

Security Cameras and Digital Imagery

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Procedure Owner:	Information Technology Services
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Resources:	• TVDSB Privacy and Records Information Management (2014) • TVDSB Records Information Management Procedure (2014a) • TVDSB Privacy and the Management of Personal Information Procedure (2014b) • TVDSB Privacy Breach Protocol Procedure (2014c) • TVDSB Security Cameras and Digital Imagery Policy (2017) • TVDSB Information Technology Appropriate Usage and Electronic Monitoring Procedure (5017b) • Municipal Freedom of Information and Privacy Act Ontario Regulation 823

1. Intent

- 1.1. The intent of this procedure is to ensure the safety and security of students, staff, and visitors at Thames Valley District School Board (TVDSB) sites and schools. This procedure aims to deter and prevent acts of vandalism, theft, and other criminal activities by providing a visible and effective monitoring system.

- 1.2. Additionally, the procedure is designed to comply with relevant privacy laws and regulations, ensuring that the collection, retention, use, and disclosure of personal information are conducted lawfully and ethically.

2. Definitions

- 2.1. **Auditable Log** is a detailed record that tracks user activities and system operations. It typically includes information such as the identity of the user, the actions performed, the time and date of those actions, and any changes made to the system.
- 2.2. **Authorized Agency** refers to any duly constituted criminal investigative department or agency, such as law enforcement, regulatory bodies, or other governmental entities, that has the legal authority to access and use certain information or perform specific actions.
- 2.3. **Authorized Personnel** are individuals designated by TVDSB to access security camera systems and recordings.
- 2.4. **Covert Surveillance** is surveillance conducted by means of hidden devices, without notice to the individual(s) being monitored on TVDSB property or within TVDSB buildings.
- 2.5. **Electronic Imagery** refers to the creation, processing, storage, and display of digital representations of visual characteristics of objects. This includes digital photographs, videos, and other forms of digital images stored and/or administered TVDSB infrastructure, equipment and/or devices that can be manipulated and analyzed using computer software.
- 2.6. **Personal Information** is recorded information that can identify an individual. This includes details such as name, address, phone number, race, ethnic origin, religious or political beliefs or associations, age, sex, sexual orientation, mental status, family status, any identifying number or symbol (e.g., Social Insurance Number (SIN)), fingerprints, blood type, or inheritable characteristics. It also encompasses medical history, educational, financial, criminal, or employment history, personal views or opinions (unless they are about someone else), and anyone else's opinion about that individual.

- 2.7. **Record** is any information, however recorded, whether in printed form, on film, by electronic means, or otherwise. This includes a photograph, a film, a microfilm, and a videotape.
- 2.8. **Storage Device** stores visual, audio, or other data captured by a security camera system, and may include both on-premises and cloud-based infrastructure.
- 2.9. **Security Camera System** is a video, physical or other mechanical, electronic, digital system or device that is administered by Information Technology Services staff and enables continuous or periodic video recording, observing or monitoring of activities in TVDSB schools and sites.
- 2.10. **Video footage** refers to the recorded data captured by a security system or security camera. This includes visual, audio, or other images electronically stored.

3. Objective of Procedure

- 3.1. The objectives of the TVDSB video security camera procedure:
 - 3.1.1. To maintain transparency in the use of security video systems and ensure accountability in their operation and management.
 - 3.1.2. To ensure that the security video system operates in accordance with relevant privacy laws and regulations, collecting only the data necessary to achieve the intended goals.
 - 3.1.3. To manage the collection, retention, use, and disclosure of video footage data in a lawful and ethical manner, ensuring the protection of personal information.

4. Roles and Responsibility

- 4.1. **General Manager of Information Technology Services** ensures that the installation, maintenance, and operation of security camera systems and digital imagery comply with this procedure.
- 4.2. **Information Technology Services** provides technical support for the installation and maintenance of security camera systems.

- 4.3. **Site Administrators or Designates** are responsible for operating the security camera system at their respective TVDSB schools or non-school sites.
- 4.4. **Records and Privacy Officer** ensures that the collection, use, and disclosure of personal information captured by security cameras comply with privacy laws and regulations.
- 4.5. **Security Camera Committee** is a committee consisting of TVDSB staff from various board departments such as Human Resource, Information Technology Services, Facilities, Safe Schools and School Administration, which review and prioritize the allocation of security cameras for new deployments and replacements of existing systems at board locations across the district, in alignment and adherence with the Thames Valley District School Board Security Cameras and Digital Imagery Policy (2017) and this procedure.
- 4.6. **Freedom of Information Coordinator** ensures that requests for access by third parties and by individuals follows the board's process for releasing video recordings that may contain personal information.

