



Administrative Procedure

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Subject: VIDEO SURVEILLANCE

1.0. PURPOSE:

The purpose of this procedure is to provide guidelines for the use of video camera monitoring, recording and surveillance on University property in a way that enhances security and aids law enforcement while recognizing the reasonable expectation of privacy among members of the University community. This procedure shall not apply to legitimate uses of cameras for instructional purposes.

The existence of this procedure does not imply or guarantee that cameras will be monitored in real time continuously or otherwise.

2.0. ORGANIZATIONS AFFECTED:

2.1. All organizational units of the University.

2.2. If auxiliary organizations select to install video security camera systems that are viewed by University Police Dispatch, they must operate and maintain all components in line with this procedure and provide emergency access into those monitored areas to responding University Police employees.

3.0. REFERENCES:

3.1. Guidelines currently in operation at campuses in the California State University (CSU) system and nationwide.

4.0. PROCEDURE:

4.1. The University may employ video cameras and digital video recorders (DVR) on University property for any legitimate purpose including, but not limited to deterring crime, assisting police in criminal investigations, and protecting the safety and property of the campus community. Use of this type of equipment requires approval as noted below.

4.2. Exclusions:

4.2.1. University-sanctioned video recording of University athletic or performing arts events is excluded from this procedure.

Approved: _____

Date: _____

- 4.2.2. There are exceptions where cameras may be installed in testing locations, lab environments or other academic environments. All exceptions must be approved by the appropriate administrator for that area.
- 4.2.3. Web cameras used in an office or non-public space are excluded from this procedure.
- 4.2.4. Video conference equipment installed on campus is exempt from the procedure.
- 4.2.5. This procedure does not apply to cameras used covertly by University Police or another law enforcement agency for criminal surveillance as governed by the federal and state laws.
- 4.2.6. Web cameras installed by the University to communicate construction progress or other University-related projects of general interest to constituents must be coordinated through University Police.
- 4.3. Requirements:
 - 4.3.1. Any use of video recording equipment must conform to state and federal laws and be managed in a professional, ethical manner.
 - 4.3.2. No video surveillance or recording equipment may be installed on campus without the approval of the University Police unless explicitly excluded in this procedure.
 - 4.3.3. The purchase of all security related video surveillance and recording equipment must be coordinated through University Police.
 - 4.3.4. Information obtained through video surveillance recordings will be used only for legitimate University purposes, including, but not limited to security and law enforcement. Only those responsible for investigation and enforcement of laws/policies will have access to the recorded video. Access to recorded video is subject to University Police approval.
 - 4.3.5. Comments or questions regarding the use of video surveillance and recording equipment must be made in writing to University Police.
 - 4.3.6. Virtual or fake cameras cannot be installed on campus.
 - 4.3.7. Cameras may not be established in non-public areas of the campus.
 - 4.3.8. Video surveillance cameras shall not be directed or zoomed into the windows of any private residential building including residence halls.
 - 4.3.9. Use of video surveillance cameras shall be accompanied by signage indicating use of such cameras with signage appropriate to the facility and camera placement. Signage content and placement must be approved by University Police in consultation with University Counsel, if appropriate.
- 5.0. DEFINITIONS:
 - 5.1. Digital Video Recorder (DVR) – Any device that is used to record, store and play video for video camera(s).

