
Type:	C – Institutional	Last Approved: May 26, 2016
Executive Responsibility:	Chief Financial Officer and Vice-President Administration	Next Review: May 2021
Administrative Responsibility:	Executive Director Facilities & Ancillary Services	Procedure: 44.17.001

STATEMENT:

The purpose of this policy is to regulate the implementation and use of Audio Video Security (AVS) systems on Vancouver Island University (VIU) premises. This policy does not apply to audio video equipment used solely for educational purposes.

Ensuring the safety, security and privacy of employees, students and visitors is a priority for VIU. VIU also recognizes its duty to promote and maintain a safe and secure environment while protecting each individual's right to privacy.

AVS systems are used by the University to deter unlawful conduct as well as to record such conduct. Information collected may be used as a criminal investigative tool and for the purposes of property management, such as insurance claims, snow closure decisions, and emergency response coordination. AVS systems are not used in areas where the university community or public have a reasonable expectation of privacy.

VIU collects, uses, stores and discloses AVS data in accordance with the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA).

Related Policies and Procedures:

[Procedure 44.17.001](#) [Audio Video Security Systems](#)

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PROCEDURE:

1. REQUIREMENTS

In general, installation of monitoring and recording equipment such as video cameras and/or audio recording devices will be restricted to public areas. Operation will occur only under circumstances of existing safety or security concerns after review by the Vancouver Island University (VIU) Audio Video Security (AVS) Committee, consideration by the Executive Director, Facilities and Ancillary Services and approval by the University Secretary.

The University will install an AVS system only as an exceptional step to address a pressing need or risk and only when privacy concerns are outweighed by the need and there is no other reasonable option. The location of an AVS system must be necessary to meet the purposes of the installation. Any AVS system will be installed in such a way so as to achieve minimal collection of personal information while satisfying the approved purposes.

An AVS system will not normally be installed in teaching spaces or locations where confidential or private activities and functions are expected to be routinely carried out (e.g. office, conference or meeting room, washroom).

An AVS system will not be installed in a private office unless the occupant agrees. Any such installation will not be used to monitor work performance. When an AVS system is installed in an office, individuals with right of access to that office - either because they have key access or because they have been invited to attend a meeting therein - will be informed of the presence of the system. A notification of the presence of the equipment shall be in prominent locations at the entrance to the office and inside the office.

2. REQUEST

An individual seeking to have an AVS system installed is to submit a completed *AVS System Assessment Form* to Facility Services. A risk analysis and evaluation will be completed by Facilities Services. The request and assessment will then be reviewed by the AVS Assessment Committee.

The AVS System Assessment Committee includes one designate each from:

- Facility Services and Campus Development
- Health and Safety Services Office
- Vancouver Island University Students' Union

- BC Government and Service Employees' Union Local 702
- Canadian Union of Public Employees Local 1858
- Vancouver Island University Faculty Association
- Administration, as selected by the Provost and Vice-President Academic

The Committee chair will be elected annually by the Committee.

A request that is recommended by at least 75% of the Committee present and voting will be forwarded to the Executive Director, Facilities and Ancillary Services for consideration. If the request is supported by the Executive Director, Facilities and Ancillary Services, the request will be forwarded to the University Secretary for review as the University Privacy Officer.

Any final decision of the Executive Director, Facilities and Ancillary Services or the University Secretary will be communicated in writing to the Committee and the individual who submitted the request.

3. NOTIFICATION

Notice of the use of an AVS system will be given through prominently displayed signage that includes contact information for Facility Services.

A sign indicating that an AVS system is in the area will be posted only when a system has been installed.

4. SECURITY AND RETENTION

Only authorized individuals who require the information in order to fulfill their duties shall have access to an AVS system or records. Authorized personnel shall be informed of the purposes of the system and versed in privacy protection. For the purposes of this procedure, authorized individuals are those staff approved by the Executive Director, Facilities and Ancillary Services as required by their position to investigate safety and security matters. AV technicians will be authorized to access the systems for installation and maintenance purposes only. Any access will be documented by the Executive Director, Facilities and Ancillary Services in a log maintained for all AVS systems.

AVS equipment shall be stored in a controlled access area. All records (e.g. digital data) produced by an AVS system shall be kept in a secure location by the Executive Director, Facilities and Ancillary Services and accessible only by authorized individuals. Removable electronic storage devices containing AVS data shall be authorized by the Executive Director, Facilities and Ancillary Services and shall be encrypted, numbered and dated.

The standard retention period for recordings shall be 31 days. The retention period may be extended by the Executive Director, Facilities and Ancillary Services where appropriate to aid an investigation. Recordings will be deleted and purged at the end of the retention period. Recordings must be deleted and/or disposed of securely in a manner approved by the Executive Director, Facilities and Ancillary Services.

A recording used to make a decision about an individual shall be retained for a minimum of one year in accordance with the British Columbia *Freedom of Information and Protection of Privacy Act*.

5. ACCESS AND DISCLOSURE

Any request for access to information collected by an AVS system will be dealt with in accordance with the British Columbia *Freedom of Information and Protection of Privacy Act*.

Disclosure of records for law enforcement purposes will be dealt with in accordance with the British Columbia *Freedom of Information and Protection of Privacy Act*.

6. REVIEW

Facility Services and Campus Development will maintain a complete inventory of all AVS systems in operation indicating date of installation, reason for installation and location.

The AVS System Assessment Committee shall conduct a review within the first six months of the installation of an AVS system and thereafter at least annually at irregular intervals to audit the functioning, effectiveness, use and security of the equipment, the AV Security software, and the storage devices. Reviewers will be appointed by the AVS System Assessment Committee. The results of each review shall be documented in detail and any concerns must be addressed promptly and to the satisfaction of the AVS System Assessment Committee. The reviewers will take special note of the initial reasons for the installation and determine whether the problems identified have been addressed.

Any recommendations for changes will be forwarded to the Executive Director, Facilities and Ancillary Services for consideration. If the request is supported by the Executive Director, Facilities and Ancillary Services, the request will be forwarded to the University Secretary for review as the University Privacy Officer.

Results of reviews will be published on the VIU Facility Services' website as part of the minutes for the AVS System Assessment Committee.

Related Policies and Procedures:

[Policy 44.17](#)

[Audio Video Security Systems](#)

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