



UNIVERSITY OPERATING PROCEDURE

Title: Video Surveillance

Overview

The purpose of this University Operating Procedure (UOP) is to regulate, and establish procedures regarding, the use of video surveillance (“video surveillance systems” or “VSS”) for purposes of safety and security.

Applicability of the Procedure

This Operating Procedure applies to all members of the University community, including, without limitation, individuals who are faculty, staff, students, contractors, consultants, temporary employees, and affiliates of the University.

Definitions

System Owner: Approved department official responsible for monitoring the operation of a specific video surveillance system on University premises, with corresponding access rights to live and/or recorded surveillance footage from that system under the terms of this UOP.

University Premises: Buildings and grounds that are owned or controlled, via lease or other contractual arrangement, by the University of Vermont.

Video Surveillance Systems (VSS): A system that monitors and/or records a specific location or activity for safety and security purposes on University premises, which may include:

CATcard Operated Cameras: Cameras owned by the CATcard Service Center and operated on the UVM Network, the images from which may be transmitted to and viewed in real-time on a limited set of monitors, and for which recorded images are retained by the University and may be monitored under the terms of this UOP.

Exception Cameras: Cameras owned and operated by individual University departments, outside the centrally managed CATcard system, which were installed and in good working order prior to enactment of this UOP may continue in operation until the system malfunctions or is due for upgrade or replacement. Further exception may be approved by the Chief Privacy Officer, or designee.

Procedures

The Chief Safety and Compliance Officer, or designee, shall periodically, and at least once annually, assess where VSS are or should be installed for the purpose of protecting the campus safety and security. This assessment shall necessarily include the de-commissioning of VSS where there has been a change in use. The Chief Safety and Compliance Officer, or designee, shall also be responsible for reviewing, and approving or denying, any proposals for the installation of VSS submitted by University departments pursuant to the procedures set forth below.

Decisions as to installation or removal of VSS shall be made following consultation with other University offices as appropriate, including, but not necessarily limited to, UVM Police Services, the Office of the General Counsel, Compliance Services, Privacy Services, Risk Management, and Facilities Services. The Chief Safety and Compliance Officer, or designee, shall maintain a master inventory of all video surveillance cameras installed on University premises and a list of system owners who have access to the video surveillance system and its images.

Exceptions

This UOP does not apply to:

- Cameras used for the delivery of education in the classroom, lab, or similar setting, including as required for remote learning and educational assessment of performance based learning activities;
- Cameras used for research, as defined under federal law and governed by University policy involving human subjects;
- The use of video equipment for the recording of public performances, events, or interviews, or when permitted on campus for broadcast purposes in accordance with University procedures governing filming on-campus;
- Publicly accessible web-cameras with no recording capability for general use by the University (e.g., the Proctor Maple Research Center's "Foliage Webcam");
- Licensed banking operations on University property which are conducted in accordance with state and federal regulations; or
- Police operations, including use of body and vehicle mounted recording devices, hidden surveillance in connection with a criminal investigation, and access to CATcard Operated Cameras via live feed or viewing of stored images to the extent such access is in furtherance of event/premises security or an active investigation, respectively.

Departmental Request for a Video Surveillance System

Upon authorization by the appropriate dean or vice president, individual colleges, departments, programs or campus organizations wishing to install a VSS may submit a request to the Chief Safety and Compliance Officer, or designee, using the [Request for Installation of Video Surveillance System \(VSS\) Form](#), describing the proposed location, type of surveillance requested, and the purpose of the proposed installation.

Video Surveillance System Installation

The Chief Safety and Compliance Officer, or designee, shall promptly forward all approved requests for VSS (including those that the Chief Safety and Compliance Officer initiates) to the CATcard Service Center. Upon receipt of an approved Request for Installation of Video Surveillance System (VSS) Form, the CATcard Service Center, with the assistance of UVM Police Services, and/or Facilities, as necessary and desirable, shall oversee installation. VSS installed under the terms of this UOP shall be owned by the CATcard Service Center, but

shall be purchased by the individual units requesting their installation. In contrast, VSS installed on campus grounds, roads or walkways shall be centrally purchased and owned by the CATcard Service Center.

