



## STAFF REPORT ACTION REQUIRED

12.

### Security Video Surveillance Policy

<b>Date:</b>	March 26, 2007
<b>To:</b>	Toronto Public Library Board
<b>From:</b>	City Librarian

### **SUMMARY**

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The adoption of the Security Video Surveillance Policy will ensure that, where security video surveillance systems are used by Toronto Public Library (TPL), the personal information collected about individuals visiting or working in Library premises is actively protected. This protection will be in compliance with the access and privacy provisions of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and with the request of the City of Toronto for its “Agencies, Boards, and Commissions to mirror in their by-laws the City of Toronto Security Video Surveillance Policy”.

### **RECOMMENDATIONS**

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**The City Librarian recommends that the Toronto Public Library Board:**

1. Approve the Security Video Surveillance Policy (Attachment 1);
2. Approve the revised Access to Information and Protection of Privacy Policy (Attachment 2);
3. Receive the list of security video surveillance locations (Attachment 3) for information;
4. Receive the City of Toronto Council’s Security Video Surveillance Policy (Attachment 4) for information.

## **Implementation Points**

Staff has developed a plan to review existing security video surveillance installations and procedures, and to implement any steps required to ensure the Library's compliance with the Policy.

## **FINANCIAL IMPACT**

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This report has no immediate financial implications. However, implementation of this Policy may require a phased upgrading of some existing security video surveillance systems. Implementation of the Policy will also require staff training for all operators and staff who have authorized access to the video surveillance systems. The costs associated with implementation of this Policy will be accommodated within the existing operating and capital budgets.

## **DECISION HISTORY**

At its meeting of January 16, 2006, the Toronto Public Library Board approved the Access to Information and Protection of Privacy Policy. This Policy complies with MFIPPA and ensures that Toronto Public Library protects the privacy of any personal information which it collects, uses, and/or discloses.

In July 2006, the City of Toronto Council adopted a Security Video Surveillance Policy and requested its "Agencies, Boards and Commissions to mirror [the Policy] in their by-laws."

During the drafting of its Policy, the City worked directly with the Information and Privacy Commissioner's Office/Ontario (IPC), which is responsible for overseeing the implementation of MFIPPA.

## **ISSUE BACKGROUND**

Video surveillance collects significant personal information about many individuals. Organizations, therefore, have to balance the security benefits of video surveillance with the rights of individuals to be free from unwarranted intrusion, use and disclosure of their personal information.

The IPC has published Guidelines for organizations governed by the Act that use, or plan to use, video surveillance for security reasons. The City of Toronto used the Guidelines in the development of their own Policy. The Guidelines give clear recommendations for limiting intrusion on the privacy of individuals who come within the range of surveillance cameras:

- i) the benefits of surveillance should substantially outweigh the reduction of privacy inherent in collecting personal information using a video surveillance system;
- ii) the use of each camera should be justified on the basis of verifiable, specific reports of incidents of crime or significant safety concerns; and

- iii) video surveillance should only be used when other means, such as foot patrols, are not feasible or are substantially less effective.

The Guidelines also provide recommendations about what should be included in a security video surveillance policy, and on the installation, management, operation and maintenance of surveillance systems.

TPL currently operates video security cameras at 23 locations (two of which are administration locations). Eleven of these locations have cameras inside the building. A list of the locations is provided in Attachment 3.

## **COMMENTS**

The TPL Security Video Surveillance Policy applies to the installation and operation of surveillance cameras for the safety of Library visitors and staff, and for the purposes of property security. It has been developed with detailed reference to the Library's Access to Information and Privacy Policy, the City of Toronto Security Video Surveillance Policy, and the IPC Guidelines. The proposed Policy has been discussed with the Union. The Policy closely mirrors the purpose of the City Policy.

The Policy provides direction on:

- i) Guidelines for protecting privacy when designing and installing video surveillance equipment in any Library location;
- ii) Notice to be provided to Library visitors about the presence of a surveillance system;
- iii) Practices and procedures to implement to keep the collected records secure from unauthorized viewing or access;
- iv) Retention periods for surveillance records, and disposal methods;
- v) Procedures for authorized access to records;
- vi) Actions in the event of an unauthorized access or disclosure of records;
- vii) Staff accountabilities for implementing the Policy.

Three revisions are proposed to the Library's Access to Information and Protection of Privacy Policy:

- i) Insertion of a reference to the Security Video Surveillance Policy in the Policy's Underlying Principles (p.2);
- ii) A change of wording under "Policy Statement: Protection of Privacy: Users – Disclosure of Information" (p.2). The changed wording extends the Statement's coverage from "personal information related to items borrowed by a user" to "personal information related to a library visitor or user";
- iii) Insertion of an option to charge an administration fee for providing general records, as is permitted by MFIPPA (p.6).

## **CONTACT**

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## **SIGNATURE**

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City Librarian

## **ATTACHMENTS**

- Attachment 1: Security Video Surveillance Policy
- Attachment 2: Access to Information and Protection of Privacy Policy
- Attachment 3: Surveillance Camera Locations
- Attachment 4: City of Toronto Council Security Video Surveillance Policy