

Video Surveillance	
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Next Scheduled Review: 2026-2027	
Associated Policies & Procedures: I-30 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-07(a) School Bus Accident Procedure II-39 Progressive Discipline and Safety in Schools VI-44 Progressive Discipline and Safety in Schools	

Purpose

The Halton Catholic District School Board (HCDSB) video surveillance procedure has been modeled on the guidelines for the use of video surveillance by the Information and Privacy Commissioner of Ontario. Its purpose is to outline the required activities involving the collection, use, retention, disclosure, and disposal of personal information captured on video surveillance cameras. These activities must follow the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Video security surveillance systems are one of many resources used by the HCDSB at selected schools, sites and on HCDSB provider transportation services to promote a safe and secure environment.

Application and Scope

This procedure applies to all HCDSB staff who collect, use, retain, and disclose personal information captured on video surveillance cameras in all facilities within the HCDSB.

Excluded from this policy:

- Video taping of school events such as graduation, theatrical productions or other similar events by the parents and families of students.
- Authorized videotaping for educational, instructional and/or research purposes.

References

[Education Act](#)

[Guidelines for the Discovery of Electronic Documents in Ontario, Colin L. Campbell](#)

[Halton Regional Police - School Protocol](#)

[Information Privacy Commissioner/Ontario Guidelines for the Use of Video Surveillance](#)

[Ontario Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990](#)

[Provincial Schools Code of Conduct](#)

[Safe Schools Act](#)

[TechTarget](#)

Definitions

- **CCTV** (Closed Circuit Television): a TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes
- **Covert Surveillance**: the use of a concealed video without an audio track for non-routine investigative purposes
- **DVR**: Digital Video Recorder
- **Legal Hold**: the secure preservation of documents, including video recordings, to prevent unauthorized access and/or tampering of evidence required for litigation or perceived expectation of future litigation
- **Personal Information**: Recorded information about an identifiable individual, which includes but is not limited to information relating to the race, national or ethnic origin, color, religion, age, or gender
- **Portable Device**: a computer drive, CD ROM, USB drive, or any other device used to store electronic information
- **Record**: Documented evidence that supports HCDSB and school decisions, regardless of format (e.g. printed form, film, electronic, or sound/video recording).
- **Retention Schedule**: A list of all the record classifications and their corresponding retention periods.
- **Video surveillance system**: 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 public.
2. The HCDSB recognizes that the utilization of video surveillance systems as a compliment, not to replace, other means to create a safe and secure environment.
3. The Provincial Code of Conduct sets clear provincial standards of behavior. These standards of behavior applied to students whether they are on school property, on school buses, at school related events or activities
4. HCDSB recognizes that the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) governs the collection of personal information, including the images captured on a video surveillance system.
5. The following personnel are authorized to implement video surveillance system in the discharge of their duties:
 - Principals (or a person designated by the Principal)
 - HCDSB Supervisor Officers
 - Director of Education
6. The closed-circuit television (CCTV) system within HCDSB facilities may operate continuously.
7. All recorded images are the property of the HCDSB.
8. Cameras will not monitor areas where students and staff have an expectation of privacy, such as change rooms and washrooms.
9. Where applicable and appropriate, this procedure shall be incorporated into training and orientation programs of the HCDSB.

Responsibilities

1. The Director of Education is responsible for the HCDSB'S overall video surveillance program.
2. The Superintendent of Facility Management Services is responsible for the life-cycle management of authorized facility video surveillance systems including the specifications, equipment standards, installation, maintenance, replacement, disposal and signage and principal training at the HCDSB sites. The Superintendent of Facility Management Services is also responsible for the technical aspects of the video surveillance systems.
3. The Manager, Privacy, Records, and Information Management Services is responsible for the development and review of the operational policy and procedure, along with the coordination and

performance of audits. The Manager, Privacy, Records, and Information Management Services is also responsible for the HCDSB's responsibilities under the applicable Acts.

