



VIDEO SURVEILLANCE IN SCHOOLS

Legal References:	<i>Municipal Freedom of Information and Protection of Privacy Act Education Act, Section 300.0.1 and 301 (2) 5 Ontario Human Rights Code</i>
Related References:	<i>Board Policy 6000 – Safe Schools Administrative Procedure 1100 – Privacy Protection and Access to Information Administrative Procedure 3085 – Safe Welcome Program Administrative Procedure 3100 - Video Surveillance Cameras in Schools Guidelines for Using Video Surveillance Cameras in Schools - Ontario Information and Privacy Commissioner, 2015</i>
Effective Date:	<i>April 2004</i>
Revisions:	<i>April 2017, October 2018, October 18, 2021</i>
Reviewed:	

1. Preamble

It is the policy of the Waterloo Region District School Board (WRDSB) that:

- 1.1 the promotion of a safe and secure learning environment is in the best interest of students, staff and the general public;
- 1.2 the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) governs the collection of personal information, including the images captured on a video surveillance system;
- 1.3 the utilization of video surveillance systems is to complement, not to replace, other means to create a safe and secure learning environment.
- 1.4 the video surveillance system will collect, use, retain and dispose of personal information in the course of meeting its statutory duties and responsibilities. The WRDSB is committed to the protection of privacy of individuals with respect to personal information that is in its custody and/or under its control.
- 1.5 personal information (video images) collected by the WRDSB, will have a specific purpose and will be kept in a secure manner. The WRDSB further commits that personal information will not be used or disclosed for purposes other than those for which it was collected except with the consent of the individual or as required by law and will be disposed of when it is no longer needed and in accordance with MFIPPA and the WRDSB Retention Schedule.

2. Definitions

- 2.1 Covert Surveillance- the use of a concealed video without an audio track for non-routine investigative purposes.

- 2.2 Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) - means the legislation that governs access to and the privacy of WRDSB records containing personal information.
- 2.3 Overt Surveillance - the unconcealed use of video for monitoring purposes or to record activities for historical review.
- 2.4 Personal Information- recorded information about an identifiable individual as per MFIPPA.
- 2.5 Retention Schedule - is a list of all the record classifications and their corresponding retention periods. The schedule also identified which records are deemed vital, which are archival, and who is the responsible department or official record holder.
- 2.6 Video Surveillance Systems -video, physical or other mechanical, electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals in school buildings and on school property (in schools this would usually include analog video, digital and closed-circuit camera systems).

3. Authority

- 3.1 The Coordinating Superintendent of Human Resources & Equity Services has overall responsibility for the WRDSB video surveillance program.
- 3.2 The following personnel are authorized to utilize/access the video surveillance system in the discharge of their duties:
 - 3.2.1 Principals
 - 3.2.2 Vice-Principals
 - 3.2.3 Health, Safety and Security Management Employees

4. Application/Scope

- 4.1 This policy applies to the operation of any video system installed within any WRDSB site for the purpose of surveillance.
- 4.2 Overt video surveillance equipment shall be used in public areas of its schools and facilities when it is deemed necessary in order to:
 - 4.2.1 Enhance the safety and well-being of students, staff and the community;
 - 4.2.2 Protect WRDSB property and equipment against theft or vandalism;
 - 4.2.3 Aid in identifying intruders and of persons breaking the law;
 - 4.2.4 Support implementation of Ministry of Education's Safe Welcome Program.
- 4.3 The WRDSB reserves the right to consider and employ lawful "covert surveillance" on a case by case basis in consultation with the appropriate Supervisory Officer. Covert video surveillance shall only be used in specific, limited circumstances as an investigative tool related to criminal or illegal activity.
- 4.4 The video taping of school events such as graduation, theatrical productions or other similar events by the parents and families of students is not addressed by this policy. See Administrative Procedure 1090 – Protection of Student Personal Information (Including Student/Voice Recordings).
- 4.5 Authorized videotaping for educational, instructional and/or research purposes are not addressed by this policy. See Administrative Procedure 1090.

5. Guidelines

- 5.1 Notice signs shall be installed at all properties with video surveillance systems, in accordance with the notification requirements of MFIPPA. Signs will be prominently displayed so the public has reasonable and adequate warning that surveillance is or may be in operation before entering the area.
- 5.2 The closed circuit television (CCTV) system within WRDSB facilities may operate continuously. All recorded images are the property of the WRDSB.
- 5.3 Cameras will not monitor areas where students and staff have an expectation of privacy, such as change rooms and washrooms.

- 5.4 Where applicable and appropriate, this policy shall be incorporated into training and orientation programs of the WRDSB.