


Policy Name:	CLOSED CIRCUIT VIDEO CAMERA	
Approved By:	Board of Governors	
Approval Date:	April 11, 2025	
Next Scheduled Renewal Date:	2026 or As Required	
Policy Holder:	VP, Corporate Services & CFO	
Operational Lead:	Director, Facilities and Security Services	
Policy Number:	FAC-010	

## CLOSED CIRCUIT VIDEO CAMERA POLICY

### 1.00 PURPOSE

- 1.1 Coast Mountain College (CMTN) uses video camera technology to enhance the safety and security of those who work and learn at the College and visit our campuses, and to protect CMTN’s assets and property. CMTN is committed to using this technology in a way that respects and safeguards the privacy of members of the College Community.
- 1.2 This policy and its accompanying procedure (FAC-010P, *Closed Circuit Video Camera Procedure*) are intended to ensure that CCVC systems (camera systems) that are operated by CMTN, and are configured to capture identifiable images of individuals, are implemented and used in compliance with the BC [Freedom of Information and Protection of Privacy Act](#) (FOIPPA), other provincial legislation, College records management requirements, and privacy impact assessments (PIAs).
- 1.3 Information obtained through the system will be used exclusively for safety, security, and legal enforcement purposes, which must relate to the protection of the College Community and property, including protection from theft, vandalism, or other property damage.

### 2.00 DEFINITIONS

In this policy, these terms have the following meanings:

- 2.1 **CIO:** Chief Information Officer.
- 2.2 **CCVC Audit:** An audit of the CCVC system conducted by CMTN.
- 2.3 **CCVC Maintenance:** The CMTN administrator or other designated person responsible for a coordinating role in the installation, maintenance, and awareness of camera systems at their location.
- 2.4 **CCVC Data:** Visual information captured using the camera systems. The CCVC cameras do not capture audio information.
- 2.5 **CCVC System:** A closed system consisting of video cameras, display devices (monitors), and wired or wireless data networks that allow images to be transferred from video cameras to monitors.

- 2.6 **Closed Circuit Video Camera (CCVC):** Any camera installation used in the CCVC system.
- 2.7 **College Community:** All CMTN employees, students, and board members, and any other person who is contractually obligated to comply with College policy; for the purposes of this policy, includes employees of the CMTN Students' Union.
- 2.8 **Director:** Director, Facilities and Security Services.
- 2.9 **Privacy Officer.** The senior official designated to investigate disclosures of security breaches.

### 3.00 SCOPE

- 3.1 This policy governs all CMTN-operated camera systems that are configured to capture identifiable images of individuals when these systems are used at premises owned, leased, rented, or controlled by CMTN.
- 3.2 This policy applies to all members of the College Community.
- 3.3 This policy does not apply to any of the following:
  - a. videoconferencing or other communications systems
  - b. technical support of information technology
  - c. audiovisual and other systems
  - d. academic instruction systems
  - e. research projects that have received ethics approval
  - f. exam invigilation systems used by the Accessibility Coordinators
  - g. circumstances where all individuals whose images may be captured have provided their informed consent.

### 4.00 RESPONSIBILITIES

- 4.1 The Director is responsible for ensuring that all of the following occur:
  - a. CMTN facilities are operated safely
  - b. the campus has adequate resources to operate and maintain a CCVC system
  - c. the CCVC system complies with BC's [Freedom of Information and Protection of Privacy Act](#) (FOIPPA)
- 4.2 The Director may delegate specific duties regarding the operation and maintenance of the system.
- 4.3 The Director is responsible for all of the following:
  - a. overseeing and coordinating the CCVC system at CMTN to ensure consistent and standard application across the campuses
  - b. ensuring written procedures are in place
  - c. ensuring that the use and security of CCVC system equipment is subject to annual audits and regular maintenance and that deficiencies or concerns identified by the audit are addressed
  - d. reviewing and evaluating the CCVC system, at least once every calendar year, to ascertain whether it is still required in accordance with the procedures.

- e. conducting an audit every three years of the CCVC system for compliance with FOIPPA
- f. providing information in response to requests for access to personal information made under FOIPPA.

5.00 COMPLIANCE WITH FOIPPA

- 5.1 Any breaches of this policy may be subject to disciplinary or other actions and may also constitute a breach of FOIPPA or other legislation.
- 5.2 CMTN may use the CCVC system to monitor and/or record activities within CMTN-owned or occupied locations to perform one or more of the following activities:
  - a. assist in the protection of individuals, assets, and property
  - b. assist in the investigation of reported criminal activity, injury, property loss and security violations
  - c. assist in the investigation of violations of CMTN policies related to safety that result in serious injury or death
  - d. comply with other purposes permitted under FOIPPA and other applicable laws.

