

Policy on Security Camera Systems

Policy Title	Policy on Security Camera Systems
Policy #	01.109. 22 <u>23</u>
Policy Owner	Assistant Vice President for <u>Director of</u> Public Safety
Contact Information	Questions about this policy should <u>can</u> be addressed to the Director of <u>Assistant Vice President for</u> Public Safety at (401) 874-4910
Approved By	Administrative Policy Committee
Effective Date	
Next Review Date	No later than
Who Needs to Know About this Policy	All faculty, staff, and students of the University as well as University Affiliates.
Definitions <i><u>Defined terms and shorthand references are capitalized throughout.</u></i>	<p>Security Camera Systems. A system that monitors and/or records a specific location or activity for safety and security purposes on University premises, including closed circuit television cameras (“CCTV”) and License Plate Reader (“LPR”) cameras.</p> <p>University Affiliate. Any individual who is not a faculty member, staff, or student who otherwise has a formal relationship with the University, including but not limited to visiting scholars, visiting students, research fellows, professional program participants, club sports coaches, and volunteers as well as employees and associates of the URI Foundation and Alumni Engagement, URI Research Foundation, and members of the University of Rhode Island Board of Trustees. Vendors and contractors are not considered University Affiliates, except for those with an ongoing presence on the University campus as regular operations support staff.</p> <p>University Property. Property belonging to the State of Rhode Island and held in trust by the University of Rhode Island Board of Trustees; property held by the University of Rhode Island or any of its component units in its own name; and property owned by third parties but assigned to, occupied by, or managed by the University or any of its component units. <u>University Property includes all real property, including without limitation land, buildings and other structures, fences, driveways and walkways, and other permanent improvements and associated infrastructure.</u></p>
Statutes, Regulations, and Policies Governing or Necessitating This Policy	<p>U.S. Const. amend. IV (Search and Seizure). Fourth Amendment to the U.S. Constitution</p> <p>John S. McCain National Defense Authorization Act for Fiscal Year 2019 (NDAA FY2019), Pub. L. No. 115-232, § 889(a)(1)(B) (Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment). Section 889 of the John S. McCain National Defense Authorization Act (Prohibition on Certain Telecommunications and Security Camera Services or Equipment).</p> <p>RIGL § 28-6.12-1 (Employee privacy<u>Privacy protection</u>Protection)</p>

	<p>RIGL § 11-35-21 (Unauthorized Interception of Oral Communication)</p> <p><u>Unauthorized Interception of Oral Communication, 18 U.S.C. § 2511. (Unauthorized Interception of Oral Communication)</u></p> <p>University of Rhode Island Policy on the Use of License Plate Reader Technology</p>
Reason for Policy/Purpose	The purpose of this policy is to regulate the use of Security Cameras Systems on the University of Rhode Island campuses to monitor and record public areas for safety and security, to assist in the investigation of incidents that occur on the campuses, and for operational purposes.
Forms Related to this Policy	<i>Security Camera Request</i> <i>Request for Video Footage</i>

Policy Statement

The University of Rhode Island (also, “University”) aims to provide its community with a safe and secure environment, which is enhanced by using Security Camera Systems to monitor its campuses. The University is sensitive to the privacy, freedom of expression, and freedom of assembly relative to its community members, and subsequently this policy limits the use of approved equipment and the circumstances in which recorded material may be gathered and/or released.

Safety and security purposes include but are not limited to protection of individuals, including students, faculty, staff, and University Affiliates; protection of University Property, including but not limited to building perimeters, entrances and exits, lobbies and corridors, elevator cabs, receiving docks, special storage areas, laboratories, and cashier locations; monitoring of common areas and areas accessible to the public, including transit stops, parking lots, public streets, and pedestrian walks; investigation of criminal activity; protection against acts of terrorism or related criminal activity; and protection of critical infrastructure as defined under the USA Patriot Act or the United States Department of Homeland Security.

