

5.27 Security Camera Policy

Part 1. Policy

Central Lakes College uses security cameras as one resource to enhance the safety and security of persons and property. Additionally, security cameras may provide beneficial information for the management and operations of Central Lakes College. All security camera installations must be approved in advance by designated Central Lakes College personnel, as described in this policy, except in the case of an emergency that makes such consultation impractical. The placement and use of security cameras must comply with applicable state and federal laws, as well as system and campus policies. Security cameras must not have audio monitoring or audio recording capabilities enabled. Video monitoring of public areas for security purposes must be limited to uses that do not violate the reasonable expectations of privacy, as defined by law.

Part 2. Scope

This policy applies to all personnel and departments of Central Lakes College in the use of its equipment for video surveillance, monitoring, and recording on Central Lakes College-owned, leased or controlled properties; this policy does not apply to the use of video applications for academic, research, or educational purposes of Central Lakes College, or to security cameras installed by authorized financial institutions to monitor ATM usage on campus.

Part 3. Management and Use of Security Cameras

The primary purpose of security cameras is to support campus security and safety by providing a safe environment for the Central Lakes College community, including students, employees, and visitors. Information obtained through video monitoring will be primarily used for security and law enforcement purposes. Information obtained through authorized surveillance may be used to support disciplinary proceedings involving Central Lakes College personnel or students, or by Central Lakes College for other appropriate purposes, such as litigation.

The need for and placement of cameras are determined by the Security Coordinator, as outlined in the Parameters of Use in 5.27.1 Camera Use Procedure, ensuring they do not impinge on academic freedom rights. The installation of cameras is the responsibility of the Campus Information Technology Staff. The monitoring of security cameras and equipment must be administered by the Security Coordinator, as designated by the president, in accordance with this policy. The Security Coordinator may authorize the use of video surveillance in a temporary location upon request of a college official if a specific safety or security risk exists; if the request concerns the investigation of individuals, the Security Coordinator shall consult with the Office of General Counsel and/or the human resources office of Labor Relations in the system office before approval. The Security Coordinator shall consult with system legal counsel if law enforcement requests installation of video surveillance for a criminal investigation. If concern arises about camera placement, concerned persons may submit a petition to the Security Coordinator requesting the removal or relocation of an existing camera. The Security Coordinator will review petitions regarding camera location(s) and determine whether the policy is being followed. The Security Coordinator will evaluate the appropriateness of an installation by weighing the concerns of the person(s) making the request and the safety and security of the entire community. The Security Coordinator will weigh whether the potential increment in community security outweighs any likely infringement of individual privacy.

Part 4. Principles

The following principles shall apply regarding the use of security cameras at Central Lakes College under this policy:

- All recording or monitoring of activities of individuals or groups by authorized Central Lakes College security cameras will be conducted in a manner consistent with applicable system and Central Lakes College policies. It will not be based on an individual's race, gender, ethnicity, sex, disability, or other personal characteristics that are protected by Board Policy 1.B.1.
- All recording or monitoring of video records will be conducted in a professional, ethical, and legal manner. Campus security and other personnel with authorized access to video recordings must receive a copy of this policy. They will receive training on the effective, legal, and ethical use of the monitoring equipment upon assuming their role and at least annually thereafter.
- All recording or monitoring for security and safety purposes will be conducted only in areas where the public does not have a reasonable expectation of privacy. (e.g., not living spaces).
- Central Lakes College will securely retain recorded images from security cameras in accordance with its records retention schedule. The alteration of video images is strictly prohibited.

Part 5. Limiting Use, Disclosure, and Retention of Recordings

The Security Coordinator is responsible for controlling access to security cameras, monitors, and recordings in accordance with applicable privacy laws. Security camera data maintained by Central Lakes College may be nonpublic or private data on individuals under the Minnesota Government Data Practices Act and the Family Educational Rights and Privacy Act (FERPA). (Video surveillance data may be nonpublic or private "security information" as defined by Minn. Stat. § 13.37 Subd. 1 (a) or private personnel or educational data pursuant to Minn. Stat. §§13.43, Subd. 4 and 13.32, Subd. 3, and FERPA, 20 USC 1232g, which may be accessed, used, and disclosed to third parties only as consistent with those laws.)

Nothing in this policy shall prevent reporting to law enforcement real-time observations of conduct that appears to constitute criminal activity.

Recorded images will be stored in a secure location, the Safety and Emergency Team Site, with access by authorized personnel only. A log must be created by the Security Coordinator and maintained by authorized Security Coordinators of all instances of access to or use of surveillance records. The log must include the date and identification of the person or persons to whom access was granted.

Security camera data shall be maintained with appropriate security in accordance with the Central Lakes College records retention schedule, and will then be destroyed securely, unless retained as part of a Central Lakes College proceeding, a criminal investigation, a court proceeding (criminal or civil), or other use as approved by the Security Coordinator or Security Coordinator(s).

The Security Coordinator is responsible for securely retaining surveillance data, including video recordings, as required for evidentiary purposes. Suppose a copy of a recording is required for evidentiary purposes. In that case, authorized campus personnel shall consult with the Minnesota State Office of General Counsel or the Attorney General's Office on protocols that may be required for authentication or other purposes and shall use a permanent storage device such as a CD, DVD, or USB drive and physically label the device with the date, time, and location of the recorded incident. No video footage segments or individual image copies, other than those required for system

backup or evidentiary purposes, may be made, shared, or distributed without specific authorization/approval as stated above.

Part 6. Violations

Any individual who has concerns about the possible violation of this policy may discuss the matter with the Security Coordinator. Any individual found to have violated this policy may be referred for discipline under the applicable personnel or student conduct process.

Individuals who are believed to have tampered with or destroyed security camera equipment or recordings, or individuals who have accessed security camera records without authorization, may be subject to discipline under the applicable personnel or student conduct process and criminal prosecution, as appropriate.

Date of policy creation: April 11, 2018

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Revision(s):

Date of implementation/Presidential Approval: 5/3/2018

Date of last review: 7/31/2025