



**SECTION 1. TITLE AND SCOPE**

1.1 Title. This ordinance shall be known as "The Naga City Security Enhancement and Privacy Protection Ordinance" or the "**CCTV Ordinance of Naga City.**"

1.2 Scope. This ordinance establishes a graduated, as per Section 3 hereof, risk-based approach to CCTV implementation that balances public safety needs with privacy rights, economic considerations, and implementation capacity.

**SECTION 2. DEFINITIONS.** For purposes of this ordinance, the following terms shall mean:

- 2.1 CCTV System - A closed-circuit television system comprising cameras, recording equipment, storage devices, and monitoring capabilities that capture and retain video and audio within business premises. As used in this ordinance also refers to internet protocol (IP) or digital cameras other than its technical meaning of Closed-Circuit Television camera which is analog in nature. This popular terminology is used in this Ordinance so as to be readily understood by the public.
- 2.2 Data Subject - Any individual whose personal data is processed through CCTV systems, including customers, employees, and visitors.
- 2.3 Personal Data - Any information from which an individual can be identified, including but not limited to facial features, voice recordings, and behavioral patterns.
- 2.4 Business Establishment - Any commercial, industrial, or service enterprise operating within Naga City's territorial jurisdiction that serves the public or employs personnel.
- 2.5 Risk Classification - The categorization of business establishments based on security risk assessment, business size, and public safety impact.
- 2.6 Technical Working Group (TWG) - A multi-stakeholder body composed of PSO representatives, business sector delegates, privacy advocates, and technical experts responsible for implementation guidance.

**SECTION 3. BUSINESS CLASSIFICATIONS AND REQUIREMENTS**

3.1 Risk-Based Classification System. Business establishments are classified into four (4) classes based on security risk assessment, annual revenue, and public safety impact:

*CLASS A - HIGH RISK (Full Compliance Required)*

- Banks, rural banks, and financial institutions
- Pawnshops and money remittance services
- Jewelry stores and precious metals dealers
- Government buildings and public service offices
- Hospitals and major medical facilities;
- Hotels and lodging establishments with 20+ rooms;
- Shopping malls and major retail centers;
- Gasoline stations and fuel distribution facilities;

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*CLASS B - MEDIUM RISK (Standard Compliance)*

Restaurants and food service establishments;  
Convenience stores and grocery stores  
Pharmacies and drug stores;  
Educational institutions (private);  
Internet cafes and gaming establishments;  
Transportation terminals and parking  
facilities; Automotive service centers and  
dealerships Entertainment venues (bars, KTV,  
etc.)

*CLASS C - BASIC RISK (Limited Compliance)*

Small retail stores and specialty shops Beauty  
salons and barbershops Repair shops and  
service centers; Professional offices and  
clinics;  
Small-scale manufacturing facilities;  
Boarding houses and apartelles (20 rooms and  
below);

*CLASS D - MINIMAL RISK (Voluntary Compliance)*

Sari-sari stores and small neighborhood shops  
Home-based businesses;  
Ambulant vendors with fixed locations;  
Agricultural processing facilities  
Cooperative enterprises;

3.2 *Graduated Minimum Requirements by Classification.* The  
minimum requirements according to respective risk classes above  
are as follows:

*CLASS A Requirements:*

Minimum 4-6 cameras with full interior/exterior coverage  
1080p resolution, 30 FPS recording  
45-day storage retention Audio recording capability 24/7  
monitoring capability Backup power supply (UPS)  
Professional installation and maintenance

*CLASS B Requirements:*

Minimum 2-4 cameras covering key areas 720p resolution,  
25 FPS recording  
30-day storage retention Optional audio recording  
Business hours monitoring minimum Backup power supply  
recommended

*CLASS C Requirements:*

Minimum 1-2 cameras covering entrance/transaction areas  
720p resolution, 20 FPS recording  
21-day storage retention  
No audio recording requirement Business hours monitoring

*CLASS D Requirements:*

Voluntary participation  
City-provided technical assistance if desired  
Subsidized equipment through group purchase programs

3.3 *Adjustment of Classifications and Requirements.* The  
Technical Working Group, as created under Section 8.2 of this  
Ordinance, may propose for adjustment, addition, removal, or  
reclassification of business establishments, requirements, or

activities which shall take effect upon public consultation, written approval by the City Mayor, and after due publication thereof.

