

Randolph College Policy Proposal/Revision Cover Sheet

(Text will re-size as you type)

POLICY NAME	PROPOSAL TYPE	NAME OF LEAD POLICY DRAFTER
	New policy	
	Revision to existing policy	
	Retirement of existing policy	
BRIEF POLICY DESCRIPTION	POLICY TYPE	OTHER INDIVIDUALS INVOLVED
	Standalone	
	Part of Larger Policy Document:	
	RESPONSIBLE DEPARTMENT OR OFFICE	ORIGINAL SUBMISSION DATE
		DESIRED IMPLEMENTATION DATE

BRIEF RATIONALE FOR POLICY

Include any external mandates, regulations, accreditation factors, reporting, etc.

DEPARTMENTS OR OFFICES OF THE COLLEGE IMPACTED

EXISTING COLLEGE POLICIES IMPACTED BY OR OVERLAPPING THIS ONE

OFFICES RESPONSIBLE FOR FIVE-YEAR POLICY REVIEW

Include brief description of how five-year policy review will be conducted.

ASSUMING PASSAGE, YEAR AND TERM OF FIRST FIVE-YEAR REVIEW: _____

RESOURCES NECESSARY FOR IMPLEMENTATION

Include necessary training as well as operational costs.

NEW COMMITTEES OR GROUPS NECESSARY FOR IMPLEMENTATION

Describe the composition of necessary committees.

APPROVAL TIMELINE

Entering a name and approval date below signifies that written approval has been communicated.

<i>Approval Stage</i>	<i>Name</i>	<i>Approval Date</i>
(1) Direct Supervisor of Lead Policy Drafter (if applicable)	_____	_____
(2) Appropriate President's Leadership Team (PLT) Member (if other than policy drafter)	_____	_____
(3) First PLT Approval (prior to Public Comment Period)	_____	_____
(4) Second PLT Approval (following Public Comment Period)	_____	_____
(5) Board of Trustees (if applicable)	_____	_____

BEFORE SUBMISSION TO THE PLT, ENSURE THAT ● THIS FORM IS FULLY COMPLETED (I.E., IF A QUESTION IS NOT APPLICABLE, PLEASE INDICATE THAT); ● THE *APPROVAL TIMELINE* DIRECTLY ABOVE IS COMPLETED THROUGH STEP 2; ● IN THE POLICY ITSELF, (A) ALL SPECIALIZED TERMS ARE CLEARLY DEFINED AND (2) AN APPEALS PROCESS IS ADDRESSED AS APPROPRIATE.

VPIE COMPLETES UPON FINAL APPROVAL

Date of final approval _____
Date policy goes into effect _____
Individual responsible for implementation _____

Closed Circuit Television Camera, Monitoring, and Recording Policy

Randolph College is committed to providing a safe environment by incorporating the best practices of campus security with state-of-the-art technology. A critical component of a comprehensive security plan is the use of Closed-Circuit Television (CCTV). Such technology is capable of monitoring and recording campus activity. Recordings are made in video format only; no audio is recorded.

I. Purpose

The purpose of this policy is to regulate the use of closed-circuit television (CCTV) cameras to monitor and record public areas for the reason of safety and security.

II. Scope

This policy applies to all personnel of the College, including contract personnel acting as agents of the College, students, faculty, staff, and departments within the Randolph College community in the use of CCTV monitoring and recording.

III. General Principles

A. The purpose of CCTV monitoring is to deter crime and to protect the safety and property of the Randolph College community in accordance with existing College policies. Monitoring of public areas for safety and security purposes at the College is limited to uses that do not violate a reasonable expectation of privacy. In Virginia, employers may use video surveillance in areas that there is no expectation of privacy, such as break rooms, hallways, stairwells, dining areas, lounges, conference rooms, offices, and classrooms. Employers are prohibited from surveilling employees by video in locations where there is an expectation of privacy, such as bathrooms, locker rooms, or changing/dressing rooms. Images and related data collected by CCTV are the property of Randolph College. Safety and security purposes include, but are not limited to:

- Protection of individuals, including students, staff, faculty and visitors.
- Protection of College owned and/or operated property and buildings, including building perimeters, as defined by the CCTV Committee.
- Verification of alarms and access control systems.
- Visual patrol of common areas and areas visible to the public, including pedestrian walkways, stairways, and steps.
- Investigation of criminal activity and serious disciplinary violations, such as research project sabotage, in accordance with this policy.

