



CAMPUS SECURITY CAMERA SYSTEM

Effective Date: November 17, 2022

Responsible Office: University Campus Police

Division: Operations

I. PURPOSE/OBJECTIVE

The purpose of this policy is to govern the use of the campus security camera system that monitors and records public areas for safety and security purposes. This policy sets forth the procedures for requesting and implementing campus security camera equipment installation, and outlines the responsibilities for authorized access, dissemination, retention and disposition of these records.

Grambling State University (GSU) is committed to enhancing the quality of life of the campus community by integrating the best practices of safety and security with technology. A critical component of a comprehensive security plan is the utilization of a campus security camera system. The surveillance of public areas is intended to deter crime and assist in protecting the safety and property of the GSU community. This policy addresses the university's safety and security needs while respecting and preserving individual privacy.

II. STATEMENT OF POLICY

The Grambling State University Police Department (GSUPD), GSU Facilities Management Department, Information Technology Center (ITC), Campus Living and Housing and any other university authorized employees who have access to the campus security camera system are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

This policy applies to all personnel, departments, and colleges of GSU using security cameras and their video monitoring and recording systems. Security cameras may be installed to enhance the security and safety of either property or persons. Security cameras will be limited to uses that do not violate the reasonable expectation of privacy as defined by law. Where appropriate, the cameras may be placed campus-wide, inside and outside buildings, including common areas of student residential housing. Although physical cameras may be identical, functions of these cameras fall into three main categories:

- A. **Property Protection:** The main intent is to capture video and store data on a remote device so that if property is reported stolen or damaged, the

video may show the perpetrator. Examples: a computer lab, an unoccupied science lab or a parking lot etc.

- B. **Personal Safety:** The main intent is to capture video and store data on a remote device so that if a person is assaulted, the video may show the perpetrator. Examples: a public walkway or a parking lot etc.
- C. **Extended Responsibility:** The main intent is to capture live video stream in one area monitored by staff in close proximity. In this case, video may or may not be recorded. Example: a computer lab with multiple rooms and only one staff.

III. POLICY DEFINITIONS

Chief of Police: the head of GSUPD or his or her designee.

Closed Circuit Television (“CCTV”) - A television system in which the video signals are transmitted from one or more cameras to a restricted set of monitors.

Private areas - areas in which a person has a reasonable expectation of privacy, including, but not limited to, non-common areas of residence halls, bathrooms, shower areas, locker and changing rooms and other areas where a reasonable person might change clothes. Additionally, areas designed for the personal comfort of university employees or the safeguarding of their possessions, such as lounges and locker rooms as well as areas dedicated to medical, physical, or mental therapy or treatment shall be considered private areas for the purpose of this policy.

Public areas - areas made available for use by the public, including, but not limited to, campus grounds, parking areas, building exteriors, loading docks, areas of ingress and egress, classrooms, lecture halls, study rooms, lobbies, theaters, libraries, dining halls, gymnasiums, recreation areas, and retail establishments. Areas of the university in which persons would not have a reasonable expectation of privacy, but to which access is restricted to certain university employees, such as storage areas, shall also be considered public areas for the purpose of this policy.

Security camera - A camera used for monitoring or recording public areas for the purposes of enhancing public safety, monitoring restricted areas or equipment, to discourage theft and other criminal activities, and for preventing, investigating, and resolving incidents.

Security camera monitoring - The real-time review or watching of security camera feeds.

Security camera recording - A digital or analog recording of the feed from a security camera.

Security camera systems - Any electronic service, software, or hardware directly supporting or deploying a security camera.

IV. POLICY IMPLEMENTATION PROCEDURES

GSUPD has the authority to select, coordinate, operate, manage, and monitor all campus security surveillance systems pursuant to this policy. All departments using camera surveillance are responsible for implementing and complying with this policy.

All existing security camera systems are required to comply with this policy. Unauthorized or nonconforming devices will be removed as identified during the security camera assessment phase conducted by GSUPD.

1. Responsibility

- a. GSUPD, in coordination with ITC and the Facilities Management Department, is responsible for implementation of the Campus Security Camera policy for safety and security purposes.
- b. GSUPD shall coordinate the monitoring of all temporary or permanent security cameras on GSU campus.
- c. GSUPD and ITC shall provide surveillance security camera technical assistance upon request to departments before any quotes, orders or purchases for security cameras are made through the Purchasing Department.
- d. GSUPD and ITC shall monitor developments in the law, security industry practices and technology to ensure that camera surveillance is consistent with best practices and complies with all federal and state laws.
- e. GSUPD, the Facilities Management Department and ITC will review requests for camera installations for safety and security purposes. Requests for the installation of surveillance cameras shall be reviewed by the Chief of Police or designee.
- f. GSUPD will determine new camera locations and assess the location of existing cameras and/or incidents, as necessary. GSUPD will maintain a university map and location of the security camera system by type and/or function.
- g. GSUPD is responsible for overseeing the monitoring, testing and oversight of the campus security camera system.

- h. ITC is responsible for actual technology support services for the campus security camera system.
- i. The Facilities Management Department is responsible for coordinating the actual installation of security cameras.
- j. GSUPD will review any complaints received regarding the utilization of the campus security camera system to determine whether a policy violation has occurred. Appeals of a decision made by the GSUPD will be made to and reviewed by the Chief Operating Officer for decision.
- k. Anyone who tampers with or destroys campus security camera equipment will be subject to disciplinary action, criminal prosecution and/or campus judicial action in accordance with the University's Code of Conduct.

