COLLEGE OF MICRONESIA-FSM BOARD POLICY NO. 7006

Closed Circuit Television (CCTV) Monitoring and Recording

Date Adopted: 28 March 2011

Date Revised: 25 September 2013

Date Reviewed: 22-24 March 2014; 25-29 August 2025

References:

A. Purpose

The purpose of this policy is to establish clear guidelines and procedures regarding the responsible use of Closed Circuit Television (CCTV) systems at the College of Micronesia–FSM, National Campus. CCTV is utilized to enhance campus safety, security, and the overall quality of life of students, staff, and visitors by deterring crime and supporting the protection of individuals, facilities, and college property.

B. Scope

This policy applies to all CCTV monitoring and recording systems installed and operated at the National Campus of the College of Micronesia–FSM. It covers the installation, use, access, retention, disclosure, and disposal of CCTV recordings.

C. Definitions

- 1. **CCTV Monitoring.** The live or recorded observation of designated areas using video surveillance equipment.
- 2. **Public Areas.** Locations generally open and accessible to the campus community, such as hallways, entrances, parking lots, and open spaces.
- 3. **Authorized Personnel.** Individuals granted permission to operate or access CCTV systems and footage, including designated staff from Campus Security, IT, and Administrative Services.
- 4. **Reasonable Expectation of Privacy.** Areas where individuals can expect privacy, such as restrooms, locker rooms, or dormitories.

D. Policy Statement

The College of Micronesia–FSM uses CCTV exclusively for legitimate safety, security, and law enforcement purposes. All monitoring activities must be conducted in a professional, ethical, and legal manner that respects the privacy and dignity of individuals.

CCTV will not be used:

- 1. To monitor individuals based on race, gender, ethnicity, sexual orientation, disability, or any other protected classification.
- 2. In private areas where there is a reasonable expectation of privacy.

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E. Acceptable Uses of CCTV Monitoring

Permitted uses include, but are not limited to:

- 1. Protection of individuals, property, and buildings
- 2. Patrolling public areas
- 3. Investigating criminal activity or policy violations
- 4. Monitoring dark spots and problematic or high-risk areas

F. Responsibilities

- 1. The Campus Security and Safety, in collaboration with the Information Technology (IT) Division, oversees the daily operation, placement, and maintenance of CCTV equipment.
- 2. The Vice President for Enrollment Management and Student Services (VPEMSS) is responsible for authorizing all CCTV installations, usage, and access approvals.
- 3. The Vice President for Innovation and Sustainability (VPIS) may be consulted on infrastructure and facilities-related considerations, including camera placement and equipment installation.
- 4. The Vice President for Innovation and Sustainability (VPIS) and the Vice President for Enrollment Management and Student Services (VPEMSS) authorizes all CCTV installations and usage.
- 5. Only the following individuals are permitted to access and review CCTV footage:
 - a. Authorized Campus Security and Safety Supervisors
 - b. Director of Information Technology Office
- The VPEMSS may appoint an auditor to periodically review monitoring operations and storage procedures.

G. Data Security and Retention

- 1. All video recordings must be stored in a secure and access-controlled environment.
- 2. Recordings will be retained for a maximum of thirty (30) calendar days, unless required for an ongoing investigation or legal process.
- 3. Access to CCTV recordings will be logged and restricted to authorized personnel only.
- 4. All footage is the property of the College.

H. Third-Party Access and Disclosure

Requests from third parties (e.g., law enforcement, others) to access CCTV footage must:

- 1. Be submitted in writing
- 2. State the purpose of the request
- 3. Be reviewed and approved at the discretion of the **VPEMSS**
- 4. Follow applicable laws and consult legal counsel if necessary

For purposes of this policy, internal college offices not directly responsible for operating or supervising CCTV systems (e.g., offices other than Campus Security or the Information Technology Office) are also considered third parties.

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These offices must likewise submit a formal written request and receive approval from the VPEMSS based on legitimate institutional needs and applicable policies.

I. Complaints and Misuse Reporting

Members of the campus community who believe CCTV is being misused may submit a written complaint to the VPEMSS. All complaints will be reviewed and investigated confidentially and appropriately.

J. Training and Supervision

All staff involved in CCTV monitoring must be:

- 1. Appropriately trained in the ethical, legal, and procedural aspects of video surveillance
- 2. Supervised by their respective division directors to ensure compliance with this policy

K. Policy Review and Updates

This policy shall be reviewed every two (2) years by the Facilities and Campus Environment Committee (FCE) in coordination with the Campus Security and Information Technology Office to ensure it remains current with legal standards and technological practices.

See Administrative Procedure 7006