1.0 BACKGROUND AND PURPOSE

Mines is committed to fostering a safe and secure campus environment by integrating safety and security technology consistent with industry best practices. The use of security cameras on University property is intended to deter crime, aid in the apprehension of suspects, and enhance the overall safety and security of property and individuals within the campus community.

The purpose of this policy is to regulate the use of security cameras on campus in order to provide a safe and secure environment for students, staff and visitors, as well as protecting property from theft and/or vandalism. This policy formalizes procedures for installing surveillance equipment on campus, and the handling, viewing, retention, dissemination, and destruction of surveillance records, consistent with the protection of individual privacy rights.

This policy applies to all University personnel and property involved in the Passive Surveillance by Security Cameras. The use of cameras and/or recordings for any purpose not detailed within this policy are subject to the Appropriate Use of Network Systems.

2.0 POLICY STATEMENTS

Security Cameras will not be consistently monitored in real time, and any data obtained through monitoring will be used exclusively for security, law enforcement, and official Mines business purposes, or as otherwise required or permitted by applicable law. Security Camera monitoring should only occur pursuant to this policy.

Security Cameras should not be procured, installed or used by departments without approval from the Chief Information Officer and the Director of Public Safety or their designees.

Security Cameras will only be positioned to record data in areas considered public, where individuals would have no reasonable expectation of privacy.
All recording of activities will be conducted in a manner consistent with existing Mines’ policies, state and federal laws.

Security Camera recordings will be stored on servers accorded appropriate computer security with access by authorized personnel only.

Records/systems related to the use of Security Cameras and recordings from Security Cameras must be sufficient to validate compliance with this policy.

Security Camera recordings/data are to be stored in a secure location for a period of 30 days. This retention period may be extended at the request of the Office of General Counsel, the Director of Public Safety, or as required by law. Individual departments will not store security camera recordings. See Mines' Record Retention Policy.

Only Public Safety and authorized individuals may access Security Camera data or recordings. Such data may be accessed for:

- maintenance of a security camera;
- investigation of suspected illegal or criminal activity;
- investigation of suspected activities in violation of University policy;
- compliance with legal obligations to preserve, release, or otherwise use live feed or recorded images;
- general safety and security monitoring; or
- business or operational needs consistent with the intent of this policy.

3.0 RESPONSIBILITIES

All University personnel must follow the procedures in Exhibit I when requesting a Security Camera or access to recordings.

Public Safety is the Data Steward of all records related to the use of Security Cameras on campus, as well as all recordings/data generated by Security Cameras. Information & Technology Solutions (ITS) is the Data Custodian for security camera recordings.

Public Safety will approve any additions or modifications with respect to Security Camera locations, installation, placement or use. Public Safety will make decisions regarding surveillance coverage and disclosure of any footage.

ITS will oversee identification and implementation of standards related to technical specifications, installation, recording, and preservation of footage.

Infrastructure & Operations will assist/oversee any new security camera installation. Security Camera work orders should not be installed without approval from the Director of Public Safety.
4.0 COMPLIANCE

Violation of this policy will result in the removal of an unapproved Security Camera.

Abuse of policies, inappropriate camera control operations, or information obtained in violation of this policy may result in disciplinary action.

5.0 EXCLUSIONS/DISCLAIMER

No person should assume that the presence of a Security Camera on campus will guarantee safety for persons or property. Rather, Security Cameras are one of Mines’ tools in continuing efforts to promote campus security and safety.

This policy does not apply to cameras used for:
- academic purposes;
- research, communications, class projects or Communication’s department organizations (as governed by other policies involving human subjects);
- construction monitoring and related activities;
- videotaping events or live streaming for general use by Mines;
- video equipment for the recording of public performance or events, interviews, or other use for broadcast or educational purposes. (Examples of such excluded activities would include videotaping of athletic events for post-game review, videotaping of concerts, plays, and lectures, or videotaped interviews of persons.);
- automated teller machines (ATMs);
- operational parking systems;
- law enforcement recording devices (e.g., dash cams and body worn cameras); or
- personal mobile recording devices.

