

MUSLIM ASSOCIATION OF NEW BRUNSWICK

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SECURITY POLICY

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EFFECTIVE DATE: NOV 10, 2025

SECTION 1: VIDEO SURVEILLANCE SECURITY POLICY

1. PURPOSE AND SCOPE

This policy establishes guidelines for the use of video surveillance systems at MANB premises to ensure compliance with Canadian privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws.

2. LEGAL AUTHORITY AND COMPLIANCE

This policy complies with:

- a. Personal Information Protection and Electronic Documents Act (PIPEDA)
- b. New Brunswick Personal Health Information Privacy and Access Act
- c. Canadian Charter of Rights and Freedoms
- d. Criminal Code of Canada

3. OBJECTIVES

Camera surveillance systems are implemented solely for:

- a. Protection of persons and property
- b. Prevention of theft, vandalism, and unauthorized access
- c. Enhancement of facility security during events and activities
- d. Incident documentation for insurance and legal purposes

4. CAMERA PLACEMENT AND COVERAGE

a. Permitted Areas:

- i. Main entrances and Exits
- ii. Parking areas
- iii. Common areas (lobbies, hallways, halls, stairways)
- iv. Storage areas containing valuable items
- v. Exterior building perimeter

b. Prohibited Areas:

- i. Washrooms and changing areas
- ii. Private offices (without consent)
- iii. Areas where individuals have reasonable expectation of privacy

5. SIGNAGE AND NOTIFICATION

- a. **Prominent, clear signage** will be posted at all entrances to monitored areas
- b. Signs will be at eye level, clearly visible and readable from at least 3 meters distance and cannot be obscured by other signage or objects
- c. Signs must indicate camera surveillance is in operation
- d. Contact information for privacy inquiries will be provided

- e. All signage must be in clear and easy to understand language
- f. **Minimum sign content will at least include one of the following:**
 - i. "AUDIO/VIDEO (A/V) RECORDING IN PROGRESS / ENREGISTREMENT AUDIO/VIDEO (A/V) EN COURS"
 - ii. "BY ENTERING THIS AREA, YOU ACKNOWLEDGE AUDIO/VIDEO (A/V) RECORDING IS IN PROGRESS"

6. A/V DATA COLLECTION AND RETENTION

a. **Collection Principle:**

- i. Only collect A/V Data necessary for stated purposes

b. **Retention Period:**

- i. Standard footage: 30 days maximum
- ii. Incident-related footage: Up to 1 year or until resolution
- iii. Automatic deletion after retention period expires

c. **Criminal Code Compliance:**

Our A/V recording policy complies with Section 184 of the Criminal Code (interception of private communications) in view of the following points:

- i. **One-party consent rule:** At minimum, one party to any conversation must consent to recording
- ii. **Implied consent** may apply in clearly marked public areas with proper signage
- iii. **Private communications** in areas of reasonable privacy expectation require explicit consent

7. ACCESS AND DISCLOSURE

a. **Authorized Personnel:**

- i. MANB Board Chair and Board Members
- ii. IT administrator (technical access only)

b. **Enhanced Authorization for A/V Access:**

- i. **Board Chair AND one additional board member** approval required for A/V access
- ii. **Written justification** required for each A/V review request
- iii. **Legal consultation** recommended before releasing A/V to third parties

c. **Access Logs:**

- i. All access must be logged with date, time, and purpose
- ii. Regular review of access logs required

d. **Disclosure:**

- i. Only to law enforcement with proper warrant or court order
- ii. To insurance companies for legitimate claims
- iii. To individuals upon written request (subject to privacy laws)

8. TECHNICAL SAFEGUARDS

a. Security Measures (If A/V Recording System Permits):

- i. Encrypted storage and transmission
- ii. Password-protected access with multi-factor authentication
- iii. Regular security updates and patches
- iv. Secure, locked storage for recording equipment
- v. Network segregation from general IT systems

b. Backup and Recovery (If A/V Recording System Permits):

- i. Secure backup procedures
- ii. Regular testing of system integrity
- iii. Disaster recovery protocols

9. PRIVACY PROTECTION

a. Individual Rights:

- i. Right to access personal information
- ii. Right to request correction of inaccuracies
- iii. Right to file privacy complaints
- iv. Right to know how information is used

b. Privacy Impact Assessment:

- i. 3-year term review of surveillance practices
- ii. Assessment of privacy risks
- iii. Documentation of mitigation measures

10. MONITORING AND COMPLIANCE

a. Regular Reviews:

- i. Monthly system functionality checks
- ii. Quarterly privacy compliance audits
- iii. 3-year term policy review and updates
- iv. Board oversight and reporting

b. Incident Reporting:

- i. Immediate reporting of privacy breaches
- ii. Documentation of security incidents
- iii. Notification procedures as required by law

11. TRAINING AND AWARENESS

a. Staff Training:

- i. 3-year term privacy and security training
- ii. Proper system operation procedures
- iii. Incident response protocols
- iv. Privacy law compliance

b. Enhanced Training Requirements:

- i. **Annual Criminal Code training** on interception of private communications
- ii. **Consent procedures** for A/V recording situations
- iii. **Cultural sensitivity training** regarding religious privacy expectations

12. COMPLAINTS AND CONTACT INFORMATION

a. Privacy Officer Contact:

