

BUSINESS – SCHOOL OPERATIONS

Video Surveillance System

1.0 GENERAL

- 1.1 The Durham District School Board is committed through shared responsibilities and continuous improvement to provide a secure, healthy and safe environment for its staff and students. Video surveillance systems complement, not replace, other means used to foster this safe and secure learning environment. In addition, the Board recognizes that enhancing safety and security through the use of video surveillance must be balanced against the privacy rights of staff, students, volunteers and the general public.
- 1.2 District School Boards in Ontario are governed by The Municipal Freedom of Information and Protection of Privacy Act (the Act). This Act imposes privacy protection obligations on institutions with respect to the collection, use, disclosure retention, security and disposal of personal information. The Information and Privacy Commissioner/Ontario recognizes that "a school board is lawfully authorized to operate a school board under the Education Act and, in doing so, it must take reasonable steps to ensure the safety and security of students and property."¹

2.0 APPLICABILITY OF GUIDELINES

- 2.1 These guidelines apply to school board facilities where permanent video surveillance cameras are in place. The guidelines do not apply to the videotaping of a specific event (e.g. school fun fair) or to covert surveillance.

3.0 PLANNING CONSIDERATIONS AND APPROVAL

- 3.1 Before acquisition, installation and operation of a video surveillance system the school board facility shall submit for approval to the Area Superintendent, an assessment justifying the use of the system. This assessment shall identify the problem that is to be addressed and explain how it is real, substantial and pressing, demonstrate that other less intrusive means of achieving the goals of safety and security have been considered and are either less effective than the video surveillance or are not feasible, and document that the benefits of a video surveillance system outweighs the reduction in privacy.
- 3.2 Appendix 1 contains an assessment form to facilitate 3.1.
- 3.3 The school board facility shall consult with parents, staff, and students as part of this assessment. The consultation shall include an opportunity for the school community to discuss the proposed cameras.

4.0 DESIGN, INSTALLATION AND MAINTENANCE

- 4.1 Video cameras shall only be installed in public areas such as the building exterior or interior hallways. Cameras shall not be installed in areas of higher expectations of privacy (e.g. change rooms, washrooms, private conference/meeting rooms). The video cameras shall not be adjusted or manipulated in such a way that information from areas that have higher expectations of privacy may be collected by using functions such as zoom or other adjustments.
- 4.2 Signs shall be displayed prominently at all school board facilities entrances that notifies individuals that the premises are subject to video recording, as well as in the immediate vicinity of the video camera.

¹Information and Privacy Commissioner/Ontario, *Guidelines for Using Video Surveillance Cameras in Schools*. (October, 2015)

5.0 DESIGN, INSTALLATION AND MAINTENANCE

- 5.1 Video cameras shall only be installed in public areas such as the building exterior or interior hallways. Cameras shall not be installed in areas of higher expectations of privacy (e.g. change rooms, washrooms, private conference/meeting rooms). The video cameras shall not be adjusted or manipulated in such a way that information from areas that have higher expectations of privacy may be collected by using functions such as zoom or other adjustments.
- 5.2 Signs shall be displayed prominently at all school board facilities entrances that notifies individuals that the premises are subject to video recording, as well as in the immediate vicinity of the video camera.
- 5.3 There is an expectation that once a system is installed that it remains operational. Any issues or concerns regarding operational performance shall be immediately reported to Facilities Services.
- 5.4 A camera inventory is to be maintained by Facilities Services. Additional cameras, camera removal, or relocation are to be approved by and done through Facilities Services. Facilities Services Staff may choose to add additional cameras on the exterior of the buildings for vandalism prevention.
- 5.5 Inoperable and/or decoy cameras are not permitted on the Durham District School Board property. Any non-operational cameras must have a work order requested and must be treated with a high level of priority, in the interest of public safety.

6.0 OPERATION

- 6.1 Only the Principal, Senior Administrative staff or designated alternate(s) may review recorded images. A log shall be kept indicating what recording has been viewed, when, by whom, and the reason for the viewing.

