

Policy Statement	
	Commission scolaire Western Québec Western Québec School Board
Policy No. E-10	
SUBJECT:	Video Surveillance
Approval Date: June 28, 2016	Resolution No: C-15/16-166
Revision Date:	Resolution No:
Origin: Governance and Ethics Committee	

1. OBJECTIVES

This policy is meant to establish clear guidelines for the installation and use of video surveillance systems by the WQSB and its schools/centres.

2. REFERENCES

Video Surveillance must comply with the *An Act Respecting Access to Documents Held by Public Bodies and the Protection of Personal Information*, hereinafter described as “the Act”, because such surveillance activities involve the collection, retention, use, disclosure and disposal of personal information. This policy outlines the procedure intended to maintain control of and responsibility for the video surveillance systems in our board. The rules for the use of surveillance cameras and recording devices in public places by public bodies must be followed.

Section 63.1: A public body must take the security measures necessary to ensure the protection of the personal information collected, used, released, kept or destroyed and that are reasonable given the sensitivity of the information, the purposes for which it is to be used, the quantity and distribution of the information and the medium on which it is stored.

Section 64: No person may, on behalf of a public body, collect personal information if it is not necessary for the exercise of the rights and powers of the body or the implementation of a program under its management.

3. PREAMBLE

The Western Québec School Board, its schools and centres strive to maintain safe and secure learning environments for students, staff, and community members involved in school life.

Video surveillance systems complement other means used to promote and foster a safe and secure learning environment. Principals and Center Directors may have a need to gather information that cannot be easily attained through other means. It is acceptable to employ video surveillance systems at board facilities when alternative solutions, less

prejudicial to privacy, have been considered and have proved ineffective or difficult to implement.

Video surveillance must comply with the *Act Respecting Access to Documents Held by Public Bodies and the Protection of Personal Information* when such surveillance involves the collection, retention, use, disclosure, and disposal of personal information. This policy outlines the procedure intended to maintain the control of, and the responsibility for the video surveillance system.

4. COLLECTION OF NOMINATIVE INFORMATION USING A VIDEO SURVEILLANCE SYSTEM

Video surveillance systems by their nature collect nominative information about identifiable individuals. The school board has determined that it has the authority to collect this nominative information in accordance with “the Act”. In accordance with the laws and regulations, no person shall collect personal information on behalf of the board unless the collection is:

- Expressly authorized in accordance with this policy;
- Used for the purposes of law enforcement;
- Necessary for the proper administration of the school board facilities or activities.

5. GENERAL

Video surveillance systems are resources that may be used by the Western Québec School Board, at its schools and centres to:

- a) Promote the safety of students, staff, and community members
- b) Aid in the prevention of violence and bullying
- c) Protect school property against theft or vandalism
- d) Aid in the identification of intruders and of persons breaking the law

In the event of a reported or observed incident, the review of recorded information may be used to assist in the investigation of the incident.

This policy is not intended to deal with or apply to:

- a) Instances where staff videotapes a specific event such as a school fair or graduation ceremony;
- b) Instances where a classroom is videotaped for educational or research purposes, for example, where a student teacher is required to record his or her lesson as part of an assignment for a work placement.

Video surveillance systems are in use in the board’s transportation network. These surveillance systems are the property of and under the management of the outside carriers who are governed by their contract with the board. The board’s Transportation Department, in consultation with schools and carriers, determines when and where video surveillance may occur. Video cameras in buses are to be used to:

- a) Promote the safety of students while on buses
- b) Aid in the prevention of violence and bullying
- c) Protect carriers' property against vandalism
- d) Aid in the identification of intruders and of persons breaking the law

6. IMPLEMENTATION OF A VIDEO SURVEILLANCE SYSTEM

In designing, installing, and operating a video surveillance system, the school board, as part of its general overall responsibility for video surveillance systems, will consider the following:

- a) Video surveillance equipment such as video cameras, audio equipment, or other devices should only be installed in identified public areas where video surveillance is a necessary and viable detection or deterrence activity;
- b) The equipment should be installed in such a way that it only monitors those public spaces that have been identified as requiring video surveillance. Cameras should not be directed to look through the windows of adjacent buildings or, as much as possible, onto adjacent property;
- c) If cameras are adjustable by operators, this should be restricted, if possible, so that operators cannot adjust or manipulate them to include spaces that are not intended to be covered by the video surveillance program;
- d) Equipment shall never monitor the inside of areas where the students, staff, and the public have a higher expectation of privacy including but not limited to change rooms and washrooms;
- e) Clearly written signs prominently displayed at the entrances, exterior walls, and the interior of buildings in which a video surveillance system has been installed, shall provide students, staff, and the public a reasonable and adequate warning that video surveillance is in effect. Signage shall inform individuals of the title, business address and telephone number of someone who can answer questions about the system. As a minimum there must be multiple signs in place that notify individuals of the recording and inform them that they may contact the school office with any questions (Addendum "C"). Principals and centre directors will be the contact person for schools and centres;
- f) The reception equipment shall be in a strictly controlled access area. Video monitors shall not be placed in a position that enables public viewing. Only the personnel authorized in writing by the principal/centre director shall be permitted access to such controlled access area and the recording equipment.
- g) The persons operating the devices shall be made aware of the required procedures to protect privacy as outlined by "the Act".

