



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### USE OF SECURITY CAMERAS

#### Policy Statement:

1. Security cameras may be installed in situations and places where the security of either property or people would be enhanced.
2. When appropriate, fixed cameras may be placed throughout the District, inside and outside of District buildings, security guards, or vehicles.
  - a. Cameras will be used in a manner consistent with all existing District policies; and
  - b. Camera use will be limited to situations that do not violate the reasonable expectation of privacy as defined by law. Generally, an individual has no reasonable expectation of privacy in public places or common areas, including, but not limited to:
    - Classrooms
    - Offices
    - Hallways
    - Parking lots
    - Cafeterias
    - District owned or leased transportation

#### Policy Purpose:

1. The purpose of this policy is to regulate the use of security cameras.
2. The function of security cameras is to assist in protecting the safety and property of the District.
3. The primary use of security cameras will be to record images for future identification of individuals involved in criminal activities.

#### Policy Requirements:

1. School administration, campus security and/or technology individual(s) is/are designated to be involved with, or have access to, District security camera data.
2. When an incident is suspected to have occurred, the individual designated under paragraph 1 of this section may review the images from the security camera data.
3. No video data may be copied, e-mailed, downloaded or otherwise distributed without prior authorization.
4. The installation of new security cameras must be approved in advance by the Superintendent or designee. The Superintendent may authorize the use of security cameras when he/she deems the use in the best interest of the District.
  - a. Once approved, new security cameras, except in limited instances approved by the Superintendent or designee, must connect to the District's centralized security system which will be maintained by the IT Department.
5. No employee, student, staff, administrator, media or member of the public is allowed to install or conceal camera devices in or around District property.
6. Any person acting to remove, alter, bypass, disconnect or otherwise affect the operation of any camera or monitor installed in, or around, District property or vehicles without the express prior approval of the Superintendent or designee, or who violates this policy, will be subject to disciplinary or other adverse action including, but not limited to, removal from District property and prosecution.



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### USE OF SECURITY CAMERAS

#### School Buses and District Vehicles:

This policy also provides for the use of security cameras on District buses or District vehicles for disciplinary and security purposes. This policy will support efforts to maintain discipline and to ensure the safety and security of all students, staff, contractors and others being transported on District-owned, operated, or contracted buses or vehicles. The Transportation administrators or designee(s) are responsible for installation and maintenance of bus cameras and Digital Video Recording (DVR) systems. Transportation administrators or designee(s), after consultation with building administrators at the school the student attends, are authorized to take appropriate transportation-related disciplinary action to correct any inappropriate behavior reflected on the recording.

Each bus shall have posted in a place visible to all passengers a sign/sticker advising of the video and/or audio recording.

Video recordings will be retained routinely for no more than 30 days; provided, however, that if a disciplinary action is taken as a result of conduct disclosed by the video recording, that video recording shall be retained until such time as the disciplinary action is completed. Video/audio recordings will be considered “student records” and appropriate privacy practices will be observed.

School bus means a motor vehicle that is designed to carry eleven (11) passengers or more, including the driver, and is used for the transportation of District students to or from other schools or events related to such schools or school-related activities.

The use of security cameras shall not place a duty on the District to regularly monitor live camera images and/ or video or audio recordings, and it shall not place on the District any additional duty in regard to providing a safe facility.

A security camera will not necessarily be installed in each and every vehicle owned, leased, contracted and/or operated by the District, but cameras may be rotated from vehicle to vehicle without prior notice.

#### Notification Requirements:

Except in emergency or investigative situations, all locations with security cameras will have signs displayed that provide reasonable notification of the presence of security cameras.

Notification signs shall be placed in conspicuous areas. For buildings with interior cameras, this shall include, at a minimum, the placement of signs at all primary building entrances. All such signs shall contain a notification that the cameras may or may not be monitored.

