

ADMINISTRATIVE PROCEDURE

General Administration

Video Surveillance on CTR Property

GEN #09

Revised: September 2026

Background

Christ The Redeemer Catholic Schools (CTR) believes that the maintenance of a safe and secure learning and working environment, as well as the protection of CTR property and the property of others, are important functions. CTR also believes that individuals should experience reasonable levels of privacy while on CTR property and should have the opportunity to learn and work in an environment that is as minimally intrusive as possible.

In balancing the actions associated with these beliefs, CTR recognizes the value of video surveillance systems and supports their limited use on CTR property. Such use shall comply with all federal and provincial legislation and regulation.

The use of video surveillance on CTR property is authorized where circumstances have shown that it is warranted and the potential benefits have been determined to outweigh the loss of privacy of those observed.

In addition, CTR believes that where a video surveillance system is employed in a school, its purpose shall be to augment, rather than to replace direct supervision provided by members of a school staff. Video surveillance shall only be used to supplement the proactive efforts of CTR to educate its students. Specifically, it is not meant to replace the school's responsibility to teach its students to be responsible citizens. It is also not meant to replace the school's responsibility to create a safe and caring environment characterized by trust, mutual respect, and a shared sense of pride for the school.

Definitions

1. Video surveillance system means a mechanical, electronic or digital device that enables continuous or periodic observing, monitoring or recording of individuals in school buildings and on school premises
2. Visual recording includes a photographic, film or visual recording made by any means.
3. Real time monitoring means the viewing of images presented on a video or computer monitor as and when the events presented by those images are occurring.

Procedures

1. Use of Video surveillance systems:
 - 1.1. Video surveillance systems may be used to monitor and/or record activity that occurs on property that is owned or leased by CTR and/or school buses or other means of transportation contracted by CTR for the use of its students.
 - 1.2. Video surveillance systems may be placed only in areas where surveillance has proven to be necessary or warranted as a result of the occurrence of property damage or related security

- incidents, or in areas where upon reasonable grounds the surveillance is deemed to be a deterrent.
- 1.3. Video surveillance systems in areas outside of school buildings shall only be positioned where it is necessary to protect external assets and/or to provide for the personal safety of individuals on school grounds or premises.
 - 1.4. Before video surveillance is introduced to a site, a written request must be submitted to the Superintendent, describing the circumstances that would support having surveillance at that location.
 - 1.5. Before implementing a new video surveillance system, materially expanding an existing system, or introducing new surveillance functionality, the Division shall complete a privacy review to identify and address privacy requirements, including whether a privacy impact assessment is required under POPA and applicable regulations. Where a privacy impact assessment is required, it shall be completed before implementation.
 - 1.6. Formal approval must be received from the Superintendent before video surveillance is introduced.
 - 1.7. Video surveillance camera locations must be authorized by the Superintendent or designate. Any change in camera location must be authorized in the same manner.
 - 1.8. Video surveillance cameras shall be set up and operated to collect the minimum amount of information to be effective and shall not be directed to look through the windows of adjacent buildings located outside of school property.
 - 1.9. Video surveillance systems shall not use facial recognition, biometric identification, automated decision-making, or other advanced analytics unless specifically authorized by the Superintendent or designate, reviewed through the Division's privacy process, and implemented in compliance with POPA, applicable regulations, and Division procedures.
 - 1.10. Video surveillance cameras shall not be used to monitor areas where individuals have a reasonable expectation of privacy. Such areas shall include, but shall not be limited to, change rooms, washrooms and private conference/meeting rooms.
 - 1.11. Visual recordings may be reviewed, used or disclosed only when reasonably necessary for the approved purposes of the system, including safety and security, protection of CTR property, investigation of a specific incident, student or employee conduct or disciplinary matters, a legal claim or insurance matter, or law enforcement purposes where authorized by law.
 - 1.12. Clearly visible signage shall be posted at the perimeter of the surveillance areas advising users of the premises of video surveillance along with contact information for inquiries.
2. Security:
- 2.1. Only designated employees or agents of CTR may install, maintain, administer or access video surveillance systems, live feeds or visual recordings. Access shall be limited to individuals who require access for an authorized purpose. CTR shall maintain an up-to-date list of authorized users, prohibit shared credentials and promptly remove access when it is no longer required.
 - 2.2. Any vendor-hosted or contractor-managed surveillance system remains under CTR's custody/control. Vendors must comply with CTR's privacy, security, retention, and access requirements, and no vendor may use or disclose recordings except as authorized by CTR and law enforcement.
 - 2.3. Visual recordings shall be kept in secure storage and in an area to which students and members of the public do not have access.
 - 2.4. Visual recordings shall only be viewed and used in accordance with this procedure and may never be sold, publicly viewed or distributed in any other fashion except as provided for by this procedure and appropriate legislation.

