


GUAM BEHAVIORAL HEALTH AND WELLNESS CENTER		
TITLE: Security Camera Policy	POLICY NO: AD-HS-05	Page 1 of 2
RESPONSIBILITY: Health and Safety		
APPROVED BY:  THERESE C. ARRIOLA, DIRECTOR	DATE OF ORIGINAL APPROVAL: SEP 24 2019	
	LAST REVIEWED/REVISED: 9/24/19.	

PURPOSE:

To regulate the use of security cameras and the review of video footage on Guam Behavioral Health and Wellness Center's (GBHWC) main facility. This policy will guide the Safety and Security Guard Unit (SGU) and provide transparency in the use of video camera technology in achieving a safe and secure environment in accordance with the Healthcare Insurance and Portability and Accountability Act (HIPAA).

POLICY:

- A. Guam Behavioral Health and Wellness Center (GBHWC) strives to meet the safety and security of its population and protect its property while respecting the privacy of its employees, consumers and guests.
- B. GBHWC shall implement the necessary security equipment such as security cameras without audio recording to add an extra layer of security by deterring theft or violent behavior and keep the employees, consumers and its property secure.
- C. GBHWC shall commit to utilizing the security cameras in a professional and ethical manner in accordance with the agency policy, local, state and federal laws regulating the use of video surveillance.
 1. Surveillance cameras shall only be installed in common or public areas and shall not be hidden. It shall be installed but not limited to areas such as entrances and exits, elevator and fire escapes, entrance to restricted areas, equipment or medicine storage cabinets.
 2. To maintain patient confidentiality, camera shall not be installed in crisis stabilization units, bathrooms, treatment rooms or directly facing a computer.
 3. Technical safeguards shall be implemented such as access control to the monitor and video feeds or recordings.
 4. Signage should be used when appropriate.
- D. The GBHWC Director and the Deputy Director shall maintain oversight for the appropriate use of surveillance camera and its placement, authorize review of video footage, and approve personnel request for review.
- E. Only GBHWC Guards, Safety Officer or the Director's authorized designee(s) may monitor and review security camera feeds and recordings as needed to support investigations, enhance public safety and support the mission of the Safety and Security Guard Unit.
- F. Security camera recordings may NOT be used in the course of a complaint against the agency, agency employees, or in the course of personnel investigations unless directly relevant/related to security and safety.

DEFINITIONS:

Security camera: a camera used for monitoring or recording public areas for the purposes of enhancing public safety, monitoring restricted areas or equipment, to discourage theft and other criminal activities, and for preventing, investigating, and resolving incidents.

Security camera monitoring: the real-time review or watching of security camera feeds.

Security camera recording: a digital or analog recording copy of the feed from a security camera.

Security camera viewing: the reviewing or watching of historical security camera feeds.

Security camera systems: any electronic service, software, or hardware directly supporting or deploying a security camera.

Private areas: includes Inpatient Units, bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothes, and private offices. Additionally, rooms for therapy or treatment are private.

RESPONSIBILITIES:

A. Health and Safety Officer

1. Will ensure that records related to the use of security cameras and recordings from security cameras are compliant with this policy, HIPAA and relative Privacy Acts.
2. Will periodically review compliance and the technological safekeeping of the security camera systems, policies and standards.
3. Shall ensure recordings of video footage are secured in the Guard Office.
4. Shall report to the Director and Deputy Director any incidences requiring review of security cameras.

PROCEDURE:

A. Security Camera Historical Review and Live Monitoring

1. Guards who monitor live video footage and any personnel who review recorded footage are required to sign a confidentiality statement approved by the Director and or Deputy Director and must be trained on the HIPAA, privacy rights and ethical practices.
2. If there is an incident investigation that requires the review of recorded footage, the Health and Safety Officer shall file a request using authorization form *F-AD-HS-05 Surveillance Camera Recording Review Authorization Form*.
3. All recordings shall be kept secured in the Guard Office.
4. Duplication, release, or distribution of images must be authorized by the Director or designee and must adhere to HIPAA and any relevant privacy acts.
5. Images will be maintained for a minimum for 7 days and no longer than 20 days, unless part of an active investigation or needed to support the mission of the agency.
6. Information that directly affects an investigation will be kept until no longer necessary and may be subject to established evidentiary standards while still following agency records retention policies and procedures.

ATTACHMENT(S): *F-AD-HS-05 Surveillance Camera Recording Review Authorization Form*



GUAM BEHAVIORAL HEALTH & WELLNESS CENTER

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Security Camera Review Authorization Form

Date of Request		Requested By	
Reason for request			
Date & Period of Time Requesting to Review			
Reviewer(s)			
Requested Location(s) to Review			
<input type="checkbox"/> Request Approved	Comments:		
<input type="checkbox"/> Request Denied	Comments:		
Authorized By:			
Signature			



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REVIEW AND ENDORSEMENT CERTIFICATION

The signatories on this document acknowledge that they have reviewed and approved the following:

Policy Title: Security Camera Policy

Policy No: AD-HS-05

Initiated by: Environments of Care Committee

Date	Signature
8/2/19	

Alfred Garrido
Safety Officer

Date	Signature
8/7/19	

Jeremy Lloyd-Taitano, RN-BC
Acting Nurse Administrator

Date	Signature
8/5/19	

Shermalin Pineda
RRP Program Manager

Date	Signature
SEP 20 2019	

Carissa Pangelinan
Deputy Director