

Safety and Security Camera Acceptable Use Policy

No. 5617

1.0 Purpose

Policy Effective Date: 3/1/2010

Last Revision Date: 6/20/2024

Policy Owner:

Mike Mulhare, Associate Vice President for Public Safety

Policy Author

(Contact Person): Mac Babb, Chief, Virginia Tech Police

Affected

Parties: Undergraduate Graduate Faculty Staff

1.0 Purpose 2.0 Policy 3.0 Procedures 4.0 Definitions 5.0 References 6.0 Approval and Revisions Virginia Tech 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 Virginia Tech community. This policy addresses the university's safety and security needs while respecting and preserving individual privacy.

To ensure the protection of individual privacy rights in accordance with the university's core values 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.

2.0 Policy

The Virginia Tech Police Department (VTPD) 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 all costs associated with the equipment and for implementing and complying with this policy in their respective operations.

All existing uses of security camera systems will be required to comply with the policy. The university Surveillance Oversight Committee is an operational committee established by the Associate Vice President for Public Safety to oversee implementation of this policy. Proposed policy revisions will be reviewed by the Surveillance Oversight Committee.

2.1 Responsibilities

VTPD, in conjunction with Network Infrastructure & Technology (NI&S) and Virginia Tech Emergency Management (VTEM), is responsible for implementation of the policy.

NI&S and the VTPD are responsible for advising departments on appropriate applications of surveillance technologies and for providing technical assistance to departments preparing proposals for the purchase and installation of security camera systems.

VTPD and NI&S 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.

VTPD and NI&S will review proposals and recommendations for camera installations and review specific camera locations to determine that the perimeter of view of fixed location cameras conforms to this policy. Proposals for the installation of surveillance cameras shall be reviewed by the Chief of Police or designee. Recommendations shall be forwarded to the Surveillance Oversight Committee.



VTPD and VTEM will assess new camera locations and will conduct an evaluation of existing camera locations and incidents as necessary.

Regular maintenance and testing will be performed by NI&S, in collaboration with the approved security camera integrator. Departments utilizing the camera system are responsible for the replacement of their cameras when they reach the end of life.

VTPD will review any complaints regarding the utilization of surveillance camera systems and determine whether this policy is being followed. Appeals of a decision made by the Chief of Police will be made to and reviewed by the Surveillance Oversight Committee which will make a recommendation to the Associate Vice President for Public Safety, who will render a decision. An appeal of the Associate Vice President for Public Safety's decision may be taken to the Executive Vice President and Chief Operating Officer who is the final arbiter.

2.1.1 Responsibilities of Surveillance Oversight Committee

The Surveillance Oversight Committee will be responsible for the review and approval of all proposals for security camera equipment recommended by the Chief of Police. The Surveillance Oversight Committee shall be responsible for the review and approval of any requested exceptions to this policy. The Surveillance Oversight Committee shall propose to the Associate Vice President for Public Safety appropriate changes to this policy as needed.

The Surveillance Oversight Committee shall be comprised of five members:

- The Chief of Police or designee, Chair
- Chief Information Officer or designee
- Vice President for Student Affairs or designee
- Vice President for Campus Planning, Infrastructure and Facilities or designee
- Executive Director of Emergency Management or designee

2.1.2 Responsibilities for Review of External Requests for Records Release

The VTPD will review all external requests to release records obtained through security camera surveillance. The VTPD will seek consultation and advice from University Legal Counsel and other departments as deemed appropriate related to these requests prior to the release of any records.

2.2 Scope

This policy applies to all personnel, departments, and colleges of Virginia Tech in the use of security cameras and their video monitoring and recording systems. Although the physical cameras may be identical, the functions of these cameras fall into three main categories:

- A. **Property Protection:** The primary intent is to capture video and store it on a remote device so that if property is reported stolen or damaged, the video may lead to the identification of the perpetrator. Examples: an unstaffed computer lab, an unstaffed science lab, or a parking lot.
- B. **Personal Safety:** The primary intent is to capture video and store it on a remote device so that if a person is assaulted, the video may lead to the identification of the perpetrator. Examples: a public walkway, or a parking lot.
- C. Extended Responsibility: The primary intent is to have the live video stream in one area monitored by a staff member in close proximity. In this case, video may or may not be recorded. Example: a computer lab with multiple rooms and only one staff member.



2.3 General Principles

Information obtained from university surveillance cameras shall be used for safety and security purposes and for law and policy enforcement, including, where appropriate, student judicial functions. Information must be handled with an appropriate level of security to protect against unauthorized access, alteration, or disclosure in accordance with <u>Policy 7105</u>, <u>Policy for Protecting University Information in Digital Form</u>.

