

# Policy

---

**Subject:** Security Camera Policy

**Policy Number:** 2021-05

**Effective Date:** November 2, 2023

**Approved by:** NCHC Board of Directors

**Reviewed by:** NCHC General Manager

---

## Purpose

Northumberland County Housing Corporation (“NCHC”) believes that each tenant has a right to feel secure in their home. This policy is to establish the use of video surveillance cameras in NCHC facilities and common spaces for the purposes of increasing tenant, employee and public safety, as well as asset security and general law enforcement, while ensuring the privacy rights of the individual in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O 1990 Chapter M.56 (“MFIPPA”).

NCHC recognizes that video surveillance technology has a high potential for intruding upon an individual's right to privacy and although video surveillance technology may be required for legitimate operational purposes, its use must be in accordance with the provisions of MFIPPA and this policy.

## Definitions

**Personal Information**, as defined under Section 2 of MFIPPA, shall mean information recorded about an identifiable individual, which includes but is not limited to, information relating to an individual's race, colour, national or ethnic origin, sex and age. If a video surveillance system displays these characteristics of an identifiable individual or the

activities in which he or she is engaged, its contents will be considered “Personal Information”.

**Records** shall mean any record of information, however recorded, and includes: a photograph, a film, a microfilm, a videotape, a machine-readable record, and any record that is capable of being produced from a machine-readable record.

**Video Surveillance Technology** shall mean a video, physical or other mechanical electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of Personal Information about individuals in open public spaces (including streets, highways and parks).

**Reception Equipment** shall mean the equipment or device used to receive or record the Personal Information collected through a video surveillance system, including a camera or video monitor or any other video, audio, physical or other mechanical, electronic or digital device.

**Storage Device** shall mean a videotape, computer disk or drive, CD ROM, computer chip or other device used to store the recorded data or visual, audio or other images captured by a video surveillance system.

## Procedures

These procedures will apply to any video, physical or other mechanical, electronic, digital, or wireless surveillance system or device that enables continuous or periodic video recording, observing or monitoring of Personal Information about individuals in open, common or public spaces.

NCHC will be responsible for the implementation, administration, and overall compliance with this policy. NCHC will strive to seek a balance between the safety of tenants and employees, while respecting a tenant’s right to privacy.

## Installation and Use of Surveillance Equipment

The video surveillance system may be justified based on significant safety concerns, asset protection, or verifiable and specific reports of incidents of crime or illegal activity. Cameras may only be installed after authorization from the General Manager of NCHC. Prior to the installation or adjustment of a camera, an analysis on the potential privacy impact will be completed.

---

Only authorized personnel are permitted to perform maintenance on equipment or adjust the position of cameras.

Equipment shall never monitor the inside of areas where tenants, the public and employees have a higher expectation of privacy (e.g. directly in front of a tenant's front door, public washrooms, etc.).

Reception equipment must be located in a strictly controlled access area. Only authorized personnel shall have access to the controlled access area and the reception equipment. To be clear, where equipment is stored in rooms where external contractors have access from time to time, equipment must be further secured in a locked apparatus to ensure equipment cannot be accessed or removed from the property.

## **Collection and Monitoring**

The main purpose of the video surveillance system is to aid in the safety and security of NCHC tenants, staff, contractors, and members of the public visiting NCHC property.

Information collected shall only be used for a consistent purpose to its collection as authorized under MFIPPA.

The monitoring procedures shall be performed based on the following principles:

- Video surveillance monitoring shall be conducted in accordance with all applicable statutes and regulations;
- The video surveillance system shall not monitor individuals in any manner which would constitute a violation of the *Human Rights Code*;
- Video surveillance monitoring shall be conducted in a professional and legal manner;
- As required under MFIPPA, a notice of collection of Personal Information must be placed in all locations where video surveillance systems are in place and these areas shall have signage advising the public of the monitoring and recording;
- Information obtained through the video surveillance system shall be used for purposes allowed under MFIPPA, such as security, safety, investigations, claims against NCHC, or for law enforcement purposes;

- Information obtained through the video surveillance system shall only be released in accordance with the standards set by MFIPPA and the recordings shall be handled in a manner that provides continued security of the recorded information; and
- The cameras will be located in plain sight on NCHC property and the cameras will be restricted to prohibit the viewing inside private residences.

## **Annual Audit**

An audit of the implementation of this policy will be completed on an annual basis. This will be completed by the General Manager or a designate, in conjunction with the Facilities Department and Clerk's office.

