Camera Phone Problems and Policies

Since the advent of Camera Cell-Phones (and similarly equipped PDAs, as well as mini-digital cameras, all of which will fit in your hand or pocket) to the general public, a new security issue has been created.

Camera Cell-phones cannot be easily distinguished from regular cell-phones and an individual with a camera cell-phone can surreptitiously take pictures in unauthorized or restricted areas of embarrassing or unauthorized subject matter and then instantly transmit the image(s) over the Internet.

While the quality of the pictures is below average, the cell-phone industry is rapidly improving the equipment and this improving technology will lead to sharper and clearer images resulting in higher quality photography. Yet, even with the existing technology, these camera cell-phones have been used in schools to capture and transmit test questions to other cell-phones (& PDAs).

Camera cell-phones can be used to take pictures in bathrooms and locker rooms without a subject’s knowledge or approval. As a result, the possibility of sexual harassment suits in the workplace has risen dramatically because of the risk of inappropriate picture taking.

Camera phones can also be used to capture confidential or company trade secret information. The risk of loss of this proprietary information is in many cases, potentially more damaging than a harassment suit.

Security departments must address these serious issues and once that has been accomplished, could face equally serious public relations problems for its department and for the company. Consideration must now be given to the fact that personal (35mm and video) cameras are already in place restrictions on the use of such cameras. (This article will be published later this year. Please feel free to utilize and distribute within your corporate boundaries.)
given to including camera cell-phones (and mini-digital cameras) in those policies. But because of the miniaturization of these items, and the ability to easily conceal the photo-taking activity, stricter policies must come into play.

With that in mind, the following security policy has been created for discussion purposes only and is not to be considered legal advice.

Date: (Month), 2005

Proposed Policy Change:
Modification of company policy regarding the possession and use of personal cell-phones (and some PDAs) on company property.

Since the advent of “Camera Cell-Phones” (and similarly equipped PDAs) to the general public, a new security issue has also been created.

ABC Company understands and supports individuals’ rights to privacy even when in the workplace. However…

- Camera cell-phones cannot be easily distinguished from regular cell-phones.

- An individual with a camera cell-phone can surreptitiously, or covertly, take pictures of unauthorized or embarrassing subject matter and instantly transmit the image over the Internet.

- Camera cell-phones can be used to take pictures in locker rooms and bathrooms without a subject’s knowledge or approval.

- In the workplace, the possibility for sexual harassment complaints has dramatically risen because of the risk of inappropriate picture taking.
- The possibility of compromising or losing company assets (proprietary Information) is a high risk.

Therefore, it has been decided by ABC Company, that the potential for damages and liability is present. There is similar potential for personal injury to employees and other individuals and finally there is the potential risk of loss of proprietary information and other company assets.

Therefore, it is resolved that the following security policies will be put into effect on __________, 2005.

**Employees:**

1. **All** employees will continue to be permitted to possess cell-phones while on company property but will be encouraged to store cell-phones in a secure place (i.e. locked desk drawer, briefcase, locker, etc.)

   *(Impact: Expect highly negative reaction. Will require a long period of adjustment.)*

2. **All** personal cell-phones of any type are not to be used for any purpose while on company property except in a private office.

   *(Impact: Expect highly negative reaction. Will require a long period of adjustment. Consider PR campaign to re-educate personnel to policy)*

3. Cell-phones are to be kept secured in your pocket, purse, briefcase or belt-clip at all other times.

   *(Impact: Same as above)*

4. Cell-phones are not permitted under any circumstances to be hand-carried or used in company bathrooms or locker rooms.
5. Any individual holding a cell-phone on company property will be subject to challenge by security or in the absence of security personnel, being reported to the HR department. Employees are encouraged to report any individual observed carrying and/or using a cell-phone on company property.
   (Impact: same)

6. Camera cell-phones are never to be used for either of their intended purposes while on company property and are subject to immediate confiscation if it is discovered that this policy is being violated. For employees, this same confiscated equipment can be retrieved from the HR Department at the end of the workday and the violator will be given a reprimand for the violation. Increasingly severe discipline will be administered for subsequent violations.

**Business Visitors / Delivery and Service Persons:**

1. Business invitees shall be notified upon entering the premises that any type of cell-phone must be kept secured in its holder, a briefcase, a pocket/purse or other container at all times.

2. For business visitors/invitees, confiscated camera cell-phones can be retrieved from security.
   (Impact: Same)

Additional steps to enforce policy:

- Posters and other signage should be created and placed in highly visible locations, i.e. in all parking lots/areas, affixed to all entrance/exit doors, displayed in lobbies and elevators. Email announcements should be continuously broadcast to all terminals for a given period of time.

- Require cell-phone inspections by security at beginning of workday.

- Encourage personnel to leave cell-phones in vehicles.

- Visitors who are repeat offenders should be warned that they jeopardize their continued access to the property.
Service-persons and delivery-persons should also be warned that they jeopardize their continued access to the property.

Temporary and contract employees should be given the same notifications and warnings.