

Administrative Procedures	
Procedure No.601.1 Policy No. 601	Name of Procedure Security Cameras – Approved Use & Design Standards

601.1 Purpose

Lower Columbia College, recognizing the importance of providing and maintaining quality facilities and infrastructure that enhances the delivery of education and support services to our community, will provide for and operate its facilities in a safe, secure, effective and efficient manner. This includes establishing and implementing standards that ensure consistency, operational efficiency, safety, security, maintainability, and maximum utilization of those working and learning environments. These standards represent best use of state resources and are aligned with Lower Columbia College’s mission and values.

601.2 Limitations and Requirements

In implementing this procedure priority will be placed in utilizing systems that advance safety of faculty, staff, students and visitors, security of property, crime deterrence, loss prevention, and general risk management. Security cameras can be such a system if appropriately administered consistent with this procedure.

601.2.1 The Vice President of Administration is responsible for administering this procedure in consultation with the Director of Human Resources & Legal Affairs, Director of Campus Safety & Security, and security personnel.

601.2.2 This procedure does not diminish or eliminate the standard of care owed by a consultant to LCC or relieve, in any manner whatsoever, a consultant from any professional responsibility, duty, or due diligence required toward the work.

601.3 Definitions

The following definitions are specific to the terms of this procedure and do not modify or revise similar terms as used in related procedures or collective bargaining agreements.

601.3.1 Vice President of Administration: the administrator responsible for the Campus Services Department & Safety & Security Department.

601.3.2 Facility: a college owned or controlled property, building or component of that property/building.

601.3.3 Security Camera: Closed-circuit television (CCTV) using video cameras to transmit a silent signal to a specific place and/or a limited set of monitors.

Differs from broadcast television in that the signal provides no audible recording and is not openly transmitted (though it may employ point to point (P2P), point to multipoint, or mesh wireless links). This definition covers video cameras used to advance security of safety of faculty, staff, students and visitors, security of property, crime deterrence, loss prevention, and general risk management. This does not include video technology used for purposes other than security.

601.3.4 **Design Standards:** directives and information intended to serve as a tool for design professionals, construction managers, planners, design committees and others participating in capital construction and renovation planning efforts.

601.3.5 **Exigent Circumstances:** situations that demand unusual or immediate action.

601.3.6 **Open and public area:** an area open to, used by and/or accessible to more than one person and for which there is no reasonable expectation of privacy under the law.

601.4 Process for Requesting Installation of a Security Camera

Requests for installation of a security camera system may be made by the ASLCC, LCC faculty and staff by using the "Security Camera Installation Request" form. Such requests will then be considered as follows:

601.4.1 Request for placement and installation of a security camera system shall be sent to the Vice President of Administration. Requests will be considered by the Vice President of Administration, in consultation with the Director of Human Resources & Legal Affairs, Director of Campus Safety & Security, appropriate facilities, and IT staff.

601.4.2 Approval will only be granted where the following pre-conditions are met:

0.4.21 Proposed equipment will record only silent video images. Equipment will not possess the capacity or otherwise be installed/used in a manner that records sound.

04.22. Surveillance area will meet the definition of an open, public location with no reasonable expectation of privacy at any time.

04.23 Placement of the proposed surveillance equipment must further LCC's need for a secure and safe environment, the efficient operation of its facilities or equipment monitoring for quality control.

601.4.3 Considerations/analysis shall include, but not be limited to:

0.4.31 Would installation create right to privacy concerns or potentially violate collective bargaining agreements? Concerns shall be forwarded to Human Resource Services for review/direction.

04.3.2 Does the request comply with established design standards? If not, why is there a variance and, if approved, is the variance serviceable by in-house maintenance personnel or must it be outsourced to service vendors?

04.3.3 Is the requested system compatible with existing infrastructure (i.e. mechanical, electrical, plumbing, telecommunications, structural, architectural, life safety, building automated controls, security, finish and furniture systems)?

601.4.4 Absent exigent circumstances, thirty (30) calendar days advance notification will be given to the classified union, faculty association, and ASLCC prior to installation or relocation of cameras. If possible, notification will be given at a Leadership Team Meeting. If this is not possible due to timing, absence or other unforeseen circumstances, notification will be given by the Vice President of Administration or Director of Human Resources & Legal Affairs in writing.

601.4.5 Following the above analysis, the Vice President of Administration will respond to the requesting party and inform of decision.

601.4.6 If the request is not resolved to the satisfaction of the requestor, it can be appealed to the President. The President's decision, respectively, will be implemented without further review.

