

VIDEO SURVEILLANCE SYSTEM POLICY AND PROCEDURE

1. **Introduction:**

The Alachua County Housing Authority (hereafter ACHA) is committed to enhancing the quality of life of its residents by integrating the best practices of safety and security with technology. The safety of ACHA residents, guests, business invitees and employees are of paramount importance. A critical component of a comprehensive safety plan is the utilization of video recording equipment. The surveillance of public areas, where there is no reasonable expectation of privacy, is intended to deter crime, aid in lease enforcement, and assist in protecting the safety and property of the ACHA community. However, these security measures, no matter how well intended, are not meant to imply or guarantee safety on ACHA properties.

2. **General Principles:**

The ACHA is authorized to select, coordinate, operate, manage, and/or monitor all video recording equipment pursuant to this policy. Video recording equipment footage and related information shall be used exclusively for crime deterrence and/or official business purposes, including but not limited to lease enforcement as determined or approved by the Executive Director or his/her designee, in consultation with the General Counsel. The video recording equipment shall be used in a professional and ethical manner in accordance with ACHA policy and local, state, and federal laws and regulations. All ACHA personnel accessing video recording equipment surveillance or obtaining footage thereof are responsible for complying with this policy in their respective operations.

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3. **Definitions:** For purposes of this policy, capitalized terms shall have the following definitions, unless another definition is explicitly used:

Applicable Laws and Regulations – This policy is adopted in accordance with, and shall be interpreted to comply with, all relevant law and regulation, as may be amended from time to time, including but not limited to:

- A. The Federal Privacy Act (5 U.S.C. § 552a) and its implementing regulation for the U.S. Department of Housing and Urban Development, and other federally assisted housing programs (24 C.F.R. § 5.212); and
- B. The Public Records laws of the State of Florida, (Chapter 119, Florida Statutes).

To the extent that this policy is silent on, or conflicts with, any provision of relevant law or regulations, the law or regulations shall govern. To the extent that there is any conflict of laws, the General Counsel will determine which law shall be applied.

Video Surveillance System (VSS) – any video surveillance cameras located on ACHA property.

Recorded – stored in such a format as to enable actual production of the recording as of the date any request for such production is processed. Specifically, this term shall not include any recording which is deleted, destroyed, or overwritten due to passage of time, storage limitations, or other lawful reason.

Requestor – any person, whether a natural person or legal entity, who is not affiliated with an instrumentality of ACHA, who requests that ACHA provide Surveillance Footage, subject to any statutory exemptions.

ACHA, a political subdivision of the State of Florida.

ACHA Camera – any Camera that is owned by ACHA and for which ACHA maintains all Recorded Surveillance Footage.

Surveillance Footage – any video or image captured by any Camera.

Vendor – any person, whether a natural person or legal entity, other than an instrumentality of ACHA, who is engaged in the business of installing, owning, operating, monitoring and/or maintaining video surveillance systems.

Vendor Camera – any Camera that is owned and maintained by any Vendor, pursuant to a written agreement with ACHA, and from which ACHA does not generally store, maintain, or preserve any Surveillance Footage.

4. Purpose & Scope:

This policy applies to all ACHA personnel in the use of security cameras and their video monitoring and recording systems. VSS cameras are or may be installed in situations and places where the security and safety of either property or persons would be enhanced. To ensure the protection of individual privacy rights in accordance with the ACHA's core values and state and federal laws, this policy is adopted to formalize procedures for the installation of surveillance equipment and the handling, viewing, retention, dissemination, and destruction of Recorded content. The existence of this policy does not imply or guarantee that the VSS will be live monitored by ACHA personnel in real time twenty-four (24) hours a day, seven (7) days a week.

ACHA and Vendor Cameras will be limited to uses that do not violate the reasonable expectation of privacy as defined by law. Where appropriate, the cameras may be placed outside buildings and inside building doorways, hallways, lobbies, community rooms and elevators. The functions of all cameras fall into three main categories:

- A. **Personal Safety:** Where the primary intent is to monitor and/or capture Recorded content and store it on a secure device so that it may aid in the investigation of any crimes against the person or deter a potential threat thereof.
- B. **Property Protection:** Where the primary intent is monitor and/or capture Recorded content and store it on a secure device so that it may aid in the investigation of any crimes against property or deter a potential threat thereof.
- C. **Extended Responsibility:** Other official uses, including but not necessarily limited to lease enforcement as determined or approved by the Executive Director or his/her designee, in consultation with the General Counsel.

