

PROCEDURE TITLE	Procedure for CCTV Monitoring of City Premises
CATEGORY	Administrative
PROCEDURE NUMBER	ADMIN-016P2
RELATED LEGISLATION	ADMIN-016 CCTV Systems ADMIN-016P1 Procedure for Public Realm CCTV Systems ADMIN-016P3 Procedure for Traffic CCTV Systems
POLICY OWNER	City Clerk's Office - Access to Information and Privacy
ACCESS	Internal only

PROCEDURE STATEMENTS

1. Definitions

“**Applicant**” means the General Manager of the responsible department or his or her delegate;

“**CCTV Application**” means the form that must be completed and approved prior to installing cameras, also known as a CCTV privacy impact assessment, (PIA);

“**CCTV Application Amendment**” means the form that details changes to an approved CCTV Application that must be completed and approved prior to implementation of the changes;

“**CCTV system**” refers to any mechanical, electronic or digital system or device that: (i) enables continuous or periodic CCTV or video recording, observing or monitoring of individuals, assets and/or property; and (ii) is intended to be mounted or affixed to a structure, fixture or vehicle. For greater certainty, "CCTV system" includes devices such as enterphone systems, handheld license plate recognition systems and drones, but does not include cell phones with video capability, hand-held video recorders or video conferencing systems;

“**City Premises**” means any place of City operations;

“**FIPPA**” means the *Freedom of Information and Protection of Privacy Act* (British Columbia); and

“**Head**” means the City Manager, or the Director, Access to Information and Privacy, as designated under the *Freedom of Information and Protection of Privacy By-law* and Delegation by the Head of the City of Vancouver.

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2. Scope

This procedure is subject to the CCTV Systems Policy. It applies to all closed circuit television or other video systems (CCTV systems) set up to monitor City Premises, other than systems set up in the Public Realm as defined in the Procedure for Public Realm CCTV Systems or a Traffic CCTV System as defined in the Procedure for Traffic CCTV Systems.

3. Responsibilities

Responsibility for ensuring compliance with policies and procedures related to CCTV Monitoring Systems on City Premises is assigned to the General Manager, Real Estate and Facilities Management, or their delegate.

4. CCTV System Application

The CCTV Systems Application for City Premises will also serve as a Security Assessment for City Protective Services purposes and may require additional information for that purpose.

5. Process

To implement or expand a CCTV System on City Premises, the Applicant must:

- complete a CCTV Application, or CCTV Amendment Application, for City Premises in the form set by the Head;
- obtain a Security Assessment from the appropriate Security Manager within City Protective Services to ensure the site qualifies for cameras. The site must meet the minimum risk threshold prior to installation;
- obtain preliminary approval of the privacy impact assessment as included in the CCTV Application, or CCTV Amendment Application, from the Director, Access to Information and Privacy, (ATIP);
- submit the CCTV Application, or CCTV Amendment Application, with the preliminary approvals to the General Manager, or their delegate, responsible for the premises; and
- if approved, forward the CCTV Application, or the CCTV Amendment Application, to the Head for final approval.

Until the Head gives final approval, the Applicant must not take steps to purchase or implement the system or system expansion.

Security of Information

Information collected using a CCTV System must be kept secure as follows:

- a) Only the City employees or service providers authorized in the CCTV Application, or CCTV Amendment Application, may access or operate

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the CCTV System or access CCTV System recordings.

- b) Areas where the video feed from a CCTV System is monitored must, as far as possible, not be accessible to the public or unauthorized employees.
- c) Security arrangements must be in place to prevent unauthorized monitoring, interception or interference with transmissions from the CCTV System.
- d) Information stored on tapes or other removable storage devices must be dated, labeled and stored securely in a locked container located in a controlled access area. Information stored on a computer or server must be protected in accordance with the City's policies.
- e) Any agreement between the City and a service provider involving installation or operations of a CCTV System must state that any and all records created, dealt with or arising from, the delivery of a video monitoring program remain at all times under the City's control and subject to privacy legislation (*FIPPA*) and other applicable statutes.
- f) City employees and service providers responsible for the installation or operation of a CCTV System on City Premises must review and comply with the CCTV Systems Policy, this procedure and *FIPPA*.
- g) The installation manager is directly responsible for policy compliance and privacy legislation training for all installation contractors.

6. Public Notification

Except in the case of covert monitoring, the public must be notified of the existence, and possible operation, of video monitoring equipment. Clearly written signs must be prominently displayed at the entrances, on the exterior walls, and/or perimeter of the video monitoring areas, bearing the wording:

**“For Safety and Security Purposes
THIS AREA MAY BE UNDER VIDEO SURVEILLANCE
Questions? Contact the City's Access to
Information and Privacy Office via 3-1-1 (or 604-
873-7000) or 453 West 12th Avenue, Vancouver,
BC V5Y 1V4”**

Covert monitoring may only be authorized by the Head, in consultation with the Associate Director, City Protective Services and the Chief Human Resources Officer, where it is essential to the success of an investigation and the need outweighs the privacy interest of the individuals likely to be observed.

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REFERENCES

[Freedom of Information and Protection of Privacy Act](#)
[Freedom of Information and Protection of Privacy By-Law No. 11451](#)
[Records Management By-law No. 9067](#)

RELATED POLICIES AND PROCEDURES

ADMIN-009 ADMIN-029 ADMIN-016 ADMIN-016P1 ADMIN-016P3	Corporate Records and Information Management Policy Privacy Policy CCTV Systems Policy Procedure for Public Realm CCTV Systems Procedure for Traffic CCTV Systems
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APPROVAL HISTORY

Issued by:	City Manager's Office	APPROVED BY: City Clerk, Head, Freedom of Information and Protection of Privacy *	Date: March 26, 2015
		APPROVED BY: Director, Legal Services, Head, Freedom of Information and Protection of Privacy *	Date: April 6, 2015
		APPROVED BY: Deputy City Manager, Head, Freedom of Information and Protection of Privacy *	Date: April 6, 2015
REVIEWED AND AMENDED		APPROVED BY: City Manager	Amended: September 22, 2021

* Changes to the Freedom of Information and Protection of Privacy By-law in 2017 reduced the City's "Heads" from three to the City Manager.

Next review date **9/22/2023**