

Purpose

This Administrative Procedure outlines, for Rocky View School (RVS) employees, the responsibilities, system requirements, acceptable locations and use of closed circuit video surveillance.

Background

Closed circuit cameras may be used on school property or school buses in order to investigate behaviors that affect the safety and well-being of students and staff. Video cameras may also be used as tools in the protection of school premises or other Division property. See Administrative Procedure AP5405 for the steps to request a new, or modifications to an existing, closed circuit video camera system.

Definitions

Closed Circuit Video Surveillance Refers to video-audio-digital components of multi-media surveillance not publicly distributed or accessible.

Authorizers Those who retain direct access to, and authorize access to, video records, images and monitors. Namely, the School Principal or Director of Transportation.

Procedures

1.1. Camera Location, Operation and Control:

- 1.1.1. Division buildings, grounds or RVS authorized student transportation mediums may be equipped with video cameras.
- 1.1.2. Video monitoring devices on the building and/or grounds will be authorized by the Principal.
- 1.1.3. Video monitoring utilized on student transportation mediums shall be authorized and operated as determined necessary by the Director of Transportation. The monitoring will be used to observe student behaviour or, in consultation with the contractor, the actions of a bus driver. The Director of Transportation shall be responsible for managing and auditing the use and security of cameras, monitors, stored images, or other video records. Recordings that were obtained while observing student behavior may be provided to the School Principal. When provided to the Principal, the Principal shall be responsible for the video recording as a record and will follow all procedures for access and security of the record, including audit logs and other measures outlined within this Administrative Procedure.
- 1.1.4. Video recording equipment may be placed in areas where monitoring has proven to be necessary as a result of threats, prior property damages, security incidents or, in the case of student transportation, monitoring of student behaviour.
- 1.1.5. Video recording equipment positioned in areas outside of school buildings shall be placed at critical vantage points where it is deemed necessary to protect external assets or to provide for the personal safety of individuals on school grounds or premises.
- 1.1.6. Video recording equipment located internally shall not be directed to 'look-through' windows to areas outside the building unless it is necessary to use them as a protection measure to protect external assets and personal safety. In which case, signage must be placed outside the school to notify individuals of the presence of monitoring.

- 1.1.7. Video cameras shall not be used in areas where appropriate confidential, private activities and/or functions occur (ex. change rooms, washrooms, meeting rooms).

1.2. Notification:

- 1.2.1. Signage stating that the premises, or transportation medium, is monitored by cameras and/or recording equipment is to be placed in high visibility areas so that individuals are aware they will be monitored before they enter the area. The Authorizer, or designate, is responsible to ensure signage is in clear view and not damaged.
- 1.2.2. The Authorizers shall inform students, staff and parents at the beginning of each school year, or prior to commencement of implementing a monitoring program if mid-year, that the Division will be monitoring all activity which occurs at designated monitoring points throughout the school year and explain the purpose for such monitoring practice.
- 1.2.3. The Authorizers shall make staff, including bus contractors if applicable, aware of the Division's video monitoring procedures.
- 1.2.4. The Authorizers shall be the responsible for notifying the school council of video monitoring practices.

1.3. Use of Video Records:

- 1.3.1. Video records, from cameras or recording devices as per this procedure, of student or staff actions may be used by the Division or school administrators as evidence in any disciplinary action brought against any student arising out of the student's or staff's conduct.
- 1.3.2. Unauthorized use of video recording(s) is not permitted (i.e. clips included in a 'school year in review' video).
- 1.3.3. Video records may be monitored by Division personnel as is deemed necessary and prudent in order to ensure the safety and security of students, staff, visitors and Division property as well as ensure adherence to school/bus rules.
- 1.3.4. The Division may use video monitoring to detect or deter criminal activity(ies) which occur in view of the cameras.
- 1.3.5. The Division or its administrators may use video monitoring and the video recordings for investigation purposes including:
- Inquiries and proceedings relating to law enforcement;
 - Deterrence; and
 - Discipline (student, staff or contracted employee).
- 1.3.6. The Division shall not use video monitoring for other purposes unless expressly authorized by or under an Act or enactment.

