

## **DRAFT Security Cameras in RAILS Policy**

RAILS employs several in-building/on-site security cameras in various locations needed to provide peace of mind to members and staff by discouraging violations of the standards of Conduct, assisting staff in investigating the occurrence of any violation, and, when necessary, providing law enforcement assistance in prosecuting criminal activity. The purpose of this policy is to establish guidelines for the placement and use of video security cameras, as well as the access and retrieval of recorded video images from a RAILS location.

### ***Purpose, Use, and Areas of Security***

Several cameras are installed at various indoor and outdoor RAILS locations as needed. Cameras are positioned to provide security footage at optimum locations where potential property loss or security issues might occur. Each camera operates independently and starts recording on motion detect (without sound), so maximum DVR recording length may vary from position to position. Also, color footage varies as to light intensity. Camera activity will not be randomly checked unless there are substantiated questions of illegal/objectionable activity by a member or staff or in the case of camera maintenance/repair. Access to the archived footage in pursuit of documented incidents of criminal activity or violation of the standards of Conduct is restricted to designated staff: Executive and Associate Executive Director, Delivery and Facilities ~~Facilities and Delivery~~, Director or their designate, Board President and/or System Attorney. Access is also allowed by police pursuant to a subpoena, court order, or when otherwise required by law. The designated staff, as described above, may have access to real-time monitors. Images will be viewed on desktop monitors by designated staff only, as well as on designated staff's portable devices, when applicable.

### ***Retention, Disposal and Destruction of Recordings***

Camera footage is stored digitally on secure DVRs. Typically, all security cameras start recording on motion-sense. The standard recording retention period is 30 days, ~~with automatic recording over themselves at the start of the 30-day period~~. Still, individual camera recording time varies greatly depending upon motion/activity in the camera viewable area (see Additional Guidelines). Copies of recordings for specific incidents instances may be made at the request of law enforcement or others (with the permission of authorized staff) ~~authorization of restricted staff~~ and placed on thumb drives or on recordable DVDs to be supplied to the requesting party. In no instance will a video security file be emailed to any other party unless required ~~to~~ by law or court action.

### ***Notice of Security***

Clearly visible signs denoting "security cameras on premise" will be posted at each entrance, informing the public that digital security cameras (not surveillance cameras) are in use. RAILS will maintain an accurate diagram of camera locations.

### ***Access to Security Footage, ~~Incident Reports, and Charges for Access/Copies~~***

Any/All requests to view or cut/edit footage ~~by law enforcement, insurance companies, or persons~~ will be referred to the Facilities and Delivery Director. As a normal course of events, upon evidence of a crime and at the request of law enforcement, video footage/stills will be provided ~~at no cost~~. The ~~Delivery and Facilities Director~~ ~~Facilities and Delivery Director~~ will review all other requests in consultation with the Executive Director. The general public will not be allowed to view live security camera footage but may request copies of footage pursuant to FOIA for validity. Charges for access, staff time in location/editing/duplication will be charged to the inquiring entity according to their request. All requests for security camera footage will be documented/logged through the completion of a RAILS incident report that will be filed and kept as an accurate record of use in accordance with the Illinois Archives accepted retention schedule.

### ***Additional Guidelines***

- Because security cameras are not constantly monitored, staff and the public should take appropriate precautions for their safety and the security of personal property. RAILS is not responsible for loss of property or personal injury.
- Cameras may be installed in public spaces where individuals lack a reasonable expectation of privacy. Examples include common areas such as entrances, hallways, stairways, delivery areas, and parking lots.
- Cameras are purposely installed to only focus on system property - internal building and external property. Some portions of public roadways and sidewalks may be in partial view.
- Cameras will not be installed in areas where individuals have a reasonable expectation of privacy, such as in restrooms.
- Cameras have not and will not be ~~used installed~~ to monitor staff performance.
- Images will typically be stored for an average period of 30 days. As new images are recorded, the oldest images will be automatically deleted. The length of time varies depending on the camera's memory, recording length, and site activity.
- Staff and member safety is the priority in any threatening situation. The protection of System property is of secondary importance.

### ***FOIA Requests Regarding Camera Footage/Stills/Enhanced Photos***

Security camera footage, like most other administrative documents in RAILS, can be considered public materials and are therefore accessible through a specific incident FOIA request.

However, the RAILS FOIA Officer can deny a specific request if it can be proven that the request violates a federal or Illinois state law or regulation such as under 7(1)a - unwarranted invasion of personal privacy 5 ILCS 140/7(1){a} or the Family Educational Rights & Privacy Act {FERPA}.

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