



**REGULATION ON THE OPERATION OF SECURITY CAMERAS
IN THE STATE INSURANCE FUND CORPORATION**

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SECTION I – INTRODUCTION

The State Insurance Fund Corporation (Corporation) is committed to providing employees, patients, employers, and the general public visiting any office of the Corporation with a safe and secure environment where life and property are protected. To achieve this, it is necessary to implement a suitable security system that includes electronic surveillance and recording technology in the designated locations.

The Corporation recognizes the constitutional right of workers in Puerto Rico to be protected against threats to physical and emotional well-being in the workplace. Therefore, there shall be no security cameras in any locations where an individual has a reasonable expectation of privacy.

SECTION II – LEGAL BASIS

This Regulation is promulgated in accordance with the powers vested in the Board of Directors and the Administrator of the State Insurance Fund Corporation under the Compensation System for Work-related Accidents Act, Act No. 45 of April 18, 1935, 2 L.P.R.A. §§ 1b-3 and 1b-4 (1935 & Suppl. 2023). These provisions authorize the adoption of rules and procedures as are necessary to regulate the efficient operation of this public corporation.

SECTION III – PURPOSE

The purpose of this Regulation is to regulate the operation of the electronic surveillance system through the use of security cameras in every office of the State Insurance Fund Corporation in order to protect property and ensure the safety of individuals.

Furthermore, it establishes minimum security measures that consider the reasonable expectation of privacy of individuals, the controls to access the security video system, as well as all that pertains to the custody, disposition, storage, retention, and use of recordings.

SECTION IV – APPLICABILITY

The provisions of this Regulation shall apply to employees, patients, employers, contractors, and the general public visiting any office of the State Insurance Fund Corporation.

SECTION V – DEFINITIONS

For the purposes of this Regulation, the following words or phrases shall have the meaning stated below:

1. **Common Areas** – Part of the premises used by visitors or employees of the State Insurance Fund Corporation where there is no expectation of privacy such as parking lots, hallways, open work areas, elevators, entrances, exits, among others.
2. **Signage** – Placards posted throughout the premises informing employees and the general public that the premises are being recorded and monitored for security purposes.
3. **Security Camera** – A technology device installed in the designated locations that captures and records images simultaneously. All cameras shall be operational seven (7) days a week, twenty-four (24) hours a day. Some of these cameras may rotate and others may zoom in via commands from the security center.
4. **Electronic Surveillance System Monitoring and Operations Center (COMSVE, Spanish acronym)** – A center established by the SIFC in all its offices where the equipment that receive and record the security system's signals are located.

5. **Contractor** – A natural or juridical person to which the Corporation has awarded or is in the process of awarding a Professional and Consulting Services Contract.
6. **Corporation** – The State Insurance Fund Corporation or SIFC.
7. **Server** – A digital storage device designed to record, store, and play images captured by video cameras.
8. **Employee** – The employees who work at the State Insurance Fund Corporation and all its offices.
9. **Privacy** – An individual's or an employee's reasonable expectation that his or her privacy would be respected in public and private places.
10. **Monitor** – Electronic device in which the images captured and recorded by the security cameras may be watched in real time.
11. **Camera Operators** – A person designated by the Associate Director of the Corporate Security Office to operate such cameras.
12. **Camera footage** – Recording of captured images of people on the premises of the Corporation, as well as the activities, events, and operations being conducted in the areas where the security cameras have been installed.
13. **Electronic Surveillance** – A system that includes, among other components, security cameras installed in specific locations on the premises of the Corporation and all its offices for the purpose of protecting public property and maintaining order in public service.

SECTION VI – ELECTRONIC SURVEILLANCE SYSTEM MONITORING AND OPERATIONS CENTER

This Operations Center shall be within the Corporate Security Office. The necessary equipment shall be installed to observe the sequence of images captured by the security cameras installed inside and outside the facilities of the Corporation, the Industrial Hospital, and all its offices.

