



**STAFF REPORT
ACTION REQUIRED**

Security Camera Policy

Date: October 27, 2025

To: Toronto Public Library Board

From: City Librarian

SUMMARY

The purpose of this report is to present a new Security Camera Policy (the “Policy”) for approval by the Toronto Public Library Board. The draft Policy is included as Attachment 1.

This Policy replaces the Security Video Surveillance policy and supports Toronto Public Library’s (TPL) strategic goal of providing safe, welcoming, and high-quality public spaces. It also strengthens TPL’s ongoing commitment to equity, diversity, and inclusion by ensuring that security technologies do not create or reinforce barriers for equity-deserving communities.

The Policy outlines the principles and standards that guide the installation and use of security cameras across TPL locations. It is designed to enhance public safety while upholding human rights, personal privacy, and accessibility. The Policy clarifies how TPL will meet or exceed legislative obligations, including

those set out in the Ontario Human Rights Code and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

In addition to establishing governance over the use of security cameras, the Policy outlines complementary safety and security practices such as signage, design considerations, staff training, and procedures that:

- promote human dignity and uphold rights protected by law;
- align with the Accessibility for Ontarians with Disabilities Act (AODA);
- support the overall health, safety, security, and wellness of Library staff and customers.

An Implementation Plan will be developed to phase-in Policy initiatives in the short, medium, and long term, as part of TPL's capital and operational planning processes. In particular, TPL spaces will be designed or retrofitted with additional or enhanced security camera technology features through planned renovations and new construction projects as part of the Facilities Master Plan, State-of-Good Repair plans, and within annual capital and operating budgets.

RECOMMENDATIONS

The City Librarian recommends that the Toronto Public Library Board:

1. approve the Security Camera Policy as outlined in Attachment 1;
2. rescind the Security Video Surveillance Policy (2018) appended as Attachment 2; and
3. direct Library staff to develop a phased Implementation Plan that includes short, medium, and long-term initiatives.

FINANCIAL IMPACT

There is no financial impact associated with this Policy beyond what is already allocated in TPL's 2026 capital and operating budgets.

The Director, Finance & Chief Financial Officer has reviewed this financial impact statement and agrees with it.

ALIGNMENT WITH STRATEGIC PLAN

The Policy supports TPL's strategic direction to ensure that all members of the public can safely and comfortably use Library spaces. Additionally, this Policy commits the Library to ongoing staff training and public communications, which clearly set out expectations to provide and contribute to a welcoming and supportive environment for both Library staff and the public in a mutually respectful manner. By applying best practices in security while prioritizing equity and accessibility, this Policy advances TPL's commitment to safe and secure public service delivery.

EQUITY IMPACT STATEMENT

The Security Camera Policy was developed through a lens of equity and inclusion, with a focus on minimizing any disproportionate impacts of surveillance on equity-deserving communities. It reaffirms TPL's commitment to human rights and inclusive service by establishing safeguards to prevent discriminatory or biased use of security technologies.

The Policy also emphasizes transparency and accountability in how surveillance data is collected, stored, accessed, and used, aligning with the principles of procedural fairness and informed consent.

DECISION HISTORY

At its meeting on April 25, 2022, the Library Board considered the report [Toronto Public Library's Policy Development Framework](#) and approved TPL's Policy Development Framework, which sets out how policies are developed, reviewed and approved for TPL.

At its meeting on September 24, 2018, the Library Board approved the [Security Video Surveillance Policy](#).

COMMENTS

Security cameras are one of several tools that support TPL's efforts to maintain a safe, respectful, and welcoming environment. This Policy was developed through internal and external consultations, building on prior community engagement efforts related to TPL's Strategic Plan, Accessibility Plan, the Safety and Security Discussion Table, and Rules of Conduct.

