

Administrative Procedures Manual	Administrative Procedure 181
	Video Surveillance of Facilities and Property
	APPROVED: September 1, 2013
Page 1 of 4	AMENDED/REVIEWED: September 2019
LEGAL REFERENCE:	Section 52, 53, 197, 222, 225 Education Act Freedom of Information and Protection of Privacy Act

Background

The protection of Division property and maintenance of the health, welfare and safety of the students and staff while on Division property are important functions. The monitoring of individuals who enter upon the school grounds or school property is a significant factor in maintaining order and discipline and in protecting students, staff, visitors and Division property. The Division recognizes the value of surveillance systems and monitoring activity on school property or on school grounds, and its use in the maintenance of order and discipline within the school setting. Accordingly, the Division authorizes the use of video surveillance practices, in accordance with procedures established herein.

Procedures

1. Camera Location, Operation and Control
 - 1.1 Division buildings and grounds may be equipped with video monitoring devices.
 - 1.2 Video surveillance may be placed in areas where:
 - 1.2.1 Surveillance has proved to be necessary as a result of prior property damages or related security incidents;
 - 1.2.2 Upon reasonable grounds, the surveillance will be deemed to be a viable deterrent;
 - 1.2.3 Student supervision is difficult.
 - 1.3 Cameras may be positioned in areas outside of school buildings where it is necessary to protect external assets or to provide for the personal safety of individuals on school grounds or premises.
 - 1.4 Surveillance cameras located internally shall not be directed to look through windows to areas outside the building, unless necessary to protect external assets or to ensure for the personal safety of patrons or employees. Cameras shall not be directed to look through the windows of adjacent buildings.
 - 1.5 Cameras shall not be used to monitor areas where the public has a reasonable expectation of privacy, including change rooms and washrooms.
 - 1.6 Only individuals authorized by the Facilities Manager or the site manager in accordance with this Administrative Procedure shall have access to video equipment, or be permitted to operate the controls.
 - 1.7 The Secretary-Treasurer shall be responsible to audit the use and security of surveillance cameras, including monitors and recording media, and to report utilization to the Superintendent.

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2. Notification

- 2.1 Signs advising users of the premises of video surveillance practices are to notify individuals of:
 - 2.1.1 The area in which surveillance is conducted;
 - 2.1.2 The specific purpose for the surveillance;
 - 2.1.3 Period of time during which surveillance is conducted;
 - 2.1.4 Who within the organization is responsible for conducting surveillance; and
 - 2.1.5 The contact person who can answer questions about the surveillance system, including an address or telephone number for contact purposes.
- 2.2 Students shall be informed at the beginning of each school year and as necessary during the school year, that the Division will be monitoring all activity which occurs at designated monitoring points throughout the school year, and as to the purpose for such monitoring practices.
- 2.3 All staff shall be made aware of the Division video surveillance procedures and practices.

3. Use of Video Recordings

- 3.1 A video recording of actions by students may be used by the Division or its administrators as evidence of any disciplinary action brought against any student arising out of the student's conduct in or about Division property.
- 3.2 Video recordings of students, staff, contractors or others may be reviewed or audited for the purposes of determining adherence to Division administrative procedures and school rules.
- 3.3 Video records may be monitored by staff on a random and non-random basis as is deemed necessary and prudent in order to ensure for the safety and security of students, staff, visitors and Division property, and adherence to school rules.
- 3.4 The Division may use video surveillance to detect or deter criminal offences which occur in view of the cameras.
- 3.5 Video recordings may be released to third parties or applicants in conformance with the provisions contained in the Freedom of Information and Protection of Privacy Act and any regulations or rules thereunder.
- 3.6 The Division or its administrators may use video surveillance and the resulting recordings for:
 - 3.6.1 Inquiries and proceedings relating to law enforcement;

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- 3.6.2 Inquiries and proceedings relating to Board policy or Division administrative procedure adherence;
 - 3.6.3 Deterrence; and
 - 3.6.4 Student discipline.
 - 3.7 The Division will not use video surveillance for other purposes unless expressly authorized by or under an Act of enactment.
4. Protection of Privacy and Disclosure
- 4.1 Security and Retention of Recordings
 - 4.1.1 All recordings not in use shall be securely stored in a locked receptacle.
 - 4.1.2 All recordings that have been used for the purpose of this Administrative Procedure shall be numbered, dated and retained according to the camera site.
 - 4.1.3 The individual responsible for enforcement of video monitoring practices must authorize access to all video records.
 - 4.1.4 A log shall be maintained of all episodes of access to, or use of recorded material.
 - 4.1.5 Retention
 - 4.1.5.1 Any and all records containing personal information which has been used to make a decision that directly affects an individual shall be retained for a minimum of one (1) year.
 - 4.1.5.2 All other records shall be retained for thirty (30) days.
 - 4.1.6 The individual designated as responsible for this Administrative Procedure shall ensure that a Recording Release Form ([Form 181-1 Recording Release Form](#)) is completed before disclosing recordings to appropriate authorities or third parties. Any such disclosure shall only be made in accordance with applicable legislation.
 - 4.1.7 The Recording Release Form 181-1 is to indicate the individual or organization who received the recording, the date of the occurrence or when and if the recording will be returned or destroyed by the authority or individual after use.
 - 4.2 Disposal and Destruction of Recordings
 - 4.2.1 All recordings shall be disposed of in a secure manner. Recordings shall be shredded, burned or degaussed.

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4.3 Video Monitors and Viewing

- 4.3.1 Only the Facilities Manager, site manager or individuals authorized by that officer, and members of the police shall have access to video monitors while they are in operation.
- 4.3.2 Video monitors are to be in controlled areas wherever possible.
- 4.3.3 Records are to be viewed on a need to know basis only, in such a manner as to avoid public viewing.

4.4 Disclosure

- 4.4.1 Recordings shall not be disclosed except in accordance with this Administrative Procedure.
- 4.4.2 Disclosure of video records shall be on a need to know basis, in order to comply with Division objectives, including the promotion of the safety and security of students, the protection of Division property, deterrence and the prevention of criminal activities and the enforcement of school rules.

5. Access to Personal Information

- 5.1 An individual who is the subject of video surveillance has the right to request access to the recording in accordance with the provisions contained under the Freedom of Information and Protection of Privacy Act.
- 5.2 Access in full or part may be refused on any one (1) of the grounds set out within the legislation.

6. Evaluation

- 6.1 The effectiveness of the video surveillance operations shall be reviewed on an annual basis by the Facilities Manager, with a report being prepared and presented to the Superintendent by September of each year.

7. Non-Application

- 7.1 These procedures do not apply to covert or overt surveillance cameras being used on behalf of the Division as a case specific investigation tool for law enforcement purposes, where there is statutory authority and/or the authority of a search warrant to conduct surveillance.