

Frontier School Division believes that schools are a supervised environment where a reasonable degree of monitoring helps protect and maintain the safety, security and overall well-being of our students, staff, community and property.

Adopted March 15-16, 2022	Revised March 19-20, 2024	
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1. General

- a. Security cameras are installed in schools to monitor school property, to assist school administrators in observing, monitoring and reducing unacceptable behavior or activities, and to assist in investigations as required.
- b. The surveillance systems also observes:
 - Exterior and interior conditions in Division schools. Conditions such as water management, weather conditions, snow clearing and site cleanliness, are monitored, with an intent to improve conditions and reduce risks.
 - Facility elements such as windows, driveways and parking lots.
 - Site safety concerns and trespassing are also monitored and managed.
 - The activities of third-party contractors, to ensure that they are operating according to agreement.
- c. Placement – Security cameras are installed strategically throughout the Division premises to monitor high traffic areas, entrances, exits, and other various locations.
- d. Privacy – All security camera systems shall be implemented and operated in compliance with relevant privacy laws and regulations. Camera coverage will be limited to public areas where individuals do not have a reasonable expectation of privacy.
- e. The Division Facilities and Maintenance Department shall be responsible for procuring, installing, and maintaining video surveillance systems in the Division. They shall also be responsible for training site-based administrators in its use. Currently FSDs CCTV system is accessible to the security camera contractor. FSD employs the contractor to install and commission these systems but also to monitor the system, and add/remove users from the system as needed.
- f. This policy applies to video surveillance conducted by the Division. It is not intended to apply to occasions where staff or students produce recordings for educational or learning purposes.

2. Notification

- a. Frontier School Division will ensure that students, parents, staff and the general public are notified that video surveillance is being used in public areas in schools, non-school buildings and buses.

- b. Signage will be posted at the entrances of Division premises to notify individuals that security cameras are in use.

3. Collection and Use of Footage

- a. The system deployed by FSD includes a comprehensive automatic audit function that records all actions by all users. The integrated audit system lists names, IP addresses, times, duration and descriptions of what was viewed (live or playback) and the cameras that were viewed during this event. Any video that is copied from the system is listed in the audit. The audit function cannot be displayed by users.
- b. Video surveillance will not be used as a means of supervision to monitor, audit or evaluate the job performance of employees.
- c. Video surveillance may be accessed as a means to gather additional information related to investigating any accusations, allegations or disciplinary situations should they arise.
- d. The Division will periodically review and evaluate the effectiveness of security cameras in achieving the intended purposes. Any necessary updates or improvements to the policy and camera placement will be made based on the results of the review.

4. Access

- a. Recordings shall not be accessed or viewed without the advance, express authorization of the school Principal, Vice-Principal or Superintendent.

Where there is a need to review surveillance footage, the Principal, Vice-Principal or Superintendent shall first determine whether there is a reasonable basis to review the surveillance footage. Viewing may be reduced or limited if it is determined to be an unreasonable invasion of privacy, would give rise to a concern for a third party's safety, or could compromise an ongoing school, Division or police investigation.

If it is determined that there is a reasonable basis to review the surveillance footage, the Principal, Vice-Principal, Superintendent or Superintendent designate may review the footage. The Principal, Vice-Principal or Superintendent should normally view the footage in the presence of another administrator or designate, unless circumstances require otherwise.

Divisional staff members responsible for technical operation of the system (such as Manager of Facilities and Maintenance or designate) may view footage for technical and Facility Management purposes.

- b. Requests for access to security camera footage, including disclosure to third parties or law enforcement, shall be handled in accordance with applicable laws and procedures.
- c. Any and all viewing must be done in a private and secure location and in the presence of the Principal, Vice-Principal, Superintendent or Superintendent designate.
- d. The Chief Superintendent or Area Superintendent(s) may disclose information, for law enforcement purposes, including any surveillance camera recordings to the Police or other law enforcement agencies, as authorized in Section 44(1)(r) of *The Freedom of Information and Protection of Privacy Act* (FIPPA). It is recommended that all such disclosed recordings be provided by the contractor who manages and services the CCTV system. The contractor can assure that the footage submitted meets criteria for use by law enforcement and in a court of law. A request for video files should be formal, using the Video Request Form (Exhibit C.2.L-EX1).
- e. Parents or guardians may request to view a segment of a recording that includes their child(ren) as it pertains to a specific incident in question.

Students aged 18 or older may request to view specific segments of a video that pertain to them in relation to a particular incident, provided they are eligible to exercise their rights to access information under FIPPA.

- f. Access requests for video surveillance records which identify other individuals or their personal information may not be granted or authorized under FIPPA or *The Personal Health Information Act* (PHIA).
- g. Non-compliance with this policy may result in disciplinary actions, up to and including termination. Any suspected misuse or unauthorized access of security camera systems or data should be reported for investigation to the Manager of Facilities and Maintenance, who will inform the Chief Superintendent, and a decision regarding investigation will be made.

5. Records

- a. Video surveillance records will be in the custody of and under the control of Frontier School Division.
- b. Video surveillance records accessed under a *Freedom of Information and Protection of Privacy Act* request shall be retained for a minimum of forty-five (45) calendar days after the records have been disclosed to the applicant to allow the applicant an opportunity to file a complaint with the Ombudsman.

- c. All information obtained through the use of video surveillance will be protected and handled in accordance with the requirements of the FIPPA, as required.
- d. Video will be retained, securely, until it is overwritten.

6. Covert Surveillance

The above-mentioned guidelines and procedures do not apply to ‘covert’, surveillance conducted by means of hidden cameras without notice to the parties being monitored.

- a. Covert surveillance shall not be conducted in Frontier School Division without consultation with the Police and/or Division’s legal counsel and must be authorized in advance by the Chief Superintendent. In such cases, covert surveillance must be essential to the investigation and the need for covert surveillance outweighs the privacy interest of the persons likely to be observed.
- b. Covert surveillance shall only be conducted in the Division in cases involving suspected criminal activity and will not be used to monitor, audit or evaluate the job performance of employees of the Division.
- c. Covert surveillance shall not be used on an ongoing basis.
- d. Where circumstances permit, individuals who are not the intended targets of the video surveillance shall be notified of the use of video in advance of, or during the surveillance period by the Area Superintendent.

Information: [The Freedom of Information and Protection of Privacy Act](#), Sections 36(1), 44(1), 80
[The Personal Health Information Act](#)
[The Youth Criminal Justice Act](#)
[Policy G.2.A – Student Records](#)

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SECURITY CAMERAS IN SCHOOLS
Video Request Form
Exhibit C.2.L-EX1

PART A – To be completed by Requestor

Name: _____ Email: _____ Phone: _____

Location: _____

Time and Date of Incident: _____

Cameras: _____

Description of Incident:

Police Report # (if applicable): _____

Constable Name and Contact Info: _____

PART B – To be completed by Area Superintendent or Chief Superintendent

Approved? Yes ___ No ___ Date of approval: _____

Area or Chief Superintendent Name: _____

Area or Chief Superintendent Signature: _____

Directions for pulled video footage (i.e. send to Privacy Officer, send to Police, send to Requestor):

Completed form to be emailed to Area Superintendent or Chief Superintendent.

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