The revised Policy:

- Formalizes and updates existing practices regarding camera installation and use.
- Reflects best practices from other public institutions, including urban libraries and municipalities.
- Incorporates input from key stakeholders such as Toronto Public Health, the City's People & Equity Division, and Legal Services.
- Aligns with broader City initiatives such as SafeTO, and the City's strategy to create, safe, inclusive and accessible public spaces.

TPL staff also consulted with neighboring Toronto Municipal entities, and public library systems in other Canadian cities to identify effective and equitable approaches to security camera use.

POLICY OVERVIEW

The Security Camera Policy establishes a framework for the ethical and appropriate use of security camera technology at TPL locations.

Its key principles include:

- The use of security cameras as a tool intended to enhance safety, not replace human interaction or staff presence.
- All practices related to security cameras must respect the dignity, rights, and privacy of individuals using Library spaces.
- Security camera operation must not disproportionately target or negatively impact any group, particularly those protected under the Ontario Human Rights Code.
- Camera use will be governed by clear procedures regarding placement, data collection, access, retention, and disposal.

The Policy also requires that:

- Security camera signage be clear, visible, and informative to the public.
- Cameras are not installed in sensitive areas such as washrooms, change rooms, or staff break spaces.
- Procedures be put in place to review complaints or concerns about camera usage or potential violations of privacy or equity.

Development of an Implementation Plan

TPL staff will develop an Implementation Plan to guide Policy rollout across the system. This will include infrastructure changes, staff training, and the development of communications materials.

Short- to Medium-Term Initiatives (1–5 years):

- Continue assessments of current camera locations and infrastructure.
- Update signage to meet Policy and accessibility standards.
- Develop standard operating procedures and guidelines for video access and retention.
- Deliver training for staff and contracted security personnel.
- Establish mechanisms for complaint resolution and public inquiries.
- Provide FAQs to communicate and provide resources for resolving complaints regarding security cameras.
- Publish clear, accessible information on the Policy for Library users.

Long-Term Initiatives:

- Integrate inclusive and equitable security camera technology design principles into all new construction and renovation projects.
- Continue stakeholder engagement to ensure ongoing alignment with evolving public expectations, technological standards, and legal requirements.

CONTACT

Alyssa Van Graft; Director, Enterprise Projects and Facilities Management; Tel: 416-395-5541; Email: avangraft@tpl.ca

Shawn Mitchell; Director, Policy, Planning & Performance Management; Tel: 416-395-5601; Email: smitchell@tpl.ca

SIGNATURE

Moe Hosseini-Ara
City Librarian

ATTACHMENTS

Attachment 1: Security Camera Policy
Attachment 2: Security Video Surveillance Policy

Policy Title: Security Camera Policy
Policy Classification: Board Policy

Page 1 of 8

SECURITY CAMERA POLICY

Policy Classification: Board Policy

Motion # and Approval Date:

Motion # and Last Revision Date:

07 - 057 - March 26, 2007

18 - 157 - September 24, 2018

Purpose

The Toronto Public Library (TPL or “the Library”) strives to maintain a safe and welcoming environment for Library Users, which includes Library customers, staff, volunteers and service providers, while protecting individual rights to privacy. TPL recognizes the use of security cameras at Library facilities as part of the Library’s overall strategy to ensure the safety of persons and property. This Policy defines appropriate management and use of security cameras within the Library.

Scope

This Policy applies to all camera systems deployed by TPL at Library owned and/or leased properties, including the installation, operation, and maintenance of security cameras. This Policy also applies to all Library Users and all types of security camera systems, including security camera monitors and security camera recording devices at Library-managed facilities.

This Policy does not apply to video recording cameras used for employment-related or labour-related information. This Policy does not address instances where Library Users or approved third parties record a specific event or activity (such as a program, or presentation). For clarity, this Policy does not apply to non-TPL owned or operated camera systems at co-located Library facilities that share

space with other community entities and have security cameras owned and operated by these other entities and not by the Library.

