

# Before the Board of Supervisors County of Placer, State of California

**In the matter of:**

Security Camera Systems Policy

Resolution No.: 2020-081


The following Resolution was duly passed by the Board of Supervisors of the County of Placer at a regular meeting held May 19, 2020, by the following vote:

Ayes: WEYGANDT, HOLMES, UHLER, GUSTAFSON, GORE

Noes: NONE

Absent: NONE

Signed and approved by me after its passage.

  
Chair, Board of Supervisors

Attest:

  
Clerk of said Board

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WHEREAS, protecting the quality of life by integrating safety and security technologies consistent with industry best practices.

WHEREAS, regulate the use of approved Security Camera Systems that are intended to enhance public safety and security.

WHEREAS, formalize the procedures for requesting to deploy a new Security Camera System.

BE IT RESOLVED, by the Board of Supervisors, County of Placer, State of California, to approve the new Camera Policy for the Placer Administrative Manual as set forth in Exhibit A

Exhibit A: Security Camera Systems Policy

# Security Camera Systems Policy



## 1.0. PURPOSE

Placer County is committed to protecting the quality of life by integrating safety and security technologies consistent with industry best practices. A critical component of a comprehensive safety program is the use of Security Camera Systems (SCS) deployed by Placer County. The use of SCS is intended to deter crime, aid in the apprehension of suspects, and enhance the overall safety and security of property and individuals of the Placer County community.

Security Camera Systems are defined as devices that are attached to County occupied buildings or structures that record continuously for security purposes. This includes the physical equipment that records and stores the footage.

To ensure the protection of individual privacy rights in accordance with the core values of Placer County, and State and federal laws, this Policy addresses the use of SCS to meet the safety and security needs of Placer County, while respecting and preserving reasonable expectations of individual privacy.

The purpose of this Policy is to regulate the use of approved SCS that are intended to enhance public safety and security. Additionally, this Policy formalizes the procedures for requesting to deploy a new SCS and updates to an existing SCS, and outlines the requirements for recording, handling, viewing, retaining, disseminating, and destroying SCS images.

The existence of this Policy does not imply or guarantee and should not be construed to imply or guarantee that SCS will be monitored in real-time, twenty-four (24) hours per day, seven (7) days per week.

The following SCS is not covered by this policy:

- a. Mobile recording device used during the course of law enforcement, parking enforcement or transportation operations;
- b. Law enforcement activities governed by other applicable federal; or State laws; or Placer County policies; or Placer County Sheriff's Office (PCSO) policies

## 2.0. POLICY

### a. DEFINITIONS

**Camera** refers to any digital, analog, or another device that captures images, including but not limited to, County implemented security cameras.

**Safety & Security Committee (S&SC)** is the group designated by the County Executive Officer (CEO) with responsibility for receiving request forms, reviewing, recommending approval of systems and handling concerns regarding aspects of the SCS as set forth in this Policy. This committee is comprised of Facilities Management, Information Technology (IT) and Risk Management.

**IT Security** is the team within Information Technology that will monitor the equipment and provide access to SCS servers and storage. Note: Placer County Sheriff's Office (PCSO) camera systems are not governed by this policy, and as a result, IT Security will not have the monitoring oversight for those SCS's.

**Facilities** refers to the buildings, grounds, and all points of public ingress and egress that are located within areas owned or controlled, via leases or other contractual arrangements by Placer County, and whose operations are controlled by Placer County. Facilities include, but are not limited to, offices, labs, classrooms, auditoriums, indoor and outdoor assembly areas, building exteriors, hallways, parking lots and structures, outdoor public areas, and common areas. Buildings, grounds, or other properties owned by the Placer County, but whose operations are under the control and operation of a non-Placer County-related business, will not be considered Facilities under this Policy.

**Image** refers to a depiction or likeness captured or recorded in a single frame (still, snapshot, photograph); a sequence of multiple, single frames shot over a period of time (stop action, time-lapse); or multiple frames that form a moving picture (motion, film, video).

**Open Space** refers to any outdoor area that is generally open to the public, including but not limited to, landscaped areas, courtyards, and pathways of ingress and egress. It also refers to indoor spaces generally considered public although they may have restricted access, including but not limited to, building lobbies, hallways, and assembly areas.