The audit will include a review of all logbook entries, access requests by law enforcement, any duplicate copies of records maintained by the Clerk's office, and a confirmation of adherence to: proper storage, signage, and inventory.

Logbook information and access requests will be transcribed into a tracking system to be used for identification of access trends and/or areas of improvement.

## **Signage - Public Notice**

The public will be informed with clearly written signs, as attached as Schedule D, at the perimeter of surveillance areas, which advise that the area is or may be under surveillance. The written signs will indicate that NCHC is responsible for the surveillance and compliance with privacy principles. The written signs will also provide contact information to answer questions and provide information about the system, and state that NCHC has the authority to collect Personal Information by means of video surveillance.

The wording of Schedule D may be modified from time to time subject to legislative requirements without a formal amendment to this policy.

---

## **Personnel Authorized to Operate Video Equipment**

NCHC will ensure that access to the CCTV recording equipment is kept away from the public. The equipment will be in places restricted to only those that need access, such as in a locked room. NCHC will also make sure that the only people who can access the CCTV cameras and other equipment are staff authorized by the General Manager. These authorized staff include specific NCHC staff contracted by NCHC for facility management, including authorized personnel in the Facilities and IT departments, or other contractors or representatives with permission to do so. In accordance with MFIPPA, these persons shall be informed of their obligations and responsibilities regarding the use and disclosure of information.

Authorized personnel should be made aware of their confidentiality obligations regarding the video surveillance and operating policy.

## **Retention and Disposal of Recorded Information**

This policy will apply to the Digital Video Recorder systems used within NCHC facilities. Where required for law enforcement purposes, NCHC will store and retain the storage devices required for evidentiary purposes according to standard operating procedures until they are requested by law enforcement authorities.

The individual DVR systems are set in a recording loop and once the storage capacity has been reached, the recorded information will be overwritten. The retention time for stored information must be set for the least amount of time reasonably necessary to discover or report an incident that occurred in the space under surveillance.

The DVR recordings are transitory data in accordance the Records Retention Program Policy of the County of Northumberland unless an adverse event occurs.

When the recorded information is required for any permissible purpose, two copies shall be made. One copy may be provided to the requester and the second copy shall be retained by the County Clerk, on behalf of NCHC, in alignment with the County of Northumberland's Records Retention Schedule, and for no less than one year.

The County Clerk and/or designate will be responsible for making sure the proper destruction of the copy occurs in accordance to the County of Northumberland's Records Retention Schedule By-law.

---

During the annual audit of information, the logbook will be updated and all previous entries will be collected and submitted to the County Clerk for adherence to the Records Retention Schedule.

## **Access to the Recorded Information**

Access to this recorded information is only permitted in accordance with MFIPPA and this procedure. The recorded information shall not under any circumstances be sold or used for commercial purposes or used for the provision of entertainment.

Access to the recorded information shall be restricted to those responsible for the administration of the video surveillance system and to:

- law enforcement agencies where the recorded images would assist in a specific investigation;
- the people whose images have been recorded and retained who make a request and are granted access to information under MFIPPA; and
- the General Manager, or individuals designated by the General Manager, where access is required for legal or investigative purposes.

Where law enforcement agencies request access to surveillance records, the process outlined below shall be followed. All other requests for access to or copies of video records should be directed to the General Manager, or to individuals designated by the General Manager.

The original copy of the record will be retained by the requesting department for their records, and a second copy will be provided to the County Clerk and will be kept in accordance to the approved records classification and retention schedule.

If the recorded information is viewed for any purpose, but a copy of the recorded information is not created, an entry shall be made into the logbook.

## **Access by Law Enforcement Agency**

Where access to view or obtain a copy of a video surveillance record is required for the purpose of a law enforcement investigation, the requesting officer must complete the

---

Record of Disclosure to a Law Enforcement Agency Release Form (Schedule C) prior to accessing the record.

Release of, or access to, a video surveillance record for the purpose of a law enforcement investigation can be handled at the discretion of the General Manager, or other authorized personnel. The original copy of the completed Record of Disclosure to a Law Enforcement Agency Release Form will be forwarded to the County Clerk, along with the second copy of the recorded information. A logbook entry will be made on site.

## **Unauthorized Access and/or Disclosure (Privacy Breach)**

Any NCHC employee who becomes aware of any unauthorized disclosure of a video record in contravention of this policy, this procedure, and/or a potential privacy breach, has a responsibility to ensure that the General Manager and the County Clerk are immediately informed of the breach.

