

# **College of the Holy Cross**

## **Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes, and Privacy Protocols**

### **I. 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.

### **II. Scope**

This policy on the use of CCTV monitoring and recording applies to all personnel on campus.

### **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 of public and private policing within 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 security personnel is to deter crime and to assist the campus police in protecting the safety and property of the campus 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 monitoring referenced in the policy will result in disciplinary action consistent with the rules and regulations governing employees of the campus.
- 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 Director of Public Safety 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 campus policies, including the Non-Discrimination Policy, the Sexual Harassment Policy, 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 campus is limited to uses that do not violate the reasonable expectation of privacy as defined by law.
- G. To maintain an informed campus community, Public Safety will periodically disseminate written materials describing the purpose and location of CCTV monitoring and the guidelines for its use. The location of outdoor CCTV cameras monitored by Public Safety will be published in the Student Handbook.
- H. Information obtained in violation of this policy may not be used in a disciplinary proceeding against a member of the campus faculty, staff, or student body.
- I. All existing uses of video monitoring and recording will be brought into compliance with this policy within twelve (12) months of the approval of this policy.

#### **IV. Responsibilities**

- A. Public Safety is the department authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at the campus. All campus areas using CCTV monitoring are responsible for implementing this policy in their respective operations. Public Safety has primary responsibility for disseminating the policy and assisting other units in implementing the policy and procedures.
- B. The Dean of Student Affairs and the Public Safety Director have the responsibility to authorize all CCTV monitoring for safety and security purposes at the campus. All new installations will follow Public Safety operating principles. All existing CCTV monitoring systems will be evaluated for compliance with this policy.
- C. Public Safety will monitor new developments in the relevant law and in security industry practices to ensure that CCTV monitoring at the campus is consistent with the highest standards and protections.

- D. A list of all campus owned and controlled camera locations will be made available by Public Safety to any member of the campus community requesting the list. Included with the published list of CCTV camera locations will be a general description of the technology employed and the capabilities of the cameras.
- E. A CCTV Monitoring Panel shall be established to assure that Public Safety adheres to established policy and procedure in the use of CCTV and to review both camera locations and requests for release of tapes.
1. The CCTV Monitoring Panel shall consist of members who will serve for a term of one year and shall include:
    - a. The Public Safety Director or his/her designee will serve as Chairperson
    - b. A faculty member appointed by the Chairperson
    - c. A student member of the student government
    - d. A designee of Information Technology Services
    - e. A designee of Physical Plant electrical shop.
  2. The CCTV Monitoring Panel will review camera locations to ensure the parameter of view of fixed location cameras conform to this policy.
  3. The proposed location of any new permanent CCTV cameras will be provided to the CCTV Monitoring Panel for review and published in the student newspaper and on the Public Safety website before installation.
  4. The locations of temporary cameras to be used for special events will be reviewed by the CCTV Monitoring Panel for approval and published in the student newspaper and on the Public Safety website before the event, if possible and time permits.  
*(Note: "Temporary cameras" do not include mobile video equipment or hidden surveillance cameras used for criminal investigations.)*
  5. Students and staff entering certain sensitive locations on campus may have an increased concern for privacy or confidentiality. In order to prevent a possible chilling effect on the use of service at these locations, concerned persons may petition the CCTV Monitoring Panel to forgo the installation of a proposed camera or for the removal of an existing camera. The CCTV Monitoring Panel will determine the appropriateness of an installation,

weighing the concerns of the person(s) making the requests against the safety and security needs of the entire community.

6. Students may also have an enhanced expectation of privacy in the hallways and lounges of residence facilities. CCTV monitoring for safety and security purposes will be used in residential hallways and lounges only after the Vice President of Student Affairs or Public Safety determines that a specific safety/security risk exists and the CCTV Monitoring Panel approves it.
7. The CCTV Monitoring Panel will review complaints regarding camera locations and determine whether the CCTV Monitoring Policy is being followed. The panel should weigh whether the potential increase in community security outweighs any likely infringement of individual privacy.
8. The CCTV Monitoring Panel will review all requests received and acted upon by Public Safety to release recordings obtained through CCTV monitoring. Excluded from review by the CCTV Monitoring Panel are releases of tapes directly related to a criminal investigation, arrest, or subpoena. **Any release of tapes will be recorded in a written log.**
9. Any member of the CCTV Monitoring Panel may audit Public Safety's CCTV monitoring operations, including videotape storage, at any time without prior notice.
10. The Chairperson of the CCTV Monitoring Panel will report to the Campus Safety Committee or Committee of Campus Directors at least four (4) times per year describing all requests for camera locations and release of tapes and disposition of those requests.
11. The CCTV Monitoring Panel will review this policy annually and recommend revisions if needed.

## **V. Procedures**

- A. All operators and supervisors involved in the video monitoring of public areas will perform their duties in accordance with the Code of Practice consistent with this policy developed by Public Safety.
- B. Public Safety will have signs installed at appropriate locations. Signs shall state, "This Area is Subject to Video Monitoring by the Campus Police".
- C. Public Safety 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".

- D. Public Safety Central Monitoring Center and other central monitoring centers will be configured to prevent camera operators from tampering with or duplicating recorded information.
- E. Recorded video will be stored for a period not to exceed 90 days and will then be erased, unless retained as part of a criminal investigation or court proceeding (criminal or civil) or other bona fide use as approved by the Public Safety Director. Video will be stored in a secure location with access by authorized personnel only.
- F. Camera control operators will conduct video observation of areas only in plain view of others situated in the public area viewable to the public.
- G. Camera control operators will be trained in the technical, legal, and ethical parameters of appropriate camera use. Camera control operators will receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.
- H. Camera control operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the campus's Non-Discrimination Policy. Camera control operators will monitor based on suspicious behavior, not individual characteristics.
- I. Camera control operators will not spot and continuously view people becoming intimate in public areas. Camera control operators will not view private rooms or areas through windows.
- J. Mobile video equipment may be used in criminal investigations. Campus police officers will only use portable hidden cameras with recording equipment for criminal investigation with the approval of the Director of Public Safety.

## **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***

Building perimeter, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, cashier locations, etc.

### ***Monitoring of Access Control Systems***

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

### ***Verification of security alarms***

Intrusion alarms, exit door controls, hold-up alarms

### ***Video Patrol of Public Areas***

Transit stops, parking lots, public streets (enclosed and unenclosed), shopping areas and vehicle intersections, etc.

### ***Criminal Investigation***

Robbery, burglary, and theft surveillance

### ***Protection of pedestrians***

Monitoring of pedestrian and vehicle traffic activity

## **VI. Operations Center**

- A. No person, other than the system administrator, authorized person, or the company providing service shall make or attempt to make changes to the system settings. This includes but is not limited to IP addresses or other settings outside the normal user guidelines. Violators of this provision will face disciplinary action.
- B. Any defects of the cameras or the system itself will be documented through a police log entry and forwarded to Information Technology Services (ITS).
- C. Unless directed to do so, no user will attempt to access archived video. Only recent video (recorded during the current shift) may be accessed.
- D. Unless there is a major system failure, service calls after hours are not necessary. Arrangements for repairs will be made on the first business day after notification via documentation.
- E. System users are not authorized to call in a vendor without first making the proper notifications and obtaining authorization.

**The CCTV system will be used as a resource to detect, investigate, and record activity that violates campus regulations and state or federal laws. Any other use of the system is prohibited and violators face serious disciplinary action.**