

AP 134c. Security Camera Video and Usage

Associated Board Policy: 134.00 – Campus Conduct

Procedure Owner: Executive Director of Student Services

Related Procedures: AP 134a – Campus Conduct, AP 134b – Guidelines and Leafletting

I. Procedure Scope and Purpose

These procedures establish the guidelines for the installation, operation, and management of security camera systems on Cowley College property. Their purpose is to enhance campus safety and security while upholding individual privacy rights and ensuring compliance with all applicable laws.

Security cameras at Cowley College are intended to:

- A. Enhance campus safety and protect people, property, and institutional assets.
- B. Deter criminal activity and support investigations of incidents that occur on campus.
- C. Balance security needs with the privacy rights of individuals in accordance with applicable federal and state laws, including but not limited to FERPA, the Fourth Amendment, and the Electronic Communications Privacy Act (ECPA).

These procedures apply to all security cameras and video management systems installed on Cowley College property. These procedures do **not** apply to cameras used solely for academic instruction, media production, or personal use by individuals, provided such use complies with other applicable college policies.

II. Definitions

College Grounds: Any property owned, maintained, or operated by the College, including buildings, structures, athletic facilities, parking lots, sidewalks, streets, and thoroughfares.

Public Areas: Areas accessible to the general public, students, or employees.

Private Areas: Spaces controlled by an individual or small group, such as private or semi-private offices or designated work areas.

Security Camera: A device used to monitor or record public areas to enhance safety, protect property, deter crime, and support investigations.

Security Camera Monitoring: Real-time viewing of camera feeds.

Security Camera Recording: A digital or analog recording of a security camera feed.

Security Camera Storage: Any device or system used to store recorded camera footage.

Video Management System (VMS): Software used to manage cameras, recording devices, and related security equipment.

III. Procedure

- A. Security Camera Installation

1. Cameras may be installed throughout campus when approved by the Director of Public Safety and the Administration, and when consistent with state and federal law. Cameras may not violate a person's reasonable expectation of privacy.
2. Cameras will not be installed for the purpose of evaluating personnel performance (e.g., attendance, work quality, academic conduct).
3. Recordings may be used when there is reasonable suspicion of policy or legal violations or for civil or legal proceedings. Recordings obtained in violation of these procedures may not be used in disciplinary actions.
4. Camera placement in residential housing is limited to shared spaces (entrances, hallways, staircases, study rooms, laundry rooms, kitchens, elevators). Cameras may not be placed inside dorm rooms.
5. Cameras are prohibited in private areas such as residence hall rooms, bathrooms, showers, locker rooms, changing rooms, private offices, and medical or counseling spaces.
6. Dummy or non-functioning cameras are not permitted.
7. Audio recording is prohibited. Kansas law prohibits recording private conversations without the consent of at least one party.

B. Security Camera Function

1. Cameras serve three primary purposes:
 - a. Property Protection: Supporting reports of theft or damage.
 - b. Personal Safety: Capturing incidents affecting personal safety.
 - c. Extended Responsibility: Detecting and deterring violations of college policy or law.
2. Cameras are not continuously monitored, but footage may be used to deter crime and support investigations.
3. Camera use is inappropriate when it infringes on privacy, covertly evaluates employees, or is used solely to "catch" violations.
4. Tampering with or destroying camera equipment will result in disciplinary and/or criminal action.
5. Individuals recorded violating college policy or law may face disciplinary action or be referred to law enforcement.

C. Access or Monitoring

1. The Public Safety Department manages and secures all recordings, with technical support from IT. When providing support, the IT Department may view live or recorded video for purposes of configuring, testing, maintaining, and troubleshooting the security camera system.
2. Security camera video shall not be viewed, accessed, or observed by any individual other than public security or law enforcement personnel acting in the performance of their official duties and in accordance with applicable law. Any reported violation of college policy or law shall be investigated by Public Safety personnel acting within the scope of their official duties.
3. When access to security camera footage is sought for purposes beyond authorized public safety or law enforcement functions, a written request must be submitted to Public Safety and copied to the appropriate Vice President. Individuals outside the Public Safety Department may view security camera footage only when they have an administrative duty to do so or have received prior authorization from an appropriate administrator.
 - a. The administrator (or designee) will approve or deny the request.
 - b. Incidents involving an employee action or violation of policy, the appropriate administrator and Human Resources shall be notified in a timely manner.
 - c. Notification will be sent to the Executive Director of Student Services when an outside law enforcement agency requests video security camera footage.
4. Monitoring and recording must comply with all college policies and laws and may not be based on protected characteristics.

5. Cameras may be monitored for legitimate safety and security purposes, including high-risk locations, alarm responses, special events, and investigations.
6. Monitoring and access are justified for:
 - a. Personal safety
 - b. Facility security
 - c. Property protection
 - d. Deterring crime and vandalism
 - e. Parking lot monitoring
 - f. Investigations
 - g. Supporting college policies
 - h. Remote viewing for authorized personnel
 - i. Verifying camera/storage functionality
 - j. Supporting the College's zero-tolerance violence policy
 - k. Enhancing—not replacing—Public Safety patrols
7. Only authorized Public Safety personnel or individuals approved by an executive administrator may access live or recorded video.
8. Exporting, copying, storing, duplicating, or retransmitting footage is limited to Public Safety personnel for approved purposes. All other recording methods are prohibited.
9. VMS server logs will be retained for at least one year unless preserved for an official investigation.
10. Recordings will be stored for at least 21 days unless retained for an investigation or authorized by the Director of Public Safety.