6.0 DEFINITIONS

Data Custodian: Individual or department responsible for housing, keeping the data, and managing the resources which enable its collection, management and controlled access. (e.g., institutional data archives vault, institutional data paper or other media collections, data computer system(s), server(s), and supporting infrastructure that stores processes institutional data). See Mines’ Data Classifications and Roles Definitions.

Data Steward: School official with direct operational responsibility for a broad segment of institutional data. See Mines’ Data Classifications and Roles Definitions.

Passive Surveillance: use of a digital video camera, video tape camera, closed circuit television camera, film camera, photo radar recorder, or other
image recording device positioned to capture moving or still pictures or images of human activity on a routine basis or for security or other purposes, including monitoring or recording traffic, weather conditions, office activities, transit facilities, parking garages, sports venues, schools, day care centers, recreational facilities, or utility facilities. [C.R.S. 24-72-113].

**Security Camera:** A video or digital image recording device that can be positioned to capture moving or still pictures or images on a routine basis (also known as electronic surveillance or CCTV).

### 7.0 RESOURCES or ATTACHMENTS

- Appropriate Use of Network Systems
- Retention Policy
- Data Code of Conduct
- Data Classifications and Roles Definitions
- C.R.S. 24-72-113

**KEY WORDS**

Camera, privacy, recording, security camera, surveillance, video

### 8.0 HISTORY AND REVIEW CYCLE

This policy will be reviewed at least every two years or as needed by the Responsible Administrative Unit.

Issued: April, 2009.

Updated/Amended:
September, 2016 (updated)
May 19, 2020 (format revised, updated for access and dissemination)
EXHIBIT I

1.0 Procedures to Request Security Camera Installation and Placement

1.1 Departments or offices desiring the installation of a new Security Camera will submit requests for installation to Public Safety and ITS. All requests must include the basis for the request, and proposed sites for placement. All requests will be processed through the Request Form For Security Camera Systems.

1.2 Public Safety will be responsible for coordinating the placement of all temporary and/or permanent Security Cameras on the Mines campus, consistent with this policy. In determining the appropriate placement of Security Cameras, Public Safety will consider public safety needs, building codes, privacy, and any other Mines’ requirements. Public Safety will consult with the Office of General Counsel and/or the Privacy Compliance Director, as needed. Once placement of a new Security Camera is approved by the Director of Public Safety, the requesting department or office will coordinate installation with ITS and Infrastructure & Operations.

1.3 Equipment and technology will be purchased and maintained by ITS.

1.4 Equipment and configuration will be standardized. Mines’ Chief Information Officer, or designee, will periodically review the information technology security on Security Camera systems and provide the Director of Public Safety with a summary of its findings and recommendations.

1.5 Placement of Security Cameras may be indicated by signage as practical and appropriate, subject to the discretion and approval of the Director of Public Safety.

1.6 Security Camera locations are maintained by ITS, and will be shared on a routine basis with the Director of Public Safety.

2.0 Security Camera Procedures for Access and Dissemination

2.1 Internal requests for access to the video recordings will be reviewed and approved by the Director of Public Safety, or his/her designee. All requests will be processed through the Request for SCS Operators Form.

2.2 When an incident is discovered, the personnel responsible for the area in question may request Public Safety to review the images
from the camera. As circumstances require, the Director of Public Safety may authorize others to review images. Video recordings held for review will be maintained in their original form pending resolution of the incident. Recording media will be released for erasure, copied for authorized law enforcement agencies, or retained in accordance with applicable law and Mines' policy.

2.3 Third-parties requests for access to recordings or related materials, through a subpoena or under a Colorado Open Records Act (“CORA”) request, must be referred to the Office of General Counsel for review and response.

2.4 Personnel are prohibited from using or disseminating information acquired from Mines’ Security Cameras, except for official purposes. All information and/or observations made in the use of Security Cameras are considered confidential and can only be used for official Mines’ business, law enforcement, and/or criminal investigation purposes upon the approval of the Director of Public Safety.

