

Curry College

Policy for Responsible Installation and Use of Video Security Cameras on Campus

Purpose and Scope

This Policy provides for the responsible installation and use of security cameras on the Curry College campuses. This Policy seeks to balance the safety and security of the College community with reasonable and legitimate individual privacy rights and interests.

This Policy is not intended to address the use of video equipment for academic, media, or operational purposes. Thus, recording of public events, lectures, athletics and performances; College-sponsored “webcams”; pedagogical, research and laboratory use of video recording; video monitoring of mechanical equipment; or, other filming for purposes unrelated to campus safety and security are not regulated by this Policy.

Additionally, this Policy shall not apply to monitoring equipment installed and maintained on Curry College campuses by third parties. Examples include equipment installed in ATMs by sponsoring banks.

Responsible Parties

The following College officers or their designees may perform the following Policy-related duties, or other related duties as assigned or required of the position:

Director of Public Safety – Maintains general oversight for the College’s implementation and use of video security cameras, consistent with the College’s leadership structure.

Vice Presidents for Student Affairs, Human Resources and Finance – senior administrators authorized to access video image data for legitimate institutional purposes.

Chief Information Officer – senior administrator authorized to access video image data and related systems for legitimate institutional purposes; provides technical input on the location and use of campus video security cameras.

Director of Buildings and Grounds – provides input on locating video security cameras on the College’s campuses; authorized to access video image data for legitimate institutional purposes.

Other Senior College Administrators – may also have access to video image data or provide input on issues related to the installation or use of video security cameras on the College’s campuses, as determined by legitimate institutional purposes.

Policy

In its sole discretion, Curry College may decide to install security cameras on its campus to advance legitimate institutional public safety and security interests including, without limitation:

- Protection of individuals, property and buildings
- Investigation of criminal activity
- Monitoring of access control systems
- Confirmation of security and safety alarms
- Situational awareness of campus events

The use of security cameras is to be conducted at all times in accordance with this Policy and with other relevant College policies, and according to any applicable federal, state and local laws and regulations. This Policy establishes limits on the use of video security cameras and recordings generated by such equipment in order to protect the reasonable and legitimate privacy interests of the College community and visitors to the campus.

The collection of audio recording data shall not be authorized by means of video security cameras installed or used pursuant to this Policy, unless otherwise required to do so by law or regulation, or for law enforcement reasons in compliance with Massachusetts law, or in the interests of a legitimate institutional purpose related to the safety and security of Buildings & Grounds operations or facilities management.

Procedures

1. Placement of Permanent Equipment.

Except as otherwise authorized under this Policy, permanent cameras are to be installed only in circulation spaces, common areas, and areas dedicated to College operations. Cameras shall not be installed in -- nor positioned to view through the windows of or entryways to -- areas where individuals have a reasonable and legitimate expectation of privacy, such as private offices, spaces dedicated to health and counselling services, residence hall rooms, locker rooms, bathrooms and classrooms. Locations shall be selected from time to time by the Director of Public Safety. The Director of Public Safety shall maintain a listing of all camera locations.

Signage or other forms of notice, specific or general, stating the presence of video cameras is permitted by this Policy, but not required. Camera locations shall not be camouflaged or otherwise deliberately concealed unless specifically requested by the Director of Public Safety after consultation with College Counsel.

2. Special Investigatory Equipment.

In response to specific campus safety or security concerns as determined by the Curry College Public Safety Department, the Director of Public Safety may install cameras on a temporary basis after consultation with the Vice President of Student Affairs or the Vice President of Finance. Temporary installations shall be removed by the date specified by the Director of Public Safety in any such consultation, unless extended upon further consultation.

Cameras shall not be installed for the purpose of monitoring the routine workplace behavior of College employees, except as part of an ongoing investigation of criminal activity by Curry College Public Safety Department or other law enforcement agency, or as part of an investigation of workplace misconduct posing a threat of harm to members of the College community. In either case, the Director of Public Safety shall consult with the Vice President of Human Resources and the College Counsel prior to installation.

3. Storage, Disposition and Release of Recorded Images.

Recorded video images will be stored for a period generally not to exceed 30 days and thereafter will be erased, "overwritten," or otherwise destroyed, unless retained as part of an active police investigation, or subject to a valid court or agency preservation order, a College litigation hold, or needed for training purposes. In certain circumstances as occasioned by the College's Academic Calendar (i.e., Winter Break), the Director of Public Safety may elect to store video image data in excess of the 30-day period provided by this Policy in order to maintain the safety and security interests of the College community.

