

 <div> PA TURNPIKE COMMISSION POLICY <i>This is a statement of official Pennsylvania Turnpike Policy</i> </div>		NUMBER: 8.10 APPROVAL DATE: 10-18-2011 EFFECTIVE DATE: 11-02-2011 REVISED DATE: 02-07-2023
POLICY SUBJECT: Video and Image Recording	RESPONSIBLE DEPARTMENT: Information Technology	

A. PURPOSE:

This policy sets guidelines and requirements for the use of video cameras and image cameras for safety, security, and operations. This policy is intended to regulate the use of video and image cameras in accordance with all applicable federal and state laws.

The functions of video and image cameras are to assist in protecting property, enhancing public and workforce safety, and contributing to efficient roadway operations.

B. SCOPE:

This policy applies to all employees; full-time, part-time, temporary, interns, annuitants, independent consultants, summer, and contract employees.

C. GENERAL POLICY:

Cameras may be installed or used in situations and places where the security of people, property, or PTC operations would be enhanced. When appropriate, cameras may be placed system-wide, inside and outside of PTC facilities. Camera use will be limited to situations that do not violate the reasonable expectation of privacy as defined by law.

Cameras will be used in a manner consistent with all existing PTC policies and federal and state laws. Unless specifically authorized by a court in accordance with federal or state laws, audio recording is prohibited.

Camera data has various records retention and destruction requirements, which are determined by the type of camera in use. These requirements are documented in the PTC Records Retention Schedule.

The existence of this policy does not imply or guarantee that security cameras will be monitored in real time continuously or otherwise. Tampering with or causing damage to PTC cameras is prohibited. Use of a mobile device to record PTC live video streams is strictly prohibited.

New Camera Requests

The PTC camera installation request process will be used to review and approve the installation of new security cameras. Requests shall be submitted via the camera request ServiceNow catalog item and reviewed by the PTC Video Camera Request Committee. Camera installations must adhere to the latest published camera specification, which is included in the construction specification provided as part of bid documents.

To maintain uniformity and security of camera equipment, the installation of cameras shall be completed per the specifications of the Information Technology department and the camera equipment shall comply with the PTC Security standards.

No cameras, or other monitoring devices shall be installed without being properly approved and in compliance with the standards of this policy.

System Access and Video Availability

Only personnel authorized through the PTC security request process will be given access to video footage or camera images. This is especially applicable in cases where remote access is requested as uncontrolled remote access will have a negative impact on the PTC network.

Recorded video and images shall be secured, and viewing access will be granted based on the following:

- a. Viewing of persons in recorded video shall be limited to approved personnel with a legitimate business need to know and with the prior approval of the Director of HR, Chief Counsel, or Chief Technology Officer. As necessary, live feeds will be interrupted through the VBrick streaming system.
- b. Access for reasons such as acts of vandalism, stolen/missing items, or other security issues must be authorized by the Assistant CTO - Security & Infrastructure.
- c. Any Right-To-Know law request for video footage or camera images will be authorized in accordance with PTC's Open Records policy. or video recordings or images must be made within 60 days of the date the recording was made.
- d. Any court order, subpoena or other legal request for video footage or camera images shall be sent to the legal department for response.

External access to PTC video feeds is provided through the PTC Video Management System. No other form of video access is permitted for end users.

Authorized personnel may review the images from security camera data but only as it relates to their job responsibilities.

Device Specific Provisions

Security, fleet, drone, and roadway cameras must be integrated through the PTC Video Management System. Exceptions to the integration provision must be approved by the Information Security Officer.

Digital Video Audit System (DVAS) Cameras are recorded and are viewable in the Intelligent Toll Management System (ITMS) / Infinity Cashless Tolling system. Access is granted based on security roles of the above systems. The Toll Systems Integrator is responsible for installation and maintenance of DVAS cameras.

License Plate Image Capture System (LPICS) Cameras are not directly accessible for viewing images. Images are processed and subsequently viewable by PTC. The Toll Systems Integrator is responsible for installation and maintenance of LPICS cameras.

Roadway Cameras are not recorded; they are live feeds only and are publicly available. Requests to record roadway camera video for training or incident management purposes must be approved by the Chief Counsel.

Fleet Video Cameras are not recorded; they are live feeds only and are used to assist with safety and incident management.

Temporary Construction Project Cameras are owned by the construction company or sub-contractor that is providing construction services to the PTC. The construction company is responsible for providing the PTC with a video stream that is viewable within our Video Management System.

Work Zone Speed Enforcement Cameras are owned and maintained by the Automated Work Zone Speed Enforcement (AWZSE) vendor.

D. DEFINITIONS:

Video Camera Request Committee: A committee comprised of five (5) voting members as follows: the Chief Technology Officer, who will serve as chair of the committee; the Chief Operating Officer; the Chief of Compliance, Legislative & Cultural Affairs; the Director of Facilities Operations, and the Information Security Officer.

Security Camera: A camera that has the ability to record images in an area. May be digital or tape recording.

Video Conference Camera: A camera that is connected to a personal computer. Used to transfer images electronically to a video conference participant. Not a continuously monitored camera. Activated by the user. (Teams, WebEx, Conference Rooms, etc.)

Fleet Video Camera: A video camera that is installed on a PTC fleet vehicle to assist with safety and incident management.

Mobile Device: A computing device that is easily carried by a person, is designed to operate with wireless connectivity, possesses local data storage and includes a self-contained power source.

License Plate Image Capture System (LPICS) Camera: A camera that captures still images of vehicle license plates.

Digital Video Audit System (DVAS) Camera: A camera that monitors tolling equipment/lanes.

Drone Camera: A camera that is designed to be used on a drone or unmanned aerial vehicle (UAV). Depending on the type of drone, the camera may be removable or built in.

Temporary Construction Camera: A moveable Closed-Circuit TV (CCTV) camera provided by a construction company during a project that provides the PTC a view of the work.

Roadway Camera: A camera that monitors traffic on the PA Turnpike highway system.

Work Zone Speed Enforcement Camera: A vehicle mounted camera that detects the speed of passing vehicles and captures still images of those vehicles.

E. VIOLATIONS:

Violations of this policy are to be referred to the Chief Compliance and Diversity Officer to initiate the formal review process. Violations must not be investigated, independently, by individuals or departments. Individuals found to be in violation of this policy may be subject to disciplinary action, up to and including immediate termination, or separation from the PTC for consultants and contractors found to be in violation of this policy.

This Policy Letter supersedes all previous Policy Letters on this subject.