5. Appropriate Use:

All VSS Recorded content on ACHA Cameras are the sole property of the ACHA. No footage from ACHA Cameras shall be shown, disclosed, or disseminated to the media, public, internet or any other unauthorized person(s) without prior written approval from the Executive Director or his/her designee, in consultation with the General Counsel.

All information and/or observations made available through the VSS shall only be used to deter crime, aid in lease enforcement, assist in protecting the safety and property of the ACHA community or other official purposes as determined by the Executive Director or his/her designee, in consultation with the General Counsel.

No Recorded image shall be altered in any manner. The only narrow exception allows for faces of non-participants in an incident to be blurred or otherwise obscured for privacy reasons in the event a video or image is officially released to the media, as allowed by Applicable Laws and Regulations.

The VSS is not configured to detect or record audio.

6. Responsibilities and Authority:

Responsibility for oversight of the VSS and associated policies, standards and practices is delegated by the Executive Director or his/her designee, in consultation with the General Counsel.

These responsibilities include:

- A. Procurement, deployment, and use of the camera systems.
- B. Coordinating evaluation and analysis of the most effective placement of cameras.
- C. Authorizing the placement of all cameras.
- D. Authorizing the purchase of any new camera systems.
- E. Reviewing existing camera systems and installations and providing feedback and recommending required changes to bring them into compliance with this policy.
- F. Creating and approving ACHA standards and procedures for cameras and their use.
- G. Authorizing appropriate signage for posting in conspicuous places to notify the public concerning the cameras and their use.

7. VSS Monitoring and Review:

1. ACHA personnel may monitor and review live camera feeds from ACHA or Vendor Cameras and bookmark footage as needed to enhance public safety.
2. The Executive Director may allow select law enforcement personnel to review live camera feeds from ACHA or Vendor Cameras, bookmark footage and access and/or record and/or download archived footage to aid in investigations or enhance public safety.
3. ACHA personnel shall conduct directed live monitoring of ACHA or Vendor Cameras based on observed and/or reported suspicious activity and/or lease violations, not individual characteristics. Direct monitoring of individuals based solely on characteristics of race, gender, ethnicity, sexual orientation, disability, or other protected classification is strictly prohibited.

8. Use of Cameras for Criminal Investigations:

In addition to the fixed VSS cameras, the use of mobile or hidden ACHA or Vendor Cameras may also be used in criminal investigations by the ACHA or other local, state, or federal law enforcement agencies. Covert ACHA or Vendor Cameras may also be used for non-criminal investigations of specific instances, which may pose a significant risk to public safety, security, and property as authorized by the Executive Director or his/her designee, in consultation with the General Counsel.

9. Video Capture Requests:

VSS Recorded content shall be kept on the ACHA secure server until the footage is eventually recorded over as the VSS is configured, and pursuant to Applicable Laws and Regulations.

- A. All internal requests for Surveillance Footage within the ACHA must be submitted in writing or electronically to the Executive Director or his/her designee. ACHA personnel are reminded that Surveillance Footage becomes evidence upon download to appropriate recording devices and need to adhere to established chain of custody protocol in subsequent handling.
- C. No Surveillance Footage shall be authorized for release that may compromise a potential or ongoing criminal investigation or is otherwise detrimental toward the interest of public safety as determined by the Executive Director or his/her designee, in consultation with the General Counsel.
- D. All requests for Surveillance Footage by a Requestor, subject to Applicable Laws and Regulations, shall contain the following information:
 - 1. Location to include specific information about address, hallway, floor, exit or elevator as applicable.
 - 2. Date(s) of interest.
 - 3. Time period(s) of interest.
 - 4. Detailed reason(s) for interest.

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10. Exceptions:

This policy does not address the use of privately owned cameras by individuals or Webcams for general use by or within the ACHA. This policy also does not apply to the use of video equipment for the recording of public performances and/or events for educational purposes.

Approved under Resolution # _____ on _____