Underlying Principles

TPL's security camera systems are a resource used by the Library to promote the safety of TPL Users while striving to minimize intrusions upon personal privacy. Where deployed for these purposes, security camera systems also help to protect Library property against theft or vandalism and can assist in the identification of individuals violating the Library's Rules of Conduct.

In the event of a reported or observed incident, the review of recorded information may be used to assist in a Library investigation of the incident or may be requested by law enforcement for the purpose of a law enforcement investigation. The Library will always maintain control of and responsibility for its security camera system.

This Security Camera Policy helps ensure that the Library follows the guidelines set out by the Information and Privacy Commissioner of Ontario, and the privacy requirements of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), without compromising the safety and security of Library Users and facilities.

Policy Statement

This Policy is in place to maintain public safety and security of property through adequate planning and installation of security cameras in Library facilities. The deployment of security cameras and monitoring systems is achieved through the consistent use of an evidence-based approach to camera deployment, guided by the principle of minimal intrusion by security camera systems into Library User privacy and the daily operation of Library facilities. Library-owned facilities are monitored in the interests of public safety, protection of property, and to maintain a safe and welcoming environment for Library Users.

1. General

- 1.1. Library security camera systems will balance privacy considerations with contributing to a welcoming and supportive environment throughout Library spaces by deterring violations of TPL's Rules of Conduct policy, as well as providing evidence to support the investigation of violations of the Rules of Conduct policy.
- 1.2. Only authorized Library staff and service providers are permitted to operate or have access to the Library's security camera systems.
- 1.3. All authorized staff and service providers are expected to review and comply with this Policy, the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and other relevant statutes, applicable guidelines, and standards, in performing any duties and functions that are related to the operation of the security camera systems.
- 1.4. To ensure a common understanding of how Library security camera systems operate and contribute to the overall safety and security of Library Users and the Library's facilities and property, the Library will:
 - Consult and communicate changes in security camera system functionality regularly with all authorized staff and service providers; and
 - Ensure that staff and service providers are well-informed of this Policy and its related guidelines and standards and understand their application.

2. Design and Installation of Security Camera Systems

- 2.1. The Library commits to developing and implementing security camera system design and privacy features in all areas identified as requiring security cameras.

- 2.2. Where the City of Toronto or Province of Ontario has provided for relevant security equipment design and installation standards, the Library will meet or surpass those standards.
- 2.3. Security camera systems will be designed or redesigned to ensure the safety of Library Users and facilitate equity, inclusivity, and accessibility.
- 2.4. Where possible, security camera recording will be restricted to periods when there is a demonstrably higher likelihood of Rules of Conduct violations being committed and detected in the area under security camera recording. Given the open and public nature of the Library's facilities and property, security camera recording may operate 24 hours a day if deemed appropriate for the purposes of safety and security.
- 2.5. Security camera equipment will never monitor the inside of areas where individuals have a higher expectation of privacy (e.g. change rooms and washrooms).
- 2.6. Every reasonable effort will be made to ensure security camera monitors, or other equipment capable of displaying footage, are not in a position that enables unauthorized individuals to view footage.
- 2.7. Security camera systems and footage will be safeguarded in accordance with the requirements set out in TPL's Information Security policy for systems containing personal information.

3. Security Camera Recording Signage

- 3.1. The Library will use clear and prominent signage to provide appropriate notice of TPL-owned security cameras in use. Signage will be visible to Library Users, at all entrances to a Library facility where security cameras are used and/or on the perimeter of the area monitored by security cameras, and will include the following information:
 - The legal authority for the collection of personal information.
 - The principal purpose(s) for which the personal information is intended to be used.

- The title, business address, and telephone number of someone who can answer questions about the security camera footage.

