

Policy Statement



Policy No. E-10

SUBJECT: Resources

Approval Date: June 28, 2016

Resolution No: C-15/16-166

Revision Date: June 25, 2025

Resolution No: C-24/25-188

Origin: Governance and Ethics Committee

OBJECTIVES

This policy is meant to establish clear guidelines for the installation and use of camera surveillance systems by the Western Quebec School Board and its schools/centres.

REFERENCES

- Act Respecting Access to Documents Held by Public Bodies and the Protection of Personal Information (hereinafter described as “the Act”)
- Civil Code of Quebec (Sections 35 and 36)
- Quebec Charter of Human Rights and Freedoms (Sections 5 and 46)
- Guidelines from the Commission d'accès à l'information du Québec
- Police services training and advice

PREAMBLE

The use of surveillance cameras in public places, as well as the collection and use of confidential information, are already well regulated by laws and regulations referenced in this policy.

This policy is developed to define the roles and responsibilities of each party and the acceptable reasons for using surveillance cameras in the establishments of the Western Quebec School Board.

GENERAL

The Western Québec School Board, its schools and centres strive to maintain safe and secure learning environments for students, staff, and community members involved in school life.

It is possible that the addition of a surveillance camera system may demonstrate to be an essential complement to the other strategies put in place to:

Enhance Safety and Security

- Protection of Students and Staff:
 - Surveillance cameras can help protect students, staff, and visitors by recording evidence that can be used to resolve investigations
- Prevention of Violence and Bullying:
 - Cameras can act as a deterrent to bullying and violence, providing a safer environment for students to learn and interact.

Protect School Property

- Deterrence of Vandalism and Theft:
 - Surveillance camera can help prevent vandalism and theft of school property, reducing costs associated with repairs and replacements.
- Monitoring Unauthorized Access:
 - Cameras can help identify and prevent unauthorized individuals from entering school grounds, enhancing overall security.

Supporting Incident Investigations

- Evidence Collection:
 - In the event of an incident, surveillance footage can provide valuable evidence to support investigations and resolve disputes.

Enhance Emergency Response

- Quick Response to Emergencies:
 - Surveillance systems can aid in the rapid identification and response to emergencies, such as fires, medical incidents, or security breaches.
- Coordination with Authorities:
 - Footage from surveillance cameras can assist law enforcement and emergency responders in managing and resolving critical situations effectively.

The Western Quebec School Board, its schools and centres are committed to transparency. For this reason, the participation of the governing board is crucial in the process of developing a project for the use of cameras and for the revision of the necessity to keep this solution.

Surveillance camera systems collect personal information about identifiable individuals. The school board has the authority to collect this information according to 'the Act'. No one can collect personal information for the board unless it is:

- Specifically allowed by this policy;
- Used for law enforcement purposes;
- Necessary for managing school board facilities or activities.

The Western Quebec School Board will not use camera surveillance system for monitoring staff performance.

This policy is not intended to deal with or apply to:

- a) Instances where staff records a specific event such as a school fair or graduation ceremony;
- b) Instances where a classroom is recorded for educational or research purposes, for example, where a student teacher is required to record his or her lesson as part of an assignment for a work placement.

IMPLEMENTATION OF A VIDEO SURVEILLANCE SYSTEM

In designing, installing, and operating a camera surveillance system, the school board, as part of its general overall responsibility for camera surveillance systems, will consider the following:

- Camera surveillance equipment such as video cameras, audio equipment, or other devices should only be installed in identified public areas where camera surveillance is a necessary and viable detection or deterrence activity;
- The equipment should be installed in such a way that it only monitors those public spaces that have been identified as requiring video surveillance. Cameras should not be directed to look through the windows of adjacent buildings or, as much as possible, onto adjacent property;

- If cameras are adjustable by operators, this should be restricted, if possible, so that operators cannot adjust or manipulate them to include spaces that are not intended to be covered by the video surveillance program;
- Equipment shall never monitor the inside of areas where the students, staff, and the public have a higher expectation of privacy including but not limited to change rooms and washrooms;
- Clearly written signs prominently displayed at the entrances, exterior walls, and the interior of buildings in which a video surveillance system has been installed, shall provide students, staff, and the public a reasonable and adequate warning that video surveillance is in effect. Signage shall inform individuals of the title, business address and telephone number of someone who can answer questions about the system. As a minimum there must be multiple signs in place that notify individuals of the recording and inform them that they may contact the school office with any questions (Addendum "C"). Principals and centre directors will be the contact person for schools and centres;
- The reception equipment shall be in a strictly controlled access area. Video monitors shall not be placed in a position that enables public viewing. Only the personnel authorized in writing by the principal/centre director shall be permitted access to such controlled access area and the recording equipment.
- The persons operating the devices shall be made aware of the required procedures to protect privacy as outlined by "the Act".

ACCESS, USE, DISCLOSURE, RETENTION, SECURITY, AND DISPOSAL OF RECORDS

Any information obtained through the use of video security surveillance systems may be used only for the purposes set out in this policy and for the goals noted below.

