

VIRGINIA MILITARY INSTITUTE  
Lexington, Virginia

GENERAL ORDER)  
NUMBER 63)

7 July 2021

**POLICY REGARDING SAFETY AND SECURITY CAMERA USE**

1. **Policy:** This policy addresses the Institute's safety and security needs while respecting and preserving individual privacy. To ensure the protection of individual privacy rights in accordance with state and federal laws, this policy is adopted to formalize procedures for the installation of surveillance equipment and the handling, viewing, retention, dissemination, and destruction of surveillance records.
2. **Purpose:** The purpose of this policy is to regulate the use of Closed Circuit Television (CCTV) security camera systems used to observe and record public areas for the purposes of safety and security. The existence of this policy does not imply or guarantee that security cameras will be monitored in real time 24 hours a day, seven days a week.
3. **Responsibility:** The Deputy Superintendent of Finance, Administration, and Support is responsible for (1) authorizing the selection, installation, coordination, operation, modification, management, and monitoring of all security cameras pursuant to this policy, except for covert security cameras authorized by the VMI Police, and (2) receiving complaints regarding the utilization and/or placement of security cameras and determining whether this policy is being followed. A form is included in this policy outlining the required information to request the installation of a security camera.

Information Technology will review security camera requests to ensure compatibility with existing infrastructure.

VMI Police and Information Technology shall be responsible for: (1) the implementation of this policy and for reviewing requests for security camera installations and, (2) monitoring developments in the law, security industry practices, and technology to ensure that installed security cameras are consistent with best practices and comply with federal and state laws.

Ownership of the CCTV security camera systems belongs to the VMI Police. VMI Police are responsible to: (1) review and recommend to the Deputy Superintendent of Finance, Administration, and Support the specific placement of security cameras after determining conformance to this policy, (2) test and verify the security cameras and supporting systems are working, and (3) notify the Physical Plant of needed repairs.

Physical Plant shall be responsible for installation and routine maintenance of security camera systems.

The Executive Assistant to the Superintendent will review all external public and media requests for release of records and footage obtained through security cameras and present all requests to the Deputy Superintendent

Information obtained through security camera video recording will be used for security and law enforcement purposes. The copying, duplicating,

6. **Access and Monitoring:** All recording or monitoring of activities of individuals or groups by Institute security cameras will be conducted in a manner consistent with VMI policies and state and federal laws, and will not be based on the subjects' personal characteristics or status, including race, sex, color, national origin, religion, age, veteran status, sexual orientation, pregnancy, genetic information, disability, or other protected characteristics. Furthermore, all recording or monitoring will be conducted in a professional, ethical, and legal manner.

All personnel with access to view live video from Institute security cameras must be trained by the VMI Police in the technical, legal, and ethical parameters of monitoring equipment. A copy of this policy and related standards of appropriate use will be provided to users. Upon separation from the Institute, access privileges to the CCTV systems will be withdrawn within 24 hours.

Institute security cameras are not monitored continuously under normal operating conditions, but may be monitored for legitimate safety and security purposes that include, but are not

7. **Appropriate Use and Confidentiality:** Information obtained from security cameras shall be used for safety and security purposes and for law and policy enforcement, including, where appropriate, Cadet functions (Honor Court, General Committee, Executive Committee, Officer of the Guard Association, etc.). Requests for cadet organizations to access live or recorded video will be submitted by the appropriate Officer in Charge of the specific cadet organization to the Deputy Superintendent of Finance, Administration, and Support. Information must be handled with an appropriate level of security to protect against unauthorized access, alteration, or disclosure in accordance with General Order # 21, Records Management Policy, and FERPA.

All appropriate measures must be taken to protect an individual's right to privacy and hold Institute information securely through its creation, storage, transmission, use, and deletion.

All security camera installations are subject to any applicable federal and state laws.

Personnel are prohibited from using or disseminating information acquired from Institute 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 Institute and law enforcement purposes.

8. **Use of Cameras for Criminal Investigations:** Mobile or hidden video equipment may be used in criminal investigations by the VMI Police Department. Covert video equipment also may be used for non-criminal investigations of specific instances which may be a significant risk to public safety, security, and property as authorized by the VMI Chief of Police or his/her designee.
9. **Exceptions:** This policy does not apply to:
- A. Cameras used for academic purposes. Cameras that are used for research are governed by other policies involving human subjects and are, therefore, excluded from this policy.
  - B. Webcams for general use by the Institute (e.g., on the official VMI website).
  - C. Video equipment for the recording of public performances 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.
  - D. Audio/video recording equipment in VMI Police vehicles or department issued body cameras worn by VMI Police Officers.
  - E. Video that is streamed to or posted to the internet for public affairs projects approved by the Deputy Superintendent of Communications and Marketing.
  - F. Automated teller machines (ATMs), which utilize security cameras.
10. **Storage and Retention of Recordings:** No attempt shall be made to alter any part of any security camera recording. Surveillance centers and monitors will be configured to prevent camera operators from tampering with or duplicating recorded information.

All security camera recordings shall be stored for a period of no less than 60 days, after which they may be erased or written over, unless retained as part of a criminal investigation or court proceedings (criminal or civil), in reasonable anticipation of litigation, for administrative or internal investigation, or other bona fide use as approved by the VMI Chief of Police or VMI legal counsel. Individual departments shall not store security camera recordings.

A log shall be maintained by VMI Police of all instances of access to or use of security camera records. The log shall include the date and identification of the person or persons to whom access was granted.

FOR THE SUPERINTENDENT:

Jeffrey R. Boobar  
Colonel, Virginia Militia  
Interim Chief of Staff

DIST: E, Cadets

OPR: FAS

## REQUEST FOR SECURITY CAMERA INSTALLATION

In accordance with General Order 63, request is hereby made to install a security camera or modify an existing security camera as outlined below.

Requestor	Department	Date
Facility/Building/Area Location:		
Describe Purpose of Installation/Modification:		
Describe Security Camera Locations and Monitoring Locations:		
Describe Requirements for Live Feed or Recording:		
Names of Personnel to Have Access to Security Camera System:		
<b>PHYSICAL PLANT Project Information</b>		
Estimated Installation Cost		\$



