

Allegan District Library Security Camera Policy

Purpose

Security cameras are used to enhance the safety and security of library users and staff by discouraging violations of the Library's Code of Conduct, to assist library staff in preventing the occurrence of any violations, and when necessary, to provide law enforcement assistance in prosecuting criminal activity.

SECURITY CAMERA GUIDELINES

1. Video recording cameras will be used in public spaces of library locations to discourage criminal activity and violations of the Library's Code of Conduct. The recording of audio is restricted under the Electronic Communications Privacy Act and will not be used.
2. Cameras may be installed in outdoor and indoor places where individuals lack a reasonable expectation of privacy. Examples include public common areas of the library such as parking lots, entrances, seating areas, service desks, and areas prone to theft or misconduct, or areas where money is stored or handled.
3. Cameras will not be installed in areas of the Library where individuals have a reasonable expectation of privacy such as restrooms or private offices.
4. Signs will be posted at all entrances informing the public and staff that security cameras are in use.
5. Because cameras will not be continuously monitored, the public and staff should take appropriate precautions for their safety and for the security of their personal property. The Allegan District Library is not responsible for loss of property or personal injury.
6. Recorded data is confidential and secured in a controlled area. Video recordings will typically be stored for no longer than 60 days. As new images are recorded, the oldest images will be automatically deleted.
7. Requests for images arising from an approved FOIA action, subpoena, or court order, will be preserved until those requests or orders are resolved.
8. Regarding the placement and use of the digital recording cameras, staff and patron safety is the first priority; protection of library property is of secondary importance.
9. Cameras are not installed and will not be used for the purpose of routine staff performance evaluations; they may be used in the case of staff malfeasance or misconduct.
10. Only the Director and Assistant Director have the authority to approve access to security camera logs and recorded footage.

USE/DISCLOSURE OF VIDEO RECORDS

1. Access to the archived footage by staff is restricted to the investigation of injury, criminal activity or violation of the Library's Code of Conduct.
2. Library staff have access to real-time images, viewable on desktop monitors placed in secure areas to ensure private access. The frequency of viewing and the amount of video viewed will be limited to the minimum needed to assure safety, give assurance that the

system is working, to ascertain if footage is available relative to a specific incident, or to ensure the best patron experience.

3. Access is also allowed by law enforcement when pursuant to a subpoena, court order, or when otherwise required by law.
4. 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 as delineated in the Library Code of Conduct.
5. In situations involving banned patrons, stored still images may be shared with staff system- wide. Shared images may remain posted in restricted staff areas for the duration of the banning period. After the banning period ends, these images will be archived in the Administrative Offices for 5 years.
6. A log will be maintained with name, date, time, and reason for all viewing access including proper maintenance of system, investigation of an incident; pursuant to a subpoena, etc.

UNAUTHORIZED ACCESS AND/OR DISCLOSURE

1. Confidentiality and privacy issues prohibit the general public, unless required by law, from viewing security camera footage that contains personally identifying information about library users. If the Library receives a request from the general public to inspect security camera footage, they will be advised to file a police complaint or submit a completed FOIA request, and fill out a Security Camera Log Request Form.
2. Any form of unauthorized capture, digital or otherwise, is strictly prohibited. No staff member may download recorded footage, capture a recorded or live image by photograph, or make video copies of security camera recordings or live footage.
3. 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 recording and/or a potential privacy breach has a responsibility to immediately inform the Director of the breach.

DISCLAIMER OF RESPONSIBILITY

A copy of this policy may be shared with any patron or staff member upon request. The policy is also posted on the Allegan District Library's official website.

Questions from the public regarding this policy may be directed to the Library Director.

The Library disclaims any liability for use of the video data in accordance with the terms of this policy, given that the library is a public facility and the security cameras shall be limited to those areas where patrons and/or staff have no reasonable expectation of privacy.

Adopted: July 17, 2018

Amended: August 21, 2018