6.00 LIMITATIONS OF CAMERA SYSTEMS

- 6.1 The CCVC system is one part of the College's security program, used in its continuing efforts to enhance campus safety and security – nevertheless, the presence of camera systems on any of its campuses is not a guarantee of safety for persons or property.

7.00 NOTIFICATION TO PUBLIC

- 7.1 CMTN must post a public notification around campus providing all of the following:
  - a. the purpose(s) for the use of its camera systems
  - b. the legal authority for the collection of information using its camera systems
  - c. the title of the College employee who can answer questions about the collection of information.

8.00 CAMERA SYSTEMS USAGE

- 8.1 Except as otherwise permitted under FOIPPA, CMTN strives to ensure that its use of the CCVC system is subject to all of the following conditions:
  - a. other means for achieving the same objectives are substantially less effective than using cameras
  - b. the benefits of using cameras substantially outweigh any privacy intrusion
  - c. the cameras have been configured to collect the minimum amount of personally identifiable information necessary to achieve the purpose of the collection.
- 8.2 CMTN will use and disclose footage obtained through the camera system only as authorized by FOIPPA, including to address and investigate incidents and to make appropriate reports to law enforcement authorities.

8.3 Cameras of the CCVC system are not intended to be used to monitor employees for the purposes of performance management or students for the purposes of detecting academic misconduct.

8.4 The cameras of the CCVC system must not be hidden or disguised. Signage must also be displayed at the perimeter of surveillance areas so that individuals have reasonable warning before entering a monitored area.

#### 9.00 CMTN CCVC CONTACT PERSON

9.1 The CIO is responsible for the secure operation of the CCVC camera system and the secure storage of recorded CCVC system data, in accordance with related CMTN policies.

#### 10.00 ACCESS TO FOOTAGE

10.1 Video recordings of the CCVC system may be accessed only by the Director or a CCVC Operator when authorized by the Vice-President, Corporate Services & CFO to access or maintain these systems.

10.2 Monitors used to review CCVC camera recordings will be located in a secure area that is restricted to authorized persons. When not in use or being reviewed, camera images must not be accessible or viewable by non-authorized persons.

10.3 Video recording and review will be conducted in a professional, ethical, and legal manner. Personnel involved in video recording and review will be appropriately trained and supervised in the responsible use of this technology.

10.4 Violation of the procedures for video recording and review will result in disciplinary action appropriate to the violation.

10.5 Under the BC [Freedom of Information and Protection of Privacy Act](#), any student, employee, service provider or visitor who has been recorded by a CCVC camera has a right of access to his or her personal information provided it is still available.

#### 11.00 COMPLAINTS

11.1 Complaints regarding CCVC system use at CMTN will be handled according to the procedures associated with this policy (FAC-010P, *Closed Circuit Video Camera Procedure*).

#### 12.00 PRIVACY BREACHES

12.1 Unauthorized access to, collection, use of, disclosure, or disposal of personal information is a privacy breach. The College will respond promptly and effectively to minimize the impact of breaches upon the persons whose information may have been compromised and to limit damage to CMTN and its reputation.

12.2 Guidance for responding to privacy breaches is provided by BC's Office of the Information and Privacy Commissioner through the Director and the Privacy Officer.

a. Specific procedures for responding to privacy breaches are contained in FAC-010P, *Closed Circuit Video Camera Procedure*.

12.3 All potential privacy breaches must be reported to the Vice-President of Corporate Services & CFO, the Director, and the Privacy Officer.

13.00 RELATED POLICIES AND PROCEDURES

13.1 FAC-010P, *Closed Circuit Video Camera Procedure*

14.00 OTHER SUPPORTING DOCUMENTS

14.1 [Accountable Privacy Management in BC's Public Sector](#)

14.2 [BC Freedom of Information and Protection of Privacy Act](#) [RSBC 1996], c. 165

14.3 [BC Privacy Management Program Direction](#)

14.4 [BC Privacy Impact Assessments](#)

15.00 HISTORY

<b>Created/Revised/ Reviewed</b>	<b>Date</b>	<b>Author's Name and Role</b>	<b>Approved By</b>
Created	Apr. 11, 2025	Director Facilities and Security Services	Board of Governors