

Workplace Video Surveillance Policy



1. POLICY

ABC Company reserves the right to install surveillance cameras and equipment in the workplace for purposes of providing a safe, secure and healthy environment for employees, vendors and visitors. At the same time, ABC Company acknowledges that the collection, use and disclosure of an individual's images and other personal information via surveillance technology is potentially privacy invasive. Accordingly, ABC Company will respect individuals' privacy rights and implement safeguards outlined in the Policy to ensure that its operation of surveillance equipment is as minimally invasive as possible. ABC Company will also limit its use and disclosure of the video, images and other personal information it collects via surveillance to security, safety, health and law enforcement purposes only.

2. PURPOSE

The purpose of this Policy is to make employees aware of ABC Company's use of why, how and where we use surveillance technology, the personal information we collect and how we safeguard the confidentiality of the personal information we collect from such use. This Policy establishes a general framework. Because employee privacy rights vary from jurisdiction to jurisdiction, some of the rights, obligations and procedures set out in this Policy may not apply the same way—or apply at all—to ABC Company employees working in certain locations and/or conducting certain operations.

If you're unsure or have questions about the matters this Policy covers, please ask [*insert contact, e.g., the HR or privacy director*].

3. DEFINITIONS

For purposes of this Policy:

Footage means footage, images, records and other personal information collected by surveillance equipment;

Public area means a location where a reasonable expectation of privacy is not violated by recording acts that may normally be openly observed, including but not limited to building entrances, walkways, parking lots, elevators, lunch and break

rooms, shop floors, clubhouses and other common areas;

Private area means a location in which there is a reasonable expectation that a user's behavior may not be openly observed, including but not limited to locker and changing rooms, residential housing rooms, bathrooms and private office spaces;

Surveillance equipment means closed circuit television (CCTV) cameras and any other system, camera, technology device, communications device or process, used along or in conjunction with a network, for purposes of gathering, monitoring, recording, or storing images of ABC Company facilities and the people present at such facilities. Images captured by video surveillance technology may be *real-time* or preserved for review at a later date.

4. INSTALLATION OF SURVEILLANCE EQUIPMENT

- 01 Approval Required

No person may install or arrange for the installation of surveillance equipment on ABC Company without the advanced approval of [*insert approval authority name or office*].

- Where Surveillance Equipment May Be Installed

Surveillance equipment may be installed in public areas. Installation of surveillance equipment in private areas will not be permitted except where [*insert approval authority name or office*] provides approval in advance after determining that the installation is necessary to protect security, safety or health or for purposes of law enforcement. Installation of surveillance equipment does not necessarily mean that the equipment will be used and the area monitored 24/7/365.

5. OVERT & COVERT SURVEILLANCE

In most cases, use of surveillance equipment will be overt so that individuals know they are being monitored. Accordingly, signs will be prominently posted inside or at the entrance of any area in which surveillance equipment is installed indicating that the area is being monitored. Covert, or secret surveillance will be used only in exceptional cases where [*insert approval authority name or office*] provides approval in advance after determining that:

- The covert use is allowed by law;
- The covert use is not only necessary but also the only way to accomplish the security, safety, health or law enforcement objective;
- The benefits that the personal information the covert use collects significantly outweighs the resulting privacy harms to the persons affected by the covert use; and
- The covert use is limited in duration and carried out in the least privacy invasive manner possible that still enables the essential information to be collected.

6. HOW SURVEILLANCE WILL BE CONDUCTED

Where surveillance equipment is used, it will be operated only by properly authorized

personnel in a manner that is legal, ethical, professional and consistent with all ABC Company HR policies and codes of conduct, including but not limited to policies governing sexual harassment, personal privacy and respectful workplaces. Monitoring individuals based on their race, gender, sexual orientation, national origin, disability or other characteristic that human rights laws protect from discrimination is strictly prohibited.

7. ACCESS TO FOOTAGE

ABC Company will limit access of footage to authorized personnel. In addition, *[insert approval authority name or office]* may approve written access requests from other Company or law enforcement personnel for very limited purposes. Where such requests are granted, the footage must be viewed in the presence of a trained ABC Company staff member to ensure that its integrity is maintained. *[insert name or office]* will maintain a written access log tracking all instances of access to, or use of, footage listing:

- The date and time of access;
- The person granted access; and
- A summary of the reason access was necessary.

8. USE OF FOOTAGE

ABC Company will use footage obtained from surveillance equipment exclusively for security, safety, health and law enforcement purposes. Footage will not be used to evaluate employee job performance. Nor will surveillance equipment be used to collect data about behaviour of groups of individuals using an area over a period of time, such as parking patterns or times individuals spend in break rooms.

9. DISCLOSURE OF FOOTAGE

ABC Company will not show or provide footage obtained from surveillance equipment to anyone other than authorized personnel, subject to the following exceptions for:

- Law enforcement agencies for purposes of an investigation;
- Use at a formal ABC Company disciplinary proceeding;
- Assisting in the identification of individuals relating to a criminal incident; and
- Other circumstances or uses approved by the *[insert approval authority name or office]* or required by law.

Where made, disclosure of footage to third parties will be limited to the amount or extent necessary to accomplish the purpose(s) for which the system was installed, and limited to:

- Police and other law enforcement agencies, where the footage could assist in a specific criminal enquiry and/or the prevention of terrorism and disorder;
- Prosecution agencies;
- Relevant legal representatives;
- People whose images have been recorded and retained, unless an exemption applies;
- Assisting in the identification of a victim, witness or perpetrator involved in

- a criminal incident; and
- Members of staff involved in ABC Company disciplinary processes.

10. SAFEGUARDING OF FOOTAGE

The IT department will keep all footage from surveillance equipment in a secure manner or locked facility in accordance with the ABC Company Data Security Policy. No copies of footage will be made except where necessary for backup or evidentiary purposes, in which case the footage must be copied onto a CD, DVD or other permanent storage medium and physically labeled with a date, time and location of the surveillance.

Footage must be kept for a maximum of 30 to 90 days unless otherwise required for the purposes outlined in the Policy. Footage must be erased or otherwise destroyed at that point unless it must be retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the [*insert approval authority name or office*].

11. POLICY VIOLATIONS

Any collection, use or disclosure of footage for purposes other than those listed in this Policy are strictly prohibited. Policy violations of the policy will result in appropriate disciplinary action in accordance with ABC Company HR policies and disciplinary procedures. No footage obtained in violation of this Policy may be used in a disciplinary proceeding.