

POLICIES, GUIDELINES AND PROCEDURES

SUBJECT	N.E.P.N. CODE
SECURITY: VIDEO SURVEILLANCE SYSTEMS	ECAF

I. POLICY

The Louis Riel School Division believes that schools are considered to be a supervised environment where a reasonable degree of monitoring to protect the safety and well-being of students, staff, and facilities is both desirable and expected. The division recognizes video surveillance systems as being useful in schools as a means:

- to enhance the safety of students and staff;
- to protect school property against theft and vandalism;
- to aid in the identification of intruders and persons breaking the law; and
- to assist with the maintenance of order.

The Division believes that the benefit of video surveillance systems outweighs their impact on the privacy of those observed.

The Division accepts its obligations to protect the personal privacy of individuals, in accordance with the [Freedom of Information and Protection of Privacy Act](#), and any other applicable legislation.

The Division, therefore, authorizes the use of video surveillance systems on its property and in its facilities, schools, and vehicles, subject to the **GUIDELINES** and **PROCEDURES** below.

II. GUIDELINES

A. The Information Systems Department shall be responsible for:

- procuring, installing, maintaining, and securing video surveillance and data storage systems;
- developing standardized implementation guidelines;
- training site-based administrators in its use; and
- conducting periodic reviews to ensure successful implementation of this policy.

B. This policy applies to video surveillance conducted by the Division. It is not intended to apply to occasions where staff or students record a specific event for educational or research purposes.

Adopted:	February 5, 2019	Legal References: Manitoba Ombudsman – Video Surveillance Guidelines
Reaffirmed:	April 6, 2021	



III. PROCEDURES

A. Location, Installation, and Signage

1. Video surveillance locations shall be determined by the Principal in collaboration with the Information Systems Department, based on standardized implementation guidelines. Any subsequent change in camera location must be authorized in the same manner.
2. Video surveillance will not be used in locations where confidential or private activities/functions are routinely carried out or locations where there is a reasonable expectation of privacy (e.g., washrooms, changerooms, private meeting rooms).
3. Video surveillance devices and associated signage will be installed only by designated employees or agents of the Division.
4. Public notification signs must be clearly and prominently displayed in areas that are subject to video surveillance.

B. Access to Recordings

1. Video surveillance recordings/files may only be viewed for the purpose for which the information was collected or compiled; or if the subject of the image captured consents to its use; or for a purpose for which the record may be disclosed by the Division under the [Freedom of Information and Protection of Privacy Act](#).
2. Notwithstanding **PROCEDURE B4** (below), recordings may only be viewed by the Principal or Superintendent, by parents and students, or by Division staff with a direct involvement with the contents of the specific recording, or, by employees or agents responsible for the technical operations of the system (for technical purposes only). If an employee or student is facing any disciplinary action, they may authorize their union representative or other advocate to also view the recording. All viewing of recordings must be done in the presence of the school Principal (or designate) or Superintendent (or designate).
3. Where an incident raises a prospect of a legal claim against the Board, the record, or a copy of it shall be sent to the Board’s insurers and/or solicitors.
4. Parents or guardians requesting to view a segment of a video that includes their child(ren) may do so. Students may request to view segments of a video relating to them 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 the school Principal (or designate) or Superintendent (or designate). A student, parent or guardian has the right to request an advocate to be present. Viewing may be refused or limited where viewing would be an unreasonable invasion of a third party's personal privacy, would give rise to a concern for a third party's safety, would compromise an on-going

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school or police investigation or legal proceeding, or on any other ground recognized in [The Freedom of Information and Protection of Privacy Act](#).

5. Records may be stored for up to 30 days, unless they are being retained at the request of the Principal, Superintendent, employee, parent or student for documentation related to a specific incident or are being transferred to the Board's insurers and/or solicitors.
6. Records retained (above) shall be deleted as soon as the incident in question has been resolved. However, if the record has been used in the making of a decision about an individual, it must be kept for a minimum of one year. If the record has been used in a case of employee discipline it shall be retained for six (6) years.

C. Covert Surveillance

The above **GUIDELINES** and **PROCEDURES** do not apply to “covert “, surveillance conducted by means of hidden cameras without notice to the parties being monitored. Such surveillance shall not be conducted in the Division without consultation with Police and/or the Board’s solicitor, subject to the procedures below:

1. Covert surveillance shall only be used in cases involving suspected criminal activity and will not be used to monitor, audit or evaluate the job performance of employees of the Division.
2. Covert surveillance shall not be conducted in the Division without consultation with Police and/or the Board’s solicitor and must be authorized by the Superintendent of Schools on the grounds that covert surveillance is essential to the success of the investigation and the need outweighs the privacy interest of the persons likely to be observed.
3. Covert surveillance shall not be authorized on an ongoing basis. Covert camera devices may be left in place only as long as necessary to identify the offender(s) and obtain sufficient evidence for discipline and prosecution.
4. Where circumstances permit, individuals who are not the intended targets of the video security service shall be notified of the use of the video surveillance in advance of, or during the surveillance period by the Superintendent of Schools or Principal.
5. Following the completion of any covert period, the Superintendent of Schools may disclose that video surveillance was implemented, identifying the location and the time period involved.
6. Individuals involved in the covert surveillance operation or who are aware of the covert surveillance shall protect the confidentiality of the operation and the information obtained as a result of the security service.

Louis Riel School Division acknowledges the Pembina Trails School Division as a source for the development of this policy.

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