**SECTION 4. TECHNICAL SPECIFICATIONS**

4.1 *Minimum Camera Standards.* The minimum camera standards regardless of classification are the following:

- a. Digital cameras with minimum specifications appropriate to class
- b. Infrared night vision capability
- c. Weather-resistant housing for outdoor installations
- d. Tamper-proof mounting systems
- e. Time and date stamping

4.2 *Recording and Storage Standards.* Vital to the efficient implementation of this Ordinance is the standards for recording and storage of data which are:

- a. Digital video recording (DVR/NVR) systems
- b. H.264 or H.265 compression (or equivalent/superior)
- c. Automated backup systems
- d. Storage capacity sufficient for retention period
- e. Secure access controls

4.3 *Installation Guidelines.* The installation guidelines for the CCTV systems should include:

- a. Maximum coverage of required areas without blind spots
- b. Compliance with privacy requirements for restrooms/changing areas
- c. Clear visibility of signage requirements
- d. Professional installation certification required for Class A
- e. Self-installation permitted for Class C and D with technical guidance

4.4 *Adjustment of Technical Specifications.* The Technical Working Group may propose for adjustment, addition, removal, or amendment of the technical specifications above-listed which shall take effect upon public consultation, written approval by the City Mayor, and after due publication thereof.

**SECTION 5. PRIVACY PROTECTION FRAMEWORK**

5.1 *Data Privacy Act Compliance.* All CCTV systems must comply with Republic Act 10173 (Data Privacy Act) and National Privacy Commission regulations, including:

5.1.1 *Data Subject Rights Implementation:*

- i) Right to be informed about data collection and processing
- ii) Right to access personal data upon proper request
- iii) Right to correction of inaccurate personal data
- iv) Right to erasure after retention period
- v) Right to data portability when technically feasible
- vi) Right to object to certain processing activities

5.1.2 *Consent and Notice Requirements:*

- i) Conspicuous signage in Filipino and English at all entrances
- ii) Clear privacy policy accessible via QR code or

website

- iii) Notification of data processing purposes and retention periods
- iv) Contact information for privacy complaints and inquiries

5.1.3 *Data Protection Measures:*

- i) Secure storage and transmission of personal data
- ii) Access controls limiting data access to authorized personnel
- iii) Regular security audits and vulnerability assessments
- iv) Data breach notification procedures (within 72 hours)
- v) Staff training on privacy compliance

5.2 *Constitutional Privacy Safeguards*

5.2.1 *Audio Recording Restrictions:*

- i) Audio recording mandatory to Class A establishments only
- ii) Clear notification required for audio recording
- iii) Compliance with Anti-Wiretapping Act (RA 4200)
- iv) Prohibition on recording conversations intended to be private

5.2.2 *Surveillance Limitations.* The following are limitations to surveillance under this Ordinance:

- i) No recording in restrooms, changing areas, or private spaces
- ii) Prohibition on continuous monitoring of employees (except security personnel)
- iii) Restrictions on facial recognition technology without explicit consent
- iv) Limited access to recorded data for legitimate security purposes only

5.3 *Data Retention and Disposal.* It is a declared policy under this Ordinance that the following parameters be observed in data retention and disposal:

- i) Automatic deletion of data after retention period expires
- ii) Secure disposal methods for storage media
- iii) Documentation of data disposal activities
- iv) Extension of retention only upon written court order or official investigation

**SECTION 6. TECHNICAL ASSISTANCE PROGRAM**

6.1. *Technical Assistance Program.* The city government may organize programs for free consultation and system design, installation training for business owners, maintenance and troubleshooting support, and regular system performance assessment.

6.2. *Best Practices.* The City Information Technology Office shall provide stakeholders with regular advices on best practices for the operation and maintenance of CCTV and security systems.

