

Personal Video Surveillance Systems Policy

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| Policy name | Personal Video Surveillance Systems Policy |
| Policy number | 5.9 |
| Date developed | February 1 st 2021 |
| Date reviewed or revised | |
| References | <i>Personal Information Protection and Electronic Documents Act</i> <i>Housing Services Act, 2011</i> <i>Lease Agreement</i> <i>Release of Personal Information</i> |
| Also see | <i>Video Surveillance Systems Policy</i> <i>Security Policy</i> <i>Privacy and Confidentiality Policy</i> <i>License Agreement-Policy for Personal Video Surveillance System</i> |

Policy statement

This Personal Video Surveillance Systems Policy (the “Policy”) has been created to ensure that Housing Cambridge tenants only implement personal video surveillance (visual only, audio recording prohibited) to the extent that such surveillance is lawful and necessary for ensuring the safety and security of themselves, and their assets and personal property specific to the tenant’s immediate unit. This Policy only covers family site locations, as apartment locations cannot have camera’s fixed to their

door/area as the common area of the hallway is considered Housing Cambridge property ie. not personal property.

Purpose and scope

Purpose

Pursuant to the *Housing Services Act* (“HSA”), Housing Cambridge is lawfully authorized to engage in the activity of providing community-based planning and delivering housing and homelessness services. While carrying out these lawfully authorized activities, Housing Cambridge must take reasonable steps to ensure the safety and security of tenants, staff, members of the public, corporate assets and property.

Housing Cambridge recognizes that Personal video surveillance technology has the potential to infringe upon an individual’s right to privacy and has created this Policy to avoid such infringements.

Tenants are only to install Personal Video Surveillance Systems with prior written permission of Housing Cambridge as per the Housing Cambridge Lease, Sec. 3.03(i), and guidelines presented below.

Scope

This policy applies to all tenants of Housing Cambridge who would like to install Personal Video Surveillance Systems at their unit.

Housing Cambridge tenants may be subject to legal action under the Residential Tenancies Act and/or applicable privacy laws should they breach this policy.

Definitions

Designated staff

The staff person(s) or department who has been designated to complete a particular action or requirement.

Personal information

Information as collected by Housing Cambridge pursuant to this policy means recorded information about an identifiable individual, including, but not limited to, information relating to an individual's race, colour, national or ethnic origin, sex, age. If an Personal Video Surveillance System displays such characteristics of an identifiable individual or the activities in which he or she is engaged, its contents will be considered "personal information."

Procedure

Request and Approval Procedure

Any request to install a Personal Video Surveillance System at a tenant unit, must be submitted in writing to the Housing Cambridge office prior to installation as per Sec. 3.03(i) of the lease.

Any request must be made using Housing Cambridge's License Agreement-Policy for Personal Video Surveillance System

Requests will be responded to, in writing, within 30 days. In situations where there is an immediate threat of violence, with supporting documentation, the process may be expedited.

In determining if personal video surveillance is "necessary", Housing Cambridge will consider the following factors:

1. Whether the problem to be addressed by personal video surveillance is real, substantial and pressing;

2. Whether less intrusive alternatives to surveillance are available to ensure safety and security;
3. Whether the benefits of Personal video surveillance substantially outweigh negative impacts upon privacy;
4. The sensitivity of personal information being collected based on the nature of the space being surveilled; and
5. Whether the amount of personal information collected through surveillance is necessary to ensure safety and security.

Requirements for Personal Video Surveillance System Installation

1. Audio recordings are strictly prohibited.
2. Identify where the personal video surveillance system is to be installed and the area that the camera will cover.
3. The cameras field of view shall only cover the tenant's immediate unit and personal property and must not infringe on the privacy of other tenants.
4. Provide details on the proposed make and model of personal video surveillance system, the proposed installation, including hardwired v. battery, and how and where it will be mounted, to ensure there will be no damage to the Landlords'/owners property.

Documentation and Record Keeping

Housing Cambridge will document the conditions of the approval, in writing and signed by the tenants and staff. The documentation will specify the installer, the make and model of the approved personal video surveillance system, the

location and method of installation, obligations to remove and repair when the tenant vacates.

It would also reserve the landlord's right to require the personal video surveillance system to be removed before the end of the tenancy if it creates potential issues for the landlord (generally as a result of concerns about other tenants' privacy).

Notice

Housing Cambridge requires that the tenant post an approved sign that notifies the public of the existence of Personal Video Surveillance System. Signs shall be posted clearly near each camera.