

## Lower Merion School District

### ADMINISTRATIVE REGULATIONS

Policy No.:	705
Section:	PROPERTY
Title:	SAFETY AND SECURITY
Date Adopted:	5/10/19
Date Revised:	12/18/23

#### R705 SAFETY AND SECURITY

The District's approach to school safety and security is defined by ongoing preparedness, meaning continuous review and assessment of our strategies to prevent and, when necessary, respond to crisis situations through appropriate protection, mitigation, and recovery measures. Underlying this approach is our commitment to cultivating a climate of inclusivity and belonging for all students, families, and staff, which prioritizes our goal of student safety and security while balancing the rights and dignity of each and every student to the greatest extent possible.

The purpose of this Administrative Regulation is to summarize key components of the District's Safety and Security Plan and is organized as follows:

- **Section A, GENERAL SAFETY PLANNING and PREPAREDNESS:** This section includes information regarding overall strategy, planning, and assessment of safety and security threats.
  - A.1. School Safety and Security Coordinator
  - A.2. Emergency Operation Plans
  - A.3. Safety Committees
  - A.4. Routine Drills and Staff Training
  - A.5. Partnerships with Police, Fire, and EMS
  
- **Section B, PROTECTION SYSTEMS AND SECURITY:** This section highlights some of the District's approaches to physical safety and emergency readiness.
  - B.1. Photo Identification Badges
  - B.2. Key Control
  - B.3. Internal/External Locks/Electronic Door Access
  - B.4. Guest/Visitor Access to School District Buildings
  - B.5. Cameras and Recording Systems
  - B.6. Security Personnel
  - B.7. Communication Devices
  - B.8. Building Maintenance and Repair
  
- **Section C, PREVENTION AND MITIGATION MEASURES:** This section includes reference and summary information regarding the District's health and wellness-related student programming, supports, and services that support a safe and secure environment for all students.
  - C.1. Student Wellness Committee
  - C.2. District Threat Assessment Committee
  - C.3. School-Based Student Programming and Services

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- School Counseling Services
- School Psychologists
- Mental Health Services
- School Social Workers
- Student Assistance Referral Process (START)
- Other Safety-Related Student Programming and Services
- C.4. Role of Students in Promoting School Safety, Security and Climate Conducive to Learning
- C.5. Fostering Relationships with Local/Regional Crisis Response Agencies
- **Section D, RESPONSE AND RECOVERY:** This section summarizes steps beyond those outlined above that relate to response and recovery efforts connected to a crisis situation.
  - D.1. Procedures for Parents/Guardians to Follow During Emergency Situations
  - D.2. Inclement Weather Procedures and Notification System
  - D.3. Reporting Concerns or Suggestions Regarding School Safety or Security

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**A. GENERAL SAFETY PLANNING AND PREPAREDNESS**

**1. School Safety and Security Coordinator**

The Public School Code requires the Superintendent to appoint a school administrator as the school safety and security coordinator for the District. The Superintendent designates the Supervisor of School Safety and Security to serve in this capacity.

As the designated school safety and security coordinator, the Supervisor of School Safety and Security shall have the following duties, and shall report directly to the Superintendent with respect to these duties:

- Oversee, as applicable, all school police officers, resource officers, and security guards;
- Review the District’s policies and procedures relative to school safety and security and compliance with federal and state laws regarding school safety and security;
- Coordinate training and resources for students and staff in matters relating to situational awareness, trauma-informed education awareness, behavioral health awareness, suicide and bullying awareness, substance abuse awareness, and emergency procedures and training drills, including fire, natural disaster, active shooter, hostage situation and bomb threat.
- Coordinate school safety and security assessments, as necessary.
- Serve as the liaison with the statewide School Safety and Security Committee, the Pennsylvania Department of Education, law enforcement and other organizations on matters of school safety and security.
- Make a report, no later than June 30 each year, to the Board on the District’s current safety and security practices and strategies to improve school safety and security. The report shall be presented to the Board at an executive session, and such report shall be submitted to the statewide School Safety and Security Committee and not subject to the Right-to-Know law.
- Coordinate a tour of the District’s buildings and grounds biennially, or when a building is first occupied or reconfigured, with the law enforcement agencies and first responders that are primarily responsible for protecting and securing such school to discuss and coordinate school safety and security matters.

**2. Emergency Operation Plans (EOP)**

Every school in the District, as well as the District’s administration building, shall have a comprehensive emergency operation plan (EOP), drafted with input from local and regional

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emergency management officials. EOPs shall include emergency procedures and directives, including drill guidelines and response protocols. Each classroom in the District shall have a copy of the EOP relevant to their school building. Each EOP shall be reviewed and updated annually, if necessary, by the applicable safety committee, as outlined in more detail in Section A.3., below.

Additionally, age-appropriate safety posters shall also be displayed throughout each school building outlining the appropriate response(s) to a variety of emergency situations that could arise in the school setting.

**3. Safety Committees**

- a. School-Level Safety Committee: Each school in the District shall have a safety committee, which shall meet on a monthly basis to discuss issues specific to their building and update safety protocols. The school-based safety committees are responsible for organizing and conduct regular school safety drills and updating building level emergency plans on an annual basis, as needed.
- b. District-Level Safety Committee: At least one representative from each school-based safety committee shall be designated to be a member of the District-wide safety team, which shall meet on a monthly basis. The designated representative(s) serve as a liaison between the District and teachers/staff. In addition to representatives from the school-based safety committees, the District safety team shall also include the School Safety and Security Coordinator and a representative from the District’s Human Resources Office.
- c. Ad hoc Safety Committee: From time to time, the Superintendent may convene a task force to study school safety and security issues for the purpose of making recommendations to the Board.

