

CLOSED CIRCUIT TELEVISION MONITORING AND RECORDING OF PUBLIC AREAS FOR SAFETY AND SECURITY PURPOSES

I. Purpose

The purpose of this policy is to regulate the use of closed circuit television (CCTV) cameras to monitor and record public areas for the purposes of safety and security.

II. Scope

This policy applies to all personnel, UPHS, schools and centers of the University, in the use of CCTV monitoring and recording. Legitimate uses of this technology related to research are covered by University policies governing research with human subjects and, therefore, excluded from this policy.

III. General Principles

1. The Division of Public Safety is committed to enhancing the quality of life of the campus community by integrating the best practices of public and private policing with state-of-the-art technology. A critical component of a comprehensive security plan using state-of-the-art technology is closed circuit television (CCTV).
2. The purpose of CCTV monitoring of public areas by security personnel is to deter crime and to assist the Penn Police in protecting the safety and property of the University community. Any diversion of security technologies and personnel for other purposes (e.g., CCTV monitoring of political or religious activities, or employee and/or student evaluations) would undermine the acceptability of these resources for critical safety goals and is therefore prohibited by this policy.
3. Video monitoring for security purposes will be conducted in a professional, ethical and legal manner. Personnel involved in video monitoring will be appropriately trained and continuously supervised in the responsible use of this technology. Violations of the Code of Procedures for video monitoring referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of the University.
4. Information obtained through video monitoring will be used exclusively for security and law enforcement purposes. Information obtained through video monitoring will only be released when authorized by the Vice President of Public Safety according to the procedures established in this policy.
5. Video monitoring of public areas for security purposes will be conducted in a manner consistent with all existing University policies, including the Non-Discrimination Policy, the Sexual Harassment Policy, Open Expression Guidelines and other relevant policies. The code of practice for video monitoring prohibits monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.)

6. Video monitoring of public areas for security purposes at the University is limited to uses that do not violate the reasonable expectation to privacy as defined by law.
7. To maintain an informed University community, the Division of Public Safety will periodically disseminate written materials describing the purpose and location of CCTV monitoring and the guidelines for its use. The location of outdoor CCTV cameras monitored by the Division of Public safety will be published in Almanac.
8. Information obtained in violation of this policy may not be used in a disciplinary proceeding against a member of the University faculty, staff or student body.
9. All existing uses of video monitoring and recording must comply with this policy.

IV. Responsibilities

1. The Division of Public Safety is the department authorized to oversee and coordinate the use of CCTV monitoring for safety and security purposes at the University. All University areas using CCTV monitoring are responsible for implementing this policy in their respective operations. Public Safety has primary responsibility for disseminating the policy and assisting other units in implementing the policy and procedures.
2. The Vice President of Public Safety has the responsibility to authorize all CCTV monitoring for safety and security purposes at the University. All new installations will follow the Division of Public Safety operating principles. All existing CCTV monitoring systems will be evaluated for compliance with this policy.
3. The Division of Public Safety will monitor new developments in the relevant law and in security industry practices to ensure that CCTV monitoring at the University is consistent with the highest standards and protections.
4. A CCTV Monitoring Committee will be established to assure that the Division of Public Safety adheres to established policy and procedure in the use of CCTV and to review camera locations and request for release of recorded video images.
 - a. The CCTV Monitoring Committee will consist of seven members who will serve for a term of one year.

The Chairperson of the University Council's Committee on Campus & Community Life or his/her designee will serve as chair.
 Two faculty members appointed by the Chair of the Faculty Senate
 One member appointed by the President
 One student member
 One staff member
 Representative of the Office of Audit & Compliance & Privacy

An individual may appeal an adverse decision by the CCTV Monitoring Committee through existing University appeal mechanisms such as the Committee on Open Expression or the University Ombudsman.

- a. The CCTV Monitoring Committee will review camera locations to ensure the perimeter of view of public cameras conforms to this policy.

The proposed location of permanent CCTV cameras will be provided to the CCTV Monitoring Committee for review and published in the Almanac before installation. A list of all

University-owned or controlled camera locations will be published semi-annually in Almanac and made available by the Division of Public Safety to anyone requesting the list.

The locations of temporary cameras to be used for special events will be reviewed by the CCTV Monitoring Committee for approval and published in Almanac before the event if possible.

(Note: "Temporary cameras" does not include mobile video equipment or hidden surveillance cameras used for criminal investigations.)

Included with the list of CCTV camera locations will be a general description of the technology employed and the capabilities of the cameras.

