



CCTV Policy

**Department of
Access Control & Security Systems**

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(Policy herein incorporated into the CSU Master Security Plan.)

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Purpose

Cleveland State University (CSU) holds the security and safety of individuals on campus as one of the utmost concerns. Closed Circuit Television (CCTV) security surveillance is an important tool to assist keeping individuals, property, and research as safe as possible.

The purpose of this document is to convey the CSU CCTV Policy (hereafter referred to as “policy”) that regulates CCTV use and related systems for necessary system compatibility, standardization, image quality, restrictions, and responsibility.

Departmental procedures, protocols, manuals, forms, and other detailed operational processes to fulfill the policy are not intended to be stipulated in this document, but are instead the responsibility of the Access Control & Security Systems (AC&SS) Department.

This policy applies to all faculty, staff, students, affiliates, auxiliary organizations, contractors, and suppliers who are or become involved with a CCTV device or related need at CSU.

Rescinds

The effective date of this document (as displayed on the title page) replaces and supersedes previously dated CCTV-related guidelines, protocols, understandings, and/or similarly intended documents or practices.

The latest version of this document shall be publically posted on the CSU Access Control & Security Systems webpage: <http://www.csuohio.edu/offices/accesssecurity/>

Authority

This document becomes CSU policy when approved by the CSU Board of Trustees. The Director of AC&SS (or similarly tasked future University officer or employee) is responsible for processes and decisions to uphold policy compliance.

Compliance

All members of the University community (students, faculty, staff, affiliates, etc.), those doing business with or at the University, and those on University-controlled property must fully comply with the policy. Failure to comply could result in one or more of the following, but not limited to:

- Judicial Affairs review by the appropriate University entity for disciplinary action
- Human Resources investigation leading to potential disciplinary action
- Loss of CCTV access privileges
- Legal action

Any contracted company that may manage a CSU-related facility, including a residence hall(s), must abide by this policy, maintain University AC&SS CCTV standards, contractual agreements, and any written or verbal instructions from the AC&SS department related to CCTV.

Any perceived use of CCTV systems not in accordance with this policy must be reported to the Director of AC&SS for compliance correction.

Campus Notification

Upon approval of this policy, the document shall be announced once through the University's mass e-mail communication method, currently known as the *Campus Mailbag*, and announced on the CSU main webpage. The policy will be made publically available on the AC&SS webpage:

<http://www.csuohio.edu/offices/accesssecurity/>

Responsibilities

The Director of AC&SS has the responsibility for determining proper security-related measures, hardware, and software for any CSU-related facility, including the documentation and licenses for the systems and equipment needed to maintain AC&SS standards. All aspects of CCTV (equipment, maintenance, system design, placement, views, installation, pre-sets, use, etc.) are under the direction and authority of the AC&SS department.

After device/system acceptance, AC&SS is responsible for the transmission of images from the camera to the local recording device (DVR, NVR, SVR, etc.). The CSU Information Services & Technology (IS&T) department is responsible for secure transmission of images/data from the local recording device to the mass storage device and other approved locations.

Coverage

The intent of CCTV coverage on campus is as a security tool to deter crime and provide a historical record of covered incidents. There will be no diversion of security technologies and personnel for other purposes (including without limitation uses prohibited by other CSU policies, *e.g.*, CCTV monitoring of political or religious activities, employee and/or student evaluations, etc.) as that would undermine the availability of the resources for their intended purpose.

During the design phase for new installations, the Director of AC&SS will meet with the building's representative or funding sponsor and a designated University Police representative to explain the CCTV design and obtain feedback for any potential adjustment the AC&SS Director deems appropriate. Once a plan is approved by the Director of AC&SS, deviations must be approved by the Director of AC&SS and updated on the construction plans by the contractor.

The Director of AC&SS will select camera positions, angles, views, and pre-sets with the ability to change a view based on a change in environment or need. At least once a year, the Commander of Police will designate a representative to review existing camera views for potential need for adjustment.

