

POLICY: Video Surveillance Policy  
DRAFTED: March 1, 2024  
ADOPTED: May 20, 2024

## **I. POLICY STATEMENT**

Penn Township has a responsibility and desire to ensure the safety and security of our employees and visitors to Penn Township. The purpose of this policy is to establish guidelines for, and manage the use of and access to, the Penn Township video surveillance system that is used to monitor and record public areas for the purposes of safety and security.

## **II. SCOPE**

The policy applies to all employees of the Township including the Board of Commissioners. It also applies to all members of the public on Township property.

## **III. POLICY**

The Township reserves the right to place cameras on Township-owned property where necessary and appropriate, as one strategy to help protect the employees and community. The purpose of this policy is to establish guidelines for, and manage the use of and access to, the PENN TOWNSHIP video surveillance system that is used to monitor and record public areas for the purposes of safety and security. Cameras used as part of this may not make audio recordings.

This policy does not apply to cameras operated by the Penn Township Police Department which will fall under the Police Video Policy.

## **IV. DEFINITIONS**

- Video surveillance- The act of capturing motion picture images of a targeted area.
- Video surveillance system- The hardware (cameras, monitors, personal computers, wiring, network access points, servers, memory storage devices, etc.), and software that runs the cameras, computers, servers, and supports the capture and recording of video images on PENN TOWNSHIP property.
- Monitoring- The viewing of live video images as they are happening.
- Video information- Any information captured by or stored within the video surveillance system.
- Video surveillance system operator- An employee authorized to access the PENN TOWNSHIP video surveillance system.

## **V. GENERAL PRINCIPLES**

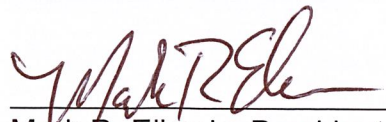
- 1) Video surveillance of public areas is widely used by law enforcement, private security organizations and other organizations in the United States and is a critical component of a comprehensive security plan.
- 2) The purpose of video surveillance cameras in public areas is to deter crime and to assist the Township in protecting the safety and property of the Township community. This can be accomplished by the presence of the cameras as well as the historical record they provide.
- 3) Video recording/monitoring for security purposes will be conducted in a professional, ethical, and legal manner and shall not include audio recordings. Video surveillance system operators will be appropriately trained in the responsible use of this technology. Violations of the procedures referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of Penn Township.
- 4) Video monitoring of public areas for security purposes is limited to uses that do not violate the reasonable expectation of privacy as defined by law. Cameras will not be installed in areas where there is an expectation of privacy, which includes restrooms, locker rooms, dressing rooms, and similar designated areas.

## **VI. PROCEDURES AND PROCESS**

- 1) Video Surveillance Camera Placement:
  - a) The Township may establish temporary or permanent video surveillance cameras in public areas of Township property. These cameras may not make audio recordings.
  - b) Cameras may not be established in private areas of the Township without obtaining proper legal authority. Private areas include bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothing, or private offices.
  - c) Cameras shall not be directed or zoomed into the windows of any private residential building.
- 2) Notification to the Township Community:
  - a) The Township community will be notified that cameras may be utilized. Postings may accompany cameras or simply be posted at the Township entrances, and this policy will be made available to all residents, faculty, staff, and visitors and included in the Township website.
- 3) Video Surveillance Camera Use and Nonuse:
  - a) Cameras are to be used exclusively for Township safety purposes.
  - b) Cameras are not to be used to monitor individual employees, visitors, or staff, except as necessary for a criminal or internal investigation.
  - c) Cameras may be used to prosecute violations on Township property.
  - d) Cameras are not to be used to evaluate employee performance nor to monitor employees during their non-working time.

- 4) Establishment of Video Surveillance Cameras on Township Property
  - a) The Township will determine the placement and use of video surveillance cameras for each Township location.
  