2. Authorization & Installation

- a. Once an individual (the requester) has determined that the proposed camera installation is for safety and security purposes, the requester must obtain initial approval from their respective department dean or vice president, to include: the location of the proposed campus security camera equipment; the specific security related business purpose; and identify the source(s) of funding for purchase of the proposed campus security camera equipment.
- b. After initial approval is obtained, the requesting department, program, campus organization, or campus vendor must submit a Camera Request Form for the proposed camera installation to GSUPD.
- c. GSUPD will coordinate with ITC to process the assessment request, and ITC will provide the requester with the assessment results and an estimate of required expenses, including hardware, storage requirements and continued maintenance. ITC will secure and survey network access.
- d. Campus security camera assessments will be completed by the GSUPD, as requested, to identify potential threats and security vulnerabilities, the probability of occurrence or impact of an event, and security risk.
- e. Upon receipt of the assessment results, the requester must forward the results and estimate of required expenses to their respective vice president, dean or designee for final approval.

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- f. ITC is responsible for advising departments on appropriate applications of campus camera technologies and for providing technical assistance to departments that are preparing proposals for the purchase of campus security camera equipment.
 - g. All new campus security cameras must connect to the university's centralized surveillance system and must adhere to current university standards for equipment and equipment maintenance.
 - h. The installation of inoperable "dummy" cameras is prohibited.
 - i. Installers must restore the fire protection rating of any exterior wall that is penetrated during the campus security camera installation process.
 - j. Security cameras will not be installed in areas in which there is a reasonable expectation of privacy, including, but not limited to, restrooms, student residence hall rooms, medical patient rooms, and locker rooms.
 - k. Unless being used for criminal investigations, all campus security camera equipment will be visible.

3. Access and Monitoring

- a. Not all campus security cameras are monitored continuously, but they may be monitored by the GSUPD for legitimate safety and security purposes, including, but not limited to, high-risk areas or restricted access areas/locations, in response to an alarm, special events, and for specific investigations.
- b. Campus security cameras installed for protection of property and personal safety, access to live or recorded camera footage are restricted to authorized department personnel. In order to request access to the campus security camera system, users must submit a Camera Monitoring Access Request Form to the GSUPD. This form requires that the requester provide the justification for monitoring specific cameras and must be approved and signed by the respective vice president, dean, or their designee.
- c. The GSUPD will review all requests regarding the release or review of recorded images obtained through campus security camera monitoring.
- d. The release or review of recorded images in response to a Louisiana Public Records Act request (Louisiana Public Records Act § 44:36 et seq.) requires prior authorization from the GSUPD's records manager

and the Chief Compliance Officer. The release or review of recorded images for law-enforcement purposes requires prior authorization from the GSUPD's investigations division or their designee and the Chief of Police. The release or withholding of such records must be made in accordance with applicable law, and in consultation with University Counsel, as needed.

4. Appropriate Use and Confidentiality

- e. All information and/or observations made in the use of campus security cameras is considered confidential. Personnel are prohibited from using or disseminating information acquired from campus security cameras, except for official university and law enforcement purposes. Camera control operators will monitor cameras based on suspicious behavior, not individual characteristics, unless individual characteristics have been reported in the context of a criminal investigation and are relevant to such investigation.
- f. The campus security camera system may not be used to unlawfully harass, intimidate, or discriminate against any individual or group.
- g. Security camera recordings may not be used in the course of personnel investigations, such as those related to, but not limited to, workplace attendance or work quality, unless approved by the Director of Human Resources or their designee. The use of campus security camera recordings for any purpose not described herein is subject to review by the Chief Operating Officer.
- h. All camera installations are subject to federal and state laws.

5. Storage, Retention, Disposal of Recordings and Maintenance

- a. All recorded videos will be stored, retained, and disposed in accordance with the Louisiana Public Records Act (see Louisiana Public Records Act LA R.S.44:36 et seq.) and/or Louisiana Records Retention Laws; LA R.S. 44:411 et seq.) as deemed applicable.
- b. All recorded videos will be stored for a minimum of thirty (30) days, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use, as approved by the Chief of Police or their designee.
- c. All recorded videos will be tracked and stored in a secure location and can only be accessed by authorized personnel.
- d. Individual departments shall not store video surveillance recordings.

- e. The GSUPD and ITC are responsible for coordinating the resolution of any maintenance issues with installed cameras.

6. Exemptions

- a. This policy does not apply to the following:
 - 1) Security cameras installed by authorized financial institutions to monitor ATM machines.
 - 2) Recordings from cameras whose primary function is not security related, such as public performances or events, interviews, research, or for broadcast or educational purposes. Examples of such excluded activities include: videotaping of classroom lecture(s), athletic events for post-game review, videotaping of concerts, plays and experiments, or videotaped interviews.
 - 3) This policy does not apply to cameras used for academic purposes. Cameras that are used for research would be governed by other policies involving human subjects and are, therefore, excluded from this policy.
 - 4) Webcams used for general use by the university.
 - 5) Lawful individual use of cameras.

7. Training

- a. Camera control operators shall be trained in the technical, legal, and ethical parameters of appropriate camera use.
- b. Camera control operators shall receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.

8. Forms

- a. Camera Request Form
- b. Camera Monitoring Access Request Form

V. POLICY RELATED INFORMATION

- Acceptable Use, Information Technology
- University Code of Conduct

- General Rules of Conduct
- The Student Code

VI. REVISION/REVIEWED