2.5 Security Cameras will not be utilized to conduct personnel investigations, such as those related to (but not limited to) work place attendance or work quality. However, the University may utilize routine Security Camera recordings in support of disciplinary proceedings against employees and/or students, or in a civil suit or other proceeding involving person(s) whose activities are shown on the recording and relate to the proceeding.

2.6 Security Camera access will be reviewed by the Director of Public Safety on an annual basis.

2.7 Any unauthorized access, including the inadequate protection, inappropriate use, disclosure, or disposal of live or recorded images must be reported immediately to the Director of Public Safety, who will report privacy incidents to Information Security and Compliance and Policy.
REQUEST FORM FOR SECURITY CAMERA SYSTEMS

In order to request a new or update to an existing Security Camera System (SCS), please complete all sections of this form and submit the completed form to the Director of Public Safety, who will forward to the Security Camera Oversight Committee. Colorado School of Mines (Mines) Security Camera Policy, describes under what circumstances a request for an SCS may be considered for approval. It is recommended that this policy be read before completing this form. Any questions should be directed to the Department of Public Safety.

REQUESTOR INFORMATION

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<th>TITLE</th>
<th>DEPARTMENT</th>
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PURPOSE AND JUSTIFICATION FOR SECURITY CAMERA SYSTEM


SECURITY CAMERA SYSTEM DETAILS

Attach a detailed explanation of the SCS, including the physical location of monitoring or recording equipment, camera locations with a brief description of the space in which the monitoring will occur, typical uses of the space, and the activities likely to be monitored by the SCS; capabilities of the camera(s) (video, audio, pan, tilt, zoom, etc.).

PROPOSED OPERATORS- LIST THE PROPOSED OPERATORS (USE REQUEST FORM FOR SCS OPERATOR APPROVAL). IF NECESSARY, ATTACH LIST, INCLUDING REQUEST FORM FOR EACH PROPOSED OPERATOR.


MEASURES TO BE TAKEN TO MINIMIZE IMPACT ON PERSONAL PRIVACY


ORGANIZATION HEAD ACKNOWLEDGEMENT AND SIGNATURE

I assert that the planned deployment of the SCS will comply with applicable laws, regulations, Mines policies and the Mines Security Camera Policy.

__________________________ Date: __________________

Printed Name: _________________________________________

CHIEF INFORMATION OFFICER APPROVAL AND SIGNATURE

☐ Approved

☐ Unapproved

__________________________ Date: __________________

Printed Name: _________________________________________

DIRECTOR OF PUBLIC SAFETY APPROVAL AND SIGNATURE

☐ Approved

☐ Unapproved

__________________________ Date: __________________

Printed Name: _________________________________________
REQUEST FORM FOR SCS OPERATORS

In order to request an individual to become an Security Camera Systems (SCS) operator, please complete all sections of this form and submit the completed form to the Director of Public Safety. Colorado School of Mines (Mines) Security Camera Policy, describes under what circumstances a request for an SCS may be considered for approval. It is recommended that this policy be read before completing this form. Any questions should be directed to the Department of Public Safety.

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PROPOSED OPERATORS

Attach an alphabetical list of proposed operators and include for each proposed operator the following information: proposed Operator’s full name, position, CWID, and contact information; the supervising department head’s name and contact info. Also list the SCS to which the proposed operator would have access, the justification for the access, and any restrictions to the proposed operator’s access to any live and recorded images or video.

PROPOSED OPERATOR’S ACKNOWLEDGEMENT

Attach the written acknowledgement of each proposed operator that they have read, understand, and will comply with all applicable laws, policies, and Mines SCS Policy.

ORGANIZATION HEAD ACKNOWLEDGEMENT AND SIGNATURE

_________________________________________ Date: ________________  
Printed Name: ________________________________

DIRECTOR OF PUBLIC SAFETY APPROVAL AND SIGNATURE

☐ Approved  
☐ Unapproved  
_________________________________________ Date: ________________  
Printed Name: ________________________________

COMPLETED FORM ROUTING

The Director of Public Safety Shall retain a copy of the completed form and return the original copy to the requestor of the named above.