All appropriate measures must be taken to protect an individual's right to privacy and hold university information securely through its creation, storage, transmission, use, and deletion.

All camera installations are subject to federal and state laws.

Departments requesting security cameras will be required to follow the procedures outlined in this policy.

2.3.1 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 and their use would not violate the reasonable expectation of privacy. Where appropriate, the cameras may be placed campus-wide, inside and outside buildings.

Cameras may be installed in restricted access sites such as a departmental computer lab; however, these locations are not places where a person has a reasonable expectation of privacy.

Approval from the VTPD must be obtained prior to any relocation of existing cameras.

No audio shall be recorded except in areas where no one is routinely permitted. Requests to utilize audio surveillance that does not comply with this requirement will be evaluated on a case-by-case basis by the Surveillance Oversight Committee.

Camera positions and views of residential housing shall be limited. The view of a residential housing facility must not violate the standard of a reasonable expectation of privacy.

Unless the camera is being used for criminal investigations, monitoring by security cameras in the following locations is generally prohibited:

- Rooms within the residence halls
- Bathrooms
- Locker rooms
- Interior office spaces other than cameras utilized to monitor access and waiting areas
- Interior of classrooms not used as a lab

The installation of "dummy" cameras that do not operate is prohibited.

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

Owners of cameras that are no longer in use will be responsible for removal from the location and notification of Network Infrastructure and Services.

2.3.2 Access and Monitoring

All recording or monitoring of activities of individuals or groups by university security cameras will be conducted in a manner consistent with university policies, state and federal laws, and will not be based on the subjects' personal characteristics, including age, color, disability, gender, national origin, race, religion, sexual orientation, or other protected characteristics. Furthermore, all recording or monitoring will be conducted in a professional, ethical, and legal manner. All personnel with access to university security cameras should be trained in the effective, legal, and ethical use of monitoring equipment.



University security cameras are not monitored continuously under normal operating conditions but may be monitored for legitimate safety and security purposes that include, but are not limited to, the following: high risk areas, restricted access areas/locations, in response to an alarm, special events, and specific investigations authorized by the Chief of Police or designee.

For **Property Protection** and **Personal Safety** cameras, access to live video or recorded video from cameras shall be limited to authorized personnel of the department which installed the cameras, the Police Department and other persons authorized by the Chief of Police or designee. The copying, duplicating and/or retransmission of live or recorded video shall be limited to persons authorized by the Chief of Police or designee.

A record log will be kept of all instances of access to, and use of, recorded material. Nothing in this section is intended to limit the authority of the Virginia Tech Police Department (VTPD) in law enforcement activities.

2.3.3 Appropriate Use and Confidentiality

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. Personnel are expected to know and follow university <u>Policy 7000</u>, <u>Acceptable Use and Administration of Computer and</u> <u>Communication Systems</u> and the Acceptable Use of Information Systems at Virginia Tech (<u>http://www.vt.edu/about/acceptable-use</u>).

2.3.4 Division of Public Safety and Parking and Transportation Services

Mobile, body worn, covert video equipment and license plate reader (LPR) technology may be used in daily operations by the VTPD and Parking and Transportation Services and temporary installations (less than 10 days) of cameras by the Division of Public Safety in the interest of public safety (e.g., traffic, crowd management) are not subject to this policy. Video equipment may also be used for non-criminal investigations of specific instances which may be a risk to public safety, security and property as authorized by the Chief of Police or designee.

Equipment users must still conform to requirements on appropriate use of camera equipment, storage of data, and confidentiality.

2.3.5 Exceptions

This policy does not apply to cameras used for academic purposes. Cameras that are used for research would be governed by other policies involving human subjects and are, therefore, excluded from this policy.

This policy does not address the use of Webcams for general use by the university (e.g., on the official Virginia Tech website). This policy also does not apply to the use of video equipment for the recording of public performances or events, interviews, or other use for broadcast or educational purposes. Examples of such excluded activities would include videotaping of athletic events for post-game review, videotaping of concerts, plays, and lectures, or videotaped interviews of persons. Automated teller machines (ATMs), which may utilize cameras, are exempt from this policy.

3.0 Procedures

Departments requesting security cameras will be required to follow the procedures outlined in this policy.

3.1 Installation

Individual colleges, departments, programs, or campus organizations installing video surveillance equipment shall submit a written request to their appropriate dean or vice president describing the proposed location of surveillance



devices, justifying the proposed installation, and identifying the funding source or sources for purchase and ongoing maintenance.

