

IN-15-16-2

Approved by Vice-Chancellor
of Business Affairs: 4-13-2016

Security Camera Policy

Purpose and Principles

The purpose of this policy is to regulate the use of security cameras on campus.

The principles of this policy:

1. Enhance the health and safety of the university population and protect university property.
2. Respect the privacy of members of the campus community and guests.
3. Support the mission of the Division of Public Safety.
4. Support the mission of the university.
5. Provide transparency in the use of video camera technology in achieving a safe and secure campus environment.

Security cameras will be used in a professional and ethical manner in accordance with university policy and local, state and federal laws and regulations.

Definitions

As used within this policy, the following terms are defined as follows.

- **Security camera:** a camera used for monitoring or recording public areas for the purposes of enhancing public safety, monitoring restricted areas or equipment, to discourage theft and other criminal activities, and for preventing, investigating, and resolving incidents. The most common security cameras rely on closed circuit television.
- **Security camera monitoring:** the real-time review or watching of security camera feeds.
- **Security camera recording:** a digital or analog recording of the feed from a security camera.
- **Security camera viewing:** the reviewing or watching of historical security camera feeds.
- **Security camera systems:** any electronic service, software, or hardware directly supporting or deploying a security camera.

Responsibilities and Authority

Responsibility for oversight of security cameras and associated policies, standards, and procedures, is delegated by the Vice Chancellor of Business and Finance to the Director for Public Safety/Chief of Police. This responsibility includes:

1. Creation, maintenance, and review of a campus strategy for the procurement, deployment, and use of security cameras, including this and related policies
2. Designation of the standard campus security camera system or service
3. Authorizing the placement of all security cameras
4. Authorizing the purchase of any new security camera systems
5. Reviewing existing security camera systems and installations and describing required changes to bring them into compliance with this policy
6. Creating and approving campus standards for security cameras and their use
7. Creating and approving the procedures for the use of security cameras
8. Public Safety and those required to support the security system will have access to all images and data.
9. Approving individuals, positions and/or departments that have access to the real-time and/or recorded camera feeds for an individual or bank of cameras.
10. Review and approval of department policies and procedures related to employee and departmental use of the security camera system.

Control Elements

1. Security Camera Placement
 - a. Public Safety may establish temporary or permanent security cameras in public areas of the campus.
 - b. Audio recordings or live review of audio are prohibited, except in an emergency or as allowed by law.
 - c. Security cameras may not be used in private areas of the campus unless authorized by law or in an emergency.
 - i. Private areas include residence hall rooms, bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothes, and private offices. Additionally rooms for medical, physical, or mental therapy or treatment are private. Where Security Cameras are permitted in private areas, they will to the maximum extent possible be used narrowly to protect money, real or personal property, documents, supplies, equipment, or pharmaceuticals from theft, destruction, or tampering.
 - d. To the maximum extent possible security cameras shall not be used to get close-up video through the windows of any private residential space or office. If possible, electronic shielding will be placed in the security camera so that the security camera cannot be used to look into or through windows.
 - e. To the maximum extent possible, security cameras shall not be directed at the windows of any private building not on University property.
2. Security Camera Historical Review and Live Monitoring
 - a. The University Police may monitor and review security camera feeds and recordings as needed to support investigations, enhance public safety and support the mission of Public Safety.
 - i. With the approval of the Director of Public Safety/Chief of Police, others authorized, may review historical recordings or live images for purposes of public safety, support the mission of the university or legitimate business needs of the individual departments granted access to the system.

1. All approved employees will be trained on the restrictions of camera operations and privacy rights.
 - ii. Monitoring individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other protected classification is prohibited.
 1. Unauthorized viewing of real-time, recorded or historical camera feeds is prohibited and may result in employee discipline and may be actionable in both civil and criminal law.
 - iii. Copying, storing, or distribution of images must be authorized by the Director of Public Safety/Chief of Police or their designee.
 1. A designee may be an individual(s), position(s) and/or department(s)
 2. Any unauthorized, copying, storing, or distribution of security camera images is prohibited and may result in employee discipline and may be actionable in both civil and criminal law.
3. Use of Recordings
 - a. Images will be maintained for a minimum for 14 days and no longer than 120 days, unless part of an active investigation or needed to support the mission of Public Safety or the University.
 - i. Information that directly affects an investigation will be kept until no longer necessary and may be subject to established evidentiary standards and following university records retention policies and procedures.
 - b. Security camera recording may be used in the course of a complaint against the university or university employee and in the course of personnel investigations.
 - c. Recording of cameras whose primary function is not security (such as classroom lecture capture) may, with the authorization of the Director of Security/Chief of Police or their designee, be used for the purposes described in the definition of security camera. The unit head will be advised of the video was acquired unless that notice will negatively impact an investigation or otherwise hamper university mission or operations

Compliance

The Director of Public Safety/Chief of Police will ensure that records related to the use of security cameras and recordings from security cameras are sufficient to validate compliance with this policy. Units that maintain or support security camera technology must also maintain records and configure systems to ensure compliance with this policy.

The Director of Public Safety/Chief of Police, Chief Information Officer, Campus Compliance Officer or their designees will periodically review compliance and the technology security on the security camera systems. A failure to meet the requirements of this policy may result in loss of the privilege to support, maintain, or deploy security cameras at the discretion of the Director of Security/Chief of Police.