

# HARVEY MUDD COLLEGE

## Video Surveillance Policy

The purpose of this policy is to establish parameters for the authorized use of video surveillance technology (“VST”) on Harvey Mudd College (“HMC” or “College”) premises to enhance the safety and security of persons and property, while respecting and preserving individual privacy. This policy does not imply or guarantee that VST will be monitored in real time twenty-four hours a day, seven days a week.

### I. General Principles

- A. HMC employs VST, such as closed-circuit television and cameras, to deter crime, promote personal safety, and protect property. VST is not used for purposes of evaluating employee work performance.
- B. Camera surveillance by HMC shall be conducted in a professional, ethical, and legal manner consistent with all federal and state laws and HMC policy, with due regard for reasonable expectations of privacy.
- C. The President’s Cabinet shall review proposals and recommendations for all fixed-location camera installations.
- D. The President or President’s Designee shall appoint someone to oversee HMC’s operation of VST equipment to ensure compliance with this policy and with all related IT policies such as the Policy on Safeguarding Confidential and Sensitive Information.
- E. Requests to review surveillance footage should be submitted to the Facilities Management Team.

### II. VST Placement

- A. Examples of areas subject to VST security surveillance include, but are not limited to, grounds, walkways, parking lots, building perimeters, entrances and exits, lobbies, corridors, receiving docks, special storage areas, laboratories, and locations where financial transactions are conducted.
- B. VST shall not be used to monitor private offices without the consent of the occupant. The only exceptions are those offices where VST equipment is used to secure money, documents, supplies, and high-value equipment from theft, destruction, or tampering.
- C. VST equipment shall not be placed inside restrooms, locker rooms, showers, dressing rooms, residence halls, or other areas where people have a reasonable expectation of privacy, except that the Dean of Students may authorize the temporary installation of VST equipment in residence hall corridors, courtyards, and lounges when, in the judgment of the Dean of Students, there is reasonable

cause to believe that the safety or security of individuals and/or property is at risk, or that College policy is being violated.

- D. VST equipment shall not be used to view private rooms or areas through windows beyond what can be observed with unaided vision.
- E. VST equipment shall not be used to intercept or record sound.
- F. HMC shall post in appropriate locations signage reading: “This Campus Is Subject To Video Surveillance For Security Purposes And May Or May Not Be Monitored” or “This Area May Be Subject To Video Surveillance.”

### **III. Use of VST Information**

- A. Information obtained through VST may be used for security and law enforcement purposes and for compliance with College policy, including in College disciplinary proceedings where appropriate.
- B. Information obtained through VST is considered confidential and must be handled with an appropriate level of security to protect against unauthorized access, alteration, or disclosure.
- C. Only specifically authorized individuals who are responsible for campus safety and security may monitor VST in real time. VST-recorded information shall be viewed by and/or disclosed only to authorized individuals for legitimate safety, security, and/or College-policy-compliance purposes.
- D. All digital media shall be stored on an HMC-designated secure location. Information shall be retained in compliance with the College’s Record Retention Policy and then the oldest segments shall be overwritten by the newest segments. Digital media may be retained for longer or transferred to portable media solely as part of an ongoing security/law enforcement investigation, disciplinary or legal proceeding, or other bona fide use.
- E. To the extent that video images create student records or personnel records, HMC shall comply with all applicable state and federal laws related to record maintenance, retention, and disclosure, including the Family Education Rights and Privacy Act (“FERPA”).

### **Policy Approvals:**

Approved by the President’s Cabinet on 12/8/2014.

## Video Surveillance Procedures

- Requests to have video surveillance footage reviewed should be submitted online at [https://hmc.formstack.com/forms/surveillance\\_video\\_review\\_request](https://hmc.formstack.com/forms/surveillance_video_review_request). Anybody may request a review.
- Requests will be reviewed by a member(s) of the HMC Facilities Management Team (Senior Director of Operations & Emergency Preparedness and Employee Safety, Senior Director of Facilities, or Director of Capital Projects).
- As needed, the Facilities Management Team may consult with Cabinet members, the Human Resources Office, legal counsel, and others regarding video surveillance requests.
- Once a request has been approved, it will be assigned to the Associate Director for Administration, who is responsible for overseeing HMC's operation of video surveillance technology.
- Sensitive requests will be communicated to the President's Cabinet or a designee for review and approval.
- An update on video surveillance requests will be provided to the President's Cabinet on a quarterly basis.