Existing cameras that are not operated by the CATcard Service Center shall be considered Exception Cameras for purposes of these Procedures. Exception Cameras may include those covered by the Vermont Library Patron Act, or others where a statutory or regulatory right of privacy may exist for individuals situated in view of the camera. Exception Cameras may continue to operate outside the VSS maintained by the CATcard Service Center until the system malfunctions or is due for upgrade or replacement, unless granted further exemption by the Chief Safety and Compliance Officer and the Chief Privacy Officer, or their designees. Exception Cameras must, however, be in compliance with all other elements of this UOP.

VSS installed and operated outside the bounds of this UOP will be removed by a CATcard Service Center technician and impounded by Police Services, when notified by the Chief Safety and Compliance Officer or the their designee.

Equipment and Network Maintenance

Troubleshooting, routine maintenance and minor repairs of VSS equipment and software will be handled by the CATcard Service Center on an inspection schedule reasonably designed to ensure that the VSS is functioning optimally. An annual fee per camera will be assessed toward these costs. Fees for cameras supporting units covered by the General Fund will be paid from a central account. Cameras located in facilities operating primarily as income/expense activities will have these fees assessed against those activities. Major repair or replacement of VSS will be charged to the department owning the equipment on a time and material basis. If departments require off-hour service, a special premium overtime charge to the requesting department may be levied by the CATcard Service Center.

Maintenance and repair of Exception Cameras is the responsibility of the system owner.

Video signals are transmitted over fiber owned and maintained by UVM Telecommunications and Network Services. Routine repairs to the network shall be the responsibility of that office.

The system owner of each VSS shall maintain a record containing the following:

- 1) Camera locations;
- 2) Dates/times of monthly equipment inspections;
- 3) Dates/times of system or camera problems noted;
- 4) Dates/times of repairs to system or cameras including work performed and by whom; and
- 5) Dates/times stored video is accessed, including purpose for viewing, names of those who were present, and if video was duplicated.¹

¹ While exempted from this UOP, access to CATcard Operated Cameras by UVM Police Services will be conducted using a single sign-on under the control of UVM Police Services, and the dates and times of access utilizing that log-in will be noted in a log maintained by the CATcard Service Center. If video is duplicated, the CATcard Service Center shall further note that in the log. The purpose of such access shall be identified as "Police Operations". More specific detail as to the nature of those Police Operations, and the name(s) of the officers viewing footage shall be contained solely within records maintained in the Police Services' incident management system, in accordance with established Department Operating Procedures. Such records shall be protected from disclosure in accordance with controlling law.

Placement of Video Surveillance Systems

All VSS cameras approved for use on University premises must be located so that personal privacy is maximized. Use of VSS in individual residence hall rooms, restrooms, locker rooms, individual offices, and non-lab classrooms is prohibited with respect to all surveillance within the scope of this UOP.

The use of mobile or hidden VSS may only be used pursuant to lawful surveillance procedures undertaken by an authorized law enforcement agency. Covert surveillance equipment may also be used for non-criminal investigations of specific instances which may pose a significant risk to public safety, security and/or property, as authorized by the Chief Safety and Compliance Officer and the Chief Privacy Officer, or their designees.

Video surveillance cameras shall not have audio recording capabilities, or, if available, audio recording capabilities shall not be enabled.

The installation of non-operational ("dummy") cameras on University premises is strictly prohibited.

Required Notice of Video Surveillance

Signs shall be posted at each entrance to areas accessible to the general public, strategically located in plain view, notifying individuals that they are under surveillance. The following language shall be used:

"This area is monitored 24hrs per day by a video surveillance system.

For questions, please contact UVM Police Services at 656-3473."

