

Operating Protocol:

Acceptable Use of Security and Safety Cameras for the Protection of Students, Faculty, Staff, Visitors, and District Assets

June 2025

Summary

The Grossmont-Cuyamaca Community College District (District) is committed to ensuring the protection of individual privacy rights in accordance with the District's Vision, Mission and Values, and a deep commitment to Diversity, Equity, Inclusion and Accessibility. This commitment to individual privacy rights aligns with all District policies and procedures along with local, state and federal laws. The intent of this protocol is to provide guidance on the installation of safety and security cameras and equipment and the handling, viewing retention, dissemination and destruction of video records.

Introduction

The District is committed to enhancing the quality of education and well-being of the campus community by integrating the best practices of safety and security with technology contained in District Board Policy (BP) 3500 Campus Safety, which includes the District's Campus Security Philosophy, for the safety and well-being of the District community. A critical component of a comprehensive security plan is utilizing Security and Safety Cameras. The purpose of these cameras is to promote and ensure the safety and security of students, staff, and District property by deterring crime and enhancing the District's emergency preparedness while protecting the privacy of our students and employees as appropriate.

Security and safety cameras will be used in a professional manner at all times in accordance with existing District Board Policies (BP), including, BP 3410 Nondiscrimination, BP 3430 Prohibition of Harassment, and BP 3435 Discrimination and Harassment Complaints and Investigations, as well as applicable laws, including the Family Educational Rights & Privacy Act (FERPA), Educational Employment Relations Act (EERA), as well as local, state and federal laws and regulations. Images and related data collected by cameras are the property of the District, and will be held in the strictest of confidence. Video recordings will be retained for 30 days using the time-based auto deletion function through the camera system. After 30 days, the video recording will be destroyed by either the Associate Vice Chancellor of District Facilities Planning, Public Safety and Risk Management (referred herein as "Associate Vice Chancellor"), or the Sheriff's Deputies. Destruction shall be formally documented and maintained in the Vice Chancellor of Business Services Office in accordance with BP 3310 Records Retention and Destruction Policy.

This Operating Protocol **does not apply to**: webcams or other cameras for general use by District personnel; video equipment used for academic purposes; videotaping of athletic events for post-game review; videotaping of concerts, plays, and lectures; videotaped interviews of persons used for academic / instructional purposes; cameras installed in automated teller machines (ATMs); and/or the use of HyFlex cameras in the classroom for instructional purposes.

As discussed herein, security and safety cameras will only be installed where the District determines, based on operational needs and reported incidents, it is necessary to enhance the security and safety of

people and property on District premises. They will not be installed in locations where individuals have a reasonable expectation of privacy. Security and safety cameras will be visible and appropriate signage will be placed in clearly visible areas on District property to ensure proper notification of their presence.

Security and Safety Cameras will record images and video only, and will confidentially store the recording on a remote device located in a secured location with controlled access. No cameras will utilize audio recording. The footage will only be viewed when necessary, as determined by the Associate Vice Chancellor to: respond to an emergency or security event; investigate reasonable suspicions of crimes to persons or property as determined by law enforcement; provide information to law enforcement to respond to emergency situations; when otherwise required by law; or in order to respond to a claim against the District, including a claim under the Government Claims Act (Cal. Govt. Code Section 810, *et seq.*).

Definitions

Following is the definition of key terms, as used within this operating protocol:

1. **Security and Safety Camera:** a camera used for monitoring and recording public areas. A critical component of a comprehensive security and safety plan. The recording of public areas is intended to deter crime and assist in protecting the security and safety of students, faculty, staff and visitors and protect the property of the campus community.
2. **Security Camera Monitoring:** the physical viewing of security and safety camera video images in accordance with the protocols established herein.
3. **Security and Safety Camera Recording:** a digital recording of the video feed from a security and safety camera.
4. **Security and Safety Systems:** any electronic service, software, or hardware directly supporting a deployed security camera.

General Operating Principles

1. Security and safety camera systems will be used in a manner consistent with all existing District policies.
2. The Associate Vice Chancellor will be responsible for ensuring the confidentiality of recordings, and approval of access to the recordings. The Associate Vice Chancellor will ensure that the appropriate signage and notifications of the use of security and safety cameras is clearly posted to inform students, faculty, staff and visitors they may be recorded while on District property.
3. The Associate Vice Chancellor will ensure the security and safety system and equipment is maintained in good working order and that all storage devices (such as DIVARs, hard drives, or servers) that are not in active use are stored securely in a locked cabinet in a controlled-access area.
4. Any employee who knowingly or deliberately violates this policy will be subject to discipline in accordance with all bargaining agreements and employment contracts up to and including termination.

