



# Video Surveillance Policy

**Policy Title:** Video Surveillance Policy

**Issued By:** Department of Safety and Security Services

**Responsible Office:** Campus Services

**Responsible**

**Officer:** Vice President, Campus Services

**Effective:** August 1, 2013

**Last Revised:** July 2022

**Next Scheduled**

**Review:** July 2025

**Policy Statement:** Franklin University is committed to enhancing the quality of life of the campus community by integrating the best practices of private campus safety with state-of-the-art technology. A critical component of a comprehensive security plan is the ability to document activities on campus through video surveillance technology, commonly referred to as closed circuit television (CCTV).

**Purpose:** The purpose of this policy is to regulate the use of closed circuit television (CCTV) cameras used to monitor and record public areas for the purposes of safety and security.

**Scope:** This policy applies to all Department of Safety and Security personnel, Special Duty Security Officers, University faculty and staff.

**Definitions:** CCTV (closed-circuit television) a video capture system in which signals are not publicly distributed but are monitored locally, and data is saved in a centralized location (e.g. network server, remote hard drives, etc.). The designation "closed-circuit" indicates that access to video content is limited by design only to those authorized to view it. As used in this policy, the term CCTV applies only to video hardware and video data residing on Franklin University storage hardware.

**Policy Details:** The objective of CCTV surveillance operations in public areas is to help deter crime, identify and apprehend criminals, and to assist the Department of Safety and Security Services in protecting the Franklin University community at large. Any diversion of security technologies and personnel for other purposes (e.g. CCTV monitoring of student testing activities, or employee and/or student evaluations) would undermine the acceptability of these resources for critical safety goals and is therefore prohibited by this policy.

## **Prohibition of Harassment or Discriminatory Activities**

Video surveillance of public areas will be conducted in a manner consistent with all existing Franklin University policies, including the Harassment and Discrimination Policy, the Sexual Harassment Policy, and other relevant policies. This policy prohibits surveillance activities centered on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability etc.)

Video surveillance operations conducted in the public areas of the University, for security purposes, are limited to uses that do not violate the reasonable expectation of privacy as defined by law.

## **Monitoring/Reviewing Business Activities**

Under no circumstances will the Department of Safety and Security Services personnel use the CCTV system to monitor staff, faculty, or student work behavior unless there is a legitimate investigation pertaining to: conduct contrary to the law, applicable violations of the student code of conduct, or existing Franklin University policy. Any such monitoring or review must be accompanied by a written complaint, report, memo, email or other correspondence from the Director of the requesting University department detailing the nature, scope and level of action to be taken.

All requests and/or reviews must be directed through the Vice President, Campus Services and/or the Executive Director of Human Resources. Safety and Security Services may seek guidance from available resources including Human Resources and Student Affairs, as a measure to comply with existing University policies pertaining to employee rights in the workplace and any FERPA regulations.

## **Disseminating Video Data**

Information obtained through video surveillance operations will be used exclusively for campus security and law enforcement purposes. Information obtained through video surveillance operations will only be released when authorized by the Vice President, Campus Services and/or appropriate administrative personnel identified through the course of the investigation (e.g. legal resources).

Information obtained in violation of this policy may not be used in a disciplinary proceeding against a member of Franklin University faculty, staff or student body.

## **Professional Conduct and Supervision**

Video recordings produced for security purposes will be conducted in a professional, ethical and legal manner. Personnel involved in video surveillance operations shall be appropriately trained and continuously supervised in the responsible use of this technology. Violations of procedures for video operations referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of Franklin University and the Department of Safety and Security Services.

The Department of Safety and Security Services is authorized to oversee and coordinate the use of CCTV operations for safety and security purposes at Franklin. The Department of Safety and Security Services has primary responsibility for disseminating and implementing CCTV related policy and procedures.

## **Installation and Relocation of Cameras**

Safety and Security Services will review camera locations to ensure the view of fixed location cameras conforms to this policy. The proposed location of permanent CCTV cameras will be reviewed by the Vice President, Campus Services prior to installation. The VP or his/her designee will review complaints regarding camera locations and determine whether the CCTV operations policy is being followed. The VP should weigh whether the potential infringement in community/security relations outweighs any likely infringement of individual privacy.

## **Release of Video Data for Legal Proceedings/Investigations**

The Vice President, Campus Services will review all requests received by the Department of Safety and Security Services to release recordings obtained through CCTV surveillance operations. No releases of CCTV recordings will occur without authorization by the Vice President, Campus Services.

The Vice President, Campus Services may approve release of CCTV recordings as evidence to be used during legal proceedings. Any release of recordings will be recorded in a log with a written security report addressing the release. The log will include date of release, purpose of release, name and contact information of the recipient.

Safety and Security Services may audit the CCTV surveillance operations, including video media storage devices, at any time without prior notice.

## Video Data Storage

Recorded video media will be stored for a period of time, based on the requirements and capabilities of the CCTV hardware and software system. CCTV video data will be stored for a minimum of thirty (30) days, subject to system capabilities. Once the video media reaches thirty (30) storage days, the oldest video media will be erased from the CCTV storage system.

Video media may be saved and retained on other recording devices (CD, DVD, flash drive, etc.) as part of a criminal investigation or court proceedings (criminal or civil), or violation of the Franklin Code of Conduct, or other bona fide use as approved by the Vice President, Campus Services.

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## References:

*Model Institutional Policy Governing CCTV*. IACLEA Publication.

*Video Surveillance Policy, 82.3.2* (IACLEA), Otterbein University, 2013

Franklin University Employment Handbook - 2021

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## Associated Policies & Procedures:

Harassment and Discrimination Policy; Sexual Harassment Policy; Workplace Violence Policy

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## Contacts:

- Safety & Security Services, (614) 947- 6902
  - VP, Campus Services, (614) 947-6080
  - University Regulations
    - VP, Campus Services, (614) 947-6080
    - Senior VP Administration, (614) 947-6540
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## Review/Evaluation Timeline:

This policy is to be reviewed every three years, or as needed

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## Revision History:

April 22, 2013; April 29, 2019; July 2022

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## SharePoint:

<https://franklinu.sharepoint.com/:f:/r/sites/Community/Shared%20Documents/Documents%20and%20Resources/University%20Policies?csf=1&web=1&e=IVxkP!>

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