

AP 134c. Security Camera Video Surveillance and Usage

Associated Board Policy: 134.00

Procedure Owner: Vice President of Finance and Administration

Related Procedures: 134a, 134b

I. Procedure Scope and Purpose

These procedures govern the installation, usage, and management of video surveillance equipment at Cowley College. They aim to ensure safety and security while respecting privacy rights and complying with relevant laws.

II. Definitions

College Grounds: College grounds are property owned, maintained and/or operated by the College. This includes interior or exterior of any and all buildings and/or structures, sporting facilities, parking lots, streets, sidewalks, and thoroughfares.

Public Areas: Areas accessible to the general public, students, and or employees of Cowley College.

Private Areas: Areas that are assigned to or controlled by an individual or a select group of individuals such as private offices, semi private offices, or work areas.

Security camera: A camera used for monitoring or recording public areas for the purposes of enhancing public safety, monitoring restricted areas or equipment, to discourage theft and other criminal activities, and for preventing, investigating, and resolving incidents.

Security camera monitoring: The real-time review or watching of security camera feeds.

Security camera recording: A digital or analog recording of the feed from a security camera.

Security Camera Storage: Any local, network, or virtual recording appliance that is used to store a security camera recording.

Surveillance: The act of watching or tracking live action through electronic devices.

Video Management systems (VMS): software-based platform used to manage and control video surveillance cameras, recording devices, and other security components.

III. Procedure

A. Security Camera Installation

- i. Cameras are limited to uses that do not violate the reasonable expectation of privacy as defined by law. Where appropriate, the cameras may be placed campus-wide, inside and outside buildings as deemed appropriate by the Director of Campus Security and Public Safety and as approved by Administration. All camera installations are subject to federal and state laws.
- ii. Security cameras will not be installed with the intent to conduct personnel investigations, such as those related but not limited to work place attendance, work quality, or academic conduct.
- iii. the college may utilize security camera recordings captured during routine surveillance or upon reasonable suspicion that employees or students are violating college policy or state or federal laws, or in a civil suit or other proceedings involving person(s) whose activities are shown on the recording and relate to the proceeding. Information obtained in violation of these procedures may not be used in a disciplinary proceeding against a college student or employee.
- iv. Camera positions and views of residential housing shall be limited. The view of a residential housing facility must not violate the standard of a reasonable expectation of privacy. There will be no cameras placed inside any dorm room. Entrances, hallways, staircases, study rooms, laundry rooms, kitchens, and elevators are considered shared spaces within dormitories and therefore subject to camera monitoring.
- v. Security cameras shall not be used in private areas including residence hall sleeping rooms, bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothes, private offices, and rooms for medical, physical, or mental therapy or treatment.
- vi. The installation of 'dummy' cameras that do not operate is prohibited.
- vii. No audio recording will be made from surveillance cameras or through the video management system. Kansas law bars any such recording from any private conversation without the consent of at least one party to the conversation.

B. Security Camera Function

- i. Functions of cameras fall into three main categories:
 1. Property Protection: video captured and stored on a centralized video management system (VMS) for report of items stolen or damaged.
 2. Personal Safety: video captured and stored for report of assault or any hindrance to physical safety has been, is, or will be affected.
 3. Extended Responsibility: video captured and stored as needed to detect and deter violations of college rules and/or any unlawful acts according city, state or federal law.
- ii. Security cameras shall not be actively monitored continuously but they are intended to and may be utilized to deter crime and assist in investigations of crimes and recovery.
- iii. Security camera use on campus is considered inappropriate when it entails infringement on a person's reasonable expectations of privacy, filming as a means of surreptitiously evaluating employee performance, or reviewing previously recorded video for the purpose of catching campus violations.
- iv. Any persons who tamper with or destroy video security equipment will be subjected to criminal proceedings and/or campus disciplinary action.

- v. Students, employees, or visitors in violation of college procedures or codes of conduct, or any city, state, or federal law captured on video shall be subject to appropriate disciplinary actions, including suspension, expulsion, or termination. Violators may be referred to law enforcement agencies.