- 2.5. Video surveillance systems and visual recordings shall be managed in accordance with this Procedure, CTR's Privacy Management Program, applicable records management and retention requirements, and the Protection of Privacy Act.
- 2.6. Any loss, unauthorized access, disclosure, or compromise must be reported immediately to CTR's Access and Privacy Coordinator.
3. Real Time Monitoring:
 - 3.1. Real time monitoring may be used to manage access at designated entrances and to respond to an immediate safety or security concern, suspected misconduct or property damage. The school principal must approve real time monitoring arrangements and designate authorized viewers.
 - 3.2. The monitor used for real time monitoring shall be located in an area under the direct supervision of the principal or designated employee and in a position that enables viewing only by an authorized individual.
4. Viewing of visual recordings:
 - 4.1. An individual or a parent/guardian acting on behalf of a student where authorized by law, may request access to a visual recording containing their personal information under the Access to Information Act, subject to applicable exceptions. CTR shall take reasonable steps to protect third-party personal information. Access may be provided through a redacted excerpt, supervised viewing or another appropriate method, or may be limited or refused where third-party privacy cannot reasonably be protected
 - 4.2. Requests from students, parents or guardians to view a recording shall be referred to the Access and Privacy Coordinator. CTR may provide a redacted or edited excerpt, supervised viewing or another appropriate form of access, and may withhold or sever information where necessary to protect the personal information of a third party or where otherwise authorized by law. Visual recordings may only be disclosed where authorized under POPA or released in response to an access request under ATIA.
 - 4.3. Except in an emergency or where disclosure is otherwise required by law, a written request shall be obtained before releasing a visual recording to an external authority or third party. The record of release shall identify the reason for the disclosure, the legal authority relied upon, the individual or organization receiving the recording, the date and time period of the recording, and whether a copy, excerpt or supervised viewing was provided.
5. Retention of visual recordings:
 - 5.1. Visual recordings shall be erased or otherwise disposed of after 30 days, unless they are to be retained at the request of the school principal, CTR official, employee, parent or student for documentation related to a specific incident or are being transferred to CTR's insurers.
 - 5.2. Visual recordings retained under 5.1 above shall be erased or otherwise disposed of as soon as the incident in question has been resolved, except when the visual recording has been used in the making of a decision about an individual. Visual recordings that have been used to make a decision directly affecting an individual shall be retained for a minimum of one (1) year following the expiration of any hearing or proceedings at which the recording was used and/or the expiration of any appeal period for such proceeding, unless longer retention is otherwise required.
 - 5.3. Where an incident raises a prospect of a legal claim against CTR, the visual recording, or a copy of it, shall be sent to CTR's insurers and/or legal counsel.

6. Review:

- 6.1. Each school principal or site supervisor is responsible for the proper implementation and control of the video surveillance system at a particular site.
- 6.2. All surveillance operations are subject to audit and school principals, and site supervisors may be called upon to justify any aspect of their use of video surveillance.
- 6.3. Each video surveillance installation shall be reviewed annually by the principal or site supervisor to confirm that it remains necessary, proportionate, and effective, and that less privacy-intrusive measures would not reasonably achieve the same purpose.
- 6.4. All CTR video monitoring shall be carried out in accordance with this Procedure. Wrongful or improper use of video surveillance shall be dealt with appropriately by the Superintendent in a timely manner.