**4. Routine Drills and Staff Training**

- a. Routine Drills: Preparing for emergencies involves yearlong practice through various drills. Drills are conducted as follows at all schools in the District:
  - **Building Evacuation:** This drill involves the systematic movement of students and staff from the school building to another area when conditions are safer outside than inside, such as a fire drill. During an evacuation drill, the school safety team

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assists with the evacuation. These drills take place on a monthly basis at each school in the District.

- **School Vehicle Evacuation:** As required by applicable law, two emergency evacuation drills on school vehicle will be conducted each school year. The first evacuation drill will be conducted during the first week of school, and the second evacuation drill will take place during the month of March. Each such drill shall include the practice and instruction concerning the location, use and operation of emergency exit doors and fire extinguishers and the proper evacuation of the vehicle in the event of fires or accidents.
  - **Lockout:** During a lockout drill, the exterior of the building is locked and secure. All outside school activities are safely returned into the building. Building occupants are informed of the situation and encouraged to raise their level of alertness and situational awareness. Ingress and egress of the school building becomes highly restricted. Interior school functions and operations may continue as scheduled. If high risk activity moves onto the school campus, the next step is lockdown. This drill takes place once per school year at each school in the District.
  - **Lockdown/Situational Awareness Drills:** During a lockdown drill, students, teachers, staff and visitors restrict their movements within classrooms, offices and workspaces, turn off lights, and shut and lock their doors. Such drills will also include opportunities to utilize situational awareness response strategies (also referred to as Run-Hide-Fight). These drills take place twice per school year at each school in the District; one of the drills specifically focuses on a scenario where an intruder (i.e. active shooter) has penetrated the building.
  - **Shelter-in-Place:** This drill involves immediately seeking shelter in a safe location within the building. This course of action may need to be taken during a severe thunderstorm, high winds, tornado, severe weather, or in the event of a hazardous material (HAZMAT) accidental release of toxic chemicals. This drill takes place once per school year at each school in the District.
- b. **Staff Training:** The District will provide all employees with mandatory training on school safety and security, as required by law. The training shall address the following topics:
- Situational awareness (also referred to as Run-Hide-Fight);
  - Trauma-informed education awareness;

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- Behavioral health awareness;
- Suicide and bullying awareness;
- Substance use awareness; and
- Emergency training drills, including fire, natural disaster, active shooter, hostage situation and bomb threat.

Training may be provided through online platforms as designated by the District.

Employees will be required to complete a minimum of three (3) hours of training every five (5) years. Employees required to undergo continuing professional education shall receive credit toward their continuing professional education requirements if the training program has been approved by the Department of Education in consultation with the statewide School Safety and Security Committee.

#### **5. Partnerships with Police, Fire, and EMS**

The Lower Merion Township Police Department, Fire Department, Emergency Management Service, and Montgomery County Office of School Emergency Planning are key safety partners of the District.

As required by applicable law, the District maintains and updates a Memorandum of Understanding (MOU) with the Lower Merion Township Police Department. Under this MOU, the District and the Lower Merion Police Department seek to foster a relationship of cooperation and mutual support in order to maintain a safe school environment. The MOU establishes procedures to be followed when certain incidents occur on school property, at any school sponsored activity, or in transit to or from a school or school sponsored activity.

### **B. PROTECTION SYSTEMS AND SECURITY**

#### **1. Photo Identification Badges**

District staff and designated contractors are required to display prominently photo identification badges whenever such personnel are on school premises. The Human Resources Department shall establish procedures for the issue of photo identification badges to all personnel commencing employment and designated contractors. Such procedures shall include controls for the surrender of identification badges by personnel terminating employment. The Human Resources Department shall also follow Board Policy 809 in regard to background checks and other rules for contractors/contracted services in relation to the issuing of photo identification badges.

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All employees, visitors, and contractors not escorted by district employees shall wear badges. School staff should challenge personnel without badges. Students should be instructed to report, to school staff, adults without badges.

School principals have the responsibility to recover employee badges at the end of each school year and reissue them to returning staff at the commencement of the following school year.

**2. Key Control**

Keys providing access to District facilities and equipment shall be issued only to District personnel designated by the Superintendent of Schools or designee, which shall include an inventory and tracking procedure that provides for strict accountability of all keys. See Appendix A.

The District shall utilize a non-reproducible, proprietary key system that prevents the duplication of keys by other than designated District personnel. Locks controlled by keys that have been lost or are otherwise unaccounted for, shall be rekeyed to prevent unauthorized use if the Director of Operations determines the missing keys pose a security risk.

District personnel are responsible for the security of the keys in their possession. District personnel are prohibited from allowing unauthorized personnel use of their issued keys. District personnel issued keys shall be responsible for immediately reporting lost or damaged keys. District personnel leaving employment shall surrender all keys upon termination of employment.

**3. Internal and External Locks/Electronic Door Access**

At the beginning of the student school day all exterior doors shall be locked. All visitors wishing to enter the school shall be directed to one or more controlled entrance(s) where access is granted only after school staff have determined the identity and purpose of each visitor in accordance with Section B.4., below. Such controlled access may be accomplished by the use of remote cameras and electronically controlled door locks. Many District buildings are protected by electronic door access controls. The video monitor and lock activation device controlling the designated controlled access entrance shall be located in each building's administrative area and shall be under the control of designated administrative personnel, campus aides, or security guards.

