

Administrative Procedure 181

VIDEO SURVEILLANCE

Background

Maintenance of the health, welfare and safety of the students and staff while on Division property and the protection of Division property is an important function of the Division. 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 video 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.

The use of video surveillance practices in accordance with the procedures established herein is authorized.

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 surveillance has proven to be necessary as a result of prior property damages or related security incidents, and in areas where, upon reasonable grounds, the surveillance will be deemed to be a viable deterrent.
 - 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 may be directed to look through windows to areas outside the building, when necessary, to protect external assets or to ensure for the personal safety of patrons or employees. Cameras shall in no event be directed to look through the windows of adjacent non-Division 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 Principal, in accordance with this administrative procedure, shall have access to video monitors, or be permitted to operate the controls. If the Division proposes the use of digital data, this will raise different security, retention and destruction issues which need to be addressed.
 - 1.7 The Division FOIP Coordinator (Secretary Treasurer) shall be responsible to audit the use and security of surveillance cameras, including monitors and video data.

2. Notification

- 2.1 Signs advising users on 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 Hours during which surveillance is conducted.
 - 2.1.4 Who within the organization is responsible for conducting surveillance.
 - 2.1.5 The contact person who can answer questions about the surveillance system, including an address or telephone number for contract purposes.
- 2.2 The Principal shall inform students 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 The Principal shall inform all staff of the Division's 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 as evidence in 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 Board Policies, Division Administrative Procedures and school rules.
- 3.3 Video recordings may be monitored by Division personnel on a random and non-random basis as is deemed necessary and prudent in order to ensure 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 that occur in view of the cameras.
- 3.5 Video recordings may be released to third parties or applicants in confidence with the provisions contained in the Freedom of Information and Protection of Privacy Act of Alberta, and any rules or regulations there under.
- 3.6 The Division may use video surveillance and the resulting recordings for:
 - 3.6.1 Inquiries and proceedings relating to law enforcement.
 - 3.6.2 Research.
 - 3.6.3 Deterrence.
 - 3.6.4 Student discipline.
- 3.7 The Division shall not use video surveillance for any other purposes unless expressly authorized by or under an Act or enactment.

4. Management of Recordings

- 4.1 All digital records shall be securely maintained.
 - 4.1.1 A copy of all digital records that have been used for the purpose of this administrative procedure shall be numbered and dated and retained according to camera site.
 - 4.1.2 The individual responsible for enforcement of video monitoring practices must authorize access to all digital records.
 - 4.1.3 The Principal and FOIP Coordinator shall maintain a log of all episodes of access to, or use of recorded material.
- 4.2 Retention of Digital Records
 - 4.2.1 Any and all records containing personal information which have been used to make a decision that directly affects an individual shall be retained for a minimum of one (1) year.
 - 4.2.2 All other records will be maintained for a period of six (6) days, after which they will automatically be overwritten with current records.
- 4.3 Release of Digital Records
 - 4.3.1 The Division's FOIP Coordinator shall ensure that a digital record release form is completed before disclosing digital records to appropriate authorities or third parties. Any such disclosure shall only be made in accordance with applicable legislation.
 - 4.3.2 The digital record release form is to indicate the individual or organization who took the digital record, the date of the occurrence or when and if the digital record will be returned or destroyed by the authority or individual after use.
- 4.4 Disposal and Destruction of Recordings
 - 4.4.1 All retained recordings shall be disposed of in a secure manner.
 - 4.4.2 Tapes shall be shredded, burned or taped over.

5. Video Monitors and Viewing

- 5.1 Only the Division's FOIP Coordinator, Principal or designate, and members of the police shall have access to live video monitors while they are in operation.
- 5.2 Live video monitors are to be in controlled access areas wherever possible.
- 5.3 Viewing of live video on video monitors in a building under video surveillance will be restricted to building personnel for the purpose of monitoring on-going activities.
 - 5.3.1 If members of the public are in proximity to a live video monitor for an extended period of time, building personnel are expected to disable the video signal for that time period.
- 5.4 Video records are to be viewed on a need to know basis only, in such a manner as to avoid public viewing.

6. Disclosure

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

7. Access to Personal Information

- 7.1 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.
- 7.2 Access in full or part may be refused on one (1) of the grounds set out within the legislation.

8. Consultation

- 8.1 The effectiveness of the video surveillance operations shall be reviewed on, at minimum, an annual basis by the FOIP Coordinator.
- 8.2 The results of the review are to be documented and any concerns addressed with the Superintendent.

9. Non-Application

- 9.1 These Administrative Procedures do not apply to covert or overt surveillance cameras being used by or 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 the surveillance.

Reference: Section 52, 53, 197, 222, 225 Education Act
Freedom of Information and Protection of Privacy Act