



GUIDELINES FOR

**SECURITY CAMERA MONITORING AND
RECORDING OF PUBLIC AREAS**

Revised February 28, 2014

I. PURPOSE

The purpose of these guidelines is to regulate the use of security cameras to monitor and record public areas for the purpose of safety and security.

II. SCOPE

These guidelines apply to all personnel departments at the College in the use of security camera monitoring and recording. Legitimate use of this type of technology related to teaching or public relations is excluded from these guidelines.

III. GENERAL PRINCIPLES

- A.** The Department of Public Safety is committed to enhancing the quality of life of the campus community by integrating the best practices and industry standards with state of the art technology. A critical component of a comprehensive security plan using state of the art technology is the use of security cameras.
- B.** The use of security cameras in public areas is to deter crime and to assist the Department of Public Safety in protecting the persons and property of the College community. Any diversion of security technologies and personnel for other purposes (i.e., 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 these guidelines.
- C.** Camera recording and/or monitoring¹ for security purposes will be conducted in a professional, ethical and legal manner. Personnel involved in security camera recording and monitoring will be appropriately trained and supervised in the responsible use of this technology. Violations for security camera monitoring and/or recording referenced in this policy will result in disciplinary action consistent with policies and handbooks governing employees of the College.
- D.** Information obtained through the use of security cameras will be used exclusively for safety and security purposes. Information may be used in criminal investigations, and will only be used in non-criminal investigations in specific instances posing a significant risk to public safety, security, and property. Information obtained will only be released when authorized by the Director of Public Safety after consultation with the Emergency Response Recovery and Planning (ERRP) Team.
- E.** The monitoring and recording of security cameras in public areas will be conducted in a manner consistent with all existing College policies, including the Non-Discrimination Policy, the Sexual Harassment Policy and other relevant policies. This policy prohibits the use of recording or monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (i.e., race, gender, sexual orientation, national origin, disability, etc.).

¹

For the purpose of these guidelines; monitoring will be considered the viewing of either live or recorded video images.

- F. The use of security cameras in public places at the College is limited to uses that do not violate a reasonable expectation of privacy².
- G. To maintain an informed College community, the Department of Public Safety will maintain and have available for review information describing the purpose and location of permanent security cameras and these guidelines for their use.

IV. RESPONSIBILITIES

- A. The Earlham College Department of Public Safety (DPS) is the department authorized to oversee and coordinate the use of security cameras at the College. Any College office or department requesting or utilizing security cameras must coordinate their installation and use through DPS and are responsible for implementing this policy in their respective operations. DPS has primary responsibility for disseminating this policy and assisting other departments or offices in implementing the policy and procedures.
- B. The Director of Public Safety has the responsibility to authorize the use of cameras for safety and security purposes at the College. All new installations will follow the operating principles outlined in this plan.
- C. The Director of Public Safety will monitor new developments in the relevant law and in security industry practices to ensure the security camera use at the College is consistent with the highest standards and protections.
- D. The Earlham Emergency Response Recovery and Planning (ERRP) Team has been designated by the College president to assure that the DPS adheres to established guidelines in the use of security cameras and to review camera locations and requested release of recorded video images.
 - 1. ERRP will review camera locations to ensure that the view from public cameras conform to these guidelines³.

The proposed location of permanent security cameras as well as a general description of the technology employed and the capabilities of the camera(s) will be provided to ERRP for review before installation.

The locations of temporary cameras to be used for special events will be reviewed by ERRP for approval before the event(s) if possible.

Note: Temporary cameras do not include covert video equipment or hidden surveillance cameras used for criminal investigations.

It is understood that students and employees may have a concern for privacy or confidentiality over the use of security cameras at certain locations. Concerned persons may make written requests through ERRP to forgo the installation of a proposed camera (to include removal or realignment of an existing camera). ERRP will determine the

²

A reasonable expectation of privacy exists if 1) you actually expect privacy, and 2) your expectation is one that society as a whole would think is legitimate.

³

Excluded from ERRP review is the location of any temporary cameras that may be used as part of an on-going criminal investigation.

appropriateness of the 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 enhanced expectations of privacy in the hallways and lounges of residential buildings, security camera monitoring for safety and security purposes will not be used in residential hallways and lounges unless the Director of Public Safety, in consultation with the VP of Student Development and Associate Dean of Students determines a specific safety and/or security risk exists.

ERRP will review complaints regarding camera locations and determine whether the Security Camera Monitoring and Recording Guidelines are being followed. The committee should weigh whether the potential increment in community security outweighs any likely infringement of individual privacy.

2. ERRP, with the Director of Public Safety, will review all requests received by the Department of Public Safety to release recorded video images obtained through security camera monitoring. No releases of recorded video images will occur without authorization by the Director and ERRP. ERRP may also approve release of recorded video images for legitimate purposes, such as campus judicial proceedings and to protect the College and its members from harm or liability. Excluded from review by ERRP are releases of recorded video images directly related to a criminal investigation, arrest or subpoena.

A record of any release of recorded video images will be retained.

3. ERRP will review these guidelines annually and recommend revisions if needed.

V. PROCEDURES

- A.** All employees involved in the installation, operation and maintenance of security camera systems will perform their duties in accordance with policies and procedures consistent with these guidelines.
- B.** DPS supervisors will assure that responsible and proper camera monitoring practices by employees is maintained.
- C.** DPS will post signage at building entrances in which security cameras are in use.
- D.** The DPS will limit camera positions and views of residential housing. Any view given to the housing will be no greater than what is available with unaided vision. Furthermore the view of a residential housing facility must not violate the standard of "reasonable expectation of privacy."
- E.** The DPS monitoring equipment (and any other monitoring equipment) will be configured to prevent tampering with or duplicating recorded video information.
- F.** Recorded video images will be stored for a temporary basis and will then be erased, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use.
- G.** Recorded video images will typically be stored on secure campus servers with access by authorized DPS personnel only. Images are recorded over the oldest image as the hard drive

become full. Servers are capable of storing images for approximately 60 days, depending on the amount of recording taking place.

- H. Security cameras generally will not be monitored in real time. The primary use of security cameras will be to record events that can later be reviewed by DPS to follow-up on reported incidents. The secondary use will be to enhance safety and security by allowing DPS to periodically check on or remotely patrol a specific area⁴.
- I. The use of audio recording with any security camera system on campus is prohibited.
- J. Temporary covert or mobile video equipment may be used in criminal investigations; typically those posing a significant risk to public safety, security, and property. Video of this nature may be monitored in real time or through recorded events, depending on the specific nature of the investigation. Covert or mobile video must be authorized in writing by the Director of Public Safety and the VP of Finance.

EXAMPLES OF SECURITY CAMERA MONITORING AND RECORDING OF PUBLIC AREAS

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

Protection of buildings and property

Building perimeters, entrances and exits, lobbies and corridors, receiving docks, laboratories, cashier locations, etc.

Monitoring of Access Control Systems

Monitor and record restricted access activities at entrances to buildings and other areas.

Verification of security alarms

Intrusion alarms, exit door controls, panic alarms

Video Patrol of Public Areas

Parking lots, public streets and vehicle intersections, athletic fields, etc.

Criminal Investigation

Robbery, burglary, and theft surveillance

Protection of pedestrians

Monitoring of pedestrian and vehicle traffic activity

Protection of restricted areas (these areas are not considered public areas)

Utility tunnels, building mechanical and electrical vaults, maintenance shops, special storage rooms, roof tops, etc.

⁴ Restricted areas posing a safety threat may be viewed on a live basis to prevent unauthorized entry (i.e.: tunnels, roofs, etc.).