I. Administration of Security Camera Systems

The URI Department of Public Safety oversees and coordinates the installation, use, and/or removal of all Security Camera Systems on all University campuses (see Exceptions). Additionally, the ~~Director Assistant Vice President for of~~ Public Safety approves all installation and use of all Security Camera System equipment/systems on University Property (other than as provided for in Exceptions) and maintains a list of all approved Security Camera Systems on University Property.

The Security Camera System owner is the department or unit responsible for monitoring the operation of a specific Security Camera System. That department or unit shall designate up to two individuals, in addition to Public Safety personnel with access, who shall have view-only access rights to live and/or recorded security camera footage from that system under the terms of this policy.

A University department or unit wishing to install security cameras must install them as components of the University’s centralized system for which the Department of Public Safety is the Security Camera System owner.~~A University department or unit wishing to install a Security Camera System may select one of two options:~~

- ~~1. A stand-alone installation, for which the department or unit requesting the installation will act as the Security Camera System owner and have responsibility for management and maintenance of that Security Camera System.~~

~~2. A compatible component of the University's centralized system for which the Department of Public Safety is the Security Camera System owner.~~

~~When cameras are installed at an individual department's request~~Under the second option above, the department or unit wishing to install a camera system shall be responsible for all costs associated with server upgrades, maintenance, repairs, and personnel time for the life of the system while continuing to maintain University standards. ~~Under either option, a~~All camera feeds must be viewable in real time by the URI Department of Public Safety in the campus Public Safety Dispatch Center, Emergency Operations Center, and/or other locations as specified by the ~~Director~~Assistant Vice President for Public Safety. All Security Camera System equipment must be compatible with the University's centralized system unless covered by Exceptions below.

Installation of new, stand-alone Security Camera Systems is not permitted unless specifically approved by the Assistant Vice President for Public Safety as provided for in Exceptions below. Existing legacy stand-alone Security Camera Systems must be transitioned to the University's centralized system or decommissioned and removed no later than December 31, 2028. During the interim, where~~For~~ legacy, stand-alone systems ~~that~~ are not capable of integration with the University's centralized system, the system owner must either provide the Department of Public Safety with full-time remote access to their system or, if remote access is unavailable, direct physical access to the camera servers or other such location where Department of Public Safety personnel can access video records at any time of day, any day of the week.

The University falls under the terms of Sec. 889 of the John S. McCain National Defense Authorization Act, which disallows the purchase of Security Camera System services or equipment from certain international vendors (that may change from time to time). Adherence to Sec. 889 rules will be coordinated at the time of a system's approval by the Department of Public Safety with input from the Division of Research and Economic Development.

Third parties and other University units may not install Security Camera Systems or any other surveillance equipment on University-owned property without the express written permission from the ~~Director~~Assistant Vice President for Public Safety. All details relative to such installation and usage, if permitted, must be included in the associated contract documents (e.g., those for a University capital projects, ongoing maintenance, or other provision of service). Cameras owned and operated by individual University departments or units that were installed and are in good working order prior to enactment of this policy may continue in operation until the system malfunctions ~~or~~and must in any event be decommissioned and removed no later than December 31, 2028, if they are not capable of integration with the central Security Camera System. ~~is due for upgrade or replacement.~~

II. Repairs and Upgrades

The Department of Public Safety covers the cost of routine repairs to existing camera infrastructure (e.g., replacement of a defective camera, replacing a failed power supply, etc.) with the following exceptions:

1. Enterprise and auxiliary units of the University are responsible for all costs associated with maintaining, repairing, and upgrading the camera infrastructure associated with their buildings.
2. Individual University departments ~~that own their own cameras and camera systems~~that have requested cameras beyond the baseline coverage provided by the Department of Public Safety are responsible for all costs associated with hosting, maintaining, repairing, and upgrading those systemscomponents. a

The Department of Public Safety is not responsible for the cost of new installations of additional cameras or major infrastructure upgrades (for example, conversion of multiple legacy analog cameras to digital, IP-based units). The cost of such projects must be borne by the department seeking such improvements or included in the cost of the associated capital projects, if applicable. When multiple cameras are added to the centralized system, the

Department of Public Safety may, at its discretion, ~~charge a one-time fee to cover any pass-on direct~~ costs related to upgrading server hardware and/or licensing necessary to support the additional installations.

