Camera Use

Policy Type: Administrative
Responsible Office: VCU Police Department
Initial Policy Approved: 12/04/2015
Current Revision Approved: New

Policy Statement and Purpose

VCU is committed to enhancing the quality of life of the campus community by integrating the best practices of safety and security with technology. A critical component of a comprehensive security plan is the utilization of a security and safety camera system. The surveillance of public areas is intended to deter crime and assist in protecting the safety and property of the VCU community.

To ensure the protection of individual privacy rights in accordance with the university’s ethical standards and state and federal laws, this policy is adopted to formalize procedures for the installation of surveillance equipment and the handling, viewing, retention, dissemination, and destruction of surveillance records. The purpose of this policy is to regulate the use of camera systems used to observe and record public areas for the purposes of safety and security. The existence of this policy does not imply or guarantee that cameras will be monitored in real time 24 hours a day, seven days a week.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

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Who Should Know This Policy

Departments that participate in access monitoring including, but not limited to, VCU Police Department ("VCUPD"), VCU Facilities Management Department ("FMD"), and VCU Technology Administration Department ("IT") are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

**Closed Circuit Television ("CCTV")**
A television system in which the video signals are transmitted from one or more cameras to a restricted set of monitors.

**Research Camera**
A camera used for monitoring or recording research or laboratory facilities to advance education. The most common research cameras are digital and high resolution.

**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.

**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 systems**
Any electronic service, software, or hardware directly supporting or deploying a security camera.

Contacts

VCUPD officially interprets this policy. VCU Police Security Division is responsible for obtaining approval for any revisions as required by the policy through the appropriate governance structures. Please direct policy questions to Office of AVP/Chief of Police.

Procedures

1. **Responsibility**
   a. The VCUPD has the authority to select, coordinate, operate, manage, and monitor all campus security surveillance systems pursuant to this policy. All departments using camera surveillance are responsible for implementing and complying with this policy.
   b. VCUPD shall monitor developments in the law and in security industry practices and technology to ensure that camera surveillance is consistent with the best practices and complies with all federal and state laws.
c. VCUPD and IT will assess new camera locations. An annual evaluation of existing camera locations and incidents will be conducted.

d. Maintenance and testing will be the responsibility of VCUPD and IT or designated department when applicable.

e. VCUPD will review any complaints regarding the utilization of surveillance camera systems and determine whether the policy is being followed. Appeals of a decision made by the Chief of Police will be made to and reviewed by the Vice President of Finance and Administration for decision.

f. All VCU personnel have a duty to report any person who tampers with or destroys video security equipment and follow the procedures set forth in the Duty to Report Policy located at http://www.assurance.vcu.edu/policylibrary.html.

g. Anyone who tampers with or destroys video security equipment will be subject to criminal prosecution and/or campus judicial action.

2. Authorization & Installation

a. Individual departments, program, campus organizations, or campus vendors will determine if the request is for a security or research camera. (Refer to the FAQs Section for details regarding the Camera Approval Process Flow Chart)

b. Requestor will seek approval from the respective department dean or vice president with the proposed location of surveillance devices, justification of the proposed installation, and identification of funding source(s) for purchase and ongoing maintenance. The justification should identify the specific business reasons for surveillance cameras and desired outcomes; objectively document how video surveillance helps achieve the outcomes; any potential loss of individual privacy where there is a reasonable expectation of such privacy; and attempt to identify alternatives with less risk.

c. Individual departments, programs, campus organizations, or campus vendors shall complete a Camera Security Request Form and submit to the VCU Police Department at cpcamrequest@vcu.edu requesting an assessment of the proposed installation.

d. VCUPD will coordinate all activities associated with completing the request with IT to provide the assessment and cost estimates inclusive of hardware, storage requirements and maintenance to the requestor. IT will assist with securing and surveying network access.

e. If the request is security related, purchase, installation, and maintenance of camera equipment proposals approved by the appropriate vice president, dean or designee shall be submitted to the Chief of Police or designee in writing for final approval to ensure the proposal complies with this policy.

f. Once approved, new surveillance cameras must connect to the University’s centralized surveillance system and must fulfill current University standards for the equipment and equipment maintenance.

g. VCUPD and IT are responsible for advising departments on appropriate applications of surveillance technologies and for providing technical assistance to departments preparing proposals for the purchase of security camera systems.

h. The installation of “dummy” cameras that do not operate is prohibited.

