



Policies and Procedures
Section Seven – Miscellaneous

711 – VIDEO SURVEILLANCE

CLOSED CIRCUIT TELEVISION (CCTV)

Introduction

It is the intent of the Kelowna Society for Christian Education to create and maintain a safe school and work environment. Security (video) cameras (closed circuit television systems – CCTV) may be installed in/on Kelowna Christian School campuses to monitor school property, to assist school administrators in detecting and deterring unacceptable behaviour and activities, and to provide a historical record to assist in investigations.

Security cameras will assist to accomplish four important goals:

- to enhance the safety of students, staff and others in or on school premises,
- to protect school and individual property from theft and vandalism;
- to deter destructive behaviour and activities, and
- to assist in the identification of intruders and of persons endangering the health, well-being or safety of school community members and property.

Policy 711

Kelowna Christian School authorizes the use of video surveillance equipment on school property.

- 711.1. The use of video surveillance is authorized where circumstances have shown that it is necessary and that the benefits outweigh privacy concerns of those observed.
- 711.2. In dealing with surveillance of students, school Administration recognizes its legal obligation to provide appropriate levels of supervision in the interests of student safety.
- 711.3. Individuals have privacy rights that are reduced (but not removed) while the individuals are in or on school premises. Video surveillance, as with other forms of supervision, must be carried out in a manner respectful of these rights.
- 711.4. Video surveillance is to be carried out in accordance with this policy and the administrative regulations and failure to comply will result in appropriate action by the Lead Principal.

Procedures

Kelowna Christian School will act in a responsible manner with respect to the notice, access, disclosure, retention, security and disposal of personal information that is being collected, in accordance with the Personal Information Privacy Act (PIPA). The following principles and procedures shall govern the use of video surveillance equipment on school property:

1. Use of Security/Video Cameras

- 1.1 Security/video cameras may be used to monitor and/or to record.
- 1.2 Video surveillance camera systems and locations must be approved annually by and supported by the Lead and Vice Principals, and Business Administrator of the school.
- 1.3 Signs must be clearly written and prominently displayed to notify the public of video surveillance. Notices must include contact information for the building administrator/responsible for answering questions about the surveillance system. Signs indicating video surveillance is in the area shall not be posted in locations where video surveillance is not operational.
- 1.4 Any exceptions to 1.3, such as a time limited specific investigation into criminal conduct, must be authorized by the Lead Principal and/or Business Administrator. This will be approved only if covert surveillance is essential to the investigation and this outweighs the privacy interests of those likely to be observed. Covert surveillance may not be authorized on an ongoing basis.
- 1.5 Video surveillance will be used only in common areas, both internally and externally, to mitigate inherent risks to school community members and property. Such locations include, but are not limited to: school entrances, foyers and hallways, reception areas, and public courtyards.
- 1.6 Video surveillance is not to be used in locations where appropriate confidential or private activities/functions are routinely carried out (e.g. washrooms, change rooms, private conference/meeting rooms), or to monitor staff performance.
- 1.7 All organizations that rent/occupy any part of the school property after hours must be advised that a recording CCTV system is in use and could potentially capture individuals' images.
- 1.8 The video surveillance system will operate only, and images recorded, when activated by motion in the designated camera locations and field of vision of the equipment installed. Accordingly, it is expected that the security/video cameras will record the most activity during regular school hours of operation; i.e. weekdays between the hours 7:00 am – 4:00 pm.

2. Security

- 2.1 Video cameras will be installed only by a designated employee or agent of the school. Only designated employees/agents, school administrators, and Evangel Church authorized personnel shall have access to the CCTV system(s). Only these employees shall handle the camera or recorded images.
- 2.2 Recorded images shall be stored in a secure, restricted location not normally accessible to students and the public.
- 2.3 Recorded images may never be sold, publicly viewed or distributed in any other fashion except as provided for by this policy and appropriate legislation.

3. Viewing of Recorded Images

- 3.1 Monitors used to view recorded images should not enable public viewing. Recorded images may only be viewed by:
 - the Lead Principal, Vice-Principals, and Business Administrator in support of and furtherance of their duties;
 - the Board of Trustees to report, assist and support the investigation of serious incidents;
 - parents and students (see 3.3 below);
 - school staff with a direct involvement with the contents of the specific recorded images;
 - designated employees or agents of Evangel church, for Gordon Campus CCTV
 - employees or agents responsible for the technical operations of the system (for technical purposes only and regular system checks);
 - an employee or student facing disciplinary action may authorize his/her representative or other advocate to view the recorded images; and,
 - law enforcement agencies at the discretion of the Lead Principal.
- 3.2 A campus administrator has the authority to grant temporary emergency responder access to CCTV monitoring for that site:
 - for a specific defined training exercise; and,
 - in the event of an emergency situation.
- 3.3 Parents/guardians requesting to view recorded images of their child(ren) may do so. Students may view recorded images relating to themselves if they are capable of exercising their own access to information rights under the Freedom of Information and Protection of Privacy Act. Student/parent/guardian viewing must be done in the presence of a school administrator. A student/parent/guardian has the right to request an advocate be present during viewing. Viewing may be refused or limited if this would be an unreasonable invasion of a third party's personal privacy, would cause concern for a third party's safety, or on any other ground recognized in the Freedom of Information and Protection of Privacy Act.

4. Retention of Recorded Images

- 4.1 Where an incident may lead to a legal claim against the Kelowna Society for Christian Education, and/or its directors and officers, the recorded image, or a copy of it, shall be sent to the society's insurers.
- 4.2 Recorded images shall be stored for a maximum 30 days, erased or securely disposed of thereafter, unless they are being retained at the request of a school administrator, employee, parent or student for documentation related to a specific incident, or are being transferred to the society's insurers.
- 4.3 Recorded images retained under 4.2 shall be erased or securely disposed of as soon as the incident in question has been resolved, with one exception. If the recorded image has been used to make a decision about an individual, the recorded image must be kept for a minimum of one year (as required by the Freedom of Information and Protection of Privacy Act), unless earlier erasure is authorized by or on behalf of the individual.
- 4.4 Old storage devices must be securely disposed of in such a manner that the personal information cannot be reconstructed or retrieved. Disposal methods could include overwriting electronic records, shredding, burning or magnetically erasing the personal information.

5. Review and Compliance

- 5.1 Each building administrator is responsible for the proper implementation and control of the video surveillance system, and can respond to any questions about video surveillance within or on his/her school campus.
- 5.2 Any suspected failure to comply with the policy and related procedures, such as the unauthorized disclosure of images, shall be reported to the school's appointed Privacy Officer (i.e. Business Administrator), who will advise the Lead Principal. Employees will be subject to discipline for knowingly or deliberately breaching the policy or procedures.
- 5.3 The Lead Principal, or his/her designate, shall conduct a review at least annually to evaluate the video surveillance program and to ensure that the policy and procedures are being followed. The Lead Principal will make a report to the Board of Trustees on the use of video surveillance in the school.