C. Access and Monitoring of Security Cameras

- i. All security camera recordings will be secured and managed by the Public Safety Department with technical support provided by the Information Technology (IT) Department. Any requests to view camera footage shall be made or submitted to the Public Safety Office.
 - 1. Requests to view camera footage will be made via email to the Security Department along with the appropriate reporting Vice President of the requesting department.
 - 2. The Vice President along with the Director of the Public Safety Department, or designee, will either approve or deny the request with a response to the email request.
- ii. All college security camera recording or monitoring of activities will be conducted in a manner that is consistent with college policies and state and federal laws; professional, ethical, and legal; not based on the subject's personal characteristics including age, color, disability, gender, national origin, race, religion, sexual orientation, or other protected characteristics.
- iii. College security cameras may be monitored for legitimate safety and security purposes that include, but are not limited to high-risk areas, restricted areas or locations, in response to an alarm, special events, and specific investigations authorized by the Director or Coordinator of Public Safety.
- iv. Any access or monitoring of security cameras is justified for the following purposes:
 - 1. Protect personal safety – is a person is assaulted or in any way their physical safety has been, is, or will be affected
 - 2. Maintain secure facilities – The College features a variety of buildings, each with their own security needs. Public Safety personnel shall utilize cameras in addition to primarily patrolling the campus, inside and outside facilities, to observe for suspicious behavior and unauthorized access.
 - 3. Protect property including buildings, grounds, equipment, and other assets of the College, as well as non-college property located temporarily or permanently on college grounds.
 - 4. Deter crime – Surveillance cameras can serve as a visual deterrent to crime such as theft and break-ins. The presence of a uniformed officer is a better deterrent however.
 - 5. Prevent vandalism – With security cameras, the threat of vandalism to school and/or personal property can be lessened but not eliminated.
 - 6. Monitor parking lots – Security cameras can help prevent and deter criminal activity and theft in parking lots or upon college property.
 - 7. Aid in investigations – Stored camera recordings may be used to identify individuals who have committed crimes or breached school policies or violated city, state or federal laws.
 - 8. Support other college policies – Security cameras monitor campus

- activity, working to ensure that college policies are properly followed.
9. Have remote access –Recordings from cameras throughout the campus may be viewed remotely by Public Safety Officers from computers, tablets, smartphones, etc. with an internet connection and access to the network while during their shift.
 10. Provide for a process to verify all cameras and the storage devices are functioning appropriately. Public Safety personnel shall check the functionality of each camera and each server during the course of the daily work assignment to ensure that all are functioning correctly. The IT department shall provide support Public Safety personnel to ensure that the network and related hardware or software is up-to-date and working as needed for effective operation.
 11. Assist in enforcing the College’s policy of zero tolerance for violence.
 12. Cameras should enhance, not substitute as a replacement for, patrols by Public Safety personnel.
- v. For property protection, personal safety, and extended responsibility, security cameras and access to live or recorded video is limited to authorized personnel of the Public Safety Department or other person(s) authorized by an executive level administrator.
 - vi. Exporting, copying, storing, duplicating, or retransmission of live or recorded video from the VMS or security cameras is limited to personnel within the Public Safety Department. Recorded or printed images may only be used to document violations or incidents which may be appealed or where a similar action may be taken, to assist in identification of affected individuals or property, or upon request by law enforcement to assist in an investigation. Any other collection method of capturing or storing images or video from security cameras is strictly prohibited.
 - vii. All VMS server logs are stored in a secure, centralized college VMS for a minimum of one year and then promptly erased or written over, unless exported and retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Director of Public Safety.
 - viii. All surveillance video and records are stored in a secure, centralized college VMS for a minimum of 21 days and then promptly erased or written over, unless exported and retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Director of Public Safety.

D. Appropriate Use and Confidentiality

- i. VMS system users are prohibited from using or disseminating information acquired from college security cameras, except for official purposes. All information or observations made in the use of security cameras is considered confidential and can only be used for official college and law enforcement purposes.
- ii. Information must be handled with an appropriate level of security to protect unauthorized access, alteration, or disclosure. All appropriate measures must be taken to protect an individual’s right to privacy and hold college information securely through its creation, storage, transmission, use, and deletion.

