



Security Video Surveillance Policy

Policy Owner: Community Safety Unit

Approval: Board of Directors

First Approved: September 2009

Effective Date: October 2024

Policy Statement

This policy pertains to Toronto Community Housing's (TCHC) usage of security video surveillance, as a component of its community and workplace safety and security strategy. This policy does not apply to the installation of authorized third-party surveillance by law enforcement agencies.

TCHC recognizes the need to balance an individual's privacy interest and the need to ensure the safety and security of TCHC's staff, tenants, residents, visitors, guests, as well as the property TCHC operates, occupies, owns, and leases.

This policy has been developed to govern the usage of security video surveillance, and to provide information related to:

- The circumstances in which TCHC may install and use security video surveillance;
- Staff roles and responsibilities to ensure compliance and accountability with the policy and associated procedures
- The collection, access, use, disclosure, retention, disposal, and destruction of video surveillance records; and,
- The mechanisms TCHC will employ, when monitoring compliance and reviewing the policy.

While security video surveillance systems need to be installed for legitimate purposes, they must also be designed to minimize unnecessary privacy intrusions. Proper video surveillance, when necessary, is one of the most effective means of helping TCHC operate in a safe, secure, and privacy



protective manner. This policy has been developed in accordance with the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and the *Ontario Human Rights Code*.

Scope

This policy applies to all types of security video surveillance systems, including license plate readers, surveillance monitors and camera recording devices that are used on TCHC property.

This policy does not apply to:

- Video surveillance systems operated or maintained by third parties, including tenants of TCHC and owners of properties, equipment or other assets adjacent to TCHC property;
- Third-party cameras, recording devices, and systems installed by third-party law enforcement agencies for investigation purposes;
- Surveillance systems required by law, including systems required under a court order.

Definitions

Camera – refers to a device used to convert/capture images or video footage for transmission, viewing, recording, or digital storage.

Real time monitoring – refers to the use of video surveillance in which the events captured by a camera are simultaneously monitored as they occur.

Security video surveillance systems – refers to visible and non-visible¹ cameras and other recording devices or equipment which enables continuous or periodic recording, observation or monitoring of property and/or individuals, used for the purposes as set out in this policy (commonly referred to at Toronto Community Housing as CCTV).

Security video surveillance records – refers to information collected through video surveillance.

¹ Non-visible cameras may be installed in areas where there is a high risk of vandalism to cameras. Signage will be posted to notify the public that the area is subject to video surveillance.



Surveillance monitors – refers to video monitors used to permit viewing of images or video footage captured by cameras and other recording devices.

Third-party surveillance- refers to surveillance carried out by law enforcement agencies through the installation of cameras on TCHC property. The process of facilitating law enforcement agencies to engage in court authorized third-party surveillance is governed by the Community Safety Unit's Standard Operating Procedure "10-02 - Third-party surveillance"

Toronto Community Housing (TCHC) assets – refers to property and or equipment operated, owned, or leased by TCHC.

Toronto Community Housing (TCHC) property – refers to property that is operated, owned, or leased by TCHC.

Vendor – refers to a person or entity carrying on the business of providing deliverables to TCHC.

Objectives of Security Video Surveillance

TCHC uses security video surveillance to assist in meeting the following objectives:

- Supporting community safety and well-being for TCHC staff, tenants, guests and visitors;
- Supporting risk management purposes;
- Detering, detecting, and investigating unlawful activity and/or conduct that is in violation of TCHC policies; and,
- Protecting the security of TCHC assets, including helping to defend its legal rights and respond to claims advanced against it by others.

The use of security video surveillance systems is one measure which will be used to assist with these objectives.

Policy Details



Permitted Uses and Disclosure

Security video surveillance records will normally be used exclusively for the objectives identified above, and as otherwise permitted by MFIPPA. Security video surveillance records will not be disclosed except as set out in this policy and/or as permitted/required by MFIPPA.

A security video surveillance system will not be used for any evaluation of employee job performance, nor will it be used to monitor attendance.

Notwithstanding anything in this policy, TCHC may use security video surveillance records to investigate employee conduct that is alleged to be illegal or in breach of TCHC's Code of Conduct or any other policy or procedure governing staff conduct.

Installation

TCHC may install security video surveillance systems when it identifies an operational need to do so to achieve the objectives that are included in this policy. TCHC will establish procedures that support this policy and that detail the process through which it identifies the operational need to install security video surveillance systems and the considerations that it applies in determining that such an installation is required in order to achieve the objectives set out in this policy.

Signage

All areas under security video surveillance governed by this policy will be posted with signage advising the area is subject to video surveillance and the legal authority for the collection. Signage will include other content necessary to meet MFIPPA notice requirements. (See Appendix A).

