



## Video Surveillance Policy

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**Board Amended:**

**Policy Number:** 105

### Policy Purpose

Spectrum seeks to promote and foster school safety and a safe and effective educational and work environment. After having carefully considered and balanced the individual's right to be free from invasion of privacy with the school's interest and duty to promote the health, welfare, and safety of students, staff, and the general public and enhance the protection of school property, Spectrum supports and reserves the right to place and use surveillance cameras, when necessary and appropriate, in its schools, school facilities, school buses, and/or on its school grounds.

### Purpose of Surveillance Cameras

The primary uses of surveillance cameras are as follows:

- a. to promote a safe environment by deterring conduct that violates the law, and/or school rules and policies;
- b. to record images for future identification of individuals in the event of violations of law, and/or school rules or policies;
- c. to aid in search of lost or missing people; and
- d. to assist emergency services personnel.

Surveillance camera use is limited to uses that do not violate federal or state constitutional protections. Surveillance cameras will be utilized in public areas of schools, school facilities, school buses, and school grounds, and in areas of schools, school facilities, school buses and school grounds deemed to be at risk for either vandalism or student misconduct. Surveillance cameras will not be used in the private areas of restrooms, showers, locker rooms and dressing rooms, and any other area in which there is a reasonable expectation of privacy. Surveillance cameras also will not be used in private offices and classrooms. Surveillance cameras will not monitor or record sound. The use of surveillance cameras and the monitoring of any resultant recordings will be conducted in a professional, ethical, and legal manner and in a manner consistent with all existing Spectrum policies and state and federal laws.

Surveillance cameras are not a guarantee of safety, but are a tool that can help to deter crime and assist in promoting the safety and security of individuals and property. Surveillance cameras are implemented as a passive system; no school staff will be designated to view live events in real time on a minute by minute basis. Additionally, surveillance cameras shall not utilize automatic identification, facial recognition, or automatic tracking technologies. Only authorized school personnel, as determined by the Executive Director or designee, shall be involved with and/or have access to surveillance cameras and any resultant recordings. Additionally, surveillance cameras will be installed and configured to prevent tampering with or unauthorized duplication of recorded information. Furthermore, no surveillance cameras will be installed unless said installation has been approved in advance by the Executive Director or designee. Surveillance camera recordings are not considered Directory Information and may be subject to confidentiality restrictions, including but not limited to requirements under the Federal Family Educational Rights Privacy Act. In no instance will surveillance cameras be used to observe and/or evaluate the performance of school staff or to monitor employees during nonworking time. However, cameras may be used to monitor areas in which an employee works, even if there is only one employee in that area. Cameras installed or utilized for criminal investigations by law enforcement agencies are subject to appropriate state and federal laws and are excluded from the scope and application of this policy. This policy also does not apply to legitimate academic use of video cameras for educational purposes that have been approved by a school principal.

### Implementation, Installation of Surveillance Cameras

Spectrum administrative, technology, and facilities personnel will meet as necessary to develop, implement, and review safety practices and make recommendations to the Executive Director regarding the implementation, installation, and use

of surveillance cameras. The Executive Director or designee shall retain final decision-making authority. Decisions regarding appropriate use and implementation of surveillance cameras in the schools, school facilities, school buses, and/or on school grounds, will be guided, at a minimum, by the following considerations:

- a. Demonstrated need for the device at designated location(s);
- b. Appropriateness and effectiveness of proposed protocol(s);
- c. The use of additional, less intrusive means to further address the issue of school safety (e.g., restricted access to buildings, use of pass cards or identification badges, increased lighting, alarms);
- d. Right to reasonable expectation of privacy and other legal considerations; and
- e. Expense involved to install and to maintain the use of surveillance cameras at designated locations.

The Facilities Director shall maintain a current up-to-date record of locations of installed surveillance cameras.

### **Monitoring**

All Spectrum employees involved in video monitoring of public areas will perform their duties in accordance with the practices outlined in this policy.

Video surveillance monitors shall be located in areas to which access is reasonably controlled and shall not be viewable by unauthorized persons.

Video recording may only be monitored by designated technology staff, the Executive Director, the Facilities Director, the Facilities Manager, the Dean of Students, Principals, and other select Spectrum staff as authorized by the Executive Director. No unapproved employees may monitor or view recorded video or camera images for any reason except as necessary in the course of an investigation. *Viewing a monitor in real time for security purposes, such as is necessary at the entrances of each building, is different from viewing recorded footage.*

Emergency personnel may need to view recorded footage for legal purposes. A subpoena may be required to obtain such access.

Occasionally, parents/guardians request access to a recorded video of their student. If there is a recording and it is considered part of the student's educational record under the Family Educational Rights and Privacy Act (FERPA), Spectrum will provide access within the timeline required by FERPA. Spectrum will make an effort to protect the identity of other students/minors who may be included in the recording.

Any employee violating this policy may be disciplined, up to and including termination.

All staff approved to monitor video or camera images shall receive a copy of this policy.

An electronic log will be maintained by the IT Department that will record the name and date a staff member views any recorded footage. Only the IT Department has permission to make a copy of a recording from the video surveillance system unless receiving specific written authority from the Executive Director. The Executive Director is to be notified when a copy of a recording takes place.

### **Storage**

Any video recording used for surveillance purposes in school facilities, school buses, and/or on school grounds shall be the sole property of Spectrum. Video footage will be stored and accessible on the surveillance system until the system reaches capacity. After that timeframe, such footage will be automatically erased unless retained as part of a criminal investigation, court proceeding (criminal or civil), or other bona fide use, as approved by the Executive Director or designee; and the Executive Director or designee will be the custodian of such recordings and all such recordings shall be properly protected from unauthorized viewing. A record log will be kept of all instances of access to and use of recorded material.

**Release of Information**

Public records request for viewing a recording must be made in writing to the Executive Director or designee and will likely be reviewed by legal counsel. The request shall identify the individual for whom access is sought, the date(s) and/or time period(s) for which access is sought, and the rationale why access should be granted. If the request is granted, such viewing must occur in the presence of the Executive Director or designee. Under no circumstances will the School's video recording be duplicated and/or removed from the school premises without the express written authorization of the Executive Director or designee. *Also see "Monitoring" early in this policy.*

**Signage and Notification Regarding Use of Surveillance Cameras**

Appropriate and conspicuous signage will be posted at entrances to schools, school facilities, and school grounds, and/or at major entrances into schools and school facilities, school buses, and school grounds notifying students, staff, and members of the general public of the school's use of surveillance cameras. For exterior cameras, signage will be posted in a conspicuous place in close proximity to the surveillance camera; and for interior cameras, signage will be posted in a conspicuous place at or near the entrance to each place being monitored.

Students and staff will receive additional notification, as appropriate, regarding the use of surveillance cameras in the schools, school facilities, school buses, and/or on school grounds. Such notification may include, but is not limited to, notice of the use of surveillance cameras being published on the school website (under Board Policies), and in the Employee and Student/Family Handbook. Such notification does not preclude, as deemed appropriate by school administration, the discussion of the use of surveillance cameras with staff and students to heighten awareness and help foster a sense of security.

**Destruction and/or Tampering with Surveillance Cameras**

Any individual who tampers with or destroys a video surveillance camera or any part of the video surveillance system will be subject to appropriate disciplinary action as well as possible criminal charges.