

Video Surveillance Policy

Adopted by President's Cabinet 2-28-17

I. Purposes of Policy

East Georgia State College (the College) is committed to maintaining the safety and security of faculty, staff, and students of the College and visitors to the College. The College is also committed to maintaining an environment conducive to quality education, individual privacy, diversity, and freedom of expression. This policy provides guidelines for the use of video surveillance technology in a manner that assures that those purposes are achieved. This policy also formalizes procedures for the installation, monitoring, storage, dissemination and destruction of video surveillance records.

II. Application of the Policy.

The policy applies to all faculty, staff, students, **and partners** of East Georgia State College and visitors to the College.

III. Definitions

These definitions apply to this policy:

- A. Public Area: Areas where a reasonable expectation of privacy is not violated by recording acts that may normally be openly observed. This area includes, but is not limited to, campus grounds, academic hallways, classrooms, libraries, study rooms, work areas other than private offices, common gathering areas in residential housing buildings and the student clubhouse, porches, decks, fitness room, fitness center, game room, athletic training room, alleys, vending areas, service drives, and streets, athletic fields, audience seating, cash handling areas, dining facilities, hallways, laboratories, loading docks, sidewalks, other pedestrian walkways, parking lots, retail establishments, rooftops, and safes.
- B. Private Area: Areas in which there is a reasonable expectation that a user's behavior may not be openly observed. This includes, but is not limited to, areas where an individual might change clothing, residential housing rooms, bathrooms, shower areas, locker and changing rooms, individual dormitory rooms, kitchen work areas and private office spaces. An area which is public shall not be deemed to be a private area solely because there is only one person in that area at a particular point in time.
- C. Video Surveillance Technology (VST): Any 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. Closed Circuit Television Technology is one form of video surveillance technology.
- D. Authorized Personnel The President, the **Director of Public Safety / Chief of Police**, the Vice President for Information Technology **and** / or his or her designees, or any other individual specifically authorized in writing by the President or the **Director of Public Safety / Chief of Police**.

IV. Guidelines

The primary purposes of VST at the College are to promote a safe environment by deterring illegal and acts in violation of College or University System of Georgia policy; and to assist in the identification of individuals who commit acts in violation of law or policy. These guidelines shall be interpreted in a manner consistent with those purposes.

V. Trained Personnel:

All College personnel involved in the supervision, application, use or monitoring of VST will receive training appropriate for their role in the technical, legal and ethical parameters of appropriate camera use, access restrictions, and storage and retrieval guidelines, receive a copy of this policy and provide written acknowledgement that each has read and understood its contents.

VI. VST Installation and Placement

The **Director of Public Safety / Chief of Police**, in consultation with the Vice President for Information Technology, shall make recommendations to the President for the appropriate placement of VST, taking care to ensure that the perimeter of view of fixed location cameras conforms to this policy. The **Director of Public Safety / Chief of Police** will also accept input and recommendations from members of the College community on suggested camera locations. In proposing camera locations, the **Director of Public Safety / Chief of Police** and the Vice President for Information Technology shall be guided by the following:

- A. Public Areas. VST may be carried out in public areas.
- B. Private Areas. VST shall not be conducted in private areas. Any exceptions to this rule must be approved by the President. Exceptions may include, but are not limited to, use of VST in areas where monetary transactions occur or where the use of CCTV is needed to safeguard money or supplies from theft, destruction or tampering; or where needed to preserve food safety.
- C. Notice of Surveillance. Signs shall be displayed prominently in public areas covered by VST informing the users of those areas of the usage of VST in those areas. The signage shall include the phone number of the **EGSC Police Department**, to answer questions about the VST and this policy. For exterior cameras, signs will be posted prominently and in close proximity to the VST. For interior cameras, signs will be placed at or near each entrance to the places being monitored.
- D. Placement is Not Guarantee of Continual Surveillance. 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.

VII. **Director of Public Safety / Chief of Police** Monitors Installation, Compliance and Complaints

- A. Changes in Law or Security Practices. The **Director of Public Safety / Chief of Police** shall monitor developments in the law and in security industry practices in order that VST placement and use is consistent with accepted practices and complies with applicable law.
- B. Installation. The **Director of Public Safety / Chief of Police** shall oversee the installation of all VST, in consultation with the Vice-President for Information Technology. Requests to change the view of individual cameras shall be made, in writing, to the **Director of Public Safety / Chief of Police**. In consultation with the Vice President of Information Technology and / or his or her designees, the **Director of Public Safety / Chief of Police** will make a determination on the camera view and advise the requestor.
- C. Objections to Camera Placement. If any written complaint is made about the location or manner of use of VST at the College, the following process shall be followed: The **Director of Public Safety / Chief of Police** will review complaints. The **Director of Public Safety / Chief of Police** will make a determination as to whether the potential benefit to safety and security outweighs any likely infringement of individual privacy. In light of this determination, the **Director of Public Safety / Chief of Police** 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.

