

# The Underline Management Organization Closed-Circuit Television (CCTV) Monitoring Policy

## Introduction

The Underline Management Organization (TUMO) uses closed-circuit television (CCTV) recordings and related images to protect TUMO's public space and to provide a safe and secure environment for staff and visitors to TUMO's operational premises. This policy (CCTV Policy) sets out the details of how TUMO will collect, use, and store CCTV recordings and related images.

## General Principles

1. TUMO is committed to enhancing the quality of life of The Underline community by integrating the best practices of public and private monitoring with state-of-the-art technology. One valuable component of a comprehensive security plan using state-of-the-art technology is closed-circuit television (CCTV).
2. The purpose of CCTV monitoring of areas available to the public by security personnel is to deter crime and to assist security staff and local police in protecting the safety The Underline visitor's and the property it manages.. Uses of CCTV equipment, recordings or related images for other purposes (e.g., CCTV monitoring of political or religious activities, or employee and/or student evaluations) are subject to approval from TUMO.
3. CCTV monitoring for security purposes will be conducted consistent with all existing TUMO policies, including the CCTV and [privacy policies](#).
4. Personnel involved in video monitoring will be appropriately trained and managed to confirm that Personnel's use of CCTV equipment and recordings is in accordance with the CCTV Policy.

## Purposes of CCTV

The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the premises operated, maintained and programmed by TUMO.
- Monitoring compliance with the health and safety rules and TUMO procedures.
- Identification of unauthorized actions or unsafe practices that might result in disciplinary proceedings being instituted against Personnel and to assist in providing relevant evidence.
- To help inform TUMOs visitor counts and determine areas and times of high demand.

## **Location of CCTV Cameras**

CCTV cameras are located at strategic points throughout TUMO's premises, principally at the defined amenity areas and destinations. TUMO has positioned the cameras so that they only cover communal or public areas on TUMO's premises and they have been sited so that they provide clear images. All changes to camera locations must be approved by the Facilities Manager or Chief Innovation Officer.

All cameras (with the exception of any that may be temporarily blocked by vegetation or installations) are also clearly visible.

## **Recording and Retention of Videos and Images**

Recordings and related images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to confirm that CCTV equipment is working properly and that the media is producing high-quality images.

Videos and images may be recorded either in constant real-time (24 hours a day, 7 days a week), or only at certain times, as the needs of TUMO dictate.

Any CCTV images that are held on a cloud storage system or server are deleted and overwritten on a recycling basis every 30 days. Irrespective of the storage equipment, once it has reached the end of its use, all recordings and related images on the storage equipment will be erased prior to the storage equipment's disposal or deactivation.

Recordings and related images that are stored on, or transferred onto removable media such as CDs or which are stored digitally are retained until the purpose for which they are collected has been satisfied.

Notwithstanding the above, recordings will be retained if retention is otherwise required by applicable law or to assist with a law enforcement investigation.

## **Access to and Disclosure of Recordings and Images**

Recordings and related images are stored in a secure location. Access to recordings and related images is restricted to the operators of the CCTV system and to those line managers who are authorized to view them in accordance with the purposes of the system. If media on which images are recorded are removed for viewing purposes, this will be documented.

The real time feed from these CCTV will be shared with Miami Dade Police Department, Miami Dade County Department of Transportation and Public Works and City of Miami Police

Department. Disclosure of recordings or related images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the US Department of Justice or Federal Bureau of Investigation and analogous state and local agencies.
- Relevant legal representatives.
- Managers involved with TUMO performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

Video may not be distributed to outside, non-governmental, public sources, and may only be viewed for investigatory purposes solely by the entirety to which it was released. Exemption from disclosing the video to outside, public sources is governed by:

“Pursuant to Florida Statute Section 119.071(3) and Florida Statute Section 281.301, and consistent with Central Florida Regional Transportation Authority v. Post-Newsweek Stations, Orlando, Inc., 157 So. 3d 401, Case No. 5D14-360 (5th DCA 2015), the video footage from surveillance cameras on or in transit vehicles is confidential and exempt from public inspection. As such, said video footage cannot be provided or made available for your review.”

All requests for disclosure and access to recordings or related images will be documented, including the date of the disclosure, to whom the recordings or related images have been provided and the reasons why they are required.

### **Compliance with CCTV Policy**

TUMO expects all TUMO Personnel to comply with the CCTV Policy. If you have any questions about the policy or suspect noncompliance, please send an email to [hello@theunderline.org](mailto:hello@theunderline.org). Consequences for noncompliance range from verbal and written warnings to probation or termination, depending on the severity of the noncompliance.

### **Updates to the CCTV Policy**

TUMO will monitor new developments in the relevant law and in security best practices to confirm that CCTV monitoring at The Underline is consistent with industry standards. TUMO may make updates to the CCTV Policy from time to time. The effective version is available [here](#).