1. Access to this area shall be limited and controlled. Only the personnel designated to work in this area and law enforcement officials conducting an

investigation, with the prior approval of the Associate Director of the Corporate Security Office or his or her authorized representative, may enter this area. Any person who enters the COMSVE shall fill out form **CFSE 10-015**

– LOG OF VISITORS TO INTERNAL OFFICES WITH SENSITIVE DATA.

2. The use of any information obtained through the recorded footage by the monitoring and surveillance system shall be restricted and limited. Disclosing or disseminating videos or pictures without the approval of the Associate Director of the Corporate Security Office is strictly prohibited. The Associate Director of the Corporate Security Office or his or her designee shall have full access to the system, including recorded and stored material. Only Coordinators and Security Officers, with the prior approval of the Associate Director of the Corporate Security Office, may have access to recorded and stored material.
3. Coordinators, Corporate Security Officers, or the person designated by the Associate Director of the Corporate Security Office may zoom in any direction with the surveillance system. The Corporate Security Office Coordinator notify the State police as soon as he or she observes any unauthorized activity; in the case of criminal activity, the place, the people involved, and the activity observed shall be described. If an operator observes suspicious activity, such operator shall contact the Corporate Security Coordinator and the Corporate Security Officer or security guard of the place where the incident is taking place. The Operator identifying an incident shall prepare a clear and detailed report of the incident using form **CFSE 10-008 – PRELIMINARY INCIDENT REPORT**.
4. Images or recorded footage from the COMSVE shall be retained for one (1) month. Recordings involving incidents under investigation may be retained for a longer period until the investigation is completed. Recordings involving medical emergencies, fires, explosions, and accidents of any kind may be retained for longer periods. Recordings shall be provided and retained by the

Coordinator, the Corporate Security Officer, or person designated by the Associate Director of the Corporate Security Office. These officials are responsible for discharging the following tasks, among others:

- Retain the recordings for the period provided herein.
- Determine, with the approval of the Legal Advice Division, whether a recording is no longer useful.
- With the prior approval of the Administrator of the Corporation, release the images in the camera's preconfigured format or in the appropriate data storage device.

The Coordinator, the Corporate Security Officer, or person designated by the Associate Director of the Corporate Security Office shall keep custody of the recordings and ensure the integrity thereof. If a recording is part of an administrative record, it shall be retained for the same period the Corporation is required to keep the record. The aforementioned recordings shall be disposed of with the approval of the Legal Advice Division and the written authorization of the Associate Director of the Corporate Security Office.

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5. The images captured by security cameras and recorded at the COMSVE may be used in criminal and administrative investigations by the authorized personnel. For the purposes of a criminal investigation involving an employee, patient, visitor, or contractor who has allegedly violated any applicable statutory, criminal, or regulatory provision in which the recording is needed as evidence, the obtained recordings shall meet the requirements for maintaining the integrity of physical evidence, for which the Coordinator, the Corporate Security Officer, or person designated by the Associate Director of the Corporate Security Office shall keep a record from the time the recording is obtained until the final disposition thereof, and maintain it unaltered. These requirements shall also be met when the recordings are to be used in an administrative investigation concerning employees or officials of the

Corporation who have allegedly violated any statutory or regulatory provisions applicable to them.

SECTION VII – SECURITY CAMERAS

As a security measure and to protect employees, contractors, patients, visitors, and public property, security cameras shall be installed in the Corporation and all its offices.

1. The purpose of this system is to record any activity that poses a threat to the security and integrity of the property and persons who work in and visit any office of the Corporation. If information about any potential criminal act is received or as warranted, the camera system shall be programmed to record one or more scenes continuously. In addition, this camera system shall serve to collaborate with public safety, investigation, and oversight authorities in their investigations.
2. The areas monitored by security cameras include, but are not limited to, lobbies, work area entrances and exits, areas where confidential records, controlled drugs, and securities are kept, hallways, waiting rooms, reception areas, access points, and exterior grounds, such as exits, patios, sidewalks, surrounding streets and areas, parking lots, and any other place deemed appropriate due to security reasons.
3. Video cameras are easily visible because they are installed in places visible to employees and visitors.
4. Security cameras have no audio recording mechanisms. These cameras shall be in operation and recording twenty-four (24) hours a day seven (7) days a week.
5. The Corporation shall not install security cameras in places where there is a marked expectation of privacy such as restrooms, locker rooms, rooms reserved for nursing. Also, the Corporation shall not install hidden cameras of any sort. Additional cameras may be installed, or existing cameras may be relocated should the need to enhance surveillance arise.

