

SOUTHWESTERN COMMUNITY COLLEGE	INFORMATION TECHNOLOGY VIDEO SURVEILLANCE SYSTEM AND RECORDINGS	Procedure 8.06.01
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I. PROCEDURE

A. General

1. Information, surveillance footage, video recordings, audio recordings, and images (collectively "Surveillance Footage") may not be accessed, used, or disclosed except as outlined in this Procedure.
2. Cameras shall be used in a professional, ethical and legal manner. The use of Cameras shall avoid unnecessary intrusions upon academic freedom and an individual's reasonable expectation of privacy.
3. Cameras shall be used in a manner consistent with the College policies including, but not limited to, policies that address nondiscrimination, sexual harassment, privacy, and freedom of expression.
4. The College will provide notice of the use of Cameras and this Procedure at employee orientation and include it in the student handbook. The College will also provide notice to faculty, staff, employees, students and the general public through the general use of signage throughout the College campus and/or facilities.
5. The College, in conjunction with Information Technology ("IT"), Human Resources ("HR"), and the Business Office ("BO"), has the authority to select, coordinate, operate, manage, and administer all Cameras pursuant to this Procedure.
6. The HR Director, or designee, will review all external requests to release Surveillance Footage obtained through the use of Cameras.
7. Violations of this Policy including, but not limited to, failure to avoid prohibited activity or obtain required approvals, will be addressed in accordance with applicable College policies and procedures.

B. Location and Operation of Cameras

1. Cameras may be installed and operated in public and/or common areas.
2. In addition, Cameras may be installed in the College in restricted access areas where faculty, staff, employees, students or the general public do not have a reasonable expectation of privacy.
3. Cameras will be located so that personal privacy and dignity is protected to the maximum extent possible.
4. Cameras may operate seven (7) days a week, twenty-four (24) hours a day.
5. Cameras may have the ability for live observation, two-way communications, and to record video and audio.
6. Cameras will not be installed for the purpose of managing or monitoring employee or student performance.
7. Cameras shall not be used in areas where College faculty, staff, employees, students or the general public have a reasonable expectation of privacy in accordance with accepted social norms including, but not limited to:
 - a. Bathrooms;
 - b. Lactation rooms;
 - c. Locker rooms;
 - d. Showers; and

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e. Changing facilities

C. Observation and Recording

- a. Cameras will be used for live observation and video recording.
- b. Cameras may be used for audio recording after appropriate notice of audio recording is provided to individuals in the proximate area of the camera. . Notice may be made through signage or an announcement. This provision shall not prevent the law enforcement with lawful authority from using audio surveillance when conducting a legitimate criminal investigation.

D. Access and Monitoring

- a. All recording and monitoring of activities of individuals or groups by Cameras will be conducted in a manner consistent with this Procedure, College policies and procedures, state and federal laws, and will not be based on the subjects' personal characteristics, including age, color, disability, gender, national origin, race, religion, sexual orientation, or other protected characteristics.
- b. Only individuals so authorized by the College are permitted access, observation, or maintenance to Cameras and Surveillance Footage as reasonably necessary to perform the functions of their positions.
- c. Nothing in this policy constitutes a responsibility to provide live monitoring of all Cameras on a continuous basis.

E. Appropriate Use and Confidentiality

- a. All individuals are prohibited from using or disseminating Surveillance Footage acquired from Cameras, except for approved purposes.
- b. All information, observations, and Surveillance Footage created by the use of Cameras are considered confidential and can only be used for official College and law enforcement purposes upon the approval of the Chief Information Officer or designee.
- c. Personnel with access to Cameras and Footage are expected to know and follow this Procedure.

F. Retention, Storage, and Destruction

- a. Surveillance Footage will be stored for a minimum of thirty (30) days in a secure manner that is configured to prevent unauthorized access, use, modification, duplication, or destruction, and accessible in a manner in accordance with this Procedure.
- b. Surveillance Footage may be erased or destroyed after thirty (30) days unless otherwise required to be maintained in accordance with this Procedure.
- c. Surveillance Footage that may be necessary for the evaluation of violations of the College's Rules and Policies, College administrative proceedings, or may become evidence in civil or criminal proceedings shall be kept indefinitely via a manual download and secure storage method unless instructed otherwise by legal counsel.
- d. All recordings saved pursuant to subsection c. above, will be destroyed one (1) year after there is no further need for the recording.

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- e. The destruction of Surveillance Footage must be conducted by the destruction or erasure of electronic media, footage, or images so that the information cannot practically be read or reconstructed.

G. User Access Requests

- a. If a College employee, to include a School Resource Officer ("SRO"), is deemed reasonably necessary to perform the functions of their positions by their supervisor to have access to the Cameras, then the following steps are required:
 - i. The employee submits in writing to their supervisor a justification for access to the Camera System to include the camera(s)/work area(s) to include the specific need for any archived (recorded) footage;
 - ii. Upon approval by the supervisor, a written approval is forwarded to the respective division Vice President of the College;
 - iii. Upon approval by the respective Vice President or President, a written approval is sent back to the supervisor;
 - iv. The supervisor can initiate a Camera Access form using the College's OnBase system for the requesting employee to access specific camera(s) whether only live access or archived (recorded) footage is needed.
- b. The approved request in OnBase will proceed via workflow with approvals through the respective Vice President or President and ultimately to the Vice President for Information Technology.
 - i. After final review for possible access request errors, the Vice President for Information Technology will approve the request.
 - ii. The IT designee for the Camera System will receive the approval and give the approved employee access to the Camera System.
 - iii. Access to the Camera System includes user access, software installation on the approved employee's computer, and training on how to access the Camera System.
 - iv. Access may be revoked for an employee or SRO at any time as deemed by the employee's supervisor, Vice President or President, or the Director of Human Resources.

H. Surveillance Footage Access and Requests

- a. Surveillance Footage (recorded video archives) access should only be requested and approved in a narrow set of circumstances and must be for a legitimate investigative purpose and viewing shall be consistent with applicable laws state and federal laws including FERPA.
- b. The College does not guarantee that recorded material is archived as most Cameras are motion-activated and storage capacity is limited based on concurrent recordings. Cameras may or may not be continuously monitored for issues.
- c. The employee's supervisor should deem it reasonably necessary to perform the functions of the employee's position to have access to the Surveillance Footage.
- d. Surveillance Footage should only be exported from the Camera System at the request of Law Enforcement or authorized officers of the college. Current authorized officers are as follows:

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- i. Chief Information Officer
- ii. Emergency Services/Safety Coordinator

ADOPTED: September 2025

REVISED: