



BOARD POLICY NO.: 2020.051

Video Surveillance and Electronic Monitoring Policy

Overview

This policy governs the implementation of video surveillance and electronic monitoring systems on Great Valley Academy (GVA) property and buildings. This policy does not apply to GVA and parentally-created video recordings of school events (e.g. performances, athletic contests, graduation), video recordings used for instructional purposes and made with the consent of all parties recorded, video recordings made of individual teachers for the purpose of improving classroom instruction, or surveillance (covert or otherwise) undertaken by law enforcement.

Use of Camera Recordings

GVA may use security cameras and the resulting recordings throughout the year for:

- a. The promotion of a safe environment;
- b. Student and employee disciplinary proceedings;
- c. The protection of GVA property;
- d. Adherence to all legal and administrative directives; and
- e. Inquiries and proceedings relating to law enforcement.

GVA shall not use security cameras for other purposes unless expressly authorized by the Chief Executive Officer. Only GVA personnel or individuals authorized by the Chief Executive Officer or designee shall have access to security cameras, monitors, or monitoring tools and be permitted to operate the controls, capture, or share footage.

Camera Location, Operation and Control

GVA grounds, buildings and property including vehicles used for GVA purposes may be equipped with security cameras. Equipment may be placed to monitor areas where there is not a reasonable expectation of privacy, such as school vehicles, school grounds, parking lots, entrances, exits, hallways, front offices, auditorium and athletic areas, cafeterias, libraries, and other public, shared, or common spaces.

Security cameras shall not be placed to monitor areas where there is a reasonable expectation of privacy, including locker rooms, changing rooms, private offices, conference rooms, and restrooms.

Only personnel authorized by the Chief Executive Officer or designee shall install or adjust security cameras or related equipment.

This procedure does not apply where a law enforcement agency presents a search warrant authorizing the agency's installation of video or audio surveillance on GVA property.

Security cameras shall monitor and/or record only video images where state or federal law restricts the use of audio recordings.

Notification of Use of Security Cameras

Appropriate signage will be posted at major entrances to school buildings and school grounds that notify students, staff and the community of GVA's use of security cameras. Signs will also be posted in other conspicuous locations informing persons that the buildings and grounds may be under electronic surveillance. Students and staff will receive additional notification at the beginning of the school year regarding the use of security cameras in the schools and on school grounds. Such notification will include, but not be limited to, student and staff handbooks, and shall identify key procedures and reference the GVA policy. During the initial implementation period, the Chief Executive Officer may vary notification based on circumstances and available options.

Expectation of Privacy

Except in areas where there is a reasonable expectation of privacy (including locker rooms, changing rooms, private offices, conference rooms and restrooms), all conduct on Great Valley Academy property is subject to being recorded, preserved and examined by means of security cameras. Except in areas where there is a reasonable expectation of privacy, no person on GVA property shall have a legitimate expectation of privacy with respect to his or her conduct.

Video Monitoring and Viewing

Real-time surveillance monitors may be viewed by any authorized school GVA personnel and Law Enforcement. Viewing is not limited to GVA personnel where monitors covering public spaces are within public view. Preserved footage recordings shall be viewed only by GVA personnel authorized by the Chief Executive Officer or designee in a setting that ensures controlled access, inability to tamper with the footage, and privacy from accidental public viewing.

Non-school personnel will be authorized to view preserved camera footage on a case-by-case basis by the Chief Executive Officer or designee. Preserved footage will be released by the Chief Executive Officer or designee in limited circumstances on a case-by-case basis as follows:

- a. In order to protect the health and safety of all students, recordings that reveal unlawful actions will be brought to the attention of and/or released to law enforcement agencies;
- b. A parent/guardian of a student pictured on preserved camera footage may be permitted by the Chief Executive Officer or designee to view camera footage;
- c. A parent/guardian of a student shall be permitted to view any preserved camera footage that is used in a disciplinary action against their child;
- d. In response to a public records request, the GVA will provide preserved camera footage unless otherwise exempt; or
- e. In response to a subpoena or court order.

An individual may be refused permission to review a video recording when allowing it may:

- a. Be an unreasonable invasion of a third party's personal privacy;
- b. Give rise to concern for the safety of a third party;
- c. Constitute an unauthorized disclosure of student personally identifiable information under state and/or federal law; or
- d. Interfere with or compromise a law enforcement investigation/matter.

Protection of Information and Disclosure

All camera recordings are stored in a secure place to avoid tampering and ensure confidentiality in accordance with applicable laws, regulations, and these procedures.

Typically, recordings will be saved for at least fourteen calendar days. If, after this time, no incidents have been reported that potentially violate student or employee behavior or other expectations and no public records request has been made seeking the footage, camera footage may be over-written by the systems as storage space is needed for newer recordings. The Chief Executive Officer is authorized to keep these cameras in operation until their useful life expires.

The Chief Executive Officer or designees may preserve any available footage by creating an electronic copy relevant to a possible discipline action, criminal, safety, or security investigation(s) or for other evidentiary purposes. The Chief Executive Officer shall establish protocol to define the storage specifications of preserved footage.

No Guarantee of Recording

By this policy, GVA does not guarantee that every school interior, parking lot, general grounds, building, or vehicle will be equipped with a security camera, that the security camera in a specific area or on a specific bus will be in operation at a specific time, or that a security camera will record specific conduct or expression, or that security camera resolution will be sufficient to capture images with clarity in all circumstances.

Miscellaneous

The Chief Executive Officer is authorized to develop forms and administrative protocols to implement these procedures.

It is a violation of the policy to interfere, obstruct, or disable any of GVA's cameras or recording systems. This includes, covering the cameras, cutting the wires, or disabling the system in any way.

This procedure does not apply to the monitoring of the GVA's technology system or employee use of the GVA's technology system.

The effectiveness of this set of security camera operations procedures shall be reviewed on a regular basis by the Chief Executive Officer or designee.

Date Approved: 1.27.2020



Signature, President or Secretary

Board Action: **Motion: NISAN SECONDED: WOLF**

AYES: **WOLF, MERAZ, PAYNE, NISAN**

NAYS: **NONE**

ABSENT: **TOSH, JAMISON**

ABSTAIN: **NONE**