

## **Digital Surveillance Policy**

### **Purpose**

Selected areas of the library are equipped with video cameras for the protection and safety of patrons, employees, assets, property, and to identify persons breaking the law or violating the Library Code of Conduct. A sign is posted at the library entrance informing the public that security cameras are in use.

The purpose of this policy is to establish guidelines for the placement and use of digital video cameras and still photographs, as well as the access and retrieval of recorded digital video images and still photographs at the Mount Clemens Public Library. Video monitoring and recording will be conducted in a manner consistent with all existing local and applicable laws and ordinances, as well as the Library Privacy Act.

### **Security Camera Locations**

Reasonable efforts are made to safeguard the privacy of patrons and employees. The video security cameras are positioned to record only those areas specified by the Library Director/designee and will complement other measures to maintain a safe and secure environment in compliance with library policies. Camera locations shall not be changed or added without the permission of the Library Director.

Cameras may be installed in locations where staff and patrons would not have an expectation of privacy. Examples include common areas of the library such as entrances, near book and media collections, public seating, delivery area and workroom, and parking lots. Cameras will not be installed in areas where patrons and staff have a reasonable expectation of privacy, such as restrooms; nor are they positioned to identify a person's reading, viewing or listening activities in the library.

### **Access to Digital Images**

Security Officers, in the course of their normal duties, monitor and operate the live video security system.

Only the Library Director, Assistant Director, Executive Assistant, Security Officers, and designated Senior Persons are authorized to access the recorded archival data in pursuit of incidents of criminal activity, litigation, or violation of the Library Code of Conduct. Authorized individuals, with notices to the Library Director, may ask other staff to review recorded data to ascertain security concerns related to a specific incident.

Authorized individuals must access live camera feeds, recorded footage or still images taken from recorded footage on library issued hardware only. Access on personal hardware is strictly prohibited.

Such persons shall not violate any laws relevant to this policy in performing their duties and functions related to the video security system.

Library employees are to review and comply with this policy.

### **Use/Disclosure of Video Records**

- Video records and still photographs may be used by authorized individuals to identify those responsible for library policy violations, criminal activity on library property, or actions considered disruptive to normal library operations.
- Video records may be shared with authorized library employees when appropriate or, upon approval by the Library Director, other library staff to identify those suspended from library property and to maintain a safe, secure and policy-compliant environment.
- Under certain circumstances, individuals authorized under this policy may use a still photograph or selected portions of recorded data to request law enforcement review for assessing security risk of a specific individual or for investigating a crime on library property.
- Video records shall not be used or disclosed other than as specifically authorized by this policy.

Video records may contain personally identifiable information about an individual who has used any library service or borrowed any library materials (“patron information”), and will be accorded the same level of confidentiality and protection provided for library users by Michigan state law (including, but not limited to Act 455 of 1982, “The Library Privacy Act”), Mount Clemens Public Library policies, and the American Library Association policies on confidentiality and privacy.

All requests for security camera footage or still photography by law enforcement will be referred to the Library Director. In his or her absence, direct requests to the Assistant Director, or to the Executive Assistant if they are also not available.

In the event of a search warrant, which is executable immediately, library Administration will comply with the search warrant and consult with legal counsel. Upon receipt of a subpoena or other court order, library Administration shall consult with legal counsel to determine if the document is in proper form and that good cause for its issuance in a court of proper jurisdiction is demonstrated. If not, library Administration shall insist any defect be remedied before releasing records which contain patron information.

### **General Public Requesting Access to Security Camera Footage**

Confidentiality/privacy issues prohibit the general public from viewing security camera footage that contains patron information. If the library receives a request from the general public to inspect security camera footage which contains patron information, the general public will be advised to file a police complaint.

### **Retention of Digital Images**

Images from the library video security system are stored digitally on hardware in the library. Security camera footage is kept confidential and security recording equipment is housed in a locked area. Recordings are kept for no longer than 28 days in accordance with the Library’s records retention

schedule, unless required as part of an ongoing investigation or litigation.

**Unauthorized Access and/or Disclosure**

A breach of this policy may result in disciplinary action up to and including dismissal. Any library employee who becomes aware of any unauthorized disclosure of a video record and/or a potential privacy breach has a responsibility to immediately inform the Library Director of the breach.