Where there is a report of an unauthorized disclosure or a privacy breach, at a minimum, the following actions will be taken immediately:

- County Staff, in collaboration with the General Manager, shall work to mitigate the extent of the privacy breach, and to review the adequacy of privacy protection with the existing policy and procedure;
- The County Clerk, in consultation with the General Manager and Facilities Manager or designates, shall investigate the cause of the disclosure with the goal of eliminating potential future occurrences;
- The Facilities Manager or designates, in consultation with the General Manager, shall inform the County Clerk of the events that led up to the privacy breach;
- The General Manager will advise the Board Chair of the incident, in collaboration with the County Clerk;
- All reasonable actions will be taken to recover the records and limit the record's disclosure; and
- The County Clerk, where required, shall notify affected parties Personal Information was inappropriately disclosed and/or the Information and Privacy Commission of Ontario (IPC).

## **Classification of Records**

Records shall be filed in accordance with the approved records classification and retention schedule.

## **Inventory of Cameras**

An inventory shall be maintained of all video surveillance cameras, the location and field of vision of the equipment, the times when surveillance will be in effect and the place where signals from the equipment will be received and monitored.

The Inventory shall be attached as Schedule “A” to this policy and may be amended from time to time as deemed necessary to maintain current information without a formal amendment to this policy.

## **Repealed Policy**

N/A.

## **Legislative Authority**

*Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990.*



# Schedule A

## Inventory of Cameras

Security Cameras have been installed to ensure the safety and security of the following NCHC assets. The locations of the Network Video Recorders (NVR) are identified, and the tables indicate the location of security cameras by channel.

### 24 Queen Street, Port Hope

NVR Location: Utility Room attached to the Common Room Kitchenette.

Channel	Security Camera Location	Description
CH1	Lobby	Observes main entrance, phone and mail room door
CH2	Inner Downstairs Hallway East End	Observes inside front entrance, mailboxes, bathroom door, common room entrance, and downstairs hallway from the east end facing west
CH3	Inner Downstairs Hallway West End	Observes downstairs hallway from the west end facing east
CH4	Inside West Entrance/Stairwell	Observers west entrance interior and west staircase
CH5	Laundry Room	Observes inside laundry room
CH6	Upstairs Hallway Elevator Landing	Observes upstairs hallway facing west from the east end

Channel	Security Camera Location	Description
CH7	Upstairs Elevator Landing	Observes elevator door, laundry room entrance, and top of east staircase
CH8	Downstairs Elevator Landing	Observes the downstairs elevator landing
CH9	East Entrance/Stairwell	Observes east entrance interior and the bottom of the stairwell
CH10	West Entrance Exterior	Observes the west entrance exterior as well as the parking spots on the west side
CH11	South Common Room Exterior	Observes patio and seating area
CH12	South Common Room Exterior	Observes south east parking lot/front entrance exterior

### 43 Wellington Street, Port Hope

NVR location: Inside the electrical/water room attached to the lobby.

Channel	Security Camera Location	Description
CH1	East Entrance Exterior	Observes east entrance walkway, 45 Wellingtons parking lot and the north face of 41
CH2	South East Exterior Corner	Observes parking lot, south face of 43, dumpsters, and south walkways
CH3	Laundry Room	Observes laundry room
CH4	South West Corner 4X4 Pole	Observes 41 Wellington town houses front entrances and parking lot
CH5	South East Exterior Corner	Observes parking lot and 41 Wellington town houses
CH6	Front Entrance Hallway	Observes the front vestibule interior and common room entrance
CH7	East Entrance Hallway	Observes the east entrance interior
CH8	Front Entrance Exterior	Observes the front exterior of 43 Wellington

## 45 Wellington Street, Port Hope

NVR location: Inside the supply room attached to the laundry room.

Channel	Security Camera Location	Description
CH1	Front Entrance Exterior	Observes the main entrance exterior
CH2	Front Lobby	Observes the front vestibule, elevator landing, common room entrance, North stairwell exit and laundry room entrance
CH3	Laundry Room	Observes the laundry room
CH4	North Exterior Wall	Observes garage walkway
CH5	Front Lobby	Observes front vestibule and laundry room hallway from alternate angle
CH6	2nd Floor Hallway North End	Observes elevator landing, laundry room entrance and upper hallway
CH7	Exterior South East Pole	Observes playground equipment
CH8	South Entrance Stairwell	Observes south entrance/stairwell interior

