



SECURITY CAMERA POLICY – APPROVED 10/2023

Terms:

1. The Department of Security and Campus Safety is referred to as “Security” in this document
2. The Department of Information Technology Services is referred to as “IT” in this document

Purpose:

At Simpson College we strive to achieve the safest possible campus for our community. We believe the integration of technology into our safety and security practices will aid in this endeavor. A critical component of a comprehensive security plan is utilizing a security and safety camera system. Surveillance of public areas will help the institution deter crime and assist in protecting the safety and property of the Simpson community. Simpson College uses security cameras and a centralized video management system to achieve this goal through consistent response and the ability to retrieve recordings of observed public areas using defined procedures.

Installation Procedures and Locations:

Security cameras will be placed in strategic and non-intrusive (areas where there exists no expectation of privacy) locations in order to adequately capture the intended area while not violating the standard of a reasonable expectation of privacy. Simpson College reserves the right to remove any unapproved or nonconforming devices.

Viewing/Monitoring/Accessing Recordings:

Simpson Security, in conjunction with IT, has the authority to select, coordinate, operate, manage, and monitor all campus surveillance systems pursuant to this policy. All departments using camera surveillance are required to coordinate surveillance operations through Security and IT and comply with this policy.

All recording or monitoring of activities of individuals or groups by college security cameras will be conducted in a manner consistent with college policies, state, and federal laws, and will not be based on the subjects' personal characteristics, including age, color, disability, gender, national origin, race, sexual orientation, or other protected characteristics. Furthermore, all recording or monitoring will be conducted in a professional, ethical, and legal manner.

Images captured by security cameras can be observed in real-time, but the cameras will generally not be actively monitored and will mainly be viewed from captured video upon a report needing further investigation.

All personnel with access to college security cameras should be trained in effective, legal, and ethical use of monitoring equipment. Those personnel shall receive a copy of this policy and provide written acknowledgement that they read and understood its contents.

Security and IT are responsible for advising departments on appropriate applications of surveillance technologies and for providing technical assistance to departments preparing proposals for the purchase and installation of security camera systems. These offices shall monitor developments in the law and in security industry practices and technology to ensure that camera surveillance is consistent with good practices and complies with all federal and state laws. Security and IT will review any complaints regarding the utilization of surveillance camera systems and determine whether this policy is being followed.

Retention and Release of Video Surveillance System Recordings/Information:

Surveillance footage will be secure and accessible only by authorized personnel as determined by the Director of Security or the Dean of Students. Any information gathered from the observation of these secure recordings is strictly confidential and is only to be used for official Simpson College business and/or law enforcement purposes.

Security cameras will not be installed or used with the intent to conduct personnel investigations, such as those related but not limited to workplace attendance, work quality, or academic conduct. However, Simpson may utilize security camera recordings captured during routine surveillance or upon reasonable cause for suspicion that employees or students are violating college policy or state or federal laws, or in a civil suit or other proceeding involving person(s) whose activities are shown on the recording and relate to the proceeding.

When an incident is reported, the personnel responsible for the area in question may request Security to review the images from the camera. All requests for the release of footage and/or information obtained by security cameras must be submitted to the Director of Security. As circumstances require, the President, or their designee, may authorize others to review images. Video management system users are prohibited from using or disseminating information acquired from college security cameras, except for official purposes. All information or observations made through security cameras is considered confidential and can only be used for official college and law enforcement purposes. A record log will be kept for a period of one year of all instances of access to, and use of, recorded material.

Applicability

Unless explicitly exempted, this policy applies to all personnel, departments, campus organizations, subsidiaries, tenants, and public/private partnerships with Simpson College for the installation and use of security cameras and their video monitoring and recording systems on campus and in any college-owned or leased spaces.

This policy does not apply to:

- Automated teller machines (ATMs), which may utilize cameras

- Cameras used for academic purposes
 - Cameras used for research are governed by policies involving human or animal subjects
 - May not be used as a security camera or in another manner with the intent of circumventing this policy
 - Network attached, academic related cameras must still be maintained and attached to the network with guidance from IT.
- Webcams for general use by college personnel (e.g., webcams installed on individual workstations, laptops, tablets, or cellular telephones) used for legitimate business purposes (e.g., video conferences)
 - May not be used as a security camera or in another manner with the intent of circumventing this policy
- Use of video equipment to record public performances or events, sporting events, interviews, or other use for broadcast or educational purposes (e.g., videotaping athletic events for post-game review, videotaping concerts, plays, and lectures, or videotaped interviews)
 - May not be used as a security camera or in another manner with the intent of circumventing this policy

SECURITY CAMERA REQUEST PROCEDURES – PROPOSED

Department Request for Security/Video Surveillance System

1. All requests for the placement of a camera subject to this policy must be made in writing to the appropriate Vice President.
 - a. All requests shall include:
 - i. A description of the proposed location of surveillance devices
 - ii. Justification for the proposed installation including information on specific security concerns at the requested location.
 - iii. Cost estimates and funding source or sources for purchase, licensing, and ongoing maintenance.
 - b. Requests for camera services will result in a security review conducted by Security to examine the security needs of that location and a recommended remediation strategy if necessary.
 - c. Campus Services shall request a security review during the planning stage of all new construction or major renovation projects for the purpose of including camera placement in these facilities, if necessary, such that placement can be integrated with the construction stage.
2. In reviewing requests, the appropriate Vice President shall consult additional pertinent offices as necessary including, but not limited to, Security, Residence Life, Campus Services, IT, and General Counsel.
3. The appropriate Vice President will bring recommendation to Cabinet and respond in writing to all requests for the placement of a camera within thirty (30) days of receipt of such request.
4. Appeals of a decision regarding the possible placement of a camera under this policy shall be made in writing to the President, or their designee.
 - a. All appeals need to include the original written request as well as the written response by the appropriate Vice President in addition to an additional justification for the placement request.
5. The appropriate Vice President will work with IT and Security to facilitate the installation.