

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 reasons of safety and security and in the investigation of incidents that occur on campus.

2. Scope

This policy applies to all personnel and property of the College in the use of CCTV monitoring and recording. This policy does not include the use of video equipment for recording of public performances or events, interviews, or other use for broadcast or educational purposes. Examples of such excluded activities would include the videotaping of athletic events for post-game review, videotaping of concerts, plays, and lectures, etc.

3. General Principles

- A. The Department of Public Safety (DPS), under the guidance of the Division of Student Life, is committed to enhancing the quality of life of the campus community by integrating the best practices of private campus 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 campus safety personnel is to deter crime and to assist the DPS 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 any activity protected by the Constitution, monitoring based on race, gender, sexual orientation, national origin, disability, etc.) 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 will result in disciplinary action consistent with the rules and regulations governing employees and student workers of the College.
- D. Information obtained through video monitoring will be used exclusively for security, safety, law enforcement purposes and in approved instances for educational purposes only. Information obtained through video monitoring will only be released when authorized by the 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. 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.
- F. 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.
- G. Under no circumstances will the DPS 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 or College policy. All requests/action and/or review must be made through the Director of Public Safety. The director will seek guidance from all available sources including Human Resources and College Legal Counsel as a measure to not violate the workplace rights of College personnel.

- H. All existing uses of video monitoring and recording will be brought into compliance with this policy within six months of policy approval by the Administrative Committee. Any existing CCTV equipment that has not been installed or approved by the DPS will become DPS property within six months of approval of this policy. Any existing CCTV information to include camera locations, digital video recorder locations, existing stored data, serial and model numbers and any other information requested by the DPS to provide an orderly transition to policy implementation will be provided to DPS within thirty days of the adoption of this policy.
- I. Faculty, staff and students should understand that the presence of CCTV does not insure complete protection against a criminal act nor does it mean that every CCTV location is monitored at all times.

4. Responsibilities

- A. The DPS is the department authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at the College. No CCTV equipment for use under the scope of this policy will be purchased by any College personnel once this policy is adopted by the Administrative Committee. The DPS has primary responsibility for disseminating and implementing policy and procedures.
- B. The Department of Information Systems and Services is the responsible party for storage of video data obtained through CCTV, although digital video recorders may be utilized in various locations across College property and are the responsibility of the DPS.
- C. The Vice President of Student Life has the responsibility to authorize all CCTV monitoring for safety and security purposes at the College. All new installations will follow DPS operating principles. All existing CCTV monitoring systems will be evaluated for compliance with this policy.
- D. The DPS will monitor new developments in relevant law and in security industry practices to ensure that CCTV monitoring at the College is consistent with the highest standards and protections.
- E. The Director of Public Safety will assure that the DPS adheres to established policy and procedure in the use of CCTV and to review camera locations and requests for release of video data.
 - 1. The Director of Public Safety 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 Director of Public Safety for review before installation. The locations of temporary cameras to be used for special events will be reviewed by the Director of Public Safety for approval before the event if possible. (Note: "Temporary cameras" does not include mobile video equipment or concealed surveillance cameras used for criminal/policy investigations.)
 - 2. The Director of Public Safety along with the College Legal Counsel will review all requests received by the DPS to release recordings obtained through CCTV monitoring. No releases of CCTV recordings will occur without authorization by the College Legal Counsel, The Vice President of Student Life and the Director of Public Safety. Excluded from review are releases of tapes, digital images and digital video directly related to a criminal investigation, arrest or subpoena.
 - 3. The Director of Public Safety will review this policy annually and recommend revisions if needed.

5. Procedures

- A. All personnel involved in video monitoring of public areas will perform their duties consistent with this policy.
- B. The Director of Public Safety will assure that responsible and proper camera monitoring practices by those viewing monitors is as continuous as is practical.
- C. The DPS will post signage at appropriate locations stating that the area is protected by video surveillance.
- D. The DPS will limit camera positions and views of areas which may be considered private (i.e. office work stations, bathrooms, locker rooms). In the case of an investigation considered critical to College safety and security private areas could be monitored but only after approval by the Director of Public Safety, College Legal Counsel and the Vice-President of Student Life.
- E. The DPS 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 Vice President of Student Life and the Director of Public Safety.
- G. Video media will be stored in a secure location with access by authorized personnel only.
- H. DPS personnel will conduct video observation of areas only in plain view of others situated in the public area viewable to the public (except as referenced above).
- I. DPS personnel will be trained in the technical, legal and ethical parameters of appropriate camera use and observation of activity. Public Safety personnel will receive a copy of this policy and provide written acknowledgement that they have read and understand the content.
- J. DPS personnel will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability or any other class protected by the College Non-Discrimination Policy. Personnel will monitor based on suspicious behavior, not individual characteristics.
- K. Mobile or portable video equipment may be used in criminal investigations and other investigations as determined by the Director of Public Safety in consultation with the Vice-President of Student Life, the Director of Human Resources (if involving staff or faculty) and the College Legal Counsel. In case of the need for an immediate investigatory response or a situation in which there is significant risk to public safety, security and property, a mobile or portable device may be placed, however the Director of Public Safety will inform the Vice-President of Student Life as soon as is practical.