Video Security University Policy

Contents

Commentary .................................................................................................................. 2
1. Scope ....................................................................................................................... 2
2. Policy ....................................................................................................................... 3
3. Responsibility ......................................................................................................... 4
4. Placement and Installation of Video Security Cameras .......................................... 5
5. Access\(^1\) and Monitoring .................................................................................. 6
6. Review of Recordings ............................................................................................. 6
7. Operation ................................................................................................................. 7
8. Training .................................................................................................................... 7
9. Storage and Retention of Recordings ..................................................................... 8
10. References ............................................................................................................. 8

\(^1\) Access in the context of video security refers to reviewing, copying, and disseminating recorded video.
Commentary

Tufts University utilizes video security as a public safety, emergency response and crime prevention tool on its Boston, Grafton and Medford/Somerville campuses. Tufts University is committed to enhancing the quality of life of the campus community by integrating the best practices of technology use for safety and security. A critical component of a comprehensive security plan is the utilization of video security systems.²

This policy balances the use of video security to assist in protecting the safety and security of the Tufts University community with the preservation of individual privacy, freedom of expression and civil liberties. 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 video security equipment and the handling, viewing, retention, dissemination, and destruction of video security records. The purpose of this policy is to regulate the use of video security systems used to observe and record areas on campus in a manner consistent with accepted rights of privacy. Although video will be recorded, this policy does not imply or guarantee that the video security system will be monitored in real time.³

1. Scope

1.1 This policy applies to all campuses, departments and personnel of Tufts University when installing and utilizing video security systems on campus.

1.2 Video security may be installed in situations and places where the security and safety of either property or persons would be enhanced.

1.3 Where appropriate, video security may be used inside and/or outside of university facilities.

1.4 Video security is designed for the protection of people and property, where the main intent is to capture video and store it on a remote device. This function includes:

1.4.1 Deterrence: The presence of video security equipment and the likelihood of apprehension based on the use of video security can dissuade a potential perpetrator from attempting a crime.

1.4.2 Detection: Though video security images are not continuously monitored by human operators, the use of digital analytics can interpret imagery and alert human operators to abnormal conditions.

² Video security systems typically consist of strategically placed cameras from which signals are transmitted to a central location where they are recorded and/or monitored in real time. It is important to note that for operational reasons, cameras are rarely monitored in real time.

³ This policy is based upon research and review of over 25 higher education policies publicly available, particularly that of the Virginia Tech policy which provided a comprehensive example.

This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.
1.4.3 Response: When an alarm is raised, an incident is detected, or an incident is reported, an operator can use the video security system to view the location and assess the situation before responders arrive. Video may also be used to observe and document the activities of responders, including use of mobile camera devices carried by an officer and/or attached to their vehicle.

1.4.4 Investigations: After a crime has been committed, recorded video may reveal images pertinent to the investigation of the crime. These images may be immediately shared with local law enforcement personnel, assisting with the rapid identification of suspects and/or the recovery of valuable property.

1.4.5 Situational Awareness: The ability to monitor real-time video can lead to the detection of developing situations that may become a threat to campus safety and security.

1.5 This policy does not apply to video recording or monitoring used for operational purposes, academic purposes, media purposes or recording of public performances, events, or interviews provided that such activity is disclosed or readily apparent to those in view of the camera. Examples of such excluded activities would include videotaping of research subjects, athletic events for post-game review, videotaping of concerts, plays, and lectures, or videotaped interviews of persons.

2. Policy

2.1 The Department of Public and Environmental Safety (DPES) has the responsibility and authority to select, coordinate, operate, manage, and monitor all university video security systems pursuant to this policy. All Tufts University departments are responsible for complying with this policy within their respective operations.

2.2 Video security systems that predate the effective date of this policy shall be brought into compliance with this policy within six (6) months of the effective date of this policy. Unapproved or nonconforming video security systems may be removed.

2.3 Information obtained from the video security system shall be used primarily for law enforcement and investigative purposes. Information will be handled with an appropriate level of security to safeguard against violations of an individual's right to privacy, unauthorized access, alteration, or disclosure.

2.4 Personnel are prohibited from using or disseminating information acquired from the university video security system, except for official purposes. All information obtained and/or observations made via the use of the video security system are considered confidential and can only be used for official university and law enforcement purposes upon the approval of the Director of Public and Environmental Safety or designee. Requests to use or disseminate video security images for

This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.
non-law enforcement purposes will be decided by University Relations. University Relations will seek consultation and advice from the General Counsel related to these requests prior to the release of records.

