COMMUNITY LIVING DURHAM NORTH

ELECTRONIC SURVEILLANCE

Policy No: B-10 (Service Delivery)

Effective Date: January 15, 2010
Last Revision:
Last Review: July 21, 2026

Rationale:

To ensure that whenever electronic surveillance is in place, employees and supported people know that it is present and know its purpose.

Policy Statement:

Community Living Durham North will utilize electronic surveillance technology when it deems that such is necessary in order to protect the safety of supported people and employees, or in order to provide effective support and/or supervision, at reasonable cost. Only systems designed and installed by professionals specializing in the use of monitoring systems will be acquired and authorized for use.

In utilizing electronic surveillance, Management will be cognizant of people's expectations of privacy, whether or not these are based in law. Management will monitor decisions made by the federal privacy commissioner and by arbitrators in Ontario, and it will install surveillance only in situations where it believes that the tests applied by these authorities can be met.

All surveillance will be non-surreptitious. Its use will be contingent on the consent of supported people and their families, except in situations where the technology is at the core of the supports being provided, in which case people can request alternate modes of support in different locations. Staff will also be advised of the surveillance prior to working a shift in the location where surveillance is in place.

Management will establish procedures describing the different kinds of surveillance in use and stipulating in each case operational detail such as when cameras will be in "on mode," which persons will be authorized to view the recorded images, how recordings will be stored and how long they will be saved.

Approved by: Jamie Ross for the Board of Directors Date: December 4, 2009

COMMUNITY LIVING DURHAM NORTH

ELECTRONIC SURVEILLANCE

Procedure No: B-10-1	Effective Date:	October 31, 2010
Privacy Issues	Last Revision:	
	Last Review:	June 7, 2021

- For staff, the surveillance is non-surreptitious. All employees are made aware of the surveillance before they begin to work in the home. An information sheet / sign-off form (H-30) is provided to staff upon hire, or upon transfer to the home, and staff will acknowledge its receipt, in writing. Also, notification that surveillance is in place will be posted just inside the entrance to the home.

- In most locations, management can view live images remotely and can also access recently recorded images. However, it will do neither routinely, but only in response to a reported incident (for example, an *Incident Report* arising out of a behavioural episode, or an allegation made by either the supported person or by an employee). Typically, only directors and the appropriate manager(s) will be authorized to view images. However, where the trigger was a behavioural episode on the part of a supported person, and the reason for viewing the footage is strictly clinical or educational, then, with the prior consent of the supported person, and of any employee(s) captured on the recording, the footage may be shared with other members of the support team and with the consulting behaviouralist.

- Unless related to a reported incident (i.e. to an ongoing investigation), recordings will be kept only for the duration of a normal record/over-write cycle, which is approximately 21 days. If it is necessary to store (i.e. save) a recording, it will be backed-up onto a USB jump drive or DVD disk.

- Storage devices (i.e. recordings) will not be released to anyone else inside or outside the agency except, upon request, to police services.

Procedure No: B-10-2	Effective Date:	October 31, 2010
Exterior Surveillance	Last Revision:	July 21, 2026
	Last Review:	July 21, 2026

- Some homes with video equipment have cameras trained on the exterior of the home. The purpose and positioning of these cameras vary. Certain rural properties face an element of risk insofar as they do not have benefit of streetlights and emergency services will

generally take longer to respond. In this situation, a camera that looks down the driveway provides some small measure of protection to both staff and supported people. These images are not sent to the monitoring station. Indeed, these homes have on-site overnight staff who are themselves the users of the system.

- A second purpose for exterior cameras is, in some locations, to help staff safely monitor the movements of supported persons.

- A third function is to compensate for the absence of overnight staff in homes that do not have actual Overnight support staff. Here, the exterior cameras may be trained on windows and doors to help supported people refrain from engaging in certain dangerous behaviours.

- In the case of these homes without overnight support, electronic images are fed, at night, to a monitoring station and can be monitored (live) by an Awake night staff. At the time of writing, the monitoring is conducted by our Greenbank location. Union Avenue is equipped to assume this role upon short notice if Greenbank experiences technical difficulties.

- The monitoring of cameras by direct care personnel is the main purpose of external surveillance. Both, they and the supported people in the location, are made aware that the technology is in place.