**Operator** is an individual within a particular Department who has been approved by the Department Head to manage, operate, and/or use SCS and/or have access to certain SCS recorded images.

**Department Head** refers to one of the following: Director; Elected Official, or designee.

**Preservation** refers to the process of securely storing and maintaining SCS images to prevent their loss or destruction. Preservation shall be conducted in accordance with the County's Document Retention Policy.

**Security Camera Systems (SCS)** refer to the individual cameras, recorded images, and any system that is used to manage, maintain, store, or control access of individual cameras and/or recorded images. SCS's include the equipment attached to County occupied buildings or structures that record continuously for security purposes. They also include the physical equipment that records and stores the video footage.

**Central Management System** refers to the IT process and documentation for

tracking SCS users, system monitoring, master inventory, software administration, off-boarding, and image retention.

#### **b. POLICY STATEMENT**

1. Placer County strives to provide a safe and secure environment while avoiding unnecessary intrusions upon individual civil liberties.
2. SCS may only be deployed in locations where it is determined that its use will enhance the security and safety of either individuals or property without violating the right of an individual to a reasonable expectation of privacy.
3. The design, installation, implementation, operation, use, management, and maintenance of SCS will comply with all applicable State and federal laws, Placer County policies, including but not limited to, those laws and policies that recognize an individual's reasonable expectation of privacy and prohibit discrimination and harassment. Use must also comply with Placer Public Employees Organization MOU dated 7/1/17 – 7/30/22 (Article 15; section 15.03), or any labor agreement or Placer County ordinance that becomes effective after the effective date of this Policy.
4. S&SC coordinates the management of all SCS, including installation, administration, and operation. SCS shall not operate outside of the centralized management system without prior written approval from the County Executive Office (CEO). Such exceptions will be granted rarely and only in unusual circumstances in which an independent management system is in the best interest of Placer County safety and security as determined by the CEO. In such circumstances, the operations of the independent system must still comply with the other provisions of this Policy.
5. Placer County departments requesting the procurement, installation, and operation of new SCS must comply with the requirements and procedures outlined in this Policy. Existing SCS must comply with this Policy unless a written waiver has been issued by the CEO's office. Existing SCS not in conformance of this Policy will be evaluated for replacement unless a written waiver has been issued by the CEO's office, permitting the continued use of the noncompliant SCS until a specific date at which time the SCS will become compliant or be removed.
6. The use of non-functional SCS (decoy, fake or "dummy" Camera) deliberately designed and positioned to mislead an individual into believing an area is being monitored may generate a false sense of security and are prohibited unless written permission has been issued by the CEO's office in consultation with Placer County Sheriff.

### **3.0 PROCEDURES**

The following procedures set forth the process to request a new or changes to an existing SCS, including access to SCS recorded images, and outlines the requirements for recording, handling, viewing, retaining, disseminating, and destroying live and recorded SCS images on campus.

Any questions or concerns regarding the deployment or operation of SCS should be addressed to S&SC.

#### **a. SCS USE REQUESTS**

The Capital Improvements Committee (CIC) reviews and approves or denies all SCS use requests, including new SCS deployment and updates to existing SCS, in accordance with this Policy. The replacement of equipment of existing approved SCS does not require approval from the CIC if such replacement does not have potential privacy implications (e.g., changes in how digitized information is reviewed or used, changes in the nature of the physical space where someone has the expectation of personal privacy, changes in location or field of view of Camera, etc.).

1. **Submit Request:** Prior to deploying or using a new SCS or updates to an existing SCS, the requesting unit is responsible for obtaining the Department Head's approval, shall complete the required form and documentation (Attachment A) and submit the request to the S&SC via the Safety and Security Improvement Request Form process found on the MyPlacer intranet here:  
<https://myplacer/Departments/FAC/ layouts/15/WopiFrame.aspx?sourcedoc=/Departments/FAC/Public%20Document%20Library/Safety%20and%20Security.pdf&action=default>. SCS installation shall only be conducted following approval by the CIC.
2. **Temporary Exemption:** Exceptions to completing the request forms (Attachments A & B) or any required information is permissible in the event of an imminent threat to the safety and security of the Placer County community. In such circumstances, the Department Head may approve SCS deployment in consultation with CEO, County Counsel and, if deemed necessary, PCSO. As soon as practical, SCS deployment must be documented utilizing the process called out in this Policy.
3. **SCS Inventory:** IT Security will maintain a master inventory of all existing and approved SCS and shall review system inventories at least annually. The review may be performed by evaluating paper documentation (audit), physical inspection, or any combination thereof.

