



VIDEO SURVEILLANCE POLICY

Updated April 2024

Video Surveillance

The Boys & Girls Club of Worcester (B&GCW) and Boys & Girls Club of Webster-Dudley (B&GCWD)* recognize that maintaining the safety and security of Club members, staff, volunteers, visitors and property is best implemented with a multifaceted approach. To the extent modern technology provides tools to maintain safety and security, the use of technology such as video surveillance cameras is approved by the Board of Directors. Video surveillance may be utilized in and around our Club facilities and property. Video surveillance shall be in accordance with applicable laws pertaining to such use. The Club shall also comply with applicable laws related to maintaining video recordings. The Executive Director is charged with developing regulations governing the use of video surveillance in accordance with applicable law and board-approved Club policy.

Exclusions

Video monitoring is not permitted in areas where there is a reasonable expectation of privacy, including:

- Bathrooms
- Shower areas
- Locker rooms and changing areas

Placement and Notification

1 a. Boys & Girls Club of Worcester - Harrington Clubhouse: Video surveillance equipment is installed in and around our owned and operated Club facility, The Harrington Clubhouse, its parking lot and land located at 65 Boys & Girls Club Way, Worcester, MA 01610, as approved by the Executive Director or designee in consultation with the Safety Committee Chair and management team.

1 b. Boys & Girls Club of Worcester - Great Brook Valley Clubhouse: Video surveillance equipment is installed by the Worcester Housing Authority at their building leased to the Boys & Girls Club of Worcester for onsite Club programming located at Great Brook Valley, a public-housing community (180 Constitution Ave., Worcester, MA 01605). An agreement is in place with the Worcester Housing Authority to ensure the Boys & Girls Club of Worcester has access to video footage of the facility and surrounding area whenever requested by the Executive Director or designee, as well as live footage of the entrances and exits during program hours that is accessible to the front desk receptionist or unit director.

The Boys & Girls Club of Worcester and Boys & Girls Club of Webster-Dudley have aligned on a shared video surveillance policy. However, both Clubs maintain separate decision-making processes for their video surveillance systems. Each Club exclusively uses its own setup and does not exchange video footage, information, or images between their systems.

1 c. Boys & Girls Club of Worcester - Plumley Village Clubhouse: The Boys & Girls Club of Worcester has purchased and installed cameras for the outreach site program located at Plumley Village, a privately-owned low-income community (16 Laurel St., Worcester, MA 01608). The space is leased to the Club by Community Builders, the owners and operators of Plumley Village.

2. Boys & Girls Club of Webster-Dudley - Marilyn & Gerald Fels Clubhouse: Video surveillance equipment is installed in and around our owned and operated Club facility, its parking lot and land located at 55 Oxford Ave., Dudley, MA 01571, as approved by the Executive Director or designee in consultation with the Safety Committee Chair and management team.

Pertaining to all sites:

- Video surveillance equipment may be in operation 24 hours per day on a year-round basis at any and all times, whether or not Club programming is in session and whether or not the facilities or buildings are in use.
- Video monitors shall not be located in an area that enables public viewing.
- Conduct, activities and incidents in publicly accessible places on Club property (e.g. hallways, lobbies, cafeterias, program rooms, swimming pools, front desk/reception area, athletic facilities, outdoor play areas, etc.) may be recorded by video devices.
- The Club shall notify members, staff and the public that video surveillance systems are present. Such notification will be included in employee and member handbooks and signs will be prominently displayed in appropriate locations throughout the buildings and properties.

Use and Access to Video Images

1. The use of video surveillance equipment at the B&GCW's Harrington Clubhouse and the B&GCWD's Fels Clubhouse and their Clubs' grounds shall be supervised and controlled by the Executive Director and Deputy Director. The use of video surveillance equipment at Club program sites not owned by the Boys & Girls Club of Worcester (Great Brook Valley and Plumley Village), will be supervised and controlled by the Executive Director, Deputy Director and Unit Director in direct collaboration with the designated public housing authorities.

2. Staff, members, volunteers and visitors are prohibited from unauthorized use, tampering with or otherwise interfering with video recordings and/or video camera equipment. Violators will be subject to appropriate disciplinary action. Disciplinary action shall be consistent with applicable Club policies and regulations and may include, but not be limited to, written reprimand, suspension, demotion or dismissal for staff and suspension and/or expulsion for members, volunteers and visitors, depending upon the nature and severity of the situation.

3. The Executive Director, Safety Committee and Board of Directors will review the use and operations of the video surveillance system at each Club site on a periodic basis.

4. Video recordings may be used as evidence that a member, staff, or other individual has engaged in behavior that violates state law, Club policies and/or rules. Video footage is subject to production by a valid subpoena or other court order.

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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 data involving Club members, staff, and volunteers. Only the authorized personnel provided above can view and/or export video recording data. No unauthorized recordings are permitted of video recording data through cell phones, portable devices, or any other means. Any Club personnel who become aware of unauthorized disclosure of video recording data from the Club and/or a potential privacy breach must immediately inform the Executive Director. Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video 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. Video recording data will remain the property of the BGCW, for its three sites and the BGCWD, for its sole site, and may be reproduced only in accordance with applicable law and board policy.

Storage/Security/Retention

1. The B&GCW and B&GCWD shall provide reasonable safeguards including, but not limited to password protection, well-managed firewalls and controlled physical access to protect the video surveillance system from hackers, unauthorized users and unauthorized use.
2. Video recordings will be stored for a minimum of 30 days after the initial recording. If the Executive Director knows no reason for continued storage, such recordings will be erased.
3. Video recordings held for review will be maintained in their original form pending resolution of the incident. Recording media will then be released for erasure, copied for authorized law enforcement agencies or retained in accordance with applicable law and Club policy.
4. To ensure confidentiality, all videos are stored on the Cloud and access is limited to the Executive Director, Deputy Director, Facilities Manager (if directed by the Executive Director), Safety Committee Chair and law enforcement, when warranted.
5. Video recordings held by the BGCW and the BGCWD for member and/or personnel records shall be maintained in accordance with applicable law and Club policy.
6. To the extent required by law, a written log will be maintained of those viewing video recordings including the date and location of viewing, reasons for viewing, date the recording was made and the viewer's signature.
7. Recordings will remain the sole property of the B&GCW and the B&GCWD and may be reproduced only in accordance with applicable law and Club policy.

Club Member Privacy

Video 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

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use a still photo 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.

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