Recording and Real Time Monitoring

Camera images may be recorded for review and/or monitored in real time. Camera images may be monitored in real time only in limited circumstances where it can be clearly established that recording for subsequent review is not adequate to assist with achieving the objectives of the policy and where privacy intrusion is minimal relative to the established need for real time monitoring. Real time monitoring will not be used for the routine evaluation



of employee job performance, nor will it be used to monitor employee attendance.

Related Procedures

TCHC shall establish procedures governing:

- disclosure, access, and use of security video surveillance systems, surveillance monitors, cameras, and security video surveillance records;
- the manner in which it will determine when a TCHC employee requires access to such equipment and records in order to carry out their duties, to implement this policy, and/or to meet a legislated or legal requirement;
- the manner in which it will determine when employees of Toronto Seniors Housing Corporation are to be provided access to and disclosure of security video surveillance records:
 - in order to carry out their duties; or
 - pursuant to applicable agreements between the two organizations;in accordance with applicable privacy legislation and regulations, including *MFIPPA*; and
- the manner in which it will permit access to security video surveillance records in response to access requests from third parties to ensure compliance regarding disclosure under this policy and *MFIPPA*.

Retention of Records

Retention periods for, and disposal of, security video surveillance records will comply with *MFIPPA* requirements and will be in accordance with TCHC's Records Management Policy.

Roles and Responsibilities

TCHC will establish procedures clearly outlining roles and responsibilities for the administration of this policy.



Compliance and Monitoring

All TCHC staff must follow this policy and the privacy requirements of *MFIPPA*, including but not limited to the prohibition to access, disclose, alter, or use security video surveillance systems, its components, equipment, files, databases, or records for personal reasons and/or without proper authorization. This includes taking all reasonable steps to ensure surveillance monitors and security video surveillance records are not used, accessed, or disclosed contrary to this policy or *MFIPPA*.

Failure to follow this policy, including intentional wrongful disclosure or disclosure caused by negligence, may result in discipline, up to and including termination in accordance with the TCHC Code of Conduct or any other corporate policies or procedures which govern the retention or release of corporate records.

Should TCHC contract with a vendor to provide services related to a video surveillance system, TCHC will inform the vendor that all security video surveillance systems and security video surveillance records must be handled according to this policy and *MFIPPA*.

TCHC may also require the employees of the vendor to sign a non-disclosure agreement. Failure to follow this policy, including intentional wrongful disclosure or disclosure caused by negligence, may result in termination of the vendor's contract.

Any non-compliance of this policy and the associated procedure will be reported to the Senior Director, Community Safety Unit and the Chief Operating Officer.

Inquiries from the Public

Staff receiving an inquiry from the public regarding this policy will direct the inquiry to the Senior Director, Community Safety Unit or their designate at CSU-GeneralInquiries@torontohousing.ca. Requests related to release of information will be directed to the TCHC Freedom of Information Office (FOI) at FOI@torontohousing.ca for following the "Make a freedom of information request" process found on TCHC's corporate website.

Privacy Breach



TCHC will take actions appropriate in the circumstances to address a reported privacy breach related to personal information collected, used or disclosed pursuant to this policy, including, where deemed appropriate, those actions recommended in any guidelines issued by the Office of the Information and Privacy Commissioner.

Governing and Applicable Legislation

- [Municipal Freedom of Information and Protection of Privacy Act](#)
- [Ontario Human Rights Code](#)
- [Information and Privacy Commissioner of Ontario “Guidelines for the Use of Video Surveillance”](#)

Related Policies and Procedures

- Code of Conduct Policy
- Records Management Policy
- Security Video Surveillance Procedure
- Appendix A: Sample Signage Consent
- CSU SOP #10-01 Overt Security Video Surveillance
- CSU SOP #10-02 Third-party surveillance

Commencement and Review

Revision	Date	Description of changes	Approval
First approval:	Sept 2009	New	Board of Directors
Revised	October 2024	This policy has been updated to reflect technology updates, operational changes and governance framework. This policy replaces TCHCs “CCTV Policy”	Board of Directors

Next Scheduled Review Date: October 2027



Appendix A – Sample Signage Content

This page contains a picture of the authorized TCHC Video Surveillance signage in place at TCHC properties and states in the 12” (Height) by 18” (Width) dimensions;

“Video Surveillance

Attention: These premises are subject to video surveillance by Closed Circuit Television (CCTV) and License Plate Recognition Cameras. This is not an emergency response system. Call 911 in case of emergency.

Section 28(2) of the Ontario Municipal Freedom of Information and Privacy Protection Act authorizes the collection of personal information by use of CCTV. This information will be used for the purpose of promoting community and building safety.

Any questions about this collection may be direct to Toronto Community Housing’s Client Care Center, 931 Yonge Street, Toronto Ontario M4W 2H2.



Telephone: 416-981-5500,

Email: cctv@torontohousing.ca

12"

18"

Toronto Community Housing

Video Surveillance

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This signage contains the same content as stated above but with the following signage dimensions 24"(Heights) by 30"(Width).



24"

30"

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