

Community Action Team, Inc
Child & Family Development Programs
Surveillance Policy/Procedure

Policy: This policy authorizes Community Action Team (CAT) - Child & Family Development Programs (CFDP) Head Start/Prenatal to Kindergarten (OPK), the use of surveillance systems exclusively for internal program purposes. The purpose of these systems is to enhance the safety, security, and well-being of children, families, staff and community members and to strengthen the security of all of CFDP facilities owned by CAT.

The program leaders retain all rights to all recorded content. Surveillance footage is for program use only and will not be used for routine staff performance evaluations. Any surveillance footage that includes identifiable students from a School District or another program shall be treated as an education record under FERPA and shall not be disclosed or shared without prior authorization from the School District or other program, unless disclosure is required by law.

Procedure:

1. System Locations:

Surveillance systems may include, but may not be limited to, cameras with audio and video capability installed in the following areas:

- a. Classrooms
- b. Common spaces
- c. Outdoor spaces, including public spaces and learning spaces.

2. Privacy-Protected Areas

Cameras will **not** be installed in locations where privacy is expected, including:

- a. Private offices
- b. Bathrooms
- c. Lactation spaces
- d. Any other area where surveillance would violate privacy standards or legal requirements.

3. Notification Requirements

CAT - CFDP will provide annual written notification to staff and families regarding the use of surveillance systems. Signage will be posted at all locations.

4. Storage, Security and Retention

- a. Recordings will be stored securely with restricted access.
- b. Standard retained for 30 days.

- c. The Program Director or HR Director may authorize the retention beyond 30 days when related to a suspected and accompanied by a corresponding incident report.

5. Access to Recordings

Access is limited to:

- a. CFDP Administration
- b. Leadership Team
- c. CAT Human Resources when relevant to an investigation
- d. Law enforcement when legally required.

6. Staff Responsibilities

Staff must:

- a. Follow all safety and privacy procedures
- b. Report malfunctioning or damaged equipment
- c. Refrain from tampering with or disabling surveillance equipment
- d. Maintain confidentiality of recorded content.

7. Permitted Uses of Recordings

Recordings may be reviewed only for:

- a. Safety or security incidents
- b. Suspected policy violations
- c. Licensing or compliance investigations
- d. Legal requirements.

8. Prohibited Uses

The following uses of surveillance systems are strictly prohibited:

- a. Livestreaming classrooms to families or the public
- b. Sharing recordings with unauthorized individuals
- c. Using recordings for routine staff performance evaluations.