

 city of Woodstock	The City of Woodstock Policy Manual
Subject:	Video Surveillance
Policy Number:	GA026
Revision:	01
Approved by Council:	October 21, 2021
Amended:	August 14, 2025

Statement of Principle

The purpose of this policy is to provide guidelines with respect to video surveillance at City of Woodstock owned/operated/leased facilities and vehicles in accordance with the privacy provisions of the Municipal Freedom of Information Act (“the Act”).

Proper video surveillance, when deemed necessary, is one of the most effective means of helping to keep Municipal facilities and property operating in a way that protects security, safety, and privacy.

The purpose of this policy is to establish guidelines which are intended to achieve a balance between security, safety, and an individual’s right to privacy. Specifically, this Policy will lay out the City of Woodstock’s requirements and responsibilities with respect to:

- Installation of video surveillance systems;
- The operation of video surveillance systems;
- The use of information obtained through video surveillance systems; and
- Custody, control, and access to records created through the video surveillance systems.

Application

This policy applies to all City facilities and vehicles, and to all employees, elected officials, patrons, visitors, and tenants of City facilities and vehicles. It applies to all types of camera surveillance systems and surveillance monitors that are used for security purposes at City of Woodstock owned/ operated/ leased facilities and vehicles. This policy does not apply to the videotaping of City Council meetings.

Definitions

“IPC” – Information and Privacy Commission of Ontario. IPC oversees compliance with the privacy protection provisions of MFIPPA and conducts investigations into privacy complaints. IPC also provides guidance regarding Ontario’s access and privacy legislation.

“Facility” – Means any building or land that is either owned, occupied, or leased by the City of Woodstock, including but not limited to, administration buildings, arenas, community centres, swimming pools, parks, and sports complexes.

“FOI Coordinator” - shall mean the City Clerk, who is the Freedom of Information Coordinator designated by the City of Woodstock under Municipal Code Chapter 129.

“Director of IT” - Means the Director of Information Technology for the City of Woodstock.

“MFIPPA” – Municipal Freedom of Information and Protection of Privacy Act. The purpose of the Act is to provide a right of access to information under the control of institutions and to protect the privacy of individuals with respect to personal information about themselves held by institutions.

“Personal Information” – is defined in Section 2 of MFIPPA as recorded information 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, it will be considered “personal information” under the Act.

“Vehicle” – Means any vehicle that is either owned, operated, occupied, contracted or leased by the City of Woodstock, including but not limited to Transit buses.

“Video Surveillance System” – refers to a video, physical or 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, public spaces.

Administration

Installation of video surveillance systems

Video surveillance systems will only be installed in public areas where surveillance is deemed necessary to ensure the ongoing safety and security of City of Woodstock facilities and vehicles. Each proposed location will be assessed on a case-by-case basis to determine the effect that the video surveillance system will have on privacy.

Video surveillance systems will only be installed to monitor City of Woodstock facilities or vehicles and will not be directed to look at any other non-City owned property.

Video surveillance systems shall never monitor the inside of areas where the public and employees have an expectation of privacy, such as change rooms or washrooms.

Video surveillance systems may operate up to twenty-four (24) hours per day, seven (7) days per week.

The City of Woodstock shall ensure that the public is notified of the presence of video surveillance systems by ensuring appropriate signs are installed in accordance with this policy. The signs will be a consistent size and format and will advise all people that the video surveillance is in use, identify the legal authority for collection of personal information, the principle purpose for which the personal information will be used, and will provide the title, business address, and telephone number of an individual who can answer more questions about the collection.

The operation of video surveillance systems

The Director of IT is authorized to designate persons to operate the video surveillance systems. Only those authorized will be permitted to operate the system.

The Director of IT is responsible for establishing an appropriate training program for those authorized to operate the video surveillance systems, including ensuring training on protection of privacy and confidentiality.

Control and access to records created through the video surveillance systems

Access to the video surveillance records shall be restricted to authorized persons only.

Video surveillance records will only be reviewed under the following conditions:

- As part of an investigation into an incident involving the safety or security of people, facilities, or assets.
- To provide law enforcement agencies with evidence related to an incident under police investigation.
- Providing evidence as required to protect the City of Woodstock's legal rights.
- Responding to a request for information under the Municipal Freedom of Information and Protection of Privacy Act.
- For training purposes.

Personal Requests for Information

An individual whose personal information has been collected by a Video Surveillance System has a right of access to his or her personal information under Section 36 of the Act.

All personal requests for information shall be made in writing and directed to the FOI Coordinator on the prescribed form. The form is available at cityofwoodstock.ca. Requests are subject to the requirements of MFIPPA.

Sufficient information shall be provided with the request (approximate date and time, the location, description of the incident), to enable an authorized employee of the City of Woodstock, upon reasonable effort, to identify the record.

Fees will be paid in accordance with those required through MFIPPA.

Public Requests for Access to Information

All requests for access to a record should be made in writing in the form of a letter or through the prescribed form to the FOI Coordinator under MFIPPA. The form is available at cityofwoodstock.ca.

Sufficient information shall be provided with the request (approximate date and time, the location, description of the incident), to enable an authorized employee of the City of Woodstock, upon reasonable effort, to identify the record.

Fees will be paid in accordance with those required through MFIPPA.

The FOI Coordinator will review the legal authority for each request and will forward information as required under MFIPPA.

Law Enforcement Agency Requests for Access to Information

If access to a video surveillance record is required for the purposes of a law enforcement investigation, such requests shall be made in writing to the FOI Coordinator.

The FOI Coordinator will review the request to determine whether disclosure will be granted.

If the FOI Coordinator permits disclosure, a copy of the released information will be provided to the FOI Coordinator for filing purposes.

Unauthorized access

Unauthorized access occurs when personal information is collected, retained, used, or disclosed in ways that are not in accordance with the provisions of the Act.

Any City Staff who become aware of unauthorized access shall immediately advise the FOI Coordinator. The FOI Coordinator will report the unauthorized access to any individual whose privacy was breached and will inform the Information and Privacy Commissioner's office.

The Director of IT will take all reasonable steps to recover the record and limit the record's exposure.

Records Retention

Any information that has not been viewed will be erased after 7 days in accordance with the City of Woodstock's Records Retention By-law.

Any videotapes that are viewed will be retained for one year from the date of use in accordance with Section 5 of Regulation 823 of MFIPPA.

Revision Date	Rev #	Particulars
August 14, 2025	1	Added City vehicles to policy