

Policy Name: Security Camera Policy
Policy Number: VNM-2025-01
Policy Adoption Date: October 14, 2025
Most Recent Amendment: N/A

Purpose

1. To establish a comprehensive and transparent framework for the effective management, governance, and operation of all video surveillance systems under the control of the Village.
2. This policy ensures the Village's use of video surveillance as a tool for enhancing public safety, asset protection and general law enforcement, while ensuring privacy compliance with the *Nova Scotia Freedom of Information and Protection of Privacy Act* (FOIPOP) and the *Municipal Government Act* (MGA).
3. To minimize privacy intrusion, deter crime, aid in investigations, and foster a secure environment for all employees and members of the public while upholding fundamental privacy rights.

Definitions

4. In this policy,
 - a. "Camera system" or "system" means security camera equipment, including cameras, monitors, and associated control and storage equipment that allow for remote viewing of images and/or audio captured within the field of vision of the cameras;
 - b. "Clerk Treasurer/ CAO" means the person employed by the Village as Clerk Treasurer under the MGA;
 - c. "contractor" means a corporate entity or an individual performing work on behalf of the Village under contract;
 - d. "Covert video surveillance" means the use of hidden or non-disclosed system(s) for law enforcement purposes, to respond to a specific threat to the safety and security of employees, members of the public, or Village property, or to assist with internal investigations;
 - e. "Digital recordings" means the images, data, and associated records created and retained as a result of the Village's use of a camera system;
 - f. "employee" means any person categorized as permanent, term, full-time, part-time, casual, contract, seasonal, temporary, or student worker in the employ of the Village, as well as volunteers;
 - g. "Internal investigation" means an investigation undertaken by the Village where alleged improper conduct by an employee has been identified, including actions or omissions that are in breach of policies, procedures, or work-related instructions;
 - h. "MGA" means Municipal Government Act;
 - i. "Personal information" has the same meaning as defined in Part XX of the MGA;
 - j. "secure" means to copy a portion of a digital recording to an external storage device such as a hard drive or flash drive;

- k. "FOIPOP" Freedom of Information and Protection of Privacy Act;
- l. "Village" means Village of New Minas; and
- m. "Village property" means any real property owned or leased, and operated directly by the Village, including buildings, parks, and recreational facilities.

Installation and Use of Surveillance Equipment

- 5. The video surveillance system may be justified based on significant safety concerns, asset protection, or verifiable and specific reports of crime or illegal activity.
- 6. This policy applies to all camera systems on Village property, except this policy does not apply to a camera system or other recording devices used by New Minas Fire Department as an autonomous incorporated organization or to the digital records produced by operation of such devices by New Minas Fire Department.
- 7. This policy does not apply to covert video surveillance.
- 8. Nothing in this policy limits the ability to develop and implement policies relating to the use of digital recordings for the management of employees.
- 9. The decision to install a camera system on Village property shall be made by the Clerk Treasurer/ CAO, or at the direction of the Village Commission.
- 10. When considering the installation of a camera system on Village property, the following criteria shall be considered by the Clerk Treasurer/ CAO or delegate:
 - a. the existence of demonstrated security concerns at the location, or at similar locations to the location, where placement of a camera system is being proposed;
 - b. what measures, other than the installation of a camera system, are available to address identified safety or security concerns;
 - c. whether measures other than the installation of a camera system would be effective in addressing the identified safety or security concerns;
 - d. the effect that the proposed placement of a camera system may have on personal privacy, and the ways in which privacy intrusion can be minimized;
 - e. the operational requirements of the Village; and
 - f. any other criteria deemed relevant by the Clerk Treasurer/ CAO.
- 11. Where circumstances require the immediate installation of a camera system, the criteria in section 10 shall be reviewed as soon after installation as is practicable and adjustments, up to and including removal, will be made if required in respect of the installation once the review is complete.
- 12. A camera system may operate at any time in a twenty-four-hour period.

13. The Village recognizes the need for synergies between an individual's right to privacy and the Village's duty to promote and maintain safe and secure environments and protect property.

