

Charlottesville Redevelopment and Housing Authority

Policy on Security Cameras and Recording of Public Areas for Safety and Security Purposes

Purpose: The purpose of this policy is to regulate the use of security cameras to observe and record public areas for the purposes of safety and security. The safety of Charlottesville Redevelopment and Housing Authority (CRHA) residents and employees is of paramount importance. A critical component of a comprehensive safety plan is the utilization of a Video Surveillance System (VSS). The surveillance of public areas is intended to deter crime and assist in protecting the safety and property of the CRHA community.

Scope: This policy applies to all security cameras on CRHA owned and/or managed properties. Generally, these cameras will be mounted in set locations. However, if there is concern for property damage or personal security, cameras may also be temporarily placed to monitor the specific area of concern. To ensure personal privacy, the cameras will be located and record data only in areas that are considered public. These cameras are not continuously monitored but are intended to be used in investigations of alleged criminal activity. The security cameras may be monitored by the security firm while they are on site. If you have questions regarding the cameras or the use of recorded information, please contact the Public Housing Manager at 434-326-4672.

General Principles CRHA has deemed the following as the goal of the VSS:

- CRHA is committed to enhancing the quality of life of residents in our public housing communities. A critical component of a comprehensive security plan is utilizing technology for security cameras.
- The purpose of camera surveillance of public areas is to deter crime and to assist the police in protecting the safety and property of the community.
- Video surveillance for security purposes will be conducted in a professional, ethical and legal manner.
- CRHA will work with PHAR to create a committee at each site to advise on placement of cameras and will hold at least one meeting on each site to solicit feedback on camera placement and answer questions.
 - (Security firm, police officer, 4 residents, 1 CRHA staff member)
- Information obtained through video surveillance will only be released when authorized by the Community Review Board and Executive Director.
 - Each CRHA community with a VSS will have a Community Review Board which consist of 1 third party representative (TBD) (LAJC, human rights commission, PHAR selects third party 1 resident that lives in the community (picked by Board through application process) and 1 CRHA staff member (legal counsel). Option 2: (LAJC picks rep; CRHA picks rep and both individuals work together to pick a third member)
 - The Community Review Board will meet only when Video Capture Request are submitted. The Community Review Board will have 30 days to render a decision. If a decision is not rendered within 30 days by the Community Review Board the Executive Director can proceed with rendering a decision.
- The Executive Director may approve the release of video footage when there is an active threat to the community without prior approval from the CRB.

- Surveillance of public areas for security purposes will be conducted in a manner consistent with all existing CRHA policies, including the Non-Discrimination Policy and Sexual Harassment Policy. The Code of Procedures for video surveillance prohibits surveillance based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.).

Responsibilities: The CRHA is authorized to oversee and coordinate the use of camera surveillance for safety and security purposes on CRHA properties in conjunction with the Community Review Board. The Community Review Board will review all Video Capture Request (VCR) forms and then submit a recommendation to the Executive Director. The Executive Director will make the final decision whether to approve or deny the request. If the Executive Director's decision conflicts with the CRB decision the request will be submitted to the CRHA Board of Commissioners (BOC) for a final decision. (Oberg guidance) The CRHA will accept input and recommendations on camera locations, and also review camera locations to ensure the perimeter of view of fixed location cameras conforms to this policy. The CRHA personnel and the Community Review Board will review complaints regarding camera locations and determine whether a potential increase in community security outweighs any likely infringement of individual privacy.

The CRHA Executive Director will review all VCR received to release recordings obtained through camera surveillance. No camera recordings will be released without authorization by the CRHA Executive Director.

Code of Procedures The guidelines for investigations, complaints, and/or alleged rule of violations:

- All Camera Control Operators and reviewers involved in video surveillance of public areas will perform their duties in accordance with this policy.
- The view of residential housing units must not violate the resident's "reasonable expectation of privacy".
- Video footage will be stored in a secure location with access by authorized personnel only. The CRHA will provide the Community Review Panel a camera review log for each community every 30 days.
- Camera control operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by CRHA's Non-Discrimination Policy.
- No 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 CRHA Executive Director or General Counsel

Video Capture Requests (VCR) Residents and law enforcement who are in need of VSS recording are required to submit a request. To submit a VCR form, please follow the steps below:

1. Submit a Video Capture Request form by mail or email, to the CRHA Executive Director.
2. Resident Video Capture Request will be submitted to the Community Review Board for approval.
3. After the Community Review Board has made a recommendation the request will then be sent to the Executive Director for final approval.

***NOTE:** VSS recordings will be kept on the CRHA secure server for (45) days.*

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