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Classrooms are to be locked, if possible, when not in use. When occupied by students, assigned staff must have classroom door key in their possession. Principals shall make every effort to have core facilities (library, computer labs, etc.) open during the student day.

Computer labs or other areas with a concentration of expensive equipment will be accorded a higher degree of security than other areas. Doors to computer labs shall be locked at all times when not in use. Unless a risk analysis indicates otherwise, computer labs should be protected with additional security such as motion detectors tied into the central alarm, card access requirements after hours, or some other means to provide additional security.

**4. Guest/Visitor Access to School District Buildings**

The District is committed to balancing providing a welcoming school climate and reducing the risk of unauthorized access to school facilities. Visitors and other personnel not directly employed by the District shall be issued temporary badges which shall be prominently displayed whenever on school premises. As part of the District’s guest/visitor management practice, each District building is equipped with Raptor software, which monitors all guests/visitors to the school facility and helps identify anyone who may compromise school safety. School principals shall institute measures for the control of temporary badges which shall include the date of issue and expiration date.

Through the use of Raptor, the District is able to:

- Maintain a record of all guests/visitors to the school facility;
- Identify any person who might attempt to access the school but who is restricted due to documented reasons, such as a custodial matter or court-ordered restriction; and
- Track all registered sexual offenders in the United States and alert staff when and if such a registered sex offender attempts to gain entry. In such cases where such registered sex offender has a legitimate educational purpose for visiting the school (for example, a parent of a child enrolled in the school), building administration will accommodate appropriate access to the building in a manner that balances the privacy interests of the family involved with the safety of students and staff.

After a visitor is cleared through the Raptor system, a badge with the date and time and the visitor’s name, photo, and destination will be printed. All visitors are required to wear their badge at all times. See Appendix B for additional procedures related to visitor access to school district buildings.



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**5. Cameras and Recording Systems**

All District buildings are equipped with internal and/or external video recording cameras for recording video images (but not audio). Video images obtained from recording devices are used as a means of enhancing the security of students, staff, other third parties, and District property, and for disciplinary purposes. Video recordings from cameras in or on District property may be viewed by authorized employees, authorized school officials, and, in certain circumstances, other third parties to the extent permitted by the Family Educational Rights and Privacy Act or other applicable law.

The Board has also authorized the use of video and audio recording on school vehicles for disciplinary and security purposes. The intention of video and audio recording on school vehicles is to provide a safe environment for students, school personnel and contracted personnel. Audio and video recordings from school vehicles may be viewed by authorized employees, authorized school officials, and, in certain circumstances, other third parties to the extent permitted by the Family Educational Rights and Privacy Act or other applicable law.

This Policy/Regulation does not apply to video recordings taken solely for the purpose of facilitating training and coaching of District student-athletes and coaching of District interscholastic and club teams.

See Appendix C for additional procedures related to use of cameras and recording systems on District property and in school vehicles.

**6. Security Personnel**

While all staff are expected to play a role in maintaining school safety and security as described herein, the Board may, as deemed necessary and appropriate, add personnel to increase and enhance building security measures. Such individuals shall be appropriately trained in order to perform duties assigned, to understand and adhere to District policies and procedures, and to support a welcoming school climate. Such personnel must also adhere to the requirements set forth in Policy/AR 809 (Contracted Services).

**7. Communication Devices**

Building principals, assistant principals, head custodians, campus security personnel, operations Department supervisors, and Cabinet members shall be equipped with

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communication devices that will enable them to enhance security and respond to emergencies.

**8. Building Maintenance and Repair**

The maintenance and repair of District buildings, grounds, equipment, and property is an important component of the District-wide safety program. The Director of Operations is responsible for the maintenance and repair of District buildings, grounds, equipment, and property.

Work orders for necessary repairs/maintenance that pose a safety or security risk shall be prioritized. Any unsafe condition, practice, material, equipment, tool, or machine shall be brought to the attention of the building principal and/or the Operations Department.

**C. PREVENTION AND MITIGATION MEASURES**

**1. Student Wellness Committee**

The District recognizes that student wellness is a critical component of the District-wide safety program. The District is committed to providing a school environment that promotes student wellness as part of the total learning experience. As required by law, the District has established a wellness committee, on which a broad array of internal and external stakeholders participate. More information regarding the District’s wellness committee and initiatives can be found in Board Policy/AR 254 (Student Wellness).

**2. District Threat Assessment Committee**

The District’s threat assessment committee is made up of representatives from each school to review and address a broad array of concerning student behavior by developing intervention plans to support students.

**3. School-Based Student Programming and Services**

a. School Counseling Services

School counseling services serve as a critical component of student support and are available in each school building. Such services are available to support students on a wide range of issues involving personal, social, and emotional development. School counseling services are also available to facilitate student discussion groups and individual

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or group student assessments. Students are encouraged to utilize counseling services as resources to support their wellbeing.

b. School Psychologists

School psychologists shall be available to provide mandated individualized assessments to determine students' strengths and learning needs, assist with determining appropriate interventions and consult with students, families and school personnel.

c. Mental Health Services

Counselors and other mental health service providers are available to conduct risk assessments, coordinate private services, facilitate student discussion groups and consult with student assistance and IEP teams.

d. School Social Workers

School and District-based social workers support all aspects of the student services support process. Among other roles, these key team members aid in identifying supports for students and families both in and outside of the school setting.

e. Student Assistance Referral Process (START)

This confidential referral process aids in identifying school supports to assist families in accessing community services for those struggling with drug or alcohol issues that pose a barrier to student learning and success at school or to overall student wellness.

f. Other Safety-Related Student Programming and Services

In order to take a proactive and holistic approach toward safety-related programming and services in District schools, the Superintendent and/or designee(s) shall regularly seek out and obtain or implement programming, resources, and/or services geared toward, among other topics:

- Managing mental health challenges, disorder and/or crisis;
- Talking with children about violence and/or tragic news;
- Recovering from trauma;
- Coping with disaster;

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- Managing stress, anxiety, depression, substance use, disruptive behavior disorders and eating disorders;
- Suicide prevention and awareness (see also Board Policy/AR 245 (Suicide Prevention and Self-Harming Behavior)) and,
- Recognizing social isolation and teaching students skills needed to connect with and include peers who may be experiencing social isolation.

