

## **VIDEO SURVEILLANCE POLICY**

### **Rationale and Purpose of the Surveillance System**

In the interest of the safety and security of the Grandin Manor Condominium building (hereinafter referred to as “Grandin Manor”) and all who enter, video surveillance cameras have been installed in vulnerable areas of the building. These areas include, but are not limited to, the outside main and back entrances, the main lobby, the two parkades, the two parkade lobbies, and the two elevators. Video surveillance is required because:

- These areas are readily accessible by all owners, residents, visitors, trades people, and virtually all members of the public.
- These areas are unsupervised and beyond the normal sightlines of the part-time lobby office staff member.
- 24 hour staffing of these areas would be prohibitively expensive and impractical.
- There have been repeated acts of vandalism, theft and mischief in these areas.

This policy is in force to deter endangerment of owners, residents, visitors, trades people, and other members of the public, vandalism, theft, and mischief in unsupervised areas and to identify those individuals involved in such activity for law enforcement and Grandin Manor Condominium By-law enforcement purposes.

Grandin Manor recognizes the need to strike a balance between the individual’s right to be free from invasion of privacy and Grandin Manor’s duty to promote a safe environment for owners, residents, visitors, trades people, and other members of the public and also to protect Grandin Manor’s and the owner’s property. This policy has been developed to comply with:

- Alberta’s Freedom of Information and Protection of Privacy (FOIP) Act.
- Alberta’s Personal Information Protection Act (PIPA).
- Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA).

### **The Surveillance System**

Grandin Manor will use Digital Video Recorders (DVR) in its video system. The system does not have any of the following special capabilities: sound, zoom, facial recognition, or night vision features. The system will be in effect 24 hours per day (with motion sensor).

Signage will be posted at all entrances that surveillance cameras are in use in and around the Grandin Manor building.

Currently, 16 surveillance cameras are located as follows:

- Main Lobby area, field of vision: rear north entry/exit area.

# Grandin Manor

Condominium Plan No. 0023891

9741 - 110 Street, Edmonton AB T5K 2V8

Grandin Manor Site Office:

Tel/Fax: (780) 488-4185

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- Main Lobby area, field of vision: front south entry/exit area.
- Main vestibule, field of vision: intercom area.
- Outside south front entry, field of vision: night fob area.
- Outside north back of building, field of vision: entry/exit area.
- Outside north back of building, field of vision: visitor-parking area.
- Outside south area parking lot, field of vision: parking lot entry/exit area.
- Elevator #1, field of vision: inside elevator car and floor selector panel.
- Elevator #2, field of vision: inside elevator car and floor selector panel.
- Parkade P1 lobby, field of vision: lobby area and door entry/exit area.
- Parkade P2 lobby, field of vision: lobby area and door entry/exit area.
- Inside parkade P1, field of vision: car door entry/exit area.
- Inside parkade P2, field of vision: car door entry/exit area.
- Outside east parkade P1 and P2, field of vision: car door entry/exit area.
- Outside southeast parkade, field of vision: car door entry/exit area.
- Outside southwest parkade, field of vision: car door entry/exit area.

The monitoring equipment is located in a secure and locked room and access to the system is limited to the Grandin Manor Board of Directors and/or their designate in order to perform duties related to their job. These video recorders will retain recordings on the hard drive for a period of up to 28 days at which point, new recordings are made over the previous recordings. The computer time and date stamp is considered to be the recording's identification. A record of an incident will only be stored longer than 28 days where it may be required as part of a criminal, safety, or security investigation or for evidentiary purposes. If a security camera screen shot and/or printout of a security camera screen shot is required of an incident, it will be captured on a Digital Video Disk (DVD) or Memory Stick and these will be clearly labeled.

## Logbook

A logbook will be maintained to record all activities related to video devices and records. Activities include all information regarding the use, maintenance, and storage of records and all instances of access to, and use of, recorded material, including the name of the person accessing the system. All logbook entries will detail the individual's name, date, time and activity. This logbook must remain in a safe and secure location with the video recording equipment. Only authorized personnel may remove the logbook from the secure location.

