

Policy on Closed Circuit Television (CCTV) **Monitoring and Recording**

Washington University is committed to providing a safe environment by integrating the best practices of policing with state of the art technology. A critical component of a comprehensive security plan is Closed Circuit Television (CCTV) – a technology that can remotely monitor and record activity on campus.

The purpose of this Policy is to provide guidelines for the use of CCTV on the University property in a way that enhances security, but also respects the expectation of reasonable privacy among members of the community. This Policy applies to all students, faculty, staff, Schools and Departments within the University community.¹

I. General Principles

A. The purpose of CCTV monitoring is to deter crime and to protect the safety and property of the University Community. Safety and security purposes include, but are not limited to:

- Protection of individuals, including students, faculty, staff and visitors;
- Protection of University owned and/or operated property and buildings, including building perimeters, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, and cashier locations;
- Verification of alarms and access control systems;
- Patrol of common areas and areas accessible to the public, including transit stops, parking lots, public streets and pedestrian walks; and
- Investigation of criminal activity and serious disciplinary activity such as, for example, sabotage of research projects, in accordance with this Policy.

Any diversion of security technologies for purposes other than the safety and security purposes contemplated by this Policy is prohibited.

B. CCTV monitoring will be conducted in a professional, ethical and legal manner. Personnel involved in monitoring will be appropriately trained and supervised in the responsible use of this technology. Violations of the Code of Procedures set forth under Section III below may result in disciplinary action consistent with the rules and regulations governing employees of the University.

C. Information obtained through monitoring will only be released when approved by the Chief of Police of the Washington University Police Department (WUPD), the Director of Protective Services of the Washington University School of Medicine (WUSM), and the Executive Vice Chancellor for Administration, or any of their designees according to procedures established in this Policy.

¹ Uses of CCTV technology covered by University policies governing research with human subjects or animal subjects are excluded from this Policy.

- D. Monitoring will be conducted in a manner consistent with all existing University policies, including the Non-Discrimination Policy, the Sexual Harassment Policy, and other relevant policies. Monitoring based on the characteristics and classifications contained in the Non-Discrimination Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.) is strictly prohibited.
- E. Monitoring shall be limited to uses that do not violate the reasonable expectation to privacy. Students have a greater expectation of privacy in their personal residential rooms/suites and in the hallways and lounges of residential facilities. Therefore, monitoring for safety and security purposes will not be used in residential hallways and lounges unless the Chief of Police, in consultation with the Director of Residential Life, determines that a specific safety/security risk exists. Monitoring of residential rooms shared by more than one resident or suite common areas is not permitted under this Policy without authorization from all residents of the subject suite or room.
- F. The existence of this Policy does not imply or guarantee that cameras will be constantly monitored in real time.
- G. The CCTV Committee shall periodically review the Policy and make recommendations for revisions, if any, to the Executive Vice Chancellor of Administration. The University administration may amend this Policy at anytime provided that notice is given to the University community by the posting of a revised Policy on the University website.

II. Responsibilities

- A. The WUPD and WUSM Protective Services in consultation with the Executive Vice Chancellor for Administration are authorized to oversee 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, including the Code of Procedures, in their respective Departments.
- B. The Executive Vice Chancellor for Administration has the responsibility to authorize all long-term CCTV monitoring recommended by the CCTV Committee. The Chief of Police and the Director of Protective Services have the responsibility to authorize any temporary installation as deemed necessary in connection with a criminal investigation, for enhanced security for special events or as otherwise deemed necessary to protect the safety and security of the University.
- C. A CCTV Committee will be appointed by the Chancellor. The CCTV Committee will be made up of at least eight (8) members who will serve for a period designated by the Chancellor. The CCTV Committee shall include the WUPD Chief of Police (or designee); the Director of Protective Services (or designee); one representative from the Student Union; one representative from the Graduate Professional Student Council; at

least one representative each from Human Resources and Network Technology Services; and at least two (2) faculty members. The CCTV Committee will elect a Chair.

The CCTV Committee shall have responsibilities as described in this Policy and such other responsibilities that may be assigned from time to time by the Chancellor or the Executive Vice Chancellor for Administration. The Chair of the CCTV Committee may elect to convene a meeting of CCTV Committee members for CCTV Committee action required under this Policy. In lieu of a meeting, the Chair may choose to consult with members by phone or internet. All members should be given the opportunity to participate in such consultation. Any CCTV recommendation under this Policy must include the input of the majority of CCTV Committee members. The Committee is also strongly encouraged to seek input from administrators, faculty, staff and students in areas affected by the use/proposed use of CCTV and to consider such input before making a final recommendation.

