

## PERSONNEL POLICIES AND PROCEDURES

<b>Subject</b>	<i>Video Surveillance Policy</i>
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### BACKGROUND

SEPA Labs strives to provide a safety conscious and enriched environment for its employees. The use of video surveillance technology allows SEPA Labs to foresee problems and better utilize resources.

This policy is intended to create a structure for video surveillance at SEPA Labs, which will encourage a safe working environment for all Employees.

### POLICY

Any video surveillance device installed, used, monitored, or recorded on or within SEPA Labs' premises must have the approval of management. It is the responsibility of SEPA Labs management to establish and maintain approval and operational guidelines concerning the installation and continued use of video surveillance technologies. Buildings that have video surveillance capabilities are required to place external signs in conspicuous places notifying the public that a video surveillance system is operating.

#### *General Principles*

- A.** SEPA Labs is committed to the development and perpetuation of programs designed to provide a safe and healthy work environment. Integral to this commitment is the use of video equipment to deter crime, assist in response to security issues and provide information for criminal investigations. Safety and security purposes include, but are not limited to:

  - Protection of individuals, including staff, and visitors;
  - Protection of property;
  - Investigation of criminal activity and/or disciplinary issues.
- B.** Any video recorded, collected or preserved in any manner is the property of SEPA Labs and cannot be released to external entities without the proper approval process established by SEPA Labs' management.
- C.** Any diversion of video technology for any purpose other than safety or security concerns (e.g. monitoring of political or religious activities, personal gain, employee performance) is therefore prohibited by this policy. No video surveillance equipment will be installed for the sole purpose of covertly monitoring employee behavior in the absence of evidence pointing to criminal behavior involving a particular employee(s).
- D.** Video monitoring for security purposes will be conducted in a professional, ethical and legal manner and will not violate anyone's reasonable expectation of privacy. Cameras will not be installed in areas where there is an "expectation of privacy".

- E.** Video monitoring of public areas for security purposes at SEPA Labs is limited to uses that do not violate the reasonable expectation to privacy as defined by law. An individual's or a group's behavior may warrant specific monitoring with community safety in mind. However, no one will be selected for monitoring based on discriminatory criteria such as gender, race, sexual orientation, national origin or disability.
- F.** Covert video surveillance equipment that complies with other areas of this policy and used within the legal bounds and process may be used. Covert cameras will only be used to aid in criminal investigations and require approval of Dr. Patrick Godbey or Mr. Barham Cook.
- G.** Video surveillance equipment found to be illegal, installed without approval, or used in such a manner that violates any portion of this policy can and/or will be removed and/or confiscated.

## **DEFINITIONS**

**CCTV** – Closed Circuit Televisions are video camera technologies used to transmit a signal to a specific place for viewing or recording that is not broadcast to the general public for consumption. Typically these specific locations have a limited set of monitoring devices or recording devices designed for the sole purpose of observing or retrieving these images.

**Video Surveillance Device** – Camera or camera equipment used in the collection and/or monitoring of video imagery for the purposes of observing persons, places or things. These may include CCTV systems or web based cameras known as webcams, and some may have the capability to store images in an electronic format for later viewing.

**Webcams** - are video cameras designed to feed images in real time to a computer or computer network via USB, wired ethernet or through Wi-Fi enabled connections, some may feed real time imagery to webpages for viewing. Typically the images are not recorded and the feeds are not monitored.

## **PURPOSE**

This policy is to serve as the governing document covering the installation, use and monitoring of any video surveillance device installed and under the control of SEPA Labs on SEPA Labs property. The intent is to promote the use of these technologies in a consistent, ethical and appropriate manner.

This policy does not in any way imply or guarantee that video surveillance devices will be indefinitely operational or actively monitored at any time. The presence of physical video surveillance does not in any way imply that activity is recorded or monitored. Public areas will be defined as any portion of SEPA Labs' buildings or facilities that are accessible to the general public and where no expectation of privacy is granted by statutory law. Additionally, public area monitoring may extend to common areas of the building where typically only employees of the SEPA Labs are reasonably expected to gather and no expectation of privacy is granted by statutory law (e.g. hallways, building entrances, external parking areas, and lobbies, etc). All privacy protections granted by law will be adhered to.