2.5 Mobile or hidden video security equipment may be used in criminal investigations by DPES only. Covert video security equipment may also be used for non-criminal investigations into specific instances that may be a significant risk to public safety, security and property as authorized by the Director of Public and Environmental Safety or designee.

2.6 Use of any motion or still image monitoring or recording with personal devices such as phones or personal cameras in areas where there is a reasonable expectation of privacy shall follow the same standards of ethical use and governance as detailed in this policy.

2.7 Automated teller machines (ATMs), which may utilize video, are exempt from this policy.

2.8 Any access to or use of recorded video in violation of this policy may result in legal and/or significant disciplinary action, up to and including discharge.

3. Responsibility

3.1 DPES is responsible for the implementation and review of this policy.

3.2 DPES is responsible for determining the appropriate application of video security technologies across all campuses.

3.3 DPES shall monitor developments in the law, security industry practices, and technology to ensure that the application of video security is consistent with best practices and complies with all relevant federal and state regulations.

3.4 DPES will review all written requests for video security equipment installations and removal. DPES will review specific camera locations to determine that the perimeter of view of fixed location cameras conforms to this policy. Requests for the installation and removal of video security cameras by other University departments shall be reviewed by the Director of Public and Environmental Safety or designee, in accordance with the procedure detailed in Section 4 of this document.

3.5 On an annual basis DPES will provide Academic Council a summary of policy compliance; implementation progress; any petitions, appeals or complaints raised by university community members or departments; dissemination of recorded video or still images outside the university; and measurable results of video installations.

This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.
4. Placement and Installation of Video Security Cameras

4.1 The installation of video security cameras will be based upon a need to mitigate an identified risk or vulnerability. Cameras may be placed to view an identified area of risk and/or the ingress and egress pathways of an identified area of risk.

4.2 The locations where video security cameras are installed may include restricted access sites such as departmental computer labs.

4.3 Cameras shall not view locations where persons may reasonably expect to be private. Examples include, but are not limited to, the interiors of restrooms, locker rooms, residence hall rooms, private offices, and human health care treatment areas; however, cameras may be placed in view of the ingress and egress pathways of these locations.

4.4 The installation of non-operable, or “dummy” video security cameras is prohibited.

4.5 Unless being used for criminal investigations, all video security camera installations will be visible.

4.6 Students, faculty, and staff entering certain sensitive areas on campus may have an increased concern for privacy or confidentiality. Concerned persons may petition the Director of Public and Environmental Safety, in writing, to forgo the installation of a proposed camera or for the removal of an existing camera. The petition should identify the location(s) of the camera(s) and should detail the basis for the request. The Director of Public and Environmental Safety will consider the petition and make a recommendation to the Vice President for Operations. The Vice President for Operations or designee will make a decision regarding the appropriateness of foregoing the installation of or the removal of such cameras, weighing the concerns of the person(s) with the responsibility for providing for the safety and security of the university community. Appeals of a decision made by the Vice President for Operations regarding the installation of or removal of camera(s) may be made to Executive Vice President, who is the final arbiter.

4.7 Individual campuses, departments, programs, or organizations may request the installation of video security cameras through a written request to the Director of Public and Environmental Safety or designee, who will review all such requests. Upon completion of review of the request, the Director of Public and Environmental Safety will make a decision about whether to install the requested video security cameras. This decision will be based on the totality of circumstances surrounding the request as well as the proposed use. The requesting party may schedule to meet with the Director or his designee to discuss the final decision. Appeals of a decision made by the Director of Public and Environmental Safety concerning the installation of video security cameras may be taken to the Executive Vice President, who is the final arbiter.
4.8 Purchasing will not accept, approve, or process any order for video security cameras that do not originate from the Director of Public and Environmental Safety or designee.

5. Access and Monitoring

5.1 All video security recording and/or monitoring of activities of individuals or groups will be conducted in a manner consistent with university policies and all applicable state and federal laws.

5.2 Video security recording and/or monitoring will not be based on the subjects' race, color, national or ethnic origin, age, religion, disability, sex, sexual orientation, gender identity and expression, veteran status, or any other characteristic protected under applicable federal or state law.