5. The Associate Vice Chancellor will ensure the security and safety equipment password and/or access code is changed whenever the employment of an authorized user of the Security and Safety System is terminated, or is no longer in a position that requires them to access video recordings.
6. Anyone may anonymously inform the Associate Vice Chancellor and/or the Vice Chancellor of Human Resources of any employee who does not comply with this Operating Protocol including a suspected privacy breach. All reports will be protected under BP 7700 Whistleblower Protection Policy.
7. The Associate Vice Chancellor will ensure security and safety cameras and any related equipment are installed in accordance with these procedures and only in areas where they are necessary for security and safety reasons, where suitable conditions exist (exterior of structures, interior of structures, low light areas, and others areas of concern), and where it does not unreasonably invade the privacy rights of students, staff, or visitors.
8. If security and safety cameras or the security and safety system is adjustable by operators, this function will be restricted to the Associate Vice Chancellor or the law enforcement so that operators cannot adjust or manipulate the cameras to view spaces that are not intended to be covered by the Security and Safety System.
9. Under no circumstances will security and safety equipment be directed at any locations where persons have a reasonable expectation of privacy.
10. The Associate Vice Chancellor will ensure that no attempt will be made to alter any part of a security and safety camera recording. The Bosch system uses embedded Watermarks to protect against recordings being altered.
11. The Associate Vice Chancellor will ensure that old or inoperable security and safety system storage devices are wiped clean and rendered unreadable and unserviceable before disposal. They will maintain a written record describing the date, method and location of the disposal in compliance with BP 3310 Records Retention and Destruction Management Policy.
12. When an incident is reported, a review of recorded information by a law enforcement official will occur with approval of the Associate Vice Chancellor. Security and safety system evidence will be stored securely until law enforcement responds. When a recording is requested as evidence, the name of the investigating officer and date and time of possession will be recorded and retained in a log book, which will be retained in compliance with BP 3310 Records Retention and Destruction Management Policy.
13. Any use of the security and safety camera recordings, other than which is detailed in this Operating Protocol, is strictly prohibited and is subject to disciplinary action in accordance with all bargaining agreements and employment contracts, up to and including termination.

14. Use of recordings from safety and security cameras will comply with the Memorandums of Understanding (MOUs) executed with the Bargaining Units at Grossmont-Cuyamaca Community College District on file in Human Resources

Responsibility for this Operating Protocol

The Associate Vice Chancellor is responsible for the security and safety cameras and systems, and implementation of this Operating Protocol. The Associate Vice Chancellor, in conjunction with contracted law enforcement agencies, has the responsibility to select, coordinate, operate, manage, and monitor all campus security and safety camera systems. Installation of security and safety cameras on District property without prior approval of the Vice Chancellor Business Services is strictly prohibited. In the event that an unauthorized camera is found, it will be removed with notice to the College President.

All existing security and safety cameras and systems must comply with this policy. Unapproved or nonconforming devices will be removed. The Associate Vice Chancellor working with the Vice Chancellors of Business Services and Human Resources, will be responsible for the creation, maintenance, and review of the District's strategy for the procurement, deployment, and use of security and safety cameras, including:

1. Establishment of the District standards for security and safety system devices and services and for authorizing the placement of all security cameras.
2. Requesting the purchase of any new or replacement security components or camera systems.
3. Reviewing existing security and safety systems and installations and identifying required changes to bring these into compliance with the District standards.
4. Updating the policy and procedures for the use of security and safety cameras and systems.
5. Ensuring all requests to add cameras to new locations is reviewed by Human Resources, who will be responsible for ensuring that the District is acting in accordance with the Memorandums of Understanding (MOU) with collective bargaining groups and acting in accordance with laws governing employee rights, including but not limited to the Educational Employment Relations Act ("EERA") of 1976.

The Associate Vice Chancellor will be responsible for addressing issues and concerns about the use of security and safety cameras and systems. If the Associate Vice Chancellor is unable to satisfactorily resolve an issue or concern, then the Vice Chancellor of Business Services will review the details of the concern, and make a final decision.

Copies of security and safety camera recordings and/or security and safety system information will be released internally or to law enforcement personnel only as authorized by the Vice Chancellor Business Services and in accordance with state and federal law, including the Family Educational Rights and Privacy Act ("FERPA"). Recordings will not be released to any other party except pursuant to a valid subpoena or court order, and only after being reviewed by the District's legal counsel prior to the release of any records.

Security and Safety Camera Placement

Security and safety camera placement locations and operation typically will be limited to visual access of areas where there is no reasonable expectation of privacy. Use of the security and safety system for the purpose of monitoring work areas, staff areas, or sensitive areas such as shared offices, will not be permitted unless approved by the Vice Chancellor of Human Resources in alignment with the spirit and intent of this Protocol, which includes the prevention and deterrence of dangerous or illegal activity and the enhancement of security and safety.

Monitoring private areas including bathrooms, shower areas, locker/changing rooms, or other areas where people may change clothes, and private offices, is prohibited.

The locations where cameras are installed may be restricted access sites such as a departmental computer lab; however, these locations are not places where a person has a reasonable expectation of privacy. Cameras will be located so that personal privacy is optimized

The view of a camera must not violate the standard of a reasonable expectation of privacy.

Storage and Retention of Recordings

Logs will be kept of all instances of access to, use, or release of any stored copies of recordings to provide for a proper audit trail.

No attempt shall be made to alter any part of any recording other than selecting specific incidents or periods of time to be retained.

All recorded information shall be automatically destroyed after thirty (30) days, except information specifically awaiting review by law enforcement agencies, information retained as evidence, information that has been duplicated for use under civil or criminal subpoena or court order, or as required by law or this Operating Protocol.

Requests for Installation of Additional Cameras

Individual departments, programs, or campus organizations requesting security and safety cameras shall submit a written request to their appropriate Director/Dean describing the proposed location of device(s) justifying the need for the proposed installation. If the Director/Dean approves the request it will follow the campus process for the approval by the campus President. If the campus President approves the request, it will be forwarded to the Associate Vice Chancellor and the Vice Chancellor of Human Resources to verify alignment with the MOUs with labor groups before final approval.

July 8, 2024	GCCCD District Executive Council First Reading
September 9, 2024	GCCCD District Executive Council Second Reading
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