

Toronto District School Board

Operational Procedure PR.694 SCH

Title: **VIDEO SURVEILLANCE**

Adopted: November 5, 2005

Revised:

Authorization: Executive Council

1.0 OBJECTIVE

To establish a process to be followed for the use of video surveillance systems

2.0 DEFINITIONS

Video surveillance systems A video, physical or other mechanical, electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals in school buildings and on school property (in TDSB schools this would usually be analog video, digital and closed-circuit camera systems)

3.0 RESPONSIBILITY

Associate Director

4.0 PROCEDURES

- 4.1. The use of video surveillance in public places is permitted provided that institutions comply with the *Municipal Freedom of Information and Protection of Privacy Act* (see Reference Documents and Appendix A)
- 4.2. Video surveillance systems will be used according to the following criteria:
 - (a) to respect the principles of the *Municipal Freedom of Information and Protection of Privacy Act* that governs school boards;
 - (b) to provide general surveillance without limiting general public activities/
 - (c) to reduce criminal and other illegal activity;
 - (d) to act as a deterrent against vandalism to buildings and property;
 - (e) to maintain a balance between the advantages of video surveillance for the public and the specific right to protect privacy;
 - (f) to regularly review and evaluate the video surveillance program in order to ascertain if continued use is justified in accordance with the requirements for collecting personal information.

4.3. Acquiring Video Surveillance Systems

- (a) Prior to installation of the system, students, school councils, parents and guardians, and the broader school community will be consulted about the necessity of the camera system including proposed locations.
- (b) Criteria for approval will be followed including, installation and/or upgrades of a permanent, temporary or closed-circuit system as established by the Video Surveillance Criteria Committee (see Appendix Bxxx).
- (c) (Form xxxA, Security Infrastructure Request) will be submitted to the Security Infrastructure Steering Committee for consideration (see Appendix C).
- (d) Installation of the camera system will be arranged with the Facility Services department.
- (e) Training will be provided by the vendor in collaboration with the Safe Schools department for the operation of the system, and with Legal Services for compliance with the *Municipal Freedom of Information and Protection of Privacy Act*.

4.4. Existing and Future Video Surveillance Systems

- (a) An administrative staff member will be appointed, either the school principal or vice-principal, to be responsible for the video surveillance system in the school.
- (b) Assigned staff will maintain control and be responsible for the system at all times.
- (c) Staff responsible for the surveillance system will be familiar with the *Municipal Freedom of Information and Protection of Privacy Act* (see Reference Documents and Appendix A).
- (d) The location of each camera will be reviewed periodically to determine if the installation is still justified.
- (e) The confidential nature of information contained on the analog video and digital camera systems will be preserved.
- (f) Personnel will be trained using the system and their obligations outlined under the *Municipal Freedom of Information and Protection of Privacy Act* and these procedures.
- (g) Once every three year, justification for continued use of the video surveillance system will be assessed and the Safe Schools department will be consulted when doing this assessment.

- (h) Contact the Board's Freedom of Information Officer about specific details, infractions or concerns related to the *Municipal Freedom of Information and Protection of Privacy Act*.