i. Installers must restore the fire protection rating of any exterior wall that is
3. **Placement of Cameras**
   
a. Camera Assessments will be completed by the VCUPD as requested to identify threats, security vulnerabilities, probability of occurrence, or impact of an event and security risk.

b. Security cameras will not be used in areas where there is a reasonable expectation of privacy including, but not limited to, restrooms, private student residence hall rooms, medical patient rooms, and locker rooms.

c. VCUPD will limit camera positions and views of residential housing. Any camera views positioned proximate to VCU housing facilities will be no greater than what is available with unaided vision. Furthermore the views of a residential housing facility must not violate the legal standard of “reasonable expectations of privacy.”

d. Unless being used for criminal investigations, all video camera installations should be visible.

e. All Public Notifications that reference camera installation will be maintained and disseminated if necessary at the discretion of VCUPD. The notification includes placement of cameras, viewing capabilities and technology utilized.

f. Captured Audio from cameras can be requested by VCUPD and may be approved based on current technology of the equipment, cost and/or feasibility.

4. **Access and Monitoring**
   
a. Not all university security cameras are monitored continuously under normal operating conditions but may be monitored by the VCUPD for legitimate safety and security purposes that include, but are not limited to, high risk areas, or restricted access areas/locations, in response to an alarm, special events, and specific investigations.

b. For property protection and personal safety cameras, access to live video or recorded video from cameras shall be limited to authorized personnel appointed by the department and trained/approved by VCUPD.

c. VCUPD Investigations Division will review all requests regarding the release or review of recorded video images obtained through security system monitoring. No release or review of recorded video images will occur without the authorization by the Investigations Division or designee along with the Chief of Police. Release or withholding of such records shall be in accordance with the law and with appropriate consultation with University Counsel.

5. **Appropriate Use and Confidentiality**
   
a. 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. Camera control operators will monitor cameras based on suspicious behavior, not individual characteristics, unless individual characteristics have been reported in the context of a criminal investigation and are relevant to such situations.
6. Training
   
   a. Camera system operators will be trained annually in the technological, legal and ethical parameters of appropriate camera use.
   
   b. Camera system operators shall receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.

7. Storage, Retention, Disposal of Recordings and Maintenance
   
   a. Storage, Retention and Disposal of recordings will follow the regulations of the Virginia Public Records Act 42.1-76 et seq. of the Code of Virginia.
   
   b. Recorded video will be stored for a period of no less than seven (7) days, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Chief of Police or designee. Because of the various types of CCTV technology, storage times will vary.
   
   c. Video recorded images will be tracked and stored in a secure location with access by authorized personnel only.
   
   d. The VCUPD Emergency Communications Center and other monitoring centers will be configured to prevent camera operators from tampering with recorded video information.
   
   e. VCUPD and IT will be responsible for the coordination of resolving maintenance issues with installed cameras.

8. Exemptions
   
   a. Security cameras installed by authorized financial institutions to monitor bank branch locations and ATM machines.
   
   b. Recordings from cameras whose primary function is not security, such as public performances or events, interviews, research, or other use for broadcast or educational purposes. Examples of such excluded activities would include videotaping of classroom lecture, athletic events for post-game review, videotaping of concerts, plays, and experiments, or videotaped interviews.
   
   c. Webcams used for general use by the university.
   
   d. Lawful individual use of cameras.
Forms

1. Camera Monitoring Request Form to be emailed to cpcamrequest@vcu.edu:
   https://police.vcu.edu/media/police/assets/documents/CameraAccessRequestForm.pdf

Related Documents

VCU Camera Approval Process Flow Chart: https://police.vcu.edu/services/campus-camera-system/

Revision History

None – New Policy

FAQs

1. Is there an easier way to help me determine what type of camera request I need to make?

Yes, the flow chart below should assist with this.

- Requestor must determine if the request is security or research related.
- Based on the request type, VCU University Council’s Office may be consulted to address privacy concerns.
- VCUPD and IT are responsible for advising departments on appropriate applications of surveillance technologies and for providing technical assistance to departments preparing proposals for the purchase of security camera systems.
- If retention over 7 days is required by a department, the original request must indicate the same.
- Once approved, new surveillance cameras must connect to the University’s centralized surveillance system and must fulfill current University standards for the equipment and maintenance.
- If not approved, the request will be returned to the person that requested the installation.