Policy Number 05.01.002

Allegany College of Maryland

VIDEO SURVEILLANCE POLICY

Approved by Board of Trustees Date: February 2016
Revised 12/13/2024
Type of Policy: Security - Discretionary

BACKGROUND AND PURPOSE

Allegany College of Maryland is committed to providing a safe environment by integrating the best practices of public and private security with state-of-the-art technology. A critical component of a comprehensive security plan is video cameras and surveillance – a technology that can monitor and record activity on campus.

The purpose of this policy is to provide guidelines for the use of video surveillance on ACM property in a way that enhances security but also respects a reasonable expectation of privacy.

POLICY

I. SCOPE OF THE POLICY

This policy applies to all ACM students, faculty, and staff, as well as visitors and guests to the college.

II. POLICY STATEMENT

The Campus Security and Public Safety Department is authorized to oversee and coordinate the use of all video equipment for safety, security and investigative purposes at the College and may review and monitor security camera feeds and recordings as needed to support investigations and to enhance public safety. The Director of Campus Security and Public Safety, authorized College personnel, and law enforcement personnel may monitor and review video information for legitimate safety, security, and/or investigative purposes. Such authorization may be limited to designated video equipment or situations. Other college personnel may be authorized by the Director of Campus Security and Public Safety or the President of the College to monitor and review video information if it has been determined there is a legitimate security purpose. Unauthorized access to the use of video equipment is prohibited.

The purpose of video surveillance monitoring is to deter crime and misconduct and to assist in protecting the safety and property of the college community. Safety, security and investigative purposes include, but are not limited to:

- Enhancing the protection of individuals, including students, faculty, staff and visitors;
- Enhancing the protection of college-owned and/or operated property and buildings, including building perimeters, parking lots, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, and cashier locations;
- Patrolling of common areas and areas accessible to the public;
- Investigating criminal activity and disciplinary activity in accordance with this policy.
- Deterring and detecting academic dishonesty.

A. Any use or diversion of security technologies for purposes other than academic integrity, safety, security and investigative purposes is prohibited. Video surveillance monitoring will be conducted in a professional, ethical and legal manner. Personnel involved in monitoring will be appropriately trained and supervised in the responsible use of this technology. Authorized personnel are permitted to be present where monitors are located to conduct legitimate college business.

B. Information obtained through video recording and/or monitoring will be used for security and law enforcement purposes, for compliance with college regulations, and applications of college procedures. Information obtained through video recording/monitoring of law enforcement or security nature will only be released when authorized by the Director of Campus Security and Public Safety or the College President.

C. Video monitoring for security purposes will be conducted in a manner consistent with all existing college policies and procedures. The College strictly prohibits video monitoring based on race, age, gender, sexual orientation, national origin, disability or any other protected class.

D. Video monitoring shall not be used to evaluate employee job performance or for any surveillance purpose contrary to this policy.

E. **Video monitoring of areas for security purposes at the College is limited to locations that do not violate the reasonable expectations of privacy as defined by law.** Pursuant to Maryland law, security cameras may not be used in private areas of the campus unless advance notification is given to any individual entering the private area.

F. All video camera installations will be visible except when covert surveillance is justified by the Director of Campus Security and Public Safety and authorized by the Vice President of Finance and Administration or by the College President, as outlined below, in Procedures (11).

G. Video monitors may be visible. Reasonable steps will be taken by authorized personnel to prevent the routine or lengthy viewing of monitors (as well as any recordings) by unauthorized persons. Incidental viewing of monitors by unauthorized personnel will not be deemed a violation of this policy.

H. Video equipment used primarily to preserve academic integrity is subject to the same policy provisions as well as these specific guidelines:
   - The cameras will be overseen and coordinated by Campus Security and Public Safety; however, authorized personnel within the department or unit utilizing the equipment (such as testing labs and other academic settings) will have access to monitor those cameras within their control.
   - When video equipment used primarily for academic integrity captures a criminal, security or misconduct event, the Campus Security and Public Safety Department will be notified immediately. The Campus Security and Public Safety Department will assume responsibility for directing the monitoring and recording of information.

III. Procedures

1. Personnel involved with the use of video equipment and systems will perform their duties in accordance with all college policies and procedures.
2. All video surveillance records are the sole property of the College. Reproduction of the college video surveillance recordings is prohibited unless authorized by the Director of Campus Security and Public Safety or College President. Unauthorized personnel are prohibited from using and/or disseminating any information acquired from the video equipment. All information and/or observations made in the use of the video surveillance equipment are considered ***CONFIDENTIAL*** and can only be used for official college and law enforcement business upon the approval of the Director of Campus Security and Public Safety, College President or the respective department head if it applies to academic integrity information.