4. The Principal will have access to video surveillance systems at their designated school and assigned transportation vehicles. Access to the system, where appropriate and where escalation demands, is to support the Principal in their administrative duties to provide a safe environment for students and staff. The Principal must accomplish this in accordance with HCDSB policies and procedures.
5. Halton Student Transportation Services (HSTS) Manager is responsible for ensuring transportation providers are meeting their contractual obligation with respect to providing video surveillance systems on designated vehicles. Contractual obligations include the installation and maintaining of authorized transportation video surveillance system; entering and adhering to a data sharing agreement with the HCDSB; the storage of data video footage; training of employees to meet those obligations and adhering to HCDSB policies and procedures. The HSTS manager may request an internal investigation through the Manager of Privacy and Records Management in accordance with HCDSB policies and procedures where there has been an observed or reported incident.
6. Information technology services provides Technical Support for set up and retrieval of surveillance footage as required.

Requirements

Planning Criteria for Video Surveillance Systems

1. To ensure the safety of individuals and the protection of their well-being and as a deterrent and detection mechanism against vandalism to building and property, video surveillance cameras may be used according to the following criteria:
 - To protect public security or reduce criminal and other illegal activity.
 - To deter and/ or assist in the identification of individuals that may put students, staff and public at risk at HCDSB schools and properties.
 - To respect the principles of the MFIPAA, and the Education Act.
 - To provide surveillance without limiting public activities.
 - Video surveillance may be installed without notice as part of a specific investigation where criminal activity is suspected.
2. HCDSB will endeavor to ensure the proposed design and operation of video surveillance system minimizes privacy intrusion to that which is necessary to achieve its required, lawful goals.
3. Any agreements between the HCDSB and service providers must indicate all video surveillance programs are under the HCDSB's custody and control and are subject to this policy.
4. A service provider who is in breach of this Policy and the applicable acts may lead to penalties and up to the termination of the contract. In addition, full legal action and an investigation may be required, depending on the nature of the breach of this policy.

5. An employee of a service provider must sign a written agreement regarding their duties and confidentiality under this Policy and the applicable acts.

Designing, Installing and Operating Video Surveillance Equipment

1. HCDSB will always maintain control of, and responsibility for, the video surveillance system.
2. The equipment will be installed in spaces that have been identified as requiring video surveillance.
3. Video monitor screens must not point toward unauthorized members of the public.
4. Only designated personnel will have access to the controlled location where video recordings will be stored.
5. Facility Services must conduct periodic maintenance of video surveillance equipment according to a schedule that will ensure efficient operation of the system.

Displaying Privacy Notices

1. In accordance with MFIPPA, privacy notices must be installed wherever surveillance systems are in use, including transportation services vehicles. The public must have reasonable and adequate warning that surveillance is, or may be, in operation before entering the area or entering a transportation services vehicle.
2. Notification statements must include:
 - The legal authority for the collection of personal information.
 - The principle purpose for which the personal information is intended to be used
 - The title, business address, and telephone number of someone who can answer questions about the collection. See Appendix A.
3. HCDSB will provide notice annually through the Family Information Consent form and to the public on the HCDSB website as well as a link on each of the School websites.

Establishing Security Access Controls

1. Access to the personal information collected under a video surveillance system is only provided to HCDSB authorized employees and contracted service providers with specific duties pertaining to the supervision, operation and maintenance of the system and for the proper, secure storage and destruction of video recordings regardless of the software medium used to store images.
2. All video footage uploaded from the video surveillance software must be encrypted.
3. Agreements between HCDSB and contracted service providers must state that the records created while delivering a video surveillance program are under HCDSB's control and are subject to the MFIPPA.

4. HCDSB employees and contracted service providers will comply with the requirements of this policy and the MFIPPA in performing any duties related to a HCDSB-approved video surveillance system.
5. HCDSB employees and contracted service providers will be subject to discipline, up to and including termination of employment or service to the site, for knowingly or deliberately breaching this policy or the provisions of the MFIPPA or other relevant statutes.
6. Where a service provider fails to comply with this policy or the provisions of the MFIPPA, such a failure will be considered to be a breach of contract leading to penalties that include but are not limited to contract termination.
7. HCDSB employees and the employees of service providers performing any duties related to the operation of a HCDSB approved video surveillance program are required to sign an undertaking of confidentiality. See Appendix D.