4. Security Camera System Access

- 4.1. Only authorized Library staff or service providers will be permitted to operate security camera systems or modify system settings and/or camera angles.
- 4.2. Only authorized Library staff or service providers will be permitted to view and/or extract camera footage within video recording systems. Camera recording extraction will be conducted in a secure area inaccessible to unauthorized individuals.
- 4.3. All requests for security camera footage are subject to the requirements of MFIPPA and the Library's Access to Information and Protection of Privacy Policy. This includes but is not limited to the prohibition of all Library employees from access or use of information from the security camera system, its components, files, or database for personal reasons.
- 4.4. Requests for security camera information are to be directed as per this Policy and the accompanying Security Camera Guidelines.

5. Security Camera Footage: Law Enforcement

- 5.1. If access to a security camera record is required for the purpose of a law enforcement investigation, the requesting Law Enforcement Officer must make the request in writing by completing the Form specified by TPL with the required information.
- 5.2. Requests will be reviewed on a case-by-case basis. The Library will comply with such requests in accordance with MFIPPA and other applicable laws and regulations.
- 5.3. When granting access, the Library will provide the recording for the specified date and time of the incident requested by the Law.

Enforcement Officer, subject to MFIPPA exemptions. Approved recordings will be provided through a secure means of access.

- 5.4. The Library will maintain documentation of all requests and the Library's response, for accountability and transparency.

6. Retention and Disposal of Security Camera Footage

- 6.1. The Library's security camera footage is subject to the following retention periods under the Library's records retention schedule:
 - Library security camera footage will be retained for a maximum of thirty (30) days from the date of the original creation and collection by the security camera system, except as described below; and
 - Library security camera footage used by the Library, including as part of a Rules of Conduct, safety, security, or law enforcement investigations, or for freedom of information or other evidentiary purposes, will be retained for a minimum of one (1) year from the conclusion of the matter for which it has been used.
- 6.2. The Library will take all reasonable efforts to ensure the security of records in its control/custody and ensure their safe and secure disposal. Old storage devices must be disposed of in accordance with an applicable technology asset disposal process ensuring personal information is erased prior to disposal and cannot be retrieved or reconstructed. Disposal methods may include shredding, burning, or erasing depending on the type of storage device.
- 6.3. Any Library employee who becomes aware of any unauthorized use or disclosure of footage has a responsibility to ensure that Policy, Planning and Performance Management is immediately informed of the privacy breach.

Accountability

The Director, Enterprise Projects & Facility Management, Director, Branch Operations & Customer Experience and Director, Policy, Planning & Performance Management are accountable for implementation of this Policy.

Related Legislation

- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), R.S.O. 1990, c. M. 56
- Occupational Health and Safety Act, R.S.O. 1990 c.0.1
- Guidelines for Using Video Surveillance, Information and Privacy Commissioner of Ontario. 2015.

Related Library Policies

[Accessibility for Persons with Disabilities Policy](#)

[Access to Information and Protection of Privacy Policy](#)

[Human Rights and Anti-Harassment/Discrimination Policy](#)

[Rules of Conduct Policy](#)

Definitions

Accessibility: Refers to the absence of barriers that prevent individuals and/or groups from fully participating in all aspects of society. The term is often linked to people with disabilities and their rights to access goods, services, employment opportunities, and facilities.

Library User: Includes anyone who uses the Library's spaces, e.g., Library customers, Library staff, volunteers, or service providers.

Personal Information: Recorded information about an identifiable individual, including,

(a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,

- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except if they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (g) the views or opinions of another individual about the individual, and
- (h) the individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

Contact

Director, Enterprise Projects & Facilities Management

POLICY: **SECURITY VIDEO SURVEILLANCE**

SECTION: **Section V – Municipal Freedom of Information and
Protection of Privacy Act, R.S.O. 1990, c. M. 56**