5. Security Cameras and Digital Imagery Procedures

- 5.1. Included below Sections 6 through 13 are the TVDSB are the Security Cameras and Digital Imagery Procedures

6. Considerations Prior to Using Security Cameras:

- 6.1. Before implementing security cameras at a school or other location the Principal or Site Administrator or designates working with the Security Camera Committee will:
 - 6.1.1. consider use of security cameras when less intrusive means of deterrence has been implemented and proven to be ineffective.
 - 6.1.2. provide evidence of incidents occurring in the school or site to justify the use and extent of use of security camera equipment to deal with or prevent future incidents. Where security cameras are being deployed for secured controlled access to TVDSB buildings and sites, provision of evidence of incidents will not be required.

7. Design, Installation and Operating Security Cameras:

- 7.1. Design and positioning of the approved security cameras will be determined in consultation with the Principal or Site Administrator or designates, the General Manager of Information Technology Services or designate and other TVDSB staff as deemed appropriate.
- 7.2. In designing, installing and operating security cameras, TVDSB will:
 - 7.2.1. install equipment only in identified public areas where security cameras are considered necessary to ensure the safety of students, staff, and TVDSB property.
 - 7.2.2. ensure that the proposed design and operation of the security cameras minimize privacy intrusion to that which is necessary to provide protection and safety.
 - 7.2.3. equipment will not be set up in areas where students, staff, and the public have an expectation of privacy (e.g., washrooms, classrooms, office spaces, prayer rooms and locker rooms).
 - 7.2.4. prominently display signs at the entrances and/or the interior and/or exterior of buildings and on third party service provider where TVDSB security cameras are operating to provide students, staff, and the public with reasonable and adequate notice and inform them that they may contact the Site Administrator or TVDSB's Privacy Officer with any questions about the collection of security camera footage (Appendix A).
 - 7.2.5. ensure all security cameras are maintained and operating as expected.
 - 7.2.6. the Principal or Site Administrator or their designates will be responsible for reporting to the Information Technology Services Department through their service support management system any issues or concerns regarding the performance of such equipment.
 - 7.2.7. operate the security equipment 24 hours each day, 7 days a week, within the limitations of system capabilities, power disruptions and maintenance

periods.

8. Electronic Imagery and Video Footage

- 8.1. Included below in Sections 9 through 14 are the procedures for the use, security, access, disclosure, retention and disposal of electronic imagery and video footage.

9. Use of Electronic Imagery and Video Footage

- 9.1. Any electronic imagery and video footage information obtained by way of a security camera and/or other device administered by Information Technology Services may be used in accordance with this with TVDSB Security Cameras and Digital Imagery Policy (2017) and this procedure.
- 9.2. Third party service providers that have electronic imagery and/or video footage services and/or equipment installed, must sign an agreement satisfactory to TVDSB regarding the collection, use, disclosure and security of the personal information collected that complies with this policy and procedure.
- 9.3. A Privacy Impact Assessment (PIA) will be completed before the TVDSB enters into an agreement with any third-party service provider.
- 9.4. Viewing of electronic imagery and/or video footage shall be in accordance with this procedure. Circumstances which warrant review will be limited to an incident that has been reported or observed, to investigate a potential crime, or in response to Freedom of Information request.
- 9.5. Electronic imagery and/or video footage may be accessed to investigate matters related to staff and student conduct that are likely to result in a law enforcement and/or TVDSB investigation.
- 9.6. This procedure is not meant to address or apply to instances where staff electronically record and/or capture a specific event (such as a school performance, graduation ceremony or field trips).

10. Security of Records

- 10.1. Storage devices and repositories containing electronic imagery and/or video footage are to be stored securely with access limited by the Principal or Site Administrator or their designates and other Authorized Personnel.

