



NIPISSING-PARRY SOUND STUDENT TRANSPORTATION SERVICES

PROCEDURES FOR THE USE OF VIDEO CAMERAS

Definitions	<p>a) “Personal Information” Personal information is defined as being recorded information about an identifiable individual, which includes, but is not limited to, information relating to an individual's race, colour, national or ethnic origin, sex and age. When a video surveillance system displays these characteristics of an identifiable individual or the activities in which they are engaged, its content will be considered “personal information” as defined under the <i>Municipal Freedom of Information and Protection of Privacy Act</i>.</p> <p>b) “Record” Record is defined to mean any information, however recorded, whether in printed form, on film, by electronic means or otherwise, and includes: a photograph, a film, a microfilm, a videotape, a machine readable record and any record that can be produced from machine readable record.</p> <p>c) “Video Surveillance System” Video Surveillance System refers to a video, physical or other mechanical, electronic or digital surveillance system or device that enables continuous or periodic video recording, observing or monitoring of individuals. This includes video, audio, and thermal imaging technology, or any other component associated with capturing the image of an individual.</p> <p>d) “Storage Device” Storage Device refers to a videotape, computer disk or drive, CD-ROM, computer chip or other device used to store the recorded data or visual, audio or other images captured by a video surveillance system.</p> <p>e) “Principal” The Principal refers to the Principal or head teacher of a school operated by one of the four (4) member school boards of the NPSSTS.</p> <p>f) “Operator” The Operator refers to the current primary operations manager or owner (or designate) of the transportation company.</p> <p>g) “Acts” Acts in this document refer to the <i>Freedom of Information and Protection of Privacy Act</i> (hereafter the Provincial Act) and to the <i>Municipal Freedom of Information and Protection of Privacy Act</i> (hereafter the Municipal Act).</p>
Responsibilities	<p>The General Manager is responsible for the NPSSTS's overall Video Surveillance System.</p>



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	<p>The Operations Manager or designate is responsible for the day to day operation of the system in accordance with the policies of the member school boards, the procedures put in place by the NPSSTS, and any other direction that may be issued from time to time. The Operations Manager or designate is responsible for supervising school bus operators in the correct and lawful use of video surveillance systems. School Bus Operators are responsible for the proper and legal operation and maintenance of video surveillance equipment as authorized and directed by the NPSSTS. Each school bus operator is responsible for the privacy of the students that ride its buses and for keeping a log of the route number, date, and time when cameras are recording.</p>
<p>Notice to parents/ guardians and students</p>	<p>a) A clearly written sign must be prominently displayed at the perimeter of the video surveillance equipment location so that each person has reasonable and adequate warning that surveillance is, or may be, in operation.</p> <p>b) The NPSSTS will inform parents and guardians that video surveillance equipment is, or may be, used on school buses by means of a pamphlet that must be issued at least once per year and that must include details on the legal authority to collect the personal information, the principal purpose(s) for which the personal information is intended, and the title, business address and telephone number of a person that can answer questions about the collection of information from a video surveillance system. The pamphlet will be prepared by the NPSSTS and provided to each school for distribution at the beginning of each school year. Subsequently, parents of new pupils will also receive a copy of the pamphlet throughout the school year as they register.</p>
<p>Collection of Personal Information Using a Video Surveillance System</p>	<p>Any recorded data or visual, audio or other images of an identifiable individual qualify as “personal information” under the Acts. Video surveillance systems can be operated to collect personal information about identifiable individuals. The NPSSTS and its member school boards have determined that they have the authority to collect this personal information in accordance with the Acts. No person shall collect personal information on behalf of the NPSSTS unless that collection is expressly authorized.</p>
<p>Operation of Cameras for Intended Purposes Only</p>	<p>A Video Surveillance System is to be used only for the intended purposes as set out in these procedures. Any use of a Video Surveillance System must relate to the protection of pupils and staff on school buses including monitoring the disciplinary strategies or consequences that arise from incidents of student misconduct, or it must assist in the detection and deterrence of criminal activity and vandalism.</p>
<p>Access, Use, Disclosure,</p>	<p>Information should not be retained or used for purposes other than those described in these procedures. Consequently, access to records must be limited to those authorized officials of the NPSSTS and its member school boards who require access to records in order to</p>