- 5.2. Data Storage System – A computer or electronic device dedicated to the purpose of storing data.
 - 5.3. Monitoring – Refers to viewing live or recorded images from cameras and monitors that have been approved for use on the campus for the purpose of enhancing security and aiding law enforcement.
 - 5.4. Permanent Video Surveillance Cameras – Cameras which may be established as part of the campus infrastructure. Placement of permanent cameras requires joint approval by the Vice President for Administration and Chief Financial Officer and the University Police Chief.
 - 5.5. Non-public Areas - Areas such as bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothing, or private offices. The only exceptions are cameras used narrowly to safeguard money, documents, or supplies from theft, destruction, or tampering.
 - 5.6. Public Area – An area open for public use where the expectation of privacy is not violated by what could normally be openly observed, such as campus parking lots and structures, an academic hallway, classroom, library study rooms, and all outdoor areas.
 - 5.7. Surveillance – For purposes here, refers to a more focused type of observation on an individual or group of individuals that involves a closer degree of scrutiny related to the reasonable grounds to believe the person(s) who are the target of the surveillance are engaging in or have engaged in unlawful activity. For any surveillance activity to occur, there must be some connection between the information collected and unlawful activity and it must be approved by the University Police Chief or his/her designee prior to being conducted.
 - 5.8. Temporary Video Surveillance Cameras – Cameras that are established by University Police to provide additional security for a campus event or situation, and that are not in place for more than thirty (30) days.
 - 5.9. Video Surveillance Camera – A camera device that is capable of capturing images (not audio), viewable by the naked eye and transferring such images to a data storage system. Image capture may use any technological format.
- 6.0. RESPONSIBILITIES:
- 6.1. The President or designee will:
 - 6.1.1. Review any video monitoring system specifications that vary from the norm established by this procedure for approval or denial.
 - 6.1.2. Monitor the requests for video monitoring systems to ensure costs, benefits, and risk factors are considered appropriately.

6.2. Administrative Authorizing Officers will:

- 6.2.1. Be responsible for the full implementation of the responsibilities provided in this procedure within their respective areas.
- 6.2.2. Review requests for video monitoring from personnel within their assigned scope of responsibility and determine if the circumstances presented justify the action. Approval by the authorizing administrator must be obtained prior to installation.
- 6.2.3. Assist University Police and University officials to identify potential security issues and the design of adequate security measures.
- 6.2.4. Report malfunctioning monitoring systems and components to University Police and assist in promptly coordinating maintenance/repairs to ensure continual security.
- 6.2.5. Control and limit access to data storage systems that are stored and operated locally.

6.3. The University Police Chief or designee will:

- 6.3.1. Review and approve as appropriate requests for video camera systems after the completion of an examination of the conditions requiring the monitoring.
- 6.3.2. Ensure monitoring of the video camera systems reporting to University Police Dispatch are operational on a continual basis through regular testing and the recording of all inspections and malfunctions in a database system.
- 6.3.3. Assist and collaborate on the development and implementation of a security plan for the campus community encompassing video camera monitoring systems and additional safety enhancements.
- 6.3.4. Document abuse and misuse of video camera monitoring systems and equipment, and, if applicable, restitution may be requested through the appropriate criminal and/or administrative court systems from the responsible parties for the necessary repairs plus an administrative fee.

7.0. PROCEDURES:

7.1. Installation and Operation of Video Camera Monitoring Systems

- 7.1.1. University Police currently monitors video surveillance cameras located in public areas on campus. These cameras capture images only, no audio.
- 7.1.2. University Police oversees installation and maintains video camera monitoring systems throughout the University through an outside vendor and service company approved through Financial Services. Monitoring cameras, devices, recording units, and all associated wiring, cabling, network connections, and associated costs are the

responsibility of the facility in which they are installed. Exceptions would be negotiated on a case-by-case basis between the department and University Police. For newly constructed or renovated facilities, University Police is to be included in and have input in program design meetings for all projects on the University that include video camera monitoring systems as a part of the design and eventual monitoring.

