



## **WPCRC SURVEILLANCE CAMERA POLICY**

Purpose: This document is the Parks Division's policy for using surveillance cameras at the Warner Park Community Recreation Center (WPCRC), as required by APM 3-17. The primary purpose of this policy is to balance the City's interests in monitoring the use of the WPCRC, protecting the public safety of those in the facility, and respecting the privacy rights of the public and the associational/collective action rights of City employees. In addition, this policy promotes security for the public and City employees through timely surveillance of areas otherwise difficult to monitor.

Locations: The WPCRC surveillance camera system includes 13 cameras throughout the facility. Video monitoring occurs in common areas of the facility to include; building entrances and exits, lobby and reception area, hallways and corridors, gymnasium, game room, and the childcare room.

Monitoring by surveillance cameras shall not occur in the following areas:

- Bathrooms
- Lockers rooms
- Offices
- Maintenance and storage rooms

Downloading Videos and Images: WPCRC surveillance cameras use digital video recorders (DVR) to store information. The playback feature provides access to video footage. Video and images may be reviewed and downloaded when employees or the public reports an incident or accident. Video is available for 14 days from the time of the incident. After 14 days from the time of the incident, all data is overwritten and becomes unavailable. WPCRC Facility Manager or designee, as outlined in the Public Records section, will provide downloaded videos and images to the City of Madison Information Technology (IT) Department for storage on a secure network server.

Access, Use, and Monitoring: Surveillance records are only shared with individuals directly involved in investigating and following up on the incident, including Park's Management Team, Madison Police Department, the offending individual parents as appropriate, and others who may be directly involved in responding to the incident, including the City Attorney's Office and the City's Risk Manager. The Madison Police Department will be provided with immediate access to all data recordings that may constitute evidence of a crime, upon request, unless otherwise prohibited by law.

Surveillance cameras are not monitored continuously under normal operating conditions but may be monitored for safety and security purposes, including investigating thefts, accidents, misconduct, or property damage. Personnel with access to the surveillance cameras should be trained in the effective use of the equipment. Public notice of security monitoring is located on the facility entrance door.

The following list outlines examples of prohibited use of the surveillance cameras:

- Use of dummy or placebo cameras, personal webcam, or similar technology for surveillance purposes.
- Recording of audio for surveillance purposes.
- The use of a personal cell phone to record or monitor activity.
- Reasons unrelated to surveillance activity including videotaping athletic events for replay or post-game reviews or attendance for programs.



The following list provides additional expectations for the use of the surveillance cameras:

- Personnel, as outlined in the Levels of Access section, may review video from the surveillance cameras when an incident occurs.
- Complete the WPCRC Behavior Report Form with details, including the date, time, and location for incidents requiring video review and place in the WPCRC Facility Manager's box.

Levels of Access: The following individuals shall have access to the login functions to review, save, and download footage from the surveillance cameras. In addition, individuals may also have access to the remote access features.

- WPCRC Program Coordinator
- WPCRC Facility Manager
- Parks Community Services Manager
- Assistant Parks Superintendent
- Parks Superintendent
- WPCRC Maintenance Mechanic shall have access to the Admin login function for maintenance, training, and revocation of access to the surveillance cameras.
- Staff not listed in this section shall have access to the view-only functions.
- Information Technology staff may have access to the surveillance records and equipment as needed to maintain, service, or operate the system.

When any of the above listed persons are no longer in the listed job title, their access to the surveillance records shall be revoked. Revoking this access shall be the responsibility of the Assistant Parks Superintendent, and in their absence, the Parks Superintendent.

Other Responsibilities:

*Assistant Parks Superintendent*

- Authorize copies of surveillance videos or images and the release of records.
- Submit the Annual Surveillance Technology Report to the Common Council.
- Periodically review this policy and make recommendations for revisions to the Board of Parks Commissioners.
- Receive complaints regarding the use of surveillance cameras.
- Conduct an annual review of surveillance technology to ensure compliance with city ordinance MGO Section 23.63.
- Periodically review staff access and use of the surveillance technology

Public Records

- In consultation with the City Attorney's office, WPCRC will maintain, as a public record, images downloaded from the recorders following the video record retention policy outlined below.
- In cases where follow-up action is taken, the images will become part of the files for the incident and be maintained under the video record retention policy outlined below. During the pendency of any public records request, investigation or civil or criminal litigation, no applicable records shall be destroyed.
- The Assistant Parks Superintendent serves as the open records custodian for Parks.
- Records are stored on a secure network server maintained by the City of Madison IT Department. In addition to IT Department staff and representatives of the City Attorney's Office, the following individuals shall have access to the secured network folder.
  - WPCRC Program Coordinator



- WPCRC Facility Manager
- Parks Community Services Manager
- Assistant Parks Superintendent
- Parks Superintendent

Record Retention Policy:

<b>Category</b>	<b>Default</b>
MPD-WPCRC Video	
Parks Superintendent Requests	365 Days
Workers Comp	365 Days
Employee Misconduct	365 Days
User Misconduct	365 Days
Complaints	365 Days
Misc	365 Days
Accidents Slip & Falls Sports & Fitness activities Community programs, rentals, and events Other facility accidents or injuries	4 Years

Training Protocol

The Parks Division employees identified above who have access to the surveillance records will be trained annually, or upon commencement of their employment, on their duties and responsibilities under this Policy. The Assistant Parks Superintendent shall be responsible for this training. No employee shall have access to surveillance records until they have received this training.