

**MEDICINE HAT PUBLIC BOARD OF EDUCATION OPERATES AS MEDICINE HAT PUBLIC SCHOOL DIVISION,
AND FOR THE PURPOSE OF THIS DOCUMENT WILL BE REFERRED TO AS "MHPSD" AND/OR "DIVISION"**

SECTION 600 – STUDENTS

ADMINISTRATIVE PROCEDURE: VIDEO SURVEILLANCE

PROCEDURE CODE:	644 AP 001
Policy Reference: 644 – Surveillance	Exhibits: 644 E 001 – Sample Letter for Principals 644 E 002 – FOIP Privacy Impact Assessment Tool 644 E 003 – Notice 644 E 004 – Surveillance Video Release Form 644 E 005 – Log- Access and Viewing of Video Surveillance

DEFINITIONS

1. "Video surveillance system" means a mechanical, electronic or digital device that enables continuous or periodic observing, monitoring, or recording of individuals in school buildings and on school premises.
2. A "recording" means any record that is capable of being produced from a machine-readable record.
3. "Real time monitoring" means the viewing of images presented on a video monitor when the events presented by those images are actually occurring.
4. "Personal information" means personal information as defined in the Freedom of Information and Protection of Privacy Act.

PROCEDURES

1. Use of Video Surveillance Systems:
 - 1.1. The Board will only use personal information collected by a video surveillance system in accordance with the Freedom of Information and Protection of Privacy Act and the Education Act.
 - 1.2. Video surveillance systems may be used to monitor and/or record activity that occurs on property that is owned, operated or leased by the Division.

- 1.3. Before video surveillance is introduced at a site, the Privacy Impact Assessment Tool contained in Exhibit 644 E 002 – FOIP Privacy Impact Assessment Tool must be completed by the school principal and an approval in writing must be received from the Superintendent of Schools (see Exhibit 644 E 002 – FOIP Privacy Impact Assessment Tool).
 - 1.4. Video surveillance camera locations must be authorized by the Superintendent of Schools or designate and parents must be duly informed (see Exhibit 644 E 001 – Sample Letter for Principals).
 - 1.5. Surveillance cameras located inside a building shall not be directed to look through windows to areas outside the building, unless necessary to protect external assets or to ensure the personal safety of students or employees.
 - 1.6. Cameras shall in no event be directed to look through the windows of adjacent buildings.
 - 1.7. Video surveillance cameras shall not be used to monitor areas where individuals have a reasonable expectation of privacy. Such areas include, but shall not be limited to, change rooms and washrooms.
 - 1.8. Video recordings may be used by the Board or designate as evidence in any disciplinary action brought against an individual arising out of the individual's conduct on or about Board property and/or to detect criminal offenses that occur in view of the camera.
 - 1.9. Signs providing notice to users of the premises of video surveillance shall inform individuals of (see Exhibit 644 E 003 - Notice):
 - 1.9.1. the areas in which surveillance is conducted;
 - 1.9.2. the purpose for the surveillance;
 - 1.9.3. contact information for additional information about the video surveillance system.
2. Security:
- 2.1. Only a designated employee or an agent of the Division is permitted to install video cameras. Only the school principal or designates shall have access to the key that opens the camera boxes or room where this equipment is kept. Only these individuals shall handle the camera or video recordings.
 - 2.2. Video recordings shall be retained in secure storage, in an area to which students and members of the public do not have access.
 - 2.3. All video recordings shall be numbered, dated and retained according to camera site.
 - 2.4. Video recordings may never be disclosed, publicly viewed or distributed in any fashion except as provided for by this Policy or authorized by law.



3. Real Time Monitoring:
 - 3.1. The principal must approve all instances of real time monitoring. Real time monitoring will be limited to circumstances where there is a substantial and compelling concern for safety, security or investigation of a specific allegation of significant misconduct.
 - 3.2. The monitor used for real time monitoring shall be located in a secured area of the administrative office area under the direct supervision of the principal or designated employee, in a position that enables viewing only by the principal or designate.
4. Viewing of Video Recordings:
 - 4.1. An individual whose personal information has been collected and recorded by a video surveillance system may request access to the information in accordance with the Freedom of Information and Protection of Privacy Act. Where access is provided to the video surveillance system records in accordance with the Act, the Superintendent of Schools or designate shall ensure that a Video Recording Release Form is completed before releasing video recordings to appropriate authorities or the applicant. The Video Recording Release Form shall indicate the reason for the request, the individual organization to whom/which the video recording has been given, the date on which the video recording was taken, and the date on which the video recording was returned. In the event that the video recording is not returned, the reason(s) therefore shall be noted on the form (see Exhibit 644 E 004 – Surveillance Video Release Form).
 - 4.2. Video monitors used to view video recordings shall not be located in a position that enables public viewing. Only those employees of the Division or designates who are required and authorized to do so in the performance of their duties may review the video surveillance system and recordings.
 - 4.3. A log shall be maintained of all access to, or use of, video recordings (see Exhibit 644 E 005 - Log).
5. Retention of Video Recordings:
 - 5.1. Video recordings shall be erased or otherwise disposed of within 90 days, unless they are being retained at the request of the school principal, Division official, law enforcement official, employee, parent, or student for documentation related to a specific incident, or are being transferred to the Division's insurers.
 - 5.2. Video recordings retained under 5(a) above shall be erased or otherwise disposed of as soon as the incident in question has been resolved, except when the video recording has been used in the making of a decision about an individual. Video recordings that have been used to make a decision directly affecting an individual shall be retained for a minimum of two years.
 - 5.3. Where an incident raises a prospect of a legal claim against the Division, the video recording, or a copy of it, shall be sent to the Division's lawyers. The original of the



video shall be maintained by the Division until the final conclusion of the legal proceedings.

5.4. Video recordings shall be disposed of in a secure manner.

6. Review:

6.1. Each school principal or site supervisor is responsible for the proper implementation and control of the video surveillance system at a particular site.

6.2. All surveillance operations are subject to audit and school principals and site supervisors may be required to justify any aspect of their use of video surveillance.

6.3. All Division video monitoring shall be carried out in accordance with this Policy/Regulation. The Board of Trustees will take appropriate action in any cases of wrongful use of this Policy/Regulation.

7. This Policy/Procedure does not apply to covert or overt surveillance equipment being used as a case specific investigative tool for law enforcement purposes, or required by law.

REFERENCES

Alberta Education – Education Act

Freedom of Information and Protection of Privacy Act

Approved: September 7, 2010

Revised: April 26, 2013

