

Department Policy & Procedure

Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes.

1. Purpose

The purpose of this policy is to regulate the use of closed circuit television (CCTV) cameras to monitor and record public areas for the purposes of safety and security.

2. Scope

This policy applies to all Security personnel, and property of the College in the use of CCTV monitoring and recording. Legitimate uses of this technology are covered by College policies governing the proper use and restrictions of this technology.

3. General Principles

- A. The Department of Public Safety and Security, under the guidance of the Department of Facilities Management, is committed to enhancing the quality of life of the campus community by integrating the best practices of private Public Safety with state-of-the-art technology. A critical component of a comprehensive security plan using state-of-the-art technology is closed circuit television (CCTV).
- B. The purpose of CCTV monitoring of public areas by Public Safety personnel is to deter crime and to assist the Public Safety and Security Department in protecting the safety and property of the College community. Any diversion of security technologies and personnel for other purposes (e.g., CCTV monitoring of political or religious activities, or employee and/or student evaluations) would undermine the acceptability of these resources for critical safety goals and is therefore prohibited by this policy.
- C. Video monitoring for security purposes will be conducted in a professional, ethical and legal manner. Personnel involved in video monitoring will be appropriately trained and continuously supervised in the responsible use of this technology. Violations of the Code of Procedures for video policy referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of the College.
- D. Information obtained through video monitoring will be used exclusively for security and law enforcement purposes. Information obtained through video monitoring will only be released when authorized by the Dean of Students, College Legal Counsel and appropriate administrative personnel according to the procedures established in this policy.
- E. Video monitoring of public areas for security purposes will be conducted in a manner consistent with all existing College policies, including the Non-Discrimination Policy, the Sexual Harassment policy, Open Expression Guidelines and other relevant policies. The Code of Practice for video monitoring

- prohibits monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability etc.)
- F. Video monitoring of public areas for security purposes at the College is limited to uses that do not violate the reasonable expectation of privacy as defined by law.
 - G. To maintain an informed College community, the Department of Public Safety and Security will periodically disseminate written materials describing the purpose and location of CCTV monitoring and the guidelines for its use.
 - H. Information obtained in violation of this policy may not be used in a disciplinary proceeding against a member of the College faculty, staff or student body.
 - I. Under no circumstances will the Department of Safety and Security use the CCTV system to monitor Staff, Faculty or Student work behavior unless there is a legitimate investigation pertaining to conduct contrary to the law, Student Code of Conduct or College Policy. Any such monitoring or review must be accompanied by a written complaint, report, memo, email or any correspondence as to the nature, scope and level of action to be taken. All request/action and/or review must be made through the Security Manager or his/her designee. The Security manager will seek guidance from all available sources including Human Resources as a measure to not violate College Personnel's rights in the workplace.
 - J. All existing uses of video monitoring and recording will be brought into compliance with this policy within twelve months of the approval of this policy.

4. Responsibilities

- A. The Department of Public Safety and Security is the department authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at the College. Public Safety has primary responsibility for disseminating and implementing policy and procedures.
- B. The Vice President of Planning and Finance has the responsibility to authorize all CCTV monitoring for safety and security purposes at the College. All new installations will follow the Department of Public Safety and Security operating principles. All existing CCTV monitoring systems will be evaluated for compliance with this policy.
- C. The Department of Public Safety and Security will monitor new developments in the relevant law and in security industry practices to ensure that CCTV monitoring at the College is consistent with the highest standards and protections.
- D. The Security Manager will assure that the Public Safety and Security Department adheres to established policy and procedure in the use of CCTV and to review camera locations and request for release of video media.
 - 1. The Security Manager will review camera locations to insure the perimeter of view of fixed location cameras conforms to this policy. The proposed location of permanent CCTV cameras will be provided to the Security Manager for review before installation. The locations of temporary cameras to be used for special events will be reviewed by the Security Manager for approval before the event if possible. (Note: "Temporary cameras" does not include mobile video equipment or hidden surveillance cameras used for criminal/policy investigations.) Included with the list of CCTV camera locations will be a general description of the technology employed and the capabilities of the cameras. Students and staff entering

