

Original Approval Date: October 29, 2019

Parent Policy: [Lands and Building Security Policy](#)

Video Monitoring Procedure

Office of Administrative Responsibility:	University of Alberta Protective Services
Approver:	Associate Vice-President, Risk Management Services
Scope:	Compliance with this University procedure extends to all academic, support and excluded staff, postdoctoral fellows, and academic colleagues as outlined and defined in the Recruitment Policy (Appendix A and Appendix B: Definitions and Categories); undergraduate, graduate and Faculty of Extension students; emeriti; members of the Board of Governors; visitors to campus, including visiting speakers and scholars; third party contractors; and volunteers.

Overview

The University of Alberta (“University”) uses **video monitoring** as a means of enhancing the safety and security of individuals and protecting and managing its property.

This procedure does not apply to video monitoring by:

- financial institutions monitoring their ATMs on **University property**
- third parties leasing or renting space within University property (e.g. HUB mall merchants, students living in residences)
- attendees of public performances or events taking place on University property
- **student groups** as it relates to their events approved under the *Student Groups Procedure*
- members of the academic community as part of their teaching or research (members of the academic community who use video monitoring for teaching or research must request approval from Facilities and Operations in advance if the equipment is to be attached or affixed to University building infrastructure such as walls, ceilings, etc.)
- by the University or third parties in other analogous circumstances.

The procedure does not apply to **public live streaming** unless it is for the purpose of enhancing the safety and security of individuals and protecting and managing University property.

This procedure does not apply to the use of surveillance where there are reasonable grounds to believe that an individual is engaged in unlawful conduct. Requests for such uses must be made to, and approved by, the Director of University of Alberta Protective Services (UAPS).

Purpose

The purpose of this procedure is to:

- state the principles that guide the University's use of video monitoring on its property
- outline the University's uses of video monitoring on its property
- ensure sufficient public notice and signage of video monitoring on University property
- detail the steps to request approval for video monitoring on University property
- address the requirements to collect, access, use, disclose, secure, store, retain and destroy the images transmitted or recorded by video monitoring
- outline the education for **authorized persons** with video monitoring responsibilities
- describe the reporting and oversight related to video monitoring on University property
- outline the transition of **legacy systems** and a process of periodic review of video monitoring
- establish a committee to assist in the administration and application of this procedure.

PROCEDURE

1. PRINCIPLES

Video monitoring will be:

- conducted and handled in accordance with the Alberta *Freedom of Information and Protection of Privacy Act* ("FOIP Act") and any other applicable law of Alberta or Canada
- assessed and balanced with reasonable expectations of privacy
- used only when a justified use can be demonstrated that relates to the purposes set out in this procedure
- accessible to authorized persons only.

2. USES

Video monitoring may be used for purposes related to the safety and security of individuals and to protect and manage University property and therefore includes uses such as:

- monitoring building perimeters, entrances, exits, lobbies, corridors, receiving docks, storage areas, laboratories, areas where University-related activities, functions, performances and events are held and other high risk areas
- monitoring access control systems and restricted access areas
- verifying security/fire/emergency or other alarms or alerts

- conducting video patrols of public areas integrated with University property such as transit stops, parking lots, public streets
- assisting criminal and other law enforcement investigations and proceedings and investigations and proceedings under the *Fraud and Irregularity Policy* and related procedure
- assessing and analyzing data about the use of University property to aid in planning, developing or otherwise managing University property (e.g. monitoring pedestrian and vehicle traffic, etc.).

Video monitoring will not be used to monitor employee or student performance.

3. PUBLIC NOTICE AND SIGNAGE

Except in limited circumstances authorized under the FOIPP Act (e.g. including but not limited to law enforcement purposes) and as determined by the Director of UAPS, when an area on or integrated with University property is monitored by video, signs will be posted to provide the public with reasonable notice of that fact. The form and content of such signs and notices will be determined and approved by the Video Monitoring Committee (see Terms of Reference under Related Links). This information will also be placed on appropriate University websites, including the websites of UAPS and the Information and Privacy Office.