D. All new Department installations will follow this Policy. Departments wishing to install monitoring systems should petition the CCTV Committee. The written petition should include the following information:

- a description of the safety or security issue warranting the installation of CCTV monitoring systems;
- the number and proposed location of camera(s) to be installed;
- whether the location of cameras involve the recording of activity by students, faculty, staff or the general public and to what extent;
- the names and titles of the individuals who will be responsible for monitoring the cameras;
- the frequency by which the recordings will be reviewed (i.e. real time, daily, randomly, when an alarm is sounded);
- the length of time recordings will be stored; and
- the location where recordings will be stored.

The CCTV Committee will consider the petition and make a recommendation as to approval of the installation to the Executive Vice Chancellor for Administration. The Committee's recommendation can propose an installation that is less or more extensive than described in the original Department petition. The Executive Vice Chancellor for Administration will make the final decision regarding the appropriateness of an installation weighing the concerns of the Department making the requests and safety and security of the entire community and the privacy interests of those whose activity may be recorded.

E. Not all new installations of CCTV must be reviewed by the CCTV oversight committee. Installations in the types of locations or for needs similar to those approved in the past by the Committee and Executive Vice Chancellor for Administration may proceed if the Chief of Police, Director of Protective Services and the Chair of the CCTV committee (acting on behalf of the Committee) approve. Typical installations falling within this guideline for all university owned or operated property would include property perimeter areas, walkways, exit and entrance points for buildings, parking facilities, campus streets

and laundry facilities. Other examples include rooms or areas that house critical equipment, sensitive research, items of high or irreplaceable value, or where there is high risk of property or personal safety crimes.

- F. Students, faculty 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 at these locations, concerned persons may petition the CCTV Committee to forgo the installation of a proposed camera or for the removal of an existing camera. The petition should identify the location/proposed location of the subject cameras and should detail the basis for the request for removal. The CCTV Committee will consider the petition and make a recommendation to the Executive Vice Chancellor for Administration. The Executive Vice Chancellor for Administration will make the final decision regarding the appropriateness of foregoing to install/removing camera(s), weighing the concerns of the person(s) making the requests and the safety and security of the entire community.
- G. The Chief of Police and the Director of Protective Services, in consultation with the Office of General Counsel, will review and respond to subpoenas from outside law enforcement to release recordings obtained through CCTV monitoring. Requests for CCTV recordings made in connection with internal investigations of University disciplinary matters will be forwarded to the CCTV Committee. The CCTV Committee will review such requests and make recommendations to the Executive Vice Chancellor for Administration. The Executive Vice Chancellor for Administration, in consultation with the Vice Chancellor for Students and/or other University administrators, will make the final decision regarding the appropriateness of releasing the recordings, weighing the concerns of the disciplinary official/committee making the request against privacy interests and safety and security of the entire community.
- H. Any appeal of a decision by the Chief of Police or the Director of Protective Services will be reviewed by the Executive Vice Chancellor for Administration who will render a decision. An appeal may be taken to the Chancellor to review the decision rendered by the Executive Vice Chancellor for Administration; the Chancellor's decision is final.
- I. The CCTV Committee may audit any Department's CCTV surveillance operations, including recording storage and retention.

III Code of Procedures

- A. All operators and supervisors involved in video surveillance will perform their duties in accordance with this Policy.
- B. The WUPD and WUSM Protective Services will limit camera positions and view of residential housing in compliance with the Policy.

- C. Surveillance centers will be configured to prevent camera operators tampering with or duplicating recorded information.
- D. Recordings may be retained for a period not to exceed 45 days and will then be erased, unless retained as part of a criminal investigation or court proceeding (either civil or criminal), or other bona fide use as approved by the Chief of Police or the Director of Protective Services.
- E. Recordings will be retained in a secure location with access by authorized personnel only.
- F. Camera control operators who view recordings must do so in the presence of a supervisor to maintain the integrity of the recording.
- G. Camera control operators will be trained in the technical, legal and ethical parameters of appropriate camera use. Camera control operators will receive a copy of this Policy and provide written acknowledgement that they have read and understood its contents.
- H. Camera control operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the Campus's Non-Discrimination Policy. Camera control operators will monitor based upon suspicious behavior, not individual characteristics.
- I. Camera control operators will NOT view private rooms or areas through windows.
- J. Camera control operators will not spot and continuously view people becoming intimate in public areas.
- K. Portable hidden cameras with recording equipment will only be used for criminal investigation by the approval of the Chief of Police of WUPD or the Director of Public Services for WUSM Protective Services.

Revised: February 2011