7. ACCESS, USE, DISCLOSURE, RETENTION, SECURITY, AND DISPOSAL OF RECORDS

Any information obtained through the use of video security surveillance systems may be used only for the purposes set out in this policy and for the goals noted below.

Since video security surveillance systems may record nominative information, each school/centre having such a system must implement the following procedures:

- a) Video surveillance systems shall not be used for monitoring staff performance;
- b) Storage devices that are not in use must be stored securely in a locked receptacle located in a controlled access area. Each storage device that has been used should be dated and labelled;
- c) In each school/centre only the principal/centre director, the school computer technician and if needed, a senior administrator at the school board level, may review the recordings and only for the purposes outlined in this policy;
- d) Only authorized personnel shall have access to the storage device. There must always be two authorized individuals, working together, in all instances of access to, and use of recorded material. This access must be recorded in the *Access To and Viewing of Recorded Material Log* (Addendum "A");
- e) Circumstances that would warrant review will normally be limited to an incident that has been reported /observed or to investigate a potential crime;
- f) Real-time viewing of monitors may be delegated by the principal/centre director to a very limited number of individuals and for a very specific purpose;
- g) The retention period for recorded information, whether or not it has been viewed, shall be a maximum of twenty-eight (28) calendar days. This timeframe is based on experience, risk assessment, privacy considerations, and equipment capabilities. Recorded information is then to be routinely erased by a WQSB designated employee in a manner in which it cannot be reconstructed or retrieved and that there be a log kept indicating the date and the name and signature of the designated person assigned to erase the recordings;
- h) Notwithstanding section (f) above, the board will store and retain, beyond the above mentioned 28 days, the recorded information necessary for evidentiary purposes according to standard procedures until law enforcement authorities require them. In these cases, the Secretary General will be responsible for the storage and release. *The Recorded Information Release Form* (Addendum B) is to be used in these special cases;
- i) Old storage devices must be securely disposed of in such a way that the nominative information cannot be reconstructed or retrieved. Disposal methods could include shredding, burning, or magnetically erasing the nominative information;
- j) Any student, staff member, or member of the public who has been recorded by a video surveillance system has a right of access to his or her personal information according to the terms of "the Act".

8. RESPONSIBILITIES

8.1 Secretary General --- The secretary general is responsible for:

- a) Providing advice related to the School Board's obligations under this Policy;
- b) Reviewing the governing resolutions approving the installation of a video surveillance system;
- c) Overseeing the verification of the use of video surveillance systems.

8.2 School Board — The school board is responsible for:

- a) Implementing and monitoring this policy;
- b) Reviewing and approving any plan presented by the principal for installing and maintaining a video surveillance system in any of its facilities, whether or not the school/centre has requested it. Any plan must include financial, technical, and security implications;
- c) Inserting a clause in all of its transportation contracts requiring that every transportation contractor equip every bus with the capability to record activity on its buses. (This policy specifically endorses this contractual arrangement and supports the continuation of the practice of monitoring, via video surveillance, behaviour on its transportation system);
- d) Insuring all school board staff who are responsible for the monitoring of video surveillance systems have the appropriate training required and know the expectations outlined in this policy.
- e) Reviewing the effectiveness of surveillance systems in our schools and insuring compliance to this policy and "the Act".

