

CITATION REFERENCE

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Video Surveillance Policy

Policy Statement

The College of Coastal Georgia is committed to the enhancement of public safety, the quality of life, and the maintenance of an environment conducive to quality education, individual privacy, diversity, and freedom of expression.

Accordingly, the College is using closed-circuit television (CCTV) to monitor public areas in order to deter crime and assist the College of Coastal Georgia Police Department (CCGPD) in providing for the security and safety of individuals and property that are part of the College community.

Any diversion of security technologies for purposes other than those listed in this policy would undermine the acceptability of these resources for critical safety goals and is therefore strictly prohibited.

The CCGPD shall not collect or maintain information about members of the College community (faculty, staff or students), except in connection with alleged crimes, violations of College regulations, or as specifically authorized in writing by the President.

Reason for Policy

The purpose of this policy is to provide guidelines for the use of CCTV on College property in a way that enhances security, while at the same time respects the expectation of reasonable privacy among members of the community.

Further, this policy is intended to formalize procedures for the installation, monitoring, store, dissemination and destruction of surveillance records.

The existence of this policy does not imply or guarantee that cameras will be monitored in real time 24 hours a day, seven days a week.

Entities Affected By This Policy

All faculty, staff, students of the College of Coastal Georgia, as well as visitors to the College, are covered by this policy.

Who Should Read This Policy

All faculty, staff, and students of the College should be aware of this policy.

Contacts

| Contact | Phone | E-Mail/URL |
|------------------------|----------------|--|
| Chief Bryan Sipe | (912) 279-5819 | bsipe@ccga.edu |
| Geri Chapman Culbreath | (912) 279-5760 | gculbreath@ccga.edu |

Website Address For This Policy

www.ccgga.edu/PublicSafety

Related Documents

None

Definitions

These definitions apply to these terms as they are used in this policy:

- a. *CCTV*: Closed circuit is a technology that can be used to remotely monitor and record activity across the College campus.
- b. *Public Area*: An area open for public use where the expectation of privacy is not violated by what could normally be openly observed, such as the campus grounds, an academic hallway, classroom, library, or study rooms.
- c. *Private Area*. Areas where an individual might change clothing, such as bathrooms, shower areas, locker and changing rooms. This would also typically include private office spaces; however, exceptions are appropriate in those areas where monetary transactions occur or where the use of CCTV is needed to safeguard money or supplies from theft, destruction or tampering.
- d. *Video Surveillance Technology*: Any item, system, camera, technology device, communications device, or process, used along or in conjunction with a network, for the purpose of gathering, monitoring, recording, or storing an image or images of College facilities and/or people in College facilities. Images captured by video surveillance technology may be real-time or preserved for review at a later date. CCTV is one form of video surveillance technology.

Overview

The College of Coastal Georgia recognizes the need to strike a balance between the individual's right to be free from invasion of privacy and the institution's duty to promote a safe environment for all community members. In light of this recognition, the College will use CCTV to enhance security, safety and the quality of life of the campus community by integrating the best practices of "virtual policing" with state-of-the-art technology. CCTV technology will extend the protection of the CCGPD, even when law enforcement officers are not in the immediate area. And, while not a guarantee of safety, CCTV is a tool that can be used to assist CCGPD personnel.

The purpose of CCTV surveillance at the College is three-fold: First, to promote a safe environment by deterring acts of harassment or assault; second, to deter theft and vandalism and assist in the identification of individuals who commit damage to College property; and third, to assist law enforcement agencies with regard to the investigation of any crime that may be depicted.

Video monitoring for security purposes will be conducted in a professional, ethical and legal manner. Personnel involved in active video monitoring will be appropriately trained and continuously supervised in the responsible use of this technology. Violations of procedures for video monitoring referenced in this policy will result in appropriate administrative and/or disciplinary action consistent with the rules and regulations governing employees of the College.