Procedure No: B-10-3	Effective Date: October 31, 2010
Continuous Surveillance inside Janetville	Last Revision: June 7, 2021
	Last Review:

- Interior cameras are integral to the supports we provide at Janetville - both upstairs and down. One of the persons' family advocated for the installation of the surveillance. Downstairs, the use of A/V equipment has been recommended to us in view of the person's special needs. Both people receive one to one support which is inherently difficult to supervise. Because of this and other complicating factors, both employees and the people supported could be at risk.

- Upstairs, there is a single camera located in the living room. It is on at all times and live images can be viewed in the upstairs office, in the entrance way to the upstairs unit, and in the downstairs office. However, this must only be done for purposes of safety.

- The monitor in the entrance way to the upstairs unit kitchen can potentially be viewed by tradesmen or by anyone who visits that area of the home. Staff must protect people's privacy by turning off the monitor when guests are present.

- Downstairs, two interior cameras are operational 24/7 and their recording is continuous. Live monitoring from the office area is essential in the downstairs unit as it is not always safe for the person's support staff to be with him. There is an intercom system for communication.

- There is no feed from Janetville to the monitoring station(s).

Procedure No: B-10-4	Effective Date: October 31, 2010
Continuous Surveillance inside Mariposa	Last Revision: July 21, 2026
	Last Review: July 21, 2026

- The interior camera in Mariposa is in the main living area of the basement apartment. It feeds to a monitor in the upstairs kitchen as well as to a second monitor in the entranceway area leading into the downstairs apartment. There is a third monitor in the office that captures the external cameras. There is no audio component.

- The cameras are operational 24/7 and there is an intercom system to facilitate communication. Live monitoring is essential to properly support the supported person, and to ensure the safety of staff at all times.

- Mariposa's system has no recording capacity and cannot be used except in live mode. In its purpose, and in terms of the technology, it is much like a baby monitor. Its purpose is not to monitor the conduct of staff.

- The monitor in the kitchen can potentially be viewed by tradesmen or by anyone who visits that area of the home. Staff must protect people's privacy by turning off the monitor when guests are present.

- There is no feed from Mariposa to the monitoring station(s).

Procedure No: B-10-5	Effective Date: October 31, 2010
Continuous Surveillance inside Island Road	Last Revision: March 6, 2023
	Last Review:

- Upstairs, there are cameras located in the living room and in the kitchen. They are on at all times and live images can be viewed from the office that is located upstairs.

- Downstairs, there is a camera in the living room area. It is on at all times and live images can be viewed from the office that is located upstairs.

- There is no feed from Island Road to the monitoring station(s).

Procedure No: B-10-6	Effective Date: April 14, 2015
Continuous Surveillance inside Cochrane	Last Revision: July 21, 2026
	Last Review: July 21, 2026

- The interior camera in Cochrane is in the downstairs living area. It feeds to a monitor in the upstairs office where live images can be viewed. This monitor is always on; there is no audio component. Direct care staff cannot access recorded images.

- There is a feed from Cochrane to the Greenbank location that can be viewed, if necessary, only between 10 p.m. and 8 a.m. (see B-10-11 below).

- Should the people supported at Cochrane require assistance, they will use the Tele Bell system which automatically calls the Greenbank monitoring cell phone; staff can then speak directly to the supported person while viewing the live camera feed.

- Additionally, all doors are alarmed. Should a door be opened between 10 p.m. and 8 a.m., the monitoring station staff will be alerted via email. This will cue the Overnight Awake staff at Greenbank to view the cameras and use the Tele Bell system to speak with supported persons.

Procedure No: B-10-7	Effective Date: April 23, 2014
Continuous Surveillance inside Simcoe	Last Revision: November 30, 2019
	Last Review: June 7, 2021

- The interior cameras in Simcoe are in the main living area, kitchen and outside of the north hallway. They continuously record to a DVR located at Simcoe. There is no audio component at Simcoe and no feed to the monitoring station(s).

Procedure No: B-10-8	Effective Date: September 22, 2017
Continuous Surveillance inside the Home and to Provide Overnight Support - Hwy 7A	Last Revision: November 30, 2019
	Last Review: June 7, 2021

- The interior cameras in Hwy 7A are in the large downstairs and upstairs living areas. The downstairs camera feeds to a monitor in the upstairs kitchen. The cameras continuously

record to a DVR located at Hwy 7A. There is no audio component and its purpose is not to monitor the conduct of staff.

