

# Red Bank Housing Authority Closed Circuit Television Monitoring and Recording Policy

## I. Purpose

The purpose of this policy is to regulate the use of closed-circuit television (CCTV) cameras to monitor and record public areas for the purposes of safety and security.

## II. Scope

This policy applies to all Red Bank Housing Authority personnel in the use of CCTV monitoring and recording.

## III. General Principles

1. The Red Bank Housing Authority is committed to enhancing the quality of life for its residents by integrating the best practices of security with state-of-the-art technology. A critical component of a comprehensive security plan using state-of-the-art technology is closed circuit television (CCTV).
2. The purpose of CCTV monitoring of public areas is to deter crime and to assist in protecting the safety and property at the Red Bank Housing Authority. Any diversion of security technologies and personnel for other purposes (e.g., CCTV monitoring of political or religious activities, or employee and/or residents) would undermine the acceptability of these resources for critical safety goals and is therefore prohibited by this policy.
3. Video monitoring for security purposes will be conducted in a professional, ethical, and legal manner. Personnel involved in video monitoring will be appropriately trained and continuously supervised in the responsible use of this technology. Violations of the Code of Procedures for video monitoring referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of the Red Bank Housing Authority.
4. Information obtained through video monitoring will be used exclusively for security and law enforcement purposes. Information obtained through video monitoring will only be released when authorized by the Executive Director according to the procedures established in this policy.
5. Video monitoring of public areas for security purposes will be conducted in a manner consistent with all existing Housing Authority policies, including the Non-Discrimination Policy, the Sexual Harassment Policy, and other relevant policies. The code of practice for video monitoring prohibits monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.)

6. Video monitoring of public areas for security purposes at the Housing Authority is limited to uses that do not violate the reasonable expectation to privacy as defined by law.
7. To maintain an informed resident community, the Red Bank Housing Authority will disseminate written materials annually describing the purpose and location of CCTV monitoring and the guidelines for its use.
8. Information obtained in violation of this policy may not be used in any proceeding against a resident or staff member.
9. All uses of video monitoring and recording must comply with this policy.

## IV. Responsibilities

1. The Executive Director is authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at the Housing Authority. The Executive Director has primary responsibility for disseminating the policy and assisting others in implementing the policy and procedures.
2. The Board of Commissioners has the responsibility to authorize all CCTV policy at the Housing Authority.
3. The Executive Director will monitor new developments in the relevant law and in security industry practices to ensure that CCTV monitoring at the Housing Authority is consistent with the highest standards and protections.
4. A CCTV Monitoring Committee will be established to assure that the Housing Authority adheres to established policy and procedure in the use of CCTV and to review camera locations and request for release of recorded video images.
  - a. The CCTV Monitoring Committee will consist of three members who will serve for a term of one year. The committee shall consist of:
    - The Chairperson of the Housing Authority.
    - 2 Commissioners selected by the Chairperson.
  - b. An individual may appeal an adverse decision by the CCTV Monitoring Committee by requesting an independent hearing. The hearing officer shall be as agreed upon by both parties.
  - c. The CCTV Monitoring Committee will review camera locations to ensure the perimeter of view of public cameras conforms to this policy.

The locations of temporary cameras to be used for special events will be reviewed by the CCTV Monitoring Committee for approval.

(Note: "Temporary cameras" does not include mobile video equipment or hidden surveillance cameras used for criminal investigations.)

The CCTV Monitoring Committee will review complaints regarding camera locations and determine whether the CCTV Monitoring Policy is being followed. The panel should weigh whether the potential increment in community security outweighs any likely infringement of individual privacy.

- d. The CCTV Monitoring Committee will review all requests received to release recorded video images obtained through CCTV monitoring. No releases of recorded video images will occur without authorization by the Executive Director and the CCTV Monitoring Committee. Excluded from review by the CCTV Monitoring Committee are releases of recorded video images directly related to a criminal investigation, arrest, or subpoena. The CCTV Monitoring Committee may also approve release of recorded video images only for legitimate purposes, such as to protect the Housing Authority and its' residents from harm or liability. Two affirmative votes are necessary to approve the release of recorded video images. Any release of recorded video images will be recorded on a written log.
- e. The CCTV Monitoring Committee will review this policy annually and recommend revisions if needed.
- f. **The CCTV Monitoring Committee will approve all requests for employee usage and monitoring of the cameras.**

## V. Procedures

1. All persons involved in video monitoring of public areas will perform their duties in accordance with the Code of Practice consistent with this policy developed by the Red Bank Housing Authority.
2. The Executive Director will assure that responsible and proper camera monitoring practices is continuous.
3. Th Executive Director will request approval, from the CCTV Monitoring Committee, of all employees needing access to the cameras
4. The Housing Authority will post signage at appropriate locations. Signage states: "This area is subject to Video Monitoring by the Red Bank Housing Authority."
5. Recorded video images will be stored in a secure location with access by authorized personnel only.
6. Camera operators should be trained in the technical, legal, and ethical parameters of appropriate camera use.
  - a. Camera operators will receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.
7. Camera operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by Non-Discrimination Policies and regulations.
8. Camera operators will not spot and continuously view people becoming intimate in public areas.

9. Camera operators will not view private rooms or areas through windows.
10. Access to CCTV Individuals identified on CCTV have the right to ask for access to footage about them. All requests will be dealt with under the Privacy Act.
11. Mobile video equipment may be used in criminal investigations. Mobile video equipment will only be used in non-criminal investigations in specific instances creating significant risk to public safety, security, and property as authorized in writing by the Executive Director and Monitoring Committee.

### **Examples of Video Monitoring and Recording of Public Areas**

Legitimate safety and security purposes include, but are not limited to the following:

- Protection of buildings and property
- Building perimeter, entrances and exits, special storage areas, RBHA Office, etc.
- Video Patrol of Public Areas
- Parking lots, public streets, and vehicle intersections, etc.
- Criminal Investigation
- Robbery, burglary, and theft surveillance
- Monitoring of pedestrian and vehicle traffic activity