**SECTION 7. PERFORMANCE MONITORING AND EVALUATION**

7.1 *Baseline Data Collection.* The PSO shall establish baseline measurements within 90 days of ordinance effectivity which

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includes crime statistics and business impact metrics.

Crime Statistics include: Monthly crime rates by establishment type and location; Crime clearance rates and investigation timelines; Repeat offense patterns and prevention effectiveness; and Public safety incident reports and response times.

Business Impact Metrics include: Insurance claim frequency and severity; Customer confidence and safety perception surveys; Business revenue and foot traffic patterns; and Employee safety incident reports.

7.2 *Performance Indicators.* Performance indicators serve as a guide in the evaluation, assessment, and decision points of the Technical Working Group and include the following parameters:

7.2.1 Primary Success Metrics:

- a. Crime Reduction Target: 20% reduction in covered areas within 24 months
- b. Clearance Rate Improvement: 90% clearance rate for crimes with video evidence
- c. Prevention Effectiveness: 15% reduction in repeat offenses
- d. System Reliability: 95% uptime for all monitored systems

7.2.2 Secondary Metrics:

- a. Public perception of safety improvements
- b. Business owner satisfaction with program
- c. Tourism and economic development impacts
- d. Emergency response time improvements

7.3 *Monitoring and Review Schedule*

7.3.1 Quarterly Reviews:

- a. Crime statistics analysis and trend identification
- b. System performance and compliance monitoring
- c. Budget utilization and financial assistance effectiveness
- d. Stakeholder feedback collection and analysis

7.3.2 Annual Comprehensive Assessment:

- a. Full cost-benefit analysis of program effectiveness
- b. Public safety impact evaluation
- c. Privacy compliance audit
- d. Stakeholder satisfaction survey

7.3.3 Triennial Strategic Review:

- a. Complete ordinance effectiveness evaluation
- b. Technology update requirements assessment
- c. Legal compliance and constitutional review
- d. Community impact and economic development analysis

**SECTION 8. IMPLEMENTATION FRAMEWORK**

8.1 *Implementing Office.* The Public Safety Office (PSO) shall serve as the primary implementing agency, with the following responsibilities:

8.1.1 Technical Assessment:

- a. System design review and approval

- b. Installation inspection and certification
- c. Periodic compliance monitoring
- d. Technical support and troubleshooting

8.1.2 Administrative Functions:

- a. Business classification and assessment
- b. Financial assistance program administration
- c. Training and capacity building coordination
- d. Performance monitoring and reporting

8.2 *Technical Working Group (TWG)*. A multi-stakeholder Technical Working Group shall be established comprising:

- i) PSO Chief or designated representative (Chairperson)
- ii) City Information and Technology Office (Co-chairperson)
- iii) Business sector representative (Chamber of Commerce)
- iv) A representative from Naga City People's Council
- v) Technical expert (academic or professional)
- vi) City Legal Officer or representative
- vii) PNP City Director or representative
- viii) Barangay representative (Liga ng mga Barangay)
- ix) Such other stakeholders duly appointed by the City Mayor upon endorsement by the TWG.

8.2.1 *TWG Responsibilities*. The following are the responsibilities of the TWG:

- a. Review and update technical specifications
- b. Assess requests for classification changes
- c. Evaluate new technologies and standards
- d. Recommend policy improvements and amendments
- e. Advise on technological updates and transparency and accountability measures

8.3 *Capacity Building Program*. Staff Development shall be pursued as part of the capacity building for the efficient implementation of this Ordinance which includes: Technical training on CCTV systems and assessment; Privacy law compliance and data protection; Customer service and business support; and Performance monitoring and evaluation.

**SECTION 9. ACCESS TO RECORDINGS AND EVIDENCE**

9.1 *Legitimate Access Purposes*. CCTV recordings may be accessed only for the following purposes:

- i) Active criminal investigations with proper authorization;
- ii) Court proceedings with valid subpoena or court order;
- iii) Emergency response and public safety incidents;
- iv) System maintenance and technical troubleshooting; or
- v) Privacy compliance audits and assessments.