#### **4. Role of Students in Promoting School Safety, Security and Climate Conducive to Learning**

The success of the District's safety initiatives depends in part on the continuing and sincere efforts of all members of the school community. Students who see anything out of the ordinary that raises a question or a concern regarding school safety and/or security should immediately contact school administration or law enforcement. Students may also report concerning behavior through Pennsylvania's Safe2Say system.

The District shall also encourage students promote school safety, security, and a climate conducive to learning. The below list is not intended to be an exhaustive list, but rather, examples of ways in which students can assist with furthering the goals of this Administrative Regulation and the accompanying Board Policy.

- **Listen to friends** – if they share intense feelings of anger, fear, anxiety, or depression, encourage them to seek help from parents/guardians or trusted adults, including school psychologists, counselors, teachers, faith community leaders or other professionals. If you are very concerned, seek help for them and/or share your concerns with your parent/guardian.
- **Understand the Student Code of Conduct** – model responsible behavior and refrain from teasing, bullying or intimidating peers.
- **Be a role model** – take personal responsibility for your anger by not physically or verbally harming others.
- **Help develop and participate in activities promoting student understanding of differences and respect for the rights of all.**
- **Participate in violence prevention programs**, such as peer mediation and conflict resolution. Employ these skills in other settings such as home, neighborhood, and community.

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- **Create, join or support student organizations which combat violence, teach tolerance and understanding and promote a positive self-image.**
- **Volunteer to mentor** younger students or tutor peers.
- **Assist local businesses and community groups** with organizing positive youth-oriented activities to help young people think of ways to combat violence and isolation.

**5. Fostering Relationships with Local/Regional Crisis Response Agencies**

The District’s administration will continue to seek and establish relationships with local and regional crisis response agencies in order to support students and families.

**D. RESPONSE AND RECOVERY**

**1. Procedures for Parents/Guardians to Follow During Emergency Situations**

The District recognizes the importance of timely and effective communication with parents/guardians during emergency situations. In the event of a school evacuation or early dismissal, parents/guardians will be informed by phone and email through the District’s School Messenger system as soon as possible. Information will be communicated about when and where (i.e. rally points) children may be picked up.

If there is an ongoing incident taking place, updates will be provided as new information is available. Information will be made available on the District’s website.

During an emergency, the first priority of school personnel is to address the emergency at hand. While some parents/guardians may wish to immediately come to school to pick up or aid their child, reporting too early may interfere with emergency responders and/or with the District’s actions related to moving and accounting for students and staff in a safe, efficient, and calm manner.

District staff and emergency responders will do everything possible to make the best decisions to assure everyone’s safety. Parent/guardian cooperation in allowing these professionals to do their jobs in an effective manner is appreciated.

Parents/guardians should ensure that the District has their most up-to-date contact information in order to ensure effective communication during an emergency situation. The

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District's ability to communicate is only as effective as the contact information the District has on file. Parents/guardians may update their telephone and email contact information through PowerSchool.

#### **2. Inclement Weather Procedures and Notification System**

The safety of staff and students is the District's top priority when making decisions as to whether to open or close schools in inclement weather. The decision to open or close schools is based on careful analysis of all relevant factors, including, but not limited to:

- Road conditions;
- Amount of snow and/or ice accumulated;
- Precipitation timeframe;
- Building conditions, such as whether they have electricity and heat;
- Parking lot conditions;
- Temperature and wind chill;
- Weather predictions; and
- What other local school districts are doing.

Decisions regarding the opening or closing of school are made as soon as possible in order to ensure sufficient time to communicate the news effectively to parents/guardians and the community.

Notifications will be communicated through:

- Radio and television (ABC 6, CBS 3, NBC 10);
- District website;
- School Messenger phone notification system;
- District email message;
- District-TV weather announcement (XFINITY 42 & FIOS 36);
- District Facebook page notification;
- District calendar posting; and
- Recorded notification message on school main phone number.

#### **3. Reporting Concerns or Suggestions Regarding School Safety or Security**

The success of the District's safety initiatives depends in part on the continuing and sincere efforts of all members of the school community. Any staff member or other third party who sees anything out of the ordinary that raises a question or a concern regarding school safety

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and/or security should immediately contact school administration or law enforcement. General non-emergency concerns or inquiries may also be sent to the following email address: [safety@lmsd.org](mailto:safety@lmsd.org).

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**APPENDIX A  
Key Control**

- 1) Request for keys shall be submitted to the Director of Operations who will determine if the request is consistent with Board policy. All keys shall be cut exclusively by the Operations Department’s mechanic upon approval of the Director of Operations.
  
