

## *TOWN OF THREE RIVERS POLICY*

### **SURVEILLANCE POLICY**

Policy Number: TR25-01

Date of Approval: April 14, 2025

Approved By: Town Council

Review Date: Yearly

---

#### **Policy Statement**

The Town of Three Rivers ("**Three Rivers**") has implemented public video surveillance systems in selected municipal buildings and facilities to safeguard public assets, enhance the safety of public spaces and deter theft and vandalism.

Three Rivers is committed to using video surveillance solely for legitimate security and safety purposes. All footage collected will be handled responsibly, with stringent measures in place to protect personal information. Surveillance footage will be securely stored, access will be limited to authorized personnel, and any use of the footage will be in strict accordance with this policy and relevant privacy regulations.

#### **Purpose**

Three Rivers has installed surveillance in various municipal facilities to protect public assets, deter theft and vandalism, and enhance public safety. This policy defines the appropriate use, access and management of video surveillance in a manner that complies with applicable privacy laws, respects individual privacy rights, and promotes transparency and accountability in municipal operations.

This policy aims to balance Three River's legitimate interests in safeguarding its assets and promoting public safety with the public's right to privacy. This policy establishes clear guidelines on the collection, storage, use and disclosure of surveillance footage, ensuring that these practices meet the highest standards of security and privacy protection.

#### **Application**

This policy applies to:

- all video surveillance equipment installed in or on properties owned, leased or operated by Three Rivers, including but not limited to municipal buildings, recreational facilities, and other public assets (See, Schedule A);
- all employees, independent contractors and the general public who work within or visit monitored areas.

## Definitions

*Access Log* – A record documenting each instance of access to surveillance footage, including the date, time, individual accessing the footage, and reason for access.

*Authorized Personnel* – Employees of the Town of Three Rivers designated by the CAO to access, monitor, and manage surveillance footage.

*Surveillance Footage* – Any recorded visual information collected by the video surveillance system which does/does not include audio.

*Video Surveillance System* – The system of cameras, recording equipment, servers and software used by Three Rivers to capture, store, manage and view video footage for security and safety purposes.

## Guiding Principles

Three Rivers adheres to the following principles when operating video surveillance equipment to maintain transparency, accountability and privacy:

- **Legitimacy and Necessity:** Surveillance is used solely to enhance public and asset safety where necessary.
- **Transparency:** Signage will be clearly posted in all surveillance areas, informing employees and the public of the camera's presence and purpose.
- **Minimal Intrusion:** Surveillance is limited to public and high-security areas, avoiding areas where privacy is expected.
- **Data Security and Confidentiality:** All surveillance data is securely stored, with access limited to authorized personnel and used strictly for security-related purposes.
- **Accountability:** Access and use of footage are strictly controlled and monitored to ensure compliance with laws and this policy.

## Camera Locations

Cameras will be positioned strategically to cover high-traffic, high-security zones where asset protection and public safety are a priority. Cameras will capture only the necessary field of view to achieve security objectives avoiding private areas. Schedule A contains a list of all camera locations.

## Access and Authorization

Only the CAO or designated municipal employees will be authorized to operate the system and access footage. Each instance of footage access will be logged, documenting the date, time, personnel involved and reason for access.

## **Recording**

Cameras operate continuously during facility hours, with 24-hour monitoring in essential areas.

## **Storage, Retention and Disposal of Video Surveillance Footage**

Three Rivers is committed to handling surveillance data responsibly, ensuring that all footage is stored securely, retained only as long as necessary, and disposed of in a manner that respects privacy rights and complies with applicable laws.

### **1. Secure Storage**

All video surveillance footage will be stored on encrypted servers or storage devices located in a secure, access-controlled facility. Only authorized personnel will have access to these servers.

### **2. Retention Period**

Video surveillance will be retained for 60 days, after which it is automatically scheduled for secure deletion unless flagged for ongoing investigation or legal use. The retention period will be reviewed regularly to ensure it complies with legal requirements, operational needs and privacy best practices.

