



POLICY NUMBER AND NAME: 07.04 VIDEO SURVEILLANCE POLICY	SECTION: 07 - FACILITIES
	VERSION: VERSION 1.0
	LAST REVISION DATE:
ADOPTED: FEBRUARY 24, 2025	REVIEW FREQUENCY: ANNUALLY (BY RCS PRIVACY OFFICER)

PURPOSE

The purpose of this policy is to set out the rationale, guidelines, and limitations for the use of video surveillance in Richmond Christian School (RCS). Its basic tenets are drawn from the Office of the Privacy Commissioner of Canada's *Guidelines for Overt Video Surveillance in the Private Sector*.

REVIEW HISTORY		
DATE	VERSION	CHANGES



1. RATIONALE

RCS is committed to maintaining a safe and secure environment for all students, staff, families, visitors, and others on its premises. Video surveillance is a key tool in achieving this goal. The purpose of video surveillance at RCS is to monitor high-risk areas for incidents such as (but not limited to) vandalism, theft, property damage, assaults (verbal or physical), threats, or violence. The presence of video surveillance supports RCS' efforts to:

- a. discourage such incidents from occurring
- b. review security footage for investigative purposes
- c. provide security footage to law enforcement for investigative purposes;
- d. collect, use, or disclose security footage as otherwise permitted by law.

This policy seeks to balance RCS's commitment to safety and security with individuals' privacy rights.

2. GUIDELINES FOR USE:

- a. RCS will assess whether video surveillance is necessary to achieve its objectives and if the concerns are serious enough to justify its implementation. Less intrusive alternatives, such as improved lock systems (or other theft prevention controls), removal of visual barriers, enhanced night-time lighting, increased supervision, or on-site security, will be considered first. Video surveillance will only be used as a last resort after exploring and exhausting all less intrusive options.
- b. The RCS Superintendent and Privacy Officer must authorize the implementation of any video surveillance system.
- c. RCS will install and prominently display clearly written signs in areas under surveillance, that includes:
 - i. Notice of video recording
 - ii. Purpose of surveillance
 - iii. Times of use
 - iv. Contact information of the Privacy Officer for inquiries
- d. RCS will limit whenever possible the camera view coverage to only collect the personal information necessary for ensuring safety and security. Cameras will not be used to capture

video of public streets or neighboring private properties, nor will they operate 24/7, unless required.

- e. RCS will store recorded images in a secure location with limited access and will destroy them once they are no longer needed for safety, security, or legal purposes. Procedures for retention and destruction of video surveillance footage will be developed by RCS in accordance with the specific equipment implemented in reference to the Personal Information and Privacy Act.
- f. RCS will evaluate requests for access to video footage in consultation with the RCS Privacy Officer and, if necessary, legal counsel. Requests must be submitted in writing to the RCS Privacy Officer.
- g. The RCS Privacy Officer will review annually the need for video surveillance and make recommendations to RCS.
- h. RCS will ensure that all video surveillance equipment operators are familiar with this Policy and privacy laws. It will be a requirement for all operators to review the Policy and privacy laws and receive necessary training to properly understand and fulfill their responsibilities.
- i. The RCS Privacy Officer must be immediately notified of any unauthorized disclosure of images or video and will consult with legal counsel if required.
- j. The RCS Privacy Officer will ensure that all necessary details are finalized and included in this Policy and will review it annually to determine if amendments are needed, presenting recommendations to RCS.
- k. This Policy will be made available to anyone who requests it.

3. SCOPE OF USE

- a. Video Surveillance will not in any circumstances be used in areas where people have a high expectation of privacy, including but not limited:
 - i. Bathrooms and changerooms
 - ii. Private offices
 - iii. Classrooms during regular hours
- b. RCS will collect, use, and disclose personal information obtained from video surveillance solely for the specific purpose it was collected for, or as permitted by law.
- c. RCS will set up video surveillance systems to collect the minimum amount of information to achieve its objectives.
- d. RCS will evaluate the necessity of video surveillance annually, including for each location, and to ensure this Policy remains current.



4. ACCESS, USE, AND SECURITY

- a. Only authorized personnel, as designated by the RCS Privacy Office, may access the surveillance system and recordings.
- b. All surveillance equipment and recordings will be stored in a secure, controlled access area.
- c. Recordings will be password protected and encrypted.
- d. Recordings may only be viewed when there is a reported incident or apparent damage to school property.
- e. Viewing should be done in private by authorized personnel only.
- f. Recordings will not be used for routine staff performance evaluations.
- g. Recordings will be kept no longer than 90 days, unless required for an ongoing investigation or legal proceedings.
- h. Recordings will be securely disposed of to ensure personal information is permanently erased and cannot be recovered.