5.3 All video security recording and/or monitoring will be conducted in a professional, ethical, and legal manner.

5.4 Video 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: high-risk areas, restricted access areas/locations, in response to an alarm, special events, and specific investigations authorized by the Director of Public and Environmental Safety or designee.

5.5 For property protection and personal safety (see Section 1- Scope), access to live video or recorded video from video security cameras shall be limited to persons authorized by the Director of Public and Environmental Safety or designee.

6. Review of Recordings

6.1 University police command staff, including the Director of Emergency Management and their specific designees may play back recorded video while conducting an official investigation. Other than University police command staff, the Director of Emergency Management and their specific designees, the only staff authorized to play back recorded video are on-duty staff assigned to the Public Safety Communications Center, and the Public Safety Officer assigned to the Regional Biosafety Laboratory, when searching for evidence of a recently reported incident.

6.2 The Director of Public and Environmental Safety or designee may authorize sworn law enforcement personnel from other agencies to review recorded video in the course of an official investigation. All other personnel outside of DPES must be expressly authorized to review video by the Director of Public and Environmental Safety or designee.

---

Access in the context of video security refers to reviewing, copying, and disseminating recorded video.

Monitoring in the context of video security refers to viewing video in a live manner.

This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.
6.3 State or municipal law enforcement agencies that use video security may desire live access to university cameras that have views of public streets or properties. Requests for access shall be reviewed by the Director of Public and Environmental Safety, who shall provide a recommendation to the Senior Vice President of University Relations and General Counsel, and the Executive Vice President, who are the final approving authority. In granting any such request, the government agency must stipulate to rules of use consistent with the university policy on use of video.

6.4 No recorded video is to be downloaded to a portable storage device or sent via email except by a member of the DPES command staff, police sergeants and those sworn officers or higher rank in the course of an official investigation in order to preserve the recorded video as evidence. In such cases, the procedures for handling evidence shall apply. Further, all instances of video downloads or sending video by email will be recorded in a video download log maintained by DPES.

6.5 Nothing in this section is intended to limit the authority of DPES in conducting law enforcement investigations and other related activities.

7. **Operation**

7.1 Operation of video security systems will be conducted in a manner consistent with all existing university policies.

7.2 Video security system operators shall:

7.2.1 Monitor systems based on suspicious behavior, not individual characteristics.

7.2.2 Not view private rooms or other areas through windows.

7.2.3 Not continuously view people becoming intimate in public areas.

7.3 Video security systems will not be used for primary detection of non-violent, non-destructive misdemeanor crimes.

8. **Training**

8.1 Video security system operators shall be trained in the technical, legal, and ethical parameters of appropriate video use.

8.2 Video security system operators shall receive a copy of this policy and provide documented acknowledgement that they have read and understood its contents.

---

*Operation in the context of video security refers to controlling positions and focus of cameras; programming video software; and selecting video images to display on monitoring devices.*

*This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.*
9. Storage and Retention of Recordings

9.1 No attempt shall be made to alter any part of any video security recording. The Public Safety Communications Center systems will be configured to prevent camera operators from tampering with or duplicating recorded information.

9.2 All video security records shall be stored in a secure university location for a period not exceeding 30 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 approved use as designated by the Director of Public and Environmental Safety or designee. In higher security areas, retention time may be increased, as deemed appropriate by the Director of Public and Environmental Safety or designee.

10. References

10.1 Tufts University policy references

10.1.1 Information Classification and Handling Policy

10.1.2 Use of Institutional Systems Policy

10.1.3 Information Stewardship Policy

10.2 Federal and State law references

10.2.1 U.S. Const., amend. IV

10.2.2 Katz v. United States, 389 U.S. 347 (1967)

10.2.3 Massachusetts Declaration of Rights, art. 14

10.2.4 Mass. Gen. Laws c.214, § 18

10.2.5 Mass. Gen. Laws c. 272 § 105


<table>
<thead>
<tr>
<th>Executive Sponsor</th>
<th>Approval Date</th>
<th>Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kevin Maguire, Director of the Department of Public and Environmental Safety</td>
<td>02/12/2014</td>
<td>02/12/2014</td>
</tr>
</tbody>
</table>

7 [http://ui.tufts.edu/?oid=788]  
8 [http://ui.tufts.edu/?oid=787]  
9 [http://ui.tufts.edu/?oid=790]  

This document is proprietary, and its contents are the exclusive property of Tufts University. It may not be reproduced in any form whatsoever without prior written permission from an authorized university representative.