## Procedure 902: Reviewing and Handling Campus Camera Footage

Category: Buildings and Facilities

Covered Individuals: All CEI Employees

##### Approved: 03/10/2025

### **902.0 Purpose**

### To establish a standardized and controlled process for reviewing and handling campus camera footage maintained by the Campus Safety Department, ensuring compliance with privacy laws, Idaho’s Public Records Act, FERPA, and security protocols.

**Scope:**
This procedure applies to all security cameras controlled by the College of Eastern Idaho’s Campus Safety Department and outlines the rules and responsibilities for accessing, reviewing, and distributing footage. All requests for footage will be reviewed in compliance with Idaho’s Public Records Act (Idaho Code § 74-101 et seq.), Family Educational Rights and Privacy Act (FERPA), and other applicable laws.

### **902.1 Procedure**

**1. Access to Camera Footage**

1.1. **Authorized Reviewers:**

* The **Director of Campus Safety** or their **designated representative** is the only individual(s) authorized to initially review campus camera footage. In lieu of the Director of Campus Safety, the President and/or legal counsel may initially review campus camera footage.
* No other member of the Campus Safety Department is permitted to access or review camera footage, except as authorized by the Director or their designee.

1.2. **Restricted Access:**

* Camera footage is considered confidential, and unauthorized access is prohibited. Access will be limited to those who have a legitimate, approved reason for viewing the footage. Public access to footage is subject to Idaho’s Public Records Act exceptions and FERPA restrictions.

**2. Request for Footage Review**

2.1. **Footage Request Procedure:**

* **All requests** for footage review must be formally submitted using the **Camera Footage Review Request Form** (see Section 3 below).
* The request form must be **approved by either a Vice President or higher** within the college administration, or by a **member of the college legal team**.

2.2. **Approval Process for Request:**

* Once the request form is submitted, it will be evaluated by the designated approving individual (Vice President or higher or member of the legal team) to ensure:
	+ The request aligns with college policy and Idaho law.
	+ Legal, FERPA, and privacy concerns are addressed.
	+ There is a legitimate need for reviewing the footage.

2.3. **Notification of Approval:**

* Once approved, the request will be forwarded to the Director of Campus Safety (or their designee) for review, and the footage will be retrieved as requested.
* If the request is denied, the individual submitting the request will receive a notification with the reason for denial.

**3. Request Form for Footage Review**

**Camera Footage Review Request Form**

**Purpose:**
This form is used to request permission for the review of campus camera footage. All requests must be approved by a college Vice President, higher administrator, or legal team member.

**Requestor Information:**

* **Full Name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Department/Organization:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Position/Title:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Contact Information (Phone/Email):** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Footage Details:**

* **Date(s) of Footage Requested:**
	+ From: \_\_\_\_\_\_\_\_\_\_\_\_\_
	+ To: \_\_\_\_\_\_\_\_\_\_\_\_\_
* **Time Range of Footage Requested:**
	+ From: \_\_\_\_\_\_\_\_\_\_\_\_\_
	+ To: \_\_\_\_\_\_\_\_\_\_\_\_\_
* **Location(s) of Footage Requested (e.g., building, specific area):**

**Purpose of Request:**

* Incident Investigation
* Security Review
* Law Enforcement Request
* Other (please specify): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Description of Incident/Reason for Request:**
(Provide a detailed explanation of the event, incident, or need for reviewing the footage.)

**Requestor’s Acknowledgment:**
By submitting this request, I acknowledge that I understand the confidential nature of camera footage and agree to follow all applicable college policies regarding access and handling of footage.

* **Signature of Requestor:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Date:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Approval Section:**

**Authorization by Vice President or Legal Team Member**

* **Name of Approving Individual:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Title:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Department:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Reason for Approval/Denial:**
* **Approval Status:**
[ ] Approved
[ ] Denied
* **Signature of Authorizing Individual:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Date:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**4. Public Records Requests**

**4.1. Compliance with Idaho Public Records Act**

**Requests for security camera footage by the general public will be reviewed in compliance with Idaho’s Public Records Act (Idaho Code § 74-101 et seq.). Footage may be exempt from disclosure if it:**

* **Is part of an ongoing security investigation (Idaho Code § 74-105(4)(b)),**
* **Would constitute an unwarranted invasion of personal privacy,**
* **Poses a security risk,**
* **Contains identifiable students, which may trigger FERPA restrictions.**

**4.2. Process for Public Records Requests**

* **Public records requests must be submitted to the college’s Public Records Officer in writing.**
* **The Public Records Officer will review the request and determine if the footage is subject to disclosure, redaction, or exemption.**

**5. Student Footage Requests & FERPA Compliance**

**5.1. FERPA Considerations**

* **If camera footage contains identifiable students, FERPA may apply.**
* **FERPA-protected footage cannot be released unless:**
	+ **The student provides written consent, OR**
	+ **The footage is disclosed under a FERPA exception, such as a law enforcement request or campus safety investigation.**

**5.2. Students Not Authorized to Request Footage**

* **Students are not permitted to request the review or release of camera footage for personal reasons.**
* **If a student requires footage for a college-related incident (e.g., student conduct, disciplinary hearings), the relevant department head must submit the request for Vice President approval.**

**5.3. Requests for Legal Matters**

* **If footage is needed for legal purposes, students may request that the investigating law enforcement officer contact the college’s Campus Safety Director and request to review the footage.**
* **If law enforcement needs a copy of the footage, they must submit legal documentation (e.g., subpoena, court order) to the college legal team (see Section 6.2).**
* **If footage is needed for civil legal purposes, students must provide a subpoena, court order, or other legal documentation to the college legal team.**

**6. Special Protocols for Law Enforcement & Legal Requests**

6.1. **Law Enforcement Footage Requests**

* Law enforcement may request a review of campus security footage by submitting a written request to the Director of Campus Safety.
* The college legal team will review the request and, if appropriate, facilitate the release of the footage to law enforcement according to legal requirements.
* If footage is released to law enforcement, the release must be documented for compliance and legal purposes.

**7. Security and Confidentiality**

7.1. **Confidentiality of Footage:**

* All camera footage is confidential and must be handled securely. Footage may not be shared, distributed, or used for any purpose other than what is explicitly authorized by the college.
* Unauthorized access or misuse of footage is a violation of this college procedure and will result in disciplinary action.

**7.2. Data Security Measures**

* **Storage & Encryption:** All footage will be stored in a **secure, encrypted system** with access **limited** to the Director of Campus Safety and designated personnel.
* **Retention Policy:** Footage will be **retained for 30 days** unless flagged for review, part of an investigation, or subject to a **legal hold**.
* **Audit Logs:** Access to footage will be logged, and any **unauthorized attempts to access footage** will be investigated.

**8. Appeals & Policy Oversight**

* If a request for footage is denied under **Idaho’s Public Records Act**, the requestor may **appeal through the college’s Public Records Officer.**
* If a FERPA-related request is denied, students may **file a complaint with the U.S. Department of Education’s FERPA Office.**
* This policy is subject to periodic **review by the college’s legal team** to ensure compliance with evolving **state and federal laws**.