#### **b. SCS OPERATOR REQUESTS**

IT Security maintains a list of Operators and will review Operator access privileges no less than annually to ensure only authorized individuals have access to the SCS.

1. **Submit Request.** Prior to use or access to the recorded images of the SCS, the requesting unit is responsible for obtaining the Department Head's approval, completing the required form and documentation (Attachment B) and submitting the request to IT Security through the Service Now portal.
2. **Criteria for SCS Operators:** SCS Operators shall be limited to individuals who meet and will continue to meet the following:
  - I. Demonstrate a legitimate need for access consistent with the purposes of this Policy as determined by the appropriate Department Head;
  - II. Provide written acknowledgment that they have read, understand, and will comply with this Policy;
  - III. Perform their duties in accordance with this Policy; and
  - IV. Access live or recorded images only to the extent authorized by, and

as permitted by, this Policy.

3. SCS Operator List: IT Security will maintain a list of authorized Operators, including who may be contacted about access to SCS after business hours. Departments must alert IT Security as soon as possible regarding changes to contact information for Operators.

**c. SCS USE & INSTALLATION REQUIREMENTS**

The use of SCS is limited to the purpose of enhancing safety and security, including crime prevention, law enforcement, Risk Management and/or pending disciplinary investigations, and compliance with Placer County policies. SCS shall not be accessed or used for any other purpose except as outlined in this Policy. Once the Capital Improvements Committee (CIC) has approved the use of a new or updates to an existing SCS, IT in conjunction with Facilities Management will coordinate with the Placer County requesting department for the installation, administration, and operation of the SCS in accordance with the following SCS use requirements:

1. Equipment Specifications and Maintenance. All SCS acquired after the effective date of this Policy through purchase or by any other means must comply with the technological and other specifications as determined and set forth by the Placer County Department of Information Technology (DIT). SCS equipment specifications include, but are not limited to, the following:
  - I. All cabling for SCS shall be installed in compliance with current DIT guidelines.
  - II. Each SCS must have a maintenance plan that includes 1) dome-cleaning schedule, 2) regular camera image audits to ensure good image quality, 3) a process to address the repair and replacement of inoperable SCS equipment, including poor image quality and weak or lost signals and pan, tilt, zoom (PTZ) functionality, and 4) a lifecycle replacement schedule.

**d. SIGNAGE AND POSTED NOTICE**

In accordance with any applicable federal, State, and local laws as well as Placer County policies, including the Electronic Communications Policy, and the Placer County Statement of Privacy Values and Privacy Principles, signage shall be posted at building entrances or other areas where SCS have been deployed, indicating that the area is being monitored or recorded. Prior to posting signage, all signage must be reviewed by the Safety & Security Committee as part of the installation process.

As a minimum, standard posted signage should read:

**“Security Cameras on Premises”**

Questions or concerns regarding the content or location of signage should be directed to the Safety & Security Committee.

**e. MONITORING**

SCS monitoring will comply with the following:

1. The monitoring of individuals or groups of individuals through SCS via live feed or recorded images shall be based on current or prior explicitly exhibited behaviors that potentially violate law or Placer County Policy and such monitoring must be conducted in a manner consistent with applicable Placer County, and State and federal laws.
2. SCS established to provide an extended responsibility is monitored continuously. The live SCS images may be monitored by Operators; however, any video images recorded must comply with the Placer County Document Retention Policy.
  4. Under normal operating conditions, SCS are not intended to be continuously monitored may be monitored for legitimate safety and security purposes, that include, but are not limited to, the following: High-risk areas; restricted access areas; areas in which an alarm has been triggered; areas in which special events are occurring; and areas under specific investigations authorized by the Placer County Sheriff or designee.

