**Campus Safety Department** 

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| General Order (GO) No: **1.11** | Supersedes: N/A – New GO |
| Effective Date: 9/22/2023 | Relates/Refers to GO: **1.07 Conduct, 5.02 Incident Reports, 5.18 Requests for Security Infrastructure Enhancements, 1.09 Records Retention** |
| Subject: **Closed-Circuit Television (CCTV) Monitoring and Recording** | Distribution: **Department** |
| Revised: N/A | Is GO on the website: **Yes** |
| Revision notes: | Is GO in Report Exec: No |
| Revision distribution: | Is GO in the ASR: No |

**Purpose**

The purpose of this policy is to establish comprehensive guidelines for the use of Closed-Circuit Television (CCTV) on Nazareth University property. This policy is designed to enhance security while also respecting the reasonable expectation of privacy among members of the University community.

**Background**

Nazareth University is committed to creating and maintaining a safe and secure environment for its community members. CCTV systems are crucial tools in achieving this objective, serving to deter criminal activities, ensure the safety of individuals, protect University property and assets, and facilitate investigations. This policy is instituted to provide a structured framework for the ethical, legal, and responsible use of CCTV on the campus.

**Scope & Compliance**

This General Order applies to all personnel within the Nazareth University Campus Safety Department. All members of the Campus Safety Department receiving distribution must comply with the guidelines and instructions outlined in this GO. Failure to comply may result in disciplinary action, up to and including termination of employment.

**General Principles**

1.1. The primary purposes of CCTV at Nazareth University include:

* Safeguarding the well-being of individuals: This encompasses students, faculty, staff, and visitors, ensuring their physical safety and psychological comfort within the campus environment.
* Protecting University-owned and/or operated property and buildings: CCTV systems are crucial for safeguarding the physical assets and infrastructure of the University. This includes not only buildings but also building perimeters, entrances, and exits to deter unauthorized access and criminal activities.
* Investigating criminal activities and policy violations: CCTV serves as a valuable tool in post-incident investigations, allowing for the review of recorded footage to aid law enforcement, Campus Safety, and relevant authorities in identifying, apprehending, and addressing criminal activities or violations of University policies.

1.2. The existence of this policy does not imply real-time monitoring of CCTV cameras.

* While CCTV systems are in place to enhance security, the University does not undertake continuous real-time surveillance of camera feeds. Instead, cameras are intended for investigative purposes, when not actively required for incident review.

1.3. Inoperative, placebo, or "dummy" security cameras shall not be installed or utilized on campus, as they may create a false sense of security that someone is actively monitoring operational cameras.

* To maintain the integrity of the security system, only functional CCTV cameras with the capability to capture and store footage may be deployed on campus.

CCTV evidence

* All CCTV reviews, monitoring activities, and associated procedures will be conducted in a professional and ethical manner.
  + Professionalism: Those involved in CCTV monitoring and review will exhibit the highest level of professionalism, adhering to established protocols and guidelines, specifically **GO 1.07 Conduct**.
  + Ethical Conduct: Personnel responsible for CCTV operations will demonstrate unwavering ethical conduct, respecting the privacy and dignity of individuals captured on camera.
* The Director or their designated representative will carefully evaluate and respond to subpoenas, and requests made by external law enforcement agencies seeking access to view or take possession of recordings obtained through CCTV monitoring.
  + During this assessment, the Director or their designee will prioritize the primary objective of CCTV on campus, which is to ensure the safety and security of individuals, including students, faculty, staff, and visitors. This consideration will be balanced with the privacy expectations of individuals on campus and the broader need to protect the larger Rochester community.
* Campus Safety will in general not participate in requests to use the CCTV system for matters that do not involve criminal activities or policy violations.
* To further documented investigative purposes, and in-line with the principles described in this GO Campus Safety staff may ask individuals outside of the Campus Safety Department to participate in CCTV review.
* Campus Safety will not share any form of CCTV with members of the public or the Nazareth community who do not meet the criteria described in this GO.

2. Adding or modifying CCTV infrastructure

* Annually, based on data analysis and relevant trends, the Assistant Director will assess the existing locations of campus CCTV cameras. Cameras may be repositioned, added, or removed based on this systematic evaluation.
* Any department, program, campus organization, or affiliate of Nazareth University seeking to install, modify, or expand CCTV cameras on University property must complete the Safety Infrastructure Equipment Request form on the Campus Safety website.
  + Following completion of the form Campus Safety will closely review and respond to each request in keeping with **General Order 5.18 Requests for Security Infrastructure Enhancements**.
  + It is important to note that Campus Safety reserves the authority to deny the request or propose an installation that is more or less extensive than initially described in the original petition.

**Responsibilities**

Campus Safety is responsible for managing all security cameras on campus, ensuring compliance with all applicable laws, regulations, University policies, and ethical standards. They also actively monitor evolving laws and security industry practices to maintain the highest standards of CCTV monitoring.

**Timeline**

This GO is effective immediately upon approval.

**Reporting**

Relevant video evidence, typically in the form of still frame images will be attached to the appropriate Incident Report, and may be distributed to those individuals with legitimate purposes as described in **GO 5.02 Incident Reports.**

**Contacts**

The Director of Campus Safety is responsible for the application of this General Order.

**Recordkeeping**

In general Campus Safety maintains records of CCTV recordings for a period of weeks before they are deleted. Upon request, and at the discretion of the Assistant Director or designee Campus Safety may export video for recordkeeping over a more extended timeframe as further described in **GO 1.09 Records Retention**.

**Amendments and Revisions**

This GO may be amended or revised as needed to ensure its alignment with applicable laws, regulations, and best practices. Any proposed amendments or revisions should be communicated to the Assistant Director of Campus Safety for review and approval. This GO has been reviewed and approved by the undersigned. Any changes to this GO require the same level of review and approval before implementation.

**Approval Date**

Director of Campus Safety: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Fire and Life Safety Officer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Assistant Director of Campus Safety: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please acknowledge receipt and understanding of this GO by signing by September 30, 2023.