### **3. Audits**

Audits of access logs will be conducted periodically by the CAO to ensure adherence to access permissions and compliance with privacy laws. Unauthorized access attempts will be investigated, and corrective action will be taken, up to and including termination of employment.

### **4. Secure Disposal**

Once footage has reached the end of its retention period, it will be automatically deleted by the system through a secure, irrecoverable process. For footage retained beyond the standard retention period, authorized personnel will be responsible for manually deleting the footage. All deletion actions (both automated and manual) will be documented.

## **Employee Access**

Three Rivers recognizes the employees' right to access personal information including video footage in which they appear, in compliance with A Bylaw to Regulate Access to Information and Protection of Personal Information Bylaw #2023-04. The following outlines how employees may request access to footage and the protections in place.

1. Written Request – Employees seeking access to the footage in which they appear must submit a formal written request to the CAO. The request should include the date, approximate time, and location where the employee was captured on camera to facilitate efficient searches.
2. Notification – Once a request is received, the CAO will confirm receipt and notify the employee within 5 business days.
3. Verification – Employees must verify their identity; the CAO will ensure that the individual appearing in the footage is the person requesting the footage or is otherwise authorized to access the footage.

If other employees are identifiable in the footage, reasonable steps will be taken to protect their identity, such as face blurring, redaction or other anonymizing techniques based on the technology available and the nature of the footage.

Access to footage that does not directly involve the requesting employee will not be granted. Access will be granted as a supervised viewing during which the employee will be able to review the footage in a secure location. Copies of footage will not be provided unless legally required or in exceptional circumstances approved by the CAO.

Employees may appeal a denied request by submitting a written appeal to the CAO within 10 working days of receiving the initial denial.

## SCHEDULE A: Surveillance Camera Locations

Camera ID	Location	Field of Vision	Hours of Operation
	<b>Town Office Montague</b>		24/7
1		Flag Poles/ Queens Road	
2		Reception Area	
3		Fraser Street	
4		Blank	
5		Admin Desk	
6		Hallway	
7		Generator Parking	
8		Entrance Parking	
	<b>Museum</b>		24/7
1		Montague bridge	
2		Main Floor	
1		3 <sup>rd</sup> floor	
2		3 <sup>rd</sup> floor	
3		2 <sup>nd</sup> floor	
4		2 <sup>nd</sup> floor hall	
	<b>Splash Park</b>		24/7
1		Splash Park Pad	
2		Sway glider/washroom front	
	<b>Wellness Centre</b>		24/7
1		Ice	
2		Garbage container	
3		Hambly room	
4		Dressing room hall	
5		Lobby mid	
6		Lobby front	
7		Rear of building	
8		Heated seats	
9		stands	
10		alcove	
11		Lobby front	
12		Generator	

Camera ID	Location	Field of Vision	Hours of Operation
	<b>Sewer plant Montague</b>		24/7
1		Rear yard right	
2		Rear yard	
3		Rear yard left	
4		Front parking	
	<b>Maintenance building Montague</b>		24/7
1		Left overhead parking	
2		Entry	
3		Rear Compound	
4		Side compound	
	<b>Day Docks Landing</b>		24/7
1		Left Side Building	
2		Front entrance/ramp	
3		Basement entrance	
4		Wharf	
5		Rear deck	
6		Right Deck/grounds	
	<b>Georgetown Maintenance</b>		24/7
1		Driveway	
2		Rear	
3		Driveway/ Gardens	
4		Interior Bay/doors	
	<b>Georgetown Town office</b>		24/7
1		Interior Hall/front door	
2		Parking Area	
3		Reception Area	
	<b>Ballfield Cardigan</b>		24/7
1		Maintenance Shed	Recorder only
2		Parking Lot	
3		Washrooms/field	
	<b>West street washrooms</b>		24/7
1		Exterior washroom door men's	Recorder only
2		Exterior washroom door women's	
3		Trail to Gazebo	