

Video Camera Doorbell Policy

1. Introduction:

The Boston Housing Authority (BHA) is committed to enhancing the quality of life of its residents by integrating the best policies for safety and security with technology. The safety of BHA residents and employees is of paramount importance. A critical component of a comprehensive safety plan is the regulation of the use of video camera doorbells by BHA residents. The regulation of the use of video camera doorbells is intended to ensure that these devices are being used for their proper purpose.

2. General Principles:

The BHA is authorized to regulate the use of video camera doorbells by BHA residents to protect the safety and privacy of all BHA residents and employees. Video camera doorbells shall be used in a manner in accordance with BHA policy as well as local, state, and federal laws and regulations. All BHA residents who elect to install a video camera doorbell are responsible for complying with this policy in the installation and operation of their devices.

3. Purpose & Scope:

This policy applies to all BHA residents and household members who elect to install a video camera doorbell. The purpose of this policy is to ensure the protection of individual privacy rights in accordance with the BHA's core values and state and federal laws. This policy is adopted to formalize procedures for the installation of video camera doorbells and the handling, viewing, retention, and dissemination of any recorded video or audio. The existence of this policy does not imply or guarantee that any particular BHA resident has the right to or will be allowed to install a video camera doorbell.

The use of video camera doorbells will be limited to uses that do not violate the reasonable expectation of privacy, as defined by law [MGL Chapter 214, Section 1b], of BHA residents and their guests, BHA employees, and those lawfully on BHA property. Where appropriate, the BHA reserves the right to confiscate video camera doorbells from BHA residents who use the device for improper purposes.

4. Appropriate Use and Confidentiality:

BHA residents may install a video camera doorbell so long as it only captures the area immediately outside their unit and cannot capture another resident's door.

4.1 Placement and Configuration Requirements

- a. Video camera doorbells must be securely mounted to the BHA resident's leased premises without causing damage to shared property.
- b. The field of view of the video camera doorbell must be limited to the BHA resident's immediate entryway.
- c. The field of view of the video camera doorbell must not capture or monitor activity in common areas, neighboring units, other BHA residents' doorways, or BHA employee offices.
- d. In the event that a BHA resident's door is across the hall from another BHA resident's door, neither BHA resident will be permitted to install a video camera doorbell.
- e. In the event that a BHA resident's door is across from a BHA employee's office, the BHA resident will not be permitted to install a video camera doorbell.

4.2 Permitted Uses:

Video camera doorbells may only be used for the following purposes:

- a. Monitoring the BHA resident's own doorway for security purposes;
- b. Facilitating visitor management or package delivery monitoring; and
- c. Enhancing the BHA resident's personal security without infringing upon the rights or privacy of other BHA residents and employees.

4.3 Prohibited Uses:

- a. Video camera doorbells may not be used to intentionally surveil, monitor, or record other BHA residents and their guests, BHA employees, or common areas.
- b. Video camera doorbells may not be used to intimidate, harass, or interfere with the quiet enjoyment of BHA residents and employees.
- c. Any footage which incidentally captures common areas, BHA residents and their guests, and BHA employees shall not be shared or disseminated on social media or with third parties.

5. BHA's Rights and Obligations

BHA reserves the right to request that any BHA resident un-install a video camera doorbell based on a violation of this policy, or other BHA policies.

BHA may inspect resident-installed video camera doorbells to ensure compliance with BHA policies. If any violation is identified the BHA may:

- a. Send the BHA resident notice that they must adjust their video camera doorbell within **48 hours** of receiving written notice of the violation;
- b. Send the BHA resident notice that they must remove their video camera doorbell within **24 hours** of receiving written notice of the violation;
- c. In the case of serious privacy violations, the BHA may immediately deactivate or remove the video camera doorbell while an investigation is pending;
- d. Pursue lease enforcement up to and including termination of tenancy.