**f. ACCESS**

Access to SCS live feed or recorded images is limited to operators and persons authorized by the CEO, Department Head, Placer County Sheriff, or County Counsel. A record log shall be kept by IT Security of all individuals with access to and use of live feed or recorded images for each SCS.

This section is not intended to limit the authority of the Placer County Sheriff, IT Security, or the County Counsel's Office to have immediate and unrestricted access to all live and recorded images from all SCS, including legacy stand-alone SCS.

**g. UNAUTHORIZED ACCESS**

Any unauthorized access to SCS, including the inadequate protection, inappropriate use, disclosure, or disposal of live or recorded images must be reported immediately to IT Security and reported, as required by this Policy.

**h. PROHIBITED USE**

SCS shall not be used for the following purposes:

1. Audio recording associated with a video image, except when explicit notice has been given to those being recorded, unless otherwise necessary under subsection h.4 of Section 3.0 (below);
2. Targeted recording or monitoring of individuals based solely on personal characteristics, including age, color, disability, gender, national origin, race, religion, sexual orientation, or other federal or State protected characteristics;
3. To monitor or record sensitive institutional or personal information (e.g., medical records, personnel records, etc.);
4. To monitor or record spaces in which individuals have a reasonable

expectation of privacy, including personal offices, dormitories or other living spaces, unless required and specifically approved by the Placer County Sheriff in connection with a criminal investigation, approved by the CEO for County Counsel in connection with a civil investigation, as directed by a specific court order, or as otherwise allowed by this policy.

#### **i. OPERATOR USE REQUIREMENTS**

Once IT Security has approved the SCS Operator, the Operator must comply with the following Operator use requirements:

1. Access: An authorized Operator may access the SCS in accordance with the type of access approved by this policy and this access may include the monitoring and/or review of live feed or recorded images, solely for the following purposes:
  - I. Maintenance of SCS equipment or systems;
  - II. Investigation of suspected illegal, criminal activity;
  - III. Investigation of claims, litigation, incidents, suspected activities in violation of Placer County policy; and
  - IV. Compliance with legal obligations to preserve, release, or otherwise use live feed or recorded images.
  - V. General safety and security monitoring consistent with the intent of this Policy.

SCS Operators with authorization to review live or recorded images must be provided with appropriate work areas in which said review can be conducted privately to prevent unauthorized individuals from inadvertent, advertent, unintentional, or intentional access. SCS shall provide for individual authenticated user access and logging of user activity consistent with Placer County information systems security standards.

2. Prohibited Use: In addition to the prohibited use of the SCS as stated in this Policy, Operators are also expressly prohibited from:
  - I. Duplicating recorded images for any purpose not permitted by Policy;
  - II. As prohibited by the Placer Public Employees Organization MOU dated 7/1/17– 7/30/22 (Article 15; section 15.03);
  - III. Permitting or providing access to live or recorded images to anyone not specifically authorized by IT Security;
  - IV. Operating or using SCS outside the scope of its intended use; and
  - V. Viewing, recording, accessing or otherwise using SCS in any manner that is inconsistent with this Policy or any other safeguards deemed appropriate by IT Security.

#### **j. RECORDED IMAGES**

1. Storage and Retention of Recorded Images.
  - I. Storage and Retention within SCS.

Any recorded images contained within the SCS system shall be stored, secured, and retained in accordance with this Policy and the County's Document Retention Policy to ensure appropriate security protocols are followed and to prevent unauthorized access, modification, duplication, or accidental destruction.
  - II. Storage and Retention of images for Other Uses.



