



# Video Documentation and Surveillance Policy

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## General Description

### Purpose:

The purpose of this policy is to regulate the installation and use of video documentation and surveillance (VDS) systems designed to allow observation and recording from cameras installed on university property. This policy does not imply or guarantee that the university will monitor cameras 24 hours a day, seven days a week. Cameras are NOT a guarantee of safety, but are tools that assist the university in overall security, serve as a deterrent against crimes and inappropriate or unlawful activity, as well as provide information to assist with incident investigations.

### Scope:

This policy applies to all students, faculty, staff, departments, divisions and colleges in the use of VDS systems. This policy applies to all forms of video documentation and surveillance, regardless of the technology employed, including closed circuit television (CCTV), Internet-based (Web) camera systems, and cameras used for academic or business purposes.

Academic cameras' sole purpose is viewing and recording academic activities and are not attached to the VDS system. Business camera's sole purpose is viewing and recording business activities, and attachment to the VDS system is required.

Camera systems installed expressly and specifically to enable teleconferencing among willing and fully informed participants are exempt from this policy.

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## Policy Content

### General Principles

1. Trinity University is committed to enhancing the campus' quality of life by integrating the best practices of public and private policing with state-of-the-art technology. VDS systems are a critical component of a comprehensive security plan using state-of-the-art technology.

2. The primary purpose of an integrated VDS system under the UPD is to deter crime and to assist the police in protecting the property of the university community and access to facilities and services. Any diversion of security technologies and personnel for other purposes that might compromise the viability of these resources for critical security goals is prohibited by this policy.
3. The university will only release information obtained through VDS when authorized by the Chief of Police following steps established in this policy.
4. Existing university policies, including policies related to non-discrimination and sexual harassment will govern VDS of public areas.

## Responsibilities

1. UPD is authorized to oversee and coordinate all university VDS uses. All university organizations that utilize VDS are responsible for implementing this policy in their respective operations. UPD has primary responsibility for disseminating the policy and assisting other units in implementing the policy and procedures.
2. The Chief of Police is responsible for authorizing all VDS at the university. All new installations and changes to existing camera systems must adhere to this policy and the university's network, hardware or software requirements for VDS systems.
3. UPD will monitor new developments in the relevant law and in security industry practices to ensure that the university's policies and practices relating to VDS systems are consistent with the highest standards, protections, and requirements of all federal, state, and local laws, and campus policies.
4. The Chief of Police must receive new requests for VDS installations and changes to existing camera systems prior to equipment purchase and installation. The Chief of Police will classify the proposed VDS camera location according to the criteria outlined in VDS Camera Installation Criteria. The proposed location of all VDS cameras must be consistent with the criteria outlined in VDS Camera Installation Criteria. The requesting department's chair and the VP of Academic Affairs must also approve academic activity cameras utilizing the VDS system.
5. UPD will maintain a list of all VDS camera locations, including a general description of the technology employed and the capabilities of the camera at each location. Information pertaining to camera location, camera view, camera models, visual capabilities, camera network infrastructure, planned tactical use, and camera and software configuration is confidential under the Texas Government Code Chapter 418, Emergency Management and may be exempt from public release under the Texas Open Records Act/Texas Public Information Act (Texas Government Code Chapter 552) or Freedom of Information Act (5 U.S.C. 552). This information is controlled, handled, transmitted, distributed, and disposed of according to the university's information management and disclosure policies and the Chief of Police must approve release to the public or other personnel who do not have a valid "need to know."
6. The Chief of Police will review all requests to release VDS systems recordings. No releases will occur without the Chief of Police authorization.

## VDS Code of Procedures

1. All persons involved in VDS will perform their duties in accordance with this policy.
2. Except in cases of covert VDS related to a criminal investigation, the university will post appropriate notice at the entrance to the area under surveillance or in close proximity to the camera installation site.
3. The university will configure documentation systems to prevent camera operators from tampering with or duplicating recorded information.
4. The university will store recorded video for thirty days and then erase it, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide uses as approved by the Chief of Police.
5. The university will store video media in a secure location with access by authorized personnel only.
6. Video surveillance operators who are granted access to archived recorded video must access footage with the approval of a supervisor to maintain the integrity of that video footage.
7. The supervisor of Communications or designee will train camera control operators/dispatchers in the technical, legal, and ethical parameters of appropriate camera use.
8. Video surveillance operators/dispatchers will monitor individuals solely based on suspicious activities or behavior, not individual characteristics protected by the university's non-discrimination and sexual harassment policies (race, gender, color, national origin, age, sex, religion, disability, veterans' status, or sexual orientation).
9. UPD will only use covert VDS for criminal investigation with the Chief of Police's approval. The vice president for Finance and Administration will receive notification of all covert VDS operations prior to or as soon as possible after deployment.
10. VDS is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

## Access to Live or Recorded Video Footage or Image by University Faculty and Staff

1. The Chief of Police or a designee may grant permission to UPD personnel to view or control a video camera, or to view the data captured by a VDS system. All other persons must request permission in writing from the Chief of Police stating the reason for and intended use of the requested data.
2. If access is granted to recorded footage by the Chief of Police, the supervisor of Communications will coordinate with the requestor to allow the requestor to view the requested footage or images. The supervisor of Communications shall document the date, time, and camera location of recorded video footage viewed by the requestor in a log that the requestor will sign, acknowledging the viewing.
3. Video footage from the VDS systems shall not be released, transferred, converted to alternate media, or otherwise provided to any person without the prior written permission of the Chief of Police.

## Evidence-Related Recordings

1. The Chief of Police will receive written notification of the transfer of recorded footage from the VDS system to alternate media for evidence usage in criminal or civil cases.
2. UPD will manage transferred recording from the VDS in accordance with state and federal laws pertaining to evidence handling and storage.
3. Individuals may no longer request access to recordings maintained for evidence purposes as described in this policy.
4. The Chief of Police or designee may release VDS footage and images to law enforcement agencies sharing jurisdiction with the University Police Department.

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## Performance Evaluation

### Consequences of Policy Violation:

Individuals will conduct VDS in a professional, ethical, and legal manner following appropriate training and with supervision in the responsible use of this technology. Violations of the VDS Code of Procedures (as defined in Section 05 below) may result in disciplinary action consistent with the rules and regulations that govern the behavior of the involved parties.

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## Terms & Definitions

### Terms and Definitions:

Term:	Definition:
VDS	Is the continuous or periodic observation or recording of campus activity to detect, deter, or obtain evidence of criminal or otherwise prohibited behavior. The university may also use VDS to observe and record academic or business activities if this function and use is consistent with this policy.
Covert Video	Is VDS conducted in secret with no visible evidence or warning of monitoring or recording activities. All video cameras are subject to covert use as described in Section 05.09 of this policy.
Video Surveillance Operator	Is any individual approved by the Chief of the University Police Department (UPD) to view or control a VDS camera, or to view or control the data captured by a VDS system.
Academic Activities	Are those teaching, learning, and assessment functions involved in the expansion or transfer of knowledge between or among students and faculty.
Business Activities	Are direct interactions between the university and its students, faculty, staff, alumni, and other constituencies, exclusive of academic activities.

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## Revision Management

### Revision History Log:

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### Vice President Approval:

Enter Vice President(s) that are responsible for approving this document

Name:	Title:
Gary Logan	Vice President for Finance & Administration