

Babson College Security Camera and Duress Device Policy

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Definitions

Security Camera System: Any video installation with capacity to view or record college owned or controlled spaces to assess safety and security.

Recording Systems: Recording systems referenced in this policy are the computerized information storage systems (DVR Digital Video Recording Devices) that are physically located and maintained by ITSD.

Duress Device: A duress device is frequently a physical device or button that is usually installed and concealed in a designated area or space that is connected to a monitoring station through Public Safety Communications Center. The alarm can be used to request emergency assistance from Public Safety.

Purpose and Scope

Babson College recognizes the importance of integrating technology with best practices for on-campus safety and security. This policy applies to all personnel and departments of Babson College relative to the use of security cameras, their monitoring and related recording systems. The purpose of security cameras is to observe and record certain public areas with the purpose of enhancing safety and security on campus. The Security Camera System will be utilized in a manner that does not violate reasonable expectations of privacy.

Information obtained from the Security Camera System shall be used for safety and security purposes and for investigations pertaining to violations of law and College policies. The specific functions of the Security Camera System includes deterrence, detection, property protection, personal safety, situational awareness and investigative assistance. The policy details procedures for installation, accessibility, monitoring, training, review and storage, dissemination, destruction of images and clearly addresses responsibilities surrounding the expectation of privacy. All reasonable measures must be taken to protect an individual's privacy and College information securely through established restricted access, appropriate storage, transmission, and deletion.

This policy does not apply to cameras used for other purposes including: recording of public performances or events, interviews, public relations events, academics, athletics, research, and observations of Automated Teller Machines. All such purposes and recordings that may be made

by outside law enforcement authorities pursuant to a court order are therefore excluded from this policy.

Babson College also recognizes the importance of risk assessment across campus and has identified areas/departments on campus that may benefit from a duress device to assist in sending an immediate emergency response request to their location without picking up a phone or calling for help. The device will immediately notify the Public Safety communications center that assistance is needed at a pre-determined location.

Responsibility

All existing Security Cameras and Security Camera Systems and Duress Devices and supporting personnel must comply with this policy.

The Babson College Public Safety Department has the responsibility and authority to coordinate with the Information Technology Services Department (ITSD), as well as other College officials identified herein, in order to effectively select, coordinate, operate, manage, and monitor the College's Security Camera Systems and Duress Devices pursuant to this policy.

Public Safety and ITSD will review all requests, proposals, and recommendations for Security Camera installations and Duress Devices, the proposed locations, and related infrastructure needs. The Director of Public Safety has the authority to approve, reject or modify the foregoing.

Public Safety shall:

- Monitor recommendations and changes in the security industry regarding the Security Camera System and Duress Device consistent with best practice and all applicable laws.
- Be responsible for monitoring the functionality of the Security Camera System on a daily basis and make appropriate notifications for service or maintenance needs.
 1. Security Camera: Public Safety initially will contact ITSD to assess the issue. ITSD in conjunction with Public Safety will decide to contact an outside vendor for further assistance if needed.
 2. Duress Device: Public Safety initially will contact ITSD to assess the issue. ITSD in conjunction with Public Safety will decide to contact an outside vendor for further assistance if needed.
- Be responsible for maintaining a master inventory of all Security Cameras and Duress Devices throughout campus. Be responsible for any complaints or

concerns regarding the misuse of the Security Camera System and Duress Devices and determine if the policy is being followed. If a violation has occurred, the Director of Public Safety will consult the General Counsel regarding an appropriate outcome. Misuse of the Security Camera System or any images captured thereby is a serious violation of this policy.

- Be responsible for monitoring the functionality and testing the duress devices while documenting and immediately following up on any maintenance issues.

Public Safety and ITSD will conduct a bi-annual evaluation of the Security Camera and Duress Device System.

Placement and Installation

All Security Cameras shall be located so that there is no violation of a reasonable expectation of privacy defined by law.

- No audio shall be recorded with the Security Camera System.
- Security Camera positions and views of residential housing shall be limited.
- Unless the Director of Public Safety provides prior approval, all Security Camera installations should be visible.
- The installation of non-operational Security Cameras shall be prohibited.

Any requests for Security Cameras or Duress Devices, including the justification for the request, shall be submitted to the Director of Public Safety. The Director of Public Safety will consult appropriate personnel regarding the proposed request and provide a response.

When considering whether to permit the installation of a Security Camera in a particular location, two primary questions to be considered by the Director of Public Safety are:

1. Is there a reasonable expectation of privacy in the proposed location, and
2. Is that expectation of privacy reasonable?

In Massachusetts, it's generally reasonable to expect that bathrooms and locker rooms are private. Parking lots, most outdoor areas, and public lobbies are generally viewed as public and one's expectation of privacy is minimal.