- 5) Video Surveillance Cameras Monitoring
  - a) Video may only be monitored by those approved by the Township to do so. No unapproved employees may monitor or view video for any reason except as necessary in the course of an investigation or adjudication.
  - b) If the Township feels it is necessary to aid in an investigation or search, small video clips or image stills may be released to the media or the public. Prior to releasing the video clip or image still, the face and identifying features of all those on video but not of interest to the investigation will be blurred.
  - c) Those approved to monitor video will receive training in effective, legal and ethical use of the monitoring equipment. These individuals will receive a copy of this policy, provide written acknowledgement that they have read and understand this policy and receive any and all updates or amendments to this policy.
  
- 6) Authorized Access and Use of Video Surveillance Footage
  - a) The Township Manager or their designee may authorize employees of the Township access to the video surveillance system when there is a defined operational reason for having access (e.g., employee safety, protection of assets, or the management of access to areas of the facilities).
  - b) All employees authorized to access video surveillance and monitoring of public areas will perform their duties in accordance with the procedures contained in this policy, other Township policies and procedures, and relevant laws.
  - c) These authorized video surveillance system operators may facilitate the viewing of the video surveillance system by relevant individuals during the course of their duties.
  - d) Video surveillance system operators will not monitor individuals on the basis of race, color, national origin, religion, creed, age, disability, self-identified sex, gender identity or expression, status of being transgender, sexual orientation, familial status, pregnancy, predisposing genetic characteristics, carrier status, military or U.S. veteran status, domestic violence victim status, prior criminal conviction, socioeconomic status, or any other differences among people which have been excuses for misunderstandings, divisiveness, or hatred or other characteristics protected by law and/or Township Policy. Video surveillance system operators will monitor individual activities based upon information developed by investigation, observed suspicious or criminal behavior, and not solely on individual characteristics.
  - e) Additional access to the video surveillance system as an authorized user may only be approved by the Township Manager or their designee.
  - f) Requests to review historical video information of an incident may be made to the Township Manager or their designee. Approval to review the information will be based on an evaluation of the request.

- g) Approval for review or release of the information to non-law enforcement personnel requires the approval of the Township Manger or their designee.
- 7) Requests to Review Recorded Video Information
- a) Internal Requests
    - i) Video requested by PENN TOWNSHIP video surveillance system operators is not subject to the records request procedures. It is the responsibility of the person retaining the information from the system to articulate the reason for the retention of the information, and to document the information retained in an appropriate Township report.
    - ii) Video requested by persons other than video system surveillance system operators must be approved by the Township Manager or their designee, who will defer any inquiry regarding a criminal/civil case or potential evidence to the solicitor's office for a determination.
    - iii) If the video relates to an issue involving employee conduct, then no video will be released without approval of the Township Manager who, in conjunction with the Township attorney, will determine if usage is legal and falls within the agreement between PENN TOWNSHIP and its employees.
  - b) External Requests
    - i) Requests from governmental agencies for reasons of public safety will be evaluated immediately and not subject to a records release.
    - ii) Requests from any other external agency (such as media requests or requests of individuals or legal counsel) must be referred to the Township Manager's Office, which will consult with the Township attorney as to what video information is authorized for release and identify the entity that may receive it in accordance with the Pennsylvania Right-to-Know Law.
- 8) Storage of Video Surveillance Footage
- a) PENN TOWNSHIP video recorders and video information will be kept in secured locations, protected from unauthorized access.
  - b) All information captured by the PENN TOWNSHIP video surveillance system is considered to be potential evidence and treated as such. Thus, video will be treated as confidential and is generally retained for 30 days. Retention of video files beyond 30 days is at the discretion of the Township Manager. Video retention rules will follow applicable law(s).
  - c) After a request is made, the video system will be checked to determine that the requested video is available. If available, and approvals for access to video footage are pending, then an archive copy must be made and stored pending the decision for release.



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Mark R. Elksnis, President  
Board of Commissioners  
May 20, 2024