Finally, any 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. Scope of the Policy

The following uses of video technology are not governed by the provisions of this policy:

- a. Academic Use. This policy does not apply to legitimate academic use of video cameras for educational purposes, such as those approved by the College's Institutional Review Board for the protection of human research participants.
- b. Private Video Cameras. This policy does not apply to private video cameras owned and operated by members of the campus community.
- c. Law Enforcement Surveillance. This policy does not apply to cameras used covertly by any law enforcement agency for criminal surveillance. This includes any portable hidden cameras with recording equipment

used by the CCGPD for criminal investigations with the approval of the Chief, CCGPD.

- d. Unrelated to Surveillance. This policy does not apply to video cameras or webcams established for reasons unrelated to surveillance activity, including remote monitoring of facilities construction to ascertain project progress, campus public relations initiatives or videotaping of athletic events for post-game reviews.

II. **CCTV Installation and Placement**

The Chief, CCGPD shall propose recommendations to the President for the appropriate placement of video surveillance technology, taking care to ensure that the perimeter of view of fixed location cameras conforms to this policy.

In carrying out this responsibility, the Chief, CCGPD will also accept input and recommendations from members of the College community on suggested camera locations.

In proposing camera locations, the Chief, CCGPD shall be guided by the following rules governing placement of CCTV technology. Any exceptions to these rules must be approved by the President.

- a. Public Areas. Except when employed as a forensic tool by the CCGPD, video surveillance shall be restricted to public areas and areas commonly used by College community groups. These include, but are not limited to, the following areas:
 - Alleys, service drives, and streets
 - Athletic fields
 - Audience seating
 - Cash handling facilities
 - Dining facilities
 - Hallways
 - Laboratories
 - Library interiors

- Loading docks
 - Malls, sidewalks, and other pedestrian walkways
 - Parking lots
 - Retail establishments
 - Rooftops
 - Safes
- b. Private Areas. Video monitoring is limited to those areas where individuals would not have a reasonable expectation of privacy. Accordingly, except when specifically authorized, such as through the use of a search warrant, video surveillance shall not be approved in any of the following places:
- Individual dormitory rooms (without the occupant's permission)
 - Public restrooms toilet stalls
 - Public restrooms with urinals
 - Individual offices (with the occupant's permission and subject to narrow exceptions to safeguard money, documents and supplies)
 - Locker or dressing rooms (where showering or disrobing is routine)
- c. Residential Housing Views. The Chief, CCGPD shall ensure that camera positions and views of residential housing are limited. Any view of student housing will be no better than what is available with unaided vision. Furthermore, the view of a residential housing facility must not violate the any students' reasonable expectation of privacy in that area.
- d. Residential Housing Hallways and Lounges. In recognizing that students may also have an enhanced expectation of privacy in the hallways and lounges of residence facilities, video surveillance for safety and security purposes will not be used in residential hallways and lounges, unless the President, with the advice of the Chief, CCGPD, determines that a specific safety/security risk exists.

- e. Notice of Surveillance. Except in applications of forensic video surveillance being clandestinely conducted by law enforcement personnel, signs shall be displayed prominently in public areas covered by video surveillance informing the public of the usage of video surveillance on the campus.
- *Exterior Cameras.* For exterior cameras, these signs will be posted in a conspicuous place in close proximity to the video surveillance camera.
 - *Interior Cameras.* For interior cameras, video surveillance warning signs shall be placed at or near each entrance to the places being monitored.

In addition to noting that a specified area is subject to video surveillance, the signage shall also include the name and phone number of a contact person who can answer questions about the surveillance system and this policy.

