Babson College Security Camera and Duress Device Policy

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Definitions

**Security Camera System:** Any video installation with capacity to view or record College owned or controlled spaces to assess safety and security.

**Recording Systems:** Recording systems are computerized information storage systems (e.g., Digital Video Recording Devices or “DVRs”) that are physically located and/or maintained by ITSD.

**Duress Device:** A duress device is a physical device or button that may be installed and concealed in a designated area or space that is connected to a monitoring station through Public Safety Communications Center. The device can be used to request emergency assistance from Public Safety.

Purpose and Scope

Babson College recognizes the importance of integrating technology with best practices for on-campus safety and security. This policy applies to all personnel and departments of Babson College relative to the use of security cameras, their monitoring and related recording systems. The purpose of security cameras is to observe and record certain public areas as well as entrances/exits of buildings with the purpose of enhancing safety and security on campus. The Security Camera System will be utilized in a manner consistent with applicable law and reasonable expectations of privacy. Areas subject to the use of security cameras are not monitored at all times, and the College makes no assurances regarding the regularity or scope of monitoring.

Information obtained from the Security Camera System shall be used for safety and security purposes and for investigations pertaining to potential violations of law and/or College policies. The specific functions of the Security Camera System includes deterrence, detection, property protection, personal safety, situational awareness and investigative assistance. The policy details procedures for approvals, installation, accessibility, monitoring, training, review and storage, dissemination, destruction of images and clearly addresses responsibilities surrounding reasonable expectations of privacy. All reasonable measures will be taken to protect individual privacy consistent with the terms of this policy. Information from the Security Camera System will be maintained securely through established restricted access, appropriate storage, transmission, and deletion.
This policy does not apply to cameras used by the College for other purposes, including: recording of public performances or events, interviews, public relations events, academics, athletics, research, and observations of Automated Teller Machines, or to recordings that may be made by outside law enforcement authorities pursuant to a court order.

The College recognizes the importance of risk assessment across campus and has identified areas/departments on campus that may benefit from a duress device to assist in sending an immediate emergency response request to their location without picking up a phone or calling for help. The device will immediately notify the Public Safety communications center that assistance is needed at a pre-determined location.

Responsibility

All Security Cameras and Security Camera Systems and Duress Devices and supporting personnel shall comply with this policy.

The Babson College Public Safety Department has the responsibility and authority to coordinate with the Information Technology Services Department (ITSD), as well as other College officials identified herein, in order to effectively select, coordinate, operate, manage, and monitor the College’s Security Camera Systems and Duress Devices pursuant to this policy. Public Safety and ITSD will conduct regular evaluation of the Security Camera and Duress Device System.

Public Safety and ITSD will review all requests, proposals, and recommendations for Security Camera installations and Duress Devices, the proposed locations, and related infrastructure needs. The Executive Director of Public Safety or his/her designee has the sole authority to approve, reject or modify any such request, proposal, or recommendation.

Public Safety shall:

- Evaluate best practices in the security industry regarding the Security Camera System and Duress Devices consistent with College policies, resources, and applicable laws.

- Be responsible for monitoring the functionality of the Security Camera System on a regular basis and making appropriate notifications for service or maintenance as needed.
1. Security Camera service or maintenance: Public Safety will contact ITSD to assess the issue. If further assistance is needed, ITSD will confer with Public Safety and contact an outside vendor as appropriate.

2. Duress Device service or maintenance: Public Safety will contact ITSD to assess the issue. If further assistance is needed, ITSD will confer with Public Safety contact an outside vendor as appropriate.

- Be responsible for maintaining a master inventory of all Security Cameras and Duress Devices throughout campus.

- Be responsible for any complaints or concerns regarding the potential misuse of the Security Camera System and Duress Devices and determine if the policy is being followed. If a violation has occurred, the Executive Director of Public Safety or his/her designee will consult with appropriate college officials regarding an appropriate outcome. Misuse of the Security Camera System or any images captured thereby is a serious violation of this policy and may result in action up to and including termination of employment.

- Be responsible for testing and reasonably monitoring the functionality of Duress Devices while documenting and immediately following up on any maintenance issues.

Placement and Installation

All Security Cameras shall be located in areas consistent with reasonable expectations of privacy and applicable law.

- No audio shall be recorded with any Security Camera System.
- Security Camera positions and views of residential housing shall be limited.
- Security Camera positions should be visible unless the Executive Director of Public Safety or his/her designee provides prior approval.
- The installation of non-operational Security Cameras shall be prohibited.