- iii. Video surveillance records will generally not be released to the public, students, general employee, or parent(s) as the content of the video is a part of a student's college record and therefore subject to administrative and FERPA regulations. External requests of surveillance records will be reviewed by the Director of Public Safety and the President. Consultation may be sought from the college's legal counsel prior to the release of surveillance records.
- iv. The sharing or dissemination of any pictures or video captured or retrieved from the camera or VMS may only be shared internally with employees that supervise the affected person(s) or area(s), or have an administrative duty, or upon the request of law enforcement or subpoena. In times when an identity is unknown or when there is a greater threat to the campus community, images or video may be shared internally with employees only regarding the identification of an unknown person(s) or to increase the awareness and recognition of a person of concern where there is a great potential of further liability or danger to the campus community.
- v. The exact location, number and function of all cameras will generally be considered confidential for security purposes and not be released to the general public, guest or employee.
- vi. The college reserves the right to allow individuals to view video recordings only when it is necessary as part of an investigation of a crime, code of conduct violation, significant safety concern, or campus policy violation.

E. Applicability

- i. Unless explicitly exempted, these procedures apply to all personnel, departments, colleges, campus organizations, subsidiaries, residents, and public/private partnerships with the college for the installation and use of security cameras and their video monitoring and recording system on campus and in any college-owned or leased spaces.
- ii. These procedures do not apply to:
 - 1. Security cameras used inside the Public Safety Department office or vehicles
 - 2. Body worn cameras utilized by Public Safety Officers
 - 3. Mobile or hidden video equipment used in criminal investigations conducted by Public Safety
 - 4. Covert video equipment used for non-criminal investigations of specific instances which may be a significant risk to public safety, security, and property
 - 5. Automated teller machines (ATMs), which may utilize cameras
 - 6. Cameras used for academic purposes
 - a. Cameras used for research are governed by policies involving human subjects
 - 7. Webcams for general use by college personnel used for legitimate business purposes
 - 8. Use of video equipment to record public performances or events, sporting events, interviews, or other use for broadcast or educational purposes

F. Responsibility

Public Safety Department

- i. The Public Safety Department has the authority to select, coordinate, operate, manage, and monitor all campus security surveillance cameras and systems pursuant to these procedures in collaboration with and technical support either being provided by the Information Technology Department or outsourced to a third-party provider.
- ii. Oversee the installation, support, maintenance, replacement, and decommissioning of all approved security cameras or systems.
- iii. Provide advice to departments on appropriate applications of surveillance technologies.
- iv. Provide technical assistance to departments preparing proposals for the purchase and installation of security cameras.
- v. Review proposals and recommendations for camera installations and specific camera locations to determine that the perimeter of view of fixed location cameras conforms to these procedures.
- vi. Assess new camera locations and conduct an evaluation of existing camera locations and incidents as necessary.
- vii. Test cameras and coordinate maintenance.
- viii. Review complaints regarding utilization of surveillance camera systems.
- ix. Seek consultation and advice from college legal counsel and other departments, as appropriate, prior to the release of video records outside law enforcement request.
- x. Monitor developments in the law, security industry practices, and technology so that camera surveillance is consistent with best practices and complies with federal and state laws.

Other Departments

- i. Individual departments, programs, or campus organizations which desire the installation of additional video surveillance equipment shall submit a written request to their appropriate supervisor or vice president describing the proposed location of surveillance devices, acquisition costs, funding resources available, on-going maintenance costs, and justification for the proposed installation. The written request shall then be submitted to the Vice President of Finance and Administration to review the request and recommendation to the President, if appropriate.

G. Other

These procedures shall be reviewed annually by the Site Safety Committee. The college shall notify staff, faculty, and students through policies and/or handbooks or by other notices or means that video surveillance occurs on college property.

IV. Effective Dates

This procedure first became effective: July 29, 2014

Revised: May 21, 2024

V. Signature and Title

A handwritten signature in cursive script that reads "Hally Harper".

This procedure is implemented by:

Title: Vice President of Finance and Administration