

Boston College
Responsible Use of Video Surveillance/Security Systems on Campus

Purpose and Scope

The purpose of this Policy is to outline guidelines for the responsible use of security cameras on the Boston College campus. This Policy seeks to balance the safety and security of the University community with the privacy interests of all its members and guests. This Policy is not intended to address the use of video equipment for academic, media, or operational purposes. Thus, recording of public events, lectures and performances; University-sponsored “webcams”; pedagogical, research and laboratory use of video recording; video monitoring of mechanical equipment; and other filming for purposes unrelated to campus security are not covered by the requirements outlined below. Additionally, this Policy shall not apply to monitoring equipment installed in ATMs by sponsoring banks.

Definition

Campus Security Committee—The Campus Security Committee shall consist of the following University officers or their designees: The Provost and Dean of Faculties, the Vice President for Student Affairs, The Vice President for Information Technology, and the University General Counsel.

Policy

Boston College deploys security cameras on its campus solely to advance legitimate 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 a professional, ethical, and legal manner in accordance with this and other relevant University policies, as well as any applicable federal and state laws. This Policy establishes limits on the use of surveillance equipment and video recordings generated by such equipment in order to protect the reasonable privacy interests of the University community and visitors to the campus.

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 University operations. Cameras shall not be installed in -- nor positioned to view through the windows of or entryways to -- areas where privacy interests are paramount, such as private offices, spaces dedicated to health and counselling services, residence hall rooms, locker rooms and bathrooms. Locations shall be selected from time to time by the Director of Public Safety and reviewed with the Campus Security Committee. 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. **Special Investigatory Equipment.** In response to specific safety concerns occasioned by recurring criminal behavior or other credible threat being monitored by the Boston College Police Department, the Director of Public Safety may install cameras on a temporary basis, after consultation with the Campus Security Committee, or, in the event of an emergency, the Executive Vice President and the University General Counsel. 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 members of the University community, in either case when approved by the Vice President of Human Resources and the University General Counsel.

3. Storage, Disposition and Release of Recorded Images. Recorded video images will be stored for a period generally not to exceed 90 days and thereafter will be erased or “overwritten,” unless retained as part of an active police investigation, or subject to a valid court or agency preservation order, a University litigation hold, or needed for legitimate training purposes. Recorded video images will be stored on a secure server accessible to authorized personnel only. Relevant video recordings may be released by the Director of Public Safety after consultation with the University General Counsel 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 University administrators to assist in the assessment of and response to actual or threatened criminal activity or other campus emergencies.
- 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 University in the defense of legal actions or other proceedings brought against it.

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 University cameras may be monitored in “real time” when safety or security concerns, event monitoring, ongoing investigations, alarms or other situations warrant such monitoring. Real time monitoring, when conducted, 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.

5. Petitions for Removal of Cameras. Students, faculty members or 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 with the Campus Security Committee, which shall render a decision by weighing the relative importance of the security concerns at the location in question and concerns outlined in such petition.

Approved: William P. Leahy, S.J.

Date: April 22, 2016