

Policy Title:

Video Surveillance Policy

Background:

Clemson University seeks to provide a safety conscious and enriched environment for its students, employees and those visiting the campus. The use of video surveillance technology allows the public safety department to assess trends and foresee problems to increase their response time, to cover a larger portion of the campus and better utilize resources.

At the same time, there is a need to systematically protect the privacy of the members of the campus community when using video surveillance technology. A unified approach regarding where, when and what types of video surveillance are deployed, along with a proactive approach concerning how the system is to be used and by whom, will promote effective use of this technology at the university for safety and security purposes. Safety and security purposes include, but are not limited to:

- Protection of individuals, including students, employees, and visitors
- Protection of property, both university-owned and privately owned
- Patrol common areas and areas accessible to the public; and
- Investigation of criminal activity and/or disciplinary issues

This policy is intended to create a governance and usage structure for video surveillance at Clemson University, which will apply to all members of its community.

Purpose

The purpose of this policy is to serve as the governing document covering the installation, use and monitoring of any video surveillance device installed by and under the control of Clemson University, its employees, or any business-affiliated partner using such technologies on Clemson University property. It is not the intent of this policy to restrict departments from using video surveillance technologies for safety reasons within their respective areas but to establish a governance structure and guidelines for continued operational use. The intent is to promote the use of these technologies in a consistent, ethical and appropriate manner.

This policy does not in any way imply or guarantee that video surveillance devices will be indefinitely operational or actively monitored at any time. The presence of physical video surveillance does not in any way imply that activity is recorded or monitored.

Public areas will be defined as any portion of Clemson University's buildings or facilities that are accessible to the general public. Additionally, public area monitoring may extend to common areas of the campus where typically only members of the campus are reasonably expected to gather, and statutory law (e.g. hallways, building entrances and lobbies, etc.) grants no expectation of privacy. All privacy protections granted by law will be adhered to.

Scope

This policy applies to all facilities under control of Clemson University to include off-campus or affiliate sites where the university controls space within the facility. Reasonable efforts should be made with entities controlling non-Clemson owned facilities to ensure adequate and reasonable security will be provided for our students, employees, and visitors while occupying those facilities.

For purposes of this policy, webcams in scope are ones intended for use on official Clemson University websites, not ones used for personal video uses such as chat, experimental lab observation or video conferencing capabilities. Webcams personally owned and operated by individuals are not in scope, but still may subject the owner to statutory privacy and workplace laws when being used.

Privately owned cameras will be the sole responsibility of the user. Employees are to check with their supervisor before using personally owned or operated webcams in their workspace.

Video surveillance that is collected for purposes of established experimentation approved clinical observation or other related approved research is not subject to this policy. Video from those areas may be retrieved if determined to be relevant to an ongoing investigation. Approved research in which surveillance of human subjects is conducted must be completed in accordance to guidelines established by Clemson's Intuitional Review Board (IRB). Please refer to the Office of Research Compliance for approval of such research protocols.

Coverage Requirements

All video surveillance devices will be connected to the unified campus system unless otherwise approved by the Chief of Police.

All facilities considered to be within scope will be equipped with surveillance devices providing recorded coverage of, at a minimum, the following areas:

- Exterior approaches to and entrances to buildings,
- Public interaction areas which include, but are not limited to, main gathering space(s), departmental service/information desk, retail POS (points of sale), High occupancy, high traffic areas; and

- Parking and related pathways.

With respect to use by and risk to our campus community, consideration should be given to additional coverage in these areas.

- Main hallways
- Stair or elevator lobbies
- Stairwells
- Elevators
- Research/Laboratory spaces
- High value assets

The University Police will aid in identifying specific coverage areas and video surveillance devices for each facility and installation.

New construction and renovations will be required to follow the minimum coverage and the project assumes full responsibility for all costs associated with the installation.

Financial Responsibility

All video surveillance cameras will be connected to the enterprise video surveillance system will be administered in accordance with this policy. Systems found that are not part of the unified system, and that have not been approved, must be removed or transitioned to the unified system at the owners expense.

Capital projects and major renovations within scope of this policy must comply with the coverage requirements outlined above and assume full financial responsibility for video surveillance installations.

Departments assume financial responsibility for video surveillance installations above and beyond what the Chief of Police has identified. Costs typically consist of the camera, network connection, license, software maintenance agreements and installation of each device.

The Clemson University Police Department assumes no financial responsibility for the installation or maintenance of any video surveillance equipment installed.

Retention and Dissemination

Recorded video from the video surveillance system will be retained for a period to be determined by the Chief of Police. Exceptions to this requirement are recognized when program-specific federal regulatory standards require longer retention periods.

