

POLICY

It is the policy of the Board to support the use of video surveillance cameras in its schools, administrative sites and on school buses. Video surveillance can promote a secure environment while upholding the essential and legislated rights of privacy of individuals. Video surveillance is only one means by which the Board will ensure a safe and secure learning environment.

Administrative Detail

1. The purpose of video surveillance is to serve the security needs of the Board, not to infringe on anyone's right to privacy.
2. It is the responsibility of the Director of Education to administer this policy in conjunction with the Chief of Operations and Superintendents of Schools.
3. It is the responsibility of Principals, site managers and other designated and authorized Facilities Services staff to implement this policy and procedures.
4. Designated and authorized Board staff will be responsible for the use of the system equipment and the privacy obligations under the governing legislation.
5. This policy and procedures addresses the collection, use, disclosure, retention, disposal and access to information with respect to the Board's obligations under the legislation, and the day-to-day operation of video surveillance systems. This policy applies to situations where permanent video surveillance cameras have been placed on school property. It does not apply to specific school events, such as a graduation ceremony or where a classroom is videotaped for educational or research purposes.
6. Where cameras are used in school buses, the service provider (bus operator) will adhere to the procedures set out in this policy and procedures. In the case of buses shared with another school or school board, the approval of the sharing school or board will be obtained.
7. The use of video surveillance will be communicated to the school community and general public on a regular basis. Clearly written signage will be prominently placed at sites where video surveillance is used.

8. This policy operates in conjunction with the Video Surveillance Procedures Manual #203-A, the Education Act, the Municipal Freedom of Information and Protection of Privacy Act, and the Guidelines for Using Video Surveillance Cameras in Schools from the Information and Privacy Commissioner/Ontario (IPC December 2003 or most current version).
9. Additional reference should be made to the Police School Board Protocol, and Board policies #515 Expulsion of Pupils, #504 Suspension of Pupils, #104 Unauthorized Visitors, #206 Violence-Free Schools, #513 Drug and Alcohol, and #408 Anti-Harassment.
10. This policy will be reviewed every three (3) years.

A. VIDEO SURVEILLANCE - GENERAL

1. Video surveillance can help promote a safe and secure environment for members of the school community including students, staff, parents and visitors. It can act as a deterrent to protect against theft, vandalism and other destructive acts, and aid in the detection and identification of intruders and persons breaking the law.
2. All video surveillance activities undertaken by the Board will be in compliance with the Municipal Freedom of Information and Protection of Privacy Act.
3. The Board will maintain control and responsibility for its video surveillance systems at all times.

B. DEFINITIONS

(from Guidelines for Using Video Surveillance Cameras in Schools, Information and Privacy Commissioner/Ontario, December 2003)

1. **Personal Information** is defined as being 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. Any image on a video surveillance system that is clear enough to identify a person or the activities, in which he or she is engaged in, is "personal information" under the legislation.
2. **Record** is defined to mean any information, however recorded, whether in printed form, on film, by electronic means or otherwise, and includes: a photograph, a film, a microfilm, a videotape, a machine-readable record and a record that is capable of being produced from a machine-readable record.
3. **Video Surveillance System** refers to video, physical or other mechanical, electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals in school buildings, on school premises and school buses. It includes an audio device, thermal imaging technology or any other component associated with recording the image of an individual.

4. **Reception Equipment** refers to the equipment or device used to receive or record the personal information collected through a video surveillance system, including a camera or video monitor or any other video, audio, physical or other mechanical, electronic or digital device.
5. **Storage Device** refers to a videotape, computer disk or drive, CD-ROM, computer chip or other device used to store the recorded data of visual, audio or other images captured by a video surveillance system.

C. INSTALLATION AND OPERATIONAL REQUIREMENTS

1. Video surveillance cameras will only be installed in identified public areas where surveillance is deemed necessary.
2. The equipment will be installed to monitor only the areas requiring video surveillance and will not be directed to look through windows of adjacent buildings or onto adjacent property. All locations will be authorized by the Board.
3. Video surveillance cameras are prohibited in areas where students, staff and authorized visitors have a high expectation of privacy, including change rooms, washrooms and staff rooms.
4. The equipment will operate up to twenty-four (24) hours a day, seven (7) days a week within the system's capabilities and limitations.
5. Principals/site managers will work with Facilities Services staff to install and operate video surveillance equipment.
6. Video surveillance cameras will be adjusted only by operators authorized by the Facilities Services staff in consultation with the school principal/site manager.
7. Video monitors (reception equipment) will be located in a strictly controlled access area. Only authorized and designated personnel will have access to the reception equipment and area. Monitors will not be located in any area that allows for public viewing.
8. Clearly written signage which complies with the Municipal Freedom of Information and Protection of Privacy Act will be prominently displayed at

sites where video surveillance is used, including school buses to provide reasonable and adequate warning about the use of the system.