CCTV installation will not occur in areas where there is a reasonable expectation of privacy, such as: inside restrooms, inside locker rooms, inside dressing rooms, and similarly situated spaces.

Covert camera use and recordings will only be used to aid in criminal investigations by the University Police Department. Approval of such use must be pre-approval by the University Police through the Director of Access Control & Security Systems.

Image & Footage Availability

Generally, security camera images and feeds are not live-monitored by any individual, but all camera images are intended to be recorded 24/7/365. Lighting conditions, equipment quality, and a camera's custom trigger parameters may affect image availability. Live and recorded images are available to the University Police and AC&SS. Access by others to any camera image or feed must be approved by the Director of AC&SS.

Unauthorized access or distribution of any camera image is strictly prohibited; permissions must be obtained from the Director of AC&SS. Any violation to any degree is interpreted as a very serious matter, and violators are subject to the full extent of University discipline and potential criminal charges.

The University's goal is to retain recorded images for 30-days; however, there are numerous factors that can limit the retention significantly on a specific camera's recorded history. Request to review or be provided recorded CCTV images should be made immediately upon identifying the potential need.

Requests for access to review or release CCTV should be made in accordance with CSU's Public Records Policy.

Review of footage to investigate potential employee misconduct requires pre-approval from the Assistant Vice President of Human Resources; any use of CCTV footage specifically for the purpose of investigating employee misconduct must conform with applicable CSU policies and, for employees who are members of a collective bargaining unit, the terms of any applicable collective bargaining agreement.

Video or images requested for criminal investigation purposes by the CSU Police or other law enforcement agencies having jurisdiction is not subject to the CSU Public Records Request procedures. AC&SS staff will make every effort to assist the requesting agency in quickly obtaining video as needed to aid in the apprehension of a person who has committed a crime or prosecution of criminal activity. In circumstances where, based on a determination by the Executive Director of Campus Safety in consultation with the Office of General Counsel, an immediate threat to health or safety of the campus community exists, video shall be made available to law enforcement immediately. For cases involving investigation of individuals not posing an immediate threat, video shall be delivered in response to a properly issued warrant or subpoena.

For a major security or safety incident, the Director of AC&SS will take all actions necessary to preserve related CCTV footage.

Fees

AC&SS will provide at no cost to University entities regular maintenance and reasonable repair (excluding abuse) of existing CCTV equipment and systems as funding and staffing allow.

For non-maintenance related service, costs will be payable by the requesting or responsible entity based on the actual cost of the item (if any) and labor. Non-maintenance items/service may include, but is not limited to:

- Upgrading equipment
- Extensive repairs
- Installation of new equipment
- Projects

In relation to CSU's Public Record Request policy, provision to a requestor of CCTV images or footage on a removable medium will be provided at the cost of the medium. The Director of AC&SS will provide the requestor with an approximate estimate of costs prior to fulfilling an approved request.

Code of Practice

Authorized viewers of CCTV images or feeds will adhere to the following Code of Practice:

1. Viewers will not monitor individuals solely based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the University's non-discrimination directive.
2. Viewers will not zoom-in and continuously view people becoming intimate in public areas.
3. Viewers will not zoom-in on any portion of a person other than for purposes of determining an action taking place, identification, training, or testing of equipment.
4. Viewers will not zoom-in through windows into offices or residential rooms unless a potential incident is in development and such camera control is authorized by the University Police Officer-in-Charge (OIC) or senior Campus Safety management.
5. Viewers will not use images for the purpose of identifying employee behavior or evaluating performance. Information obtained in violation of this policy may not be used in a disciplinary proceeding against a member of the University.

A violation of the above Code of Practice is subject to disciplinary action consistent with the rules and regulations governing members of the University community.

The Director of AC&SS will maintain a list of all authorized viewers of any camera.

Installation

It is the responsibility of the Director of AC&SS and the University Architect's Office to ensure that this document and the University's Master Security Plan are provided and accepted by any general contractor or project principal that will be involved in the installation of CCTV-related equipment or systems. Indications of policy or plan non-compliance must be reported to the Director of AC&SS for corrective action.