- The monitor is only turned on when required in order to view the downstairs living area and so they are unlikely to capture the image of support staff.

- The monitor in the kitchen can potentially be viewed by tradesmen or by anyone who visits that area of the home. Staff must protect people's privacy by turning off the monitor when guests are present.

- Hwy 7A has an overnight staff (on the lower level) but to guard against certain contingencies, the monitoring station will, as of 10 p.m., be able to monitor the main floor only. If monitoring is required, the camera will have to be plugged in.

- In the event that overnight staff are leaving the premises (because of an AWOL incident), they are to contact the monitoring station to advise them of their departure, and that the On-call Manager should be notified in the event of a further issue. Upon returning, the monitoring station must again be advised.

Procedure No: B-10-9	Effective Date: January 18, 2018
Continuous Surveillance inside Lakeridge	Last Revision: November 30, 2019
	Last Review: June 7, 2021

- The interior camera in Lakeridge is in the downstairs living area. The downstairs camera feeds to a monitor outside the entrance into the downstairs living area and the upstairs kitchen. The cameras continuously record to a DVR located at Lakeridge.

- The monitor is left on at all times, in order to view the downstairs living area and to monitor the support needs of the supported person and the safety of the staff.

- The monitor in the kitchen can potentially be viewed by tradesmen or by anyone who visits that area of the home. Staff must protect people's privacy by turning off the monitor when guests are present.

- There is no feed from Lakeridge Road to the monitoring station(s).

Procedure No: B-10-10	Effective Date:	April 29, 2019
Continuous Surveillance inside Alva	Last Revision:	July 22, 2026
	Last Review:	July 22, 2026

- The cameras at Alva are located at the exits and exterior. The purpose is to be able to identify visitors arriving in the driveway. The camera feeds to a monitor in the office downstairs but during the day this monitor is typically turned off.

- If the monitor is turned on, generally in the evening, it will only capture the image of support staff in the act of arriving or leaving.

- The cameras continuously record to a DVR at Alva so that images of unexpected visitors can be reviewed after the fact.

- There is no feed from Alva to the monitoring station(s).

Procedure No: B-10-11	Effective Date:	July 22, 2026
Continuous Surveillance inside Union	Last Revision:	
	Last Review:	

- Upstairs, there are cameras located in the living room and in the front entrance. Downstairs, there is a camera in the living room area.

- The cameras continuously record to a DVR located at Union. There is no audio component at Union and no feed to the monitoring station(s).

- There is no monitor present at the program location and no need to watch the cameras as a means of providing support to people.

Procedure No: B-10-12	Effective Date:	October 31, 2010
Surveillance Technology used for Overnight Support	Last Revision:	July 21,2026
	Last Review:	July 21, 2026

- This kind of surveillance is used in two homes (Victoria and Cochrane) as an alternative to having Overnight staff on site. It is appropriate for only certain people, with certain support needs.

- At Hwy 7A the surveillance system could be used for this purpose if overnight staff there were obliged to respond to some kind of emergency outside the home. Staff would need to notify the Overnight Awake staff at Greenbank and plug in the camera cord.

- Overnight surveillance at Victoria and Cochrane involves multiple cameras and the arming of the exterior doors.

- At Victoria and Cochrane, the system includes an independent Tele Bell device audio component that can be activated at any time, either by someone in the home that is monitored, or by staff at the monitoring station.

- Only common areas of the home will be monitored; cameras will not have a view of bedrooms or bathrooms. An exception to this is when supported people are experiencing high risk health issues that require intermittent and/or overnight monitoring, e.g. seizures. Individualized guidelines for this type of monitoring are described and documented in the supported person's *Support Information (Form B-10)*. Consents are provided annually on the *Annual Support Agreement (Form B-25)*.

- Supported people will be made aware that the cameras and recording devices are in place. It will be fully explained to them how the system works. In fact, each person will have an opportunity to visit the monitoring station, view the inside of their home on camera, talk to their housemates, etc.

- It is anticipated that supported people will feel that their privacy and their sense of ownership is improved by this system, in that the alternative is an Asleep staff installed on a couch or cot in their living room, or elsewhere in their house. However, supported persons may decide not to participate in this audio-video support system. In this case, they may elect to transfer into a group home that provides traditional overnight supports.