1.4. Security of Information/Images:

- 1.4.1. Reasonable security measures will be in place to ensure security of surveillance equipment from unauthorized access, loss, theft or tampering.
- 1.4.2. Closed Circuit Camera monitoring station, used for review and playback, will not be located in a position that will enable public viewing.

- 1.4.3. Cameras must be on a closed circuit network with no external access. Authorizers are responsible to ensure that these systems remain closed and that access can only be obtained at the console. Authorizers or designates found to be checking cameras through a web connection may no longer be granted access to the system either as an Authorizer or designate.
- 1.4.4. The video monitoring viewing station is to be located in an area where access is controlled, and can be locked down to ensure protection of information. The monitoring program must have the ability to limit users including security protection of data.

1.5. Access to, and Retention of, Information/Images:

- 1.5.1. All video records not in use shall be securely protected from unauthorized access.
- 1.5.2. Only the Principal or the Director of Transportation, in relation to Student Transportation, (the Authorizers) or specifically authorized RVS Staff, the Associate Superintendent of Human Resources and members of the police service shall, in accordance with this procedure, have access or authorize access to video records, images and monitors following the act of recording. Only the Authorizer shall have access to video monitors while they are in operation, providing live streaming of video.
- 1.5.3. The Authorizer is responsible to ensure that cameras remain operational. If a camera is not operational the Authorizer is responsible for removing the signage and notifying all parties, as outlined in 1.2, that the camera is not operational.
- 1.5.4. Video records may be reviewed or audited by the Business and Operations Department, or Information Technology Branch, for the purposes of determining adherence to Board policy, administrative procedures, contractual obligation, transportation practices, safety and school/bus rules.
- 1.5.5. Video recordings shall not be disclosed, except in accordance with this procedure. Disclosure of video records shall be on a need-to-know basis in order to comply with the Division's objectives, including the promotion of the safety and security of students, the protection of Division property, deterrence, the prevention of criminal activities and the enforcement of school/bus rules.
- 1.5.6. An individual who is the subject of video monitoring has the right to request access to the recording in accordance with the provisions contained under the Freedom of Information and Protection of Privacy (FOIP) Act. Access in full or part may be refused on the basis set out within the FOIP Act. Access must be requested as outlined in AP180.
- 1.5.7. Video records may be released to third parties or applicants in accordance with the provisions contained in the Freedom of Information and Protection of Privacy Act of Alberta and any rules or regulations there under. The Authorizer will direct the requestor to complete the divisions FOIP Request Form (See AP180). The Authorizer will only release footage following confirmation from the FOIP Coordinator that they are able to proceed. Any such disclosure shall only be made in accordance with applicable legislation.
- 1.5.8. All video records that have been used for the purpose of this procedure shall be numbered, dated and retained in accordance to this procedure. Video records shall be retained for 30 days within the system they are housed. At which time, the Authorizer is responsible to ensure

that records are erased. Video records that contain personal information, and are used to make a decision directly affecting an individual, may be retained for a minimum of one year, housed in a secure location in consultation with Business and Operations and Information Technology.

1.5.9. The Authorizer must authorize access, of any individual, to video records.

1.5.10. A log shall be maintained showing each time an authorized individual access(es), or uses, a video record. The log shall indicate date/time/name of the individual accessing the information and authorization from the Authorizer.

1.6. Video Monitors and Viewing:

1.6.1. Video records are to be viewed on a need-to-know basis only, and in such a manner as to avoid public viewing.

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References

- i. External Legislation:
 - The Education Act Section 33, 52, 53, 65, 68, 197, 222
 - Freedom of Information and Protection of Privacy Act
 - FOIP Regulation 200/95
- ii. RVS Policies and Procedures:
 - AP140 – Responsible Use of Technology
 - AP147 – Use of RVS Computer Devices
 - AP180 – FOIP Requests for Information or Correction to Personal Information
 - AP185 – Records Management
 - AP182 – Protection of Privacy
 - AP5405 Alterations to School Buildings or School Grounds
- iii. RVS Forms
 - None
- iv. RVS Handbooks and Manuals
 - Video Surveillance Log Sheet Template
- v. Contact/Branch
 - Business and Operations Department (busops@rockyview.ab.ca)