- f. Notice of Policy. The Chief, CCGPD is responsible for disseminating this policy on campus and for advising departments on the appropriate application of surveillance technologies. Additionally, to help maintain an informed College community, the CCGPD will post this policy on its website, as well as location information for all CCTV monitoring locations.
- g. Placebo Cameras. The College will not utilize inoperative, perfunctory, placebo, or “for looks-only” video surveillance equipment. The existence of placebo cameras is difficult to keep secret, and public knowledge of placebo camera installations lessens the deterrent effect of all video surveillance systems.
- h. Changes in Law or Security Practices. The Chief, CCGPD shall monitor developments in the law and in security industry practices to ensure that camera surveillance is consistent with the best practices and complies with all Federal and State laws.
- i. Installation. The CCGPD shall oversee the installation of all approved surveillance equipment, along with appropriate personnel from the Information Technology Services.
- j. Objections to Camera Placement. Where complaints are made about the location of video surveillance cameras at the College, such as by students

who believe their privacy is being infringed upon, the following process shall be followed:

- The Chief, CCGPD will review complaints regarding camera locations and determine whether this video surveillance policy is being followed.
- The Chief, CCGPD will make a determination as to whether the potential benefit in community security outweighs any likely infringement of individual privacy.
- In light of this determination, the Chief, CCGPD will make a recommendation to the President regarding disposition of the complaint.
- Once a final decision regarding the complaint is reached, the complainant will be notified, in writing, of that decision.
- While not always possible, every attempt should be made to finalize decisions regarding complaints about video surveillance locations within ten (10) working days of receipt of the complaint.

III. **Monitoring**

All College employees involved in video monitoring of public areas will perform their duties in accordance with the practices outlined in this policy. Specifically, the following guidelines shall apply to the monitoring of video surveillance cameras at the College:

- a. Generally. CCTV monitoring of campus areas for security purposes will be conducted in a manner that is professional, ethical, legal, and consistent with all existing College policies, including, but not limited to, those governing sexual harassment and equal employment opportunity. Camera monitors shall monitor based on suspicious behavior, not individual characteristics. Monitoring individuals based on a person's race, gender, sexual orientation, national origin, disability or other protected characteristic is strictly prohibited.
- b. Restricted Access. Video surveillance monitors shall be located in controlled-access areas and shall not be viewable by unauthorized persons. No unapproved employees may monitor or view video or camera images for any reason except as necessary in the course of an investigation or adjudication. In furtherance of this expectation, the College will take reasonable security precautions to prevent unauthorized

access to, use or disclosure of data monitored or recorded by any College surveillance systems.

c. Viewing Access. Access to video surveillance monitors will be limited. Specifically, the following guidelines shall apply in granting access to monitor the video surveillance cameras:

- *CCGPD personnel* will be permitted access to monitor all cameras at all times, regardless of location.
- *Information Technology Services* personnel will be permitted access to monitor all cameras at all times, regardless of location.
- *The President, Vice President of Business Affairs, and Vice President of Academic Affairs* will be permitted access to monitor all cameras at all times, regardless of location.
- *Other Cabinet members* not listed above will be permitted access to monitor all cameras that capture images or areas that fall within the work area or building location of any Department under their purview.
- *Department heads* will be permitted access to monitor all cameras that capture images or areas that fall within their work area or building location.
- *Other faculty and staff personnel* shall be permitted access to monitor all cameras that capture images or areas that fall within their work area or building location **only** with the written concurrence of their Department head and the approval of the Chief, CCGPD.
- No other access shall be granted to any other members of the College community except as may be otherwise provided in this policy.

Requests for exceptions to the guidelines listed above shall be made, in writing, to the Chief, CCGPD. The request shall identify the individual for whom access is sought, the area to be monitored, and the rationale for why access should be granted. The decision to grant access will be made by the Chief, CCGPD.