- When Greenbank (or it's backup, Union Avenue) turns off its system; no one there, obviously, will be able to see images arriving from Victoria or Cochrane. But to be clear, the technology in each of these homes continues to function and images continue to be recorded.

- Within the homes, live images can only be viewed when their monitors are on. This is "always" at Cochrane because of the nature of the support needs there. But it is "never" at Victoria where the monitors are to be left off at all times. The monitors at Victoria are strictly for the use of our IT Manager when it is necessary for her to deal with technical malfunctions. That said, if a complaint or some other situation compels management to review a tape, it may then be used as evidence in disciplinary proceedings. Similarly, access to recorded images will not be denied to investigating police services.

- At Victoria and Cochrane, the doors must be armed manually by entering a code into a keypad on the door. Staff will perform this task as they complete their shift. We keep house specific information on how to activate and deactivate the door alarms in the Program Information Binder.

- The electronic images are fed, at night, to the Greenbank monitoring station where they can be monitored by the Awake night staff if they are summoned to do so by the Tele Bell device. Although based at Greenbank (or at Union Avenue), this overnight staff (in

programmatic terms) will be considered a part of the support team at the two locations that are monitored in this way. They will have to know both sets of individuals and be familiar with all their Support Plans. Only in this way can they have a good sense of where risk lies, how to communicate effectively with each person, etc.

- If an armed door is opened, an email will be sent to the Greenbank monitoring email account and to the cell phone used by the overnight Awake staff at Greenbank. The staff will be required to acknowledge the message, which can be done with a simple key stroke.

- In most situations, the staff will be able to problem solve the issue, with the supported persons, or dissuade the supported person(s) from indulging in risky behavior, via the Tele Bell audio component of the system. When this is not possible, or when faced with a different kind of emergency, the staff will call the on-call manager and possibly also 911, if appropriate. Should the on-call manager not respond, the staff will proceed in accordance with B-15 *Emergency Response and Reporting System.*

- If the problem is technical in nature (e.g., the camera system is not working) then the first call will go to the back-up site, i.e., Union Avenue, which will then take over the monitoring function. The on-call Manager will be called only if imaging problems arise at both sites. On call Managers are equipped with back-up technology that will also receive the video feed.

- In the event of a power outage, both Greenbank and Union Avenue have a stand-alone generator and a battery pack with a 3 to 4-hour life span. -However, it will sometimes happen that the Cochrane, Victoria or Rogers (internet) itself loses power in which case our monitoring system will be temporarily down. The Tele Bell has its own dedicated phone line that will still allow for the operation of this system to work in a power outage.

Procedure No: B-10-13	Effective Date: October 31, 2010
General Matters	Last Revision: July 22, 2026
	Last Review: July 22, 2026

- In the event that allegations are made about a program that has surveillance technology, and the allegations point to a possible criminal offense, management will not view the tapes. Policy/procedure B-19-3 states that the agency will refer such matters to the police and not conduct a parallel investigation. However, CLDN may choose to investigate the occurrence, and view the tape, after the police investigation has been completed.

- The video systems are virtually maintenance free and group home staff are not required to learn about, or use, the software, or even to turn the systems on and off. Instructions on how to view recorded images, and even the remote used for this purpose, are intentionally kept off-site in order to better protect the privacy of all concerned.

- Any significant change in the nature of the equipment, or in the way it is to be used, will be discussed with the people supported, their families, and with our staff.

- Every employee assigned to work in a location where video is in place will have the system and its purpose explained to him or her. This very basic training will include specific reference to the rights of supported people and to the consent issues involved.

- The O/N Awake staff at Greenbank will receive a more in-depth training, and this training will of course be shared by any staff who might potentially fill in for them.

- In the event of a power outage, the internet will be down, and the Monitoring Station disabled. However, all the systems except Mariposa's have back-up battery packs (i.e., uninterrupted power supplies, or UPS). This will enable the internal systems, the cameras and monitors, to function. The battery packs have a life of three to four hours. As mentioned above, it may happen that Cochrane, Victoria or Rogers loses power and in this case our monitoring station will be temporarily incapacitated.

- The remaining strength of each battery pack will be monitored during the regular monthly compliance checks that are performed by an external contractor.

Approved by: Christine Robinson Date: July 22, 2026
Executive Director