

# WESTERN NEBRASKA COMMUNITY COLLEGE

## Administrative Procedure

<b>TITLE:</b>	Video Surveillance for Safety and Security Procedure
<b>CATEGORY:</b>	Safety and Security
<b>DIVISION:</b>	General Institutional
<b>REFERENCE:</b>	Board Policy BP-703 (Video Surveillance for Safety and Security) Nebraska Revised Statute §28-311.08
<b>NUMBER:</b>	AP-703
<b>DATE OF REVIEW:</b>	June 15, 2022
<b>APPROVAL:</b>	John Marrin, Interim President

---

### Procedure

Video cameras and similar devices are authorized to be used in Western Nebraska Community College (WNCC) facilities, vehicles, and other places within the control of the College. The Vice President of Administrative Services or their designee, consistent with the purpose set forth in this procedure, will determine the location in which the devices will be placed and the times the devices will be in use.

Examples of appropriate placement of surveillance equipment shall include entrance to buildings, public areas, gathering spaces, parking lots and driveways, main hallways, stairs or elevator lobbies, elevators, classroom and laboratory spaces, and location of high value assets, and other areas as appropriate.

Devices shall not be placed or operational in locations in which individuals have a high expectation of privacy, including, but not limited to, places of solitude or seclusion as defined in Nebraska Revised Statute §28-311.08, including restrooms, lactation rooms, locker rooms, shower rooms, and residence hall rooms.

### Notice

Notice that a video surveillance camera is being utilized shall be given through appropriate mechanisms, such as by posting signs at building entrances or other locations and by including a notice in the student and employee handbooks and on the WNCC website.

### Video Recordings

Video monitoring for security purposes will be conducted in a professional, legally authorized manner and will not violate anyone's reasonable expectation of privacy. Monitors used to view video recordings are to be located at a position such that only authorized personnel can see the images on the monitors. Only authorized personnel shall be allowed to view a recorded video. Authorized personnel for these purposes shall include the Vice President of Administrative Services or their designee, WNCC Information Technology personnel responsible for the technical operations of the system (for technical purposes only), and WNCC security personnel. In some limited circumstances, the Vice President of Administrative Services or their designee may authorize a supervised viewing of

surveillance cameras and recorded video by other designated staff members. College security officers may be allowed to view monitors and recorded video when such viewing is consistent with College security, discipline policies and procedures, student due process, and state statute. Students shall not be permitted to view a recorded video except when the individual student is the focus of the video or when the student is directly involved in an incident and can provide information related specifically to the incident.

### **Use of Video Recordings**

Video recordings may be used as a basis for student or employee disciplinary action, evaluation of safety issues or violations, the investigation of misuse or theft of property, and other uses consistent with these purposes, including making reports to law enforcement.

### **Family Educational Rights and Privacy Act**

College-based video surveillance recordings involving students may be considered educational records within the scope of the Family Educational Rights and Privacy Act (FERPA) and shall remain confidential, if subject to FERPA and other applicable laws. A video recording may be considered an educational record when a specific student is the focus of the video recording. The video recording may not be viewed, nor will a copy be given to others, without appropriate written consent by the student, unless an exception exists.

### **Subpoenas**

A subpoena is a formal court order requiring the attendance of a person in court to give evidence or to produce documents or do both. Upon receipt of a subpoena for any video or surveillance recording, the person receiving the subpoena is directed to report receipt of the subpoena to the Vice President of Administrative Services who will seek appropriate legal counsel concerning a response to the subpoena.

### **Maintenance of Video Recordings**

Video recordings shall be retained for a minimum of 30 days or until a determination is made that no incident has occurred. If an incident has been recorded, the recording will be transferred and retained concurrently within the incident file. Video recordings that contain personal information shall be securely stored to protect the confidential rights of all individuals captured in the video. When the video recordings are no longer needed or required to be maintained the recordings shall be deleted or erased.

### **Maintaining the Integrity of the Video Surveillance System**

The Vice President of Administrative Services or designee shall be responsible for checking the video surveillance system on a weekly basis to ensure it is operating properly.

### **Revising this Procedure**

This Administrative Procedure supersedes any prior WNCC policy, procedure, guideline, or handbook on this subject matter.

WNCC reserves the right to revise this procedure, as necessary, and for the changes to become effective immediately.

**Original Adoption Date:** June 15, 2022  
**Revision Date:**  
**Sponsoring Division:** Administrative Services