



Policy: **Security Cameras**

Effective: 12/7/23

Campus Safety

Policy: Grace College will use security cameras to promote the safety and welfare of its students, employees, visitors, and property; deter crime; and assist in the investigation of crimes and recovery by observing and recording public areas of the campus.

Purpose: Grace College is committed to enhancing the quality of life of the campus community by integrating the best practices of safety and security with technology. To ensure the protection of individual privacy rights in accordance with Grace's values and state and federal laws, this policy is adopted to formalize procedures for the approval and installation of security equipment and the handling, viewing, retention, dissemination, and destruction of surveillance records.

Surveillance cameras are not a guarantee of safety, but are a tool that helps deter crime and assist in promoting the safety and security of individuals and property. 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, but the College reserves the right to do so.

Scope: This policy applies to all employees and property of the College in the use of security cameras, including temporary or portable security cameras, with the following *exceptions*:

1. Cameras or webcams approved for academic or educational purposes, videotaping events of public performances, marketing, or live streaming for general use by the College. Examples of such excluded activities include videotaping athletic events for post-game review; videotaping concerts, plays, and lectures; live stream activity; or interviews of people.
2. Cameras used for research, which are governed by Institutional Review Board (IRB) policies involving human subjects.
3. Student and employee personal or cell phone cameras.
4. Automated teller machines (ATMs), which may utilize cameras.

Definitions:

1. *Security or surveillance camera:* a camera used for recording public areas for the purposes of enhancing public safety; viewing restricted areas or equipment; discouraging theft and other criminal activities; and preventing, investigating, and resolving incidents.
2. *Security camera monitoring:* the real-time review or watching of security camera feeds.



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3. *Security camera recording*: a digital or analog recording of the feed from a security camera.
4. *Security camera systems*: any electronic service, software, or hardware directly supporting or deploying a security camera.
5. *Security camera footage*: recordings of activities and locations, including still images obtained from the recordings.

Procedures

All video footage obtained through the use of security cameras will be secured and managed by the Campus Safety Department and is regulated by the following procedures.

Administrative Oversight and Approval

1. Security camera use on campus is considered appropriate when it enhances the:
 - a. Protection of individuals, equipment and facilities.
 - b. Security of public areas.
 - c. Safety of building entrances and exits.
 - d. Investigation of criminal activity.
2. Security camera use on campus is considered *unacceptable* when it entails:
 - a. The installation of non-functional cameras that do not operate on a regular basis.
 - b. Infringement on a person's reasonable expectation of privacy.
 - c. Monitoring to surreptitiously evaluate employee performance or observe employees during non-work time.
 - d. Monitoring that violates practices of non-discrimination.
3. The Director of Campus Safety authorizes, oversees, administers, and coordinates the use of security camera equipment at the College and has the primary responsibility for disseminating and implementing the policy and procedures. In the administration of security cameras, the Director of Campus Safety or designee has primary responsibility for:
 - a. Annual audits of the use, footage clarity, and effectiveness of security cameras.
 - b. Reporting annual audit results to the Safety Committee.



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- c. Inspection of equipment and date/time stamps.
 - d. Labeling cameras and maintaining a record of installed security camera locations.
 - e. Coordinating the resolution of system malfunctions with the appropriate office.
4. Typically, the addition and prioritization of security cameras is a collaborative process between the Director of Campus Safety and the Director of the Physical Plant who present their recommendations to the Safety Committee.
 - a. The Safety Committee is familiar with new developments in the law and industry standards and protections.
 - b. The Safety Committee reviews proposals and recommendations for camera installations and reviews specific camera locations to determine that the perimeter view of camera locations conforms to this policy.
 - c. The Office of Information Technology will be consulted as needed when purchasing additional equipment.
5. A determination of the most appropriate use and implementation of security cameras, will be guided by, at a minimum, the following considerations:
 - a. Demonstrated need at the designated location(s)
 - b. Appropriateness and effectiveness of proposed protocol(s)
 - c. Use of additional, less intrusive means to further address the issue of campus safety (e.g., restricted access to buildings, use of key access cards or identification badges, increased lighting, alarms)
 - d. Right to reasonable expectation of privacy and other legal considerations
 - e. Expense involved to install and maintain security cameras at the designated location(s)
6. Department, faculty, or staff members requesting temporary or ongoing video surveillance on campus should submit this request to the Director of Campus Safety including a clearly stated reason for surveillance, financial support sources, protocols to protect privacy, and length of intended surveillance. The director will consult with the Safety Committee, vice president, or chief human resources officer if there are questions about the exact nature of the request.
 - a. Individual employees and departments are not to install or maintain their own security cameras; rather, they should make a request to the Director of Campus Safety for installation of a security camera to ensure compliance with this policy



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and compatibility with the system identified as the campus standard by Campus Safety, Safety Committee, OIT and/or institutional policy.

