

SECTION: 4.0 Administrative

SUBJECT: Surveillance Camera

Background: This policy sets out the framework within which Lewis-Clark State College will use surveillance cameras.

Point of Contact: Security Office

Other LCSC offices directly involved with implementation of this policy, or significantly affected by the policy: Vice President for Student Affairs and Human Resource Services

Date of approval by LCSC authority: June 14, 2016

Date of State Board Approval: N/A

Date of Most Recent Review: 6/2016

Summary of Major Changes incorporated in this revision to the policy: Minor editorial updates.

1. Policy Statement

Lewis-Clark State College will use surveillance cameras to enhance the safety and security of students, employees and property, while protecting individuals' rights to privacy. The primary intent of surveillance camera use at Lewis-Clark State College is to deter unlawful behavior and enhance the likelihood of apprehending offenders. Fixed cameras overlooking public places for TV broadcasts, websites and other promotional uses are not subject to this policy.

2. Rationale

Lewis-Clark State College is committed to providing a safe and secure learning environment. The use of surveillance cameras is part of an integrated security approach which includes a number of strategies, including physical presence of security staff, access controls, and alarm systems. Surveillance cameras may be used in circumstances where potential users demonstrate that cameras will support crime prevention and the apprehension of offenders.

3. Guidelines for camera installation and register use

A. Surveillance Camera Register

- (1) A *surveillance camera register* will be kept for each camera installed. This register will be approved by the Director of Security and available to senior administrators (President and Vice Presidents, or their designees).

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(2) The register will contain the following information:

- a) Department and/or individuals supervising camera usage
- b) Location of camera
- c) Hours of operation
- d) Installation date
- e) Review dates and persons reviewing live feeds or recordings
- f) Date camera is removed from a specific location
- g) Location of storage of recordings from this camera

B. Use and Management of Recordings

- (1) Surveillance camera recordings and their contents must not be used or disclosed for purposes other than those specified in this surveillance camera policy.
- (2) All recordings and their contents are the copyrighted property of Lewis-Clark State College and shall not be copied, distributed or used for any broadcast, performance or publication without the express written direction of senior administration, except when such actions are taken by law enforcement in conjunction with investigations or criminal prosecutions.
- (3) The Director of Security will have access to all recordings and has the right to control, view, hold, store and dispose of recordings in accordance with this policy.
- (4) The Director of Security will be responsible for reviewing the recordings, according to the terms of this policy. Recordings are reviewed only when a crime or unusual event requires review by qualified security personnel.
- (5) Footage that appears to depict unlawful student behavior will be referred to Student Affairs for adjudication within ten working days. Unlawful acts captured and identified in recordings will be investigated and reported to law enforcement as necessary in line with Security procedures.
- (6) Recordings will be made available to appropriate representatives from Student Affairs and Human Resources Services upon request, for viewing at the Security Office during business hours. All viewing will be logged into surveillance camera registers, identifying the need to view the recording, individuals present and the date.
- (7) Unless the Director of Security instructs otherwise, recordings will be kept for thirty (30) days, after which they may be erased or destroyed unless they are required for ongoing investigations, or as a record to substantiate College decisions. Copies of recordings will not be made unless they are relevant to the purpose of the surveillance. Recordings will not be made available for civil proceedings involving third parties except where required by law.

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(8) Circumstances under which image recordings will be shown to a non-Lewis-Clark State College third party include:

- a) Unlawful acts (Police matters)
- b) To meet legal requirements (Occupational Health and Safety, court orders, etc.)
- c) Emergencies and natural or man-made disasters. The College has a memorandum of agreement with Lewiston Police Department to provide LPD emergency responders access to LCSC surveillance cameras in the event of response situations.

C. Positioning cameras

- (1) Cameras shall be located only in the physical area indicated by the registration process. (refer to 4.A.(1) of this policy).
- (2) Duration of any temporary surveillance camera monitoring is limited to a specific designated time period, a need for which is identified according to this policy and is recorded in the register.

D. Informing the public

- (1) In all College areas where surveillance camera monitoring occurs, signs must be displayed indicating that an area may be monitored, in compliance with signage requirements under relevant laws and regulations. **Signage is the principal means to inform all parties of surveillance camera installation.** The location of signs will be in accordance with law.
- (2) In addition to signage, employee and student handbooks will indicate that surveillance cameras may be used in accordance with this policy. Copies of this policy will be made available to employees and students upon request.
- (3) Signs indicating an area “is monitored by surveillance cameras” shall not be installed, or allowed to remain, in an area unless the area is actually being monitored. Signs stating an area “may be monitored by surveillance cameras” can remain.

E. Protecting privacy

- (1) Areas where students and staff could have a reasonable expectation of privacy will not be the subject of surveillance camera monitoring except under specific instruction from police or an authorized law enforcement agency. Such areas include, but are not limited to, restrooms, toilet and shower cubicles, locker rooms, changing rooms, etc.
- (2) Cameras may not be used to observe employees in their regular work areas without the specific approval of the Director of Human Resources Services and Senior Administration. It is recognized that some employees such as Physical Plant workers, Custodians and Security Officers have campus-wide access. Such employees may be viewed or recorded incidentally by surveillance cameras that are installed in common areas.

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- (3) Surveillance cameras must not be used a) to zoom in on or pry into a specific person's routine activities unless suspected of an illegal activity, or b) to otherwise abuse the privacy of students and staff.

4. Monitoring and Measurement

The Director of Security will monitor camera usage on a regular basis, including:

- A. Review of surveillance camera registers
- B. Assessment of appropriate use. Assessments may include:
 - (1) Number of unlawful acts in the area covered by camera(s).
 - (2) Number of complaints about inappropriate use.
 - (3) Degree of timely and complete information in the surveillance camera register.
 - (4) Degree to which the use and management of recorded material complies with established policies and guidelines.

5. Reporting

Reporting will be the responsibility of the Director of Security. The two key reporting lines are a) reporting of incidents to the Student Affairs and/or Local Police Department, and b) use and management of surveillance camera facilities to the Vice President for Finance and Administration.

6. Policy Review and Oversight

At the instigation of the Director of Security this policy will be reviewed by the surveillance project team after it is accepted, and every year thereafter. Recommendations arising will then be forwarded to Senior Administration.