

College Procedure: 304.22 – Security Camera Usage
Policy Reference: 304 – Campus Safety and Security
Responsible Department: Facilities & Public Safety
Approval Authority: Cabinet
Procedure Owner: Vice President, Facilities & Public Safety
Effective Date: 4/1/2021

Version Number: 1
Legal Counsel Reviewed (yes/no): No
Legal Reference(s):
Scope: College-wide

Reason for Procedure

Kirkwood Community College uses closed-circuit video camera systems (security cameras) to increase campus safety and security. They are intended to deter crime, assist in the investigation of crimes, the recovery of property, and enforce College policy.

The College protects individual privacy rights by following state and federal laws for the installation of security cameras and the handling, viewing, retention, dissemination, and destruction of recordings. Kirkwood security cameras are not actively monitored. Authorized and unauthorized uses of Kirkwood security cameras are described in this procedure.

The Procedure

Information Technology Services (ITS) will coordinate with the Security Camera Team under the direction of the Associate Vice President, Public Safety (AVP, PS) to:

- ensure the quality and integrity of systems,
- identify appropriate camera placement,
- take measures to ensure privacy, and
- appropriately manage the monitoring and retention of recordings.

Information Technology Services

ITS will:

- assess hardware and software for quality and interoperability,
- advise on the feasibility of camera placement,
- set minimum installation requirements (e.g., cabling), and
- manage recording storage logistics.

Security Work Group

The KCC Security Work Group is convened by the AVP, PS, and will include the following:

- Public Safety representative
- Member(s) of ITS
- Director of Maintenance Operations or designee
- Representative(s) of the installation area or building

The security work group will meet on an as needed basis to consider and make recommendations about potential camera installations. Team recommendations will be based on input from all applicable stakeholders such as: Title IX, Student Services, Human Resources, and employees in affected areas. The team will coordinate with the appropriate office(s) to ensure that appropriate measures are taken to protect individual rights to privacy and the security of information created, stored, transmitted, used, or deleted.

Camera Placement

Cameras will be located to prioritize personal privacy. No audio will be recorded. Camera placement must not violate the standard of a reasonable expectation of privacy. All installed cameras should be visible. Facilities with cameras may be marked with signage. The exact location, number, and function of all cameras will be considered confidential and not be released to the general public, guests, or employees.

The AVP, PS has approval authority on camera placement based on ITS and security work group recommendations.

Access and Monitoring for Official Business

Cameras are not actively monitored. Video recordings are viewed upon report of a possible crime or College policy violation. Information obtained from the cameras will be used exclusively for the investigation of alleged criminal matters and College policy violations. Public Safety staff and other authorized personnel, as determined by the AVP, PS will handle information with an appropriate level of security to protect against unauthorized access, alteration, or disclosure. All personnel with access to security cameras will be trained in the effective, legal, and ethical use of monitoring equipment.

Cabinet-level administrators may request live feed access to cameras for staff members to monitor locations in their functional area (e.g., athletics may be allowed to have live feed access to cameras in the gym). The AVP, PS, or their designee, must approve all requests for access. Any equipment used to view the live access feed must be placed in a location that maintains privacy.

For the purposes of an investigation, the AVP, PS may authorize the viewing or release of camera images in response to an alleged violation of College policy or criminal statute that has been reported to a College investigative office (e.g., Title IX, HR, Student Conduct, Public Safety). In cases where the alleged violation may implicate a College employee, the AVP, PS will first obtain the approval of the Vice President of Human Resources.

Public Safety will maintain a log of all instances of access to and use of recorded material external to the department (e.g., local law enforcement). The log will include the name of the person(s) to whom access was provided and the date. This log will be discarded in accordance with the College's retention schedule.

Requests for Records

Requests for records associated with security cameras, including but not limited to requests for camera footage, will be processed in accordance with applicable state and federal laws and College policy. Local law enforcement may request video recordings for active criminal investigations. The request shall be in writing and contain a case report related to the investigation. Recordings requested for preliminary investigatory purposes, where a suspect is unknown, will require a court subpoena. Kirkwood's General Counsel may be engaged before the release of any video recording. All request for video recordings must be approved by the AVP, PS or their designee.

Storage and Retention of Recordings

No attempt shall be made to alter any part of any video recording. Areas where security camera recordings are viewed and all camera hardware will be configured, to the extent possible, to prevent camera operators from tampering with or duplicating recorded information. All records related to security camera operations will be stored in a secure location, either on campus or through a cloud-based solution. Access to the storage location should be limited to those who have access to security camera feeds or employees authorized to perform infrastructure maintenance.

Kirkwood Community College will maintain all security camera records in accordance with the College's retention schedule.

Limitations

Access, monitoring, storage, and retention of records related to security camera use will be governed by:

- Family Educational Rights and Privacy Act (FERPA) regulations,
- Profession, ethical, and legal considerations.

Training

All public safety personnel or other College employees having access to the camera system will be trained in the technical, legal, and ethical parameters of appropriate camera use. Personnel will receive a copy of this procedure and provide written acknowledgement that they have read and understood its contents.

Request for Access

College employees who may utilize the camera system as part of their day to day work may request access to the system based upon need and approval. Each request will be evaluated based on the requestors need for access and work area. Request for access must be approved by Public Safety through the following process:

- Submit email request to Public Safety detailing the purpose of access and what cameras are needed.
- Public Safety will review each request and ensure access can be provided.
- Once approved, Public Safety will submit an IT ticket for the user to be provided with access to the Video Management Software (VMS).
- Public Safety will ensure the user is assigned proper levels within the VMS.
- Public Safety will provide training and a copy of this procedure to the user prior to access being granted.

Revision Log

Version Number	Date Approved	Approved by	Brief Description of Change
1	7/20/2021	Cabinet	New Procedure