

Policy Statement: The Western School District supports the use of video security systems in schools, when deemed necessary by the Director (or designate), for the safety and security of students, staff, visitors and property. Video security usage shall be balanced with privacy rights in accordance with the *Access to Information and Protection of Privacy Act*.

1. Application

Any property or building owned, operated or under contract by the Western School District, including vehicles.

2. Rationale

Video security systems support the District's Safe and Caring Schools' policy and practices. Video security systems can be a powerful tool, when combined with other measures, to promote safety and protect users of our educational facilities. Video security may reduce bullying behavior, prevent or reduce theft and vandalism within schools, and provide a means to hold individuals accountable for criminal or unbecoming conduct while on school property.

3. Procedures

3.1 Approval and Purchase

- a) School administrators and/or the Manager of Pupil Transportation wishing to install a video security system shall submit a Video Security Request to the Education Officer responsible for Student Support Services. This report shall include the following information:
 - i. Problem definition with evidence supporting the need for video security. Identify all methods used to address the problem before making the request.
 - ii. Proposed location of cameras based on identified need and proposed hours of operation based on high risk periods.
 - iii. A financial sustainability plan indicating proposed sources of funding for purchase, installation and maintenance/upgrades of systems. Schools will normally be solely responsible for all costs associated with video security systems.
 - iv. Process used to gauge school council and school community support, and the level of support.

- b) The Education Officer for Student Support Services shall review Video Security Requests and make recommendations on approval to the Director (or designate), based on need.
- c) The Senior Administrative Officer shall review Video Security Requests recommended for approval for *ATIPPA* compliance and make recommendations to the Director (or designate) based on compliance.
- d) The Director (or designate) must grant permission to applicants before a video security system may be installed within/upon Western School District properties. The Director (or designate) shall also approve specific locations for security cameras. If an application is rejected, this does not preclude the applicant bringing forth a new application if there is a change in circumstance.
- e) If approved, the school administration shall abide by the *Public Tender Act* when purchasing goods and services. Administrators shall consult with the Purchasing Manager to ensure compliance requirements are met, based on the total costs of camera purchase and installation.
- f) The Director (or designate) may conduct audits of video security systems to ensure compliance and review necessity. Based on this review, the Director (or designate) may order the removal of video security systems if usage is deemed no longer necessary or appropriate.

3.2 Notice and Installation

- a) Upon approval to utilize video security, principals shall ensure appropriate notification to employees, students and parents by ensuring that signage is posted at entrances and each camera location, advising that video security is/may be in use.
- b) Written notice shall be provided to employees, parents of students attending the school, and school council members that a video system is approved for use, noting the expected date of operation. Subsequently, at the beginning of each school year, notice is to be given to parents and the school council, using normal methods of communication (e.g., newsletters, school website). For bussing, the Principal shall notify the parents of children using the bus that cameras are installed on the bus.
- c) Installation of video systems shall only be completed by qualified District staff or through the vendor.
 - i. Cameras shall not be located in change rooms, washrooms, or other similar areas in which there is an expectation of privacy.
 - ii. Cameras are not to be directed towards adjacent properties.

3.3 Access and Storage

- a) Access shall normally be limited to school administrators (or designates) and relevant District staff. Records shall be maintained in a secure area with restricted access. Normally, this would be the office of the Principal, Vice-Principal, or Manager of Pupil Transportation (or designate). All recordings must be clearly labeled and dated.
 - i. An individual may make application to access a video record of which they are the subject under *Access to Information and Protection of Privacy Act*. Access will not be granted to records deemed as evidence in criminal investigations or that would be deemed in violation of another individual's privacy rights, and/or deemed to be protected under the *Access to Information and Protection of Privacy Act*.
 - ii. Records shall be maintained documenting who views a video, including the name of the reviewer and position, date and time. This record shall be maintained in a locked filing cabinet in the office of the video custodian.

3.4 Use and Disposal

- a) Video records may be used as evidence in disciplinary actions against students, employees or volunteers, for law enforcement/legal proceedings, and/or approved research.
- b) Video recordings shall be destroyed in a manner rendering the data unable to be viewed following an acceptable industry method of destruction, such as overwriting or shredding.
- c) Video records shall be destroyed at the end of every school year, with the exception of when used in matters involving disciplinary or criminal proceedings. In such matters, video records shall be maintained for one year following the conclusion of the matter, and may therefore, be maintained beyond the end of the school year.

4. References

Guidelines for Using Video Security Cameras in Schools, Information and Privacy Commissioner of Ontario, July 2009

Access to Information and Protection of Privacy Act, NL, Sections 32(c), 40(b). School's Act 1997, NL, Sections 24(1)(d), 75(1)(e).

Guidelines for Video Security by Public Bodies in Newfoundland and Labrador, Office of the Information and Privacy Commissioner for Newfoundland and Labrador, May 2005.

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