III. Real-Time Monitoring

The existence of this policy does not imply or guarantee that Security Camera Systems will be monitored in real time. The University of Rhode Island assumes no additional liability for campus safety as a result of utilizing Security Camera Systems and/or making determinations for when a system is or is not monitored in real time.

IV. Camera Locations

Important elements such as privacy, fields of view, mounting conditions, and aesthetics are considered before any particular camera installation is proposed. Proposed locations must adhere to all applicable state and federal laws as well as any applicable University of Rhode Island policies and current collective bargaining agreements.

As a guideline, the selection of installation locations ~~shall~~should emphasize the general need to monitor and record:

- People entering and exiting campus buildings.
- Circulation in the public areas of those buildings (i.e., hallways, atriums/lobbies, stairs, etc.).
- Pedestrians in public areas of campus.
- Vehicles traveling on campus roadways and in campus parking facilities, and
- High-risk spaces or spaces designated as "important" such as labs, the President's Office, rooms with expensive equipment, etc.

Video monitoring/recording for safety and security purposes will be limited to locations that do not violate any individual's reasonable expectation of privacy as defined by law. The University's Office of General Counsel will be consulted whenever there are questions about the applicability of current law or legal precedent.

All cameras must be in plain view for the community to easily identify. Covert cameras will only be utilized with specific authorization for surveillance that is limited in scope, for a specific period of time, and requested by the University of Rhode Island Police Department or the Office of General Counsel.

Decoy or fake cameras are not permitted. Outdated systems with existing inoperable equipment must be removed within ~~six (6) months~~sixty (60) days of deactivation by the system owner at the owner's expense.

With the exceptions of Security Camera System equipment used by the Police Department, to the extent permitted by law, in its interview rooms and cell block areas, Security Camera System components shall not monitor or record sound except under as necessary to protect life and property during emergency incidents and then only upon authorization by the URI Police Department~~equipment shall not possess the capability of recording sound.~~

V. Retention and Records

Recorded events are stored temporarily on a server/hard drive unless retained as part of an incident report, criminal investigation, court proceeding, or other bona fide use as approved by University legal counsel. The server/hard drive used for temporary storage must be capable of storing images for a minimum of thirty (30) days. All footage will be maintained for a minimum of thirty (30) days (or longer if otherwise required by statute or regulation) and may be ~~and may be~~ purged or overwritten after that date. All recordings, including those retained for the purposes noted above ~~and those on the server with temporary~~, must be retained in a secure location with access by authorized personnel only.

Departments or units with stand-alone Security Camera Systems must provide, and the URI Department of Public Safety must store, information (for open records requests) about active Security Camera Systems at the University. These records must include:

- System ownership
- Name of individuals with access rights to the system
- Purpose of cameras
- Camera location(s)
- Authorized contacts for the system
- Video retention period (if greater than the minimum thirty [30] days)
- Purpose to review the submitted via incident or police report submitted to URI PD

VI. Public Notice

~~Security Camera System owners are responsible for procuring and placing appropriate signage to alert the public of the use of security cameras in that area. All signage must meet standards determined by the Department of Planning and Real Estate Development prior to installation. Security cameras are in widespread use throughout University Property. Except in locations where a reasonable expectation of privacy exists (e.g. restrooms, locker rooms, residential living quarters, and similar private spaces), security cameras may be present in any outdoor area or indoor common or non-private area. All people present in such areas shall have no reasonable expectation of privacy with respect to video monitoring of their movements, activities, or conduct.~~