- 2) “Master” keys will be issued to the following personnel:
  - Great Grand Master (will operate all door hardware in the district): Superintendent, Assistant Superintendent, Assistant to the Superintendent, Business Manager, Director of Operations, and Assistant Director of Operations, Supervisor of Safety Security & Custodians, Utility Foreman, Maintenance Foreman, Grounds Foreman, On-Call Operations Personnel, and Night Custodial Foreman.
  - Building Interior and Exterior Master: Building Principals, Assistant Principals, and Head Custodians.
  - Mechanical & Electrical Spaces: Operations Department maintenance mechanics and two per school to be issued by the principal.
  - Custodial Closets & Restrooms: Building Custodians
  - Network Closets & I.T. Spaces: Two I.T. Masters as authorized by the Director of Information Technology and individual space keys to I.T. personnel. Additional I.T. building master for each school to be controlled by the principal.

Note: The above procedures are applicable to those buildings currently using the Schlage Primus™ system. District buildings not yet converted to the Schlage Primus™ system will follow similar procedures using the Corbin or Sargent key systems.

- 3) Each school will be issued three (3) sets of individual interior door keys for the building, one key to be issued to the teacher, one key kept in the substitute envelope, and one inventoried in the building key box. Additional copies of keys are available on request to the Operations Department. The principal will be responsible for maintaining an accounting of the whereabouts of these keys. The Director of Operations will conduct a review of each school’s key control procedures at least once per year. Principals will collect all keys from staff at the



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end of the school year and forward a Key Inventory Report to the Director of Operations by July 1st each year. An explanation must be supplied for any missing keys before replacements will be made.

- 4) Additional individual keys will be issued for individual offices and administrative spaces in specific buildings, when appropriate, as requested by authorized approvers through the existing Work Order process which should include an explanation of why additional keys are needed. The following are authorized approvers:
  - School Buildings: Building Principals
  - Administration: Department Heads
  - Operations Areas & Playing Fields: Director of Operations
  - Information Technology Areas: Director of Information Technology
  - District Wide Approval: Superintendent
- 5) Personnel shall sign for keys upon issue. Principals and Department Heads are responsible for maintaining an inventory of keys issued to personnel in their chain of command. Lost keys shall be reported immediately to the Director of Operations or his designee. An explanation of the circumstances leading to the loss of keys will be provided. Personnel who have a documented history of handling keys in a careless manner may, at the District's discretion, be held financially responsible for lock changes required due to the loss of keys.
- 6) District personnel shall surrender all keys upon termination of employment or otherwise at the request of the employee's supervisor, the Director of Facilities or the Director's designee who will verify the keys turned in against the inventory list.

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#### APPENDIX B

#### Procedures for Access to School District Buildings (Visitors/Guests)

Raptor Security System is to be operated by LMSD employees/security personnel only. Under no circumstances is a parent, volunteer or student permitted to operate the Raptor Security System. When the visitor arrives, they will be greeted at the school building reception desk or counter and asked to submit a driver's license for scanning purposes. The visitor badge is to be worn by the visitor at all times while in the building.

#### General Procedures:

- 1) All designated personnel will receive training on visitor check-in procedures to ensure that all visitors have a visitor's badge or a LMSD photo ID card visible.
- 2) Any person who does not have a school visitor badge with the current date displayed or a LMSD ID badge will be immediately escorted to the office.
- 3) Signs will be placed at doors and potential entry points directing visitors to the front office to sign in. The sign will also indicate that all visitors will be required to submit identification into the Raptor Security System.
- 4) When the visitor arrives, they will be greeted and asked for a driver's license or an official state photo identification card.
- 5) The visitor's identification will then be scanned. If there is no alert indicated on the Raptor database, the visitor will be issued a badge with the visitor's destination included.
- 6) The driver's license or other photo identification will immediately be returned to the visitor when the badge is handed to them.
- 7) At no time will a visitor's identification card be kept by the attendant.
- 8) If the visitor does not have acceptable photo identification available, the school administrator on duty will be called to assess the situation and take appropriate action.
- 9) The visitor will return to the office to check-out when they are ready to leave the school.
- 10) The visitor will be instructed to give the badge back to the designated office personnel in order to check them out of the system.
- 11) Once the visitor has been signed out of the system, the badge will be torn thoroughly so that it cannot be reused.
- 12) If a visitor forgets to check out, the school will attempt phone contact through PowerSchool contact information.

#### Procedures for Returning Visitors:

Once the visitor's ID is scanned into the system, their information is secured in the Raptor database. Returning visitors do not need to have their IDs scanned again.

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- 1) School designated personnel will use the quick find feature for returning visitors by typing in the first few letters of the visitor's first or last name.
- 2) School designated personnel will compare the photo displayed for that name with the returning visitor.
- 3) If it is the same person, the visitor will be issued a badge with their destination.

#### Visitor Categories:

- *Parents/Guardians of Students at the School:*

All parents/guardians attempting to gain access to the school for the first time will present a valid driver's license from any state or an official state photo identification card for scanning purposes. Parents/guardians refusing to produce such ID may be asked to remain in the office or leave the school or facility as their identity cannot be verified. School administration may allow limited access based on their personal understanding of the situation or knowledge of the person in question. Such persons, however, should be manually entered into the system by the school administrator and have their names checked against the database.

Personnel conducting visitor check-in and scan processes will verify scan results and verify the nature of the visit. If the scan is negative and the visitor meets school or facility criteria, the visitor will be allowed appropriate access after receiving a visitor's badge.

The visitor will be requested to return to the office to check out when their visit is complete. They will then log out of the system. Each visitor will be asked to surrender the badge. The badge will be destroyed so that it cannot be reused.