4.5. Video Surveillance System Installation and Operations

- (a) Cameras will be installed in public areas only, i.e., entrances, exits, parking lots, hallways, cafeterias, auditoriums and libraries.
- (b) Cameras may be installed in classrooms with large inventories of equipment, books, etc., as well as labs, shops, offices, receiving and reception areas.
- (c) Orientation of cameras toward adjacent buildings should be avoided. Cameras will not be installed in washrooms or change rooms, however, they may be installed in adjacent corridors to monitor traffic in and out of these areas.
- (d) Signs will be posted in visible locations notifying the public of the presence of video surveillance systems (see Appendix D). (See also Note at end of this section)
- (e) Information will be provided to students, parents and guardians of the legal authority to justify the use of surveillance equipment. This could be included in a registration letter, student planner or school newsletter (see Appendix E).
- (f) Monitors will be located in a controlled access location outside of public view. Only designated personnel may have access to this location and to recorded material.
- (g) Closed-circuit systems with motion trigger alerts will be placed in the principal's office or the school's main office area only.
- (h) Tapes will be recorded-over or destroyed within 30 days unless required as part of an ongoing investigation.
- (i) Digital computer camera data recorded on computer hard drives or other media, will be deleted within 30 days of the recording during the regular school year. If there is an ongoing investigation, the video data will be recorded on to a CD-ROM and stored in a controlled access location.
- (j) Tapes and CD-ROMs will be stored in a locked container situated in a controlled-access location.
- (k) Tapes and CD-ROMs will be individually dated.
- (l) If a tape or CD-ROM is viewed, a journal (Form xxxB, Control of Recordings Journal) will be kept to record the date, time, camera location, and the uses of the recordings to allow future identification.
- (m) Periodic maintenance of video surveillance systems will be performed by Facility Services staff based on a schedule that will ensure efficient operation of the system.

Note: Video surveillance systems may be installed without notice as part of a specific investigation where criminal activity is suspected.

4.6. Investigation or Disciplinary Action

If the video tape or CD-ROM is requested as part of an investigation or disciplinary action, the appropriate quadrant Safe Schools Office will be contacted.

4.7. Use of a Video Tape or CD-ROM in an Investigation

The following procedures ,which will be included in the Safe Schools Procedure Manual, will be reviewed:

- (a) When using a video tape or CD-ROM as part of an investigation or disciplinary action, the parent, guardian and student must be able to view the tape in question with school personnel; however, the confidentiality of others must be protected.

Should it become necessary to allow a parent or guardian to view a videotape or CD-ROM where the confidentiality of others must be protected, the following options may be considered:

- (i) seek permission from the other party(s)
- (ii) digitally enhance the tape to block the identity of the person(s)

Note: An exception under *MFIPPA* may be sought through the Board's Freedom of Information Officer to refuse access to the contents of the tape should reasonable conditions warrant. Access to an individual's personal information in these circumstances may depend upon whether any exempt information can be reasonably removed from the video tape or CD-ROM.

- (b) Keep the video tape or CD-ROM containing elements of proof in a locked secure location to ensure integrity of information should police authorities request them.
- (c) Complete an authorization (Form xxxC, Release Authorization) before releasing a video tape or CD-ROM to police authorities noting the name of the person, their authority and the date of the release of the tape or tapes and date of return.
- (d) In consultation with the Board's Freedom of Information Officer, give access to personal information recorded on tapes or CD-ROM in accordance with Article 36 of the Act or refuse access according to Article 38 of the Act to those who wish to review personal information on recorded tapes that are relevant to them.

- (e) Every three years, the School Administrator shall review with the Safe Schools Department, procedures in respect to the use of, and security of, video surveillance tapes, and whether the deployment of cameras remains justified.
- (f) If videotapes or CD-ROMs are used as part of an investigation, they must be kept for at least one year. After the year has elapsed, these tapes or CD-ROMs will be destroyed unless there are other legal requirements that they continue to be kept for a longer period of time.

5.0 APPENDICES

Appendix A: Excerpts From the *Municipal Freedom of Information and Protection of Privacy Act* and “Guidelines for Using Video Surveillance Cameras in Schools” (see also Reference Documents below)

Appendix B: Criteria for Installation of Video Surveillance Systems

Appendix C: Security Infrastructure Approval Process

Appendix D: Signage Information

Appendix E: Sample Memo to Students, Parents and Guardians in Schools With Video, Digital or Closed-circuit Camera Systems

6.0 REFERENCE DOCUMENTS

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Chapter M.56 http://www.e-laws.gov.on.ca/DBLaws/Statutes/English/90m56_e.htm

“Guidelines for Using Video Surveillance Cameras in Schools,” Information and Privacy Commissioner/Ontario, December 2003
<http://www.ipc.on.ca/images/vidsch-e.pdf>

Appendix A

Excerpts From the *Municipal Freedom of Information and Protection of Privacy Act* and
“Guidelines for Using Video Surveillance Cameras in Schools”

Municipal Freedom of Information and Protection of Privacy Act

The Ontario Information and Privacy Commissioner has sanctioned the use of video surveillance in public places provided that institutions comply with the *Municipal Freedom of Information and Protection of Privacy Act*.

