

Sauk Valley Community College
September 28, 2020

Action Item 4.1

Topic: *430.01 Information Security – Second Reading*

College Health Metric: **Campus Environment – College facilities and grounds are clean and updated. The campus is safe, secure and welcoming.**

Presented By: **Dr. David Hellmich, Eric Epps, Dr. Jon Mandrell, and Dr. Lori Cortez**

Presentation:

The administration has drafted revisions to this policy to include applicable statutes and language specific to security cameras, which have been installed throughout the campus. See below.

Recommendation:

The administration recommends the Board approve revisions to *430.01 Information Security* as presented for a second reading.

430.01 Identity Theft Prevention

~~The College will develop, implement and maintain an Identity Theft Prevention Program as an administrative procedure to reduce the risk of data loss and identity theft to the College, to students and to employees. The Program developed, implemented and maintained shall follow the relevant requirements provided in the Federal Fair and Accurate Credit Transaction Act (FACTA) of 2003 and the Fair Credit Reporting Act (FCRA), along with the applicable implementing regulations for both FACTA and FCRA. The Board will name a Compliance Officer for the Program, who shall have the duty to oversee the Program. The President shall review the Program with the Board upon its initial implementation and thereafter, shall review the Program with the Board not less frequently than annually. Violation of the Program may be grounds for discipline.~~

430.01 Information Security

1. Applicable Statutes

- a. 12 USC 1681 (Fair Credit Reporting Act)
- b. 12 USC 1811 (Gramm-Leach-Bliley Act)
- c. 20 USC 1232g, 34 CFR 99 (Federal Education Rights and Privacy Act)
- d. 15 USC 1601 (Federal Fair and Accurate Credit Transaction Act)
- e. 720 ILCS 5/26-4

2. Information Security Program

- a. The College will develop, implement, and maintain an Information Security Program as an administrative procedure to reduce the risk of data loss and identity theft to the College, its students, and its employees. The College will name a Compliance Officer for the Program, who shall have the duty to oversee the Program. The President shall review the Program with the Board upon its initial implementation and thereafter, shall review the Program with the Board not less frequently than annually. Violation of the Program may be grounds for discipline.

3. Security Cameras

- a. Installation of security cameras on the SVCC campus is for the safety and welfare of employees, students, and patrons. Videos or recordings generated from the cameras will be used as a surveillance tool to deter criminal activity and to protect the campus.
- b. The exact location, number, and function of all cameras will generally be considered confidential for security purposes and not be released to the general public, guests, or employees. No audio shall be recorded, and camera positions shall not violate the standard of a reasonable expectation of privacy.
- c. This statement does not in any way imply or guarantee that video surveillance devices will be indefinitely operational or actively monitored at any time. The presence of physical video surveillance does not in any way imply that activity is recorded or monitored.
- d. All recording or monitoring of activities of individuals or groups by college security cameras will be conducted in a manner consistent with College policies, state and federal laws, and investigative agency policies, and it will not be based on the subjects' personal characteristics, including age, color, disability, gender, national origin, race, religion, sexual orientation, or other protected characteristics. All personnel with access to college security cameras shall be trained in the effective, legal, and ethical use of monitoring equipment.
- e. Video surveillance equipment will not be used to evaluate the performance of employees. Surveillance equipment will not be utilized to observe employee performance or otherwise be accessed as documentation in the employee evaluation process.