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6. Signs shall be displayed in the common areas informing the general public that the premises are being recorded twenty-four (24) hours a day, seven (7) days a week.
 7. Any designated person, or any person intervening with the security camera system shall receive training on the technical use of cameras and monitors, and on the legal provisions related to the use of this technology. Contracted security guards shall be in charge of the operation and management of the system in the monitoring control room. However, the Associate Director of the Corporate Security Office may designate personnel from his or her office to perform support duties and any other task related to the operation and management of the security camera operating system; provided, they have been trained on such tasks.
 8. No person shall be authorized to use the video camera system for purposes other than those authorized in this Regulation.
 9. Any intentional act that results in damage to the equipment or that interferes with the operation thereof shall be subject to corrective and disciplinary action or to a referral to public safety, investigation, and oversight government entities, as applicable.

SECTION VIII – NONCOMPLIANCE WITH THE REGULATION ON THE OPERATION OF SECURITY CAMERAS IN THE SIFC


The personnel designated to monitor security cameras shall exercise discretion in discharging their duties; provided, that any violation of these rules shall be sufficient cause for dismissal. These employees must observe the code of conduct established in Act No. 1 of January 3, 2019, as amended, known as the Puerto Rico Government Ethics Office Organic Act and the Internal Regulation in effect on the Code of Conduct and Disciplinary Procedures for Employees of the State Insurance Fund Corporation, among other rules applicable to them as public servants. Security guards hired to work at the COMSVE shall fully comply with the provisions of this regulation. The security company's management shall be requested to immediately dismiss any


security guard who violates or fails to comply with these provisions, in accordance with the terms of the contractual agreements.

SECTION IX – SECURITY CAMERA AND RECORDING SIGNAGE

Signs in the Spanish and the English languages shall be conspicuously posted. Such signs shall inform, as a security measure, that the building is being monitored by an electronic surveillance system (security cameras), which is recording twenty-four (24) hours a day. Public notices may be posted on the Corporation's webpage at the discretion of the Administrator.

SECTION X – PROCEDURE FOR VIEWING SURVEILLANCE CAMERA RECORDED FOOTAGE AND MAKING INQUIRIES ABOUT THE ELECTRONIC SURVEILLANCE SYSTEM

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1. Any requests for surveillance camera recorded footage for administrative purposes shall be made using form **CFSE 18-005, PUBLIC RECORD REQUEST** available on the Corporation's webpage: transparencia@fondopr.com. The request shall be evaluated and approved in accordance with the applicable laws and regulations.
 2. Any request for surveillance camera recorded footage for criminal or civil investigation purposes received through a court, legislative, or administrative order shall be forwarded to the Legal Advice Division in accordance with the regulations in effect.
 3. Any visitor, patient, contractor, or employee against whom a criminal, civil or administrative action is brought based on surveillance camera recorded footage under the custody of the Corporation may request to view the same. Such visitor, patient, contractor, or employee shall submit a request to view surveillance camera recorded footage as provided in this regulation. The request shall state the date, time, and place where the incident in question occurred. Form **CFSE 10-022, REPORT OF INCIDENTS OBSERVED THROUGH THE MONITORS OF THE SIFC'S SECURITY SYSTEM** shall be used.