7.0 RECORDS

- 7.1 Any visual data of an identifiable individual falls within the definition of personal information under the Act. Therefore, the collection, use, retention, disclosure, security and disposal of video surveillance records must be done in compliance with the Act.
- 7.2 The retention period for information that has not been viewed for law enforcement, school or public safety purposes shall be one (1) month.
- 7.3 Information that has been used for law enforcement, school or public safety purposes shall be retained for one (1) year.
- 7.4 All recorded images are the property of the Durham District School Board.
- 7.5 Incident specific images may be released to the Durham Regional Police Service to aid an investigation for which a proceeding is likely to result or to comply with a warrant or court order. A record of such disclosure will be kept, including information about the footage disclosed, the reason for the disclosure, the case file number related to the law enforcement agency's investigation, the names of the officers receiving the disclosure, the means of disclosure, and whether the footage will be returned or securely destroyed by the police. Digitized footage shall be disclosed in an encrypted format.
- 7.6 Recorded images may be disclosed further to an access to information request, in compliance with the Act.
- 7.7 In order to ensure continuity of images and protection of recorded data, the video recorder/server must be stored in a secure and restricted area and form, e.g. encrypted, school vault, hub room. Monitors will also be located in secure and restricted areas.

- 7.8 Old storage devices, e.g. VHS tape, DVD disc, must be securely disposed of in a manner in which personal information cannot be reconstructed or retrieved.
- 7.9 Recorded information must be disposed of in a manner that prevents it from being retrieved or reconstructed.

Appendix:

Appendix 1 - Assessment Form
Appendix 2 - Surveillance Footage Viewing Log
Appendix 3 - Surveillance Footage Release Form

Effective Date:

2004-11-21

Amended:

2006-08-08

2017-10-17

Video Surveillance Systems Privacy Impact Assessment Form

SCHOOL CONTACT INFORMATION:
RATIONALE:

Please summarize the need for a Video Surveillance System.

INCIDENT(S) HISTORY:

Be specific. List examples and indicate Police Incident number, if applicable.

INTERVENTION HISTORY:

Be specific. List examples and details.

CONSIDERATIONS UNIQUE TO FACILITY:

Be specific (i.e., "The original school was built in ____ and since has undergone ____ additions. This had lead to a large number of access points into the school, many of them obstructed.)

PROCESS TAKEN TO MITIGATE PRIVACY IMPACTS:

List specific items that have been done or will be done (i.e. Revised proposed camera locations and Board Procedure at staff meeting; preparing a letter, detailing the project, to be sent home to parents; arranging for signage.)

WHAT PARENTAL/STAFF CONSULTATION HAS TAKEN PLACE? *Be specific (i.e. Discussed initial proposal at SCC meeting; reviewed camera locations at subsequent SCC meeting; reviewed camera locations at staff meeting.)*

VIDEO SURVEILLANCE SYSTEMS

APPENDIX 2

SURVEILLANCE FOOTAGE VIEWING LOG

This log is to be kept with the Digital Video Recorder (DVR)

SCHOOL: _____

[illegible]

VIDEO SURVEILLANCE SYSTEMS

APPENDIX 3

SURVEILLANCE FOOTAGE RELEASE FORM

SCHOOL: _____

Use of Recorded Surveillance Footage: *Incident specific images may be released to the Durham Region Police Service to aid an investigation for which a proceeding is likely to result or to comply with a warrant or court order. Digitized footage shall be disclosed in an encrypted format for a one (1) year period.*

**TO BE FILLED OUT BY DURHAM REGION POLICE SERVICE*

I, the undersigned, declare that I have received the recording and understand that this information remains the property of Durham District School Board and will not be duplicated without the permission of the Durham District School Board.

Name

Footage disclosed *(Date of the Recording)*

Reason for disclosure

Case file/incident # related to the investigation

Will the footage be returned or securely destroyed by the police?

If returned, please enter return date

Signature

**TO BE FILLED OUT BY A DURHAM DISTRICT SCHOOL BOARD REPRESENTATIVE (FACILITIES SERVICES)*

Date of footage release

Representative name

Representative signature