4. REQUESTS FOR VIDEO MONITORING

Any person or unit

- seeking to use video monitoring for the first time, or
- seeking to vary a use of video monitoring that was previously approved under this procedure must first request and obtain approval from the Director of UAPS (or designate).

Any person or unit

- using a video monitoring system that was implemented before the enactment of this procedure and, therefore, not approved under this procedure (a “legacy system”)

must notify the Director of UAPS (or designate) of such use within 90 days of the publication of this procedure and submit a request to the Director of UAPS (or designate) for approval to continue using the legacy system. (See section 8, below, regarding transition of unapproved legacy systems.)

All such requests must be submitted in writing, along with any other information requested by the Director of UAPS (or designate). The Director of UAPS (or designate) will review requests in consultation with Facilities and Operations and, if deemed appropriate by the Director of UAPS (or designate), by the Video Monitoring Committee.

Requests for, and approval of, video monitoring will be consistent with the [Access Control/Security Systems on Urban Campus Areas Procedure](#).

Where the Director of UAPS (or designate) approves a request to use, continue using or to vary an approved use of video monitoring, the approval will:

- briefly describe the purpose for which use of video monitoring was sought and is approved, ensuring that this use and purpose is consistent with this procedure
- specify the video monitoring equipment that may be used and who will install that equipment
- identify the authorized person(s) (by name or position) and their responsibilities
- set out the required standards and reasonable security arrangements to be followed to ensure appropriate collection, access, use, disclosure, storage, retention and destruction of images collected from video monitoring
- set out the form, content and location of signage and other forms of notice
- specify any other matter that the Director of UAPS (or designate) and/or the Video Monitoring Committee deem appropriate.

Approval by the Director of UAPS (or designate) for video monitoring is conditional on compliance with the particulars contained in the approval. The Director of UAPS may suspend or revoke approval for video monitoring at any time.

The Vice-President (Facilities and Operations) is responsible for the operations of video monitoring equipment and associated infrastructure but is not responsible for assuming associated costs, including costs to purchase, support renewals and/or licensing, upgrade, replace or **decommission** video monitoring equipment. The responsibility for such costs rests with the relevant unit, unless the University of Alberta Safety and Security Committee (UASSC) deems the equipment an institutional safety and security priority.

5. VIDEO MONITORING IMAGES: COLLECTION, USE, DISCLOSURE AND OTHER MATTERS

The collection, use, disclosure, security, storage, retention and destruction of, and access to images transmitted or recorded by video monitoring will be handled in accordance with the FOIP Act and any other applicable law of Alberta or Canada.

As required by the FOIP Act, reasonable security arrangements must be made to ensure appropriate collection, use, disclosure, storage, retention and destruction of, and access to images transmitted or recorded by video monitoring.

All recorded information will be retained for a period of 30 days unless:

- a longer retention period is authorized or required by law (e.g. FOIP Act, other legislation, court order, warrant, etc.) or under University policy (e.g. *Legal Hold Procedure*, etc.)
- during the initial 30-day retention period, it appears that the recorded information discloses activity that is or may be contrary to the law or University policies and procedures, in which case the recorded information will be retained for as long as necessary
- the recorded information is used to make a decision that directly affects an individual, in which case the recorded information will be retained for at least one year after using it as required by the FOIP Act, or
- a longer retention period is otherwise approved, or determined to be warranted by the Director of UAPS (or designate), who may consult with Facilities and Operations and the Video Monitoring Committee.

Apart from disclosure to law enforcement agencies, requests from persons external to the University for disclosure of information collected by video monitoring must be made and/or directed to the University's Information and Privacy Office.

Requests from persons internal to the University to use information collected by video monitoring for purposes other than those described in this procedure under "USES", must be made and/or directed to the Director of UAPS (or designate).

Requests to use information collected by video monitoring for the purpose of a research study or University study/survey will be decided in accordance with the *Access to Personal Information for Research/Studies Procedure*.