9. Principals/site managers/bus operators will provide, on request, information regarding the notification and personal information requirements under the legislation.
10. Principals will consult with the school community on the installation and location of video surveillance cameras, and will ensure that the school community is notified, on a regular basis, about the rationale for the use of the cameras.
11. Service Providers and their employees must comply with this policy and the relevant legislation in performing any duties and functions related to the video surveillance program. In cases where there is non-compliance with this policy or the legislation, the Board will consider this a breach of contract leading to penalties for the service provider.

D. USE, DISCLOSURE, RETENTION, SECURITY AND DISPOSAL

1. Information obtained through video surveillance will only be used for the purposes noted in this policy relating to the protection of staff, students, the public and property. This information could lead to discipline or consequences for individuals, or assist in the detection or deterrence of criminal activity and vandalism.
2. Video surveillance will not be used for monitoring staff performance.
3. All tapes or other storage devices that are not in use will be stored in a secure, locked location in a controlled access area. Each used storage device will be dated and labeled.
4. Access to storage devices will be limited to authorized, designated personnel only. A log will be kept that provides details of all access to, and use (viewing) of, the recorded material.
5. Only the Principal/site manager and a limited number of designated alternates may review the “real time” information.
6. The recorded information will be reviewed only when an incident has been reported or observed, or to investigate a potential crime.

7. The retention period for information that has not been viewed for law enforcement, school or public safety purposes will be not more than thirty (30) days.
8. Recorded information that has not been viewed will be routinely erased in a manner in which it cannot be reconstructed or retrieved.
9. When recorded information has been viewed for law enforcement, school or public safety devices, the materials will be retained for a minimum of one (1) year unless this time frame is reduced by way of a formal resolution of the Board, or requested by the individual whose image has been captured and viewed.
10. The storage devices required for evidentiary purposes will be stored and retained until requested by law enforcement authorities. A log will be kept and completed before any storage device is disclosed to the appropriate authorities. The log will indicate who took the storage device, under what authority, when this occurred, and if it will be returned or destroyed after use. This will be monitored regularly and strictly enforced.
11. Old storage devices will be disposed of securely and in such a manner that the personal information cannot be reconstructed or retrieved (shredded, burned, magnetically erased, or copied over).

E. ACCESS TO PERSONAL INFORMATION

1. Any individual whose personal information has been recorded by video surveillance has a right of access to his or her personal information. Access may be granted in whole or in part to the individual unless an exception applies under the legislation. The Director of Education or authorized designate may refuse access where disclosure would constitute an unjustified invasion of another individual's privacy. Access to an individual's own personal information may also depend on whether any exempt information can be severed from the record.
2. The Director of Education or authorized designate will rule on possible frivolous or vexatious requests under the provisions of the legislation.
3. Any inadvertent discloses of personal information and breach of the legislation will be reported by Principals/site managers to the Board's Freedom of Information Officer.

4. Training will be provided to address staff and service provider obligations under this policy and the legislation, as required.

F. AUDITS AND EVALUATION

1. The Board will ensure that the use and security of video surveillance equipment, and compliance with the policy, procedures and legislation is subject to regular audits. Any deficiencies or concerns will be addressed as soon as possible.
2. Staff and service providers will be notified that their activities are subject to these audits and they may be called upon to justify their surveillance interest in any given individual.
3. The Board will review and evaluate its video surveillance program, policies and procedures every three (3) years to ensure ongoing justification for the program.

G. COVERT SURVEILLANCE

1. Covert surveillance (hidden cameras, or cameras installed without notification) is highly privacy invasive and is not a standard practice of the Board.
2. Covert surveillance will be used only as a last resort in limited case-specific circumstances.
3. Any use of covert surveillance will be time limited.
4. Before using covert surveillance, a thorough assessment of the privacy impacts will be conducted. The assessment must include a rationale that ensures that covert surveillance is the only available option, and the benefits outweigh the violation of the privacy of individuals observed.
5. All requests for the use of covert surveillance will be made through the appropriate Superintendent and will be approved by the Director of Education.