Requesting Formal Access to Video Surveillance Footage

1. All internal and external requests for video records, including requests for footage on HCDSB contracted transportation service vehicles, from parents, from other third parties, or law enforcement will be directed to the Manager, Privacy, Records and Information Management for processing and approval.
2. All requests for video surveillance footage must be in writing utilizing the HCDSB's [Electronic Video Surveillance Request Form](#). (The request will be routed to the Manager, Privacy, Records, and Information Management or designate for approval. The individual requesting the information must:
 - Provide sufficient detail, such as the approximate time and date, the location of the incident, to enable an experienced employee of the HCDSB, upon reasonable effort, to identify the record.
 - At the time of making the request, pay the prescribed fees as provided for under the Municipal Freedom of Information and Protection of Privacy Act, if required. Be advised that some requests may be denied in accordance MFIPPA provisions.
 - Expect additional fees to prepare and redact, as per MFIPPA, any information that is outside of the scope of the request.
3. When a Principal requests video footage captured on a HCDSB contacted transportation service vehicle, the request will be done through the Manager of HSTS or designate using HCDSB's Electronic Video Surveillance Request Form. The Principal must also inform the Family of Schools Superintendent of the request.
4. Access to the Digital Video Recorder (DVR) must be limited to the following:
 - Designated IT resource
 - Manager, HSTC, or designate (for DVR equipment installed on HCDSB contracted transportation service vehicles)
5. Access to digital video recordings must be limited to the following:

- Principal or Vice Principal
 - HCDSB Supervisory Officer
 - Designated IT resource (as required to prepare footage for secure sharing)
 - Manager, Privacy Records Information Management
 - Manager, Student Transportation Services (for footage captured on a HCDSB contracted Transportation vehicle)
6. HCDSB may redact or remove personal information of individuals that may have been captured on the video surveillance and would be considered exempted information by using tools and techniques such as
- Digitizing analogue footage to enable the use of more powerful editing tools.
 - Blacking out or blurring images of individuals that are not subject to the request, and
 - Removing the sound of voices

Retention of Video Surveillance Footage:

1. Recorded footage on the DVR will be maintained for a maximum of thirty (30) days.
2. All video recordings extracted for viewing and/or is required as part of an ongoing school investigation, must be retained for one year, unless a legal hold supersedes that period. Once the legal hold expires, the videos can be destroyed.

Secure Disposal of Video Surveillance Footage

1. Video surveillance footage must be securely disposed of in such a way that the personal information cannot be reconstructed or retrieved.
2. A record of destruction must be retained (Destruction records are considered permanent HCDSB records).
3. Law enforcement agencies will be required to confirm to the best of their ability whether the recording will be returned to HCDSB or destroyed.

Training

1. All staff who have access to video surveillance will receive training in accordance with the roles and responsibilities under this policy.
2. All staff in the schools and/or at HCDSB sites will receive training on video surveillance, the HCDSB's obligations, their responsibilities under MFIPPA, and how and if they may access video footage.

Audits

Procedure No. VI-83 | Video Surveillance

1. HCDSB commits to verifying compliance to the video surveillance policy and procedures through audits.
2. The Manager, Privacy, Records, and Information Management will perform regular audits and unscheduled spot audits of the Video Surveillance system, checking:
 - Position of the Video Surveillance viewing station and camera views
 - Records kept at the School or facility regarding viewing and downloading of information
 - Signage at the site
 - Access to the video system, including stored video recordings

APPROVED: Regular Meeting of the Administrative Council

AUTHORIZED BY: _____
Director of Education and Secretary of the Board

APPENDIX “A”

Notice to Students, Parents and Guardians

To: All Students, Parents and Guardians

From: School Administrator

Date:

Re: Video Surveillance

The Halton Catholic District School Board is equipped with a video surveillance system. The video surveillance system is in all Elementary and Secondary schools, as well as in all other HCDSB properties.

The purpose of the video surveillance system is to protect the well-being and security of students, staff and visitors. It is also a deterrent and identification tool for vandalism, criminal or other illegal activities. The use of video surveillance is part of an overall plan to create a safe and nurturing learning environment for all our students.

