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## Policy PO003: CCTV & Intrusion Alarm Policy

Recommended for Approval by:

*Susanne Fenske*

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### A. Intent

As a law enforcement entity, University Police have the right and the duty to protect PennWest University's faculty, staff, students, visitors and invitees from the improper use of our corporate data, property and facilities. This can be done, in part, with a well-implemented Closed-Circuit Television (CCTV) and a covert video surveillance system, a technology that can remotely monitor and record activity across campus.

The primary purpose of utilizing security cameras in public areas is to deter crime and to assist law enforcement in enhancing the safety and security of members of the University community and University property. The primary use of security cameras will be to record video images for use by law enforcement and other University officials charged with investigating alleged violations of law or University policy.

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

In addition, the intent of this policy to ensure that all intrusion alarms installed in PennWest University facilities are approved by the PennWest University Police. Any intrusion alarm being considered shall comply with any local permit requirements if independently monitored, or be compatible with an existing Central Alarm Console

## **B. Definition(s)**

**CCTV – Closed Circuit Television** - Is a remote monitoring system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes.

**Covert Camera** – A camera that is concealed.

**Intrusion Alarm** - A system designed to detect intrusion, such as unauthorized entry, into a building or other secured area such as a home or school. This excludes panic alarms.

## **C. Policy**

### **Placement of Cameras**

Security cameras may be installed in situations and places where the security and safety of either property or persons would be enhanced. Cameras will be limited to uses that do not violate the reasonable expectation of privacy as defined by law. Where appropriate, the cameras may be placed campus-wide, inside and outside buildings.

1. University Police shall be solely responsible for the oversight of temporary or permanent security cameras on campus. As such, all installations must be approved by them. Schools, departments and offices desiring the installation and use of security cameras shall submit a request for such installation to University Police.
2. Private areas will be respected, meaning no surveillance will be conducted in areas of expected privacy. This idea of “expected privacy” includes areas such as bathrooms, locker rooms, changing and dressing rooms, student dormitory rooms in the Residence Halls, classrooms not used as a lab, and other areas where a person may expect a certain level of personal privacy. In addition, a camera must never be installed in a private office unless the party occupying said office requests the camera.
3. The use of covert cameras for non-criminal investigations involving represented employees will be disclosed at the appropriate collective bargaining Meet and Discuss Meeting. However, identification of the location of the covert camera(s) will not be shared.
4. The placement of any covert camera must be authorized by the Chief of Police and the Vice President responsible for the respective area with regard to the desired installation location.
5. Consistent with the requirements of state law, security cameras utilized by the University will not record or monitor sound. Audio recordings shall be prohibited unless permitted by law and specifically authorized by the Chief of Police.
6. In cases of new construction, camera installations and associated technical issues will be approved during the planning phase of the project.

## **Security Camera Monitoring and Review**

The University Police may monitor and review security camera feeds and recordings as needed to support investigations and to enhance public safety. It is not intended or expected that security cameras will be routinely monitored in real time. Cameras are used as an investigation tool and are not intended to provide security.

1. With the prior approval of the Chief of Police, other University personnel may monitor and review security camera live feeds for purposes of public safety.
2. PennWest University forbids the collection of data involving any person's beliefs, opinions, associations or other First Amendment rights.
3. Recorded video media will be stored for a period of approximately thirty (30) days and will then be erased, unless retained as part of an investigation or court proceeding (criminal or civil), or other bona fide use as approved by the Chief of University Police.
4. Personnel are prohibited from using or disseminating information acquired from university security cameras, except for official purposes. All information and/or observations made in the use of security cameras are considered confidential and can only be used for official university and law enforcement purposes.
5. Staff involved in reviewing video will be trained and supervised in the responsible use thereof. Training will be provided by the vendor responsible for camera system install/maintenance.

## **Use of Recordings**

Since cameras are not monitored, our recording/playback function affords University Police to playback, review, and archive data to a portable media device. Individual privacy protection must be paramount and the Family Educational Rights and Privacy Act (FERPA) and the Stored Communications Act, 18 U. S. C. 2701-2711 (Title II of the ECPA) compliance considered from all perspectives. With that in mind, in the event a third-party law enforcement entity request permission to view or receive a copy of the data, they must present a written request to the Chief of Police. The Chief of Police, in consultation with the Office of General Counsel, will review and respond to the request from outside law enforcement to release recordings obtained through CCTV monitoring.

Requests for CCTV recordings or review of CCTV footage made in connection with internal investigations of disciplinary matters of Students or employees will be forwarded to the Chief of Police. The Chief of Police will review such requests and approve or deny such requests. The Dean of Students or Director of Human Resources will then render a decision regarding the appropriateness of use or of the recordings for Disciplinary Matters.

Only authorized personnel may review, playback, archive or save data to a portable device.

## **Intrusion Alarms**

Intrusion alarms shall only be installed with approval of the Chief of Police. Once approval is granted the requestor is also responsible for funding of any installation costs or monitoring fees through established University approval processes.

#### **D. Procedure(s)**

##### **Requesting Access to Camera System**

Any request for viewing live cameras must be submitted to University Police in writing. Rights can be assigned on a per camera basis, so the request should specify which cameras need to be accessed and the reason for the request. Costs of client licensing will be the responsibility of the Department requesting access to the system.

##### **Requesting Access to Archived Footage**

Due to the potentially sensitive nature of the footage, only University Police and designated University Technology Services staff will be able to access archived camera footage.

#### **E. Related policies**

Acceptable Use Policy

#### **F. Contact Information**

#### **G. Policy Review Schedule**

The PennWest University Chiefs of Police will review this policy annually and will provide ongoing oversight of the CCTV operations and recommend revisions if needed.