601.5 Security Camera Design Standards

These design standards serve to clarify direction and streamline project execution. They represent the college's standardized decision and should be applied, when possible, without compromising the overall design. Each design standard includes direction on whether equivalent substitutes are acceptable.

601.5.1 LCC will install only Facilities authorized brand(s) of security cameras, DVRs and related system equipment. Wiring standards will be as determined by the Director of Information Services in consultation with the Director of Campus Services.

601.5.2 This standard does not address every conceivable condition or occupant decision point. Rather, it attempts to provide guidance based upon industry standard or where experience has indicated a standard is appropriate and prudent.

601.6 Legal Considerations and Waivers

601.6.1 RCW 9.73.030 addresses the ability of individuals and agencies of the State of Washington to conduct surveillance. The code provides that it's unlawful to intercept or record any private conversation by any device electronic or otherwise designed to record or transmit such conversation regardless of

how the device is powered without first obtaining the consent of all the parties engaged in the conversation.

06.1.1 LCC complies with this code by refusing to install any security camera that has audio recording capabilities.

601.6.2 Electronic Communications Privacy Act of 1986 prohibits the interception of any wire, oral or electronic communication and only permits the recording of communications where the parties have given prior consent.

06.6.2 LCC complies with this act by refusing to install any security camera that has audio recording capabilities.

601.6.3 U.S. Constitution, Amendment IV and Washington State Constitution both provide in pertinent part that no person shall be disturbed in his private affairs, or his home invaded, without authority of the law. The decision to install video surveillance cameras must take into consideration this “right to privacy.”

06.6.4 LCC complies with these constitutional amendments/sections by refusing to install a video camera system in any area where a person has a reasonable expectation of privacy at the time of taping. This is further advanced by installing systems so that only open and public areas are under surveillance. In such areas there is no reasonable expectation of privacy. The goal is to balance the individual’s right to privacy with LCC’s need to safely, securely and efficiently operate our facilities.

601.6.4 Recorded images and data may be viewed by the Designated Student Conduct Officer and/or the Director of Human Resources & Legal Affairs or their designee as part of an official investigation or possible violation of law. All investigations will be conducted in accordance to applicable collective bargaining agreements, student code of conduct and applicable laws and regulations including but not limited to any notice obligations.

601.7 Storage and Retention of Images and Data

601.7.1 Recorded images will be stored and retained consistent with the capabilities of the system and LCC’s technology capacities. The images will be retained for 30 calendar days.

601.7.2 Images will not be monitored on an ongoing basis but rather will be accessed where such images may provide information critical to resolving an issue or concern regarding the safety of faculty, staff, students and visitors, security of state property, crime activity, loss confirmation, and general risk management.

- 601.7.3 Any image that is determined to have investigative value and is downloaded for retention beyond 30 calendar days will be sealed, logged and stored in such a manner that it protects its custody and evidential integrity. Security and/or HR staff will take possession and maintain such evidence to ensure chain-of-custody and confidentiality.
- 601.7.4 LCC security camera administrators, authorized users and operators shall sign and abide by the Security Camera System Administrator, Authorized User and Operator Code of Conduct. Biennial training on the Administrative Procedures shall occur and be verified by signature on the Operator Code of Conduct form.
- 601.7.5 If there is a breach of the Security Camera System Approved Use & Design Standards, any affected faculty, staff, student or visitor will be notified by the Security Camera Administrator or designee.
- 601.7.6 The installed security camera system will contain an automated access log.

601.8.1 Signage

Prior to activation, signs indicating the presence of video surveillance will be posted in the areas surveilled.

601.9.1 Exemptions and Exceptions

Exceptions to this procedure may exist where video surveillance is part of an ongoing employment or criminal investigation. Exceptions will be granted by the President.

601.9.10 Non-Discrimination & Anti-Harassment

This procedure will be implemented in accordance with our policy against harassment and discrimination. The college does not discriminate on the basis of race, color, national origin, age, perceived or actual physical or mental disability, pregnancy, genetic information, sex, sexual orientation, gender identity, marital status, creed, religion, honorably discharged veteran or military status, or use of a trained guide dog or service animal, as required by Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, Section 504 and 508 of the Rehabilitation Act of 1973, the Americans with Disabilities Act and ADA Amendment Act, the Age Discrimination Act of 1975, the Violence Against Women Reauthorization Act and Washington State's Law Against Discrimination, Chapter 49.60 RCW and their implementing regulations.