Additionally, where a new VSS installation is authorized for an area of restricted access, individuals who have been granted access or may reasonably be granted access thereto, must be provided with written notice by the system owner prior to the commencement of surveillance. Such notice should include:

- The placement and type of surveillance equipment being used, including the level of monitoring that will be in effect;
- The reason for surveillance of that area;
- A statement of the consequences for wrongdoing that is discovered via monitoring, which may include discipline by UVM or a report to law enforcement;
- Contact information to ask a question or report a problem with surveillance equipment;
- Contact information to report suspected wrongdoing, without fear of reprisal; and
- A copy of this UOP.

Security and Retention of Video Surveillance System Recordings

Surveillance records for VSS operated by the CATcard Service Center shall be stored in a central and secure location by the CATcard Service Center for a period of not less than thirty (30) days, and will be erased or written over as space is needed on the applicable server, unless retained as directed by the Chief Safety and Compliance Officer, or designee, following consultation with the Office of the General Counsel.

Surveillance records for Exception Cameras, which by definition are not operated by the CATcard Service Center, shall be stored by the system owner and retained pursuant to written protocols established by the system owner. Any request for release of surveillance records of an Exception Camera shall be reviewed by the Chief Safety and Compliance Officer, or designee, in consultation with the Office of General Counsel, to determine if the recording must or may be released in whole or in part.

Individual departments shall not store VSS recordings unless "Exception Camera" status is granted thereto by the Chief Safety and Compliance Officer, or their designee.

Requests for the retention of VSS records (CATcard Operated or Exception) beyond thirty (30) days shall be documented to ensure that preservation occurs in an efficient and effective manner.

All VSS records that have been retained pending the final outcome of an investigation shall be numbered, dated, and securely retained in a location to be determined by the Chief Safety and Compliance Officer, in consultation with the Chief of Police Services and the Office of the General Counsel, subject to the University's Records Management and Retention Policy. Preserved materials shall be destroyed in a secure manner as soon as they are no longer needed for which they were preserved, and their destruction shall be documented.

Monitoring and Accessing the Recordings of Video Surveillance Systems

This UOP does not imply or guarantee that VSS will be monitored in real-time.

All monitoring, recording and viewing of recorded activities shall be conducted in a manner consistent with state and federal law.

Violations of law or University policy discovered via VSS may result in sanctions relating to the individual's employment and/or student status, up to and including immediate termination in accordance with applicable University policy and/or civil or criminal liability.

VSS records that contain personal information used to make a decision directly affecting an individual shall be maintained in accordance with the University's Records Management and Retention Policy.

Release of Video Surveillance System Recordings

All requests or demands for access to recorded images captured by the University's VSS, regardless of whether the images were captured by a CATcard Operated or Exception Camera, including requests under the Vermont Public Records Act and all subpoenas, warrants, court orders, and other legal documents directing that access be afforded to law enforcement agencies or others, must be conveyed immediately to the Chief Safety and Compliance Officer, with a copy to the Office of the General Counsel.

Contacts

Questions concerning the daily operational interpretation of this UOP should be directed to the following:	
Title(s)/Department(s):	Contact Information:
Chief Safety and Compliance Officer	(802) 656-0219
CATcard Service Center	(802) 656-4509
Chief Privacy Officer	(802) 656-3086 privacy@uvm.edu

Forms/Flowcharts/Diagrams

- [Request for Installation of Video Surveillance System \(VSS\) Form](#)

Related Documents/Policies

- [Code of Conduct and Ethical Standards](#)
- [Code of Student Conduct](#)
- [Computer, Communication, and Network Technology Acceptable Use Policy](#)
- [Filming on Campus Procedure](#)
- [Personal Safety and Security Policy](#)
- [Records and Documents Requests Policy](#)
- [Records Management and Retention Policy](#)
- [Subpoenas, Complaints, Warrants, and other Legal Documents Policy](#)

Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

About This Procedure

Responsible Official:	Chief Safety and Compliance Officer	Approval Authority:	Chief Safety and Compliance Officer
Affiliated Policy Number(s):	V. 3.21.2	Effective Date:	May 8, 2017
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