Section 29(1) of the *MFIPPA* authorizes the collection of personal information without the consent or knowledge of individuals to whom the information relates. Section 29(1), in part, provides:

An institution shall collect person information only directly from the individual to whom the information relates unless

- (f) the information is collected for the purpose of conduct of a proceeding or a possible proceeding before a court or judicial or quasi-judicial tribunal:
- (g) the information is collected for the purpose of law enforcement.

Guidelines for Using Video Surveillance Cameras in Schools

The Information and Privacy Commission of Ontario has published "Guidelines for Using Video Surveillance Cameras in Schools" with reference to *MFIPPA*. Section 4 of the Guidelines deals with Considerations Prior to Using A Video Surveillance System. It states before deciding to use video surveillance, it is recommended that institutions note the following:

- A video surveillance system should only be considered after other measures of deterrence or detection have been considered and rejected as unworkable.
- Video surveillance should only be used where conventional means for achieving the same law enforcement or public safety objectives are substantially less effective than surveillance or are not feasible, and the benefits of surveillance substantially outweigh the reduction of privacy inherent in collecting personal information using a video surveillance system.
- The use of each video surveillance camera should be justified on the basis of verifiable, specific reports of incidents of crime or significant safety concerns.
- An assessment should be conducted of the effects that the proposed video surveillance system may have on personal privacy, and the ways in which the adverse effects may be mitigated.
- Consultations should be conducted with relevant stakeholders as to the necessity of the proposed video surveillance program and its acceptability to the public.
- Institutions should ensure that the proposed design and operation of the video surveillance system minimizes privacy intrusion to that which is necessary to achieve its required, lawful goal.

Appendix B-1

Criteria for Installation of Video Surveillance Systems

Three types of video surveillance system installations have been identified as follows:

Permanent System Video recording system consisting of multiple interior and exterior cameras and head end, with monitor(s) located in the administration area.

Temporary System Video recording system consisting of one or more interior and/or exterior camera and head end, with monitor(s) located in the administration area, intended to be short term to support specific investigations.

Closed-circuit System Low cost video monitoring system consisting of one or more interior cameras and monitors in administration area, without recording capability.

Permanent System

(a) Rationale

To act as a deterrent and assist in prosecution of physical aggression and/or property damage. The committee recommends that budget allocations set aside a 20% contingency to allow staff to address exceptional urgencies as required, and then allocate to each quadrant the following proportion of available funds based on LOI and enrollment (NE 22%, NW 29%, SE 24%, SW25%). Twenty percent of quadrant allocation should be applied to elementary schools and 80% to secondary.

(b) Approval Criteria

Criteria for prioritizing secondary and elementary schools should be based on the number of incidents of personal injury and/or threat and/or property damage. To do this, the committee recommends scoring schools based on the following compiled reports:

- Crisis Reports (Source: Safe Schools)
- Damage and Loss Reports (Source: Safe Schools)
- Security Reports (Source: FS Security)
- SAP PM Vandalism Reports (Source: FS SCE)
- TDSB Mandatory Expulsions (Source: Safe Schools)

The committee recommends scoring one point for each property damage incident, two points for each personal violence (crisis/suspension/expulsion) incident. After completing quantitative incident review, the committee recommends that consideration be given to Hall Monitor Index and Principal's anecdotal community characteristics/unique circumstances report prior to final prioritization for budget allocation.

Temporary System

(a) Rationale

Temporary video installations would be recommended where a school is not a priority for a permanent installation and there is known risk under investigation of theft or significant property damage at a specific location and risk is immediate (ex. graffiti) or ongoing (ex. glass breakage).