Any images saved for a legitimate business need outside of routine monitoring and saved, transmitted, or otherwise incorporated into another Departmental file shall be subject to the document retention requirements that exist for that file. Examples of such situations include:

- a. Retention of images by law enforcement as part of a criminal or civil investigation or court proceeding. Any such recorded images copied and retained by law enforcement shall be retained and secured in accordance with the applicable laws and Placer County policies relating to investigatory files.
- b. Retention of images by Risk Management, County Counsel, or other appropriate Department for a legitimate business purpose shall be considered to be part of that Department's file when transmitted from the SCS, and shall be subject to the document retention requirements applicable to that file. In no circumstances shall such image be retained for less than three-hundred sixty-five (365) days. A copy of the written directive authorizing transmittal of the images must be provided to both IT Security and County Counsel. IT Security shall retain the written directive and ensure the preservation of recorded images.
- c. Images subject to a litigation hold issued by County Counsel shall be retained separately within the SCS but shall be retained indefinitely and until County Counsel otherwise directs.
- d. A directive to retain images may occur for any of the following reasons:
  - i. Upon receiving credible notification of a Placer County or law enforcement investigation for alleged illegal activity or violations of Placer County policy;
  - ii. Upon receiving notice from County Counsel that such copying and storage is otherwise needed to comply with legal obligations to preserve materials;
  - iii. Upon receiving authorization that such Preservation reasonably appears necessary to protect Placer County operations;
  - iv. Where there is a reasonable belief that the recorded information may relate to misconduct or violations of law or Placer County policy; or
  - v. Where the video information has historical significance (e.g., building construction, natural or manmade disaster or other historically significant event).
  - vi. In any other circumstance deemed necessary by Risk Management, County Counsel, law enforcement, or the CEO's Office.

2. Public Release of Recorded Images: All requests for the distribution of recorded images must be submitted to County Counsel for review; disclosure of recorded images to third parties shall comply with the California Public Records Act, or as otherwise directed by court order. Responsibility for processing and disclosing requests for images shall be coordinated by IT Security in consultation with Placer County Counsel, Placer County Sheriff,

CEO, Placer County Human Resources, as applicable and appropriate.

3. Deletion or Destruction of Recorded Images: IT Security shall coordinate the deletion or destruction of recorded SCS images. Images that are transmitted to another department and become part of that department's file shall be handled and deleted in accordance with the document retention timeframes appropriate for that file. The deletion or destruction of recorded images shall be accomplished using a product or products that have erase or wiping capabilities that meet or exceed ITD guidelines and protocols. IT Security must be notified when recorded images have been deleted or destroyed outside the parameters defined in this Policy.

**k. NON-COMPLIANCE**

Failure to comply with this Policy may result in disciplinary action under Placer County policies or, as applicable, collective bargaining agreements (up to and including immediate termination of employment, student suspension, etc.), and/or criminal penalties under law.

**I. RESPONSIBILITIES**

The following campus offices and officials have specific responsibilities with respect to the processes set out in this Policy.

RESPONSIBILITY	ACTION
County Executive Officer	Oversees the management of the contents, revisions and the enforcement of this Policy.
Safety & Security Committee	<p>Approves retention requirements.</p> <p>Issues waivers as appropriate to grant exceptions to this Policy and the use of decoy SCS.</p> <p>Receives requests to deploy and operate SCS in and around Placer County open spaces and facilities.</p> <p>Coordinates, as needed, with Placer County Sheriff, Information Technology Division, Insurance and Risk Management, Capital Programs, Facilities Management, Purchasing, and County Counsel to review proposals for the deployment and use of SCS.</p> <p>Ensures that deployment of SCS is consistent with industry best practices, complies with all federal and State laws, and is in accordance with the core values of Placer County and Placer County Policies &amp; Procedures.</p> <p>Responds to concerns regarding the deployment and use of SCS. Coordinates with the appropriate Department Head to address noncompliant SCS, as appropriate.</p>
Placer County Sheriff	Advises Placer County staff as to the appropriateness of proposed SCS as a tool to increase security and that the full field of view of camera conforms to this Policy.
IT Security	<p>Monitors and inspects SCS to ensure compliance with this Policy.</p> <p>Maintains an inventory of all SCS, including Camera locations.</p>