9.2 *Access Procedures*.

9.2.1 *Law Enforcement Access*:

- i) Written request specifying incident, time period, and justification;
- ii) Proper identification and authorization documentation;
- iii) Presence of business owner or representative during access;
- iv) Receipt and chain of custody documentation; and

- v) Limitation to specified time periods and locations.

9.2.2 Court-Ordered Access:

- i) Valid subpoena or court order presentation;
- ii) Compliance with judicial requirements and restrictions;
- iii) Legal representation permitted during access; and
- iv) Proper documentation and evidence handling.

9.3 *Prohibited Uses.* The following are prohibited uses of CCTV in pursuance with this Ordinance:

- a. Fishing expeditions or general surveillance without specific cause;
- b. Personal use or entertainment purposes;
- c. Commercial use or distribution without consent;
- d. Discrimination or harassment based on recorded behavior; or
- e. Violation of privacy rights or constitutional protections.

**SECTION 10. PENALTIES AND ENFORCEMENT**

10.1 *Graduated Penalty Structure.* The following shall be the graduated penalty for acts committed by business establishments or any person in violation of this Ordinance:

10.1.1 *First Violation:* A Notice to Comply with 30-day cure period shall be imposed upon the violator. The violator is required to submit written compliance plan with stated timelines.

10.1.2 *Second Violation:* A Fine of: ₱2,500 for Classes A and B; and ₱1,000 for Class C shall be imposed upon the violator. The cure period to comply is 15 days with enhanced technical support, if necessary, from the PSO. The violator shall be subject to probationary compliance monitoring for not more than three (3) months.

10.1.3 *Third Violation:* A Fine of: ₱5,000 for Classes A and B; and ₱2,500 for Class C shall be imposed upon the violator. Likewise, a business permit suspension proceedings shall be initiated against the violator.

10.2 *Mitigating Factors.* The following are considered mitigating factors that may be taken into consideration in the imposition of penalty or citation of violation against the violator.

- i) Good faith compliance efforts
- ii) Financial hardship documentation
- iii) Technical difficulties beyond business control
- iv) Participation in voluntary compliance programs
- v) Cooperation with enforcement activities

10.3 *Aggravating Factors.* The following are aggravating factors that may be taken against the violator:

- i) Deliberate non-compliance or system tampering
- ii) Obstruction of inspection or monitoring activities
- iii) Violation of privacy requirements

- iv) Use of systems for unauthorized purposes
- v) Repeated violations despite assistance

10.4 *Suspension, revocation, and non-renewal of business permit.* Any person or institution found to be in violation of this Ordinance for the third time may have its business permit suspended or revoked or suffer non-renewal of permit until compliance to this Ordinance is made.

#### **SECTION 11. APPEAL PROCESS**

11.1 *Right to Appeal.* Any business establishment found in violation may appeal PSO findings to the Office of the City Mayor within fifteen (15) working days from notification.

11.2 *Appeal Procedures.*

11.2.1 *Filing Requirements:*

- i) Written sworn appeal with specific grounds and supporting evidence
- ii) Payment of appeal fee (₱500, waived for financial hardship cases)
- iii) A copy of the appeal shall be furnished to PSO within 24 hours of filing
- iv) Supporting documentation and witness affidavits should be attached.

11.2.2 *PSO Response.* The Public Safety Office thru its head may file its comment to the appeal within ten (10) working days upon receipt thereof. The comment may include a technical assessment report and supported by evidence, recommendation for appeal resolution, or opportunity for settlement discussion.

11.3 *Appeal Review Process*

11.3.1 *Hearing Officer:* A hearing officer who is the City Legal Officer or its duly appointed representative shall review the appeal and conduct hearing and evaluate evidence. The hearing officer shall issue a written recommendation to City Mayor within 15 days from the last hearing thereof.

11.3.2 *Final Decision.* The City Mayor shall render decision within ten (10) working days after submission of the recommendation of the hearing officer. The City Mayor is not bound by the recommendation which serves only as guide or suggestion.