8.3 Principal/Centre Director — The principal/centre director is responsible for:

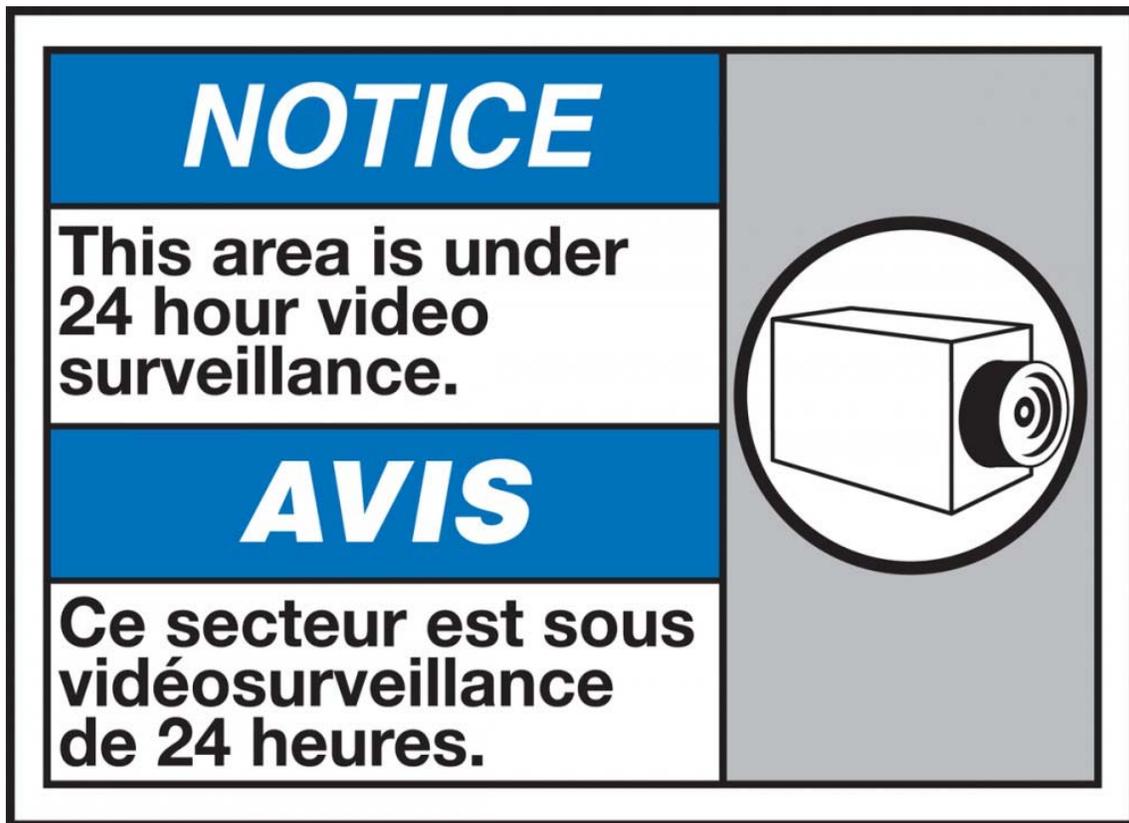
- a) Preparing a report concerning risks and dangers presented by a situation regarding public order and the security of persons, places and/or property. (The report shall also include the designation of the places targeted for video surveillance and their relation to the risk and real dangers identified in the report);
- b) Presenting the report mentioned in (a) above to the governing board;
- c) Consulting fully with the governing board before the implementation of a video surveillance system;
- d) Ensuring the proper use of a video surveillance system in accordance with school board policy;
- e) Maintaining the confidentiality and security of the information;
- f) Ensuring that access to the information is restricted to the principal and an individual designated, in writing, by the principal/centre director;
- g) Maintaining confidential the Addendum A forms for a period of at least 7 years.

8.4 Governing Board — The governing board is responsible for:

- a) Receiving and reviewing the report prepared by the principal/centre director concerning the implementation of a video surveillance system;
- b) Approving by resolution the plan for the installation of a video surveillance system if the school/centre wishes to have such a system;
- c) Overseeing the proper use of a video surveillance system in accordance with school board policy;
- d) Reviewing, for all installed video systems, on at least an annual basis, in conjunction with the principal/centre director, the decision regarding the implementation of a video surveillance system;
- e) Reviewing the necessity of maintaining a video surveillance system in place and, if applicable, the number of hours of recording per day and the recording periods during the week or the year, taking into consideration the following factors;
 - Whether the initial grounds still exist;
 - Whether the expected results have been achieved;
 - Whether the conditions of use are adequate and adapted to the situation;
 - Whether the type of cameras used and their number are appropriate;
 - Whether more appropriate alternatives compatible with existing rights to privacy can be envisioned.

RECORDED INFORMATION RELEASE FORM

Date	
School/Centre	
Principal/Director	
Device Number	
Date of Recording	
Information Released to	
Reason for Information Release	
Expected Date of Return	
Information Disposal Method	
Information Disposal Date	
Name and Signature of Individual Receiving Information	



The Western Québec School Board has installed a Video Surveillance System in this building.

The system is used
to secure the safety of students and staff,
to ensure the security of the premises,
and in the event of an incident,
to aid in the investigation of that incident.

For further information about the system and
its use you may contact the
Principal of the School or Director of the Centre.