

POLICY TITLE: <b>RETENTION AND DISCLOSURE OF HARFORD COUNTY PUBLIC SCHOOLS ("HCPS") VIDEO RECORDS</b>		
ADOPTION/EFFECTIVE DATE: <b>November 22, 2004</b>	MOST RECENTLY AMENDED: <b>December 5, 2022</b>	MOST RECENTLY REAFFIRMED:
POLICY/PROCEDURE MANUAL SUMMARY CATEGORY: <b>Safety and Security</b>		

### I. Statement of Purpose

The Board recognizes that the use of surveillance cameras on school grounds and on school buses is an important tool in the management of student safety. Protecting the privacy of students is paramount and must be maintained in accordance with federal, state, and local laws and regulations.

### II. Definitions

A. *Authorized user* means HCPS staff members responsible for management and oversight of video recordings from HCPS surveillance cameras for legitimate safety and security reasons. These individuals include the following:

1. HCPS Office of Safety and Security (OSS) chief, including OSS staff designated by the chief and School Resource Officer (SRO).
2. HCPS Office of General Counsel (OGC) or OGC designee
3. HCPS Office of Transportation (OT) director and OT staff members authorized by the OT director to access and export footage of bus cameras
4. HCPS Office of Risk Management (ORM) or ORM designee
5. HCPS Office of Technology and Information Systems (OTIS) or OTIS designee, including third party technology vendors pursuant to contract.
6. HCPS Office of Student Support Services (OSSS) or OSSS designee
7. HCPS Office of Elementary and Secondary Education Services (OESES)
8. HCPS school principals or designee
9. HCPS school-based staff authorized by the principal to access and export HCPS video footage from school security cameras

- B. *Authorized viewer* means an individual who has been granted permission to view specified videos, as set forth as set forth in HCPS Form, Request to View HCPS Security Camera Video.
1. HCPS Form, Request to View HCPS Security Camera Video must be completed by the principal/designee, OSS, or the OT at the request of the following individuals who seek to view security camera footage:
    - a) Eligible students or parents/guardians, as appropriate.
    - b) Law enforcement.
    - c) Other individuals who are not HCPS administrators.
  2. Review and approval of HCPS Form, Request to View HCPS Security Camera Video is the joint responsibility of OGC, OSS, OESES, and OSSS.
  3. Once a HCPS Form, Request to View HCPS Security Camera Video is completed, all pertinent video will be saved for review.
  4. Video recordings are the property of the HCPS and shall not be released without the express approval of the OGC.
  5. All requests for viewing shall be granted or denied within 10 business days of the written request.
- C. *Chain of custody* means a written record of the date and time an authorized user exports footage for an authorized viewer from an HCPS security camera and the manner in which possession of the exported video file transfers from the original source to any subsequent locations and viewers.
- D. *Video server folder* means the location on a school or OT electronic file server to which security camera footage is exported in response to a request to view security camera footage of an alleged incident.

### III. Statement of Policy

1. The Board commits to the use of surveillance cameras on school grounds and on school buses in a manner that protects student, staff, and stakeholder safety while also balancing important privacy rights.
2. Review of surveillance camera footage shall be conducted only by Authorized users and, when eligible, Authorized viewers.
3. Viewings of surveillance camera footage by authorized viewers shall be documented with the Chain of Custody maintained securely by the OSS.

4. The OT shall ensure that any exported surveillance camera footage documented by the Chain of Custody is stored securely in a video server folder.
5. All Authorized users shall be trained on procedures relating to review and use of surveillance camera footage annually.
6. The Superintendent shall issue procedures required to implement this policy in accord with all applicable federal, state and local laws and regulations.

**Board Approval Acknowledged By:**



---

Sean W. Bulson, Ed.D.  
Superintendent

Policy Action Dates							
ACTION		DATE		ACTION		DATE	
Approved		11-22-04					
Amended Retitled		12-05-22					

Responsibility for Policy Maintenance & References	
LAST EDITOR/DRAFTER NAME: <b>Kimberly H. Neal, Esquire</b>	JOB POSITION OF LAST EDITOR/DRAFTER: <b>General Counsel</b>
PERSON RESPONSIBLE: <b>Ms. Julie Uehlein</b>	JOB POSITION OF PERSON RESPONSIBLE: <b>Supervisor of Risk Management</b>
DESIGNEE NAME:	JOB POSITION OF DESIGNEE:
POLICY NUMBER PRIOR TO NOVEMBER 1, 2005: POLICY NAME PRIOR TO DECEMBER 5, 2022: Video Surveillance	

### LEGAL REFERENCES<sup>1</sup>

References are set forth in the Procedure.

#### Related Sources:

U.S. Department of Education, FAQs on Photos and Videos under FERPA.

In a publication titled FAQs on Photos and Videos under FERPA (available at <https://studentprivacy.ed.gov/faq/faqs-photos-and-videos-under-ferpa>)

34 CFR §99.12{a}

<sup>1</sup> All references are to specific federal or Maryland statutes or regulations. References are provided for convenience and informational purposes only and are not to be considered as exhaustive or as precluding Harford County Public Schools from relying upon any other statutes or regulations in support of a policy.