VII. Access to Video

University personnel are prohibited from using or disseminating any information acquired from the video equipment except for official purposes. All information and/or observations made in the use of video security equipment are considered confidential and may only be used for legitimate ~~security~~public safety, law enforcement, policy enforcement, and ~~student-community~~ safety/community welfare purposes and for compliance with federal, state, and local laws and regulations as well as University policy. Security Camera Systems are not intended for monitoring normal, day-to-day student or employee activities, behavior, or practices, though video footage may be used to investigate specific allegations of misconduct where authorized by the Assistant Vice President for Public Safety or their designee. ~~and~~ Requests for video footage outside of the purposes noted above will be reviewed on a ~~case-by-case~~case-by-case basis by the ~~Director~~Assistant Vice President of Public Safety or their designee for appropriateness and necessity. Information obtained through video monitoring/recording can only be used for official University and law enforcement business, will only be released when authorized by the Assistant Vice President ~~Director~~for of Public Safety, and shall be released in compliance with RIGL § 38-2 (Access to Public Records Act), or as otherwise required by law. Restricted access to certain cameras can be issued for authorized individuals in each monitored area.

Lawful requests originating from outside the University (e.g., subpoenas, search warrants) for recorded video must be forwarded to the University of Rhode Island Office of General Counsel, which is solely responsible for reviewing and responding to all such requests, including subpoenas from law enforcement to release recordings obtained through Security Camera Systems at the University. Internal requests for recorded video will be reviewed by the ~~owner of the Security Camera System~~Assistant Vice President for Public Safety, who may seek guidance regarding such requests when the request is generated from within the Security Camera System owner's business unit or department. ~~Internal requests made by individuals outside of the Security Camera System owner's business unit or department must review such requests in conjunction with Public Safety and~~from Human Resources and/or the Office of the General Counsel, as appropriate, before any approvals. The process for requesting footage can be found in the procedures that accompany this policy.

Certain camera systems, generally those installed for marketing purposes that stream images of the University campus(es), do not store, and are not required to retain, camera footage.

Except for camera systems used by the University as marketing tools, (for example, “Quadcams” or other systems designed for marketing or other public relations purposes that may be designated from time to time by the Director Assistant Vice President of for Public Safety), no Security Camera Systems may be accessible from the public internet. All systems must be on a private subnet created by IT Infrastructure Services (ITIS) that is isolated from the internet. If remote access is required from off campus, a University VPN connection with two-factor authentication must be used.

VIII. Other

All systems are subject to random audits for compliance with security standards and retention policies.

If, in the course of collecting video information for any of the purposes outlined in this policy, the University discovers student or employee activities that warrant disciplinary action, the videotaped information may generally be used in such disciplinary action if and to the extent its use is consistent with applicable law and binding legal precedent.

Specifics regarding license plate reader systems that may differ from this policy, including but not limited to the use of data, data retention, privacy, and data access, may be found in the University of Rhode Island policy on the Use of License Plate Reader Technology.

Nothing in this policy shall interfere with any rights relative to collective bargaining or University policy.

Exceptions

This policy does not apply to video recording or monitoring used for University operational, academic, media, or research laboratory purposes or to the recording of public performances or interviews provided that such activity is disclosed or readily apparent to those in view of the camera.

This policy does not apply to video recording related to video conferencing.

For the purposes of this policy, camera systems operated by External Relations and Marketing for public relations purposes are not considered Security Camera Systems. This includes cameras installed at construction sites for purposes of public promotion.

This policy does not apply to body-worn cameras operated by the URI Police Department. A separate policy shall govern the use of body worn cameras at the time they are instituted by the URI Police Department.

The Assistant Vice President for Public Safety may grant an exception and authorize a stand-alone Security Camera System where genuinely necessary to University business needs (e.g., a federal grant requirement) or where an integrated system would be impractical (e.g., shipboard cameras). In such cases, stand-alone camera equipment shall, to the greatest possible extent, still follow the University’s camera equipment standards even if not connected to the central system.

Further exceptions may be approved by the Director Assistant Vice President of for Public Safety.

Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

Policy #	Effective Date	Reason for Change	Changes to Policy
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10.109.1	November 7, 2018	n/a	n/a
01.109.2	October 11, 2022	Scheduled Review	Additional language on legacy systems, repair and maintenance, streaming systems; and general guidance on camera locations.
01.109.3		<u>Review requested to reflect ongoing phase-out of stand-alone cameras.</u>	<u>Accelerated phase-out of stand-alone cameras, and removal of the signage requirement.</u>

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