	<p>Reviews and approves or denies requests for proposed Operators.</p> <p>Maintains a list of authorized Operators and other users, including the Operators that may be contacted about SCS after business hours.</p> <p>Oversees the training provided to Operators, including appropriate resource and reference materials.</p>
	<p>Coordinates with the appropriate Department Head to address noncompliant SCS as appropriate.</p>
Insurance and Risk Management	<p>Recommends to the S&amp;SC, SCS installation locations to reduce Placer County liability or loss of property.</p>
County Counsel	<p>Monitors developments in the law, industry practices, and technology pertaining to SCS.</p> <p>Advises Placer County staff as to the appropriateness and compliance of proposed SCS. Advises Departments on records requests, and provides legal advice, as needed.</p>
Department Heads	<p>Ensures SCS are managed within their area of responsibility and are compliant with this Policy.</p> <p>Designates Operators within the Department who will have access to SCS.</p>

**m. REFERENCES**

1. California Public Records Act
2. Placer County Policies & Procedures
3. Placer County Information Security Policies
4. Placer County Information Security Program
5. Placer Public Employees Organization – MOU dated 7/1/17 to 6/30/22

**n. ATTACHMENTS**

- A. Request Form for Security Camera Systems
- B. Request Form for Security Camera Systems Operators
- C. Video Transmittal Release Form

**Request Form for Security Camera Systems**

In order to request a new or update to an existing Security Camera System (SCS), this form must be completed and submitted to the Safety & Security Committee (S&SC) online portal. County of Placer - Security Camera Systems Policy, describes under what circumstances a request for an SCS may be considered for approval. It is recommended that this Policy be read *before* completing this form.

**A. REQUESTER'S NAME, TITLE, and DEPARTMENT/DIVISION**

**B. PURPOSE AND JUSTIFICATION FOR SCS**

**C. BUILDING LOCATION, ADDRESS, and DESCRIPTION of PROPOSED CAMERA LOCATIONS**

Attach a detailed explanation of the SCS, this includes: the physical location of camera(s) locations with a brief description of the space in which the monitoring will occur, typical uses of the space, and the activities likely to be monitored by the SCS; capabilities of the camera(s) (video, pan, tilt, zoomed, etc.)

**D. PROPOSED OPERATORS – List the proposed Operators. If necessary, attach list.**

**E. ORGANIZATION HEAD ACKNOWLEDGEMENT**

I acknowledge that the Department Head has been briefed and is aware of this camera request.

- Yes Date: \_\_\_\_\_
- No Date: \_\_\_\_\_

**F. CAPITAL IMPROVEMENTS COMMITTEE STAFF RECOMMENDATION**

Does the Safety & Security Committee recommend approval?

- Yes
- No

**H. COMPLETED FORM ROUTING**

**Request Form for  
SCS Operators**

**Submit an SCS request**

In order to request an individual to become an SCS Operator, this form must be completed and submit to IT Security. County of Placer – Security Camera Systems, describes under what circumstances a request for an authorized operator may be considered for approval. It is recommended that this Policy be read before completing this form.

I have read the County of Placer – Security Camera Systems Policy

**Current Date**

2010-12-17

**Caller**

**User's Phone**

**Title**

**Department**

**Division**

**Affected Users**

**Proposed Operator**

<b>Name</b>	<b>Division</b>
<b>Department</b>	<b>Employee ID Number</b>
<b>Title</b>	<b>Phone</b>
<b>Email Address</b>	<b>Add Another User?</b> No
<b>Level of Access</b>	

**Level of Access**

- Basic User
- Advanced Privileges for Law Enforcement and By Exception

**Department Head**

**Name**

**Date**

**Email Address**

**Order this Item**

**Quantity**

**Order Now**

**Shopping Cart**

Empty

**Video Transmittal Release Form**

Event Date/ Time	Camera# & Location	Recording Reproduced by:	Date/ Time	Chain of Custody Delivered to:	Date/ Time	Chain of Custody Delivered to:	Date/ Time
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	
		Print _____ Sign _____		Print _____ Sign _____		Print _____ Sign _____	

**Released Authorized by:**

<b>Print Name:</b>	<b>Position:</b>	<b>Date and Time:</b>
<b>Signature:</b>	<b>Department:</b>	<b>Phone:</b>

**Released Information to:**

<b>Print Name:</b>	<b>Agency/Department/Firm:</b>	<b>Date and Time:</b>
<b>Signature:</b>	<b>Address:</b>	<b>Phone:</b>