

Policy on Security Camera Systems

Policy Title	Policy on Security Camera Systems
Policy #	01.109.1
Policy Owner	Director of Public Safety
Contact Information	Questions about this policy should be addressed to the Director of Public Safety at (401) 874-4910
Approved By	Administrative Policy Committee
Effective Date	February 1, 2021
Next Review Date	No later than June 30, 2022
Who Needs to Know About this Policy	All faculty, staff, and students of the University as well as University Affiliates
Definitions	<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.</p>
Statutes, Regulations, and Policies Governing or Necessitating This Policy	<p>Fourth Amendment to the U.S. Constitution</p> <p>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 protection)</p> <p>RIGL 11-35-21 (Unauthorized Interception of Oral Communication)</p> <p>18 USC 2511 (Unauthorized Interception of Oral Communication)</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 on the URI campuses to monitor and record public areas for reasons of safety and security and to assist in the investigation of incidents that occur on the campuses.
Forms Related to this Policy	<i>Security Camera Request</i>

Policy Statement

The University of Rhode Island 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.

Administration of Security Camera Systems

The URI Department of Public Safety oversees and coordinates the installation, use, and/or removal of Security Camera Systems on all University campuses (see Exceptions). Additionally, the Director of Public Safety approves all use of Security Camera System equipment/systems on University Property, other than as provided for in Exceptions, and shall maintain 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 an individual who shall have singular 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 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.

With either option, camera feeds must be able to be viewed 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 of Public Safety. All Security Camera System equipment must be compatible with the University's centralized system unless covered by Exceptions below.

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.

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 is due for upgrade or replacement.

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 of when a system is or is not monitored in real time.

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.

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, fake, or otherwise inoperable cameras are not permitted. Outdated systems with existing inoperable equipment must be removed within six (6) months 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 equipment shall not possess the capability of recording sound.

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 will be capable of storing images for a minimum of thirty (30) days. Footage will be stored no more than ninety (90) days and, if no longer needed, may be purged or overwritten after that date. Recordings must be retained in a secure location with access by authorized personnel only.

Departments or units with 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 individual with singular access rights to the system
- Purpose of cameras
- Camera Location(s)
- Authorized contacts for the system
- Video retention periods (if greater than the minimum thirty [30] days)

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.

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, law enforcement, policy enforcement, and student safety/community welfare purposes and for compliance with federal, state, and local laws and regulations as well as University policy. 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 Director of Public Safety, and shall be released in compliance with Rhode Island General Laws, Chapter 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 (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 subpoenas from law enforcement to release recordings obtained through Security Camera Systems at the University.

Except for cameras used by External Relations and Communications as marketing tools, (for example, "Quadcams"), 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.

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.

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.

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.

Further exceptions may be approved by the Director of Public Safety.