certain sensitive locations on campus may have an increased concern for privacy and confidentiality. In order to prevent a possible chilling effect on the use of service at these locations, concerned persons may petition the Security Manager to forgo the installation of a proposed camera or for the removal of an existing camera. The Security Manager will determine the appropriateness of an installation weighing the concerns of the person(s) making the request and the safety and security of the entire community. In recognizing students may also have an enhanced expectation of privacy in study areas and lounges of the facilities, CCTV monitoring for safety and security purposes will not be used in lounges, study areas and student offices unless there is a specific Safety need for installation. The Security Manager will review complaints regarding camera locations and determine whether the CCTV monitoring policy is being followed. The Manager should weigh whether the potential increment in community security outweighs any likely infringement of individual privacy.

2. The Security Manager, with the college legal counsel, the Office of Government Relations and the Vice President of Planning and Finance will review all requests received by the Department of Public Safety to release recordings obtained through CCTV monitoring. No releases of CCTV recordings will occur without authorization by the College Legal Counsel, The office of Government relations, The Vice President of Finance and Planning and the Manager of Security. Excluded from review by the Manager of Security are releases of tapes, Digital images and digital video directly related to a criminal investigation, arrest or subpoena. The Security Manager may also approve release of CCTV tapes only for legitimate purposes, such as to protect the College and its members from lawsuits or harm. Any release of tapes will be recorded on a written log with a written Security Report addressing the release.
3. The Security Manager may audit the Department of Public Safety and Security's CCTV monitoring operations, including video media storage, at any time without prior notice.
4. The Vice President of Finance and Planning will report to the President's office at least three times per year describing all requests for camera locations and release of video media and disposition of those requests.
5. The Security Manager will review this policy annually and recommend revisions if needed.

5. Procedures

- A. All operators and supervisors involved in video monitoring of public areas will perform their duties in accordance with the Code of Practice consistent with this policy developed by the Department of Public Safety and Security.
- B. Department of Public Safety and Security management will assure that responsible and proper camera monitoring practices by control operators is continuous.
- C. The Department of Public Safety and Security will post signage at appropriate locations. Signage will state that the area is protected by video surveillance.

- D. The Department of Public Safety and Security will limit camera positions and views of areas which may be considered private (i.e. offices work stations bathrooms, locker rooms). Any view given to “private areas” will be no greater than what is available with unaided vision. Furthermore, the view of a residential housing around campus, offices, work stations, class rooms, lab areas, bathrooms, locker rooms must not violate the standard of “reasonable expectation of privacy.”
- E. The Department of Public Safety and Security Operations office will be configured to prevent camera operators tampering with or duplicating recorded information.
- F. Recorded video media will be stored for a period not to exceed 30 days and will then be erased, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Dean of Students, Vice President of Planning and Finance and the Security Manager.
- G. Video media will be stored in a secure location with access by authorized personnel only.
- H. Security Specialist will conduct video observation of areas only in plain view of others situated in the public area viewable to the public.
- I. Security Specialist will be trained in the technical, legal and ethical parameters of appropriate camera use.
 - 1. Security Specialist will receive a copy of this policy and provide written acknowledgement that they have read and understood its content.
 - 2. Security Specialist will receive training in cultural/diversity awareness.
- J. Security Specialist will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability or other classification protected by the College Non-Discrimination policy. Camera control operators will monitor based on suspicious behavior, not individual characteristics.
- K. Mobile or portable video equipment may be used in criminal investigations, this equipment will only be used in non-criminal investigations where there is significant risk to public safety, security and property as authorized by the Manager of Security.

Examples of Video Monitoring and Recording of Public Areas

Legitimate safety and security purposes include, but are not limited to the following:

- Protection of buildings and property*
- Monitoring of Access Control systems*
- Verification of security alarms*
- Video patrol of public areas*
- Criminal investigation*
- Protection of pedestrians*