



Video Surveillance Policy

Board motion number: 2026-017

Date of next review: March 2030

Date Approved: March 25, 2026

Date of original motion: March 25, 2026

Policy type: Board

Board Chair's signature: _____

Purpose

The Orangeville Public Library is committed to maintaining a safe, secure, and welcoming environment for patrons, staff, volunteers, and visitors, while respecting individual privacy.

Video surveillance is used at selected Library locations as one component of the Library's overall approach to safety, security, and protection of people and property. It supports incident response, risk management, and the proper administration of Library operations.

This policy establishes how video surveillance is implemented and how information is collected, used, retained, accessed, and disclosed in accordance with the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and applicable guidelines from the Information and Privacy Commissioner of Ontario (IPC).

Scope

This policy applies to:

- All video surveillance systems located at Library facilities
- All video recordings created through those systems
- All staff, volunteers, contractors, and service providers involved in the operation or access of surveillance systems

This policy does not apply to:

- Audio or video recording of public programs
- Covert surveillance conducted by law enforcement

Policy

1. Authority and Accountability

- 1.1 The Library maintains custody and control of all video surveillance systems and related records.
- 1.2 The CEO or designate is responsible for:
 - a. Ensuring compliance with this policy
 - b. Authorizing access to and disclosure of video records
 - c. Approving the installation or relocation of cameras
 - d. Overseeing any privacy breach response

2. Collection and Use

- 2.1 Collection of personal information through video surveillance is authorized under MFIPPA where necessary for the proper administration of Library operations.
- 2.2 Video surveillance will only be used for legitimate purposes, including:
 - a. Safety and security of individuals
 - b. Protection of Library property and assets
 - c. Investigation of incidents
 - d. Risk management and insurance matters
 - e. Supporting the Library's legal interests
- 2.3 Video surveillance will not be used for routine employee performance monitoring.

3. Notice

- 3.1 Clear signage will be posted at Library entrances and in areas where video surveillance is in operation.
- 3.2 Signage will include:
 - a. Notification that video surveillance is in use
 - b. The legal authority for collection (MFIPPA)
 - c. The purpose of collection
 - d. Contact information for further inquiries

4. Camera Placement and Audio

- 4.1 Cameras will be installed only where reasonably necessary and appropriate.
- 4.2 Cameras will:
 - a. Not be placed in areas where there is a heightened expectation of privacy (e.g., washrooms)
 - b. Not be directed toward adjacent private property
- 4.3 Audio recording features will not be used. Any audio capability must be disabled.

5. Access and Disclosure

- 5.1 Access to video surveillance records is restricted to the CEO or designate and only for legitimate purposes.
- a. The CEO or designate must approve all access and disclosure
 - b. Access may be considered only as permitted or required by law, including:
 - Requests from law enforcement agencies in accordance with applicable legislation
 - Formal requests made under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) as part of the Freedom of Information process
 - Internal requests from authorized staff for safety, security, or incident-related purposes
 - c. All access requests must be documented and processed through the operating procedure and forms

6. Retention and Destruction

- 6.1 Video recordings will be retained only as long as necessary to meet operational and legal requirements.
- a. Routine footage will be retained for a limited period (typically up to 7 days) and then automatically overwritten
 - b. Footage required for investigation, claims, or legal matters may be retained longer, in accordance with applicable requirements
- 6.2 All records will be securely stored and destroyed in accordance with the Library's records management practices and applicable legislation.

7. Privacy Breach

- 7.1 Any suspected unauthorized access, use, disclosure, or loss of video surveillance records must be reported immediately to the CEO or designate.
- 7.2 The Library will respond to privacy breaches in accordance with MFIPPA and established privacy practices, including notification where required.

8. Roles and Responsibilities

- 8.1 Library Board
- a. Approves this policy
 - b. Provides governance oversight
- 8.2 CEO or designate
- a. Ensures policy compliance
 - b. Authorizes access and disclosure
 - c. Oversees implementation and breach response

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8.3 Town of Orangeville IT / Authorized Technical Support

- a. Supports system operation and security, as authorized

8.4 Managers and Supervisors

- a. Support implementation
- b. Report incidents or concerns

8.5 Employees

- a. Comply with this policy
- b. Report incidents or suspected privacy breaches