11. Accessing Electronic Imagery and Video Footage

- 11.1. Site Administrator or designates and Authorized Personnel will ensure that electronic imagery and/or video footage is accessible only to Authorized Personnel.
- 11.2. If electronic imagery or video footage is needed to resolve a security or safety issue, or to respond to a Freedom of Information request, it will be securely stored for a length of time according to the retention schedule outlined in the TVDSB Records Information Management Procedure (2014a).
- 11.3. Site Administrator or designates and Authorized Personnel shall ensure that any recorded electronic imagery and/or video footage accessed or disclosed by Authorized Personnel is dated with a unique, sequential number or other verifiable symbol (e.g., watermark).
 - 11.3.1. A log will be maintained to record all instances of access to, and use of, recorded material.
 - 11.3.2. This does not apply to the viewing of a live feed of electronic imagery and/or video footage.
- 11.4. When real-time viewing of the electronic imagery and/or video footage is necessary, the authority to view the data will be granted by the Principal or Site Administrator or their designates to authorized personnel to assist in resolving a security and/or safety issue.
- 11.5. Electronic imagery and/or video footage will not be viewable by the public.
- 11.6. Individuals whose personal information has been collected by a TVDSB electronic imagery and/or video footage device have the right of access to their personal information under Section 36 of Municipal Freedom of Information and Privacy Act Ontario Regulation 823.

11.7. Access may be granted to an individual's own personal information in whole or in part, unless an exemption applies under Section 38 to Municipal Freedom of Information and Privacy Act Ontario Regulation 823 where, for example, disclosure would constitute an unjustified invasion of another individual's privacy.

11.8. Access to an individual's own personal information may also depend upon whether any exempt information can be reasonably severed from the record. Requests for access to electronic imagery and/or video footage must be requested through the TVDSB's Freedom of Information request process.

11.9. Authorizing the Release of Imagery and Video Footage

11.9.1. Viewing of recorded information will be limited to the Site Administrator or their designates, Authorized Personnel, and Authorized Agencies as required or permitted by law, where necessary.

11.9.2. Circumstances that warrant viewing will be limited to an incident that has been reported/observed, to investigate a potential crime, or in response to a Freedom of Information request.

11.9.3. Electronic imagery and/or video footage may be disclosed to an Authorized Agency under the following circumstances. In all cases, an auditable log will be completed by the Principal or Site Administrator or their designates and shared with the TVDSB's Records and Privacy Officer.

11.9.3.1. The Authorized Agency approaches the Principal or Site Administrator or their designates or Information Technology Services General Manager with a warrant and/or production order requiring the disclosure of the electronic imagery and/or video footage.

11.9.3.2. The Authorized Agency approaches the Site Administrator or their designates or Information Technology Services General Manager, without a warrant or production order, and requests the electronic imagery and/or video footage be disclosed to aid an investigation from which a proceeding is likely to result.

11.9.3.3. An activity that endangers health and safety of staff and/or students has occurred on TVDSB property and the electronic imagery and/or

video footage is disclosed to an Authorized Agency to aid an investigation.

11.9.4. The Site Administrator or their designate will ensure record of the electronic transmission of video electronic imagery and/or video footage is maintained, when this information is disclosed to Authorized Personnel.

11.9.5. Any unauthorized viewing or disclosures of personal information shall be reported immediately to the TVDSB's Privacy Officer. The matter shall be investigated as per TVDSB Privacy Breach Protocol Procedure (2014c).

12. Covert Surveillance

12.1. Covert surveillance, such as hidden cameras or cameras installed without notification, is highly privacy-invasive and is not a standard practice of Thames Valley District School Board (TVDSB). It will only be used as a last resort in limited, case-specific circumstances.

12.2. All requests for covert surveillance must be submitted to the Director of Education or their designate for approval.

12.2.1. The request must clearly describe the rationale and the timelines for the surveillance.

12.2.2. A review of the request will be conducted to evaluate the privacy impacts associated with the implementation of covert surveillance.

12.2.3. This review aims to ensure that covert surveillance is the only available option under the circumstances and that the benefits derived from the personal information obtained outweigh the violation of privacy of the individual(s) observed.

13. Monitoring and Review

13.1. The monitoring and review of this Procedure is based on the objectives outlined in Section 3.0.

13.2. The Information Technology Services Department will be responsible for monitoring, reviewing and recommending changes to this Procedure to ensure alignment with

legislative changes, information technology practices and/or Ministry of Education directives.

14. List of Appendices

14.1. Appendix A: Notice of Security Camera Monitoring and Collection of Data

Appendix A – Notice of Security Camera Monitoring and Collection of Data

The following will be located at the entrances of all TVDSB buildings.

This property is monitored by 24-hour security camera technology.

Security cameras are in operation for the safety of the students, staff and the school community and for the protection of Thames Valley District School Board property. Information is collected under the authority of the Education Act in compliance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). For additional information please contact the Principal/Supervisor of this site.

Contact information is available in the office/front desk or visit our website – www.tvdsb.ca.