

## Administrative Procedure 355

---

# VIDEO SURVEILLANCE

### Background

The maintenance of the health, welfare and safety of the students and staff while on Board property and the protection of the Board property are important functions of the Board. 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 Board property. The Board 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. In compliance with the recommendations of the Freedom of Information and Protection of Privacy (FOIPP) Act, surveillance cameras should be used only where conventional means for achieving the same objectives are substantially less effective than surveillance and the benefits of surveillance substantially outweigh any reduction of privacy in the existence and the use of the system.

### Definitions

***“Personal Information”*** is defined by section 1(n) of the FOIPP Act as “recorded information about an identifiable individual.”

***“Surveillance System”*** refers to a mechanical or electronic system or devices that enables continuous or periodic video recording, observing or monitoring of personal information about individuals in open, public spaces, public buildings, or public transportation.

***“Reception Equipment”*** refers to the equipment or device used to receive or record the personal information collected through a public surveillance system, including a camera or video monitor.

***“Record”*** is defined in section 1 (q) of the FOIPP Act as a record of information in any form and includes notes, images, audio-visual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner.

***“Storage Device”*** refers to a videotape, computer disk or drive, CD ROM or computer chip used to store the recorded visual images captured by a surveillance system.

## Value and Core Commitment Link

“All God’s Children”

– “Our schools provide a welcoming safe and accepting sanctuary.”

“Stewardship”

- “We ensure that decisions are both fact and Policy-based.”
- “We support and provide processes which promote fair and objective decision-making.”
- “We are accountable to our supporters and will operate in a fiscally responsible manner.”

## Guidelines

### Location, Operation and Control of Reception and Storage Surveillance Devices

1. The Superintendent of Schools, after consultation with the Principal and school council, may equip school jurisdiction buildings and grounds with recording devices for monitoring individual behaviour.
  - 1.1 Costs for surveillance in a school shall be the responsibility of the school budget.
2. Surveillance may be placed in areas where it has been deemed necessary as a result of prior property damages or related security incidents, and in areas where recording and storage surveillance devices are deemed to be a viable deterrent to such activities; i.e. classrooms, computer labs, CTS rooms, gym storage facilities, etc.
3. Any school recommending the use of a surveillance system will prepare, in writing, a Privacy Impact Assessment, as recommended by the FOIPP Act, to assist the division with its analysis of the need for surveillance. Privacy Impact Assessments can be accessed in the Administrative Procedures Forms section of the Holy Spirit Website, or via the website of the Office of the Information and Privacy Commissioner at [www.oipc.ab.ca](http://www.oipc.ab.ca). The Privacy Impact Assessment should include:
  - 3.1 The rationale for the collection of personal information through the use of a surveillance system, including;
    - 3.1.1 A review of best practices used by other schools in this and other school jurisdictions to handle similar issues and concerns;
    - 3.1.2 Details regarding less privacy intrusive practices that the school has already utilized to decrease undesirable activities, and an evaluation of why these practices have been ineffective, thus making a surveillance system a feasible alternative.
  - 3.2 How recorded information will be used and disclosed;
  - 3.3 How recorded information will be secured;
  - 3.4 How recorded information will be disposed.

4. The prepared Privacy Impact Assessment will be provided to the Superintendent of Schools for approval. The Superintendent will approve or not approve requests on the basis of the request achieving the stated goal that safety and security cannot be accomplished by other means.
5. Reception equipment in areas outside of school buildings shall only be positioned where it is necessary to protect external assets or to provide for the personal safety of individuals on school grounds or premises.
6. Reception equipment 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. Devices shall in no event be directed to look through the windows of adjacent buildings.
7. Reception equipment shall not be used to monitor areas where the public has a reasonable expectation of privacy, including change rooms and washrooms.
8. Only individuals authorized by the school Principal in accordance with this Policy, shall have access to the surveillance system, or be permitted to operate the controls.
9. The FOIPP Coordinator shall be responsible to audit the use and security of the surveillance system.