MOTION#/DATE: **07 - 057 – March 26, 2007**
18 - 157 – September 24, 2018

Effective Date: September 24, 2018

Table of Contents

| | |
|----------------------------------------------------------------------------------------|---|
| Policy Objective | 3 |
| Underlying Principles | 3 |
| Policy Statement | 3 |
| Scope | 4 |
| Application | 4 |
| Specific Directives | 4 |
| A. Protocol for Implementation of a Video Surveillance System at a particular site: | 4 |
| 1. Factors to Consider Prior to Using Video | 4 |
| 2. Designing and Installing Video Surveillance Equipment | 5 |
| 3. Notice of use of Video Systems | 5 |
| 4. Personnel Authorized to Operate Video Equipment | 6 |
| B. Video Equipment/Records | 6 |
| 1. Types of Recording Device | 6 |
| 2. Record Identification | 6 |
| 3. Record Keeping | 6 |
| C. Access to Video Records | 7 |
| 1. Access | 7 |
| 2. Storage | 7 |

| | |
|-----------------------------------------------------------------------------|----|
| 3. Formal Access Requests Process | 7 |
| 4. Access: Law Enforcement | 7 |
| 5. Viewing Images | 8 |
| 6. Custody, Control, Retention and Disposal of Video Records/ Recordings | 8 |
| 7. Unauthorized Access and/or Disclosure (Privacy Breach) | 9 |
| 8. Inquiries from the Public Related to the Video Surveillance Policy | 9 |
| Accountability | 9 |
| Appendices | |
| Appendix 1: References | 12 |
| Appendix 2: Definitions | 13 |
| Appendix 3: Contacts | 14 |

Policy Objective

The purpose of the Video Surveillance Policy is to describe Toronto Public Library's installation and use of video surveillance equipment in the interests of privacy, public safety, protection of property, and to maintain a safe and welcoming environment for library customers, staff, and service providers.

Underlying Principles

Underlying the Policy Objective is Toronto Public Library's commitment to maintaining a safe and welcoming environment for staff and members of the public. Toronto Public Library will achieve this through a modern, cohesive security system which strives to minimize intrusions upon the personal privacy of customers, staff, and service providers. Video surveillance is to be deployed on the basis of a formal needs-assessment carried out by designated Toronto Public Library staff. Through the use of a prescribed protocol, designated staff will be empowered to determine how video surveillance equipment will be deployed based on Toronto Public Library's security needs. Video surveillance will only be deployed for identifiable purposes which are consistent with this Policy.

The Security Video Surveillance Policy provides detailed direction concerning the context, procedures, and protocols within which the Library installs and operates surveillance cameras. The Policy ensures that the Library follows the guidelines set out by the Information and Privacy Commissioner of Ontario, and the privacy requirements of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), without compromising the safety and security of Library visitors, staff, and premises.

Policy Statement

This Policy is in place to maintain public safety and security of property through adequate monitoring of library facilities. The deployment of surveillance cameras and monitoring systems is achieved through the consistent use of an evidence based approach to camera deployment. This protocol is detailed under the "Specific Directives" section of this Policy. Video surveillance deployment is guided by the principle of minimal intrusion by video surveillance systems into the daily operation of library facilities. Video surveillance systems are deployed only when needed based on criteria established within the Specific Directives. Library premises are monitored in the interest of asset protection, and to maintain safe library premises that are welcoming to

library staff and visitors.

Scope

This Policy applies to all surveillance camera systems, deployed across all Library owned and/or leased properties. This Policy does not apply to video surveillance used for employment-related or labour-related information.

Application

This Policy applies to all Toronto Public Library staff and contracted workers. All parties will be made aware of this Policy, their obligation to comply with it, and given instructions in meeting the Policy's requirements.