### 330 King Street, Cobourg

NVR location: Inside the storage room off the lobby

Channel	Security Camera Location	Description
CH1	Front Entrance Exterior	Observes part of the parking lot, the main entrance and the walkway
CH2	Lobby	Observes front lobby interior, elevator, and common room entrance
CH3	Lobby	Observes lobby TV, south staircase entrance, and hallway
CH4	Lobby	Observes mailboxes, 2nd lobby entrance at rear, storage room and north west hallway
CH5	Lobby	Observes north east hallway
CH6	NW Rear Stairwell	Observes NW rear exit
CH7	Laundry Room	Observes 1st floor laundry room
CH8	North East Hallway Corner	Observes garbage room and NE entrance
CH9	SW Corner Hallway	Observes SW entrance and garbage room
CH10	North East Stairwell	Observes NE stairwell and entrance

Channel	Security Camera Location	Description
CH11	North Middle Entrance to Lobby Exterior	Observes 2nd lobby entrance exterior
CH12	NE Corner Exterior	Observes garbage bin and walkway
CH13	NW Hallway Y	Observes NW hallway towards exit
CH14	NW Hallway Y	Observes NW hallway towards lobby and north hallway
CH15	West Parking Lot Exterior	Observes west parking lot
CH16	South East Hallway End	Observes SE hallway towards lobby

### 330 King Street, Cobourg

NVR location: Inside the storage room off the NW hallway beside the laundry room

Channel	Security Camera Location	Description
CH1	NE Stairwell	Observes NE stairwell
CH2	NE Corner Hallway	Observes NE hallway and garbage room
CH3	NE Hallway Corner	Observes NE hallway towards elevator landing
CH4	NE Hallway/Elevator Landing	Observes NE hallway from elevator landing
CH5	Elevator Landing	Observes elevator landing
CH6	Elevator Landing/NW Hallway	Observes the NW hallway from the elevator landing
CH7	South Stairs	Observes south stairs that head down to main entrance
CH8	Laundry Room	Observes 2nd floor laundry room
CH9	NW Hallway North Corner	Observes NW hallway from north corner towards elevator
CH10	NW Stairwell	Observes NW stairwell
CH11	West Hallway Y	Observes west hallway towards SW stairwell

Channel	Security Camera Location	Description
CH12	West Hallway Y	Observes west hallway towards north exit and elevator landing
CH13	SW Hallway corner	Observes SW hallway and garbage room
CH14	SW Stairwell	Observes SW stairwell
CH15	South Exterior	Observes main parking lot
CH16	South Exterior	Observes south face of building and parking lot



## 8 King Street East, Colborne

NVR location: Inside the storage room down the laundry room hallway next to the washroom

Channel	Security Camera Location	Description
CH1	1st Floor Hallway North End	Observes the 1st floor hallway
CH2	Front Entrance Inner Hallway	Observes front entrance and south stairwell entrance
CH3	North Entrance Interior	Observes north entrance interior
CH4	2nd Floor Hallway South End	Observes the 2nd floor hallway
CH5	1st Floor Hallway South End	Observes 1st floor hallway and electrical room
CH6	Temporary Entrance Foyer	Observes temporary entrance interior
CH7	Temporary Entrance Hallway	Observes inside inner temporary entrance door
CH8	2nd Floor Hallway North End	Observes 2nd floor hallway
CH9	Elevator Utility Room	Observes inside elevator utility room

## 6 Percy Street, Colborne

NVR location: Inside the storage room attached to the first floor laundry room

Channel	Security Camera Location	Description
CH1	Front West Exterior	Observes the parking lot and dumpster
CH2	Front Lobby	Observes main entrance interior, and west stairwell entrance
CH3	Front Lobby	Observes common room entrance, lobby TV, and utility room entrance
CH4	North Entrance Interior	Observes inner entrance at north side of building & the bottom of the north stairs
CH5	East Entrance Interior	Observes east stairwell and entrance
CH6	2nd Floor Elevator Landing	Observes 2nd floor elevator
CH7	1st Floor Elevator Landing	Observes the first floor elevator
CH8	1st Floor Laundry Room	Observes the 1st floor laundry room

---

**12 Meade Street, Brighton**

NVR location: Inside the electrical room attached to the laundry room

Channel	Security Camera Location	Description
CH1	Laundry Room	Observes laundry room
CH2	Centre Hallway	Observes east hall
CH3	Exterior Front	Observes walkway, parking lot, and garbage bin
CH4	Front Foyer Interior	Observes front entrance, intercom and mailboxes
CH5	Centre Hallway	Observes west hall

