

# GREAT FUTURES START **HERE.**



**BOYS & GIRLS CLUBS**  
OF MID CENTRAL COAST

## **POL018-1** Surveillance Policy

### USE OF SURVEILLANCE

The Boys & Girls Clubs of Mid Central Coast (BGC MCC) recognizes that maintaining the safety and security of Club members, staff, volunteers, and Club property is best implemented with a multifaceted approach. Modern technology, including video and audio surveillance, can provide tools to maintain safety and security. While surveillance does not replace appropriate supervision by Club personnel, it can provide an additional layer of protection.

Surveillance may be utilized in and around the Club facility/campus, on Club property, and on Club transportation vehicles. Video, audio or other surveillance shall be in accordance with all applicable laws pertaining to such use.

### PLACEMENT AND NOTIFICATION

Surveillance equipment may be installed in and around Club facilities, property, and vehicles. The system provides constant monitoring 24/7 (is activated and records when motion is detected).

Surveillance equipment **will not be** used or installed in areas where Club Members, staff, and parents/guardians have a reasonable expectation of privacy, such as locker rooms and restrooms.

Surveillance equipment may always be in operation, whether the Club is operational and whether the facilities or buildings are in use at all. The Club will determine the operation schedule of any video surveillance equipment at its discretion.

Surveillance monitors shall not be in an area that enables public viewing.

The Club shall notify Club members, parents/guardians, staff, and the public that surveillance systems are present as required by applicable law.

### ACCESS TO VIDEO IMAGES OR ANY DIGITAL SURVEILLANCE

The use of surveillance equipment on Club grounds shall be supervised and controlled by the CEO, VP of Club Success, Chief of Operations & Accountability, Chief of Culture & Equity and Club Directors. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may randomly occur as needed.

Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live and video recorded data is **strictly limited** to the following authorized full-time Boys & Girls Club personnel: CEO, VP of Club Success, Chief of Operations & Accountability, Chief of Culture & Equity, Area Directors and Club Directors. These authorized personnel are trained on the surveillance policy and how video and any digital data should be used during any official investigation.

Surveillance recording data may be used as evidence that a Club member, parent/guardian, staff member, volunteer, or other person has engaged in behavior that violates state or local law, policies, and/or Club rules. Surveillance data is subject to production by a valid subpoena or other court order.

## **UNAUTHORIZED ACCESS AND/OR DISCLOSURE**

Confidentiality and privacy concerns limit the general public, including parents and relatives of Club members, from viewing video recording footage and/or surveillance data involving Club members, staff, and volunteers. Only the authorized personnel provided above can view and/or export video and audio recording data. No unauthorized recordings are permitted of surveillance recording data through cell phones, portable devices, or any other means. Any Club personnel who becomes aware of unauthorized disclosure of surveillance recording data from the Club and/or a potential privacy breach must immediately inform the CEO.

Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with surveillance equipment. Violations will be subject to disciplinary action that may include, but are not limited to, written reprimand, suspension, demotion, or termination of employment.

Surveillance recording data will remain the property of the BGC MCC and may be reproduced only in accordance with applicable law and organization policy.

## **MONITORING OF SURVEILLANCE DATA**

Designated Club personnel will have live access to surveillance data for real time monitoring of club members, staff and visitors. Monitoring or review of historical surveillance data will only be done when an incident is reported or a security risk has been identified.

## **RETENTION OF DIGITAL DATA**

Surveillance data shall be kept for approximately 90 to 180 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by authorities. The latter shall be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved. The stored media shall be kept on a secured storage device or service.

In situations involving banned parents/guardians, former employers or volunteers, or visitors, stored still images may be shared with Club personnel and appropriate officials.


## **CLUB MEMBER PRIVACY**

Surveillance recording data will not to be used directly or indirectly to identify the activities of individual Club members except as viewed in relation to a specific event or suspected criminal activity; suspected violation of Club policy or rules; incidents where there is reasonable basis to believe a claim may be made against the Club for civil liability; or if otherwise compelled by law.

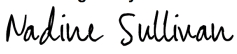
Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property. A copy of this policy will be shared with any Club member, parent/guardian, or staff member upon request.

**Reviewed and Approved: Initial implementation of policy**

**Date:** 6/9/2022

**BY:**  
DocuSigned by:  
  
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Chief Executive Officer

DocuSigned by:  
  
EC9970348CCF486  
Board Chair (Board Approval)

**Audit of Document Changes**

Review / Revision	Date	Approval*	Title

\*Approval can be performed by the Safety Chair, Safety Officer, or CEO after Safety Committee review of revised document.