Specific Directives

A. Protocol for Implementation of a Video Surveillance System at a particular site:

The Toronto Public Library has developed a needs based assessment process for acquisition and installation of a surveillance camera. The documents developed in relation to this are:

- A. TPL Security Video Surveillance System Needs Assessment Form;
- B. Process for Acquiring Security Camera Equipment

1. Factors to Consider Prior to Using Video

Before deciding to install video surveillance, the following factors must be considered:

- (a) The number of verifiable incidents of crime or significant safety concern;
- (b) The level of risk to the safety of staff and customers posed by such incidents;
- (c) the potential for violation of the Library's Rules of Conduct;
- (d) A video surveillance system should only be considered after other measures of deterrence or detection have been considered and rejected as unworkable;
- (e) On a system wide basis, a Privacy Impact Assessment (PIA) must be conducted on the effects that the proposed video surveillance may have

on personal privacy. The PIA should indicate mitigation strategies to limit adverse effects relating to privacy; and

- (f) The proposed design and operation of the video surveillance systems should minimize privacy intrusion.

2. Designing and Installing Video Surveillance Equipment

When designing a video surveillance system and installing equipment, the following must be considered:

- (a) Given the open and public nature of the Library's facilities and property, and the need to provide for the safety and security of individuals who may be present at all hours of the day, the Library's video surveillance systems may operate at any time in a 24-hour period;
- (b) The video equipment shall be installed to monitor only those spaces that have been identified as requiring video surveillance;
- (c) The ability of authorized personnel to adjust cameras shall be restricted so that authorized personnel cannot adjust or manipulate cameras to overlook spaces that are not intended to be covered by the video surveillance program;
- (d) Equipment shall never monitor the inside of areas where individuals have a higher expectation of privacy (e.g. change rooms and washrooms);
- (e) Where possible, video surveillance should be restricted to periods when there is a demonstrably higher likelihood of crime being committed and detected in the area under surveillance;
- (f) Reception/recording equipment must be located in a strictly controlled access area. Only authorized personnel shall have access to the controlled area and the reception/recording equipment; and
- (g) Every reasonable attempt should be made by authorized personnel to ensure video monitors are not in a position that enables the public and/or unauthorized staff to view the monitors.

3. Notice of Use of Video Systems

In order to provide notice to individuals that video surveillance is in use:

- (a) The Library shall display signs, visible to members of the public, at all entrances to a premise where video surveillance is being utilized and/or on the perimeter of the area under video surveillance;
- (b) The notification requirements of this sign must inform individuals of:
 - (i) the legal authority for the collection of personal information;
 - (ii) the principal purpose(s) for which the personal information is intended to be used; and
 - (iii) the title, business address, and telephone number of someone who can answer questions about the collection.

4. Personnel Authorized to Operate Video Equipment

Only authorized staff shall be permitted to operate video surveillance systems.

B. Video Equipment/Records

1. Types of Recording Device

The Library may use either recording mechanisms that record information directly on a hard-drive or recording mechanisms using a removable/portable storage device in its video systems. Facilities using video recorders will retain these records in accordance with the specified retention periods.

2. Record Identification

All records (storage devices) shall be clearly identified (labeled) as to the date and location of origin including being labeled with a unique, sequential number or other verifiable symbol. In facilities with a DVR that stores information directly on a hard-drive, the computer time and date stamp shall be understood to be this identification. In facilities with a VCR or other recording mechanism using a removable/portable storage device, the authorized personnel shall affix a label to each storage device identifying this information.

3. Record Keeping

Policy, Planning and Performance Management (PPPM) is the office of record for disclosure requests that are received either electronically or in

paper format. Requests are to be scanned, or photographed and e-mailed to disclosure@torontopubliclibrary.ca. A hard copy is to be delivered to the Data Governance and Privacy Risk Advisor via inter-office mail. Staff are not to retain copies of images on their personal devices. Once an image of a form is sent via e-mail, any existing electronic copies of the image must be destroyed from personal devices.

C. Access to Video Records

1. Access

Access to the video surveillance records shall be restricted to authorized personnel, and only in order to comply with their roles and responsibilities as outlined in the Security Video Surveillance Policy.

2. Storage

All storage devices that are not in use must be stored securely in a locked receptacle located in an access-controlled area.

