Security Camera Usage on University Property Procedures

1.0 BACKGROUND AND PURPOSE

Security cameras are used in various locations on the campuses of West Virginia University. Cameras, commonly referred to as security cameras, are utilized as one tool to enhance the security of the campus community and real property. As the campus constructs new buildings and remodels space, there is a need for a uniform approach to the installation and management of security cameras and access to their recordings. There is also a need to standardize the network technology appropriate to the use of cameras. These procedures are created per WVU-PD 6.

2.0. Definitions

As used within this policy, the following terms are defined as follows.

Security camera: a camera used for monitoring or recording public areas for the purposes of enhancing public safety, monitoring restricted areas or equipment, to discourage theft and other criminal activities, and for preventing, investigating, and resolving incidents.

Security camera monitoring: the real-time review or watching of security camera feeds.

Security camera recording: a digital recording of the feed from a security camera.

Security camera systems: any electronic service, software, or hardware directly supporting or deploying a security camera.

3.0 PROCEDURE

West Virginia University may use security cameras to record public areas as a tool to deter crime, solve criminal acts and to assist the University Police Department (UPD) in protecting the safety of persons and property on campus. This policy shall apply to all security camera monitoring conducted by the University. Monitoring of campus areas for security purposes will be conducted in a manner consistent with University policies and applicable state and federal law.

3.1 Camera Placement:
All buildings and grounds on the campus, as well as parking lots, sidewalks, and campus green space areas may be subject to security coverage. Cameras may be placed in locations including, but not limited to areas with high foot traffic, where there is suspected criminal activity, or containing high-value equipment. Cameras will not be placed in locations where there is a reasonable expectation of privacy (i.e., restrooms, dressing rooms, athletic locker rooms, residences, etc.). If an observation camera is installed where identification of personal images is possible, the camera must be accompanied by appropriate signage indicating the presence of the camera and whether or not it is monitored in real time. The University Police will be consulted prior to any installation and make a determination as to whether a camera system is warranted. If the determination is that a camera system is unwarranted, the department may appeal the decision through their Vice
President who will be provided the rationale for the disapproval made by the University Police. The University Police may consult with other campus departments as deemed appropriate.

3.2 Location and Signage:

Devices will be in plain view and signage must be installed that indicates whether or not 24/7 monitoring of activities is provided (Example -SECURITY CAMERAS IN USE. These cameras are not actively monitored.”)

3.3 Equipment and Technology:
As the campus moves to a centralized security system, existing security equipment such as analog cameras and Digital Security Recorders (DVR) may be utilized through the remaining usable life of the equipment. Maintenance of these legacy systems is the responsibility of the department owning the system. Upon equipment failure or the need for cameras with more functionality, the department shall upgrade to the current campus standard. The current standard is IP networked cameras which record footage to the centralized Smart Video Recorder (SVR) Server. The SVRs are maintained by the Student Life Information Technology (SLIT) Department in coordination with the University Police Department (UPD) and the Office of Information Technology (OIT).

3.4 Camera Footage:
Real-time monitoring of security cameras will not be provided by UPD, and any footage or information obtained through security recording will be used exclusively for law enforcement, security, and official University business purposes, or as otherwise required or permitted by applicable law.

3.5 Funding:
Costs of new equipment, associated infrastructure, on-going maintenance, and hardware upgrades are the responsibility of the requesting department.

3.4.1 Use of Recordings

Security camera recordings, with the approval of the Chief of Police, are to be used for the purposes as described in the definition of a “security camera”. This use extends to their release by the University Police to external law enforcement agencies. Records of the access to, and release of, Security Camera recordings must be sufficient so as to validate compliance with this policy.

Security camera recordings may not be used in the course of personnel investigations such as those related to (but not limited to) work place attendance or work quality. The use of security camera recordings for any purpose not detailed within this policy is subject to the campus policy on the Appropriate Use of Information Technology Resources Policy, which can be found at: http://oit.wvu.edu/policy/oit/oit-8/.

Recordings from cameras whose primary function is not security (such as classroom lecture capture) may, with the authorization of the Chief of Police, be used for the purposes described in
the definition of a security camera. In these circumstances the Chief of Police will inform the unit head when requesting or acquiring the recording.

4.0 RESPONSIBILITIES
Administrative and operational responsibilities for new security cameras and recordings are shared among the following areas:

4.1 Information Technologies Services (ITS):
ITS shall oversee any new security camera installation for technical compliance with network resources and campus network policies. The custodian of record for security camera recordings is the Chief Police.

4.2 University Police Department (UPD):
Shall oversee and coordinate the use of camera monitoring for safety and security purposes.

4.3 Departments that own equipment:
Administrative and operational responsibility for legacy camera systems resides with the departments that own the equipment. Each department will have a designee to serve as the custodian of the security camera recordings for that department.

4.4 Research or Academic Use:
The Provost or designee approves requests for use of cameras in teaching. Approval must first be obtained by the appropriate entity mentioned above. If the request to use fixed/installed cameras in research or teaching situations is approved, installation is governed by this document.

5.0 OPERATIONS

5.1 Camera Placement:
Requests for placement of new security cameras can be made by submitting a work order through the Department of Facilities Management website (https://fsd.wvu.edu/request.cfm).

Prior to installation, all requests will be reviewed by the University Police who may convene a committee consisting of representatives from SLIT, ITS and/or Facilities Management, if deemed necessary. The UPD or the committee will make a recommendation to the appropriate vice president, who will make the final decision regarding camera placement in the area in question and in a manner consistent with the stated policy.

