



EMPLOYEE MANUAL	
Policy Title: PRIVACY AND CONSENT (SECURITY CAMERA MONITORING) POLICY	
Policy No.: 44.0	Section Nos.: 44.0-44.9
Approval Date: September 2, 2025	Effective Date: September 2, 2025
Approved By: Board of Directors	

44.0 PRIVACY AND CONSENT (SECURITY CAMERA MONITORING) POLICY

44.1 Purpose:

To ensure a safe and secure workplace while balancing operational needs and employee privacy, SCV Water uses video and limited audio surveillance in designated public areas across its facilities. This policy outlines employees' rights and the Agency's practices regarding the use, access, and retention of surveillance audio and video footage ("Surveillance Data").

This policy applies to all individuals on SCV Water premises, including employees, contractors, and visitors.

44.2 Notice and Consent

44.2.1 SCV Water monitors public and open work areas for safety, security, and operational purposes. By working on SCV Water premises, employees acknowledge and consent to being subject to such surveillance.

44.2.2 Monitoring may include, but is not limited to, building entrances, parking lots, common areas, open office spaces and work areas, and warehouse or utility yard locations.

44.2.3 Surveillance will not occur in areas where a reasonable expectation of privacy exists, such as restrooms, locker rooms, or designated changing areas, in accordance with California Labor Code § 435(a).

44.3 Privacy Expectations

44.3.1 Employees should not expect privacy in public or open work areas that may be monitored by SCV Water's surveillance systems.

44.3.2 Surveillance will not be used to monitor private offices unless required for a specific business purpose and authorized by executive management and legal counsel.

44.4 Use of Surveillance Data

44.4.1 Surveillance Data may be used to investigate safety incidents, employee misconduct, or property damage, and may be disclosed to law enforcement, legal



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counsel, or other authorized parties.

44.4.2 SCV Water may use Surveillance Data in determining appropriate disciplinary actions, up to and including termination, if applicable.

44.4.3 Surveillance Data may be disclosed to law enforcement or legal authorities when required by law, court order, or in connection with a formal claim or investigation.

44.4.4 SCV Water’s surveillance systems are intended to deter and document incidents; real-time monitoring is not guaranteed at all times.

44.5 Access and Security Controls

44.5.1 Access to Surveillance Data is restricted to designated personnel, including security staff, IT, executive management, Human Resources, and legal counsel.

44.5.2 Only designated security staff are authorized to view live surveillance camera feeds.

44.5.3 Surveillance Data is stored on secure systems and may only be accessed by those designated in subsection 44.5.1 above for legitimate business, investigative, or legal purposes.

44.5.4 Audit logs and access controls will be maintained to track access to Surveillance Data and support data integrity, and these logs shall be subject to audit.

44.5.5 Any misuse, unauthorized access, or disclosure of Surveillance Data is strictly prohibited and may result in disciplinary action, up to and including termination.

44.6 Retention

44.6.1 SCV Water retains video surveillance recordings for a minimum of 90 days, or longer if they relate to an active investigation, claim, or pending litigation.

44.6.2 In accordance with Government Code §§ 53160 and 53161, destruction



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of video recordings will follow established Agency policies, legal procedures and timelines.

44.7 Protection of Data

44.7.1 Surveillance Data is subject to appropriate technical and organizational security measures to prevent unauthorized access, tampering, or loss.

44.7.2 If SCV Water uses third-party providers for data storage, those vendors must meet appropriate data privacy and security standards.

44.8 Signage and Public Notice

44.8.1 SCV Water will post visible signage at facility entrances and other monitored areas to inform employees, visitors, and contractors that video surveillance is in use for security and operational purposes.

44.8.2 Signage will be placed in a clear and conspicuous manner and will indicate that surveillance audio and video may be recorded and used in accordance with Agency policy.

44.9 Training and Oversight

44.9.1 Personnel authorized to access Surveillance Data shall receive training on responsible use, access protocols, data security, and legal obligations related to workplace surveillance.

44.9.2 SCV Water will periodically review and update this policy to reflect changes in law, technology, or operational needs.

All employees will be provided with a copy of this policy and are required to sign and acknowledge that they have read, understand, and agree to comply with its provisions. Each employee, by signing the policy acknowledgment, hereby (i) acknowledges that the surveillance technologies discussed in this policy are used by SCV Water for safety and security purposes; (ii) consents to such use; and (iii) further acknowledges that if any Surveillance Data reveals that an employee has violated any of SCV Water’s rules or policies, SCV Water may rely on and evaluate the acts and behavior of the employee captured in the Surveillance Data to take possible disciplinary action against the employee, up to and including termination.

(Originally adopted September 2025)