



Policy: Surveillance Cameras (Video/Audio) on Head Start Transportation Vehicles

Community Action recognizes Head Start's continuing responsibility to maintain and improve the health, welfare, and safety of its staff and students on Head Start transportation vehicles. Surveillance cameras (Video and Audio) may be used to monitor student behavior on Head Start transportation vehicles.

Such equipment may also be used to monitor the performance of Head Start employees in the fulfillment of their duties on Head Start transportation vehicles in an appropriate, policy compliant and safe manner.

Staff remain subject to all Community Action Personnel Policies, including provisions related to performance evaluation, discipline, and dismissal and Head Start Policies and Procedures. Head Start shall develop procedures for notifying staff, students, parents, and others as necessary of the use of surveillance cameras (Audio and Visual) on transportation vehicles including signage and such other procedures as may be required by law.

SURVEILLANCE CAMERAS (VIDEO/AUDIO) ON TRANSPORTATION VEHICLES

Community Action Organization recognizes the value of electronic surveillance systems in monitoring activity on Head Start school buses in helping protect the health, welfare and safety of students and staff. The following procedures will be followed relative to the video monitoring system:

1. Education Records

- Community Action Head Start (CAHS) will comply with provisions of state and federal law regarding education records requirements including the Family Educational Rights and Privacy Act (FERPA) and the Individuals with Disabilities Education Act (IDEA) as applicable to CAHS use of video recordings.
- CAHS will include notice in the Head Start Monitoring and Surveillance Policy and Notice form and the Transportation Agreement Form that surveillance cameras (Audio and Video) will be used on Head Start transportation vehicles transporting students to and from Head Start sites. CAHS will include, as a part of its notice procedures, a copy of the CAHS surveillance camera policy and procedure to all parent(s), accompanied by a form to be signed by the parent(s) and returned to the Head Start Transportation Supervisor as an acknowledgment of being formally noticed, read, and understood.

2. Staff Records

- Video & Audio recordings considered for retention as part of the employee's personnel record regarding performance will be maintained confidentially in accordance with established personnel policies.
- Via receiving these Video and Audio Surveillance policies regarding Video and Audio Surveillance, staff should expect surveillance cameras to be always on and in use in Head Start school buses.

3. Storage/Security

- All video and Audio recordings will be strictly stored and secured to ensure confidentiality and only authorized secure access.
- Video and Audio recordings will be stored for only 10-calendar days after the initial recording. This retention may be longer if an authorized request is approved by the Director of Head Start to view a recording for appropriate business and safety reasons beyond the 10-calendar day mark. These recordings will then be erased.
- Video and Audio recordings held for review of student or staff incidents will be maintained in their original form pending resolution. The recording will then be either erased or retained as necessary.

4. Use

- Surveillance cameras (Video and Audio) will be used on all CAHS School buses when in use including transporting students to and from Head Start sites or other locations as authorized by Head Start.
- Surveillance equipment may also be used to monitor the performance of Head Start employees in the fulfillment of their duties on CAHS school buses.
- Staff and others are prohibited from tampering with or otherwise interfering with surveillance camera equipment. Failure to comply with this requirement will result in disciplinary action up to and including separation of employment.

5. Viewing Requests

- Requests for viewing video recordings will be limited to the Executive Director and Head Start Director, Transportation Supervisor as well as official government personnel whom CAHS has determined to have legitimate educational interests, parent(s), and others specified in state and federal law and accompanying regulations and only with the express approval of the request by the Executive Director and Head Start Director.
- Only the portion of the video and audio recording concerning a specific incident(s) will be made available for viewing if the request is approved.
- Approval/Denial for viewing will be made within five school days of receipt of request and communicated to the requesting individual(s).
- Video recordings will typically be made available for viewing within two business days of the request approval or as soon as is practicable.



6. Viewing

- Actual camera footage and audio viewing will be permitted only at secured Community Action Organization sites approved by the Executive Director and Director of Head Start or as otherwise required by law.
- A secured written log will be maintained of those who view video and audio recordings, including the date of viewing, the reason for viewing, the date of the recording, the school bus number, and the signature and title of the viewer(s).
- Video recordings remain the property of Community Action Organization and may not be reproduced without the express authorization of the Executive Director and Director of Head Start and, as such, only in accordance with applicable law.