## Access and Storage

Access to the video surveillance records, e.g., logbook entries, DVDs or Memory Sticks, etc. will be restricted to authorized personnel, and only in order to comply with their roles and responsibilities.

All storage devices that are not in use must be stored securely in a locked receptacle located in an access-controlled area.

## Viewing of Recorded Images

When recorded images from the cameras must be viewed for law enforcement or investigative reasons, this must only be undertaken by authorized personnel, in a private, controlled area that is not accessible to other staff and/or visitors.

## Formal Access Requests

With the exception of requests by law enforcement agencies, all formal requests for video records should be directed to the Grandin Manor Board of Directors. Requests are subject to the requirements of FOIP, PIPA, and PIPEDA.

## Custody and Disposal of Video Recordings/Records

Grandin Manor will take all reasonable efforts to ensure the security of records in its control/custody and ensure their safe and secure disposal. Old storage devices must be disposed of in accordance with an applicable technology asset disposal process ensuring personal information is erased prior to disposal, and cannot be retrieved or reconstructed. Disposal methods may include shredding, burning, or erasing depending on the type of storage device.

## Unauthorized Access/Disclosure and or Privacy Breach

Any individual who becomes aware of any unauthorized disclosure of a video record in contravention of this Policy, and/or a potential privacy breach has a responsibility to ensure that the Grandin Manor Board of Directors is immediately informed of the breach. The following actions will be taken immediately:

- Upon confirmation of the existence of a privacy breach, the Grandin Manor Board of Directors or designate will notify the Office of the Information and Privacy Commissioner of Alberta (OIPC);
- The Grandin Manor Board of Directors and/or designate will work constructively with the OIPC to mitigate the extent of the privacy breach, and to review the adequacy of privacy protection with the existing Policy;
- The Grandin Manor Board of Directors and/or designate will investigate the cause of the disclosure with the goal of eliminating potential future occurrences;
- The Grandin Manor Board of Directors and/or designate, where required, will notify affected parties whose personal information was inappropriately disclosed.

A breach of this Policy may result in disciplinary action up to and including dismissal.

## Inquiries Related to the Video Surveillance Policy

All inquiries regarding the Video Surveillance Policy should be directed to:

The Grandin Manor Board of Directors  
c/o Grandin Manor Condominium Corporation  
9741 – 110 Street NW  
Edmonton, Alberta T5K 2V8 Telephone/Fax: (780) 488-4185

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## References:

1. Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), January 2004.
2. Alberta's Freedom of Information and Protection of Privacy (FOIP) Act.
3. Alberta's Freedom of Information and Protection of Privacy (FOIP) Guidelines for Overt Video Surveillance in the Private Sector, March 2008.
4. Alberta's Freedom of Information and Protection of Privacy (FOIP) Guide to Using Surveillance Cameras in Public Areas, Revised June 2004.
5. Alberta's Personal Information Protection Act (PIPA), S.A. 2003, c. P-6.5, Current as of May 1, 2010.
6. Alberta's Personal Information Protection Act Regulation (A.R. 366/2003), With amendments up to and including Alberta Regulation 51/2010.
7. Alberta's A Guide for Businesses and Organizations on the Personal Information Protection Act, Revised November 2008.
8. Alberta's Condominium Property Act Chapter C-22.
9. Alberta Regulation 168/2000, Condominium Property Act, Condominium Property Regulation (Consolidated up to 221/2004).

## Attachments (Signage):

Grandin Manor Front Entrance Signage (two views)  
Grandin Manor Rear Entrance Signage (two views)  
Grandin Manor Parkade Signage (views of P1 and P2)

<b>POLICY HISTORY:</b>	
Initial policy used: Alberta's Freedom of Information and Protection of Privacy (FOIP) Guide to Using Surveillance Cameras in Public Areas, Revised June 2004.	March 8, 2006.
Initial Draft of new policy:	January 20, 2012
Draft Review:	Jan 23 – Feb 9, 2012
Grandin Manor Board of Directors Approval:	February 9, 2012