

Policy:	Video/Electronic Security Systems	OPER-600
Division:	Operations	

ADMINISTRATIVE PROCEDURES/REGULATIONS.

1. Approval

- 1.1 The relevant school administrator or manager must submit a **Video Surveillance Request Form** to the Assistant Director of Education (Operations) for approval of the installation, change or expansion of a video/electronic security system.
- 1.2 Approval must be granted prior to a system being installed, changed or expanded.
- 1.3 Once approval is granted, the school administrator or manager must consult with Operations Division staff regarding the purchase of a video/electronic security system, and purchases must be in compliance with the *Public Tender Act*. All costs associated with the installation of a video/electronic security system in a school will normally be the responsibility of the school.
- 1.4 The school administrator or manager must also consult with Facilities staff regarding the location of cameras on the premises.

2. Notification

- 2.1 Once a video/electronic security system is approved, notification must be provided in writing to the school council, parents/guardians and employees, that a system is approved for use and the expected start date of operation.
- 2.2 When a video/electronic security system is installed on a bus, written notice must be provided to the parents/guardians of students who regularly use that bus.
- 2.3 Signs advising that a video/electronic surveillance system is/may be operating must be displayed at entrances to buildings, at the front of school buses and in all areas that are subject to surveillance.
- 2.4 At the beginning of each school year, students and parents/guardians shall be informed of the use of a video/electronic security system through the normal means of communication (e.g. newsletter, school website, memo home).

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- 2.5 Notwithstanding 2.1-2.4, video surveillance without notification may take place on district property, as authorized by the Director of Education.
- a) Covert surveillance may be authorized on rare occasions as part of a time-limited investigation, such as an investigation into potential criminal conduct.
 - b) Covert surveillance may be authorized where it is considered to be the only available option under the circumstances and the benefits derived outweigh the potential violation of privacy of individuals observed, and where it is deemed necessary to the success of the investigation and for the safety and security of students, staff and district property.
 - c) In the case of a criminal investigation, where surveillance is conducted by a law enforcement agency, that agency shall be responsible for the installation, monitoring and removal of such surveillance equipment.
 - d) The surveillance equipment shall be removed as soon as the matter has been resolved, or converted to a full notification system as per the steps outlined in this policy and procedures/regulations.

3. Installation

- 3.1 All video surveillance equipment must be installed by qualified staff from the Vendor or from NLESD Operations Division.
- 3.2 Cameras must not be installed in areas where there is a higher expectation of privacy, such as change rooms and bathrooms.
- 3.3 Recording of sound (audio) is not permitted except for special circumstances as authorized on a temporary basis by the Director of Education.

4. Storage

- 4.1 Video surveillance monitors must be located in a secure place with restricted access.
- 4.2 Surveillance recordings must be stored in a secure place with restricted access. This would normally be in a protected electronic folder or in the office of the principal, vice-principal or manager.
- 4.3 Network-connected systems must only be on the firewall-protected intranet system, and not be openly accessible on the Internet. Network-connected systems must be on password-protected sites. School administrators/managers must consult with the Computer Support Specialist assigned to the building with respect to the security of the video electronic/security system.
- 4.4 Surveillance recordings should be labeled and dated.

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5. Access and Use

- 5.1 Surveillance recordings may be reviewed for the purposes of determining adherence to Board policy or school rules.
- 5.2 Surveillance recordings may be used as evidence in any disciplinary action of a student or employee.
- 5.3 Surveillance recordings may be used for inquiries and proceedings related to law enforcement and the detection or deterrence of criminal offences. The Police may view recordings as part of an investigation.
- 5.4 The parent/guardian of a student (or the student if 19 years of age or older), or an employee, may be permitted to view some or all of a surveillance recording where the individual is a subject in the recording. The viewing must be conducted in the presence of the school administrator or manager. The student/parent/guardian, or the employee, shall be entitled to have an advocate present while the recording is being viewed.
- 5.5 Notwithstanding 5.4, viewing of the surveillance recording may be refused or limited on grounds that it would:
- a) Be an unreasonable invasion of a third party's privacy;
 - b) Give rise to a concern for the safety of a third party; or,
 - c) Be protected from disclosure under federal or provincial legislation or by court order.
- 5.6 Copies of recordings may be provided to law enforcement officials as part of an investigation. Where an incident raises the prospect of a legal claim against the District, a copy of the surveillance recording will be sent to the District's insurers. Copies of recordings may be provided to other parties in accordance with legislation or upon court order.
- a) When a copy of a recording is provided, a release form must be completed by the relevant manager or school administrator, in consultation with the ATIPP Coordinator.
- 5.7 Surveillance recordings will not be sold, publicly viewed or distributed in any other fashion except as outlined in this policy or legally authorized.
- 5.8 A log must be maintained that documents who accesses/views surveillance recordings, and the date and time.

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6. Retention and Disposal

- 6.1 Surveillance recordings shall be disposed of after 30 days, with the following exceptions:
- a) Recordings used in disciplinary matters shall be retained for one year following the conclusion of the matter.
 - b) Recordings used in law enforcement investigations/legal proceedings shall be retained for a period of one year following the conclusion of the matter, or until such time as legally required.
 - c) Recordings are retained at the request of the Director of Education.
- 6.2 Surveillance recordings shall be disposed of in such a manner that the information cannot be reconstructed or retrieved. This would normally be through erasing, overwriting or shredding, according to industry standards.

7. Audits

The school administrator or manager is responsible for ensuring that the video/electronic security system is operated appropriately. The ATIPP Coordinator or designate may periodically conduct a review of the use of an approved video/electronic surveillance system, to ensure consistency with the information provided on the Video Surveillance Request Form and compliance with this policy and related procedures. The District will take appropriate action in the event that the system or surveillance recordings are being used in a manner contrary to this policy.

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OPER-600A: SURVEILLANCE VIDEO RELEASE FORM

Date	Time	Video Surveillance ID #	File # (if applicable)
Name of School and Community:			
Type of Surveillance Video: <input type="checkbox"/> Tape <input type="checkbox"/> CD <input type="checkbox"/> Disk <input type="checkbox"/> Other (please specify)			
Name and Position of NLESD Authorized Individual Releasing Surveillance Video (Please Print):			
Information on Individual Receiving Surveillance Video (Please Print):			
Name: _____			
Position: _____			
Agency: _____			
Purpose or Reason for Release:			
ATIPP Coordinator has been consulted: <input type="checkbox"/> Yes DATE: _____			
Acknowledgement of Receipt			
I, the above-named, acknowledge receipt of a Newfoundland and Labrador English School District video recording:			
Signature:			
Date:			
<i>*A copy of the form must be forwarded to the ATIPP Coordinator, Newfoundland and Labrador English School District and a copy must also be provided to the individual taking custody of the surveillance video.</i>			

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