

BOSTON HOUSING AUTHORITY **POLICE DEPARTMENT**

Video Surveillance System Policy

1. Introduction:

The Boston Housing Authority (BHA) is committed to enhancing the quality of life of its residents by integrating the best practices of safety and security with technology. The safety of BHA 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 BHA community.

2. General Principles:

The Boston Housing Authority Police Department (BHAPD) is authorized to select, coordinate, operate, manage, and monitor all VSS pursuant to this policy. VSS footage and related information shall be used exclusively for law enforcement and /or official business purposes as determined or approved by the Chief of Police or the General Counsel or designee. The VSS shall be used in a professional and ethical manner in accordance with BHA policy and local, state, and federal laws and regulations. All personnel using camera surveillance or obtaining footage thereof are responsible for complying with this policy in their respective operations.

3. Purpose & Scope:

This policy applies to all personnel and departments in the use of security cameras and their video monitoring and recording systems. VSS cameras are or may be installed in situations and places where the security and safety of either property or persons would be enhanced. To ensure the protection of individual privacy rights in accordance with the Authority'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 existence of this policy does not imply or guarantee that the VSS will be live monitored by personnel in real time 24 hours a day, seven days a week.

Cameras will be limited to uses that do not violate the reasonable expectation of privacy as determined by applicable state and federal law. Where appropriate, the cameras may be placed outside buildings and inside building doorways, hallways, lobbies and elevators. The functions of all cameras fall into three main categories:

- A. **Personal Safety:** Where the primary intent is to monitor and/or capture video and store it on a secure device so that it may aid in the investigation of any crimes against the person or deter a potential threat thereof.
- B. **Property Protection:** Where the primary intent is to monitor and/or capture video and store it on a secure device so that it may aid in the investigation of any crimes against property or deter a potential threat thereof.
- C. **Extraordinary Use:** Other official uses as determined by the Chief of Police and approved by the General Counsel or designee.

4. **Appropriate Use and Confidentiality:**

All VSS images and captures are the sole and confidential property of the BHA. No footage shall be shown, disclosed or disseminated to the media, public, internet or any other unauthorized person(s) without prior written approval from the General Counsel or designee or Chief of Police and without compliance with M.G.L. c. 66A.

All information and/or observations made available through the VSS shall only be used for law enforcement purposes or other official purposes as determined or approved by the General Counsel or designee.

No recorded image shall be altered in any manner. The only narrow exception allows for faces of non participants in an incident to be blurred or otherwise obscured for privacy reasons in the event a video or image is officially released to the media.

The VSS is not configured to detect or record audio.

5. **Responsibilities and Authority:**

Responsibility for oversight of the VSS and associated policies, standards and practices is delegated to the Chief of Police in consultation with the General Counsel and Director of Operations or their respective designee. These responsibilities include:

- A. Procurement, deployment and use of the camera systems.
- B. Coordinating evaluation and analysis of the most effective placement of cameras.
- C. Authorizing the placement of all cameras.
- D. Authorizing the purchase of any new camera systems.
- E. Reviewing existing camera systems and installations and providing feedback and recommending required changes to bring them into compliance with this policy.

- F. Creating and approving department and Authority standards and procedures for cameras and their use.
- G. Monitoring protocols for accessing VSS images.
- H. Monitoring and maintaining security for the VSS.
- I. Maintaining evidentiary records pertaining to VSS images.
- J. Monitoring the operations and maintenance of the VSS.

6. VSS Monitoring and Review:

- A. BHAPD personnel may monitor and review live camera feeds and bookmark footage as needed to enhance public safety.
- B. The Chief of Police may assign select police personnel to review live camera feeds, bookmark footage and access and/or record and/or download archived footage in order to aid in investigations or enhance public safety.
- C. BHAPD personnel shall conduct directed live monitoring based on observed and/or reported suspicious activity not individual characteristics. Direct monitoring of individuals based solely on characteristics of race, gender, ethnicity, sexual orientation, disability or other protected classification is strictly prohibited.

7. Use of Cameras for Criminal Investigations:

In addition to the fixed VSS cameras the use of mobile or hidden video equipment may also be used in criminal investigations by the BHAPD or other local, state or federal law enforcement agency in conjunction with the BHAPD. Covert video equipment may also be used for non-criminal investigations of specific instances which may pose a significant risk to public safety, security and property as authorized by the Chief of Police or the General Counsel or designee.

8. Video Capture Requests:

- A. VSS recordings shall be kept on the BHAPD secure server for a minimum of thirty (30) days pursuant to Massachusetts Public Records Law.
- B. All internal requests for video evidence within the BHAPD must be submitted in writing or electronically to the Chief of Police or designee. Recorded video and images become evidence upon download to disc. Sworn personnel must adhere to established chain of custody protocol in subsequent handling.

- C. All video capture requests from non police personnel within the BHA must be forwarded in writing or electronically to the General Counsel for approval. Note: authorized police personnel are available to provide testimony relative to a video capture's authenticity but cannot otherwise participate in disciplinary and/or administrative matters unrelated to public safety.
- D. 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 BHA Administrator, Chief of Police or General Counsel.
- E. All video capture requests shall contain the following information:
- 1) Location to include specific information about address, hallway, floor, exit or elevator as applicable.
 - 2) Date(s) of interest.
 - 3) Time period(s) of interest.
 - 4) Detailed reason(s) for interest.

9. Limitations:

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

This policy does not authorize the capture of video images of any area of BHA property in which a resident has or maintains a reasonable expectation of privacy, exclusive of common areas.