection, use, access, retention, and disclosure of surveillance recordings
5. Promote transparency and accountability in the operation and oversight of Town of Virden security camera systems.
6. Protect the safety and security of residents, visitors, employees, and municipal facilities

GENERAL

1. The municipality may install and operate security camera systems where necessary to support public safety, protect municipal property, and reduce the risk of vandalism, theft, unauthorized access, or other unlawful activity.
2. Security cameras shall only be used for legitimate purposes and in a manner that is reasonable, necessary, and proportionate to the identified concern. The use of surveillance must balance operational needs with the privacy rights of residents, visitors, employees, and members of the public.
3. All collection, use, disclosure, retention, and disposal of surveillance recordings shall comply with applicable legislation, including the Freedom of Information and Protection of Privacy Act (FIPPA) and The Personal Health Information Act (PHIA) where applicable.
4. Security cameras shall not be used for unauthorized surveillance, personal interest, or continuous employee performance monitoring unless specifically required for a lawful workplace safety or security purpose.
5. Visible signage should be posted where surveillance is in operation to ensure transparency and public awareness. Access to surveillance systems and recordings shall be restricted to authorized personnel only.
6. The Town of Virden reserves the right to review, relocate, modify, or remove security camera systems as operational requirements, legal obligations, or privacy considerations change.

GUIDING PRINCIPLES

1. **Necessity**
Security cameras shall only be installed where there is a demonstrated need and where less privacy-invasive alternatives are not sufficient.
2. **Reasonableness**
Camera placement and operation must be reasonable and proportionate to the identified security concern.
3. **Transparency**
The public shall be informed of surveillance through visible signage indicating that security cameras are in use.
4. **Privacy Protection**
Collection, use, disclosure, retention, and disposal of recorded footage shall comply with FIPPA and PHIA requirements.
5. **Accountability**
Access to surveillance systems and recordings shall be restricted to authorized personnel only, with clear responsibility for oversight and compliance.

CAMERA PLACEMENT AND USE

Security cameras may be installed in public-facing areas and municipal operational spaces where surveillance is justified.

Cameras shall not be installed in areas where individuals have a heightened expectation of privacy, including:

- Washrooms
- Change rooms
- Private offices (unless specifically justified for security purposes)
- Staff break rooms
- Medical treatment areas where PHIA protections apply unless legally authorized and necessary.

Camera placement shall minimize unnecessary capture of adjacent private property where reasonably possible.

Audio recording shall not be permitted unless specifically authorized by law and approved by the Chief Administrative Officer.

NOTICE AND SIGNAGE

Clearly visible signage shall be posted at entrances and monitored locations indicating:

- Security cameras are in operation
- The purpose of surveillance
- Contact information for municipal administration regarding questions about the system

Signage supports transparency and informs individuals that personal information may be collected under FIPPA.

ACCESS TO RECORDINGS

Access to live feeds and recorded footage shall be limited to authorized personnel designated by the Chief Administrative Officer or delegate.

Recorded footage may only be reviewed for legitimate municipal purposes including incident investigation, risk management, insurance matters, legal proceedings, or law enforcement requests.

Requests from law enforcement agencies shall be documented and managed in accordance with FIPPA, PHIA where applicable, and other relevant legislation.

Individuals may request access to records containing their personal information in accordance with applicable access to information legislation.

RETENTION AND DISPOSAL OF FOOTAGE

Recorded footage shall be retained only for as long as necessary to fulfill the purpose for which it was collected, unless required for an investigation, legal proceedings, insurance claim, or legislative requirement.

Routine surveillance recordings shall generally be retained for a period of 30 days unless otherwise required as stated above.

Secure deletion or destruction methods shall be used to ensure records are properly disposed of and cannot be reconstructed.

PROTECTION OF PERSONAL INFORMATION

All recorded footage containing personal information shall be protected against unauthorized access, use, disclosure, alteration, or destruction.

Where surveillance captures personal health information, handling shall comply with PHIA requirements, including additional safeguards, access restrictions, and confidentiality obligations.

Employees with access to recordings shall maintain confidentiality and may be subject to disciplinary action for misuse.

POLICY REVIEW

This policy shall be reviewed periodically, or sooner if required by legislative amendments, operational changes, or identified privacy concerns.



CHIEF ELECTED OFFICIAL



Date



CHIEF ADMINISTRATIVE OFFICER



Date