

Boston College
Use of Video Security Systems on Campus

Purpose and Scope

This Policy addresses the use of security cameras on the Boston College campus. It seeks to balance the safety and security of the University community with the privacy interests of all its members and guests, and is not intended to address the use of video equipment for academic, media, or primarily operational purposes. Thus, this Policy does not apply to the recording of public events, lectures, and performances; the use of University-sponsored webcams; uses of video recording for pedagogical purposes; video monitoring of mechanical equipment; or other filming for purposes unrelated to campus safety and security. Additionally, this Policy does not apply to monitoring equipment installed in automated teller machines (ATMs) by sponsoring banks. This Policy is intended to establish internal standards and procedures governing the use of security cameras on campus; it is not meant to create rights in any individual to seek redress for action inconsistent with the Policy.

Campus Security Committee

The Campus Security Committee shall consist of the following University officers or their designees: The Provost and Dean of Faculties, the Executive Vice President, the Vice President for Student Affairs, the Vice President for Information Technology, the Director of Public Safety, and the General Counsel. The Campus Security Committee shall assist in the implementation and interpretation of this Policy.

General Statement

Boston College deploys security cameras (hereinafter also referred to as “cameras”) on its campus to advance legitimate public safety and security interests, including, without limitation:

- Protection of individuals, property, and buildings;
- Investigation of criminal activity;
- Investigation of alleged misconduct, whether or not rising to the level of a criminal offense;
- Monitoring of access control systems;
- Confirmation of security and safety alarms; and
- Situational awareness of campus events.

The use of security cameras is to be conducted at all times in a professional, ethical, and legal manner in accordance with this and other relevant University policies, as well as any applicable federal and state laws.

Procedures

The Director of Public Safety shall ensure that the use of security cameras on the Boston College campus complies with the requirements of this Policy by implementing the following procedures:

1. Placement of Permanent Equipment. Except as otherwise authorized under this Policy, permanent cameras may be installed only in circulation spaces, common areas, and areas dedicated to University operations. Cameras shall not be installed in, nor positioned to enable viewing through the windows of

or entryways to areas where privacy interests are paramount, such as private offices, spaces dedicated to health and counseling services, residence hall rooms, locker rooms, and bathrooms. Locations shall be selected from time to time by the Director of Public Safety. Prior approval of camera installation by the Campus Security Committee shall not be required, provided that the installation adheres to the limitations established by this Policy. The Director of Public Safety shall maintain a listing of all camera locations and shall make such listing available to the Campus Security Committee.

2. Placement of Special Investigatory Equipment. To assist the Boston College Police Department in the monitoring and investigation of certain exceptional situations, the Director of Public Safety may make exceptions to the restrictions outlined above for the installation and use of special investigatory equipment, including cameras, on a temporary basis. If time allows, the Director of Public Safety shall consult with the Executive Vice President and the General Counsel prior to such installation. 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 workplace behavior of University employees, except as part of an ongoing investigation of criminal activity by the Boston College Police Department or other law enforcement agency, or as part of an investigation of workplace misconduct posing a threat of harm to the University community, when approved by the Vice President of Human Resources and the General Counsel.

3. Storage, Disposition and Release of Recordings. Security camera recordings will be stored for a period generally not to exceed 90 days and thereafter will be erased or “overwritten,” unless the recording is subject to a valid court or agency preservation order or a University litigation hold, retained as part of an active investigation, released and used for the purposes described below, or needed for legitimate training or other purposes, as may be determined by the Director of Public Safety or the General Counsel. Recordings will be stored on a secure server accessible to authorized personnel only, and will not be reviewed absent a legitimate institutional purpose. Relevant portions of recordings may be released by the Director of Public Safety as follows, upon request:

- To the Vice President for Student Affairs, the Dean of Students, or their designees in connection with an investigation or adjudication of an alleged violation of the Student Code of Conduct.
- To the Vice President for Human Resources and senior University administrators in connection with an investigation of alleged workplace misconduct.
- To senior University administrators to assist in the assessment of and response to actual or threatened criminal or nefarious activity, a pattern of recurring disturbances to the University community, a legitimate safety concern, or campus emergency.
- To federal, state or municipal law enforcement agencies for purposes of investigation or prosecution of criminal activity.
- To third-parties with a legitimate interest in a matter subject to a recording, or for purposes related to legitimate safety concerns (e.g. to aid in locating missing persons).
- To parties named in subpoenas or court orders requiring the production of recordings, as determined by the General Counsel.

All release requests for recordings must state the reason that the data is sought and specify the applicable date, time, and location for the requested recording. The portion of the recording released shall be limited to the extent necessary to accomplish the stated purpose.

Nothing in this paragraph shall be deemed to restrict the use of video recordings by the University in the defense of actual or threatened claims, legal actions, or other proceedings brought against it or the disclosure to appropriate University administrators who are directly involved in responding to such claims, actions, or proceedings.

4. Monitoring of Cameras. Neither the installation of security cameras nor this Policy constitutes an undertaking by the University to provide continuous live monitoring of all locations visible through such cameras. At the discretion of the Director of Public Safety, cameras may be monitored in “real time” only when safety or security concerns, event monitoring, ongoing investigations, alarms, or other situations warrant such monitoring. Any real time monitoring shall comply with the following:

- Monitoring shall be performed by personnel trained in the technical, legal, and ethical parameters of appropriate camera use, who will receive a copy of this Policy and 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, gender, ethnicity, sexual orientation, disability, or other classifications protected by the University’s non-discrimination Policy.
- Personnel will not spot and continuously view people becoming intimate in public areas and will not attempt to view private rooms or areas through windows.
- Monitoring shall be conducted in the Boston College Police Department Communication Center and through other means approved by the University. Access to monitoring locations or capability shall be strictly limited to trained personnel and equipment shall be configured to prevent such personnel from tampering with, duplicating, downloading, or transmitting by email or other means recorded video information.
- Monitoring personnel who violate guidelines set out in this Policy shall be subject to disciplinary action up to and including termination and possible legal action where appropriate.

Approved: William P. Leahy, S.J.

Date: April 22, 2016, rev. June 1, 2023