7. The Director of Campus Safety will ensure that appropriate campus signage on the exterior of buildings is posted for security camera use in that location.
8. Typically, no third-party surveillance cameras are permitted on Grace College property.
 - a. A committee of Grace staff members reviews and approves the use of cameras in campus locations associated with the county's deer reduction strategy. The committee is comprised of the COO, director of campus safety, dean of the chapel, and the director of the Lilly Center for Lakes and Streams.
 - b. These cameras are supplied and viewed by an approved third party and must be operated in compliance with Indiana privacy laws and other legal and ethical procedures outlined in this policy.
 - c. Any suspicious activity recorded on these cameras is reported to campus safety, local law enforcement, and/or the Department of Natural Resources.
 - d. Signage is *not* posted on these cameras to prevent theft and destruction.

Ethical and Legal Use

1. 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 of camera footage.
2. Security camera recording and surveillance monitors will be handled with an appropriate level of security to protect against unauthorized access, alteration, duplication or disclosure of recorded information.
3. All installation and use of security cameras to record public areas for security purposes are conducted in a manner consistent with existing College policies, including Non-Discrimination, Title IX, Sexual Misconduct, Family Educational Rights & Privacy Act (FERPA), Acceptable Use, and other relevant policies.
4. Employees authorized to view or monitor footage will do so based on suspicious behavior or other legitimate safety and security purpose, not individual characteristics including race, gender, ethnicity, sexual orientation, disability, or other protected characteristics.
5. Information obtained from the cameras is intended for campus policy enforcement or to assist local law enforcement in the investigation of crimes or as otherwise may be required by law.



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6. Security camera use, including use for criminal investigations, is limited to practices that do not violate federal or state statutory or constitutional protections against unreasonable search and seizure, reasonable expectations of privacy, and other applicable laws prohibiting surveillance and sound recording.

Compliance

1. All authorized employees involved in video surveillance will perform their duties in accordance with this policy.
2. Anyone who tampers with video equipment will be subject to disciplinary action through students affairs or human resources as well as possible criminal charges.
3. Abuse of standard operating policies or inappropriate camera control operations will result in disciplinary action up to and including termination.
4. The VP of Administration and Compliance will review any complaints regarding the utilization of security cameras and determine compliance with this policy.

Installation and Location

1. All video camera installations are visible.
2. The College will limit camera positions and views of certain areas. Any view within a residential area will be no greater than what is available with unaided vision. Security cameras will not view private bedrooms, bathrooms, locker room dressing/shower areas, offices, classrooms not used as a lab, areas through windows, or any other area where there may be a reasonable expectation of privacy.
3. All new installation of security cameras must connect to the College's main server system.
4. The exact location, number, and function of all cameras will generally be considered confidential for security purposes and not released to employees without a need to know, the general public, guests, or students.
5. The College reserves the right to place cameras in areas that are not open to the campus or general public (e.g., closed buildings, secured areas, press box).
6. Cameras may be used to view areas with increased financial vulnerability.

Operation of Security Cameras

1. Non-operational or "fake" cameras are not installed as they may lead to a false sense of security that someone is monitoring an operational camera.
2. No audio is recorded.



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3. Campus Safety does not use automatic identification, facial recognition, or automatic tracking technologies when viewing or monitoring camera footage.
4. The security camera system will date and timestamp preserved footage.
5. Campus safety staff may view or monitor camera footage either by cell phone or desktop monitors.