Any video recorded, collected or preserved in any manner is the property of Clemson University and cannot be released to external entities without the proper approval process established by the Chief of Police and/or Clemson University's Chief Public Information Officer. However,

nothing in this policy shall prohibit the University from complying with its obligations under the South Carolina's Freedom of Information Act or other applicable law.

Any diversion of video technology for any purpose other than safety or security concerns (e.g. monitoring of political or religious activities, personal gain, and general employee performance) is therefore prohibited by this policy. No video surveillance equipment will be installed for the sole purpose of covertly monitoring employee behavior in the absence of evidence pointing to criminal behavior involving a particular employee(s).

Recorded video will be stored on the unified video server or on approved network devices (servers) connected to that system unless distance to the individual Clemson University facility location makes use of the central storage system impractical. Locally installed servers must be able to meet the established retention standard.

In order to reduce the potential for valuable information being missed by inconsistently adjusted, or inconsistently functioning, motion detectors, all cameras will be set to record at a minimum frame rate of one (1) frame per second. If motion is detected the frame rate should be automatically adjusted to the maximum frame rate available for the device.

Monitoring

Video monitoring for security purposes will be conducted in a professional, ethical and legal manner and will not violate anyone's reasonable expectation of privacy. Cameras will not be installed in areas where there is a reasonable expectation of privacy. Personnel involved in video monitoring will be appropriately trained and regularly supervised in the responsible use of this technology.

Video monitoring of public areas for security purposes at Clemson University is limited to uses that are intended to be consistent with reasonable expectations of privacy. An individual's or a group's behavior may warrant specific monitoring with community safety in mind. However, no one will be selected for monitoring based on discriminatory criteria such as gender, race, sexual orientation, national origin or disability.

Covert video surveillance equipment may be used so long as such use is consistent with this policy and applicable law. Covert cameras will only be used to aid in criminal investigations and require approval of the Chief of Police.

Video surveillance equipment found to be illegal, installed without approval, or used in such a manner that violates any portion of this policy can and/or will be removed and/or confiscated under authority of the Chief of Police and at a cost to be billed to the violating department or individuals.

Process and Approval

Departments that desire to install, use, or monitor video surveillance equipment must first seek and be granted the appropriate approval by the Chief of Police or their designee and must adhere to all guidelines establish by the Chief of Police, designee or designee committee/council. It is the responsibility of the Chief of Police to establish and maintain approval and operational guidelines concerning the installation and continued use of video surveillance technologies.

Specific guidelines, and the approval process, for video surveillance installations are maintained via partnership among The University Police Department, Clemson Computing and Information Technology and Tiger One. More information can be found at

<https://www.clemson.edu/cusafety/cupd/>

If the device is an unmanned aerial platform or “Drone”, the user must also comply fully with Federal Aviation Administration regulations and all guidelines set forth by Clemson University’s Office of Emergency Management.

There will be signage in conspicuous places notifying the public that a video surveillance system is operating. There is an approved university-produced sign. These signs, or the design pattern for them, may be obtained from the Office of Physical Security within the Police Department.

Definitions

CCTV – Closed Circuit Televisions are video camera technologies used to transmit a signal to a specific place for viewing or recording that is not broadcast to the general public for consumption. Typically, these specific locations have a limited set of monitoring devices or recording devices designed for the sole purpose of observing or retrieving these images.

Legacy Video Surveillance Devices – Video surveillance systems that are subject to this policy, but were installed prior to the effective date of this policy and were not connected to the enterprise video surveillance system.

Video Surveillance Device – Camera or camera equipment used in the collection and/or monitoring of video imagery for the purposes of observing persons, places or things, primarily for safety or security purposes. These may include CCTV systems or web based cameras known as I.P. cameras or even webcams if so tasked.

Webcams - are video cameras designed to feed images in real time to a computer or computer network via USB, wired ethernet or through Wi-Fi enabled connections, some may feed real time imagery to webpages for viewing. Typically, the images are not recorded and the feeds are not monitored.

Communications (who needs to know, who does it affect or apply to)

All members of the Clemson University community (employees, students, and visitors) and any affected business associated partners of Clemson University.

Violations

All suspected violations of this policy should be reported to the Chief of Police or the Executive Vice President for Finance and Operations. In certain situations, other university, state, or federal representatives might be included in those investigations.

Exceptions

The Chief of Police and the Executive Vice President for Finance and Operations or designee may authorize variances from, or exceptions to, this policy that are consistent with the law and the University's efforts to foster campus safety.

Responsible Department/Division

Clemson University Police Department
Finance and Operations
Associate Vice President/Chief of Police Gregory Mullen