

# RiskTopics

## **Strategies for the effective use of surveillance cameras in hotels**

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Video surveillance camera use has become an important tool in overall premise security programs used by hotels for the protection of life, property and assets. While not effective as stand-alone security features, security cameras can and have been used effectively as part of an integrated security program to reduce the potential for crime, enhance physical controls, assist in investigations and enhance public/life safety. Surveillance cameras should be deployed as part of an overall security program with consistent monitoring and ability to provide prompt emergency response.

### Introduction

Generally, there are no specific requirements regarding use of video cameras for security purposes, such as location, type and number of cameras and real-time surveillance, with a few exceptions such as ATM locations. These decisions should be based on an overall premises security assessment, including a careful review and analysis of the security needs and a security threat assessment of the hotel's premises, and should be part of an integrated overall safety and security program. ASIS International and the National Fire Protection Association (NFPA) have adopted guidelines for the use of security cameras as part of an integrated security program. In light of the emerging terrorism exposure, video surveillance is increasingly becoming an important element of a site security program in many public and private locations. However, most businesses, including hotels, are required to operate under a standard of reasonable care. As such, it is critically important that a legal review and a risk assessment review be conducted prior to the development and implementation of any security camera system.

### Discussion

In hotels, front lobbies and registration desks, perimeters, elevator lobbies, roof top access and parking lots are commonly under video surveillance. Other areas such as cash-handling operations, retail stores, luggage and valuable guest storage, loading docks, storage areas (alcohol and high end retail), meeting rooms, common areas and other sensitive locations, such as the front and back of a hotel, can also be monitored using cameras.

Video surveillance systems in hotels serve many purposes. They are often utilized for crime and theft prevention, incident investigation and post incident review. Video surveillance recordings are most often used reactively post incident by both hotel management and law enforcement to review a particular incident or activity. A comprehensive video surveillance program can be a powerful tool for a hotel.

Many factors and decisions are involved in the development and implementation of a comprehensive video surveillance system and program including where to locate video surveillance camera(s). There is no "one size fits all" approach for video surveillance use, nor can there ever be.

In order to develop a comprehensive security program, certain factors should be taken into consideration, such as:

- Type of hotel operation and clientele
- Threat/risk assessment – Current Crime Index in the area
- Location
- Physical layout
- Neighborhood
- Staffing
- Management commitment
- Legal review
- Climate

In addition to the above elements, other factors may influence the use and scope of a video surveillance system, such as perimeter controls, alarm systems and patrol procedures.

## Guidance

The following are some considerations that should be helpful when making the decision to implement a video surveillance program for your business.

### 1. Are security cameras needed or necessary?

A formal review of the hotel's overall security program should be conducted prior to the purchase or installation of security cameras. There should be specific reasons for the use of cameras. The review of security programs may indicate an alternative resource or solution instead of cameras (oftentimes more cost-effective). These alternative solutions can include, but may not be limited to, revising existing security procedures or upgrading other existing physical security features such as locks, doors or lighting. Cameras typically do not solve problems. Solid policies, procedures and a strong management commitment to security, loss prevention and safety solve problems.

When video surveillance is used for monitoring of employees in hotels, significant legal issues must be considered. Laws regarding audio recording and wire-tapping are much more defined than the laws regarding video surveillance. Although employers may have legitimate need for surveillance in the workplace, appropriate legal guidance must be obtained for developing company policies on video surveillance. In addition, various state privacy laws may exist that must also be followed, so a review of any existing laws should be conducted prior to installation of surveillance equipment. Video surveillance for prevention of thefts, investigation of sexual harassment and other workplace misconduct may be legitimate business purposes. In most circumstances, an employee does not have an expectation of privacy in the lunchroom, hallways, entrances, parking lot and other public areas in the workplace and video surveillance of these areas may be acceptable.

Surveillance of back hallways, storage areas and office areas without walls and doors may also be considered reasonable under some circumstances. Video surveillance of the restrooms and change rooms almost certainly involve unwarranted intrusion of privacy and violation of privacy rights.

Video surveillance is generally permissible in public areas open and accessible to a larger number of people. Individuals do not have an expectation of privacy in such public areas. Some companies also choose to post warning signs (for example, "This public area is monitored for personal safety and property protection.")

### 2. What is the purpose/use of the security camera?

Generally, there are two distinct applications for security cameras. Each application brings a separate level of requirements.

First is the traditional use for the prevention or identification of property or loss prevention issues. An example would be a camera located on a loading dock, employee entrance or other areas where internal or property or company asset losses have occurred. The second application is considered strictly for life safety. Examples of cameras used for life safety would be at a swimming pool, exercise room or even parking lots.