- *Vendors/Contractors/Others:*

All vendors, contractors and other visitors not assigned to the particular school will be scanned into the system each time they want access to the school. Personnel conducting visitor check-in and scan processes will verify scan results and verify the nature of the visit. If the scan is negative and the visitor meets school or facility criteria, the visitor will be allowed appropriate access.

If the scan of the database comes back with a positive match, the vendor will be accompanied by a school employee or security guard while the delivery is made. The vendor will then be asked to provide contact information for their supervisor and asked to leave the school grounds. The administrator will then follow up with the supervisor and advise them that the particular vendor will not be allowed to make deliveries to that or any other school in the LMSD.

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#### Special Circumstances:

- *Parents/Legal Guardians Who Are Registered Sex Offenders*  
In the event an identified parent or legal guardian of a student is listed in the database, they will not be granted access to our school building except as provided below. If a parent or legal guardian is listed in the database and requests a teacher conference, the conference will be scheduled in a location designated by the building administrator.
  - School administrators will privately notify the parent/guardian that they appear to be matched with a person in the Raptor database.
  - If the individual indicates that there is a mistake, they will be encouraged to contact the state, listing their name, to rectify the matter.
  - The school administrator will send a letter regarding the parameters that the parent/guardian must follow. Administrators may add specific guidelines as appropriate with consultation with the Superintendent or designee.
  - The Law Enforcement representative for that school will be contacted to determine the status of this individual and if there are any conditions of their probation or parole that impact their access to the school.
  - The parent or guardian will not be permitted to interact with students or walk through the school unattended.
  - Failure to follow these procedures may result in parents/guardians being banned from the LMSD.

#### DISCLAIMER

The Raptor system accesses various state data bases for information on registered sex offenders. The Lower Merion School District does not have the ability to maintain, update, or change in any way the data in these databases. If the data in the state database is incorrect, the individual will be responsible for contacting the specific state agency and getting the data corrected. The Lower Merion School District will not be held liable or responsible for any errors, mistakes, or omissions in the state data bases. The Raptor System does NOT conduct law enforcement of criminal background checks. The Raptor System check does not replace a volunteer's required criminal history checks as indicated in School Board Policy and Administrative Regulation 908.

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**APPENDIX C**

**Video Recording Cameras for Safety and Security Purposes**

- 1) District buildings shall be equipped with video recording cameras for recording video images (but not audio) as a means of enhancing the security of students, staff, visitors, and school district property. District transportation, which includes but is not limited to school buses, may be equipped with video and audio recording devices which provide video and audio surveillance for safety and security purposes.
- 2) While the presence of audio and video recording devices on District property and in District transportation is intended as a deterrent to misconduct, such presence does not assure the elimination of misconduct and cannot guarantee the absolute safety of those on District property or riding in District transportation.
- 3) Written notices as to the presence and possible activation of any video or audio recording must be posted in locations where video or audio recording will take place.
- 4) Staff, students, and parents/guardians will be notified in writing as to the use of video and/or audio surveillance equipment on at least an annual basis.
- 5) The District prohibits any tampering with video and/or audio recording devices in District buildings and/or on District property, including buses or other District transportation. Disciplinary action and/or contact with law enforcement will occur in the event of such tampering.
- 6) Video images and audio obtained from recording devices are for use by District staff for investigating misconduct, safeguarding district equipment and assisting law enforcement.
- 7) Location of video recording devices:
  - a. The Director of Operations in consultation with the Superintendent or their designee, and as appropriate, the District legal counsel, shall determine the locations where cameras are placed including the parameters by which the video recording devices are programmed to pan, tilt, and zoom.
  - b. Some cameras are connected only to monitors and do not record video images.
  - c. Video and/or audio recording devices are provided in select locations but do not provide comprehensive coverage of all areas or all buildings.

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d. Video and/or audio recording devices shall not be used in any location where students or others have a reasonable expectation of privacy such as locker rooms or rest rooms.

e. Video and/or audio recording devices placed outside shall be positioned only where it is necessary to protect external assets or to provide for the personal safety of individuals on school grounds or premises, including buses. Devices shall not be used in a way where they record non-District property on more than an incidental basis, including in the course of doing the business of the District, such as a bus in transit.

g. Video and/or audio recording devices located internally shall not be directed to look through windows to areas outside the building unless necessary to protect external assets or to ensure personal safety of students, visitors, or employees, such as on a bus.

h. Video and/or audio recording devices on District transportation shall only be activated when that transportation is being used for school purposes.

g. The Director of Operations or their designee will approve the change of the location or angle of video and/or audio recording devices. On District transportation, recording devices may be mounted on the inside and/or exterior of the vehicle.

8) Only employees authorized in writing by the Superintendent or their designee may view the recordings.

- Video recordings from cameras in building and other fixed locations may be viewed in real time or may be viewed during the 14-day window for maintaining recordings on the District Video Recording Servers. Such employees shall sign a “Conditions of Use” form. **See Attachment C.1.**
- Video and/or audio recordings from cameras installed on buses may be viewed during the 7-day window for maintaining such recordings.

9) Active monitoring of video and/or audio recording devices is not feasible in all cases; therefore, other than secured entrances, or as approved by the Superintendent or their designee, images from such devices are typically only used to review incidents after they occur. With the exception of recordings from cameras installed on buses which are maintained for 7 days, video images from digital cameras will be stored on the District Video Recording Servers and overwritten at intervals no shorter than 14 days.

