

APPENDIX B

School District No. 23 (Central Okanagan)

Policies And Procedures



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Section Six: School District Facilities

645R – VIDEO SURVEILLANCE CLOSED CIRCUIT TELEVISION (CCTV) (REGULATIONS)

1. Use of Cameras

- 1.1 Before video surveillance is introduced at a new site, a report must be submitted to the Superintendent of Schools/CEO, providing reasons why surveillance is being considered. The report will detail (if applicable) any specific incidents of property loss, safety or security breaches justifying the implementation of surveillance. The report will identify any less intrusive alternatives that have been considered and why they would not be an adequate alternative to surveillance. In addition, the report must set out the methods that will be used to minimize the privacy impact of the surveillance initiative. The report must indicate that consultation with the school community has taken place and that the Parent Advisory Council has approved the installation plan.
- 1.2 If a surveillance camera is to be used within a school facility or on school land, the Board will provide notice of its plans to the applicable Parent Advisory Council. In accordance with and as required under Section 74.01 of the School Act, the Board must obtain the approval of the Parent Advisory Council before proceeding with implementation of the surveillance system.
- 1.3 Where the Board deems it appropriate, the Board may undertake consultations with other affected individuals regarding the implementation of surveillance, such as students, parents, staff or members of the community.
- 1.4 Signs must be clearly written and prominently displayed to notify the public of video surveillance. Notices must include contact information for the designated staff assigned to answer questions about the surveillance system. Signs indicating that video surveillance is in the area shall not be posted in locations where video surveillance is not operational.
- 1.5 The Superintendent of Schools/CEO or designate must authorize any exceptions to 1.4, (e.g. a time limited specific investigation into criminal conduct or identifying specific safety or security issues). Such authorization will only occur if covert surveillance is essential to the investigation and this outweighs the privacy interests of those likely to be observed and after a detailed, comprehensive assessment of alternative options has occurred. Covert surveillance will not be authorized on an ongoing basis.



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- 1.6 Video surveillance is not to be used in locations where appropriate confidential or private activities/functions are routinely carried out (e.g. washrooms, private conference/meeting rooms). Any exception to this must be authorized by the Superintendent of Schools/CEO or designate on the basis that no other option is feasible, the need is pressing and the privacy rights are outweighed. Surveillance of such locations must not be authorized on an ongoing basis.
- 1.7 All organizations that rent/occupy any part of the school property after hours must be advised that a recording CCTV system is in use and could potentially capture individuals' images.

2. Security

- 2.1 Video cameras will be installed only by a designated employee or service provider of the School District. Only designated employees/service providers and the building administrator will have access to the CCTV system. Only these employees can handle the camera or recorded images.
- 2.2 Only authorized persons will have access to the system's controls and recording equipment, and the Board will limit such access to those of its authorized personnel with a need to exercise such access. Video monitors will not be located in a position that will enable public viewing, and reasonable security measures will be in place to secure surveillance equipment from unauthorized access, loss, theft or tampering.
- 2.3 A log of all instances of access to and use of recording will be maintained.
- 2.4 When implementation of an overt surveillance system has been authorized, the Board will ensure that affected staff, students, volunteers and the public are notified of surveillance equipment locations. Notification will be by means of clearly worded signs, prominently displayed at the perimeter of the surveillance areas. Such signs will identify the purpose of the surveillance and contact information of the designated staff person who can answer questions about the surveillance system.
- 2.5 Recorded images will be stored in a secure location not normally accessible to students and the public, and can only be accessed by authorized personnel.
- 2.6 Recorded images must never be sold, publicly viewed or distributed except as provided under this policy or as permitted under the Freedom of Information and Protection of Privacy Act or other applicable laws.



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3. Viewing of Recorded Images

3.1 Monitors used to view recorded images will not enable public viewing.

Recorded images will only be viewed by:

- the building administrator or individual authorizing camera installation;
- management staff responsible for transportation where the image is from a bus surveillance system;
- parents and students (see 3.3 below);
- School District staff with a direct involvement with the recorded contents of the specific recorded images;
- employees or agents responsible for the technical operations of the system (for technical purposes only);
- an employee or student facing any disciplinary action may authorize ~~his/her~~ their union representative or other advocate to view the recorded images; and,
- law enforcement agencies at the discretion of the Administrator.

3.2 The site administrator has the authority to grant temporary emergency responder access to CCTV monitoring for that site:

- for a specific defined training exercise; and,
- in the event of an emergency situation.

3.3 Parents/guardians requesting to view recorded images of their child(ren) will be permitted to the extent that such access is permissible under the Freedom of Information and Protection of Privacy Act and other applicable laws. Students may view recorded images relating to themselves if they are capable of exercising their own access to information rights under the *Freedom of Information and Protection of Privacy Act*. Viewing may be refused or limited where viewing would be an unreasonable invasion of a third party’s personal privacy, would give rise to a concern for a third party’s safety, or on any other ground recognized in the *Freedom of Information and Protection of Privacy Act*.

3.4 Student/parent/guardian viewing must take place in the presence of an administrator or authorized individual. A student/parent/guardian has the right to request that an advocate be present during viewing.

4. Retention of Recorded Images

4.1 The Board reserves the right to use or share video tape for the purposes of investigation into any incident occurring on School District property, in connection



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with legal claims or the possible violation of laws. Video footage may, where appropriate, be shared with the School District’s insurers or legal advisors, or used as evidence in legal proceedings.

- 4.2 Recorded images will be erased within 30 days, unless they are being retained as documentation related to a specific incident, or are being transferred to the Board’s insurers or legal advisors.
- 4.3 Recorded images that are retained by the Board after 30 days will only be retained as necessary to fulfill the purposes for which it has been retained, subject to the record retention requirements under the Freedom of Information and Protection of Privacy Act and other applicable laws.

5. Review

- 5.1 Each building administrator is responsible for the proper implementation and control of the video surveillance system.
- 5.2 The Superintendent of Schools/CEO, or their designate, will conduct a review at least annually to ensure that this policy and regulations are being followed. The Superintendent of Schools/CEO will make a report to the Board on the use of video surveillance in the School District.

Date Agreed: June 27, 2001

Date Reviewed/Amended: November 13, 2002

Date Amended: December 8, 2004, November 28, 2007;
November 10, 2010; February 12, 2014; June 22, 2016;
October 11, 2017; May 26, 2021

Related Documents: Policy 645; Freedom of Information and Protection of Privacy Act