

Falmouth Housing Authority Security Camera Policy

Purpose

The Falmouth Housing Authority ("the **FHA**") strives to maintain a safe and secure environment for its users, staff, and property while protecting individual privacy rights in all public buildings. In pursuit of this objective, security cameras are placed in selected areas of the Authority's buildings to discourage criminal activity and violations of Authority policy, and to enhance the ability to identify and apprehend offenders.

Applicability

This policy shall apply to all buildings and surrounding properties own/managed by the **FHA**. The **FHA** will notify the Union, before installation and with enough notice to bargain the impact of, the placement location any new cameras or any new buildings and camera locations where the **FHA** plans to put new cameras.

Privacy

Cameras may be placed in indoor and outdoor areas where individuals lack a reasonable expectation of privacy, such as entrances, delivery areas, parking lots, public seating areas, and service desks. Cameras will not be placed in areas where individuals have a reasonable expectation of privacy, such as restrooms or offices. Cameras will not be used for live monitoring of employees.

Public Notice

Signs are posted at all public building entrances notifying the public and staff that security cameras are in use. Security cameras are not continuously monitored both Authority Staff and members of the public should take appropriate precautions for their safety and the security of their personal property. The **FHA** is not responsible for loss of property or personal injury and assumes no duty by placing these security cameras.

Data Storage and Access

Cameras record activities in real time. No audible communication shall be monitored or recorded by the security cameras. The length of time that recordings are stored varies depending on how much is recorded, but recordings are typically deleted after 30 days. When an incident occurs that may affect the safety and security of a Town building and its occupants, or may be required for potential legal proceedings, the Town reserves the right to save recordings for as long as it deems necessary.

The recorders and recorded data are located in a limited access, controlled area. Only the **FHA** Director is authorized to access live and recorded footage in pursuit of incidents of criminal activity or violations of **FHA** policy. Other staff members may be given authorization to access or

view footage on a limited basis. Information technology staff and facilities maintenance staff may also use security cameras to aid in the operation of **FHA** business and ensure proper operation of the system, with reasonable notice to staff.

Authorized individuals may use recorded data to identify those responsible for **FHA** policy violations, criminal activity on **FHA** property, or actions considered unreasonable and disruptive to normal Authority operations. Authorized individuals may also request law enforcement review a still image or selected portion of recorded data for assessing the security risk of a specific individual or for investigation of a crime on **FHA** property.

Recorded data may be shared with **FHA** staff to identify those suspended from Authority property and to maintain a safe, secure, and policy-compliant environment. Still images may remain posted in staff areas for the duration of the suspension period.

The **FHA** acknowledges that the purpose of Security Cameras is not to monitor employees in real time live feed and are not to be used for disciplinary purposes unless in the course of footage review in other investigations employee misconduct is identified. The **FHA** will identify to the Union reasons of the footage review's original complaint. The **FHA** then may utilize data collected through the cameras as part of a disciplinary investigation of its employees, or when the **FHA** has a documented complaint of employee misconduct; and the **FHA** further agrees that it may review security camera footage as needed to support investigations and to enhance public safety, Law Enforcement investigation related purposes, and property damage or loss. Footage will be kept on file for up to 30 days for investigation purposes and follow the protocols of the Commonwealth for retention of records. Once an investigation is completed, the Union will be informed of the exact reason that the footage has been reviewed.

Employees are **PROHIBITED** from removing, damaging, altering or attempting to alter, disabling and/or attempting to disable any camera in a **FHA** owned building or structure.

Law Enforcement Access

All requests for the viewing of live or recorded images by law enforcement must be presented to the **FHA** Director. Recorded data will be afforded the level of confidentiality and protection consistent with the **FHA's** obligations under Massachusetts' Public Record laws.

Access is also allowed by law enforcement when pursuant to a subpoena, court order, or when otherwise required by law. The **FHA** reserves the right to consult legal counsel in matters involving warrants or subpoenas seeking access to security footage. Upon approval by the **FHA** Director recorded images may be shared voluntarily with law enforcement, unless the images are protected by Massachusetts law.

In the event of an emergency situation on a **FHA** property covered by security cameras, Police, or other appropriate public safety/law enforcement authorities, will be granted temporary access to the live camera feed in order to coordinate the emergency response. This access must be terminated once the situation is under control and the immediate danger to public safety has passed.

Information obtained from camera footage will be used exclusively for the purposes set forth in this policy. The FHA Director may authorize the review or release of camera footage for legitimate purposes, including the protection of FHA tenants, patrons, staff, and property, and to protect the FHA from lawsuits.

Request from the General Public

Members of the general public requesting to inspect security camera footage will be advised to file a police report or public records request, subject to applicable exemptions and protections.

Unauthorized Access and/or Disclosure

All FHA staff will be made aware of their obligations under federal and state law regarding protection of privacy. Failure to comply with this policy may result in disciplinary action. Any FHA employee who becomes aware of any unauthorized disclosure of a video record and/or a potential privacy breach has a responsibility to immediately inform the FHA Director of the breach.

Disclaimer

The FHA disclaims any liability for use of the video data in accordance with the terms of this policy, given that the FHA is a public entity, and the security cameras shall be limited to those areas where patrons and/or staff have no reasonable expectation of privacy.

This Policy supersedes and overrides any other existing policy applicable to the use and operation of security cameras on FHA property.

John Robert 3/1/25
For the Union, Council 93, Staff Representative

[Signature] 3/14/2025
For FHA

James M. Munde 3-10-25
President, Local 1636

By Resolution 2025-073

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Effective 3/5/2025