Collection

14. The main purpose of the video surveillance system is to aid in the safety and security of employees, members of the public, and Village property. Information collected shall only be used for a consistent purpose to its collection as unauthorized under FOIPOP.
15. The Clerk Treasurer/ CAO or designate shall maintain an inventory of all camera systems under the control of the Village.
16. The monitoring procedures shall be performed based on the following principles:
 - Video surveillance monitoring shall be conducted in accordance with all applicable statutes and regulations;
 - The video surveillance system shall not monitor individuals in any manner, which would constitute a violation of the Human Rights Code;
 - Video surveillance monitoring shall be conducted in a professional and legal manner;
 - As required under FOIPOP, a notice of collection of Personal Information must be placed in all locations where video surveillance systems are in place and these areas shall have signage advising the public of the monitoring and recording;
 - Information obtained through the video surveillance system shall be used for purposes allowed under FOIPOP, such as security, safety, investigations, claims against the Village, or for law enforcement purposes;
 - Information obtained through the video surveillance system shall only be released in accordance with the standards set by FOIPOP and the recordings shall be handled in a manner that provides continued security of the recorded information; and
 - The cameras will be located in plain sight within the Village, and the cameras will be restricted to prohibit viewing inside private residences.
 - To the extent possible, video displays of digital recordings should not be located such that the public or unauthorized staff may view the images.

Notification

17. To ensure transparency and allow individuals to make informed decisions about entering a monitored area, the Village will provide clear and prominent public notice of all video surveillance systems.
18. Where a camera system is permanently installed on Village property, the Clerk Treasurer/ CAO shall order the posting of signage in a conspicuous place in proximity to the system,

advising that the area is monitored by a camera system and the authority for doing so.

19. Notwithstanding (18), if a sign cannot physically be posted in a conspicuous place in proximity to the system, it shall be posted in the general vicinity.
20. Where a number of camera systems are placed in a location, it shall be sufficient to display a single sign in a conspicuous place at or near the entry point advising those entering the location that it is being monitored by a camera system.
21. A camera system shall not be installed in areas where employees or members of the public have a higher expectation of privacy, including within a washroom or change room.
22. A camera system shall, to the extent possible, be focused on the location identified as having safety or security concerns, and the ability to adjust or manipulate the camera system to focus on spaces not intended to be monitored shall, to the extent possible, be restricted.

Usage

23. Personal information collected via video surveillance will only be used for the purpose for which it was originally collected. Any secondary use of the information will be carefully evaluated for authority under FOIPOP or the MGA.
24. Digital recordings obtained through a camera system may be used by the Village to:
 - a. enhance the safety and security of employees, contractors and members of the public who are on Village property;
 - b. safeguard Village property and other assets;
 - c. detect and deter criminal activity by providing law enforcement agencies with evidence related to possible unlawful activities;
 - d. manage risk to the Village, including workplace accidents and/or injuries, incidents, complaints, claims, or potential claims involving the Village; and
 - e. undertake internal investigations, as authorized by the Clerk Treasurer/ CAO.
25. The Clerk Treasurer/ CAO may secure digital recordings from an identified time and location for any of the purposes set out in (24).

Disclosure

26. Disclosure of video recordings to third parties is a sensitive matter and will be strictly

controlled. Disclosure will only be made in accordance with the FOIPOP and MGA. The policy specifies the process for all disclosures.

- **Verification of Authority:** Before any disclosure, the Village will verify the legal authority for the request and ensure it complies with the FOIPOP. A designated individual or position, such as the Clerk Treasurer/CAO, is authorized to disclose data.
- **Privacy Protection:** When a recording is disclosed, all personal information of individuals not relevant to the disclosure will be redacted or obscured to the greatest extent possible to protect their privacy rights. This includes blurring faces, license plates, or other identifying details.
- **Documentation:** All disclosures will be fully documented, including a copy of the formal request, the authorization to disclose, a log of the information disclosed, and a clear identification of the authority for such disclosure.