5.2 Equipment and Technology:
Purchase of equipment should be made in consultation with SLIT/UPD or review committee when convened. Costs of new equipment, software, associated infrastructure, on-going
maintenance, and hardware upgrades are the responsibility of the requesting department. Once the request for installation is approved and the equipment is purchased, SLIT will oversee and/or install the security camera hardware, and ITS staff will make the appropriate connection to the master SVR Server. The SVR server for the security camera system shall be maintained in a secure server room with restricted access.

5.3 Camera Footage:
Security recordings will be stored for a minimum of 21 days subject to the availability of disk space by the UPD, and will then be erased/overwritten unless retained as part of an investigation, or pursuant to an order of preservation of evidence or court proceeding, or for other official campus business purposes as determined by the UPD. Departments requiring longer retention may be required to purchase additional storage space or a separate NVR server.

Recordings may be viewed by designated departmental representatives and other university employees outside of the University Police Department for legitimate business purposes on a need-to-know basis as determined by the WVU General Counsel or Chief of Police.

Requests to inspect security camera systems or obtain copies of security recordings must be made in writing to the Office of General Counsel and must comply with the provisions of WV Codes §29B-1-1 through §29B-1-7 (Freedom of Information). Depending on the nature of the request, certain fees permitted by law may be charged to the requesting party.

FERPA: Any recording that includes personally-identifiable images of students is governed by the Family Education Right to Privacy Act (FERPA) once released by the University Police to another campus department. The student's right to privacy must be protected by the receiving department.

5.4 Security Camera Placement
a. University Police may establish temporary or permanent security cameras in public areas of the campus.

b. Security cameras may not be used in private areas of the campus pursuant to law including the West Virginia Criminal Code or consent.

c. Private areas include residence hall rooms, bathrooms, shower areas, locker and changing rooms, areas where a reasonable person might change clothes, and private offices. Additionally rooms for medical, physical, or mental therapy or treatment are private. Where Security Cameras are permitted in private areas, they will to the maximum extent possible be used narrowly to protect individuals, money, real or personal property, documents, supplies, equipment, or pharmaceuticals from theft, destruction, or tampering.

d. To the maximum extent possible security cameras shall not be used to get close-up video through the windows of any private residential space or office. If needed, electronic shielding will
be placed in the security camera so that the security camera cannot be used to look into or through windows.

e. To the maximum extent possible, security cameras shall not be directed at the windows of any private building not on University property.

6.0 STANDARD APPROVED DEVICES

The devices approved for installation are specified in Appendix A, "Equipment Standards and Specifications." The list will be updated periodically. The Office of Information Technology and/or the UPD are responsible for maintaining the list of approved equipment. Standards apply to replacement and new acquisitions.

7.0 DISCLAIMER

No person should assume that the presence of a security camera system on campus will guarantee safety for persons or property at all times. Rather, it is one tool in the University’s continuing efforts to promote campus security and safety.

8.0 REPAIR AND MAINTENANCE

The original requesting department is responsible for funding and coordinating repair and maintenance needs with the appropriate office completing the service. Departments will be required to submit the appropriate work order for the services required that includes the following:

Location(s) of existing equipment

Explanation of the issue

Account number to be charged

If a failure occurs in a high risk area that has been identified as such by UPD, report to the Police Communication Center at 304-293-2677 (COPS).

9.0. Compliance

The Chief of Police will ensure that records related to the use of security cameras and recordings from security cameras are sufficient to validate compliance with this policy. Units that maintain or support security camera technology must also maintain records and configure systems to ensure compliance with this policy. Security camera systems procured by units will need to ensure compatibility with the system identified as the campus standard by the Chief of Police.
The campus security office in the Office of the Chief Information Officer or designee will review upon request the information technology security applying to security camera systems and provide the Chief of Police with a summary of its findings and recommendations. A failure to meet the requirements of this policy may result in loss of the ability to support, maintain, or deploy security cameras at the discretion of the Chief of Police.
APPENDIX A: EQUIPMENT STANDARDS AND SPECIFICATIONS

Denial of Access. IP addressable cameras and IP addressable digital recorders making a connection to WVU’s network must allow for denial of access by other than those users specifically included in a system Access Control List.

Access through VPN. All access to IP addressable cameras and associated digital recorders used to deter or record misconduct will be accomplished through the centrally managed Virtual Private Network (VPN).

Audit Reporting of Accesses. Digital recorders used to collect and store identifiable personal images should be configurable to allow audit reporting of access to the recorder.

Storage Standards. Digital recorders used to collect and store identifiable personal images should:
- include technology for "watermarking" of files in order to be suitable for evidentiary documentation
- include capability for transfer of stored images to external storage media
- may require vendor specific/proprietary applications or software clients for viewing live or stored images
- provide a minimum of 21 days of image storage from all connected cameras in the recording device; exceptions will be made on an individual basis by the ISO
- provide for tracking of recordings to prove chain of evidence
- provide protection of equipment to preclude removal of evidence by other than the responsible person.


Detailed Specifications

Note: Cameras must be compatible with software currently in use by UPD, for current specifications contact Captain Ricky Jackson (304) 293-3136 or Ricky.Jackson@mail.wvu.edu.

Contractor shall provide labor to mount cameras and housing, the University will provide access to drawings, wiring, power and WVU make the final connection to the network.

Successful bid will include system compatible cameras, encoders, equipment cabinet/encloser, software licenses, workstation, related installation materials, and labor to fully deliver a functional system as required by the project. Quantities will be determined by individual installation projects and cameras and related materials are to be available within 30 days of project notification.

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