Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes

Effective Date: June 2008  
Revision: May 2012  
Responsible Officer: Senior Associate Vice President for Public Safety

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, schools and centers of the University in the use of CCTV monitoring and recording.

III. General Principles
A. The Department 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).

B. The purpose of CCTV monitoring of public areas by public safety personnel is to deter crime and to assist the Drexel police in providing safety and protecting the 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.

C. 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 Procedures for video monitoring referenced in this policy will result in disciplinary action consistent with the rules and regulations governing employees of the University.

D. Information obtained through video monitoring will be used exclusively for safety, security and law enforcement purposes. Information obtained through video monitoring will only be released when authorized by the Senior Associate Vice President (SAVP) for Public Safety according to the procedures established in this policy.

E. Video monitoring of public areas for safety and security purposes will be conducted in a manner consistent with all existing University policies. The code of practice for video monitoring prohibits monitoring based on the characteristics and classifications of race, religion, gender, age, sexual orientation, national origin, disability, etc.

F. 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.
IV. Responsibilities

A. The Department of Public Safety is solely 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.

B. The SAVP for Public Safety has the responsibility to authorize all CCTV monitoring for safety and security purposes at the University. All CCTV installations will follow the Department of Public Safety operating principles.

C. The Department of Public Safety (DPS) 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.

D. The SAVP for Public Safety will review all requests regarding the release or review of recorded video images obtained through CCTV monitoring. No release or review of recorded video images will occur without authorization by the SAVP for Public Safety or designee and the University Office of General Counsel. The SAVP for Public Safety and the University Office of General Counsel may also approve the release or review of recorded video images for legitimate purposes, such as to protect the University and its members from harm or liability. Exceptions: recorded video images directly related to a criminal investigation, arrest or subpoena.

E. The SAVP for Public Safety shall make the determination regarding the placement of CCTV cameras that are applicable to the provisions of this policy. Determining locations for cameras shall be based upon factors such as areas with increased pedestrian traffic, traffic problems, law enforcement and security best practices and, based upon analysis of available crime and other relevant data, areas that would benefit from increased observation by DPS personnel.

F. The maintenance and testing of DPS CCTV cameras shall be the responsibility of the Director of Public Safety Operations. Observation and testing of CCTV camera function shall be done on an ongoing basis by Public Safety Operations staff. Malfunctioning or damaged equipment shall be repaired or replaced as quickly as possible following the notification of the existing problem. Maintenance of CCTV cameras shall be completed as needed but at a minimum annually.

G. Annually, based on crime incident analysis and other relevant data, the SAVP for Public Safety will evaluate existing locations of campus CCTV cameras. Based upon this assessment, cameras may be repositioned or added and those deemed no longer necessary will be removed.

V. Procedures

A. All public safety personnel involved in video monitoring of public areas will perform their duties consistent with this policy.

B. Department of Public Safety Management will assure that responsible and proper camera monitoring practices by control operators is continuous.

C. The Department of Public Safety will post signage at appropriate locations. Signage will state,

   THIS AREA IS SUBJECT TO VIDEO MONITORING

   BY THE DREXEL UNIVERSITY POLICE DEPARTMENT

D. The Department 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 legal standard of “reasonable expectation of privacy.”

E. The Department of Public Safety Communications Center and other monitoring centers will be configured to prevent camera operators from tampering with or duplicating recorded video information.

F. 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 Senior Associate Vice President of Public Safety and the University Office of General Counsel. Because of the various types of CCTV technology, storage times will vary.

G. Video recorded images will be stored in a secure location with access by authorized personnel only.

H. Camera control operators will conduct video observation of areas only in plain view of others situated in the public area viewable to the public.

I. 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.

J. Camera control operators will NOT monitor individuals based on characteristics of race, religion, gender, age, sexual orientation, national origin, disability or other classifications protected by University Policy. Camera control operators will monitor based on suspicious behavior, not individual characteristics.

K. Camera control operators will NOT spot and continuously view people becoming intimate in public areas.

L. Camera control operators will NOT view private rooms or areas through windows.

M. Mobile video equipment and hidden surveillance cameras 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 by the Senior Associate Vice President for Public Safety. Portable hidden cameras and recording equipment will only be used for criminal investigation by the Drexel University Department of Public Safety with the approval of the Senior Associate Vice President for 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