Installation or repair of any camera or image recording device must be performed by a qualified individual that has been approved by the Director of AC&SS. Contractors must schedule service with the AC&SS video unit prior to doing work on campus.

For a contracted installation, AC&SS staff are neither the project managers, nor expected to supervise an installation. As the customer representing the University, AC&SS will pre-approve of the design, equipment, installation locations, and operation of the device/system, with the expectation that the contractor/installer will deliver a turn-key fully operational device and/or system with a fully functional tie-in to the University's existing enterprise-level video system.

Individuals having knowledge of the installation details and operation of CCTV equipment and systems shall keep the information confidential. Any questions or concerns regarding installation work or operations must be directed to the Director of AC&SS.

Regardless of the intended use, unauthorized fixed-mounted or stationary cameras, pan-tilt-zoom cameras, webcams, or other image capturing devices for personal or work-related use may not operate on CSU property without the written consent of the Director of AC&SS. Violators are subject to University discipline and/or legal action.

Non-security related video equipment that may be approved at the discretion of the Director of AC&SS include, but are not limited to:

- Construction project progress
- CCTV system for research or academic purposes
- Training purposes
- Distance Learning Labs

For CCTV equipment approved for use, the Director of AC&SS may require appropriate signage be publically posted notifying of the potential use of live or recorded video and/or audio.

Plans / Drawings

All installed equipment and its related parts will be compatible with the existing enterprise-level security/video system at CSU, and plans/drawings will be provided by the contractor to the Director of AC&SS for approval before work begins. In the design phase, AC&SS will denote specific equipment placement and type. No plan deviation, alterations, or substitutions may be made without the consent of the Director of AC&SS.

The AC&SS will maintain a log of all camera equipment on campus. New installations by a contractor require pre-installation prints approved by AC&SS, and "as built" prints to AC&SS within ten (10) days of project completion.

For security purposes, all plans, drawings, and related information are designated confidential. No release of information is allowed without the consent of the Director of AC&SS. Violators are subject to University discipline and potential criminal charges.

Equipment Selection

All new installations will utilize AC&SS-specified cameras and AC&SS-specified recording devices. With the growth of the industry, specific equipment brand/model will be provided by the AC&SS video unit during the design/planning phase of the specific project.

Tests

An installer is expected to deliver a turn-key fully operational device and/or system with a fully functional tie-in to the University's existing enterprise-level system. The contractor/installer must be present during a scheduled final acceptance test by the AC&SS department. The Director of AC&SS must approve and sign-off on any device/system prior to its acceptance.

For existing equipment, the AC&SS Department will maintain a log indicating the last test of each camera and recorder.

General Prohibitions

General prohibitions include, but are not limited to:

1. Disabling or tampering with any University security device or security monitoring device, including CCTV equipment
2. Unauthorized access or use of CCTV software or systems
3. Physically relocating or re-positioning a fixed-lens camera
4. Covering or otherwise obstructing the lens of any camera
5. Installation or use of CCTV or any type video-capture equipment not pre-approved by AC&SS
6. Failure to comply with the University's Master Security Plan relating to CCTV
7. Authorizing or utilizing non-AC&SS staff for any type of service related to CCTV security equipment or systems

Exceptions & Appeals

If an individual or entity believes that they are adversely affected by this policy, they must submit in-writing a request for a specific exception to the Director of AC&SS within fifteen (15) days of the date they were affected. The Director of AC&SS may or may not grant an exception based on the best interest of the University.

Denial of an exception may be appealed in writing to the Executive Director of Campus Safety, who is the final decision authority. The response to the individual/entity will be within thirty (30) business days of receipt.

Requests for an exception or appeal must state at least the following:

- Name of affected individual and associated entity
- Contact information (mailing address, e-mail address, phone)

- Policy line(s) in question
- Cause of conflict
- Proposed remedy
- Resolution attempts

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