

# PARKS DIVISION

# SURVEILLANCE TECHNOLOGY POLICY

## Governing Ordinance and Policy

Madison General Ordinance (MGO) 23.63 addresses the City's use of Surveillance Technology, as that term is defined at 23.63(2). APM 3-17 requires all City Departments that choose to use Surveillance Technology to adopt a written policy on said use. This Surveillance Technology Policy outlines the information required by APM 3-17 and MGO 23.63, including the objectives of the use of video surveillance, the locations of surveillance technologies, the access levels that staff have to the surveillance technology, oversight of the access, and the record retention requirements. The Parks Division will complete an Annual Surveillance Technology Report per MGO 23.63(5) and follow the requirement of MGO 23.63(4) prior to any use of new Surveillance Technology or any substantial change of use of existing Surveillance Technology.

## Date of Adoption

This version of the Parks Division Surveillance Technology Policy was adopted by the Board of Park Commissioners on xxxxx, xx, 2026 (Leg File # xxxxx).

## Objectives

The objective of video surveillance in the Madison Park system is to promote security for the public and City employees, to document events that may threaten the safety of visitors or employees of the park system, or events that threaten park property. Posting signage alerting park visitors to the surveillance will also serve as a deterrent to unwanted behaviors.

## High Priority Areas

The use of video surveillance technology will be limited to the following types of locations:

- Areas with cash handling
- High traffic areas that have the potential for high risk to park users, staff or property
- Areas with sensitive public infrastructure
- Areas that have a pattern of property damage
- Areas that have a demonstrated pattern of behavioral issues that have not been mitigated through other actions.

## Surveillance Camera Locations

Madison Parks has, will or may have security surveillance cameras at the Warner Park Community Recreation Center, Olbrich Botanical Gardens, the Goodman Pool, Madison Parks Golf Program, Reynolds Park, and the Imagination Center at Reindahl Park. Additional cameras may be added in the future consistent with MGO 23.63 .

- The Warner Park Community Recreation Center has cameras in the common areas, lobby and reception area, hallways and corridors, gymnasiums, game room, fitness room, childcare room, and parking lot. A notice is posted that cameras are in use.

- Olbrich Botanical Gardens has or will have cameras in the lobby, gift shop, parking lots, greenhouses, storage areas, administrative areas, and entrances and exit doors. A notice will be posted that cameras are in use.
- The Goodman Pool has or will have cameras at the front entrance, cashier area, concessions area, and pool area. A notice will be posted that cameras are in use.
- The Madison Parks Golf Program has closed-circuit cameras in the Odana Hills clubhouse and may add updated cameras when clubhouse is rebuilt in 2027. A notice will be posted that cameras are in use.
- Reynolds Park has or will have cameras. A notice will be posted that cameras are in use.
- The Imagination Center has or will have cameras at the main entrances of the building. A notice will be posted that cameras are in use.

## Viewing/Downloading Footage

### Video System

The video cameras in the Parks Division will be part of the City's enterprise-wide Genetech Security Center system. The only exception is the camera system at Odana Hills Clubhouse, which is a closed-circuit system.

### Access to Storage

Retained video records are accessed for investigatory and record sharing purposes only. Records are only accessed and reviewed by individuals directly involved with an investigation or a records request.

Individuals that may be involved with an investigation or records request include Parks Division management and supervisory staff, law enforcement officials, the individual involved in the incident, parents/guardians as appropriate, the City Attorney's Office, the City's Risk Manager, and the City's insurance company. The Madison Police Department will be provided with access to all 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.

### Levels of Access

Full access of surveillance systems includes the ability to login for functions to review, save, and download footage from the surveillance cameras. The Parks Superintendent and Assistant Parks Superintendents will have full access across the agency and are responsible for determining staff roles and access. In addition, individual staff members may also have access to any remote and/or live feed access features. IT personnel will have access to service the system as needed.

### WPCRC

#### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Community Services Manager
- WPCRC Facility Manager
- Ranger Supervisor
- WPCRC Maintenance Mechanic
- WPCRC Program Coordinator
- Parks Records Custodian

## Olbrich Botanical Gardens

### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Olbrich Botanical Gardens Director
- Ranger Supervisor
- Parks Records Custodian

## Madison Parks Golf Program

### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Golf Director
- Golf Clubhouse Supervisor
- Ranger Supervisor
- Parks Records Custodian

## Goodman Pool

### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Community Services Manager
- Ranger Supervisor
- Recreation Services Supervisor
- Parks Aquatics Program Coordinator
- Parks Records Custodian

## Reynolds Park

### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Operations Manager

- Community Services Manager
- Operations Supervisors
- Ranger Supervisor
- Parks Records Custodian

## Imagination Center at Reindahl Park

### Full Access

- Parks Superintendent
- Assistant Parks Superintendents

### Review Access

- Community Services Manager
- Operations Manager
- Operations Supervisors
- Ranger Supervisor
- Parks Records Custodian

## Oversight

The Assistant Park Superintendent is responsible for designating a video oversight and compliance manager for each unit utilizing video systems. These individuals will be responsible for ensuring new and current employees within their unit have read and signed off on this policy, are trained to proficiency, and are utilizing the video systems in compliance with this policy and City video surveillance rules.

- Video surveillance system access determinations are made by the Parks Superintendent and Assistant Superintendents based on business needs, public and employee safety and security needs, and position roles and responsibilities.
- Designated video oversight and compliance managers are trained and responsible for receiving and investigating complaints regarding surveillance technology usage. Managers will be made aware of any complaints and investigation processes following.
- Designated video oversight and compliance managers are responsible for training new and current staff to be proficient in software usage, record retention, and system usage rules and policies.
- Designated video oversight and compliance managers are responsible for reviewing access and the usage of surveillance technology systems.
- Designated video oversight and compliance managers are responsible for revoking access when the employee no longer has a job-related need to said access.

### Assistant Parks Superintendent

- Authorize copies of surveillance videos or images and the release of records.
- 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.
- Ensure access to the surveillance technology is revoked when the employee no longer has a job related need to said access.
- Submit the Annual Surveillance Technology Report to the Common Council.

## Public Records

- In consultation with the City Attorney’s office, the Parks Division 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 period of any public records request, investigation or civil or criminal litigation, no applicable records shall be destroyed.
- Records are stored on a secure network server maintained by the City of Madison Information Technology Department.

## Record Retention Policy

Past video within the system is retained for 14 days and is not considered a record. Once video is exported, then it becomes a record and is held for the following time periods.

Category	Default
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

## Use of Other Technology

Temporary self-contained or web-based cameras owned by the City or under contract with the City, whether placed by the Parks Division or authorized requestors, which are used for the purposes of conducting studies within park spaces are not subject to the surveillance policy. Privately owned surveillance technology that is not under contract with the City is also not subject to the surveillance policy. The Park Superintendent may approve these requests or may determine that the request must be considered by the Board of Park Commissioners based on complexity of request. Examples include but are not limited to trail cameras used for conducting wildlife studies, cameras placed and monitored by permitted event organizers or parties whom have formal agreements with the City of Madison for use of park spaces for purposes of monitoring private property within a park, and cameras placed to investigate situations of vandalism or criminal activity. Staff are responsible for ensuring compliance with applicable city ordinances.