

Revised: March 2026

Background

The Board of Trustees of Christ The Redeemer Catholic Schools (Board) believes that the maintenance of a safe and secure learning and working environment, as well as the protection of Board property and the property of others, are important functions of the Board. The Board also believes that individuals should experience reasonable levels of privacy while on Board 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, the Board recognizes the value of video surveillance systems and supports their limited use on Board property. Such use shall comply with all federal and provincial legislation and regulation.

The Board therefore authorizes the use of video surveillance on Christ The Redeemer (CTR) Catholic Schools' property 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, the Board 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 Catholic 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 actually 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 Catholic and/or school buses or other means of transportation contracted by CTR Catholic 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 determine whether a privacy impact assessment is required under POPA and applicable regulations, and complete that process 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 used by the Board as evidence in any disciplinary action brought against an individual arising out of the individual's conduct on or about Board property and/or to detect criminal offenses that occur in view of the camera.
 - 1.12. Clearly visible signage 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 a designated employee or agent of CTR Catholic is permitted to install video cameras. Only the school principal, designated employees or agent of CTR Catholic shall have access to the key that opens the camera boxes. Only these individuals shall handle the camera or visual recordings.
- 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. Surveillance records are subject to CTR's Privacy Management Program.
- 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 shall only be used when there is a reasonable expectation of misconduct impacting the safety and security of students, staff or volunteers, and/or property damage. The school principal must approve all instances of real time monitoring.
 - 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 the principal or designated employee.

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, and may request correction of their personal information in accordance with the Protection of Privacy Act, subject to applicable exceptions.
 - 4.2. Video monitors used to view visual recordings shall not be located in a position that enables public viewing. Visual recordings may only be viewed by CTR Catholic personnel authorized by the Superintendent or designate, the school principal or, by law enforcement officers who have been given access to visual recordings, by employees or agents of CTR Catholic who have responsibility for technical operations of the system (for technical purposes only) and subject to paragraph 4.3 below, students and parents of such students who are associated with a recorded incident. If an individual is facing disciplinary action, he/she may authorize his/her representative or other advocate to also view a specific visual recording if viewing is authorized by CTR. Parents or guardians may review a segment of visual recording related to a specific incident involving their child or children, unless the review might violate the privacy of a third party. In that case, the review should not take place unless authorized by the Superintendent or designate.
 - 4.3. Visual recordings may only be disclosed where authorized under POPA or released in response to an access request under ATIA.
 - 4.4. The Superintendent or designate shall require a written request is provided before releasing visual recordings to appropriate authorities or third parties. This written request shall indicate the reason for the request, the individual or organization to which the visual recording has been given, the date on which the visual recording was taken.

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 Catholic official, employee, parent or student for documentation related to a specific incident, or are being transferred to CTR Catholic'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 Catholic, the visual recording, or a copy of it, shall be sent to CTR Catholic's insurers.
 - 5.4. Visual recordings shall be disposed of in a secure manner.

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 periodically 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 Catholic 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.