



YORK CATHOLIC DISTRICT SCHOOL BOARD

BOARD POLICY	
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March 9, 2004	June 8, 2010 June 26, 2015 June 21, 2016 September 27, 2022

POLICY TITLE: USE OF VIDEO SURVEILLANCE EQUIPMENT

SECTION A

1. **PURPOSE**

The York Catholic District School Board is committed to ensuring the safety of individuals as well as the security of equipment and property of the board within the scope of services provided to students, staff and community members by monitoring internal and external facility security. As such, the Board approves the installation and use of video surveillance systems in schools and on Board premises. The purpose of this policy is to provide direction and guidelines to staff regarding the use of such systems.

2. **OBJECTIVE**

It is the policy of the York Catholic District School Board to employ video surveillance systems in schools and facilities owned by the Board for the protection of students, staff and community members or in assisting in the detection and deterrence of criminal activity and vandalism. The Board shall operate these systems in compliance with relevant legislation and the guidelines of this policy.

3. **PARAMETERS**

3.1 Surveillance activities involving the collection, retention, use, disclosure and disposal of personal information in the form of video surveillance shall be in compliance with [Municipal Freedom of Information and Protection of Privacy](#) legislation.

3.2 The use and security of video surveillance equipment as well as compliance with the policy, guidelines and procedures shall be reviewed on an annual basis.

3.3 Video surveillance equipment shall be installed in such a manner that it monitors only the spaces requiring video surveillance as determined by the board.

- 3.4 Monitoring of locations where students, staff or authorized visitors have an expectation of privacy will be prohibited (e.g., change rooms, washrooms).
- 3.5 Access to the school-based video surveillance software, hard drives, and recorded information shall be restricted to authorized individuals only (e.g., Principal, Vice Principal(s), Superintendents, maintenance personnel or service personnel as approved by the **Superintendent of Facilities Services and Plant**. These individuals shall have the authority to provide shared access with authorized agencies such as York Regional Police, Catholic Children's Aid Society or Children's Aid Society.
- 3.6 The retention period for the storage of recorded video surveillance information shall be:
 - 3.6.1 Sixty (60) calendar days for information not viewed for law enforcement, school or public safety purposes; or,
 - 3.6.2 One (1) year for information viewed by or disclosed to authorized agencies.
- 3.7 Video surveillance notification signs shall be prominently displayed at sites where there is video surveillance equipment.
- 3.8 Any breach of security or misuse of video surveillance equipment will be investigated in accordance with the Board's *Privacy Breach Protocol*.

4. RESPONSIBILITIES

4.1 Director of Education

- 4.1.1 To oversee compliance with the Use of Surveillance Equipment policy and guidelines.
- 4.1.2 To report to the Board, the results of any investigation related to a confirmed breach of security.

4.2 Superintendent of Facilities Services and Plant

- 4.2.1 To oversee the installation and life cycle management of the authorized video surveillance system.
- 4.2.2 To ensure that an evaluation of the use and security of video surveillance equipment as well as compliance with the policy, guidelines and procedures is conducted on an annual basis.
- 4.2.3 To investigate all breaches of security with respect to the use, deliberate misuse or negligent use of video surveillance equipment.
- 4.2.4 To incorporate training for employees, where applicable and appropriate, into orientation programs of the Board as necessary.
- 4.2.5 To support School Administration with requests from any other person(s) or agency that does not have authorized permission to review recorded information and to notify the appropriate Superintendent of such requests.
- 4.2.6 To act on system failure or malfunction in a timely manner.
- 4.2.7 To manage the retention periods for the storage of information as follows:
 - 4.2.7.1 For information that has not been viewed for law enforcement, school or public safety purposes every sixty (60) calendar days; and,
 - 4.2.7.2 For information that has been viewed by or disclosed to authorized agencies (e.g. law enforcement, Courts of Law, Children's Aid Society) or for school/public safety purposes one (1) year from the

date of viewing or until such time as it is no longer needed for legal purposes, whichever is longer.

4.3 Privacy Manager

4.3.1 To be responsible for the privacy obligations outlined in the *Municipal Freedom of Information and Privacy Protection Act* relating to the employment of video surveillance systems.

4.4 Principal

4.4.1 To oversee the day-to-day operation of the video surveillance system in accordance with the policy, guidelines, and direction or guidance of Board personnel.

4.4.2 To authorize permission for the viewing of recorded information if requested by authorized agencies.

4.4.3 To consult with the school superintendent and the Superintendent of Facilities Services and Plant when a request from any other person(s) or agency that does not have authorized permission to review recorded information is received.

4.4.4 To advise the appropriate Superintendent if a request has been made to view recorded information.

4.4.5 To report system failure or malfunction as soon as possible.

4.5 Superintendents

4.5.1 To support Principals with the implementation of the *Use of Video Surveillance Equipment* policy and guidelines.

4.5.2 To respond to Principals upon receipt of any requests to view recorded information from any other person(s) or agency that does not have authorized permission to review recorded information.

5. DEFINITIONS

5.1 Authorized Agency

An organization who has legislative jurisdiction for the request of recorded video surveillance information including, but not limited to, York Regional Police or Children's Aid Society.

5.2 Personal Information

Recorded information about an identifiable individual as defined by the *Municipal Freedom of Information and Privacy Protection Act* and which may include, but is not limited to, the individual's gender, age, height, weight, race, colour, national or ethnic origin.

5.3 Reception Equipment

The equipment or device used to receive or record the personal information collected through a video surveillance system, including a camera or video monitor or any other video, audio, physical or other mechanical, electronic or digital device.