Recorded video image data will be stored in a secure manner and shall only be accessible to authorized personnel. Access to video recordings should be limited to those personnel with a reasonable need for such access in a particular case.

Generally, the Director of Public Safety may release video data to College administrators as follows:

- To the **Office of the Dean of Students** in connection with an adjudication of an alleged violation of the Student Code of Conduct for which disciplinary charges have been issued.
- To the **Vice President for Human Resources** in connection with the investigation of workplace misconduct of a threatening or criminal nature.
- To **senior College administrators** to assist in the assessment of and response to actual or threatened criminal activity or other campus emergencies and/or exigent circumstances. Emergencies may include situations affecting the life, safety or health of any person, or theft, or the destruction of property.
- To **senior College administrators** for the purpose of monitoring facilities or construction operations on the College's campuses, or for any other legitimate institutional purpose not limited by this Policy.
- To **vendors or consultants**, as authorized by the Chief Information Officer or Director of Public Safety for the purpose of maintaining, managing or inspecting the operation of campus video cameras and related technology.

In consultation with the College Counsel, the Director of Public Safety may also release video data as follows:

- To **federal, state or municipal law enforcement agencies** for purposes of investigation or prosecution of criminal activity.
- To **third-parties** for purposes related to legitimate safety concerns, e.g. to aid in locating missing persons.
- To parties named in **subpoenas or court orders** requiring production, but in conformity with requirements of any relevant laws and regulations, and after consideration of the advisability of an opposing motion to prevent or limit release. Nothing in this paragraph shall be deemed to restrict the use of video recordings by the College in the defense of legal actions or other proceedings brought against it.

4. Monitoring of Cameras.

As provided by this Policy, the installation of security cameras on the College's campus are intended to collect information related to community safety and security concerns. During normal operations, the College does not intend to conduct "real-time" or "live" monitoring of camera footage.

As provided by this section specifically and this Policy generally, the Director of Public Safety or designee may authorize "real-time" monitoring of camera feeds. Generally speaking, identified safety or security concerns, event monitoring, ongoing investigations, alarms or other emergency or exigent circumstances may be a basis for authorizing "real-time" monitoring of camera feeds.

"Real-time" monitoring, when authorized, shall comply with the following:

- Monitoring shall be performed by Curry College Department of Public Safety personnel trained on principles of appropriate live camera use. Such individuals shall receive a printed copy of this Policy and shall provide written acknowledgement that they have read and understood its contents.
- Monitoring shall be based on suspicious behavior, not individual characteristics. Personnel will not monitor individuals based on characteristics of race, religion, color, sex, age, ethnic or national origin or ancestry, physical or mental disability, pregnancy, sexual orientation, gender identity or expression, genetic information, veteran or military status, membership in the Uniformed Services, or any category protected by applicable state and federal laws (as described in the College's Statements of Non-Discrimination in the [Employee Handbook](#) and the [Student Handbook](#)).
- Consistent with the provisions of this Policy, personnel shall not attempt to view spaces, such as residence hall rooms, locker rooms, bathrooms or similar, where inhabitants have a reasonable and legitimate expectation of privacy. Open or unobstructed windows or entry ways shall not constitute an exception to this prohibition. Additionally, and without regard to location, personnel shall not seek out nor engage in live monitoring of individuals engaged in intimate acts.

- Monitoring shall be conducted in the Curry College Public Safety Communication Center and through other means approved by the College. Access to monitoring locations or capability shall be strictly limited to trained personnel, and such personnel are strictly prohibited from tampering with, duplicating, downloading or transmitting by email or other means recorded video information.
- Personnel that violate guidelines set out in this Policy may be subject to disciplinary action up to and including termination, and possible legal action (including criminal or individual civil liability) where appropriate.

5. Petitions for Removal of Cameras.

Students, faculty and staff members may petition the Director of Public Safety in writing to remove a permanent surveillance camera, identifying the contested location and articulating the reasons for such request. The Director shall review any such petitions and shall render a decision by weighing the relative importance of the security concerns at the location in question and concerns outlined in such petition.

Policy Version: 1.0
Implemented: August 28, 2017
Replaces: New
Review by: August 28, 2020