

AP 181 – VIDEO SURVEILLANCE

Background

The Division has a responsibility to protect Division property and to act proactively in the prevention of acts of destruction, theft or vandalism.

For reasons of safety for students, employees and others, as well as deterring destructive acts, the Division authorizes the use of video surveillance equipment on Division property, where circumstances have shown that it is necessary for these purposes and the benefit outweighs the impact on the privacy of those observed. Use is to be limited and only authorized after a thorough analysis of the considerations involved.

The Division recognizes both its legal obligation to provide appropriate levels of supervision in the interests of student safety and the fact that students have privacy rights that may be affected but not eliminated while under the supervision of the school. A digital recording is recognized to be subject to the provisions of the Local Authority Freedom of Information and Protection of Privacy Act.

Procedures

1. The Principal and the Chief Financial Officer are responsible for ensuring that student privacy is respected when sites for video surveillance equipment are selected. Video surveillance should not monitor areas where students, employees and public have a reasonable expectation of privacy, such as locker rooms and bathrooms.
2. Locations of installed Video Surveillance - The Director of Education or designate may authorize the installation of video surveillance cameras on school division property, including:
 - 2.1 schools and division owned facilities, and
 - 2.2 school buses or other vehicles owned, contracted, or operated by the Board of Education.
3. The Principal of the school shall annually notify students and parents that video surveillance is used on school property. Such notification may include, but not be limited to, newsletter, agendas, School Community Council meetings, or other communication devices and venues. Notification of video surveillance shall be visibly and internally posted on all buses used for student transportation.
4. The Principal of the school shall provide rental groups with AP547 Rental or Lease of Division Property/Facilities and Related Partnerships indicating that video surveillance is used on school property. Such notification will be included in the facility rental agreement.
5. Video recordings should only be reviewed where there is a need to do so, either because of an incident that occurred or has been suspected of occurring and only under the direction of the Principal or designated Vice-principal.

6. Video recordings may become part of a student's school record in the same manner any written evidence becomes part of a student's school record, at the discretion of the Principal and subject to all provincial and federal legislation.
7. Location of Viewing Equipment - A monitor or other recording media format used to view video records must not be located in a position that enables viewing by the public or unauthorized persons.
8. Identification and Security of Recordings - Video records shall be securely stored on the school division server where unauthorized personnel and pupils do not have access. All retained recordings shall be identified by date, and by the security camera location.
9. Access to Video Surveillance Equipment - Only employees or contractors of the Board designated by a Senior Administrator will install video surveillance cameras. Only employees or contractors designated by a senior administrator will be permitted to have access to video surveillance cameras, its controls, and associated equipment.
10. Student, staff or community use of any device including but not limited to smart phones, tablets, video or audio recorders for surveillance is not permitted or authorized.
11. Administrative Review and Use of Recordings:
 - 11.1 School division administrators and Transportation Supervisor with access to video surveillance cameras may only view recordings, if it is necessary for them to perform their duties.
 - 11.2 Video records will be subject to review only where a specific incident has been reported or observed, or to investigate a potential crime, legal claim, or breach of Board of Education Policy and/or Administrative Procedures.
 - 11.3 Video surveillance shall not be used for the sole purpose of monitoring staff performance, but the employer does have the right to address performance issues captured incidentally through footage.
 - 11.4 Real-time or live video monitoring can be conducted on Lloydminster Catholic School Division property when the immediate safety of staff and pupils is threatened. The school principal or Transportation Supervisor shall inform the Director of Education or designate of the purpose of the monitoring.
 - 11.5 A designated employee or contractor who is responsible for the technical operations of the video surveillance system may have access to recordings for technical purposes only.
 - 11.6 School Division administration may use a video record as evidence in any disciplinary action brought against a pupil arising out of that pupil's conduct in or about Board or school property or its transportation services.
 - 11.7 School Division administration may use video surveillance recordings for any other purpose expressly authorized by the Local Authority Freedom of Information and Protection of Privacy Act or any other applicable legislation.
12. Disclosure of Recordings to Third Parties
 - 12.1 The Director or designate must approve the disclosure of video records to third parties and inform the respective operational Deputy Director or CFO.

- 12.2 Video records shall not be disclosed to third parties except in accordance with the Local Authority Freedom of Information and Protection of Privacy Act and this administrative procedure.
 - 12.3 Disclosure of video records shall be on a need-to-know basis including the promotion of the safety and security of pupils, staff, and protection of Board property, deterrence, and the prevention of criminal activities and the enforcement of school rules.
 - 12.4 If a video record may provide evidence in relation to a potential legal claim against the Board of Education, the recording or a copy may be forwarded to the Board of Education's insurers.
 - 12.5 Video records that may provide evidence of a crime may be disclosed to a law enforcement agency where permitted by the Local Authority Freedom of Information and Protection of Privacy Act.
13. Maintenance of Logs - A log, maintained and retained by the Chief Financial Officer, shall be updated each time a video recording has been disclosed to a third-party entity.
14. Video recordings will be stored for a minimum of five (5) school days after initial recording, where upon if the Principal or designate know no reason for continued storage, such recordings will be stored for no more than thirty one (31) days.
15. Retention of Records Requests to retain video must be approved by the Director or designate.
- 15.1 Video records shall be deleted within three months unless they are being retained as part of an ongoing investigation.
 - 15.2 Retained video recordings will be kept to a maximum of 10 years.

Reference: Sections 85, 87, 108, 109 Education Act
Local Authority Freedom of Information and Protection of Privacy Act