3. How will the camera(s) be monitored?

All security cameras should have some level of monitoring and recording. Cameras surveillance used for property/asset protection application should minimally be recorded in accordance with its legal evidentiary needs. Recording can be in real time or time-lapsed digital motion sensor recording can help in catching needed footage without eating up large amounts of data storage. Utilizing cameras with motion sensors can be a valuable alternative to allow for the storage of a large amount of recorded data. Surveillance recordings should have date and time stamp capabilities. The recordings should be maintained and reviewed regularly, and archived for a consistent period for future need. Also, a legal opinion should be obtained to determine the minimum length to archive recordings.

In addition to the recording mentioned above, there is a reasonable expectation that cameras used for life safety purposes are being monitored in real time. Only trained staff identified as competent to observe and identify potentially unsafe activity should monitor these cameras. There is a reasonable expectation from the public that if they see a camera, it is operable and someone is monitoring and help will arrive promptly in the event of an emergency incident. Security cameras used in such life safety and emergency response function should have dedicated monitoring duties to reduce potential for any distractions.

4. Are there written procedures for the use and monitoring of the cameras and response to a potential incident?

There should be written procedures and trained personnel in place to respond to any incident observed on a surveillance camera. Written procedures should include the notification of response personnel, medical and law enforcement and management for various "foreseeable" incidents or emergencies.

5. Are existing cameras in good working condition?

All security cameras should be maintained in good working order once installed. Outdoor installations will require appropriate protection of the equipment from weather elements and vandals. Mounting options (high or low), back-up power and service maintenance access must be considered. There should be a preventative maintenance program/schedule for the cameras and related components such as cabling, monitors and recording equipment. Like all preventative maintenance, these activities should be documented. If a camera is expected to be out of service for an extended period, is inoperable or is no longer intended to be used, it should be removed.

6. Are there any special considerations for installation?

Security specialists and surveillance system equipment manufacturers are a valuable source of information and guidance for installation. Fixed surveillance cameras are not very effective for surveillance of large open areas where there is constant movement. Large open areas such as parking lots should be monitored by means of multiple cameras and possible overlapping cameras to give better coverage. Cameras with pan tilt and zoom (PTZ) capabilities provide more flexibility in surveillance of large areas, such as long corridors and parking lots. Innovative arrangements with track-mounted cameras that travel the length of long areas have also been effectively used.

There are many reputable national, regional and local video surveillance cameras contractors available to hotels and other businesses. Care should be used to determine which company best fits your business needs. As with any significant expenditure, multiple proposals should be obtained prior to making any purchase.

There are many technologies available for video camera systems such as digital, internet-based, etc. Cameras can be hardwired or wireless for transmission. For wireless cameras, consideration may have to be given for the interference issue and the transmission frequency. Appropriate lighting is crucial to an effective video surveillance. The camera and, more importantly, the lens selected should be capable of operating with the available light. Cameras used for outdoor surveillance must be able to accommodate a broad range of variable light conditions ranging from natural daylight to nighttime illumination. Multiple cameras can be monitored from a security post by means of split screens and multiple monitors. Also, surveillance rooms should not be left unattended for extended periods.

When installing a specific video camera location, either fixed position or PTZ, care should be taken to ensure the view of the camera is focused on your specific property, unless directed by legal counsel or local jurisdiction. Unintended surveillance of public or other private property may result in the assumption of unwanted responsibility and potential liability.

When setting up new cameras either programming a PTZ or setting a fixed location make sure to only focus the camera on your specific property and not on any public area for which you are not responsible. If you are focusing on a public area off of your property you can create a false sense of security if something happens on that area and you do not respond.

**Never use dummy cameras!** As previously stated, the public (and employees) have a reasonable expectation that the video cameras are functioning and trained employees are monitoring them. Dummy and inoperable cameras can easily create a false sense of security.

Covert surveillance camera use, while allowed in some jurisdictions, may have significant legal ramifications. It is imperative that local and corporate legal counsel be involved to review and approve the use of covert surveillance cameras.

Other surveillance tactics such as audio surveillance and wiretaps are usually not permitted under law. These and any other form of surveillance must never be used without a comprehensive legal review.

## Conclusion

According to common law, businesses such as hotels are required to exercise reasonable care for the safety and security of their guests, patrons and employees. The use of surveillance cameras with proper planning, installation, maintenance and procedures can be effective components of an overall integrated security and loss prevention program. As mentioned previously, care must be taken regarding the selection, type, locations and monitoring levels of each camera in use. An honest assessment of your video surveillance needs along with a comprehensive legal review should always be conducted prior to the purchase and installation of a video surveillance system.

## References

ASIS International: Risk Assessment Guideline

NFPA: National Fire Protection Association 731, Guideline for Premise Security

Anthony Marshall: At Your Risk Column, *Hotel & Motel Management Magazine*, November 18, 2002

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