Any requests for Security Cameras or Duress Devices, including the justification for the request, shall be submitted to the Executive Director of Public Safety. The Executive Director of Public Safety or his/her designee will consult appropriate personnel regarding the proposed request and provide a response. The Executive Director of Public Safety or his/her designee has the sole authority to approve, reject or modify any such request. It will be the responsibility of the business unit/space manager to promptly advise Public Safety, ITSD if there is a change to the office space or equipment where a re-location of alarm/duress may need to be made.

When considering whether to permit the installation of a Security Camera in a particular location, the Executive Director of Public Safety or his/her designee will consider factors including the rationale for the camera to be installed, its location and scope of view, any applicable signage, and whether there is a reasonable expectation of privacy in the proposed location.
All requests for the installation of a Security Camera will be evaluated on a case-by-case basis. **Accessibility, Monitoring and Training**

Images recorded by the Security Camera System must be handled with an appropriate level of security to protect against unauthorized access, alteration or dissemination consistent with College policy and applicable law. All DVR and camera software monitoring equipment that is part of the Security Camera System will be stored in a secured location with restricted access to authorized personnel only. No attempt shall be made to alter any part of any Security Camera recording. To the extent feasible, Security Cameras centers and monitors will be configured to prevent Security Cameras from being tampered with or duplicating recorded information.

Public Safety personnel will be advised and trained on the placement and response procedures for Duress Devices. Employees in the designated area/department will also be provided with training and expectations regarding response.

**College Security Cameras are not monitored continuously and are not guaranteed to be monitored in real-time.** The College makes no assurances regarding the regularity or scope of monitoring.

All monitoring or recording by the Security Camera System will be conducted in a manner consistent with College policies and applicable laws. All monitoring and recording will be conducted in a professional, ethical and legal manner. Individuals or groups shall not be targeted. Use of the Security Camera System based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the College’s Non-Discrimination Policy or applicable law is strictly prohibited. Security Camera control operators will monitor activity based on suspicious behavior and not individual characteristics.

All personnel with access to the Security Camera System will have proper training and supervision with responsible use provided by the Public Safety Department. All personnel with access to the Security Camera System shall receive appropriate documented technical, legal and ethics training. All personnel will be provided with a copy of the policy and a signed acknowledgement of receipt.

**Review and Storage**

Personnel are prohibited from using or disseminating information or images acquired from the Security Camera System, except for official purposes. All information obtained and/or observations made via the use of the Security Camera System are considered confidential and may only be used for official College or law enforcement purposes upon the approval of the Executive Director of Public Safety or his/her designee.

Other than supervisors, the only Public Safety Department staff authorized to play back recorded video are on-duty staff assigned to the shift when searching for evidence of a recently reported incident in an attempt to identify possible perpetrators in order to provide responding and investigating officers with a description of suspects or important information in the moment or during investigation. The Security Camera System is configured so that all staff members who would potentially be working in the communications center (dispatchers, Community Service Officers, Police Officers) may access recordings for up to 30 days.

No person outside the Public Safety Department shall be permitted to review recorded video without the prior authorization of the Executive Director of Public Safety or his/her designee.
there are exigent circumstances pertaining to health and safety and the Executive Director of Public Safety and his/her designee are unavailable, a supervisor may review recorded video provided the Executive Director of Public Safety or his/her designee are notified as soon as practicable. All such reviews shall be documented in writing.

No recorded video is to be downloaded to a portable storage device except by a supervisor or investigating officer in the course of an official investigation in order to preserve the recorded video as evidence. In such cases, the Public Safety Department’s standard procedures for handling evidence shall apply.

All evidence and property management policies and procedures outlined in Chapter 28 of the Public Safety Policies and Procedures will be followed regarding the handling and storage of evidence that will apply.

**Deletion and retention of security camera recordings**

All Security Camera System recordings shall be stored in a secure College location for a period not exceeding 30 days and will then promptly be erased or written over, unless retained as part of a criminal investigation, an investigation relating to a violation of College policy, a civil or criminal court proceeding, pending litigation, or any other approved use as designated by the Executive Director of Public Safety or his/her designee.

**Release of Security Camera Recordings**

Requests for the release of any Security Camera System recordings should be directed to the Executive Director of Public Safety or his/her designee. Subpoenas, warrants, court orders and other Requests or demands for the release of any Security Camera System recording related to a criminal investigation (including subpoenas, warrants, and court orders) should be directed to the Executive Director of Public Safety or his/her designee and/or to the General Counsel. Requests or demands for the release of any Security Camera System recording for litigation matters unrelated to a criminal investigation should be directed to the General Counsel.

**Review Cycle**

This policy will be reviewed regularly and as needed by representatives from the following offices and departments: Public Safety, General Counsel, Human Resources, Student Affairs, Facilities and ITSD.