Viewing and Monitoring

1. Regular, non-student campus safety employees may view or monitor camera footage. Exceptions must be approved in advance by the Director of Campus Safety.
2. Other authorized campus personnel, as determined by the Director of Campus Safety and Vice President of Administration and Compliance; law enforcement; or other first responders may view or monitor camera footage.
 - a. The Director of the Physical Plant and the Managing Director of the Office of Information Technology, or their designee(s), will have the ability to review security camera footage to ensure proper functionality at the request of the Director of Campus Safety.
 - b. Approved campus safety staff may monitor security camera footage alone.
 - c. Monitoring by any other individual must be approved in advance by the Director of Campus Safety and must be done in the presence of a regular campus safety officer.
3. Access to camera footage is password protected.
4. Camera footage is typically viewed only upon suspicion or report of a crime or campus policy violation, but may be monitored periodically for legitimate safety and security purposes that include, but are not limited to:
 - a. Known high risk situations
 - b. Times and locations that have previously experienced violations
 - c. Specific investigations upon reasonable suspicion
5. All information gathered and/or observations made in the use of security cameras is considered confidential and can only be used for official College and law enforcement purposes upon the approval of the Director of Campus Safety in consultation with other senior leadership as needed.
6. If, during the course of reviewing video footage, any other violation of College policy or state/federal law is witnessed, the information obtained will be forwarded to the



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appropriate department/agency for further action. Any footage that is forwarded should be done so following the procedures in this policy and other relevant College policies (e.g., FERPA, Title IX, Sexual Misconduct) regarding the release of footage.

7. All employees are prohibited from using or disseminating any information acquired from College security cameras for purposes other than for official college business, such as to investigate crimes, accidents, or suspicious behavior. Any disclosure internally or externally must be authorized by the Director of Campus Safety and/or the vice president of administration and compliance.
8. Individuals, departments, or agencies both within and outside the College may request the Director of Campus Safety review camera footage on their behalf regarding a specific situation, but in most circumstances are not permitted to view the footage themselves.
 - a. Employees or external agencies requesting that Campus Safety review security camera footage must do so in writing to the Director of Campus Safety. The following must be included in the email request:
 - i. Name of the individual about whom access sought (if known) or, alternatively, the situation about which information is sought.
 - ii. Name, title, and contact information of the individual making the request
 - iii. The date and time for which access is sought
 - iv. The rationale for why access should be granted.
 - v. A case number for law enforcement requests or subpoenas.
 - b. Students requesting that Campus Safety review camera footage should do so using a Voluntary Statement and include similar, relevant information as above. Campus Safety reserves the right to deny student requests and will prioritize those that are criminal in nature, emergencies, or likely to result in property damage or personal injury to its campus community.
 - c. The Director of Campus Safety will review the request with the appropriate senior leadership as needed and notify the requestor of the decision.

Training

1. Employees approved to view or monitor camera images will be trained in the technical, legal, and ethical parameters of appropriate camera use to perform their duties consistent with College policy and local, state, and federal laws and regulations.



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2. Employees with access to camera footage will receive a copy of this policy and provide written acknowledgment that they have read and understood its contents.

Retention and Release of Recordings

1. Images and related data collected by security cameras are the sole property of Grace College.
2. Recorded events are stored for approximately 30 days on a server/hard drive after which the recordings will be erased unless such images have historical value or are retained as part of an incident report, criminal investigation, court proceeding (civil or criminal), or other bona fide use as approved.
3. Security camera recordings will only be stored by the Campus Safety Department in a secure location. Individual departments will not store video surveillance recordings. The Office of Information Technology will be consulted to determine solutions to preserve footage if needed.
4. Security camera records are not released to the public, students, employees, parents, or law enforcement agencies without authorization by the Director of Campus Safety or pursuant to a subpoena.
5. Security camera footage is not considered "Directory Information" and may be subject to confidentiality restrictions including those requirements under FERPA.
6. Disclosure of any records or footage containing FERPA-protected information, including to law enforcement, will be handled in accordance with the College's FERPA policy, including that students have the right to inspect their own educational record.
7. The College may seek legal consultation related to any request prior to the release of any records.
6. Copies of security footage will not be duplicated or removed from the Grace College premises without authorization by the Director of Campus Safety.
7. As a private institution of higher education, Grace College is not subject to Freedom of Information Act (FOIA) or Access to Public Records Act (APRA) requests for information.
8. The Campus Safety Department will retain the written requests to access or use security camera footage by anyone other than authorized campus safety staff. The request will include the date, name of the person(s) to whom access was granted, reason for the request, and how the footage may be used, and retained for a minimum of one year.
9. Security camera footage may become part of a student's educational record or an employee's personnel file.



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Related Policies:

1. [FERPA](#)
2. Non-Discrimination
3. Title IX
4. Sexual Misconduct
5. Acceptable Use
6. Search and Seizure

Revision History:

Date	Description of Revision
12/1/21	Initial policy and cabinet approval
12/7/23	Added section on student requests for footage review. Clarification to other requests for footage.