- D. Dissemination of the Policy. The **Director of Public Safety / Chief of Police** shall make copies of this policy reasonably available to College personnel, maintain a copy of this policy on the **EGSC Police Department** website, maintain appropriate location information for all VST, and advise departments on the appropriate application of VST as needed.
- VIII. Monitoring. All College employees involved in video monitoring of public areas will perform their duties in accordance with this policy. The following guidelines shall apply to the monitoring of VST:
- A. Generally. VST 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 watch for 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 to Images Recorded. Only Authorized Personnel may view or download images recorded by VST. When VST records are reviewed, Authorized Personnel who view recorded video footage must do so in the presence of another authorized person to maintain the integrity of that video footage. **If a College employee has a valid business reason for viewing and or downloading images to disc, they will complete the "Request to Pull Video Footage" form on the MyEGSC portal and forward it to the Director of Public Safety / Chief of Police.**
- C. Request for Exception to Access Restrictions. Requests for exceptions to the above guidelines concerning access to images recorded shall be made, in writing, to the **Director of Public Safety / Chief of Police**. The request shall identify the individual for whom access is sought, the area to be monitored or the images to be reviewed, and the rationale for granting access. The decision to grant or deny access will be made by the Director of Public Safety / Chief of Police. The **EGSC Police Department** will maintain a file of such requests and a log indicating to whom access was granted.
- D. Evaluations of Employee Performance. Regular, continuous VST will not be used by the College as a sole method of evaluation of employee performance.
- E. Data Collection. VST shall not be used to collect data about behavior of groups of individuals using an area over a period of time, such as parking patterns or levels and types of use of study or recreational areas.
- F. Requests to Observe Real Time Monitoring. Any individual who may be observed through the use of VST may request to see live video of the area in which that individual may be observed. That individual may request to observe the active monitoring of the area in which that person could be observed for a limited time. Recorded video is not available for viewing. This request will be made to the **Director of Public Safety / Chief of Police**, and when convenient to do so, should be granted, consistent with operational requirements of the area being observed.

- G. Videotapes and Media. Video tapes or other media will be created, stored and transported, destroyed/erased in a manner that preserves the integrity of the recording, ensures safeguarding of the media for a limited time, and ensures periodic erasure/destruction. All media collected by VST will be stored for a limited period, subject to a regular erasure/destruction schedule as described below.
- H. Location. VST records shall be stored in a secure location, maintained by the **Official Records Retention Custodian of the College, with access limited to EGSC Police or IT personnel.**
- I. Log. The **EGSC Police Department** will keep a log of the recorded media, indicating creation date, _ dates contained within a rotation cycle and dates of destruction.
- J. Regular Erasure or Destruction of Records. **In compliance with USG policy, VST records for non-Incident or Accidents shall be stored for a period of 30 days, after which they will be promptly erased or otherwise destroyed. For known Incident / Accident related video, records shall be retained for a period of 4 years, 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 **Director of Public Safety / Chief of Police**, 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. **See the USG policy at http://www.usg.edu/records_management/schedules/933/P25.**
- K. Alterations. No attempt shall be made to alter any part of any VST recording. VST workstations will be configured so as to prevent camera operators from tampering with or duplicating recorded information.
- L. Access Log. An access log shall be maintained by the **EGSC Police Department** for all instances of access to, or use of, VST 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.

IX. Release of Information

Information obtained through VST will only be released when authorized by the President of the College or his designee, 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 VST may be released to federal, state or local law enforcement personnel for security and law enforcement purposes by the **EGSC Police Department**. The **EGSC Police Department** will cooperate and assist federal, state and local law enforcement personnel in the course of official investigations by those law enforcement personnel. This includes providing copies of any VST recordings within the College's possession.
- B. Commercial Use. Under no circumstances shall VST 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. Release Pursuant to Valid Judicial Orders. VST recordings will be released as required by subpoenas or other judicial process or orders after consultation by the **EGSC Police Department** with the College's legal counsel.

X. Destruction or Tampering with Video Surveillance Technology

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

XI. Violation of this Policy

Any use of VST for purposes other than those listed in this policy would undermine the acceptability of these resources for critical safety and security goals and is strictly prohibited. Violations of policy will result in appropriate administrative and/or disciplinary action consistent with the rules and regulations governing employees of the College. 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.

XII. Exclusions

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, provided the video cameras are not used to monitor any computer screens.

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 the use of video surveillance technology as authorized by a search warrant or to use by certified law enforcement officers, including any certified law enforcement officers employed by the College in the course of the investigation of specific cases within the scope of their duties as certified law enforcement officers.

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.