

ADMINISTRATIVE PROCEDURE

Southwestern Oregon Community College

AP 3730 Surveillance and Monitoring Technology

Purpose:

To regulate the use of surveillance and monitoring technology to protect the legal and privacy interests of the college and the college community. The existence of this policy does not imply or guarantee that cameras will be actively monitored.

Information obtained through surveillance and monitoring technology is used exclusively for safety, security, employee and student conduct, and construction site monitoring purposes. Recorded images will be stored securely with access by a limited number of authorized staff.

Statement:

This policy applies to all college-owned, leased, or controlled property and facilities. Furthermore, this policy applies to all staff, students, volunteers, outside vendors, and contractors, as well as guests of the College.

The College uses surveillance and monitoring technology to monitor “public” areas to deter crime, improve safety, assist student services, and increase accountability of the College and its patrons. Any diversion of surveillance and monitoring technology for other purposes is prohibited.

The process of adding surveillance to an area will include a review by the Vice President of Administrative Services, the Director of Emergency Management, the Director of Facilities, and the Executive Director of Information Technology Services (ITS). Only authorized personnel, as determined by the Vice President of Administrative Services will be involved in, or have access to, surveillance monitoring or recording results. Network connectivity for surveillance and monitoring technology use must comply with ITS policies and procedures.

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

The college will comply with FERPA and will comply with state and federal laws around student records when the video includes personally identifiable information.

Scope of Surveillance and Monitoring Technology:

The use of surveillance and monitoring technology at SWOCC will be for the surveillance of areas regularly visible to the public and have a direct implication for public safety. This may include, but not be limited to:

- Building entrances and exits
- Lobbies and waiting areas
- Parking lots
- Hallways
- Points of sale/transaction

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- Bus and shuttle stops
- Areas with high-value assets (computer labs, specialized storage)
- Testing areas

Use of surveillance cameras at SWOCC is **prohibited** in the following areas:

- Any area designed to accommodate changing of clothes
- Restrooms
- Locker rooms
- Designated lactation areas
- Individual employee workspaces (except those working at points of sale or frequent contact, e.g. retail, financial aid, reception)
- Inside Residence Life Apartments
- Video equipment installed in spaces used primarily for instruction shall not be used for security monitoring purposes.

Monitoring of Surveillance and Monitoring Technology:

Monitoring of surveillance cameras at SWOCC will occur on an as-needed basis by the Campus Safety Department or designee. This means that the system may not be constantly monitored, but it will be consistently active and available for viewing by authorized personnel.

Continuous monitoring may include the following instances as necessary

1. During active incidents involving violence and suspicious circumstances
2. At unscheduled times to augment foot and vehicle patrol
3. During investigations
4. During special events
5. When an on-site response may compromise safety or effective investigations

Campus Safety Officers must document all reportable observations in detail on the Maxient Reporting system and daily officer logs.

College Staff will not engage in the following as part of monitoring:

1. Repositioning of cameras for observations of activity not related to public health and safety
2. Viewing of cameras remotely unless authorized by the Director of Emergency Management.
3. Viewing of areas excluded from monitoring in this policy through windows, reflections, or other secondary means

Recording, Storage, and Stored Data Access:

While Campus Safety will not constantly monitor the surveillance system, footage will be recorded and stored whenever Campus Safety is actively using a surveillance camera, or if triggered by some other means such as motion or analytic programming.

College staff are prohibited from using or disseminating information acquired from college security cameras, except for official purposes. All information and/or observations made in the use of surveillance and monitoring systems are considered confidential and can only be used for official college and law enforcement purposes upon the approval of the President or designee.

When accessing stored data, except during routine review, college staff will fill out a form that documents the following:

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- The surveillance and monitoring technology(s) used during the incident;
- Any pertinent information gathered by the system(s); and
- The name and signature of the Director of Emergency Management or Vice President of Administrative Services authorizing the investigation along with the date and time of access

Images obtained through surveillance monitoring or recording shall be retained by the Campus Safety department which operates the centralized, authorized surveillance system for a length of time deemed appropriate for monitoring, but not to exceed 90 days, unless such images have historical value, the College has been notified of potential litigation or are being used for a criminal investigation. Any questions about the storage of this data should be directed to the Director of Emergency Management. Requests for information release will be submitted to the Vice President of Administrative Services.

Information and results obtained through surveillance monitoring or recording will only be released when authorized by the college president or their designee.

All requests from sources external to the college for the release of information and results obtained through surveillance monitoring or recording shall be submitted to the vice president of administrative services for approval before release.

Information inappropriately obtained in violation of this policy shall not be used in any disciplinary proceeding against any college employee or student.

Instances Where Stored Video Footage May Be Released:

1. Stored Video Footage may be copied and transferred to any entity named in a Court Issued Subpoena.
2. Stored Video may be used by Campus Safety for investigation in an incident or as evidence in a reported offense. Authorization to retrieve, review, and release information about an investigation is restricted to the President or their designee.
3. Stored Video may be copied and transferred to any Law Enforcement agency that requests that footage to further support an investigation of a crime.

Unless there is an imminent health and safety issue and the video is part of a student disciplinary record it is covered under FERPA and may not be provided to law enforcement without a subpoena.

4. Stored Video may be copied and transferred to the Director of Conduct and Community Standards upon written request when it will be used in any student conduct proceeding with the approval of the President, or their designee.
5. Video footage that is intended to be used to investigate and/or support an allegation of employee misconduct may only be searched for and stored by the Office of Human Resources with the approval of the President or their designee.
6. Any additional requests will be approved by the President or their designee.

All use outside of the above instances where stored video footage could be released is prohibited. This could include the following examples, but are not limited to:

- No video surveillance footage may be saved or used for personal use
- No video surveillance footage may be saved and stored on personal removable devices

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- No video surveillance footage may be transmitted to any social media site or personal webpages
- No video surveillance footage may be used for financial benefit

Approved: June 12, 2024