

# Video Surveillance Policy

## 1. Preamble:

As image bearers, we recognize that we are uniquely created with gifts and skills and we should treat one another with respect. This respect includes how we collect and manage personal information of others. The Personal Information Protection and Electronic Documents Act (“PIPEDA”) is a federal privacy legislation that also applies to the collection, use and disclosure of personal information by private sector organizations in Ontario in the course of commercial activities. The use of video surveillance by its nature has the potential to collect personal information. As such this policy applies to the personal information of students, staff and visitors of John Knox Christian School (“The School”). This policy should be read in conjunction with JKCS Privacy Policy.

## 2. Purpose:

The purpose of this policy is to outline the guidelines and procedures for the use of video surveillance within The School. This policy aims to ensure the safety and security of students, staff, and visitors while respecting the privacy rights of individuals, in accordance with the Guidelines for the Use of Video Surveillance published by the Information and Privacy Commissioner of Ontario, October 2015.

## 3. Scope:

This policy applies to all areas within the premises of The School, including indoor and outdoor spaces, where video surveillance may be utilized.

## 4. Principles:

- Video surveillance shall be used solely for the purpose of enhancing safety and security within The School premises.
- The collection, use, and disclosure of surveillance footage shall be conducted in compliance with applicable privacy laws and regulations.

- Access to surveillance footage shall be restricted to authorized personnel only, and shall not be used for purposes other than those outlined in this policy.
- The purposes of video surveillance are to:
  - Enhance the safety of students, staff, faculty and visitors;
  - Protect The School's property against theft, vandalism and other criminal activity;
  - Aid in the identification of intruders and other persons breaking the law.
- Information obtained through video surveillance will be used exclusively for security and law enforcement purposes, which must relate to the protection of students, staff and visitors, or the deterrence or detection of criminal activity, including theft, vandalism or other property damage.

#### 5. Placement of Cameras:

- Cameras shall be strategically placed in areas where there is a legitimate need for surveillance, such as entrances, hallways, parking lots, and other high-traffic areas.
- Cameras shall not be installed in areas where individuals have a reasonable expectation of privacy, such as washrooms and changing rooms, unless under exceptional circumstances with appropriate authorization.
- If cameras are adjustable by operators, this practice will be restricted, whenever possible, so that operators cannot adjust or manipulate the cameras to view spaces that are not intended to be covered by the video surveillance program.

#### 6. Notification:

- Visible signs shall be posted at all entrances and other prominent locations on the school premises to inform individuals that video surveillance is in operation.
- The signs shall include information on the purpose of surveillance and contact details for inquiries regarding the use of surveillance footage.

#### 7. Access and Retention:

- Access to surveillance footage shall be limited to authorized personnel, such as the school principal, specified administrative staff, and designated security personnel. The footage will only be used when less intrusive means of deterrence have been shown to be ineffective or unworkable.

- Where a review of record information indicates that unlawful activity has occurred or is suspected, law enforcement agencies will be brought in to review the recorded information.
- When a recording has been seized as evidence, the name of the investigating officer and the date and time of the seizure will be recorded and retained in a log.
- Surveillance footage shall be retained for a limited period of 30 days as necessary for the purposes of investigation, security, or compliance with legal obligations. After the retention period, footage shall be securely deleted or anonymized, unless required for legal proceedings or other legitimate purposes.
- Copies that are made of specific segments or segments that are identified as of interest for purposes of criminal investigation, will be dated and labeled with a unique, sequential number or other verifiable symbol, and access to these will be limited to authorized personnel. Logs will be kept of all instances of access to, and use of these stored segments and copies, to provide for a proper audit trail. These stored copies may be retained for a period of one year. The length of this retention period may be reduced by way of formal resolution by The School or the courts.

#### 8. Data Security:

- Measures shall be implemented to ensure the security and integrity of surveillance footage, including encryption, password protection, and restricted access to storage devices.
- Any transfer of surveillance footage outside the school premises shall be conducted securely, with appropriate safeguards to prevent unauthorized access or disclosure.

#### 9. Accountability and Oversight:

- The school principal shall be responsible for overseeing the implementation of this policy and ensuring compliance with privacy laws and regulations.
- Regular audits and reviews shall be conducted to assess the effectiveness of the video surveillance system and compliance with this policy. Any identified issues or concerns shall be promptly addressed.\

#### 10. Training and Awareness:

- All staff members with access to the video recordings, shall receive training on the proper use of video surveillance, including their responsibilities for safeguarding privacy and maintaining the security of surveillance footage.
- Students and parents/guardians shall be informed about the school's video surveillance policy through school newsletters, websites, or other communication channels.

#### 11. Compliance:

- Any concerns or complaints regarding the use of video surveillance within the school premises shall be addressed in accordance with the school's whistleblower policy and applicable privacy laws.

#### 12. Review and Revision:

- This policy shall be reviewed every five years to ensure its effectiveness and compliance with evolving legal and regulatory requirements. Any revisions shall be approved by the school administration and communicated to relevant stakeholders.
- Any deviation from this policy will only occur with the explicit approval of The Board and The Principal.

#### 13. Contact Information:

For inquiries or concerns regarding the use of video surveillance at The School, please contact The School Chief Privacy Officer at 905.829.8048.