

The maintenance of a safe and secure learning and working environment, as well as the protection of Division property and the property of others, are important functions of the Division. Individuals are to experience reasonable levels of privacy while on Division property and are to have the opportunity to learn and work in an environment that is as minimally intrusive as possible.

In balancing the actions associated with these beliefs, the Division recognizes the value of electronic surveillance systems and supports their limited use on Division property. Such use shall comply with all federal and provincial legislation, and with this administrative procedure. The Division allows the use of electronic surveillance on Division property, where circumstances have shown that it is necessary and its benefit outweighs its impact on the privacy of those observed. In addition, where a video surveillance system is employed in a school, its purpose shall be to augment, rather than to replace, direct supervision provided by members of a school staff.

This Administrative Procedure does not apply to covert or overt surveillance equipment being used by or on behalf of the Division as a case-specific investigative tool for law enforcement purposes, where there is a statutory authority and/or the authority of a search warrant to conduct the surveillance.

## **Procedures**

### **1. Camera Location, Operation and Control**

- 1.1 Division buildings and grounds may be equipped with video monitoring devices.
- 1.2 Electronic surveillance cameras may be placed in areas where surveillance has proven to be necessary as a result of prior property damages or related security incidents, and in areas where, upon reasonable grounds, the surveillance will be deemed to be a viable deterrent.
- 1.3 Electronic surveillance cameras may be positioned in areas outside of school buildings where it is necessary to protect external assets or to provide for the personal safety of individuals on school grounds or premises.
- 1.4 Electronic surveillance cameras located internally may be directed to look through windows to areas outside the building, when necessary, to protect external assets or to ensure for the personal safety of patrons or employees. Cameras shall in no event be directed to look through the windows of adjacent non-Division buildings.
- 1.5 Electronic surveillance cameras shall not be used to monitor areas where the public has a reasonable expectation of privacy, including change rooms, washrooms and private conference/meeting rooms.
- 1.6 The Superintendent or designate, which may include the Principal, shall be responsible to access the use and security of surveillance cameras.

## **2. Notification**

2.1 Signs advising users on the premises of electronic surveillance practices are to notify individuals that: 'This area is under video surveillance 24 hours a day for security purposes'.

2.2 All staff shall be made aware of the Division's electronic surveillance guidelines and practices.

## **3. Use of Electronic Surveillance Recordings**

3.1 The Division may use an electronic surveillance recording of actions by students as evidence in any disciplinary action brought against any student arising out of the student's conduct in or about Division property.

3.2 Electronic surveillance recordings of students, staff, contractors, or others may be reviewed for the purposes of determining adherence to Board policies, Division administrative procedures, and school rules.

3.3 Electronic surveillance recordings may be monitored by Division personnel on a random and non-random basis as is deemed necessary and prudent in order to ensure the safety and security of students, staff, visitors and Division property, and adherence to school rules.

3.4 The Division may use electronic surveillance to detect or deter criminal offences that occur in view of the cameras.

3.5 Electronic surveillance recordings may be released to third parties or applicants in confidence with the provisions contained in the Freedom of Information and Protection of Privacy Act of Alberta, and any rules or regulations thereunder.

3.6 The Division may use electronic surveillance and the resulting recordings for:

- 3.6.1 Inquiries and proceedings relating to law enforcement;
- 3.6.2 Deterrence; and
- 3.6.3 Student discipline;
- 3.6.4 Student Safety

3.7 The Division shall not use video surveillance for any other purposes than those listed in procedure 3.6.

## **4. Electronic Surveillance on School Buses**

4.1 Camera Location, Operation and Control:

4.1.1 The Division may equip school buses which are owned, leased, contracted and or operated by the Division with electronic surveillance devices for the monitoring of student behavior and as a means to deter vandalism and identify students or driver activity that may pose a threat to passengers and drivers' safety.

4.1.2 Buses equipped with electronic surveillance devices may be placed on a route used for the transportation of students when the administrators have received

complaints of inappropriate behavior or have reason to believe that behavior problems exist or are about to occur.

4.1.3 Electronic Surveillance equipment shall be in operation continuously.

## **5. Viewing of Electronic Surveillance**

5.1 An individual who is the subject of electronic surveillance has the right to request access to the video recording in accordance with the provision of the Freedom of Information and Protection of Privacy Act. Access in full or in part may be refused on any of the grounds set out within the legislation.

5.2 Parents or guardians may review a segment of electronic recording related to a specific incident involving their child or children, unless the review might violate the privacy of a third party. In that case, the review is not to take place unless authorized by the Division Freedom of Information and Protection of Privacy Coordinator.

5.3 Electronic monitors used to view electronic recordings shall not be located in a position that enables public viewing. Electronic recordings may only be viewed by:

5.3.1 The Principal or designate or individual authorizing camera installation;

5.3.2 Parents and students

5.3.3 Division personnel authorized by the Superintendent or designate to view the contents of specific electronic recordings;

5.3.4 Law enforcement officers who have been given access to electronic recordings by the Principal or other designated official;

5.3.5 Employees or agents of the Division who have responsibility for the technical operations of the system (for technical purposes only)

5.3.6 A representative or other advocate authorized by an individual facing disciplinary action to view a specific electronic recording.

5.4 Any request from law enforcement authorities for release of a Division electronic recording, or live electronic monitoring, must be referred to the Superintendent, or Designate.

5.4.1 In the case where a request has been made to remove a recording from the Division's possession, the Electronic Surveillance Authorization to Access Form 131-1 must be completed before the electronic recording is released.

5.5 When an electronic record is being reviewed a log must be kept that lists the following information:

5.5.1 The individual viewing the record

5.5.2 The reason why the record is being viewed.

## **6. Retention of Electronic Recordings**

- 6.1 Electronic recordings shall be erased or otherwise disposed of within ninety (90) days, unless they are being retained at the request of the Principal, Division official, employee, parent or student for documentation related to a specific incident, or are being transferred to the Division's insurers.
- 6.2 Electronic recordings retained under 5.1 above shall be erased or otherwise disposed of as soon as the incident in question has been resolved, except when the electronic recording has been used in the making of a decision about an individual.
- 6.3 Electronic recordings that have been used to make a decision directly affecting an individual shall be retained for a minimum of two (2) years.
- 6.4 Where an incident raises a prospect of a legal claim against the Division, the electronic recording, or a copy of it, shall be sent to the Division's insurers.
- 6.5 Electronic recordings shall be disposed of in a secure manner.

## **7. Review**

- 7.1 Each Principal is responsible for the proper implementation and control of the electronic surveillance system at a particular site.
- 7.2 The Superintendent or designate shall conduct periodic reviews to ensure that this administrative procedure is being followed.
- 7.3 All operations are subject to audit and principals may be called upon to justify any aspect of their use of electronic surveillance
- 7.4 All Division electronic monitoring shall be carried out in accordance with this administrative procedure. The Division will not accept the improper use of electronic surveillance and will take appropriate action in any cases of wrongful use of this administrative procedure.

Created December 2023

Reference: Section 33, 52, 53, 68, 197, 222 Education Act  
[Freedom of Information and Protection of Privacy Act](#)  
Wolf Creek School Division Administrative Procedures 181, 182  
Foothills School Division Administrative Procedure 181  
Evergreen Catholic Separate School Division Administrative Procedure 181