D. Confidential Use Guidelines

1. Information obtained from security cameras may only be used for official college or law enforcement purposes.
2. All information must be handled securely to prevent unauthorized access, alteration, or disclosure.
3. Camera recordings will not generally be released to the public, students, employees, or parents. Recordings that constitute student educational records are subject to FERPA. Requests from external entities—except for legitimate law enforcement requests or by order of a subpoena—will be reviewed by the Director of Public Safety and the President, with legal counsel consulted as needed.
4. Recorded images or video shall generally not be shared with any individual except upon administrative approval or when necessary to address a safety concern or threat.
 - a. When the identity of an individual is unknown or when a significant safety threat exists, images may be shared for identification or safety awareness.

Note: The exact location, number, and function of all cameras will generally not be released for security reasons.
5. These procedures shall not impose restrictions to the responsibilities of the Public Safety Department to view footage, when necessary, as part of an investigation.

E. Applicability

1. Unless explicitly exempted, these procedures apply to all personnel, departments, campus organizations, subsidiaries, residents, and public/private partnerships affiliated with the College and using security cameras or video monitoring systems in any college-owned or leased area.
2. These procedures do not apply to:
 - a. Security cameras used inside Public Safety offices or vehicles
 - b. Body-worn cameras
 - c. Video equipment used in criminal investigations
 - d. Covert video equipment used for non-criminal investigations involving significant safety or security risks
 - e. ATMs with built-in cameras

- f. Cameras used for academic purposes
 - Cameras used for research are governed by human-subject policies
- g. Webcams used for legitimate business purposes
- h. Cameras used to record public events, performances, interviews, or athletic activities

F. Governance and Responsibility

Public Safety Department

Responsible for oversight and operational management of all campus security camera systems:

1. **System Oversight:** Overseeing the selection, coordination, operation, management, and monitoring of all security camera systems.
2. **Interdepartmental Coordination:** Collaborating with the Information Technology Department—or an approved third-party provider—for network support and troubleshooting needs.
3. **Equipment Management:** Managing the installation, maintenance, replacement, and decommissioning of security cameras.
4. **Departmental Guidance:** Advising campus departments on the appropriate and lawful use of security camera technologies.
5. **Procurement Support:** Providing technical guidance and support for camera procurement, project planning, and related proposals.
6. **Review and Approval:** Reviewing and approving proposed camera types and installation locations to ensure compliance with college policies and applicable laws.
7. **Site Evaluation:** Evaluating new and existing camera locations based on operational needs and safety considerations.
8. **Testing and Repair Coordination:** Testing cameras, monitoring system performance, and coordinating repair or maintenance efforts as needed.
9. **Complaint Review:** Reviewing and responding to complaints or concerns related to camera placement, use, or system operation.
10. **Legal Consultation:** Consulting with legal counsel before releasing video records outside of recognized law enforcement channels.
11. **Compliance Monitoring:** Monitoring changes in law, technology, and industry best practices to ensure the college remains compliant and up-to-date.
12. **Policy Enforcement:** Ensuring all security camera system activities adhere to applicable laws, regulations, and college policies.

IT Department

Responsible for technical management and support:

1. **System Installation and Configuration:** Assisting with the installation of security cameras or related equipment, configuring network connectivity, and ensuring proper system functionality.
2. **Data Storage and Retention:** Managing the secure storage of video recordings, maintaining retention schedules in accordance with college policy and applicable laws, and ensuring stored data is protected against unauthorized access, alteration, or deletion.
3. **Maintenance and Troubleshooting:** Providing ongoing technical support, performing routine maintenance, addressing equipment malfunctions, and responding to operational issues to ensure continuous system performance.
4. **System Security:** Implementing measures to safeguard security camera systems from cybersecurity threats and unauthorized access.
5. **Coordination With Campus Departments:** Working with Public Safety, Administration, and other relevant departments to support operational needs and ensure consistent compliance with established procedures.

Other Departments

1. Departments seeking new cameras must submit a written request through their supervisor or Vice President to Public Safety, including location, funding source, and justification. Public Safety will advise on estimated installation and maintenance costs.
2. The Executive Director of Student Services will review the request and forward a recommendation to the President for final approval.

G. Training

All operators must receive regular training on legal compliance, privacy, and technical procedures.

H. Review and Audit

1. These procedures will be reviewed biennially (every two years), or as laws change, by Site Safety Committee and the Director of Public Safety. Any changes must be approved by the Administrative Council.
2. The College will make these procedures available to students, faculty, and staff.

IV. Effective Dates

This procedure first became effective: July 29, 2014

Revised: May 21, 2024

Revived: December 16, 2025

V. Signature and Title

This procedure is implemented by: Kristi Shaw

Title: Executive Director of Student Services