- The Chief of Police or designee will review all proposals from deans and vice presidents. Upon completion of review of the project, the Chief of Police will forward the proposal to the SOC with a recommendation.
- The SOC will be responsible for reviewing and approving or denying all proposals for security camera equipment recommended by the Chief of Police.

Camera installations associated with capital and large-scale renovation projects will be coordinated between NI&S, VTPD, IT and Construction, Planning, Infrastructure and Facilities (CPIF) and do not require review by the Surveillance Oversight Committee.

Network Infrastructure and Services (NI&S) shall oversee the installation of all approved security camera systems with the assistance of the VTPD, the Division of Information Technology, and Facilities, as required.

Purchasing (HokieMart) will not accept, approve, or process any order for security camera systems without the approval of the Surveillance Oversight Committee.

3.2 Training

Camera control operators shall be trained in the technical, legal, and ethical parameters of appropriate camera use.

Camera control operators shall receive a copy of this policy and provide written acknowledgement that they have read and understood its contents.

3.3 Operation

Video surveillance will be conducted in a manner consistent with all existing university policies.

Camera control operators shall monitor based on suspicious behavior, not individual characteristics.

Camera control operators shall not view private rooms or areas through windows.

All operators and supervisors involved in video surveillance will perform their duties in accordance with this policy.

3.4 Storage and Retention of Recordings

No attempt shall be made to alter any part of any surveillance recording. Surveillance centers and monitors will be configured to prevent camera operators from tampering with or duplicating recorded information.

Surveillance records shall not be stored by individual departments. All surveillance records shall be stored in a secure university centralized location for a period of 15 days and will then promptly be erased or written over, 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. Individual departments shall not store video surveillance recordings.

A log shall be maintained of all instances of access to or use of surveillance records. The log shall include the date and identification of the person or persons to whom access was granted.

4.0 Definitions



5.0 References

University Policy 7000, Acceptable Use and Administration of Computer and Communication Systems <u>http://www.policies.vt.edu/7000.pdf</u>

University Policy 7105, Policy for Protecting University Information in Digital Form http://www.policies.vt.edu/7105.pdf

6.0 Approval and Revisions

Approved March 1, 2010 by Vice President for Administrative Services, Sherwood G. Wilson.

- Revision 1
 - Section 2 addition of wording "by January 2013" and deletion of "within 12 months of the approval of this policy."
 - Section 2.3.1 change "surveillance" to "investigations."
 - Technical corrections, updates and insertion of hyperlinks.

Approved March 14, 2011 by Vice President for Administrative Services, Sherwood G. Wilson.

- Revision 2
 - Section 2 removal of "shall be brought into compliance with this policy January 2013" and addition of "will be required to comply with the policy at a future date. A notification of the compliance date will be made 12 months in advance."
 - Section 2.3 added "safety and security purposes" to the list of purposes for camera use
 - Section 2.3.2 modified list of individuals who may access live or recorded video for personal protection and personal safety cameras, and added "The copying, duplicating and/or retransmission of live or recorded video shall be limited to persons authorized by the Chief of Police or designee."
 - Section 3.1 removed requirement to provide cost estimate
 - Section 3.4 changed 30 day storage period to 15 days
 - Technical corrections to titles of individuals and departments
 - Added option for individuals to appoint a designee for specific responsibilities

Approved April 17, 2012 by the University Safety and Security Policy Committee. Approved April 17, 2012 by President Charles W. Steger upon recommendation of the University Safety and Security Policy Committee.

- Revision 3
 - Updated membership of the SOC by removing representative from Business Services, due to change in responsibilities.
 - Updated titles and department names.

Approved March 14, 2017 by the University Safety and Security Policy Committee. Approved March 14, 2017 by President Timothy D. Sands upon recommendation of the University Safety and Security Policy Committee.

- Revision 4
 - Updated titles, appointing authority, and membership of the SOC to reflect organizational changes.
 - Technical changes recommended November 1, 2019 by Kevin Foust, Associate Vice President for Safety and Security

Approved November 1, 2019 by Vice President for Policy and Governance, Kim O'Rourke.



- Revision 5
 - Section 2.1 updated to reflect Network Infrastructure and Technology responsibility.
 - Section 2.3.1 revised to include Virginia Tech Police Department approval requirement.
 - Section 2.3.4 revised to include additional types of camera equipment and license plate reader technology, and requirements for appropriate use and storage of data.
 - Updated titles to reflect organizational changes.
 - Technical changes throughout.

Approved June 20, 2024 by Associate Vice President for Public Safety, Michael Mulhare.