(b) Approval Criteria

Criteria for assessing schools should be based on a Principal's request and the number and/or severity of incidents of property damage. To do this, the committee recommends ranking schools based on the Principal's request, supported by the Safe Schools Advisor:

- Damage and Loss Reports (Source: Risk Management)
- Security Reports (Source: FS Security)

Closed-circuit System

(a) Rationale

Closed-circuit systems should be considered for (primarily elementary) schools during normal hours of operation at unlocked entrances. Monitors (with motion triggered alerts) would be placed at the Principal's and Office Administrator's workstations. The committee believes cameras in these locations will have a deterrent effect and improve safety and supervision. The committee recommends that a pilot installation site be identified and assessed. If successful, systems should be installed in all elementary schools on a programmed basis that ensures equity. The committee recommends that CUPE Unit C should be consulted to get their buy-in to this new administrative function

(b) Approval Criteria

Criteria for prioritizing schools should be based on the number of intruder incidents and Learning Opportunities Index (LOI).

Security Infrastructure Approval Process

A: Approval Process

1. Executive Superintendent, Facility Services sets an annual Renewal Budget for security related issues.³
2. School Principal identifies in consultation with the Safe Schools Committee the security infrastructure need(s), and involves Safe School Advisor and Family Team Leader to assess the need and recommend a security improvement.
3. School Principal, in consultation with the Safe Schools Committee together with the Safe Schools Advisor, submits security infra-structure request to the School Superintendent for approval.
4. School Superintendent, if supporting the request, forwards the completed security form (Form A, Security Infrastructure Request) to the Central Coordinating Principal – School Services.
5. Central Coordinating Principal – School Services reviews request with the Security Infrastructure Committee. If approved, work is recorded and scheduled for follow up.
6. Committee members consult their reference groups, assess scope, prepare cost estimates, decide on funding and advise school principal of decision. If approved, work is recorded and scheduled for completion.
7. Committee members monitor expenditures and when the annual budget is expended, a prioritized backlog list is maintained, until more funding is approved.

B: Security Infrastructure Items

- (i) Lighting
- (ii) Motion Detectors
- (iii) Fire Alarm Covers
- (iv) Key Controls
- (v) Card Access Entry
- (vi) Photo I.D. Cards
- (vii) Fixed Video Camera
- (viii) Mobile Video Camera
- (ix) Fencing
- (x) Gates
- (xi) Security Patrols

C: Security Infrastructure Steering Committee

- General Manager, Facility Services
- Central Coordinating Principal – School Services
- Manager, Design & Construction
- Manager, Central Services
- Manager, Standards, Compliance & Environment
- Projects Administrator
- Central Services Co-ordinator
- Manager, Business & Facilities
- Safe School Advisors
- Business Analyst

D: Reference Groups

- Safe Schools Team
- Systems Response Team
- Emergency Preparedness Advisory Committee
- Security Team
- Electronics Team
- Design & Construction Team

Appendix D

Signage Information

Signage as per TDSB procedures:

Metal signs are placed above the entrance doors

Additional signs may be ordered from E-Catalogue on TDSBweb

Video Surveillance

4" x 11.75" self adhesive vinyl decals for windows and glass doors

Cost: \$ 15.00



Appendix E

Sample Memo to Students, Parents and Guardians in Schools With Video, Digital or
Closed-circuit Camera Systems

[Insert School Letterhead]

[date]

Dear _____:

This building is equipped with a video/digital/closed-circuit camera system to provide protection for the well being and security of individuals, and as a deterrent to vandalism, criminal acts or other illegal activities.

All information obtained by the camera system is confidential and will only be transmitted to police authorities when criminal or other illegal acts are suspected. All tapes or digital images will be destroyed within 30 days of being recorded unless they are used as part of an investigation.

All information is managed in accordance with the Toronto District School Board's procedure PR.694: Video Surveillance and the *Municipal Freedom of Information and Protection of Privacy Act*.

For information please contact:

Name of Person Responsible [school administration]

Address _____

Telephone No. _____