---

**12A Meade Street, Brighton**

NVR location: Inside the electrical room attached to the laundry room

Channel	Security Camera Location	Description
CH1	1st Floor Elevator Landing	Observes 1st floor elevator
CH2	2nd Floor Elevator Landing	Observes 2nd floor elevator
CH3	North East Stairwell	Observes NE stairwell exit
CH4	Landry Room	Observes laundry room
CH5	West Stairwell/Staircase	Observes west staircase and exit
CH6	Common Room	Observes common room
CH7	Front Lobby Hallway	Observes front lobby and lobby TV
CH8	Front Entrance Exterior	Observes exterior front entrance

## 2 Francis Street, Brighton

NVR location: Inside the storage room located off the main hallway beside the washroom

Channel	Security Camera Location	Description
CH1	North Stairwell	Observes north stairwell exit
CH2	2nd Floor Laundry Room	Observes the 2nd floor laundry room
CH3	East Exterior Main Entrance	Observes parking lot and pathway to main entrance
CH4	1st Floor Elevator Landing	Observes elevator landing and common room entrance
CH5	1st Floor Elevator Landing	Observes main entrance, intercom, and mailboxes
CH6	South Stairwell	Observes south stairs and entrance
CH7	2nd Floor Elevator Landing	Observes 2nd floor elevator landing, south hallway and east top of stairs
CH8	1st Floor Laundry Room	Observes 1st floor laundry room

---

**111 Front Street, Campbellford**

NVR location: Inside the storage room off the garbage room

Channel	Security Camera Location	Description
CH1	1st Floor Elevator Landing	Observes 1st floor elevator and front entrance interior
CH2	South Stairwell	Observes south stairwell and entrance
CH3	East Stairwell	Observes east stairwell and entrance
CH4	West Exterior North Corner	Observes south parking lot & 112 front east side
CH5	West Exterior Above Storage	Observes dumpster and south parking lot
CH6	NW Corner Exterior	Observes north parking lot and lane way
CH7	1st Floor Laundry Room	Observes 1st floor laundry room
CH8	Front Lobby	Observes mailboxes, intercom and front door

**112 Front Street, Campbellford**

NVR location: Inside the upstairs storage room

Channel	Security Camera Location	Description
CH1	South East Corner Exterior	Observes dumpster and south parking lot
CH2	North East Corner Exterior	Observes front walkway and seating area
CH3	Main Foyer Interior	Observes front entrance, common room entrance, laundry room entrance and 1st floor hallway
CH4	1st Floor Elevator Landing	Observes elevator and garbage room entrance
CH5	North Stairwell Entrance	Observes north stairwell interior
CH6	2nd Floor Elevator Landing	Observes 2nd floor elevator landing and laundry room
CH7	2nd Floor Elevator Landing	Observes 2nd floor hallway
CH8	1st Floor Laundry Room	Observes 1st floor laundry room
CH9	South Stairwell Interior	Observes south entrance and stairwell interior

---

# Schedule B

---

Logbook Template



---

# Schedule C

---

## **Request for Viewing or Release of a Video Recording from Northumberland Community Housing Corporation (NCHC) by a Law Enforcement Agency**

Police officers must fill in this form before NCHC will allow viewing or release any surveillance recording.

NCHC may release the record if requested by police as provided under section 32(g) of the *Municipal Freedom of Information and Protection of Privacy Act*.

I, \_\_\_\_\_ (name of Officer), \_\_\_\_\_ (badge number),  
of the \_\_\_\_\_ (name of police force), request a copy of the  
following record(s):

- 1.
- 2.

The record has personal information about \_\_\_\_\_ (name of individual), or is related to an incident that took place on \_\_\_\_\_ (date and approximate time).

I am asking for this record to help with an investigation \_\_\_\_\_ (investigation ID), that may lead to a law enforcement proceeding.

We will not release the record to third parties including the media without NCHC's prior consent.

---

Signature of Officer

Badge/Identification Number

---

Signature of Person Authorized to  
Release the Record

Date

---

Date Recorded Device Returned

## Schedule D

---

### Sample Signage Content



#### **Attention**

### **This area may be Monitored by Video Surveillance Cameras**

The personal information collected at this site is collected under the authority of the Northumberland County Housing Corporation's Video Surveillance Camera Policy and protected in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). This information is used for the purpose of promoting public safety and reduction of crime at this site and is collected through authority under section 28(2) of MFIPPA.

Any questions about this collection can be directed to the

County Clerk  
1-905-372-339 ext. 2238