3. Signage will be posted at appropriate campus entrances indicating that video surveillance is used to promote safety at the college. The placement of the signs will be determined by the Director of Campus Security and Public Safety. Signage will state:

THIS FACILITY EMPLOYS VIDEO SURVEILLANCE EQUIPMENT FOR SECURITY PURPOSES.

4. Recorded events are stored temporarily, unless retained as part of a criminal investigation, court proceedings (criminal or civil), College disciplinary proceedings, or other bona fide use.
5. The system is configured to retain footage for 30 days and then footage will be recycled.
6. Cameras may be monitored for legitimate safety and security purposes that include, but are not limited to, the following: high risk areas, restricted access areas/locations, cash transaction areas, in response to an alarm, at times and locations that have previously experienced violations, special events, or specific investigations upon reasonable cause.
7. Should monitoring reveal activity that violates laws or policy, an investigation will be initiated.
8. Persons whose images are captured on the video will not be provided copies of the images except as required by law. In the event of an internal investigation, the person whose image has been captured can review the video footage with authorized personnel.
9. The College will not release the images to any third party except as authorized by the Director of Campus Security and Public Safety or the College President, or as permitted by law.
10. The College may release images to third parties as authorized by the Director of Campus Security and Public Safety or the College President, or as permitted by applicable federal and/or state law, such as in response to court orders or subpoenas and to law enforcement personnel as part of an ongoing investigation relating to college incidents and personnel. Recorded data may also be shared interdepartmentally for legitimate access needs, such as disciplinary proceedings against students or employees.
11. In an effort to combat any patterns of criminal activity, either by deterring the activity or apprehending violators, the College may use video equipment for covert surveillance purposes. As previously noted, the cameras will not be installed in any area that would violate the reasonable expectations of privacy as defined by law. No further announcement will be made prior to the actual placement of video equipment. Covert cameras with video recording equipment will only be used for investigations by the Campus Security and Public Safety Department or in cooperation with the police, and with the approval ~~of~~ the Vice President of Finance and Administration or the College President. The following procedures will be followed:

    a. The Director of Campus Security and Public Safety shall complete written justification for the installation and activation of a covert camera, including: the knowledge and/or allegation leading to the recommendation for the purpose of the camera, the specific location of the camera, the dates of operation, and the protocol for reporting the video evidence. The Director of Campus Security and Public Safety shall submit the written justification to the Vice President of Finance and Administration.

    b. The Vice President of Finance and Administration will review the written documentation and consult with the Director of Campus Security and Public Safety to discuss any questions or concerns. The Vice President of Finance and Administration may choose to discuss the legal ramifications with legal counsel. If the Vice President of Finance and Administration concurs with the need for the installation and activation of the covert camera, he/she will forward the

documentation to the President, and in student-related matters, the Dean of Student and Legal Affairs will also be alerted.

c. The video shall be reviewed periodically, at least once a day, by the Director of Campus Security and Public Safety or designee and a report of activity on the video forwarded to the Vice President of Finance and Administration. It shall be the responsibility of the Vice President of Finance and Administration or his/her designee to ensure the President and, in student-related matters, the Dean of Student and Legal Affairs is briefed on the video evidence. Upon request, the Vice President of Finance and Administration, the President, and/or the Dean of Student and Legal Affairs may view video footage obtained from the covert footage.

d. If the camera has been installed and activated as a result of a specific criminal investigation, it shall be the responsibility of the Director of Campus Security and Public Safety to ensure that the device is removed promptly at the end of the investigation but no later than the date specified on the original request.

e. The Vice President of Finance and Administration may notify the Human Resources Director at his/her discretion as to any covert camera operation regarding employees.

f. The Vice President of Finance and Administration may notify the Public Relations Office at his/her discretion as to any covert camera operation that is likely to necessitate the preparation of a public relations release for any resulting media inquiry or public relations issue.

g. It shall be the responsibility of the Vice President of Finance and Administration to determine if any other college personnel should be made aware of the installation and activation of the covert camera.

IV. Administration of Policy

The Campus Security and Public Safety Department is responsible for overseeing video monitoring and recording equipment and systems and associated policies, standards and procedures. This responsibility includes, but is not limited to, conducting an ongoing review of existing security camera systems, conducting an annual audit of authorized users and security access, determining any changes to ensure compliance with the policy, authorizing placement of security cameras, and ensuring operators are adequately trained. The Campus Security and Public Safety Department will also monitor new developments in the relevant law and in security industry practices to ensure that video monitoring at the College is consistent with the highest standards and protections.

The IT Department, under the direction and guidance of the Director of Campus Security and Public Safety, is authorized to access the video equipment for technical support purposes to include installing and configuring cameras and storing and maintaining passwords for cameras.

V. Changes

Substantive changes to this policy require approval by the Board of Trustees; editorial changes, title/position changes, and/or changes to its implementation procedures may be made as required by federal or state mandate and/or institutional need with timely notice to students and employees.