All information obtained by video surveillance is confidential and will only be provided to law enforcement authorities when criminal or other illegal acts are suspected. All video recorded material will be destroyed within thirty (30) days of being recorded unless it is used as part of an investigation.

All information is managed in accordance with the HCDSB policy for Video Surveillance, the *Municipal Freedom of Information and Protection of Privacy Act*, the *Safe Schools Act* and the *Education Act*. All HCDSB policies are available on the HCDSB's website.

For more information, please contact the Principal of your child's school or the Director of Education at 905.632.6300.



APPENDIX "B"

Destruction of Video Recorded Data Log
Date: _____
Date of Destruction: _____
Destruction by: _____

VIDEO SURVEILLANCE REQUESTS

All video surveillance, requests, including law enforcement, must be submitted using the following electronic form: <https://hcdsb.formstack.com/forms/videorequest>

Video Surveillance Request Terms & Conditions

By continuing, I have read and understood both [Procedure No. VI-83 \(Video Surveillance\)](#) and [Policy No. I-30 \(Video Surveillance\)](#).

Specifically:

1. Only principal (or a person designated by the Principal), Board Supervisory Officers, the Director of Education, the video surveillance system administrator and the Manager of Halton Student Transportation Services may view surveillance footage in the discharge of their duties
2. The CCTV system operated by the Board may operate continuously but record **only on specific motion events** 24 hours per day, 7 days a week
3. Recordings for all cameras are **available for a maximum of 30 days**
4. Cameras will not monitor areas where students and staff have an expectation of privacy, such as change rooms and washrooms
5. Cameras are adjusted such that areas outside Board/school property are not recorded and thus may not be requested
6. This request must be completed by the Officer and/or Detective in charge of the investigation with the school administrative staff (signatures will be required by both the officer and school staff member to submit the request)

*

I understand these terms and conditions

Next



Appendix “D”

Confidentiality Undertaking

I (Insert Name) am a member or representative of the Halton Catholic School Board, (called “my organization”).

I will be meeting with the Halton Catholic School Board (HCDSB) for the purpose of providing advice and recommendations to the HCDSB in respect of (Insert Role of Individual).

I acknowledge that:

- (1) I will acquire certain knowledge or receive written or oral information (called “the Information”) which is either non-public, confidential or proprietary to the HCDSB; and
(2) The interests of the HCDSB may be irreparably harmed if unauthorized parties obtain the Information.

Except as provided in the following two paragraphs of this Undertaking or as may be required by law, I undertake to keep all information confidential.

I will not, without the written consent of the HCDSB reveal or disclose the Information to anyone or use the Information either directly or indirectly for any purpose other than to provide advice and recommendations to the HCDSB in connection with my portfolio and/or area of expertise with the HCDSB.

I undertake not to copy or circulate the Information except in accordance with the written direction of the HCDSB. I will maintain all Information in a secure place and in accordance with the Education Act, and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and return it to the HCDSB upon written request to do so. I will not initiate or respond to any external inquiry relating to my portfolio (insert name of Division(s)/Department(s) under supervision).

Unless otherwise required by law or following receipt of the HCDSB’s written consent, I will not disclose to any person (other than to appropriate persons within my organization or other persons authorized by the HCDSB) any information about the HCDSB, and their partners. This includes any and all matters discussed during meetings with the HCDSB.

I acknowledge:

- (1) any delay or failure by the HCDSB in exercising its rights, powers or privileges under this Undertaking does not free me from the obligations in this Undertaking; and
(2) should the HCDSB only partially exercise its rights, powers and privileges, the partial exercise of such rights, powers or privileges does not preclude the HCDSB from exercising any other rights, powers or privileges.

I undertake to abide by the terms of this Undertaking and I declare that there is no actual or potential conflict of interest arising out of my participation in the meetings with the HCDSB.

Signature:

Witness:

Name:

Name:

Date:

Date:



Appendix "E"

Storage Device Disposal Record

Storage Device			Disposal		
ID #	Type of Device	Location In-use or Used	Method of Disposal and reason	Date and Time of Disposal	Print Name and Signature