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4. The Legal Advice Division and the Corporate Security Office shall be responsible for approving the viewing of surveillance camera recorded footage, which shall be conducted at the Corporate Security Office during business hours.
 5. The requestor and his or her counsel (if the request was based on a criminal, administrative, or civil case) as well as any other person authorized by the Associate Director of the Corporate Security Office or the Assistant Administrator for the Legal Advice Division may be permitted to view the recorded footage. Only the portion or portions of the footage that are pertinent to the matter or subject of the request, as authorized by the Corporation or ordered by a judicial, administrative, or legislative forum shall be shown.
 6. A copy of the surveillance system recorded footage may only be provided for official purposes upon request by law enforcement officers, employees, or officials carrying out official duties, upon prior authorization of the SIFC Administrator and by order of a court or an administrative or legislative body for investigation or adjudication purposes.
 7. The release of a copy of the surveillance camera recorded footage to law enforcement authorities or authorized persons shall be acknowledged on an official receipt signed by the Associate Director of the Corporate Security Office or his or her authorized representative for such purposes. The time and date on which a surveillance camera recorded footage was reviewed, as well as the date of the alleged event or incident shall be recorded using form **CFSE 10-022, REPORT OF INCIDENTS OBSERVED THROUGH THE MONITORS OF THE SIFC'S SECURITY SYSTEM**. In addition, the name, telephone number, and identification of the person or persons reviewing the recorded footage shall also be recorded using form **CFSE 10-023, SURVEILLANCE CAMERA FOOTAGE REQUEST**.

SECTION XI – GRIEVANCE PROCEDURE

Any controversy, complaint, dispute, or claim concerning the application or interpretation of the provisions of this Regulation shall be addressed as follows:

1. If the complainant is an employee who is a member of an Appropriate Unit, the complaint and the procedure to be followed shall be that established in the Collective Bargaining Agreement or Contractual Agreement in effect for resolving complaints and grievances, pursuant to these Agreements, and the complaint shall be handled through the Labor Relations and Equal Employment Office.
2. If the complainant is a citizen, visitor, or employee who is not a member of an Appropriate Unit, the following procedure shall be followed:
 - a. The employee, citizen, or visitor shall file a written complaint with the Legal Advice Division, which shall determine the procedure to be followed and refer the complaint to the appropriate offices.
 - b. Written notice of the grievance outcome or decision shall be delivered to the employee or citizen who filed the complaint with a return receipt requested.

SECTION XII – RIGHT TO PRIVACY

The electronic surveillance and video monitoring system shall not violate the right to privacy of employees, officials, visitors, or patients. Therefore, the Corporation shall not install security cameras in places where there is a high expectation of privacy, such as restrooms, locker rooms, or rooms reserved for nursing. Also, the Corporation shall not install hidden cameras of any sort.

SECTION XIII – PROHIBITION

1. The use of this equipment for purposes other than those authorized in this Regulation is prohibited.
2. The assignment or copy of images captured in accordance with this Regulation is prohibited, except as otherwise provided in **SECTION X**. Taking

pictures or making video recordings of the monitors that display the camera image is also prohibited.

3. Eating in the COMSVE monitoring control room established in every office of the Corporation is hereby prohibited.
4. Security Coordinators and Corporate Security Officers shall have access to the monitoring control room only when reviewing camera footage or equipment for investigation purposes, as authorized by the Director of the Corporate Security Office.

SECTION XIV – SEVERABILITY

If any section, subsection, or part of this Regulation shall be held to be void by a competent Court, the holding to that effect shall not affect the remaining provisions thereof which shall remain in full force and effect.

SECTION XV – REPEAL

Internal Regulation 20-12-06 on Security Standards and Operation of Security Cameras in the State Insurance Fund Corporation of May 16, 2012, is hereby repealed.

SECTION XVI – APPROVAL

This document was approved by the Board of Directors of the State Insurance Fund Corporation, by **Resolution Number A-47-2025** of **June 9, 2025**.

SECTION XVII – EFFECTIVENESS

This regulation shall become effective within thirty (30) days from its filing with the Department of State.



Enid Inalbis Ortiz Rodríguez, MBA
Administrator