



## SECURITY CAMERA POLICY & PROCEDURES

### 1. Purpose

The purpose of this policy is to establish City of Woodburn guidelines for use of security cameras and remote monitoring systems in City buildings and/or on City property in a way that enhances security while respecting the privacy expectations of employees and members of the Woodburn community.

This policy shall not apply to the use of cameras for reasons unrelated to surveillance activity or video conferencing. Nor shall this policy apply to cameras used by law enforcement in the following manners: covert operations for the purpose of criminal surveillance; or mobile cameras used in, on, or about law enforcement vehicles; or body-worn or otherwise portable cameras used during the course of investigations or normal law enforcement functions.

### 2. Scope

This policy covers all employees, including seasonal, temporary, volunteers, and interns, and visitors of City facilities.

### 3. Definitions:

**Security Camera** means a fixed camera used for recording areas for the purposes of enhancing public safety and security, monitoring areas, equipment or other property to discourage theft and other criminal activities, and for preventing, investigating and resolving incidents that take place on City property.

**Video Conference Camera:** Connected to a personal computer. Used to transfer images of video conference participant. Not a continuously monitored camera. Activated by the user.

**Transit Video Camera System:** Video camera system installed in transit vehicles. These systems are self-contained and are not connected to the City's network.

### 4. Policy

It is City of Woodburn's policy that the City is committed to protecting public property and establishing and maintaining workplaces and public areas that are secure and safe for both employees and residents. To enhance this commitment, City of Woodburn

allows departments to install and utilize security cameras in public areas.

The existence of this policy does not imply or guarantee that security cameras will be monitored in real time continuously or otherwise.

## **5. Camera Placement and Notification**

Security cameras shall only be installed pursuant to the request of a City department director, with final approval by the City Administrator.

The installation or removal of a department's security camera must be coordinated with Facilities Management, Risk Management, and Information Technology. Departments shall not install cameras for security purposes on their own.

Placement of cameras shall only be considered for the security and safety of employees and the public, security of City facilities and property, or for legally mandated reasons. Cameras may be installed in outdoor and indoor locations that are deemed public areas. Examples include public common areas such as parking lots, entrances, seating areas, service desks, transit vehicles, and areas prone to theft or misconduct, or areas where money is stored or handled.

Cameras will not be installed in areas where individuals have a reasonable expectation of privacy such as restrooms or private offices. If needed, electronic shielding will be placed in the security camera so that the camera cannot be used to look into or upon private areas on City property or on adjacent properties.

Camera placement must also take into consideration any confidential material that could be visible.

Signs will be posted at the entrances to City buildings or other public facilities informing the public and staff that security cameras are in use.

Video conference cameras may be installed by departments in coordination with Information Technology (IT). Departments are not required to coordinate videoconference camera installation with Risk Management and Facilities Management.

## **6. Responsibilities**

The City Administrator is responsible for overseeing the installation, maintenance, and utilization of security cameras on City property, along with implementation of associated standards and procedures. Pursuant to this policy, the City Administrator may delegate certain responsibilities to other City employees.

With the exception of transit video camera system recordings, it shall be the IT Manager's responsibility to maintain all video recordings until the applicable statute of limitations has expired. The Transit Manager shall maintain transit video camera system video

recordings.

Expense and maintenance of the camera shall be the responsibility of the department requesting installation of the camera.

The IT Manager is responsible for preparing the annual budget for the costs of maintenance, server storage, and future equipment replacements, and for the allocation of those costs to the benefited departments. To maintain uniformity, purchase, installation, and maintenance of camera equipment will be completed by the IT Department. All security camera equipment must comply with current City standards. New surveillance cameras must connect to the City's centralized surveillance system. Live view of the cameras will be checked weekly by the IT Department to make sure cameras are working properly, the image quality meets the City's needs, and video storage periods meet or exceed the State of Oregon's record retention standards. Any cameras found not meeting these standards will be recommended for repair or replacement. IT Manager shall inform the Risk Manager when a camera is found to be not working properly.

Transit Video Camera Systems may be purchased, installed, and maintained by the Transit Manager. The Transit Manager is not required to coordinate these activities with the IT Department, Risk Management, or Facilities Management.

## **7. Access and Monitoring**

The City Administrator, Chief of Police, Risk Manager, HR Director and other authorized personnel may monitor and review security camera live feeds and recordings as needed and appropriate to support investigations and to enhance public safety. Department Directors may monitor and review security camera live feeds only of their work areas for purposes of public and employee safety. Other employees with a need to access select security cameras will have that access granted by the City Administrator. IT Department personnel will monitor and review security camera live feeds and recording as needed to troubleshoot and support the camera system, software, and staff. Video footage will be stored on servers accorded appropriate computer security with access by authorized personnel only.

Access to the archived footage for investigating violations of HR Rules is restricted to designated staff, with approval from the HR Director. Access to the archived footage for investigating potential criminal activity is restricted to designated staff, with approval from the City Administrator or Chief of Police.

Monitoring shall be based on suspicious behavior and/or reasonable belief about the presence or risk of security or public safety issues, potential policy violations or potential criminal activity.

## **7. Prohibited Conduct**

No security cameras, videoconference cameras, or other monitoring devices shall be installed or located upon City property without being properly approved and meeting the standards of this policy. Tampering with or causing damage to City cameras is also prohibited.

Cameras are not installed, nor will they be used for the purposes of routinely monitoring staff. However, the City may utilize routine security camera recordings in support of disciplinary proceedings against employees, or in a civil suit or other proceeding involving person(s) whose activities are shown on the recording and relate to the proceeding.

Confidentiality, privacy, and security issues prohibit the general public from viewing security camera footage that contains personally identifying information about employees and citizens, or information that reveals or identifies City security measures. If the City receives a request from the general public to inspect security camera footage, the City will respond according to Oregon public records laws and City policy.

A breach of this policy may result in disciplinary action up to and including dismissal. Any employee who becomes aware of any damage to or tampering with a City security camera, unauthorized disclosure of a video recording, and/or a potential privacy breach has a responsibility to immediately inform the City Administrator or HR Director.

## **8. Data and Storage**

Security camera footage is the property of the City and will be securely retained by IT for at least 30 days and then erased, unless retained as part of a criminal or civil investigation or court proceeding, or as approved by the City Administrator.

If an incident occurs, footage of the incident shall be retained in a viewable format as follows: (a) digital archives used as evidence must be retained until a case reaches final disposition; or (b) digital archives used for internal investigations must be retained until the investigation ends. Staff shall consult with the City Attorney's Office if there are any questions regarding the applicable retention period in a particular case. All other archives will be reviewed monthly and properly discarded consistent with this policy if the archives do not meet the criteria described in this section.

## **9. References**

Oregon Administrative Rules Chapter 166, Division 200 City general records retention schedule

Oregon Revised Code Chapter 192 Records, public reports and meetings

City of Woodburn HR Rules

## **10. Review of Policy and Procedures**

This policy will be reviewed every three years or as state and federal regulations are

revised and necessitate a change in the policy or procedures.

Adopted: November 2018

Revised: April 2024