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<p>Retention and Disposal of Video Surveillance Records</p>	<p>maintain order on school buses.</p> <p>a) Only the General Manager or designate or the Principal or an authorized individual (designated in writing by name and by position by the General Manager or by the Principal) may review information from the records.</p> <p>b) Access to hard drives from school bus video cameras is to be controlled by the General Manager or designate. Each bus operator will designate one person who will have a key to extract the hard drive. That designated person must be approved by the General Manager. The hard drive can only be delivered to the Transportation Officer or designate. The General Manager or designate will be the only individual with access to the reading software.</p> <p>c) All tapes or storage devices, other than the hard drives in the video cameras on school buses, will be stored securely in a locked receptacle located in a controlled access area. Each storage device that has been used will be dated and labelled with a unique sequential number or other variable symbol. A log of these labels will link the specific storage device with the route number(s), date(s), and time(s) of the recording contained therein.</p> <p>d) Access to storage devices will be limited to authorized personnel: the General Manager, the Transportation Officer, the Principal, or a duly authorized designate. A "Video Surveillance Instance of Access Form" (SS-011-1) will be kept so as to provide for a proper audit trail.</p> <p>e) The retention period for information that has not been viewed for school or public safety or law enforcement purposes shall not exceed 60 days. These time frames are based on experience, risk assessment, privacy considerations, and equipment capabilities. Recorded information that has not been used in this fashion within this time frame is then to be routinely deleted in a manner in which it cannot be reconstructed or retrieved.</p> <p>f) When recorded information has been viewed for law enforcement, school bus safety, or public safety purposes, section 5 of Ontario Regulation 823 under the Municipal Act and section 5(1) of Ontario Regulation 460 under the Provincial Act requires that personal information must be retained for one year. For the purposes of the NPSSTS, this retention will be for one year from the time of resolution of the incident in question.</p> <p>g) The NPSSTS will store and retain those storage devices containing recorded video tapes and CDs that are required for evidentiary purposes according to standard procedures until law enforcement authorities request them. These tapes and CDs are to be stored in a secure location. The appropriate Release of Video Data section of the "Video Surveillance Instance of Access Form" (SS-011-1) must be</p>
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	<p>completed before any storage device is disclosed to appropriate school principals and authorities. The form will indicate who took the device, under what authority, when the disclosure occurred, and whether or not it will be returned or destroyed after use. This activity will be subject to audit.</p> <p>h) Old storage devices must be securely disposed of in such a way that the personal information cannot be reconstructed or retrieved. Disposal methods could include shredding, burning, or magnetically deleting the personal information. The Destruction of Video Data Log section of the "Video Surveillance Instance of Access Form" (SS-011-1) is to be completed. The Destruction of Video Data Log will state the date and method of disposal as well as the name and position of the person responsible for disposing of the records.</p>
<p>Access to Personal Information</p>	<p>Any student, school bus driver, monitor or other staff person or member of the public that has been recorded by a video surveillance camera has a general right to access under section 36 of the Municipal Act and section 47 of the Provincial Act. Access may be granted to one's own personal information unless an exemption applies under section 38 of the Municipal and section 49 of the Provincial Act. One exception that may apply is contained in subsection 38 (b) of the Municipal Act which grants the heads of institutions discretionary power to refuse access where disclosure would constitute an unjustified invasion of another's privacy. Access to an individual's own information in these circumstances may depend upon whether any exempt information can be reasonably severed from the record.</p> <p>Any student, school bus driver, monitor or other staff person or member of the public that has been recorded by a video surveillance camera may receive a written summary of the record, subsequent to a written request for said summary.</p>
<p>Audit and Evaluation</p>	<p>The NPSSTS should regularly review and evaluate all of its video security surveillance systems on school buses in order to ascertain whether or not they are still justified and whether or not the policies and procedures with respect to the use of video surveillance systems are being followed.</p> <p>The NPSSTS may be subject to an audit. Any deficiencies or concerns identified by an audit team must be addressed as soon as possible.</p>