

Video Surveillance	
Adopted: September 7, 2004	Last Reviewed/Revised: May 17, 2022
Next Scheduled Review: 2024-2025	
Associated Policies & Procedures: VI-83 Video Surveillance I-02 Records and Information Management VI-82 Records and Information Management Procedure I-07 Protection of Privacy VI-81 Privacy Procedure VI-51 Privacy Breach Procedure II-24 Home to School Student Transportation VI-98 Student Transportation Accident Procedure II-39 Progressive Discipline and Safety in Schools Code of Conduct – Suspensions and Expulsions VI-44 Progressive Discipline and Safety in Schools	

Purpose

The Halton Catholic District School Board (HCDSB) is committed to the protection of privacy and compliance with the *Education Act*, and the *Municipal Freedom of Information and Protection of Privacy Act*, (MFIPPA), *the Provincial Code of Conduct*, *the Safe Schools Act* and any other applicable privacy legislation.

Application and Scope

This policy applies to the operation of any video system installed on any HCDSB site or HCDSB provided transportation services for the purpose of surveillance.

References

[ARMA Glossary of Records Information Management](#)

[Education Act](#)

[Information and Privacy Commissioner/Ontario Guidelines for Using for Video Surveillance](#)

[Municipal Freedom of Information and Protection of Privacy Act \(MFIPPA\)](#)

[Safe Schools Act](#)

Definitions

Control (of a video record) – means the power or authority to make a decision about the use or disclosure of a video record.

Chain of Custody – the succession of offices or persons having seizure, custody, control, transfer, analysis, and disposition of physical or electronic evidence.

Covert Surveillance – refers to surveillance conducted by legal authority.

Halton Student Transportation Services (HSTS) – joint transportation consortium that offers student transportation for eligible students in Halton.

Personal Information - recorded information about an identifiable individual including:

- Information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual;
- Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- Any identifying number, symbol or other particulars assigned to the individual;
- The address, telephone number, fingerprints or blood type of the individual;
- The personal opinions or view of the individual except if they relate to another individual;
- Correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the individual; and
- The individual's name if it appears with other personal information relating to the individual, or where the disclosure of the name would reveal other personal information about the individual.

Record - any record of information however recorded, whether in printed form, on file, by electronic means or otherwise and includes:

- Correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial, or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine-readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof; and
- Subject to the regulations, any record that is capable of being produced from a machine-readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution (document).

Retention Period – is the length of time a specific record or record series must be retained before records may be disposed of.

Retention Schedule - is a list of all the record classifications and their corresponding retention periods. The schedule also identifies which records are deemed vital, which are archival, and who is the responsible department or official record holder.

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 (this would usually include analog video, digital and closed-circuit camera systems).

Principles

1. HCDSB recognizes that the promotion of a safe and secure environment is in the best interest of students, staff and the general public.
2. HCDSB recognizes that the Education Act and the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) governs the collection, use and disposal of personal information, including the images captured on a video surveillance system
3. HCDSB recognizes that the utilization of video surveillance systems as a complement, and not to replace, other means to create a safe and secure environment and in the investigation of an incident.

Requirements

- 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 HCDSB Retention Schedule.
- HCDSB reserves the right to consider and employ lawful “covert surveillance” on a case-by-case basis in consultation with the appropriate police service.
- 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 or mode of transportation.
- All recorded video images are the property of HCDSB.
- Cameras will not monitor areas where students and staff have an expectation of privacy, such as change rooms and washrooms.
- Video surveillance systems will only be used to support the investigation of unlawful incidents taking place on school property
- Where applicable and appropriate, this policy will be incorporated into training and orientation programs of HCDSB.



Responsibilities

The following personnel are authorized to implement a video surveillance system, view surveillance footage in the discharge of their duties:

Director of Education:

The Director of Education is accountable for ensuring there is a Video Surveillance program that complies with the principles of the Municipal Freedom Information Protection Privacy Act.

Principals (or designates):

Principals or designates are responsible for ensuring secure handling of video footage and for submitting requests when access to footage is required, including completing external requests on behalf of law enforcement.

HCDSB Supervisory Officers:

Supervisory Officers are responsible for ensuring there is compliance with the policy.

Senior Manager IT Services:

The Senior Manager, IT Services is responsible for ensuring designated IT staff maintain the chain of custody of video surveillance footage.

Halton Student Transportation Services (HSTS) Manager:

The HSTS Manager is responsible for ensuring transportation providers are meeting their contractual obligations with respect to providing video surveillance systems on designated vehicles.

Privacy Records Information Management Office:

Privacy Records Information Management Office is responsible for all aspects of the HCDSB's Video Surveillance program, including control of a video record, policy development, training, and awareness.

APPROVED: Regular Meeting of the Board

AUTHORIZED BY: _____

Chair of the Board