6. EDUCATION FOR AUTHORIZED PERSONS

Authorized persons will receive appropriate education and direction in relevant areas including privacy laws and principles, the handling of video monitoring equipment, this procedure, and such other appropriate education and direction as determined by the Video Monitoring Committee.

7. REPORTING AND OVERSIGHT

The Director of UAPS (or designate) will report to the Video Monitoring Committee, per that committee's terms of reference, for review and oversight. Reports may include information about:

- the inventory of video monitoring systems on University property
- the uses of information collected by video monitoring
- the standards and security arrangements in place
- relevant criminal or other unlawful activity on University property
- any other information the Director of UAPS (or designate) deems relevant and appropriate.

The Facilities & Operations Associate Vice-President (Operations & Maintenance) will report to the Video Monitoring Committee, per that committee's terms of reference, on video monitoring equipment and infrastructure for review and advice.

8. TRANSITION OF UNAPPROVED LEGACY SYSTEMS AND PERIODIC REVIEW

As of the original approval date of this procedure, there may be legacy systems that do not comply with this procedure. As noted above, any person or unit using a legacy system must notify the Director of UAPS (or designate) of such systems within 90 days of the publication of this procedure for the purpose of ensuring compliance with this procedure and obtaining approval for its continued use.

In the event a legacy system is not approved for continued use, it shall be decommissioned by the relevant unit within a reasonable period of time as determined by the Director of UAPS (or designate).

Regardless of whether a legacy system is approved for continued use or directed to be decommissioned, pre-existing information collected from the legacy system must be retained for 30 days from the date of approval or direction to decommission. Thereafter, the pre-existing information will be destroyed unless one of the exceptions listed above applies (e.g. a longer retention period is authorized or required by law, etc.).

Once a legacy system is approved for continued use, it is no longer a legacy system and recorded information collected after approval shall be retained in accordance with this procedure (e.g. 30 days unless one of the exceptions listed above applies).

Transitioning or decommissioning costs rest with the relevant unit.

The Director of UAPS (or designate) and/or the Video Monitoring Committee may periodically review the use of video monitoring to ensure that continued use of video monitoring in a particular setting remains appropriate and continues to comply with this procedure. Where it is determined that video monitoring is no longer appropriate and does not comply with this procedure, it shall be decommissioned.

9. VIDEO MONITORING COMMITTEE

The establishment of a Video Monitoring Committee is hereby confirmed and will carry out the functions set out in its terms of reference and this procedure.

DEFINITIONS

Any definitions listed in the following table apply to this document only with no implied or intended institution-wide use. ▲Top	
Video monitoring	Video monitoring refers to the collection and/or viewing of live or recorded images and/or sounds from video, digital, electronic or other monitoring and recording systems.
University property	University property includes all lands, buildings and areas owned, leased or controlled by the university.
Student group	As per the <i>Student Groups Procedure</i> , a group of students which has applied to register with and is recognized by the Dean of Students.
Public live-streaming	Public live-streaming refers to the disclosure of real time images from video monitoring to the public or a subset of the public.
Authorized persons	Persons authorized by UAPS and/or the Video Monitoring Committee to view and use live or recorded images and/or sound collected from video monitoring based on a demonstrated need consistent with this procedure.
Legacy system	A video monitoring system that was implemented before the enactment of this procedure.

Decommission	Refers to the retiring and/or removal of a legacy or video monitoring system where approval for use or continued use has been denied or revoked.
---------------------	--

FORMS

Should a link fail, please contact uappol@ualberta.ca. [[▲Top](#)]

There are no forms for this procedure.

RELATED LINKS

Should a link fail, please contact uappol@ualberta.ca. [[▲Top](#)]

[Access Control/Security Systems on Urban Campus Areas Procedure](#)

[Access to Personal Information for Research/Studies Procedure](#)

[Alberta Freedom of Information and Protection of Privacy Act](#)

[Student Groups Procedure](#)

[University of Alberta Information and Privacy Office](#)

[Video Monitoring Committee Terms of Reference](#)