3. Formal Access Requests Process

With the exception of requests by law enforcement agencies, all formal requests for video records should be directed to PPPM. Requests are subject to the requirements of MFIPPA and the Library's Access to Information and Protection of Privacy Policy.

4. Access: Law Enforcement

If access to a video surveillance record is required for the purpose of a law enforcement investigation, the requesting Law Enforcement Officer must complete the Disclosure of Personal Information Form and forward it to the authorized staff member. The authorized staff member will provide the recording for the specified date and time of the incident requested by the Law Enforcement Officer, subject to MFIPPA exemptions.

It is important to complete the Disclosure of Personal Information Form when

requesting video surveillance footage. The Disclosure of Personal Information Form serves as the record for the request and is maintained and stored by PPPM.

Authorized Library staff are to provide law enforcement with a secure means of accessing video footage, as directed by PPPM in the circumstances.

5. Viewing Images

When recorded images from the cameras must be viewed for law enforcement or investigative reasons, this must only be undertaken by an authorized personnel, in a private, controlled area that is not accessible to other staff and/or visitors.

6. Custody, Control, Retention and Disposal of Video Records/Recordings

The Library retains custody and control of all original video records not provided to law enforcement. Video records are subject to the access and privacy requirements of MFIPPA, which include but are not limited to the prohibition of all Library employees from access or use of information from the video surveillance system, its components, files, or database for personal reasons.

The Library will take all reasonable efforts to ensure the security of records in its control/custody and ensure their safe and secure disposal. Old storage devices must be disposed of in accordance with an applicable technology asset disposal process ensuring personal information is erased prior to disposal, and cannot be retrieved or reconstructed. Disposal methods may include shredding, burning, or erasing depending on the type of storage device.

Records and information collected from the video recording system are subject to the following retention periods under the Library's record retention schedules:

- (i) Information will be retained for a maximum of thirty (30) days from the date of the original collection by the video surveillance system, except as described in (ii); and

(ii) Information collected from the video recording system used by the Library or a law enforcement agency as part of a criminal, safety, or security investigation or for evidentiary purposes will be retained for a minimum of one (1) year from the conclusion of the matter for which it has been used.

7. Unauthorized Access and/or Disclosure (Privacy Breach)

Any Library employee who suspects a privacy breach should refer to the Privacy Breach Protocol available on ShareTPL.

Any Library employee who becomes aware of any unauthorized disclosure of a video record in contravention of this Policy, and/or a potential privacy breach has a responsibility to ensure that PPPM is immediately informed of the breach.

8. Inquiries from the Public Related to the Video Surveillance Policy

A staff member receiving an inquiry from the public regarding the Video Surveillance Policy shall direct the inquiry to PPPM.

Accountability

1. The Directors' Committee is responsible for:
 - (a) Approval of the installation of video surveillance cameras
2. Directors with responsibilities for facilities management, including the Director for Transformational Projects and the Director for Branch Operations and Customer Experience are responsible for:
 - (a) Assessing proposed installations of video surveillance equipment after a Security Video Surveillance Needs Assessment has been completed
3. The Director, PPPM is responsible for:

- (a) Documenting, implementing, and enforcing the Library's privacy and access compliance policies;
- (b) Responding to formal requests to access records, including law enforcement inquiries;
- (c) Providing advice, training and recommendations to staff to assist in compliance with MFIPPA;
- (d) Undertaking periodic evaluation of TPL's video surveillance systems to ensure compliance with this Policy;
- (e) Reviewing this Policy on a regular basis, and recommending updates as appropriate to the City Librarian;
- (f) Ensuring training in compliance with this Policy is available and provided to appropriate staff and service providers; and
- (g) Investigating privacy complaints related to video surveillance records, and security/privacy breaches.