Security

27. The Village is responsible for protecting the video surveillance system and all collected data from unauthorized access, use, disclosure, or destruction using reasonable security arrangements. Security measures fall into four categories:

- a) **Administrative Security:** In the event of an unauthorized disclosure of video footage or a security breach, a clear protocol will be followed to mitigate the situation. Any employee who discovers a breach must immediately report it to the Clerk Treasurer/CAO. The scope of such breach/disclosure will be assessed and immediate steps taken, such as changing passwords and revoking access, to prevent further unauthorized access. The Clerk Treasurer/CAO will notify affected individuals as required and will cooperate with the Access & Privacy Officer in the resolution of such unauthorized access.
- b) **Physical Security:** All recording equipment, including cameras, cables, servers, and storage media shall be housed in a physically secure, locked location with controlled access. Monitors will be installed in a secure area and viewable only by authorized employees.
- c) **Technical Security:** The system will be protected by strong passwords and robust access controls. User access will be limited to authorized personnel only. All wireless transmissions of digital recordings and data shall be encrypted to the greatest extent possible, and regular security updates and patches will be applied.

- d) **Personnel Security:** The Clerk Treasurer shall designate by position the persons authorized to operate the system and view the data. These individuals will receive regular and ongoing training to ensure they understand their obligations under privacy law and this policy.

Retention and Disposal of Digital Recordings

28. The Village may develop retention periods for digital recordings, including the length of time such recordings are to be maintained, and the Clerk Treasurer/ CAO may develop different retention periods for those digital recordings that have been secured pursuant to (25).
29. Digital recordings that have been secured in response to a request pursuant to (33) shall be retained in accordance with the legal and records management requirements of the request.
30. Notwithstanding (29), where digital recordings that have been secured in response to a request pursuant to (25) are subsequently used to make a decision that directly affects an individual, they shall be retained for a minimum of one year.
31. Digital recordings for which no request to secure has been received by the Clerk Treasurer/ CAO shall not be retained for longer than 28 days. A camera system may record over such existing recordings.
32. Secured digital recordings shall be disposed of in a manner that ensures that personal information is erased and cannot be retrieved or reconstructed.

Access to Information Requests

33. The Village recognizes the right of individuals to access their own personal information under the FOIPOP Act and MGA. The policy will describe the procedure for responding to such requests, including how third-party images will be protected.
- a. **Formal Request:** All requests for access to digital recordings shall be made in the following manner:
- i. an application pursuant to MGA Part XX;
 - ii. as part of a legal action against the Village; or
 - iii. by way of a court order or otherwise as provided for by law.

The request should be as specific as possible, including the date, time, and location of the incident, to facilitate the search for the relevant footage.

- b. **Processing of Requests:** Upon receiving a request, the Clerk Treasurer/ CAO or designate will:
- i. Locate the footage (if it has not been destroyed).
 - ii. Review the footage to identify the requester and any other individuals.
 - iii. Redact or obscure the faces and other identifying information of all third parties who are not the subject of the request, to protect their privacy.
 - iv. Provide the requester with access to the footage in a format that protects the privacy of others.

Third-party Access to Digital Recordings

- 34. Law enforcement personnel may request access to digital recordings for law enforcement or investigative reasons by contacting the Clerk Treasurer/ CAO.
- 35. A third party who is given access to digital recordings may be required to acknowledge his or her duties, obligations, and responsibilities with respect to the confidentiality, use, and disclosure of the digital recordings in writing.
- 36. Any unauthorized access to digital recordings or camera system shall be reported to the Access & Privacy Officer for investigation.
- 37. Any employee who provides digital recordings to unauthorized parties, either as a result of intentional wrongful disclosure or disclosure caused by negligence, may be subject to disciplinary action, up to and including dismissal.
- 38. Any contractor who provides digital recordings to unauthorized parties, either as a result of intentional wrongful disclosure or disclosure caused by negligence, may be subject to termination of their contract or legal action.