CCS Administrative Procedure
6.00.01-F Security Cameras – Approved Use & Design Standards

Implementing Board Policy 6.00.01
Contact: District Director of Facilities, 533-8630

1.0 Purpose

Community Colleges of Spokane, 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 an effective and efficient manner. This includes establishing and implementing standards that ensure consistency, operational efficiency, maintainability, and maximum utilization of those working and learning environments. These standards represent best use of state resources and are aligned with Community Colleges of Spokane's mission, values and goals.

2.0 Limitations and Requirements

Among the concerns in implementing this procedure is 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.

2.1 The district director of facilities is responsible for administering this procedure in consultation with the chief information officer and district security personnel.

2.2 All district owned and managed facilities are subject to this procedure without exception.

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

3.0 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.

3.1 District Director of Facilities: the administrator responsible for the Facilities Department.

3.2 Facility: a district owned or controlled property, building or component of that property/building.

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 property, safety of faculty, staff, students and visitors, crime deterrent, loss prevention, and general risk management.

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.

3.5 Construction Specifications: provided for use by consultants in designing construction projects. Construction specifications are not subject to this procedure.

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.

4.0 Process for Requesting Installation of a Security Camera

Requests for installation of a security camera system must contain the recommendation of the unit's appointing authority. Such requests will then be considered as follows:

4.1 Request for placement and installation of a security camera system shall be sent to the District Director of Facilities, MS 1016, or facilities@ccs.spokane.edu. Requests will be considered by the District Director of Facilities, in consultation with appropriate facilities, IT and security staff.

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

4.2.1 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.

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

4.2.3 Placement of the proposed surveillance equipment must further CCS' need for the supervision, control, secure, and safe operation of its facilities.

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

4.3.1 Would installation create right to privacy concerns or potentially violate collective bargaining agreements? Concerns shall be forwarded to the Human Resources Office (HRO) for review/direction.

4.3.2 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?

4.3.3 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)?

4.4 Following the above analysis, the district director of facilities will respond to the requesting party and inform of decision.

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

5.0 Security Camera Design Standards

These design standards serve to clarify direction and streamline project execution. They represent the District'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.

5.1 CCS will install only Facilities-authorized brands of security cameras, DVRs and related system equipment. Wiring standards will be as determined by the Director of Maintenance in consultation with the Chief Information Officer.

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.

5.3 In the absence of a written design standard, the Director of Capital Construction will present options to design committees during the schematic design or design development phases so that an informed decision can be made.

5.4 In cases where the consultant, design committee or college administrator determines that the written design standard is not appropriate for the project, and wishes to deviate from the standards, they must seek approval from the District Director of Facilities prior to deviating from the written standard.

5.5 Requests for clarification of and possible alternatives to design standards shall be forwarded to Facilities capital construction staff for consideration and response.

6.0 Legal Considerations and Waivers

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.

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

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.

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

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.”

6.3.1 CCS 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 CCS’ need to supervise, control and efficiently operate our facilities.

7.0 Storage and Retention of Images and Data

7.1 Recorded images will be stored and retained consistent with the capabilities of the system and CCS’ technology capacities. The goal will be to retain images for no less than 30 calendar days and retention may be longer in higher risk areas.

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.

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 HRO staff will take possession and maintain such evidence to ensure chain-of-custody and confidentiality.

8.0 Signage

Signs indicating the presence of video surveillance will be generally posted announcing “This area may be monitored by CCTV.”

9.0 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 Chief Administration Officer.

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