Muhammad Luqman

Muslim Association of New Brunswick

1100 Rothesay Road, Saint John, NB E2H 2H8

Phone: (506) 633-1675

Email: info@manb.ca

b. Complaint Process:

- i. Internal complaint to Privacy Officer
- ii. Provincial Privacy Commissioner (if unresolved)
- iii. Federal Privacy Commissioner (PIPEDA matters)

13. VIDEO SURVEILLANCE SECURITY POLICY REVIEW

This policy will be reviewed annually or when:

- a. Legal requirements change
- b. Technology upgrades occur
- c. Privacy incidents are reported
- d. Best practices evolve

SECTION II: KEY FOB SYSTEM ACCESS POLICY

1. PURPOSE

This policy establishes guidelines for the issuance, management, and use of electronic key fobs for accessing the MANB Masjid.

2. KEY FOB ELIGIBILITY AND APPLICATION

a. Eligibility:

- i. Must be **18 years of age or older** to be eligible to apply for a key fob
- ii. Must have a valid government issued photo-id to be eligible to apply for a key fob

b. Application for the Key Fob:

- i. Each applicant is eligible to receive **only one (1) key fob per person**

- ii. If multiple household members require facility access, each individual must submit a separate application
- iii. Applications must be completed in full and submitted to the MANB Office for approval. Please contact the office for further information on how to apply for the key fob.

c. Security Deposit

- i. A refundable security deposit of **\$20.00 CAD** is required at the time of key fob application
- ii. Payment must be made before the key fob is issued
- iii. The deposit is fully refundable upon return of the key fob in good working condition
- iv. Deposits will be returned within 30 days of key fob return

d. Key Fob Terms and Conditions

- i. Each key fob is active for a period of **twelve (12) months** from the date of registration
- ii. Key fob holders must contact the MANB Office prior to expiration to reactivate access for an additional year
- iii. Expired key fobs will be automatically deactivated and require renewal to restore access

3. SECURITY AND ACCESS MONITORING

- a. The electronic access system maintains a comprehensive log of all key fob usage
- b. Entry logs record the date, time, and identity of each person accessing the facility
- c. Access logs may be reviewed by MANB administration for security and facility management purposes

4. KEY FOB HOLDER RESPONSIBILITIES

- a. The safety and security of the issued key fob is solely the responsibility of the key holder
- b. Key fobs **must NOT** be lent, shared, or distributed to any other individual without prior permission from MANB administration
- c. Lost or stolen key fobs must be reported immediately to the MANB Office
- d. Replacement of lost or damaged key fobs will incur **a new deposit charge** in the amount of **\$20.00 CAD**
- e. The mosque doors must remain secured and locked at all times; access is permitted only to individuals with an authorized key fob
- f. Outside of congregational prayer times, individuals who do not possess a key fob must not request or be granted entry by others who have access. This is strictly prohibited under the security policy.
- g. During congregational prayer times, it is permissible for key fob holders to open the door for others who do not have access.

5. ACCESS PRIVILEGES

- a. Possession of a key fob grants the holder access to the Masjid for the purpose of **performing Salaat in congregation.**

- b. The key fob **does not** authorize access to other facilities for **private gatherings, events, or personal use**.
- c. Individuals wishing to use specific areas of the Masjid, such as meeting rooms, halls, or multipurpose spaces, must submit a separate facility booking request with MANB office.

6. POLICY VIOLATION AND RIGHT TO CANCEL AUTHORIZATION

a. Policy Violations

The following actions constitute violations of the Key Fob System Access Policy and may result in disciplinary measures, including revocation of access privileges:

- i. Failure to comply with any of the outlined rules may lead to the cancellation of key fob access.
- ii. Unauthorized sharing, duplication, or misuse of key fobs will result in immediate revocation of access privileges.
- iii. Individuals found in violation of this policy may be deemed ineligible for future key fob issuance.

b. Right to Cancel Authorization

MANB retains full authority to cancel key fob authorization at its sole discretion, without prior notice. This authority includes, but is not limited to, the following circumstances:

- i. Policy violations
- ii. Security concerns
- iii. Facility management requirements
- iv. Administrative decisions

In the event of cancellation:

- i. The security deposit will be refunded upon return of the key fob in good condition.
- ii. MANB is not obligated to provide justification for cancellation decisions.

SECTION III: SECURITY POLICY ENFORCEMENT & CANCELLATION RIGHTS

1. Enforcement

- a. All individuals accessing or operating within the premises are required to comply with the **Video Surveillance Security Policy** and **Key Fob System Access Policy**.
- b. Non-compliance may result in disciplinary action, restricted access, or legal consequences, depending on the severity of the violation.
- c. MANB reserves the right to monitor, audit, and investigate any activity related to security systems according to the stated policy to ensure adherence.

2. Cancellation and Amendment Rights

- a. MANB retains the right to amend, suspend, or cancel any part of this policy at its discretion, with or without prior notice.

- b. Any changes will be communicated through official channels and will take effect on the date specified in the notice.
- c. Users and key fob holders are responsible for staying informed about current policies and updates.

Effective Date: Nov 10, 2025

Next Review Date: Nov 1, 2027

Approved by: MANB Board of Directors

Document Control:

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- Created by: **Muhammad Luqman Khan Kureembokus**
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