Whether an individual's office or particular hallways are "private" is dependent on a number of factors. Whether the space is perceived as private depends on how open the building and hallway is to the public. If anyone can enter the building at any time, and walk down the hallway, it is generally perceived as public space, with little or no reasonable expectation of privacy on the part of individuals when they are in that space. However, some interior corridors on campus could be reasonably considered private because the building and/or hallway are closed to everyone other than a small number of individuals. In the semi-public/semi-private areas the expectation of privacy is limited as one encounters others who also have proper access to the space. As a college rather than a corporation, our employees generally have a greater expectation of privacy than perhaps the typical community population. Therefore, if a camera was installed in this type of semi-private space, individuals with proper access to that space (such as faculty with offices) might consider the installation to be invasive of their privacy.

Thus, in addition to the reasonableness of privacy expectations, considerations include:

1. What is the purpose for the Security Camera surveillance?
2. Will the Security Camera be hidden or in view?
3. Will there be signage?
4. Will the Security Camera be monitored and by whom?
5. If monitored and a crime is seen, who will be notified, who will respond?
6. Will a tape be produced and how will it be secured, who will have access to the tape?
7. Where will the Security Camera be pointed (scope of view), will it capture computer screens, telephone keypads, part or all of the space?
8. How long will the Security Camera be in place?

Accessibility, Monitoring and Training

Images collected by the Security Camera System must be handled with an appropriate level of security to protect against unauthorized access, alteration or dissemination according to the law and college policy. All Digital Video Recording devices (DVR) and camera software monitoring equipment that is part of the Security Camera System will be stored in a secured location with restricted access to authorized personnel only. No attempt shall be made to alter any part of any Security Camera recording. Security Cameras centers and monitors will be configured to prevent Security Cameras from being tampered with or duplicating recorded information.

With the installation of Duress Devices all Public Safety personnel will be advised and trained on the placement and response procedures. Also those in the designated area/department will be provided with training and expectations regarding response.

College Security Cameras are not monitored continuously and are not guaranteed to be monitored in real-time.

All monitoring or recording by the college's Security Camera System will be conducted in a manner consistent with college policies and all state and federal laws. All monitoring and recording will be conducted in a professional, ethical and legal manner. Monitoring of the Security Camera System shall be consistent with the purpose and scope of this policy in that individuals or groups shall not be targeted. Department staff will not monitor individuals on the Security Camera System based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the College's Non-Discrimination Policy. Security Camera control operators will monitor activity based on suspicious behavior, not individual characteristics.

All personnel with access to the Security Camera System will have proper training and supervision with responsible use provided by the Public Safety Department. All personnel with access to the Security Camera System shall receive appropriate documented technical, legal and ethical training. All personnel will be provided with a copy of the policy and a signed acknowledgement of receipt.

Review and Storage

Personnel are prohibited from using or disseminating information or images acquired from the College's Security Camera System, except for official purposes. All information obtained and/or observations made via the use of the Security Camera System are considered confidential and may only be used for official College and law enforcement purposes upon the approval of the Director of Public Safety.

Other than supervisors, the only Public Safety Department staff authorized to play back recorded video is on-duty staff assigned to the communications center when searching for evidence of a recently reported incident in an attempt to identify possible perpetrators in order to provide responding and investigating officers with a description of suspects. The Security Camera System is configured so that all staff members who would potentially be working in the communications center (dispatchers, Community Service Officers, Police Officers) as well as Supervisors (Sergeants, Investigators and Command Staff) may access recordings for up to 30 days per policy.

No person outside the Public Safety Department shall be permitted to review recorded video without the express authorization of the Director of Public Safety or his/her designee. Supervisors can make exceptions to this restriction if there are exigent circumstances pertaining to health and safety. All such reviews shall be documented in writing.

No recorded video is to be downloaded to a portable storage device except by a supervisor or investigating officer in the course of an official investigation in order to preserve the recorded video as evidence. In such cases, the Public Safety Department's standard procedures for handling evidence shall apply.

All evidence and property management policies and procedures outlined in Chapter 28 of the Public Safety Policies and Procedures will be followed regarding the handling and storage of evidence that will apply.

Deletion and retention of security camera recordings

All Security Camera System recordings shall be stored in a secure College location for a period not exceeding 30 days and will then promptly be erased or written over, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other approved use as designated by the Director of Public Safety or his/her designee.

Release of Security Camera Recordings

The request for the release of any Security Camera System recordings must be directed to the Director of Public Safety or his/her designee. All legal documents (subpoena, warrant, court order) directing that access to security camera recordings be afforded to law enforcement agencies or judicial systems related to a criminal investigation will be directed to the Director of Public Safety or his/her designee and to the General Counsel. All requests or demands for access to recorded images captured on the security camera systems that are not connected to a criminal investigation but may be related to risk management or litigation purposes will be directed to College General Counsel.

Review Cycle

This policy will be reviewed biennially by representatives from the following offices and departments: Public Safety, General Counsel, Human Resources, Dean of Faculty, Student Affairs, Facilities and ITSD.