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10) Requests for viewing of video or, if applicable, listening to audio recordings, stored on the District Video Recording Servers for 14 days (or, in the instance of bus recordings, 7 days) will be limited to persons with a direct interest in any proceedings, disciplinary or otherwise, resulting from the recordings, as deemed appropriate by the building Principal or designee. The following rules shall be followed for viewing of and/or listening to video and/or audio recordings:

- a. Only the portion of the recording concerning a specific incident will be made available for viewing and/or listening with the exception of authorized personnel searching for images of a specific incident.
- b. Viewing of and/or listening to the recording shall occur on school property or as otherwise required by law.
- c. All viewing and/or listening will be in the presence of the building Principal or others as designated in writing by the Superintendent. Access will be limited to password protected identification in order to create a documentation, which may be electronic, as to who is accessing the video.
- d. Other than authorized staff identified within this Administrative Regulation, any parent/guardian, student or other interested party viewing video must sign an acknowledgement and agreement form relative to the confidentiality of the images/audio. [See Attachment C.4.]
- e. In the event that a District administrator considers it advisable for a parent or guardian to review a recording made on a school bus, the administrator must obtain permission of the Superintendent or the superintendent's designee prior to such review.

11) All video images and/or audio recordings, whether overwritten or archived as described below, shall be treated both in accordance with all laws regarding records and also with the District's established policies and administrative regulations and other procedures regarding records including student and employee records. See Board Policies 216 and 800.

12) Retention of video and/or audio recordings:

- a. Due to storage capacity limitations, digital video recordings will be erased normally on a bi-weekly basis by overwriting with new images on the storage media where the images are maintained. Therefore, video images stored on the District Video Recording Servers are written over at intervals no shorter than fourteen (14) days; for bus recordings, the

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storage capacity is limited to seven (7) days. Video recordings that contain personal information used to make a decision directly affecting an individual or individuals, however, may be retained, downloaded, and archived for a longer period as needed. This includes, but is not limited to, the following circumstances:

- i. A litigation hold has been instituted for the recording pursuant to other District policy or regulation.
  - ii. The recording is relevant to a pending student or staff disciplinary action.
  - iii. Law enforcement or other authorized federal, state or local agencies have requested the recording.
- b. In any of these cases, the Superintendent or other person specifically authorized in writing by the Superintendent must approve the archiving of such video recordings, and shall ensure that a video electronic release form is completed before disclosing video surveillance recordings to any party (see Attachment C.2.). Any such disclosure shall only be made in accordance with applicable legislation. Such release forms should include the individual or organization who is requesting the video recording, the date of the occurrence and when or if the video recording will be returned or destroyed by the authority or individual after use.
- i. District individuals possessing the authority to physically archive video images is strictly limited to: Supervisor of Safety and Security, Custodial Foreman, Director of Operations, Assistant Director of Operations, and Director of Information Systems.
  - ii. The Superintendent or other person specifically authorized in writing by the Superintendent may authorize an Information Systems Department technician to archive specific video images. Such authorization will be done in writing. An email message sent from the person in authority from their work email account is sufficient to meet this requirement.
- c. Any archived video and/or audio recording, whether stored on a server or other media such as DVD, shall be strictly controlled and accurate records regarding the archived video shall be kept. The records for archived video and/or audio recording shall include a written log with date of creation, dates and names of viewing by other individuals, dates of transmission to law enforcement, and date of destruction. See Attachment C.3.
- 13) Video images and/or audio recording which document misconduct may be used at parent/guardian conferences with District staff and, in the case of any misconduct involving



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criminal action, in accordance with each Memorandum of Understanding between the District and the local police departments. Video/audio recordings from District transportation of potentially criminal misconduct of third parties, including violations of Pennsylvania motor vehicles laws and regulations will be turned over to the applicable law enforcement agency. Recorded documentation of misconduct will be preserved at the direction of law enforcement.

- 14) In the event that a student is disciplined for misconduct and there is a video and/or audio recording from recording devices on District property that is used as evidence, the parent(s)/guardian(s) of the student may request permission in writing from the principal of the student's school to review the recording within two weeks of the imposition of discipline. A meeting will be arranged for the review with the school administration. Parents/guardians will only review the portion of the recording that documents the alleged misconduct of their child.
- 15) Video recorded documentation of misconduct will be preserved until disciplinary action or disposition is completed, including review by parent(s)/guardian(s), if requested. The Director of Operations or their designee will be notified to preserve such video/audio and will then follow the guidelines for video and/or audio record retention as described above.
- 16) In the event that video images and/or audio recordings in any way raise concerns in regard to child pornography, the District employee who viewed the video shall immediately report such concerns to the Superintendent or designee who shall then contact law enforcement.
- 17) Access to video/audio recordings retained more than 7/14 days:
  - a. All video/audio recordings not in use should be securely stored.
  - b. All video/audio recordings that have been used for the purpose of this policy shall be numbered and dated and retained according to the camera site.
  - c. The Superintendent or others authorized by the Superintendent must approve access to all video/audio recordings. Technology employees may not have access to video/audio recordings unless such access has been specifically granted as described herein.
  - d. Documentation shall be maintained of all episodes of access to or use of recorded materials as described above.

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ATTACHMENT C.1.

