

# Surveillance Systems Administrative Directive

## I. <u>Purpose</u>

The purpose of this administrative directive is to establish processes and procedures for the PPS surveillance system program and to address legal and regulatory requirements, crime prevention, security, safety, and accountability while safeguarding district property and assets. Video surveillance cameras may be used in locations deemed appropriate by the Security Services Department and where individuals have no reasonable expectation of privacy. The district shall notify staff and students through student/parent and staff handbooks that video surveillance may occur on district property and on school transportation vehicles. Students or staff in violation of Board policies, administrative regulations, building rules, or the law shall be subject to appropriate disciplinary action. Others may be referred to law enforcement.

### II. Administration of Video Surveillance Systems

The district's Security Services Department is responsible for the administration and oversight of video surveillance systems for all PPS schools and facilities, while the PPS Transportation Department is responsible for administration and oversight of video surveillance on transportation vehicles. Security Services will be supported by the Facilities Department for installations and repairs of devices and the Information Technology Department for system support. Security Services may delegate some or all of their responsibility to other departments to accommodate specific video surveillance functions or unique situations that warrant such delegation.

## III. Access & Viewing Privileges

The video surveillance system is primarily used for the safety and security of the campus. Surveillance footage will only be reviewed when a specific incident is reported or suspected, and there is a need to investigate the situation. These incidents may include, but are not limited to, reports of theft, vandalism, safety concerns, or other events that may require further examination to ensure the safety and security of students, staff and the community.

Access to the surveillance system is tiered based on roles and responsibilities.

- A. Security Services has the ability to view live feeds and view/download recorded video.
- B. School administrators have the ability to view live feeds and playback recorded video.
- C. School office staff have the ability to view live feeds only.

Procedures for managing any viewing request will follow all appropriate laws, policies, and collective bargaining agreements. If the recording is determined to be a legally

protected educational record, viewing requests will be considered following the Family Educational Rights and Privacy Act (FERPA).

Parents and/or legal guardians can come to the school to view the recording with a building administrator. The video recording shall not be released/sent to parents and/or legal guardians. Prior to reviewing the video recording with a parent or legal guardian or for use in a disciplinary hearing, the school administrator shall have the PPS Communication Department ensure there are no other identifiable students and/or staff in the recording.

Videos of student restraints and seclusion will be preserved as an educational record and available for parent/guardian review pursuant to <u>Administrative Directive</u> <u>4.50.060-AD</u> Student Restraint and Seclusion.

For disciplinary incidents, both the complainant(s) and respondent(s) have the right under FERPA to view the recorded video.

### IV. <u>Downloading Video</u>

Security Services will be responsible for downloading all video needed by school administration, central office administration, and law enforcement. To protect the chain of custody under rules of evidence, law enforcement will obtain video directly from Security Services. School staff shall refer law enforcement to contact Security Services directly for downloaded video.

School staff will not share or otherwise provide video in any way to any person outside PPS. When ordered by court documents, video will be released. District/school staff who are authorized and directly involved in the investigation or its resolution will be the primary individuals with access to video. All access to video footage will be subject to applicable privacy laws and district policies to ensure confidentiality and security. Access to video footage by community partners and contracted staff will be granted on a case-by-case basis, and only when there is a clear and documented need related to an ongoing investigation or safety concern.

Any outside entity requesting video shall be referred to Security Services, who will review the request. If there is any question as to whether or not the video should be released, Security Services will refer the requestor to the General Counsel's Office. A written log will be maintained of those viewing video recordings, including the date of viewing, the reason for viewing, and the date the recording was made.

## V. <u>Retention of Video</u>

Recorded video that has not been downloaded for a specific purpose will be overwritten after 30 days as the storage drive reaches capacity, beginning with the oldest stored video.

Video that has been downloaded by Security Services will be stored on a backed-up drive for a period of not less than five years. The Security Services staff member who downloaded the video will be responsible for ensuring the video is properly stored and

will be the custodian of that record. Video recordings remain the property of the district and may be reproduced only in accordance with law, including applicable district education records policies and procedures, district personnel records policies, and applicable collective bargaining agreements.

A video recording may become a part of a student's educational record or a staff member's personnel record. The district shall comply with all applicable state and federal laws related to record maintenance and retention.

### VI. Surveillance Camera Placement

Surveillance cameras will be placed in PPS facilities where individuals have no reasonable expectation of privacy. PPS staff will use the most current PPS design standards, section 28: Electronic Safety and Security, as a guide for interior and exterior camera placement. Temporary cameras may be used for a period of time where there are no permanent surveillance cameras installed, and there are concerns of unlawful activity or employment policy violations. Temporary cameras will only be placed in areas where there is no reasonable expectation of privacy.

### VII. Obstacles Blocking Camera View

Staff members, contractors, and volunteers will be mindful when placing posters, banners, flags, or any other object that may obstruct the view of any camera. If students are placing any items that may obstruct camera views, staff will check the items to make sure cameras are unobstructed.

Once an item has been found to be obstructing a camera view, it will be immediately removed or moved to another location so it no longer obstructs any camera.

#### VIII. <u>Reporting Damage to Camera Hardware</u>

Cameras, monitors, and controlling hardware that are lost, stolen, or damaged shall be reported to Security Services as soon as possible using the PPS Support Portal. If a response is not received within 24 hours, a follow-up phone call to Security Services (503-916-3000) or email to (securityservices@pps.net) should occur. Staff and students are prohibited from tampering with or otherwise interfering with video camera equipment.

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