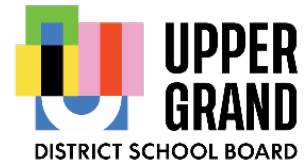


Video Surveillance Procedures Manual 203-A



Category:	Administration
Administered by:	Senior Administrator Responsible for Operations
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1. General

These procedures address the collection, use, disclosure, retention, disposal and access to video surveillance footage with respect to the board's obligations under the legislation. They also deal with the day-to-day operation of the board's video surveillance systems.

2. Definitions

(Adapted from the *Guidelines for the Use of Video Surveillance*, Information and Privacy Commissioner of Ontario, October 2015.)

Personal Information

In this policy and procedures, personal information means 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, age and disabilities. Any image on a video surveillance system that is clear enough to identify a person or the activities in which they are engaged in is "personal information" under the legislation.

Record

In this policy and procedures, record means any information, however recorded, whether in printed form, on film, by electronic means or otherwise, and includes: a photograph, a film, microfilm, a videotape, a machine readable record and a record that is capable of being produced from a machine readable record.

Video Surveillance System

In this policy and procedures, 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 board buildings, on school board premises and school

buses. It includes audio devices, thermal imaging technology or any other component associated with recording the image of an individual.

Reception Equipment

In this policy and procedures, reception equipment means 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 mechanical, electronic or digital device.

Storage Device

In this policy and procedures, storage device refers to a video tape, computer disc 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.

3. Installation and Operational Requirements

- 3.1 Video surveillance cameras will only be installed in identified public areas where video surveillance is deemed necessary.
- 3.2 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.
- 3.3 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.
- 3.4 The equipment will operate up to twenty-four (24) hours, seven (7) days a week within the system's capabilities and limitations.
- 3.5 Principals, site managers and/or designates will work only with authorized board staff to install and operate video surveillance equipment.
- 3.6 Video surveillance cameras will be adjusted only by personnel sanctioned by authorized board staff in consultation with principals, site managers and/or designates.
- 3.7 Video monitors (reception equipment) will be located in a strictly controlled access area. Only authorized and designated staff will have access to the

reception equipment and area. Monitors will not be located in any area that allows public viewing.

- 3.8 Clearly written signage which complies with the [*Municipal Freedom of Information and Protection of Privacy Act*](#) (MFIPPA) 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.
- 3.9 Principals will ensure that the school community is notified on an annual basis, or more frequently as needed, about the rationale for the use of the cameras.
- 3.10 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.

4. Use, Disclosure, Retention, Security and Disposal

- 4.1 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.
- 4.2 Video surveillance will not be used for real-time monitoring of staff performance.
- 4.3 Only the principal, site manager and a limited number of designated alternates may review the real-time information and/or have access to storage devices. All access will follow best practices for password security, complexity and changes.
- 4.4 Access to real-time and/or recorded information may be given to law enforcement to aid in an investigation. Such access will require a formal, written request to be made using the Request for Disclosure of Personal Information to Law Enforcement form, submitted to the appropriate supervisor.

- 4.5 The principal, site manager and/or designated alternate must keep a log at each site that provides details of all access to and use (viewing) of the recorded materials (See Appendix A for the log).
- 4.6 The recorded information will be reviewed only when an incident has been reported or observed, or to investigate a potential crime.
- 4.7 Recorded information that has not been viewed for law enforcement, school or public safety purposes will have a retention of 15 days.
- 4.8 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 physically or electronically date stamped with the date it was created.
- 4.9 Recorded information that has not been viewed will be routinely erased in a manner in which it cannot be reconstructed or retrieved.
- 4.10 Any record that has been downloaded and saved for law enforcement, school or public safety, will be retained for a minimum of one (1) year unless this time frame is reduced by way of a formal request by the individual whose image has been captured and viewed, and that request is approved by the Director of Education.
- 4.11 A written record will be kept and completed before any video footage is disclosed or shared to the appropriate authorities or third party. Notes will indicate who received the footage, under what authority, when this occurred, and if or how it will be destroyed after use. When possible, shared files will be password protected.
- 4.12 Old storage devices will be disposed of securely and in such a manner that the personal information cannot be reconstructed or retrieved (e.g., shredded, burned, magnetically erased or copied over).

5. Access to Personal Information

- 5.1 Any individual whose personal information has been recorded by video surveillance has a right of access to their personal information, in accordance with MFIPPA, using a formal [Freedom of Information Request for Information Form](#). Access may be granted in whole or in part to the individual unless an exception is applied under the MFIPPA legislation (i.e. 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.

- 5.2 The Director of Education or authorized designate will rule on possible frivolous or vexatious requests under the provisions of the legislation.
- 5.3 Any inadvertent disclosures of personal information and breach of the legislation will be reported by principals/site managers to the board's Freedom of Information Coordinator.
- 5.4 Training will be provided to address staff and service provider obligations under this policy and legislation, as required.

6. Audits and Evaluation

- 6.1 The board will ensure that the use and security of video surveillance equipment, and compliance with the policy, procedures and legislation is subject to annual audits. Any deficiencies or concerns will be addressed as soon as possible.
- 6.2 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.

7. Covert Surveillance

- 7.1 Covert surveillance (hidden cameras or cameras installed without notification) is highly privacy invasive and is not a standard practice of the board.
- 7.2 Covert surveillance will be used only as a last resort in limited case-specific circumstances.
- 7.3 Any use of covert surveillance will be time limited.
- 7.4 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.

- 7.5 All requests for the use of covert surveillance will be made through the appropriate superintendent or senior administrator and must be approved by the Director of Education before proceeding.

8. Cameras on School Buses

- 8.1 The installation and operation of cameras on school buses are carried out in accordance with [Policy 37 of the Service de transport de Wellington-Dufferin Student Transportation Services \(STWDSTS\)](#).
- 8.2 The use, disclosure, retention, security and disposal of recorded information from school buses is in accordance with privacy legislation and guidelines, and [STWDSTS Policy 37](#).