

Policy Governing the Installation and Use of Closed-Circuit Television Cameras (CCTVs)

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 College campus and establish expectations concerning the use of CCTV cameras and recordings by the college.

II. DEFINITIONS

CCTV – CCTV (closed-circuit television) is a generic term used to describe various video surveillance technologies. More specifically, CCTV is a system in which one or more video cameras are connected in a closed circuit or loop. The images produced are sent to a central television monitor and/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. For information with respect to the college’s policies regarding non-CCTV recordings, see the Policy Governing the Recording of Classes, Lectures, Meetings, Presentations, Events, and Calls.

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

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, used, or controlled by Goucher College—including and not limited to, all common spaces, grounds, and parking areas.

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

Public areas are defined as any area of college property where individual community members do not have a reasonable expectation of privacy. For purposes of this policy, they include and are not limited to 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 are monitored in real-time 24 hours a day, seven days a week; however, the college reserves the right to do so concerning any particular camera or cameras. In addition, the viewing of live video may occur if needed, at the sole discretion and determination of the college, for legitimate safety and security purposes, such as surveilling an area in which a pattern of crime is observed or where there is a reasonable suspicion of criminal activity.

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 journalistic purposes, the general use of webcams by the college, or 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, Goucher College's policy is to utilize CCTV in public areas to enhance personal safety, deter and investigate crime, and protect college property. The use of CCTV is conducted consistent with the college's community principles and in compliance with all college policies, including the [Non-Discrimination Policy](#) and the [Sexual Misconduct Policy](#).

The Office of Campus Safety receives requests from Campus Offices to install cameras and determines whether or not to allow the installation. The Office of Information Technology is responsible for approving the selection of all CCTV equipment before purchase. The office that requests the camera, once approved, is responsible for purchasing, upgrading, or replacing CCTV equipment. The Office of IT, or its designee, is responsible for the installation and maintenance of all CCTV equipment. Equipment may be installed and used for approved safety and security purposes, which include, but are not limited to, the following:

1. Monitoring of building perimeters, entrances, and exits, lobbies, corridors in academic and administrative buildings, receiving docks, particular storage areas, classrooms/laboratories, and cashier locations
2. Monitoring of access control systems
3. Monitoring and recording restricted access transactions at entrances to buildings and other areas
4. Verification and monitoring of security alarms
5. Monitoring of locations protected by intrusion alarms, exit door controls, and hold-up alarms
6. Monitoring of ATM locations and vending machines
7. Monitoring campus entry points, streets, sidewalks, parking lots, and intersections
8. Reviewing images as part of a criminal or misconduct investigation, at the discretion of the Director of Campus Safety

9. Conducting surveillance for areas prone to, or reasonably suspected of, criminal, prohibited, or otherwise harmful or potentially harmful activity

The Director of Campus Safety shall notify and receive written authorization from the Vice President for Campus Operations, following consultation with The Director of Risk Management, unless not reasonably possible under the circumstances, before covert CCTV equipment is installed by IT. The use of covert or hidden CCTV equipment is conducted by law enforcement officers or campus safety staff in compliance with federal, state, and local laws, and only in connection with suspected criminal activity, violations of college policy or violations of other laws. In addition, no covert cameras are used in a location where an individual has a reasonable expectation of privacy unless a court authorizes such use or unless (clear and obviously placed) signage is posted disclosing the existence of cameras. The Director of Campus Safety will consult with the Associate Vice President for Human Resources regarding the use of covert cameras for employment-related matters, the Dean of Students for student conduct-related matters, and divisional vice presidents as appropriate and necessary based on circumstances.

The monitoring of CCTV systems by Campus Safety shall be conducted in a professional, ethical, and legal manner and pursuant to college policies. Personnel involved in video monitoring shall be appropriately trained and supervised in the responsible use of the 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. In addition, 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 is determined by the Director of Campus Safety, based upon a data-driven need at a specific location. Consideration is given to crime trends, safety and security, the potential for criminal activity, and installation feasibility and costs. In consultation with the Vice President for Campus Operations and the Associate Vice President for Information Technology, the Director of Campus Safety will make decisions to ensure that planned technologies are appropriate and feasible as proposed.

The Director of Campus Safety will not use a facial surveillance system, including software and/or applications that perform facial recognition, within the CCTV camera network. Notwithstanding the forgoing, the use of such technology by law enforcement agencies is permissible where such use is authorized by law. The installation and use of advanced technology measures such as for the reading or recording of college-issued ID cards and associated biometric data, car identification tags/stickers, and/or state issued vehicle license plates shall be permissible only after receiving written authorization from the Vice President for Campus Operations.

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

V. RETENTION AND RELEASE OF RECORDS

Video recordings shall be retained by the Office of Campus Safety for twenty (20) days, to the extent practicable. They may be retained for an extended period at the direction of the Director of Campus Safety and 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 Director of Campus Safety. Recordings are considered confidential and are made available for official college and official law enforcement purposes only if necessary to enhance personal safety, deter and investigate crime, and protect college property. The files will only be distributed or made available for viewing in a secure manner. A log shall be maintained by the Office of Campus Safety indicating the date and a time range of the files, camera views, and identification of the person receiving the files.

VI. RESPONSIBLE OFFICIAL

The official responsible for administering this policy is the Director of Campus Safety. Any individual who has reason to suspect misuse of the camera system should report it immediately to the Director of Campus Safety or the Vice President for Campus Operations for investigation and appropriate action.

VII. HISTORY

Updated: November 2020; July 2022; February 2023