#### Related Policy Information:



## SECTION IV: STUDENTS

## POLICY 4270

### USE OF SECURITY CAMERAS

1. Recorded security camera data must be retained for a period of at least 14 days unless retained as part of a student discipline record, criminal or civil investigation, court procedure, or other bona fide use;
2. Security camera data is not considered to be Directory Information and may be subject to confidentiality restrictions including, but not limited to, FERPA requirements.
  - a. Requests to release information obtained through security cameras must be submitted to the Superintendent or designee and approved prior to release.

#### Body Cameras:

##### Purpose:

The Broken Arrow Public Schools security department has provided each of its certified guards with access to audio and wearable Body Worn Cameras (BWC) for use while on duty. These recorders are intended to assist guards in the performance of their duties by providing an unbiased audio/video records of a contact and to supplement the guard's report of an incident. They are also intended to enhance the mission of the department by accurately capturing contacts between members of the department and the public.

The BWC is designed to assist and compliment campus security guards in the performance of their duties. The BWC is used to record certain activities by providing a visual and audio record of the circumstances of certain incidents.

All recordings made by personnel acting in their official capacity as members of this department shall remain the property of the school district and should not be considered private, regardless of whether those recordings were made with department issued or personally owned recorders.

##### Procedure:

#### **1. Security guards' safety takes precedence over recording events.**

Security guards shall follow safety policies when interacting with students or patrons. Security guards' safety shall be the primary consideration when contacting citizens not the ability to record an event.

#### 2. General

- a. Only authorized personnel shall use or be in possession of a BWC device.
- b. BWC equipment is for official use only and shall not be utilized for personal use.
- c. Security guards shall not tamper with or dismantle any hardware or software components of any BWC device.
- d. The use of any other personal recording device for the same purpose is not authorized with out permission of the superintendent or designee.
- e. All digital evidence collected using the BWC is considered a record of the Broken Arrow Public Schools and is for official use only.



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### **USE OF SECURITY CAMERAS**

- f. Accessing, copying, forwarding or releasing any digital evidence for other than provided for in this policy is strictly prohibited. Public release of digital evidence is prohibited unless approved by the Superintendent or designee.
3. Advisement about Recording
    - a. Private citizens do not have a reasonable expectation of privacy when talking with a security guard during the scope of a guard's official duties. Therefore, guards are not required to give notice they are recording. However, if asked, guards shall advise the citizens they are being recorded.
    - b. Guards are not required to initiate or cease recording an event or circumstance solely at the demand of a citizen.
    - c. Guards and supervisors involved in the investigation if a complaint against a member of the Broken Arrow Public Schools Campus Security must inform complainants and witnesses they are being recorded.
  4. When and Where to Record
    - a. Security Related Contacts
      - i. Security related contacts include the following: field interviews, detentions, detainment, persons at radio calls who are accused of violating school rules, and consensual encounters in which the guard is attempting to develop reasonable suspicion on the subject of the encounter.
      - ii. Covering another Broken Arrow Public Schools security employee during a contact.
    - b. Detainment
      - i. Guards may stop recording when the detainee is cooperative and safely secured inside an administrator's office or a Broken Arrow Police Department police car. If the detainee becomes uncooperative, or if there is some evidentiary purpose, guards should resume recording.
    - c. Student Interviews
      - i. Guards are encouraged to fully record students interviews
      - ii. When recording interviews, guards shall ensure they record any admonishments prior to the start of an interview.
    - d. Consent Searches, Etc.
      - i. During the execution of a school policy search, or a consent search in which the guard is looking for evidence or contraband with an administrator.
    - e. Special Events
      - i. Officers use of the BWC's at special events is at the discretion of Broken Arrow Public Schools.
  5. When and Where NOT to Record
    - a. BWCs shall not be used to make recordings depicting Broken Arrow Public Schools students or minor children that are not made during or as part of an investigation including but not limited to, recordings of routine interactions with students.
    - b. BWCs shall not be used to record non-work-related activity



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### **USE OF SECURITY CAMERAS**