5.4 Record

Any record of information as defined by the *Municipal Freedom of Information and Privacy Protection Act*, including but not limited to information however recorded, whether in printed form, on film, by electronic means or otherwise, including but not limited to:

- 5.4.1 Correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof; and,
- 5.4.2 Subject to the regulations, any record that is capable of being produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution.

5.5 Storage Device

A videotape, computer disk or drive, CD ROM, computer chip or other device used to store the recorded data or visual, audio or other images captured by a video surveillance system.

5.6 Video Surveillance System

A video, physical or other mechanical, electronic or digital surveillance system or device that enables continuous recording, observing or monitoring of information in spaces requiring video surveillance as determined by the Board. The term video surveillance system may include an audio device, thermal imaging technology or any other component associated with capturing the image of an individual. Board installed video surveillance systems are not connected to municipal or provincial networks.

6. CROSS REFERENCES

Information and Privacy Commissioner of Ontario: [Guidelines for Using Video Surveillance, October 2015](#)
[Municipal Freedom of Information and Protection of Privacy Act](#)

YCDSB Policy 109 [Records and Information Management](#)
 YCDSB Policy 112 [Privacy and Freedom of Information](#)
 YCDSB [Privacy Breach Protocol](#)

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SECTION B: GUIDELINES

1. General

Video security surveillance systems are a resource used by the York Catholic District School Board for the protection of students, staff and community members or in assisting in the detection and deterrence of criminal activity and vandalism and to monitor internal and external facility security.

- 1.1 In the event of a reported or observed incident, the review of recorded information by authorized personnel, including the Principal, Vice Principal(s), Superintendent, maintenance personnel or service personnel as required, may be used to assist in the investigation of the incident.
- 1.2 The board shall maintain control of and responsibility for the video surveillance system at all times.
- 1.3 Any agreements between the board and service providers shall state that the records dealt with or created while delivering a video surveillance program are under the board's control and subject to the *Municipal Freedom of Information and Protection of Privacy Act*.
- 1.4 When dealing with privacy issues that may arise in the context of video surveillance, Academic Superintendents are to consult with the YCDSB Privacy Officer and/or legal counsel as is appropriate.

2. Collection of Personal Information Using a Video Surveillance System

- 2.1 In accordance with *the Municipal Freedom of Information and Protection of Privacy Act* video surveillance systems can be operated to collect personal information about identifiable individuals.

3. The Design, Installation and Operation of Video Surveillance Equipment

In designing, installing and operating a video surveillance system, the Board will consider the following:

- 3.1 Staff will endeavour to ensure that the proposed design and operation of the video surveillance system minimizes privacy breaches.
- 3.2 Reception equipment such as video cameras, audio or other devices will be installed in areas where video surveillance is a necessary and viable detection or deterrence strategy. The video surveillance reception equipment will operate 24 hours/seven days a week.
- 3.3 The equipment should be installed in such a way that it only monitors those spaces that have been identified by the Board in consultation with the school community as requiring video surveillance.
- 3.4 Written signs, prominently displayed at the entrances, exterior walls and/or the interior of buildings having video surveillance systems, shall inform students, staff and the public that video surveillance is in effect.

4. **Access, Use, Disclosure, Retention, Security and Disposal of Video Surveillance Records**

Any information obtained by way of video surveillance systems may only be used for the purposes of the stated rationale and objectives set out to protect student, staff and public safety or to detect and deter criminal activity and vandalism. Since video surveillance systems create a record by recording personal information, each school/facility having a system will implement the following procedures:

- 4.1 All surveillance videos that are requested or are archived for investigative purposes shall be quarantined and secured on an electronic medium that is protected and encrypted by controlled access for a specified period of time in accordance to a retention period determined by the Board. Each video shall be dated, labelled and tracked by an electronic audit record created by ~~Principals at the School level~~ and authorized personnel in the Facilities Department at the Board level.
- 4.2 Procedures on the use and retention of recorded information include:
 - 4.2.1 Only authorized personnel including the principal or designate, may review recorded information. Circumstances, which would warrant review, will normally be limited to an incident that has been reported and/or observed, or to investigate a potential crime.
 - 4.2.2 The retention period for information that has not been viewed for law enforcement, school or public safety purposes shall be sixty (60) calendar days. Recorded information that has not been used within this timeframe is to be routinely erased in a manner in which it cannot be reconstructed or retrieved.
 - 4.2.3 When recorded information has been viewed by or disclosed to authorized agencies (e.g. law enforcement, Courts of Law, Children's Aid Society) or for school/public safety purposes, the retention period shall be one (1) year from the date of viewing or until such time as it is no longer needed for legal purposes, whichever period is longer.
- 4.3 Storage devices must be securely disposed of in such a way that the personal information cannot be reconstructed or retrieved. Disposal methods include shredding or magnetically erasing the personal information.
- 4.4 An individual whose personal information has been collected by a video surveillance system has a right of access to his or her personal information. Access may be granted in whole or in part, unless an exemption applies under the *Act*. Access to an individual's own personal information in these circumstances may also depend upon whether any exempt information can be reasonably severed from the record.

5. **Training**

- 5.1 Where appropriate, the policy, guidelines and procedures will be incorporated into training and orientation programs of the Board.

6. **Evaluating the Use of a Video Surveillance System**

- 6.1 An evaluation of the use and security of video surveillance equipment as well as compliance with the policy, guidelines and procedures shall be conducted on an annual basis by authorized personnel from the Facilities Department under the supervision of the **Superintendent of Facilities Services and Plant**.