LOWER MERION SCHOOL DISTRICT

Viewing of Video Recordings in Real Time or on District Video Recording Servers
Conditions of Use for Authorized Employees
(Return to Operations Department)

Authorized Employee: \_\_\_\_\_
(Print first and last name)

Conditions of Use

Authorized employees are required to act in a responsible, ethical and legal manner, in accordance with Interim Guidance for the Use of Video Recording Cameras for Security Purposes, Federal and State law and all District policies prohibiting discrimination and harassment of others. Viewing of video recordings in real time shall be work-related. Specifically, the following uses are prohibited:

- 1. Sharing confidential information regarding students or employees without appropriate authorization from the Superintendent, Building Principal, or the authorized employee's direct supervisor.
2. Sending or displaying video recordings unless directed to do so by the Superintendent, Building Principal, or the employee's direct supervisor.
3. Harassing, insulting or attacking others as a result of video recordings viewed.
4. Engaging in practices that threaten the video recordings.
5. Improper use of the pan, tilt, zoom function on cameras to more closely view persons or activities that do not pose a security or disciplinary risk.
6. Use of video recordings to facilitate illegal activity.
7. Use of video recordings for political lobbying.
8. Use of video recordings for commercial purposes.
9. Use of video recordings to promote, support, or celebrate religion or religious institutions.
10. Intentional use of video recordings to send, receive, view or download visual depictions of obscenity, child or other pornography, or material harmful to minors.
11. Intentional use of video recordings in order to modify them.
12. Destruction, modification, or abuse of District video monitoring equipment.

Employee is authorized to view recorded video on District Video Recording Servers:
YES / NO \_\_\_ (Supervisor to circle one and initial)

Violation of the guidelines listed above and/or District network policies and regulations may result in suspension, or other disciplinary action and loss of the authorization to view video recordings in real time or on the District Video Recording Servers.

I have read the above information and will comply with its provisions.

Authorized Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor/Principal Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Approved: \_\_\_\_\_
Director of Operations

Date: \_\_\_\_\_

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ATTACHMENT C.2.

Release of Archived Video Recording

The archived video recording described below is released to the below named party by the Lower Merion School District.

- 1. Date of Creation of Archived Video file \_\_\_\_\_  
 Name of Person creating archived video recording \_\_\_\_\_  
 Control Number \_\_\_\_\_  
 Date Video Recording Made \_\_\_\_\_  
 Building/Name of Camera \_\_\_\_\_

- 2. **If archived video recording will be stored on portable media and physically transmitted Name of Person Receiving Video Recording:** \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Reason for Release \_\_\_\_\_  
 Signature of Person Receiving Video Recording \_\_\_\_\_

- 3. **If archived video recording will restored in restricted shared folder on a District server:**  
 Name of person requesting archived video \_\_\_\_\_  
 Organization (Building) \_\_\_\_\_  
 Shared Folder/location of archived video \_\_\_\_\_  
 Reason for release \_\_\_\_\_

- 4. Instructions for Destruction (circle one and initial)
  - a. \_\_\_\_ (initials) This recording must be returned to Lower Merion School District for destruction when no longer needed.
  - b. \_\_\_\_ (initials) This recording will be destroyed by the recipient and this form returned to LMSD indicating date and method of destruction.
  - c. \_\_\_\_ Recipient will notify the Supervisor of Safety, Security, and Custodians that the archived video may be deleted from restricted shared folder on District server.

Date destroyed: \_\_\_\_\_ Method of Destruction \_\_\_\_\_

- 5. Name of Person Authorized by LMSD to release video recording: \_\_\_\_\_  
 Signature \_\_\_\_\_  
 Date \_\_\_\_\_

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**ATTACHMENT C.3.  
LOG OF ARCHIVED VIDEOS STATUS AND DISPOSITION**

MB revisions	Control Number	Person Authorizing the Creation of Video Archive	Person Creating or Viewing Archived File	Reason for Creating or Viewing Archived File	Date Recording Made	Building/Name of Camera	Signature of Person Creating or Viewing Archived File	Date and Recipient of File if Transmitted from Archive Files NOTE: release to 3d Party outside LMSD requires use of Separate Release Form	Date of Destruction and Initials of Person Certifying Destruction	
									Hard Media	Files on server or client

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ATTACHMENT C.4.
VIDEO/AUDIO RECORDING ACKNOWLEDGMENT FORM

PARENT/GUARDIAN NAME: \_\_\_\_\_ (the "Parent")

STUDENT'S NAME: \_\_\_\_\_ (the "Student")

DESCRIPTION OF VIDEO RECORDING ("VIDEO RECORDING):

[Empty rectangular box for description of video recording]

As a condition for my being permitted to view and/or listen to the video recording, I acknowledge the following:

- 1. My child and/or I are a person with a direct interest in a proceeding, disciplinary or otherwise, resulting from the video recordings. It is in the sole discretion of the District as to what it considers a proceeding.
2. I am only entitled to view the portion of the recording concerning the specific incident(s) in which my child was involved.
3. The viewing of and/or listening to the recording shall occur on school property or as otherwise required by law.
4. All viewing and/or listening will be in the presence of the building Principal or senior building administrator, Assistant Principal, Activities Director, Director of Operations, Assistant Director of Operations, Supervisor of Safety, Security, and Custodians, and Custodial Foreman or others as designated in writing by the Superintendent.
5. A record will be kept of my viewing and/or listening to the recording.
6. I am obligated to maintain the confidentiality of any information pertaining to students other than my child. This shall not preclude me from making a good faith report to law enforcement based on information contained in the video recording.

PARENT/GUARDIAN SIGN HERE

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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*Office Use Only*

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The above-referenced video/audio recording was viewed and/or listened by the individual identified above on \_\_\_\_\_ at \_\_\_\_\_.

Administrator or designee (print): \_\_\_\_\_ Initial: \_\_\_\_\_

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