4. The Director of Transformational Projects, and the Director of Branch Operations and Customer Experience each have the authority to:

- (a) Conduct Security Video Surveillance Needs Assessments to determine requirement for a video surveillance system;
- (b) Advise on installations and operation of video surveillance systems;
- (c) Recommend proposed installations in accordance with this Policy, and in consultation with the appropriate Director(s). (see approval at Director's Committee);
- (d) Conduct periodic internal audits to ensure compliance with this Policy;
- (e) Delegate the day-to-day operations of video surveillance systems to managers, ensuring system-wide compliance with this Policy and TPL procedures; and
- (f) Ensure that appropriate Facilities and Branch staff are familiar with this Policy, and that training is provided by PPPM to all authorized personnel.

5. Authorized staff are responsible for:

- (a) Complying with and adhering to all aspects of this Policy;
- (b) Overseeing the day-to-day operation of video surveillance cameras, providing supervision to approved authorized personnel, and ensuring their compliance with all aspects of this Policy;
- (c) Ensuring all aspects of the video recording system are functioning properly;

- (d) Ensuring that training is provided to their staff via PPPM;
- (e) Ensuring that all the staff they supervise are familiar with this Policy;
- (f) Ensuring monitoring and recording devices, and all items related to surveillance are stored in a safe and secure location;
- (g) Forwarding all external requests for access to video records to the appropriate authorized staff member;
- (h) Documenting all information regarding the use, maintenance, and storage of records; including all instances of access to, and use of, recorded material to enable a proper audit trail;
- (i) Ensuring that access to video surveillance occurs within the rules established by the Security Video Surveillance Procedures;
- (j) Ensuring that no video surveillance imagery/records are disclosed without the approval of authorized management/in-charge staff;
- (k) Ensuring that no copies of data/images in any format (hard copy, electronic, etc.) are taken from the video recording system without approval from authorized management/in-charge staff ;
- (l) Informing appropriate shared facilities' personnel of this Policy's requirements;
- (m) Immediately reporting breaches of security/privacy to the City Librarian or designate; and
- (n) Forwarding all inquiries from the public about the use of video surveillance or about the Library's Security Video Surveillance Policy to PPPM.

Appendices

- Appendix 1: References
- Appendix 2: Definitions
- Appendix 3: Contacts

Appendix 1

References

Guidelines for Using Video Surveillance, Information and Privacy Commissioner of Ontario. 2015.

Municipal Freedom of Information and Protection of Privacy Act, R.R.O. 1990, c. M. 56 (MFIPPA).

Municipal Freedom of Information and Protection of Privacy Act, R.R.O. 1991, Regulation 372/91 as Amended.

Occupational Health and Safety Act, R.S.O. 1990, c.O.1.

Privacy and Video Surveillance in Mass Transit Systems: A Special Investigation Report – Privacy Investigation Report MC07-68, Information and Privacy Commissioner/Ontario, 2008.

Toronto Public Library Access to Information and Protection of Privacy Policy.

Toronto Transit Commission Video Recording Policy for Security Purposes. 2018.

Appendix 2

Definitions

Authorized staff: Employees of Toronto Public Library or of a Toronto Public Library contractor who are specifically authorized by the Library to operate the video surveillance system for a particular facility and to perform the duty, responsibility or action described in the Policy and in the Security Video Surveillance Procedures.

Video surveillance operation: Operation of the video surveillance system may include:

- a. Requesting access to video surveillance records
- b. Accessing/viewing/retrieving video surveillance records
- c. Disposing of video surveillance records
- d. Installing/maintaining video surveillance systems and infrastructure

Appendix 3

Contacts

Vickery Bowles, City Librarian, City Librarian's Office
Tel: 416-393-7092 Fax: 416-393-7083

Elizabeth Glass, Director, Policy, Planning and Performance Management Tel: 416-395-5602

Paul Trumphour, Director, Transformational Projects, Tel: 416-395-5541

Moe Hosseini-Ara, Director, Branch Operations and Customer Experience, Tel: 416-397-5944