Since video security surveillance systems may record nominative information, each school/centre having such a system must implement the following procedures:

- a) Video surveillance systems shall not be used for monitoring staff performance;
- b) Storage devices that are not in use must be stored securely in a locked receptacle located in a controlled access area. Each storage device that has been used should be dated and labelled;
- c) In each school/centre only the principal/centre director, the school computer technician and if needed, a senior administrator at the school board level, may review the recordings and only for the purposes outlined in this policy;
- d) Only authorized personnel shall have access to the storage device. There must always be two authorized individuals, working together, in all instances of access to, and use of recorded material. This access must be recorded in the Access To and Viewing of Recorded Material Log (Addendum "A");

- e) Circumstances that would warrant review will normally be limited to an incident that has been reported /observed or to investigate a potential crime;
- f) Real-time viewing of monitors may be delegated by the principal/centre director to a very limited number of individuals and for a very specific purpose;
- g) The retention period for recorded information, whether or not it has been viewed, shall be a maximum of twenty-eight (28) calendar days. This timeframe is based on experience, risk assessment, privacy considerations, and equipment capabilities. Recorded information is then to be routinely erased by a WQSB designated employee in a manner in which it cannot be reconstructed or retrieved and that there be a log kept indicating the date and the name and signature of the designated person assigned to erase the recordings;
- h) Notwithstanding section (f) above, the board will store and retain, beyond the above mentioned 28 days, the recorded information necessary for evidentiary purposes according to standard procedures until law enforcement authorities require them. In these cases, the Secretary General will be responsible for the storage and release. The Recorded Information Release Form (Addendum B) is to be used in these special cases;
- i) Old storage devices must be securely disposed of in such a way that the nominative information cannot be reconstructed or retrieved. Disposal methods could include shredding, burning, or magnetically erasing the nominative information;
- j) Any student, staff member, or member of the public who has been recorded by a video surveillance system has a right of access to his or her personal information according to the terms of “the Act”.

RESPONSIBILITIES

		Legend: A: Accountable I: Inform C: Consult						
		Secretary General	Senior Director	Director of IT	Director of Finance	Director of Buildings	Principal and centre Director	Governing Board
New Project Request								
Explanation of the need: Preparing a report concerning risks and dangers presented by a situation regarding public order and the security of persons, places and/or property. (The report shall also include the designation of the places targeted for video surveillance and their relation to the risk and real dangers identified in the report)		I		C			A	
Preapproval of the project feasibility: Reviewing and approving any plan presented by the principal or centre director. The validation must include the Financial and Technical feasibility and the validation of the conformity with laws and regulations.		A	C	C	C	C		

Consultation with the Governing Board: Presentation and consultation of the project with the governing board						A	C
Project Approval: Approving by resolution the project	I		I	I	I	C	A
Review the resolutions: Reviewing the governing board resolutions approving the use of a camera surveillance system	A					I	I
Revision of the Need							
Validation of the need: Reviewing the necessity of maintaining a camera surveillance system in place taking into consideration the following factors <ul style="list-style-type: none"> ▪ Whether the initial grounds still exist; ▪ Whether the expected results have been achieved; ▪ Whether the conditions of use are adequate and adapted to the situation; ▪ Whether the type of cameras used and their number are appropriate; ▪ Whether more appropriate alternatives compatible with existing rights to privacy can be envisioned 	C	C	C		C	C	A
Modification of the original project: If a revision of the initial project is required, proceed with a new project request						A	I
Purchase, Installation and Maintenance							
Purchasing: Proceed with the purchasing of the equipment			A			C	
Installation: Insure proper installation and physical protection of the equipment			A		C	I	
Configuration: Insure proper configuration of the equipment and proper logical security	C		A			I	
Tendering: Maintain the availability of cameras by managing the procurement process for cameras using the appropriate tender strategy.			A			I	
Maintain the replacement plan and proceed with replacement at the end of life of the equipment			A	C	C	C	
Signalization: Install signs that notify individuals of the recording	I		A		C	I	I
Ensuring security of information							
Usage: Ensuring the proper use of a video surveillance system in accordance with school board policy	C		C			A	C
Confidentiality: Maintaining the confidentiality and security of the information	C		C			A	
Access: Ensuring that access to the information is restricted to the principal and an individual designated, in writing, by the principal/centre director and keep confidential the Addendum A form for a period of at least 7 years	C		C			A	
Control							
Advice: Providing advice related to the School Board's obligations under this Policy;	A		C			I	
Access: Overseeing the verification of the use of video surveillance systems.	A		C			I	
Training: Insuring all school board staff who are responsible for the monitoring of video surveillance systems have the appropriate training required and know the expectations outlined in this policy	A		C			C	
Retention Period							
Respect of the retention period	A		C			C	

RECORDED INFORMATION RELEASE FORM

Date	
School/Centre	
Principal/Director	
Device Number	
Date of Recording	
Information Released to	
Reason for Information Release	
Expected Date of Return	
Information Disposal Method	
Information Disposal Date	
Name and Signature of Individual Receiving Information	

AVIS

Ce secteur est sous vidéosurveillance 24/24h.



NOTICE

This area is under 24 hour video surveillance.

La Commission scolaire Western Québec a installé un système de vidéosurveillance dans ce bâtiment.

Le système est utilisé pour assurer la sécurité des étudiants et du personnel, pour assurer la sécurité des locaux et, en cas d'incident, pour aider à l'enquête sur cet incident.

Pour plus d'informations sur le système et son utilisation, vous pouvez contacter le directeur de l'école ou le directeur du centre.

The Western Québec School Board has installed a Video Surveillance System in this building.

The system is used to secure the safety of students and staff, to ensure the security of the premises, and in the event of an incident, to aid in the investigation of that incident.

For further information about the system and its use you may contact the Principal of the School or Director of the Centre.