

*Rite of Passage
Policy and Procedure*

Policy Number:	500.520
Policy Name:	Camera & Video Surveillance Policy
Program Type:	All

Policy:

Rite of Passage (ROP) is committed to integrating the best practices of safety and security with technology. A critical component of a comprehensive security plan is the utilization of a security and safety camera system. This policy addresses ROP's safety and security needs while respecting and preserving individual privacy. To ensure the protection of individual privacy rights in accordance with ROP'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 surveillance records. The purpose of this policy is to regulate the use of camera systems used to observe and record ROP programs for the purposes of safety, security, and incident follow up.

Rite of Passage operates youth programs and schools. As a result, the youth involved are protected by all confidentiality laws related to medical treatment, legal proceedings, education, and health care. Saving, storing, and releasing video to outside agencies is conducted in accordance with this policy and procedure.

I. General Principles

Information obtained from the cameras shall be used for safety, security, and incident follow up purposes. Information must be handled with an appropriate level of security to protect against unauthorized access, alteration, or disclosure.

All appropriate measures must be taken to protect an individual's right to privacy and hold ROP information securely through its creation, storage, transmission, use, and deletion.

II. Camera Installation

ROP Program Directors or Program Managers wishing to install video surveillance equipment shall submit a written request to their appropriate Regional Executive Director describing the proposed location of surveillance devices, justifying the proposed installation, and identifying the funding source or sources for purchase and ongoing maintenance.

The Regional Executive Director will review the request and recommend it to the Director of IT, if appropriate.

The Director of IT will review all proposals from Regional Executive Directors and consult with the Chief Administrative Officer (CAO), as needed.

The CAO will be responsible for reviewing and approving or denying all proposals for security camera equipment recommended by the Director of IT.

ROP's IT Department shall oversee the installation of all approved security camera systems.

III. Placement of Cameras

As permitted by placing agencies, all sites shall have cameras in indoor and outdoor high-traffic and common areas. No site shall install cameras in bathrooms, showers, or sleeping rooms. This will be achieved by existing camera systems or, for sites that have no existing camera system, a camera system approved by IT.

IV. Audio Recording

Sound recording shall be prohibited unless required by a placing agency contractual agreement. Any existing camera system with sound capabilities shall disable such capabilities.

V. Stored and Saved Video and Still Images

All video storage shall be onsite. If a site does not have the capability for onsite storage, then upon approval by IT storage may occur in the cloud. Video shall be stored for a minimum of 30 days and a maximum of 45 days. If a significant incident occurs and is reported, supporting video clips shall be stored pursuant to legal requirements for evidentiary preservation. Remote or offsite access shall be limited and must be approved by the Director of Information Technology and the Chief Administrative Officer.

Access to recorded video shall be limited to Program Directors, Program Managers, Regional Compliance Directors and Executive Directors unless approval is sought and granted by Corporate Human Resources Director (HRD) and CAO. Unless required by contract or regulation, copies of video clips or access to video storage by non-ROP sources is strictly prohibited without court order or approval by the HRD or CAO. Following the approval to release video, but prior to the release, an ROP video image release form and acknowledgement must be completed and signed.


VI. Live video

Each site that has a position available to be dedicated to view live video and immediately report concerns to operational staff will be granted access to live video upon the request of Program Director and Program Manager and approval of the CAO and HRD. This access can include, but is not limited to, the following positions: control center, reception, and night shift supervisor. Program Managers, Program Directors, and Executive Directors may also have access to live video. All access will be via an application or browser on their designated work computer, tablet or phone if the camera system permits or through a dedicated workstation on the camera system.

VII. Staff Access

Staff access to see video shall be prohibited by anyone at the site. All requests by staff to see stored video shall be granted by the Regional Executive Director, CAO, or CAO. Staff and students shall sign an acknowledgment that recording is occurring and release ROP, its successors and assigns from liability for such recording.

Policy Version History and Reference Information

Date & Version #	Details	Approved By:
10/25/19 v1	Policy created	Matt Gosting
02/11/21	Policy revised to include release form. Policy 100.111 eliminated due to duplication.	Lawrence Howell
11/30/22 v3	Policy updated regarding video access	

Reference Type (Accreditation, regulation, etc...)	Number, Section, ...
ORR Guidelines	4.4.2