

AV2200 – Management and Use of Recorded Closed Circuit Video Systems (CCTV)

1.0 PURPOSE

To provide a framework for the use and administration of the security based Closed Circuit Television systems and the retention and distribution of its recorded data.

2.0 DEFINITIONS

TERM	DEFINITION
Closed Circuit Television(CCTV)	A surveillance system that comprises cameras, recorders and displays for monitoring activities while on or within Interior Health property.
Digital Video Recorder (DVR)	A piece of hardware used to record and store the data captured via the cameras as part of the CCTV system. The DVR is used to capture signals from an analogue based system.
Freedom of Information and Protection of Privacy Act (FIPPA) or the Act	The formal government legislation that regulates the recording, storage and distribution of all personal records within public institutions including all facilities within Interior Health (IH). This includes all CCTV video recordings within IH.
Network Video Recorder (NVR)	A software program that records video in a digital format to a disk drive, USB flash drive, SD memory card or other mass storage device. It does not contain any dedicated video capture hardware. The programs are typically used in an IP (Internet Protocol) based system.

3.0 POLICY

3.1 Designated Responsibilities

The Manager Protection, Parking and Fleet Services (PP&FS) is responsible for ensuring that Interior Health's (IH) creation and use of video records complies with the Act. The Manager is also responsible for the security, collection, use, and retention of video records to comply with the provisions of the Act.

3.2 Storage & Disposal of Video Records

All video records will be retained for a period of 30 days. All video records created by video surveillance technology will be routinely and permanently erased by ensuring video recording devices store all video images in a circular recording mode (i.e. continually recording new images over the oldest stored images).

Video records are stored locally on the site they were recorded. These records are stored on either a Digital Video Recorder (DVR) or a Network Video Recorder (NVR).

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3.2.1 Storage and Disposal of Video records required for investigation

If deemed to have evidentiary, investigative or necessary operational use by the Manager (PP&FS) or designate, special media video records retained by Protection Services that have been transferred to a physical medium such as a PC, Compact Disk (CD) or portable USB storage device will be stored in a secured locked cabinet or room when not in use. In addition, PP&FS personnel must securely and permanently dispose of special media video records when retention of such records is no longer deemed necessary for evidentiary or investigative purposes. Any records created by video surveillance technology containing information to be used in a criminal, civil or internal investigation will be sealed and delivered to the Manager PP&FS or designate. IH will retain and store video records that are required for evidentiary purposes according to the standard procedures until they are required by law enforcement or civil authorities.

3.3 Release of Video Records to Law Enforcement or Civil Authorities

All requests for release of records created by video surveillance technology to law enforcement or other civil authorities will be forwarded to the Leader, Freedom of Information or designate for direction. If a decision is made to release any record created by video surveillance technology, a copy of the record will be maintained by the Interior Health Protection, Parking and Fleet Services Department.

3.4 Release of Video Records to Other Parties

All requests for release of records created by video surveillance technology to individuals or organizations not captured in 3.3 will be forwarded to the Leader, Policy Development and Freedom of Information for direction. If a decision is made to release any record created by video surveillance technology, a copy of the record will be maintained by the IH Protection, Parking and Fleet Services Department.

3.5 Notification

In order to meet notification requirements of Section 27(2) of the Act, the following wording is to be used for IH video surveillance signage that will be prominently posted at IH sites where recorded video surveillance is deployed: "*These premises are monitored by video surveillance. For Information call 250-491-6326*". Please see example in Appendix A.

3.6 Confidentiality of Patient Treatment

As per Section 27 of the Act, no video records of areas in which confidential patient treatment is administered will be created, unless approval from the Manager, Protection Parking and Fleet Services in conjunction with the Director, Risk Management and Director, Information Privacy and Security has been received; also that the creation of

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such records relates directly to, and is necessary for, such treatment. However, unrecorded video surveillance of confidential patient treatment is permitted in order to augment staff and client safety. As no records of such video surveillance are created, guidelines contained herein do not pertain to unrecorded video surveillance.

3.7 Exceptions to Requirement of Notification

Although Section 27(2) sets out requirements to notify individuals of the collection of personal information (i.e. video records), there are instances where notification would defeat the purpose for which the information is being collected (e.g., covert surveillance for the purposes of investigation of criminal activities). The only exceptions to the requirement set out under Section 27(2) to notify individuals of the presence and purpose of a video surveillance system are noted in Section 27(3) of the Act. It is the responsibility of the Manager Protection Parking and Fleet Services to ensure any exception of notification.

3.8 Monitoring Of Video Surveillance Systems

Within IH, there is no constant monitoring of any video surveillance system. On occasion, there may be a requirement to monitor certain cameras in certain situations. These cameras will be monitored by either PP&FS personnel or Contracted Security Services employees. All persons contracted to Protection Services for the purposes of CCTV monitoring, maintenance, and installation are required to sign a confidentially agreement.

4.0 PROCEDURES

4.1 Implementing Video Surveillance Systems

Prior to any IH department and/or site implementing a video surveillance system a Security Assessment must be conducted to ensure that security requirements are met in the least intrusive manner possible and that all equipment specified can be fully integrated with current technology. Any IH department and/or site intending to implement a video surveillance system will contact Protection Services to request such a Security Assessment. The decision on whether a video surveillance system is appropriate for the security requirements of the requesting IH department is subject to the approval of the Manager PP&FS or designate, and will be based on the findings of the requested Security Assessment.

4.2 Camera Location, Operation and Control

Prior to installation of any recorded CCTV system, Protection Services will ensure that the location, operation and control of any video surveillance system meet IH security requirements and standards. Access to the operation and control of any video surveillance system will be restricted to designated staff only. Access to video records will be password protected.

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4.3 Process to Release Video to Law Enforcement or Other Civil Agencies

All requests for the release of video footage must first obtain approval from the Leader, Freedom of Information or designate. Direction on the retrieval of the requested footage will then be given by the Manager Protection, Parking and Fleet Services or designate and must follow the below steps:

1. Ensure the reason for the request meets the requirements within *The Act* and complies with IH Policy AF0500. The request must be used for a lawful investigation, or is in the best interest of public safety. The request cannot be a “fishing” expedition.
2. Have the requesting agency fill out and sign the Client Information Request form <http://inet.interiorhealth.ca/infoResources/forms/Documents/807324.pdf>
3. After receiving approval, work with the requesting agency to ensure the appropriate medium is used to transfer the file. Files must be encrypted or transferred to an encrypted hard drive or USB Drive.
4. Record all the relevant information and create a report in the Site Secure incident reporting system.

5.0 REFERENCES

- [Freedom of Information and Protection of Privacy Act \[RSBC 1996\] CHAPTER 165](#)
- [Interior Health Policy AF0500 - POLICE DESIGNATED/DELEGATED AUTHORITY ACCESS TO CLIENTS AND CLIENT INFORMATION](#)
- [Interior Health Policy PSS0100 – Electronic Security Systems](#)

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Appendix A – Notification Sign



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