- c. BWCs shall not be used to record areas or activities such as administrative conferences, District restrooms, break rooms, or other activities not related to student investigation.
  - d. BWCs shall not be activated in places where persons have a reasonable expectation of privacy, such as locker rooms, dressing rooms, or restrooms.
  - e. BWCs shall not be used during District administrative investigations.
  - f. When possible, guards should avoid recording exposed areas of the body that could cause embarrassment or humiliation.
  - g. Student Health
    - i. Guards shall not record students during medical or psychological evaluations by a clinician or similar professional, or during treatment. When recording guards shall be careful to avoid recording persons other than the person of interest.
    - ii. Guards shall not record in the health office when the primary purpose is to provide counseling services unless responding to a radio call involving a person of interest who is still present.
  - h. Student and Witness Interviews
    - i. Student and witness interviews will generally not be recorded.
    - ii. BWCs shall not be used during Sex Crimes or Child Abuse investigations if interviewing potential victims.
  - i. Demonstrations
    - i. As a general policy, Campus Security should refrain from visual recordings or photographing peaceful demonstrations.
    - ii. When there is reason to believe that a planned event has the potential for disorderly activity, Supervisor should make the determination whether visual recording or photographing is appropriate.
    - iii. During demonstrations, guards will not activate their devices unless they witness disruptive or disorderly behavior occurring among the demonstrators and/or believe an arrest is likely, at which point they should begin recording.
  - j. Informal or Casual Encounters
    - i. Generally, guards should not record informal or casual encounters with staff members or the public. Guards should consider that recording people in some circumstances may inhibit sharing neighborhood information or developing strong ties between staff, students, parents, community members, and other guards.
6. Copying and Releasing Digital Evidence
- a. Except as specifically provided herein, digital evidence captured by BWC shall be treated as official records and handled pursuant to existing District policies and procedures and will only be released to anyone outside the district with the specific consent of the Superintendent or designee.
    - i. Recordings captured by BWC shall be released only in accordance with all applicable state and federal laws, including, but not limited to the Family



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### **USE OF SECURITY CAMERAS**

Educational Right to Privacy Act (“FERPA”) and the Oklahoma Open Records Act.

- ii. Recordings captures by BWC for documentation purposes by the Broken Arrow Public Schools will be released to Broken Arrow Public Schools administrators or their designee on request if the contents of the recordings are relevant to an investigation by Broken Arroe Public Schools employees into a school disciplinary matter. Copies of such recordings that are maintained in the custody of Broken Arrow Public Schools employees shall be treated as education records for the purposes of FERP and shall not be disclosed unless such disclosure would be allowable under applicable Broken Arrow Public Schools policies dealing with confidentiality of education.

#### Exclusions:

- 1. Cameras installed or utilized for criminal and civil investigations are subject to appropriate state and federal laws and are excluded from this policy;
- 2. Cameras used for instructional purposes are excluded from this policy; and
- 3. Cameras used for internal personal investigations are excluded from this policy.

#### Definitions:

<b>Word</b>	<b>Definition</b>
Security camera	Any item, system, camera, technology device, communications device, or process, used alone or in conjunction with a network, for the purpose of gathering, monitoring, recording or storing an image or images of District facilities and/or people in District facilities. Such devices may include, but are not limited to: analog and digital security cameras, close circuit television, web cameras, and computerized visual monitoring.
Security Camera data	Images captured by security cameras, which may be real-time or preserved for review at a later date.
Centralized Security System	Core infrastructure maintained by IT for purposes of storing and retrieving images from all security cameras deployed across the District. Infrastructure could include storage resources, such as disk drive arrays, as well as dedicated servers. Servers could perform activities such as storing images for later retrieval, retrieving images for investigation purposes, and maintaining logs of all access to stored security camera data.

Source: *Broken Arrow Board of Education policy adoption, June 21, 1993.*



## **SECTION IV: STUDENTS**

## **POLICY 4270**

### USE OF SECURITY CAMERAS

*Broken Arrow Board of Education policy revised, July 13, 2009.*

*Broken Arrow Board of Education policy revised, July 10, 2017.*

*Broken Arrow Board of Education policy revised, November 4, 2019.*

*Broken Arrow Board of Education policy revised, July 17, 2023.*