

SOUTHWESTERN

LAW SCHOOL
Los Angeles, CA

Security Camera Use and Oversight Policy

Administrative policy approved March 2, 2026. Effective immediately.

Revision history: None; new policy.

Related policies: Security Camera Operational Procedures (not published for security reasons); Data Classification and Handling Policy; Policy to Prevent Discrimination, Harassment, and Retaliation; Student Records Policy — FERPA; Workplace Violence Prevention Plan

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A. Purpose and Scope

This policy establishes protocols for Southwestern Law School's use of security cameras and their recordings to enhance campus safety and security. This policy applies to security cameras installed by Southwestern on its premises (e.g., all on-campus buildings, including The Residences, the law library, common areas, and recreational facilities) and to all members of the Southwestern community, including faculty, staff, students, visitors to Southwestern, vendors, and contractors.

Southwestern uses security cameras to enhance campus safety and security while balancing individual privacy. The framework established by this policy seeks to ensure that security cameras used on campus are operated in accordance with Southwestern policies and applicable law.

In general, security cameras are intended to serve three main purposes for the Southwestern community:

- **Personal safety:** to proactively identify potential and actual threats to personal safety and to capture video, if an individual is the subject of harm or a crime, that provides information or evidence of what occurred and who is responsible, and thereby deter crimes or harmful conduct toward individuals.
- **Property protection:** to capture video, in the case of lost, stolen, or damaged property, that provides information or evidence of what occurred and who is responsible.
- **Deterrence:** to discourage criminal activity, policy violations, and harmful conduct toward individuals or property through the visible or known presence of security cameras.

B. Definitions

1. **Security camera:** a device used to advance the safety and security of the Southwestern community that can transmit a signal containing images that can be viewed remotely by authorized Southwestern personnel. This policy applies only to security cameras installed by Southwestern for surveillance purposes. For example, classroom cameras used for remote learning are not considered security cameras and are therefore not covered by this policy.
2. **Security camera monitoring:** viewing security camera images in real-time by authorized Southwestern personnel or authorized vendor personnel acting under Southwestern's direction.

3. **Security camera recording:** the digital, analog, or other electronic storage of the feed from a security camera, or an image derived from that recording.
4. **Security camera system:** any electronic service, software, or hardware directly supporting (e.g., configuring, controlling, and recording images from) a security camera.

C. **Implementation and Procedures**

The implementation of this policy is governed by the Security Camera Operational Procedures, which outline internal procedures for camera installation, system access, monitoring, data retention, emergency exceptions, and related operational practices. That related policy is maintained by the Director of Campus Safety & Security and is available to authorized personnel. Because of the sensitive nature of the information, the policy is not published or available to the general Southwestern community. Instead, the policy is provided to individuals with responsibilities under it or who otherwise have a legitimate need to know its contents.

D. **Security Camera Placement and Decision-Making**

The Chief Operating Officer and the Director of Campus Safety & Security, in consultation with the Chief Information Officer, have the authority to determine whether and where to install security cameras on Southwestern premises. The President & Dean and the Board of Trustees may also direct the installation of cameras. Camera placement decisions will be based on various factors, including risk assessments, safety concerns, vulnerabilities, feasibility, privacy expectations, and historical criminal activity. Southwestern will not install “dummy” or placebo security cameras that do not operate.

Complaints concerning security camera placement or operation may be submitted to the Director of Campus Safety & Security. In consultation with the General Counsel’s Office, the Director will evaluate each complaint by weighing the potential safety benefits of the camera’s placement against privacy, policy compliance, and other relevant concerns. The Southwestern officials named in this section may determine that a camera should be relocated, deactivated, or removed.

E. **Limitations**

The installation of security cameras and the adoption of this policy do not constitute a commitment by Southwestern to provide continuous live monitoring of all locations covered by the security camera system or a While Southwestern

makes reasonable efforts to ensure that security cameras and related systems are operational, this policy does not guarantee that all cameras, monitors, hardware, or software systems will be functioning at all times. .

Because not all security cameras are continuously monitored, faculty, students, staff, and visitors should take appropriate precautions for their personal safety and the protection of their property. Faculty, students, staff, and visitors should report suspicious or criminal activity directly to Campus Security and not assume the activity was observed via the security camera system.

In addition, the presence of security cameras on campus is not intended to provide comprehensive surveillance coverage. Cameras are installed in selected locations based on safety priorities, risk assessments, feasibility, and resource availability. This policy does not imply that all sensitive areas are monitored or that a certain number of cameras are deployed.

F. Legal and Policy Compliance

Southwestern's use of security cameras and related systems will comply with all applicable legal and regulatory requirements, including but not limited to:

- The Family Educational Rights and Privacy Act (FERPA), which governs access to and disclosure of student education records;
- Applicable federal and state privacy, surveillance, and wiretap laws, including California laws prohibiting the use of audio recording devices without the consent of all parties and restricting surveillance in areas where individuals have a reasonable expectation of privacy;
- State and federal anti-discrimination and civil rights laws, including those that prohibit surveillance or targeting based on protected characteristics.

Any security camera recordings maintained by Southwestern that are directly related to an identifiable student and used for disciplinary or other educational purposes will be handled as student education records in accordance with FERPA and the Student Records Policy — FERPA. Southwestern will also adhere to the Data Classification and Handling Policy when storing and managing security camera recordings, as well as to the Policy to Prevent Discrimination, Harassment, and Retaliation, when conducting any monitoring, review, or use of security camera recordings.

G. Privacy and Notice

Southwestern is committed to striking a balance between using security cameras for campus safety and protecting the privacy rights of its community members.

Accordingly, the following principles govern the placement, operation, and notice of security cameras:

1. Prohibited areas

Southwestern will not install security cameras in any location where individuals have a reasonable expectation of privacy. These locations include, but are not limited to:

- Restrooms;
- Locker rooms and changing areas;
- Private offices (unless consent is provided or the installation is for a specific, approved security investigation);
- Individual residential units within The Residences; or
- Any location where surveillance would violate legal standards or reasonable expectations of privacy.

2. Camera positioning

Where possible, Southwestern will position cameras to avoid capturing the interior of private or residential spaces through windows or open doors.

3. Signage and notice

Where possible, Southwestern will post signs or other reasonable notice of the presence of security cameras in monitored areas.

4. Monitoring standards

Only authorized personnel may monitor security camera footage, including both live feeds and security camera recordings. Southwestern prohibits the use of security cameras for personal curiosity or routine performance evaluations of faculty or staff. However, if behavior implicating job performance, misconduct, or a violation of Southwestern policy is incidentally captured in the normal course of security monitoring or through a documented concern or report, that footage may be reviewed and used in accordance with relevant disciplinary or investigative procedures.

5. No audio recording

Consistent with applicable state and federal laws, Southwestern will not use security cameras to monitor or record audio.

6. Respect for academic and personal activities

Southwestern will not use cameras to monitor academic instruction, personal conversations, or private meetings unless specifically authorized for an investigation into a safety or legal matter and approved by the Director of Campus Safety & Security in consultation with the General Counsel's Office.

H. Emergency Exceptions

In limited circumstances, such as active incidents or emergencies posing an imminent threat to personal safety or institutional property, the President & Dean, the Chief Operating Officer, the Director of Campus Safety & Security, or the General Counsel's Office may permit time-limited access to live or recorded camera footage to support emergency response. Any such access must be consistent with applicable law and institutional safeguards.

I. Violations

Violating this policy may result in disciplinary action, up to and including termination of employment or engagement.

J. Policy Revisions

Southwestern expressly reserves the right to change or modify any aspect of this policy at any time, with or without prior notice.