

Date of Meeting: 2025 April 08

Agenda Item #: 5.c

REPORT TO:	Policy Working Committee
	Public or In-Camera (for Board Meetings only): N/A
TITLE OF REPORT:	 TVDSB Policy and Procedure Revisions: 2017 Security Cameras and Digital Imagery Policy (Formerly Video Surveillance Policy) 2017a Security Cameras and Digital Imagery Procedure (Formerly
	Video Surveillance Procedure)
PRESENTERS: (list ONLY those attending the meeting)	Carolyn Glaser, General Manager Information Technology Services Jim Bobier, Project Manager Information Technology Services
REPORT AUTHORS:	Carolyn Glaser, General Manager Information Technology Services Jim Bobier, Project Manager Information Technology Services
PRESENTED FOR:	Input/Advice
Recommendations: (only required when presented for approval)	As determined by Policy Working Committee.
Purpose: (include context)	Policy Working Committee to provide input to the updates recommended for the 2017 Security Cameras and Digital Imagery Policy (Formerly Video Surveillance Policy). Policy 2017 and Procedure 2017a was last updated in 2016. Since this time, technology and the board's use of security cameras has changed, necessitating updates to these documents to reflect the current technological landscape and board practices. The updates to Policy 2017 and Procedure 2017a aim to enhance the security and
	responsible use of security cameras and digital imagery within Thames Valley District School Board (TVDSB).
Content:	Summary of updates to Policy 2017 and Procedure 2017a are detailed as follows:
	 Policy 2017 Security Cameras and Digital Imagery The policy emphasizes the importance of security cameras and digital imagery in supporting a safe, secure and private environment for students, staff and visitors. The policy addresses the installation, placement, notification, access, use, retention and disposal of video recordings in accordance with the Privacy and Management of Personal Information Procedure, the Privacy Breach Protocol Procedure and the Municipal Freedom of Information and Privacy Act.

 The Information Technology Services (ITS) Department is responsible for monitoring and reviewing the policy to ensure alignment with legislative changes, information technology practices, and Ministry of Education directives.

Procedure 2017a Security Cameras and Digital Imagery

- The procedure aims to deter and prevent acts of vandalism, theft, and other criminal activities by providing a visible and effective monitoring system.
- The procedure supports transparency in the use of security video systems and ensures accountability in their operation and management. It also ensures that security video systems operate in accordance with relevant privacy laws and regulations, collecting only the data necessary to achieve the intended goals.
- The procedure manages the collection, retention, use, and disclosure of security camera data in a lawful and ethical manner, ensuring the protection of personal information.
- The ITS Department is responsible for monitoring and reviewing the procedure to ensure alignment with legislative changes, information technology practices, and Ministry of Education directives.

The updates to Policy 2017 and Procedure 2017a aim to enhance the security and responsible use of security cameras and digital imagery within TVDSB. These changes ensure that the policy and procedure are aligned with current legislative requirements, board practices and the educational goals of TVDSB.

The drafts for both documents have been distributed to departments, programs areas and labour groups. The feedback received was thoroughly reviewed, and where appropriate, it has been incorporated into the draft policy and procedure.

The revisions to Policy 2017 and Procedure 2017a were presented to the Equity and Inclusive Education Committee on March 19, 2024. Comments received from the Committee are included and have been addressed as noted below. Please note, since the EIE review and feedback report, section numbers have been updated in both the policy (Appendix C) and procedure (Appendix E) to increase the readability for all reviewers. The updated sections numbers are reflected below in brackets.

Regarding s. 2.3 of the Policy and Procedure, The Committee
questioned who would constitute "authorized personnel" and
whether that should be formalized and identified within the
documents to ensure accountability and support the protection
of privacy and personal information. The Policy Holder advised

- that it would be dependent on the location and specifics of the matter. *No change needed.*
- Regarding s. 5.1.2 of the Policy, the Committee recommended changing the American term "restroom" to the Canadian term "washroom". Change made.
- Regarding s. 5.3.3.3 (Now s. 11.9.3.3 of Appendix E) of the Procedure, the Committee emphasized the need for this amendment to come into force as soon as possible as the current procedure requires additional approval steps which may impede local authorities responding to an emergency (i.e. a missing child). No change needed.
- Regarding s. 5.3.3.4 (Now s. 11.6 Appendix E) of the Procedure, the Committee noted the large amount of text and requested that larger sub-sections be shortened. It was suggested that this could be done by further dividing up s. 5 so that more of the page could be used. Changes made.
- Regarding s. 5.3.6.1 (Now s.12.2 Appendix E) of the
 Procedure, the Committee questioned what the assessment
 entailed and whether this assessment criteria would be
 available / attached to the Procedure. The Policy Holder
 advised that there is not a specific assessment and that the
 determining factors would be determined at the time of the
 decision. The Committee raised concerns about the ability for
 bias to influence the process, the perception of bias, the lack of
 transparency, and the need for procedural fairness. The Policy
 Holder advised that she would be open to looking further into
 addressing these concerns. Changes made.
- Regarding s. 5.3.6.2 (Now s. 12.2 Appendix E) of the Procedure, the Committee noted that the current wording suggests that the Director of Education will approval all requests for covert surveillance and recommended changing the wording to say that "All requests for the use of covert surveillance will require approval by the Director of Education (or their designate)". Changes made.

The draft policy and procedure were first presented to Administrative Council for their review and feedback on February 3, 2025. Following the EIE Committee meeting the updated draft policy and procedure were brought to Administrative Council for their feedback. Both the draft policy and procedure were updated based on comments received.

Financial Implications:

NA

Timeline:	Policy Working Committee will review on April 8, 2025, with anticipated circulation to the public for feedback to follow.
Communications:	Not applicable until the final versions of the policy and procedure are approved. If approved, the updated policy and procedures will be communicated via the policy and procedure system email.
Appendices:	APPENDIX A - 2017 Policy and Procedure Checklist APPENDIX B - EIE Review Summary - Security Cameras and Digital Imagery Policy & Procedure APPENDIX C - 2017 CLEAN - Security Cameras and Digital Imagery Policy APPENDIX D - 2017 MARK UP- Security Cameras and Digital Imagery Policy APPENDIX E - 2017a CLEAN – Security Cameras and Digital Imagery Procedure APPENDIX F - 2017a MARKUP – Security Cameras and Digital Imagery Procedure

Connection to Strategic Directions:

We value students' individual educational paths and provide the tools and resources necessary for student achievement including students with special education needs: Yes

To support student achievement, our schools and workplaces must be safe spaces for all: Yes

Our goal is to become Ontario's leader in education by fostering a culture of innovation and excellence: Yes

To inform our decision-making, we will build positive, trusting relationships across our district by increasing community engagement that is accessible, accountable, and transparent: Choose an item.

Revised October 2024