- d. Training. All personnel involved in the supervision, application, use or monitoring of video surveillance technology at the College will meet the following requirements:
- *Be trained* in the technical, legal and ethical parameters of appropriate camera use; and
 - *Receive a copy* of this policy and provide written acknowledgement that they have read and understood its contents.
- e. Private Rooms or Areas. Camera control operators shall not view private rooms or areas through windows.
- f. Intimate Activity. Camera control operators will not spot and continuously view people becoming intimate in public areas.
- g. Audio Recordings. The video surveillance systems used by the College will record video only. Audio recordings will not be authorized, unless specifically approved by the College's legal counsel.
- h. Evaluations of Employee Performance. Video surveillance cameras will not be used by the College to evaluate employee performance or to monitor employees during their non-working time. However, surveillance camera may be used to monitor a student or employee work area, such as an area with financial transactions, even if there is only one student, faculty or staff member employed in that work area. Video surveillance camera used to monitor a work area will not be used to view the contents of computer screens.
- i. Data Collection. Video surveillance cameras shall not be used to collect data on students, such as parking patterns or student activity.
- j. Community Requests. Members of the College community who have the possibility of being observed through the use of cameras may request to see live video of active monitoring; recorded video is not available for viewing. This request will be made to the Chief, CCGPD, and when convenient to do so, should be granted, consistent with operational requirements.

IV. **Storage**

Video tapes or other media will be stored and transported in a manner that preserves security. Further, recorded images not related to or used for an investigation shall be kept confidential and destroyed on a regular basis. Accordingly, the following guidelines regarding the storage of video surveillance records shall be strictly adhered to:

- a. Location. Video surveillance records shall be stored in a secure location with access limited to authorized personnel only.
- b. Timeframe. Generally, video surveillance records shall be stored for a period of not less than 30 days, after which they will be promptly erased, unless retained as a part of a criminal investigation, court proceedings (criminal and civil) or other bona fide use, as approved by the President. However, the Chief, CCGPD, in consultation with the President, may determine that video surveillance records of identified high priority areas be stored for a period of not less than 90 days before being erased.
- c. Alterations. No attempt shall be made to alter any part of any surveillance recording. Surveillance centers will be configured so as to prevent camera operators from tampering with or duplicating recorded information.
- d. Access Log. An access log shall be maintained by the Chief, CCGPD of all instances of access to, or use of, surveillance records. This log shall include the date, time, and identification of the person or persons to whom access was granted, as well as a summary of the reason for which access was necessary.
- e. Operator Review of Recorded Footage. Camera control operators who view recorded video footage must do so in the presence of a supervisor to maintain the integrity of that video footage.

V. **Release of Information**

Information obtained through video monitoring will only be released when authorized by the President of the College, according to the procedures established in this policy. The following guidelines will govern dissemination of recordings obtained through the use of video surveillance technology:

- a. Law Enforcement Purposes. Information obtained through video monitoring will be used for security and law enforcement purposes, and the CCGPD will cooperate and assist local police as requested with

criminal investigations. This includes providing copies of any recordings within the College’s possession.

- b. Commercial Use. Under no circumstances shall the contents of any captured video recordings be exploited for purposes of profit or commercial publication, nor shall such recordings be publicly distributed except as may be required by law.
- c. Recordings Involving Criminality. Except as outlined in paragraph V.a (above), recordings directly related to a criminal investigation, arrest or subpoena will not be released to any party. Where requests for recordings take the form of subpoenas or other legal documents, appropriate liaison with the College’s legal counsel is required.

VI. Audit

The Vice President of Business Affairs shall conduct an annual audit of the CCGPD to ensure compliance with this policy. This audit and the results of it shall be provided to the President, along with any identified findings of non-compliance.

VII. Destruction or Tampering with Video Surveillance Technology

Any person who tampers with or destroys a video surveillance camera or any part of the video surveillance system will be subject to appropriate administrative and/or disciplinary action, as well as possible criminal charges.

Responsibilities

| (Party) | (Responsibility) |
|---------------------------------|--|
| Chief, CCGPD | To oversee and coordinate the use of video surveillance equipment at the College. Also, to ensure CCGPD staff comply fully with the mandates of this policy. |
| Information Technology Services | To provide the Chief, CCGPD assistance with equipment, software, programming, and maintenance matters. |

Forms

Video Surveillance Policy Acknowledgement Form

Appendices

None