Students and staff entering certain sensitive locations on campus may have an increased concern for privacy or confidentiality. In order to prevent a possible chilling effect on the use of service at these locations, concerned persons may petition the CCTV Monitoring Committee to forgo the installation of a proposed camera or for the removal of an existing camera. The CCTV Monitoring Committee will determine the appropriateness of an installation weighing the concerns of the person(s) making the requests and the safety and security of the entire community.

In recognizing students may also have an enhanced expectation of privacy in the hallways and lounges of residence facilities, CCTV monitoring for safety and security purposes will not be used in residential hallways and lounges unless the Vice President of Public Safety determines a specific safety/security risk exists.

The CCTV Monitoring Committee will review complaints regarding camera locations and determine whether the CCTV Monitoring Policy is being followed. The panel should weigh whether the potential increment in community security outweighs any likely infringement of individual privacy.

- c. The CCTV Monitoring Committee, with the Vice President of Public Safety, will review all requests received by the Division of Public Safety to release recorded video images obtained through CCTV monitoring. No releases of recorded video images will occur without authorization by the Vice President and the CCTV Monitoring Committee. Excluded from review by the CCTV Monitoring Committee are releases of recorded video images directly related to a criminal investigation, arrest or subpoena. The CCTV Monitoring Committee may also approve release of recorded video images only for legitimate purposes, such as to protect the University and its members from harm or liability. Five affirmative votes are necessary to approve the release of recorded video images. Any release of recorded video images will be recorded on a written log.
- d. Any member of the CCTV Monitoring Committee may audit the Division of Public Safety's CCTV monitoring operations, including video storage, at any time without prior notice.
- e. The Chair of University Council's Committee on Campus & Community Life will report to the CCTV Monitoring Committee

at least once a year describing all requests for camera locations and release of recorded video images and disposition of those requests.

- f. The CCTV Monitoring Committee will review this policy annually and recommend revisions if needed.

V. Procedures

1. All operators and supervisors involved in video monitoring of public areas will perform their duties in accordance with the Code of Practice consistent with this policy developed by the Division of Public Safety.
2. Division of Public Safety Management will assure that responsible and proper camera monitoring practices by control operators is continuous.
3. The Division of Public Safety has posted signage at appropriate locations. Signage states: "This area is subject to Video Monitoring by the University of Pennsylvania Police Department."
4. The Division of Public Safety will limit camera positions and views of residential housing. Any view given to the housing will be no greater than what is available with unaided vision. Furthermore, the view of a residential housing facility must not violate the standard of "reasonable expectation of privacy."
5. The Division of Public Safety Central Monitoring Center and other central monitoring centers will be configured to prevent camera operators tampering with or duplicating recorded video information.
6. Recorded video will be stored for a period not to exceed 30 days and will then be erased, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Vice President of Public Safety and the CCTV Monitoring Committee.
7. Recorded video images will be stored in a secure location with access by authorized personnel only.
8. Camera control operators will conduct video observation of areas only in plain view of others situated in the public area viewable to the public.
9. Camera control operators will be trained in the technical, legal and ethical parameters of appropriate camera use.
 - a. Camera control operators will receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.
 - b. Camera control operators will receive training in cultural awareness.
10. Camera control operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the University's Non-Discrimination Policy. Camera control operators will monitor based on suspicious behavior, not individual characteristics.
11. Camera control operators will not spot and continuously view people becoming intimate in public areas.
12. Camera control operators will not view private rooms or areas through windows.
13. Mobile video equipment may be used in criminal investigations. Mobile video equipment will only be used in non-criminal investigations in specific instances creating significant risk to public safety, security, and property as authorized in writing by the President to the Division of Public Safety and the Open Expression Committee. Portable hidden cameras with recording equipment will only be used for criminal investigation by the University Police Detective Unit with the approval of the Vice President of Public Safety.

Examples of Video Monitoring and Recording of Public Areas

Legitimate safety and security purposes include, but are not limited to the following;

- Protection of buildings and property
- Building perimeter, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, cashier locations, etc.
- Monitoring of Access Control Systems
- Monitor and record restricted access transactions at entrances to buildings and other areas.
- Verification of security alarms
- Intrusion alarms, exit door controls, hold-up alarms
- Video Patrol of Public Areas
- Transit Stops, parking lots, public streets (enclosed and unenclosed), shopping areas and vehicle intersections, etc.
- Criminal Investigation
- Robbery, burglary, and theft surveillance
- Protection of pedestrians
- Monitoring of pedestrian and vehicle traffic activity