- 7.1.3. Prior to adding video camera monitoring systems to any location, departments must request a site inspection by a University Police employee to determine minimum requirements for the area. Departments are required to receive approval from University Police prior to installation of any video camera systems that will not report to University Police Dispatch for monitoring, where there are no life safety considerations and where the primary function of security is to provide only a digital recording to deter theft or promote overall safety. The department will draft a Memorandum of Understanding (MOU) for that type of video camera monitoring system that records locally and provide the MOU to University Police. Locally recorded camera systems are required to be tested at least monthly by the personnel within the department they were installed to ensure images are being captured. A record of this testing must be maintained by the department.
- 7.1.4. All costs for purchase and installation of video camera monitoring systems shall be borne by the appropriate project budget or the department or unit making the request, with the understanding that meeting the minimum standards is required.
- 7.1.5. Once installation is complete, University Police and the installing contractor will conduct a final check to verify that the system has been installed as proposed, that it meets all safety and security requirements, and conforms to all video camera monitoring systems installation standards available in University Police. Other required items can include, but are not limited to:
 - maps labeled with room numbers in alarmed area(s); and
 - floor plans of the area the video camera monitoring systems are installed.
- 7.1.6. All new video camera monitoring system installations on campus must have accompanying user training provided by University Police personnel and, if required, by the vendor that installed the device(s). Periodic training will be provided on an as needed basis.
- 7.1.7. All camera purchases occurring subsequent to the implementation of this procedure must meet the guidelines of this procedure.
- 7.1.8. Placement of video surveillance cameras shall be the responsibility of the University Police Chief and shall conform to applicable federal and state laws.
- 7.1.9. Individual departments, programs, or organizations wishing to permanently install video monitoring cameras shall submit a written

request to the appropriate dean, director, or department head with a statement justifying the benefit of installing such equipment. The statement must include the proposed number and location of the device(s), as well as the purpose of the installation, whether the location of the cameras involve recording of activity by students, employees or the general public, and the name and title of the individual who will be responsible for reviewing the locations. The source of funding for the installation must be specifically identified as part of the request.

7.1.10. The appropriate administrator receiving a request for video camera monitoring systems, if approved, will forward the request along with his/her recommendation to the University Police Chief. The University Police Chief, or his/her designee, will review the request with the submitting authority and determine proper action to be taken.

7.1.11. University Police will oversee and coordinate installation of any video camera monitoring systems with a designated contractor. The contractor will coordinate integration of the system with University Police.

7.1.12. No researcher or organization, whether faculty, staff, student, or the general public, is authorized to use these cameras or recordings from the cameras for research purposes.

7.1.13. Monitors for video equipment shall be installed in controlled-access areas and shall not be viewable by unauthorized persons.

7.2. Training

7.2.1. Camera control operators, and all persons with remote access ability to control cameras, shall be trained in the technical, legal and ethical parameters of appropriate camera use.

7.2.2. Camera control operators, and all persons with remote access ability to control cameras, shall receive a copy of this procedure and provide written acknowledgement that they have read and understood its contents.

7.3. Data Storage and Retrieval

7.3.1. Recordings will be stored in a manner consistent with available technology and transported in a manner that preserves security. Both current and archived recordings will be secured. All storage and access to recordings will be accessible to University Police as directed by the University Police Chief.

7.3.2. Recordings used in law enforcement investigations or criminal prosecutions shall be retained until the end of the court or judicial proceedings and appeal period unless directed otherwise by a court.

- 7.3.3. Recordings may also be retained for other bona fide reasons as determined by University Police, in consultation with University Counsel.
- 7.3.4. Recordings shall be retained for ninety (90) days and then will be erased or recorded over unless retained as part of a criminal investigation, a civil or criminal court proceeding, or pursuant to a preservation request issued by the Office of University Counsel.
- 7.3.5. No attempt shall ever be made to alter any recording. Editing or otherwise altering recordings or still images, except to enhance quality for investigative purposes, is strictly prohibited.
- 7.3.6. Transmission of recordings using the Internet or campus network will use encryption technology to ensure that recordings are not improperly accessed.
- 7.3.7. For FERPA purposes, recordings with information about a specific student are considered law enforcement records unless the University uses the recording for disciplinary purposes or makes the recording part of the educational record.
- 7.3.8. Any person who tampers with or destroys a camera, a recording, or any part of the electronic surveillance system may be prosecuted in the criminal justice system as well as through the campus judicial process.

8.0. APPENDICES:

N/A