Any diversion of security technologies for purposes other than the safety and security purposes reflected in this policy is prohibited.

B. CCTV monitoring will be conducted in a professional, ethical, and legal manner. Campus Safety Department personnel involved in monitoring will be appropriately trained and supervised in the responsible use of this technology. Any violation of this policy may result in disciplinary action as regulated by Randolph College.

C. Monitoring shall be performed in a manner consistent with all existing College policies, including non-discrimination, sexual harassment, and other relevant policies. Monitoring based upon characteristics and classifications such as race, gender, sexual orientation, national origin, ethnicity, or disability is prohibited.

Information obtained via CCTV monitoring will be used only for safety, security, or law enforcement purposes, and may only be released when approved by the Director of Campus Safety and/or the Provost and Dean of Students.

D. Monitoring shall be limited to uses that do not violate the reasonable expectation of privacy. This policy does not imply or guarantee that CCTV equipment and/or cameras will be monitored constantly in real time. Unless the camera is being used for investigations or other specific security purposes, monitoring by security cameras in the following locations is generally prohibited:

- Interior office spaces other than cameras utilized to monitor access and waiting areas
- Interior of classrooms

E. The CCTV Committee may review and amend this policy at any time, provided that proper notice is given to the College community of the revision.

IV. Responsibilities

A. The Director of Campus Safety has the responsibility to authorize, oversee and coordinate all CCTV monitoring for safety and security purposes.

B. The Department of Campus Safety is authorized to oversee and coordinate the use of CCTV monitoring equipment at the College. Information Technology (IT) and/or a selected vendor registered with the Virginia Department of Criminal Justice Services will provide guidance with equipment, software, and programming matters.

C. The Director of Campus Safety will stay abreast of new developments in the law, industry standards and precautions related to CCTV usage and monitoring.

D. A CCTV Committee was formed to monitor the use of cameras on campus and to make all decisions regarding their placement and use. The Committee will be comprised of 1) the Director of Campus Safety; 2) the Provost and Vice President for Academic Affairs; 3) the Dean of Students; 4) the Vice President for Finance and Administration; 5) one member of the FRC

appointed by the chair; and 6) two non-voting students appointed by the Student Government Association. The Committee will report to the Randolph community on an as needed basis. The Director of Campus Safety and senior leadership, as deemed appropriate, may be the only committee members involved in sensitive investigations.

E. Requests for video review by disciplinary, adjudicatory, or internal organizations of the College should be forwarded to the Committee for consideration prior to release, if allowed. The Provost, Dean of Students, or Director of Campus Safety, will make the final decision regarding the appropriateness of releasing the recordings, weighing the concerns of the disciplinary official or committee making the request against privacy interests and safety and security of the entire community.

V. Procedures

A. All operators and supervisors involved in CCTV monitoring will perform their duties consistent with the policy developed by the College.

B. The Department of Campus Safety and Department of Information Technology will limit camera positions and views of residential housing areas in compliance with the policy. Any view will not violate the standard of a reasonable expectation of privacy. The CCTV monitoring center located at the Reception and Information Desk will be configured as such to prevent the tampering with or duplication of information or data.

C. Recorded video media will be maintained for a period not to exceed 30 days locally, after which time the information will be overwritten automatically, unless retained as part of a criminal investigation or court proceeding (civil or criminal), or other bona fide use as approved by the Director of Campus Safety.

D. CCTV operators may only review recordings under the supervision of the Director of Campus Safety or with the approval of the CCTV Committee to maintain the integrity of the recording/data.

E. CCTV operators will be trained in the technical, legal, and ethical parameters of appropriate camera and equipment use. Operators will receive a copy of this policy and provide written acknowledgement that the document was reviewed and understood.

F. CCTV operators shall not monitor individuals based upon characteristics of race, gender, ethnicity, sexual orientation, disability or other classifications protected by College policies. Operators will monitor activity based upon suspicious or unsafe behavior, not individual characteristics.