#### **SECTION 12. COMPLIANCE TIMELINE AND IMPLEMENTATION**

12.1. *Compliance Deadlines to be observed, unless extension is justified:*

- Class A: 45 days from expiration of transition period;
- Class B: 30 days from expiration of transition period;
- Class C: upon expiration of transition period;
- Class D: Voluntary participation (no deadline).

12.2. *Extension Provisions.* An extension of 30-days shall be granted either individually or across the board should a force majeure event occur or under extraordinary circumstances beyond the control of the city government or the stakeholders. Good faith

compliance efforts by business establishments shall be taken into consideration in granting extension individually.

**SECTION 13. BUDGET AND FUNDING.** The funds necessary for the efficient implementation of this Ordinance, including but not limited to logistical support and operational expenses for the inspection, stakeholder education, information dissemination, and reportorial activities, shall be sourced from a separate budgetary allocation for the Public Safety OFFICE and the Information and Technology Office.

**SECTION 14. PARTNERSHIP AND COORDINATION**

14.1 An Inter-Agency Coordination effort shall be made between and among the following:

- i) Philippine National Police: Crime investigation and evidence sharing
- ii) Bureau of Fire Protection: Emergency response coordination
- iii) Department of Trade and Industry: Business support and development
- iv) Technical Education and Skills Development Authority: Training programs
- v) National Privacy Commission: Privacy compliance guidance

14.2 Academic and Professional Partnerships shall be forged among the academic institutions and professional organizations or international organizations regarding technical standards and best practices and capacity building.

**SECTION 15. EMERGENCY PROVISIONS**

15.1 *Compliance Suspension during Emergencies.* In cases of natural disasters, public health emergencies, or other extraordinary circumstances, the City Mayor may temporarily suspend compliance requirements upon recommendation of the PSO.

15.2 The following emergency access protocols shall be observed during emergencies: Expedited access to recordings for emergency response; Temporary relaxation of privacy restrictions for public safety; Coordination with disaster response agencies; and Post-emergency compliance restoration procedures or such other protocols as may be determined by the TWG.

**SECTION 16. SEPARABILITY CLAUSE.** If any provision of this ordinance is declared invalid or unconstitutional, the remaining provisions shall continue to be in full force and effect, provided that the ordinance can still achieve its essential purposes.

**SECTION 17. REPEALING CLAUSE.** All ordinances, rules, and regulations inconsistent with this ordinance are hereby repealed or modified accordingly. However, rights vested and obligations incurred under previous regulations shall be respected during the transition period.

**SECTION 18. EFFECTIVITY.** This ordinance shall take effect fifteen (15) days after its publication in a newspaper of general circulation in Naga City and compliance with all legal requirements.

**SECTION 19. TRANSITION PERIOD.** A six (6) month transition period upon effectivity shall be observed during which:

- i) Businesses shall prepare, install the required CCTVs,

- and comply to this Ordinance;
- ii) Existing surveillance systems that are non-compliant may continue operation;
  - iii) Businesses may seek compliance guidance without penalty; and
  - iv) PSO capacity building shall be completed.

**SECTION 20. GRANDFATHER CLAUSE.** Existing CCTV systems that substantially comply with this ordinance's requirements may be grandfathered for up to two (2) years, subject to annual compliance review and necessary upgrades.


ENACTED: October 28, 2025


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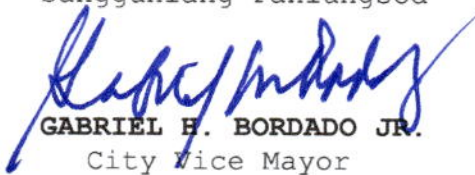
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**WE HEREBY CERTIFY** to the correctness of the foregoing ordinance.

  
**GIL A. DE LA TORRE**  
Secretary to the  
Sangguniang Panlungsod

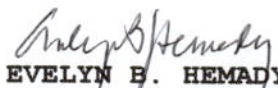
  
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