## Procedures

1. Notification
  - 1.1. Signs shall be placed in highly visible locations at or near where surveillance will occur, in addition to signage at school entrances. Signs shall include:
    - 1.1.1 A statement as to the purpose of the surveillance;
    - 1.1.2 Contact information of an employee who can answer an individual's questions regarding the collection of the personal information, pursuant to *Administrative Procedure 115: Freedom of Information and Protection of Privacy*. The contact person for this procedure will be the Principal of the school.
  - 1.2. Students shall be informed at the beginning of each school year, and as necessary during the school year, that the school district will be monitoring all activity, which occurs at designated monitoring points throughout the school year, and as to the purpose for such monitoring practices. Information regarding video surveillance will be included in the Student Handbook, and will be made accessible to students, school council, and the greater parent community on an annual basis.
  - 1.3. All staff and students shall be made aware of the content of this Administrative Procedure.
  - 1.4. It shall be the responsibility of the Principal to notify the school council and parents of surveillance practices.

## 2. Use of Storage Device

- 2.1. A recording of actions by students may be used by the Board or administrators as evidence in any disciplinary action brought against any student, arising out of their student's conduct in or about Board property.
- 2.2. The records may be monitored by authorized personnel on a random and non-random basis and as deemed necessary and prudent in order to ensure for the safety and security of the students, staff, visitors, and Board property and for adherence to school rules.
- 2.3. Records may be released to third parties or applicants in conformance with the provisions contained in Section 40 of the Freedom of Information and Protection of Privacy Act of Alberta and any rules or regulations contained there under (See APPENDIX "A").
- 2.4. The Board may use a surveillance system to detect criminal offences, which occur in view of reception equipment.
- 2.5. The Board or its administrator may use surveillance for:
  - 2.5.1. deterring where vandalism, theft, bullying or any other inappropriate behavior is or could be a concern;
  - 2.5.2. student discipline and property protection;
  - 2.5.3. inquiries and proceedings relating to law enforcement.
- 2.6. The Board shall not use the surveillance system for other purposes unless expressly authorized by or under an Act or under an enactment.

## Protection of Information and Disclosure

### 3. Security and Retention of Storage Device Formats

- 3.1. All storage devices not in use shall be securely stored in a locked receptacle.
- 3.2. All storage devices that have been used for the purpose of this Policy shall be numbered and dated and retained according to camera site.
- 3.3. The Principal must authorize access to all storage devices.
- 3.4. A standard log shall be maintained of all episodes of access to, or use of the recorded material.
- 3.5. Information shall be retained as per the established schedule of the surveillance equipment, but not longer than thirty days, and then destroyed as per 4.1. However, personal information that has been used to make a decision that directly affects an individual will be retained for a minimum of one year from the date of such use.
- 3.6. The Holy Spirit School Division shall ensure that a release form is completed before disclosing storage device formats to appropriate authorities or third parties. Any such disclosure shall only be made in accordance with applicable legislation. A release form should indicate the

individual or organization who took the storage device, the date of the occurrence, or when and if the device will be returned or destroyed by the authority or individual after use.

- 3.7. Access to storage devices shall be provided to Board employees, or agents only in accordance with Section 40 of the FOIPP Act.
4. Disposal and Destruction of Recordings
  - 4.1. All recordings shall be disposed of in a secure manner. Tapes or other visual storage formats should be shredded, burned or degaussed under the direction of the Principal.
5. Monitors and Viewing
  - 5.1. Only the controlling officer or individuals authorized by that officer and members of the police shall have access to monitors while they are in operation. When students are suspected of breaking the law, the Principal will cooperate with the police in accordance with *Administrative Procedure 320: Interrogation of Students*.
  - 5.2. Monitors should be in controlled access areas wherever possible.
  - 5.3. Records should be viewed only in accordance with Section 40 of the FOIPP Act, and in such a manner as to avoid public viewing.
6. Disclosure
  - 6.1. Recordings shall not be disclosed except in accordance with this procedure. Disclosure of records shall be produced in accordance with Section 40 of the FOIPP Act, and shall comply with the Board's Policy objectives, including the promotion of the safety and security of students, the protection of Board property, and addressing the 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 FOIPP Act. Access in full or part may be refused on one of the grounds set out within the legislation.
  - 7.2. Reasonable efforts will be made to protect the personal information of other individuals who may also be recorded.