

# POLICY GOVERNING THE INSTALLATION AND USE OF CLOSED CIRCUIT TELEVISION CAMERAS (CCTVs)

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## I. PURPOSE

The purpose of this policy is to standardize the installation and regulate the use of closed circuit television (CCTV) cameras on the Goucher campus.

## II. DEFINITIONS

CCTV – CCTV (closed circuit television) is a generic term used to describe a variety of video surveillance technologies. More specifically, CCTV refers to a system in which one or more video cameras are connected in a closed circuit or loop, with the images produced being sent to a central television monitor or recorded. As used in this policy the term CCTV applies only to video recordings. The electronic interception and/or recording of audio are generally much more legally restrictive and are outside the scope of this policy.

Covert CCTV equipment – A camera is covert when it is hidden from normal view or otherwise secreted away.

Overt CCTV Equipment – A camera is overt when it is not hidden from general view, regardless of whether or not the individual being monitored sees the monitoring device or knows of its existence. Examples of overt surveillance devices include:

- CCTV mounted in parking lots, building entrances, stairwells.
- CCTV equipment mounted in a patrol car.

College property – includes all land, structures, or other real property owned, operated, leased or controlled by Goucher College. This includes, but is not limited to all common spaces, grounds and parking areas.

Private areas are defined as a portion of college property in which a person would have a reasonable expectation of privacy, including restrooms, residence rooms, personal offices, locker rooms or any other area designated as a clothing changing area. Personal offices do not include reception, informational or waiting areas.

Public areas are defined as any area of college property in which individual community members does not have a reasonable expectation of privacy. They include, but are not limited to, for purposes of this policy, classrooms, elevators, stairwells, and meeting and conference spaces.

Monitor or monitoring primarily refers to the viewing of historical recordings. 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; however the college reserves the right to do so with respect to any particular camera or cameras. The viewing of live video may occur if needed for legitimate safety and security purposes, such as surveilling an area in which a pattern of crime has been observed or reasonable suspicion of criminal activity exists.

### **III. SCOPE**

This policy applies to all personnel of the college in the use of CCTV monitoring and recording. This policy does not apply to legitimate academic use of cameras or video recordings for educational or journalism purposes, the general use of webcams by the college, or to the use of video recording of public performances, events or interviews. Use of this technology related to academic research is covered by the college's IRB policy and is therefore also excluded from this policy.

### **IV. PROCEDURES**

Goucher College is committed to enhancing the safety of members of the college community. Toward that end, it is the policy of Goucher College to utilize CCTV in public areas to enhance personal safety, deter and investigate crime and protect college property. The use of CCTV will be conducted in a manner consistent with the college's community principles and in compliance with all college policies, including the Non-Discrimination Policy and the Policy on Sexual Misconduct, Relationship Violence and Stalking.

The Office of Public Safety will be responsible for the monitoring of all CCTV equipment. The Office of Information Technology is responsible for the installation and maintenance of all CCTV equipment. Such equipment may be installed and used for legitimate safety and security purposes, which include, but are not limited to, the following:

- Monitoring of building perimeters, entrances and exits, lobbies, corridors in academic and administrative buildings, receiving docks, special storage areas, classrooms/laboratories and cashier locations
- Monitoring of access control systems
- Monitoring and recording restricted access transactions at entrances to buildings and other areas
- Verification and monitoring of security alarms
- Monitoring of locations protected by intrusion alarms, exit door controls, and hold-up alarms
- Monitoring of ATM locations and vending machines
- Monitoring streets, sidewalks, parking lots, and intersections
- Reviewing recorded images as part of a criminal or misconduct investigation, at the discretion of the Director of Public Safety
- Conducting surveillance for areas prone to on-going criminal activity

The Office of Public Safety shall ensure that members of the college community are aware of the presence and purpose of CCTV systems through appropriate signage and information

on the Office's website. The Director of Public Safety shall notify and receive authorization of the President, the Vice President and Dean of Students, and the General Counsel prior to the installation of covert CCTV equipment. The use of covert or hidden CCTV equipment will be conducted by law enforcement officers or public safety staff in compliance with federal, state and local laws, and only in connection with suspected criminal activity or violations of college policy. In addition, no covert cameras will be used in a location in which an individual has a reasonable expectation of privacy unless such use is authorized by a court or unless the resident of the space provides written permission for installation of such cameras.

The monitoring of CCTV systems by Public Safety shall be conducted in a professional, ethical and legal manner, and in accordance with all college policies. Personnel involved in video monitoring shall be appropriately trained and supervised in the responsible uses of this technology. Staff members will NOT monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, gender identity or other classifications protected by the college's Non-Discrimination Policy. Staff members will NOT continuously view people engaging in intimate behavior in public or private areas. Staff members will NOT view private rooms or interior areas through windows without a valid search warrant. Information obtained through video monitoring is used exclusively for permitted purposes and is considered confidential. Violations of the established procedures for video monitoring referenced in this policy, and/or any unauthorized use of the CCTVs or recordings will result in disciplinary action.

The selection of locations for the installation of CCTV cameras will be determined by the Director of Public Safety, based upon a data-driven need at a specific location. Consideration will be given to crime trends and the potential for criminal activity, and installation feasibility and costs. All decisions will be made in consultation with the Director of Facilities Management Services, the Vice President for Information Technology, and the Risk Management Committee, if time permits, to ensure that planned technologies are appropriate and feasible as proposed. Information about camera placement will be disseminated to the community in advance of installation to obtain input about proposed locations. The Director, in consultation with the above individuals and committee, shall weigh the privacy concerns of member(s) of the community expressed through this process, against the safety, security and crime prevention value of particular camera(s). The Director's decision shall be final.

The Office of Public Safety has primary responsibility for disseminating this policy.

## **V. RETENTION AND RELEASE OF RECORDS**

Video recordings shall be retained by the Office of Public Safety for a period of thirty days, to the extent practicable, and may be retained for a longer period at the direction of the Director of Public Safety and the General Counsel if it is to be used for a criminal investigation or court proceedings, or other bona fide use.

Recordings with information about students are considered law enforcement records, pursuant to FERPA, unless the college uses the recordings for disciplinary purposes or otherwise makes the recording a part of the student's education record. This means that absent release of the recording for these purposes, students are not entitled to view such recordings pursuant to FERPA.

Requests to view or obtain a copy of recordings by persons not authorized to access the system will be reviewed by the General Counsel and Director of Public Safety. Recordings are considered confidential and will be made available for official college and law enforcement purposes only if necessary to enhance personal safety, deter and investigate crime, and protect college property. The files will be distributed or made available for viewing in a secure manner. A log shall be maintained by the Office of Public Safety indicating the date and a time range of the files, camera views, and identification of the person receiving the files.

## **VI. COMPLAINTS**

Any individual who has reason to suspect misuse of the camera system should report it immediately to the Director of Public Safety, the Vice President and Dean of Students, or the General Counsel for investigation and appropriate action.