

**UNIVERSITY OF TENNESSEE, KNOXVILLE
CAMPUS PROCEDURE ON THE ACCEPTABLE USE OF VIDEO SURVEILLANCE EQUIPMENT**

1. Purpose	1
2. Procedure	1
2.1 Responsibilities.....	2
2.2 Responsibilities of Surveillance Oversight Committee (SOC)	2
2.2.1 Requests for Copies of Video Surveillance Records.....	3
2.3 Scope.....	3
2.4 General Principles.....	3
2.4.1 Placement of Video Surveillance Equipment	3
2.4.2 Access and Monitoring	4
2.4.3 Appropriate Use and Confidentiality.....	5
2.4.4 Exceptions.....	5
3. Procedures	5
3.1 Installation	5
3.2 Equipment Standard Specifications.....	6
3.3 Training	6
3.4 Operation	6
3.5 Storage and Retention of Recordings	6
4. Definitions	7
5. References	7
6. Approval and Revisions.....	7

1. Purpose

The University of Tennessee, Knoxville is committed to enhancing the quality of life of the campus community by integrating the best practices of safety and security with technology. A critical component of a comprehensive security plan is the utilization of video surveillance equipment. The use of video surveillance equipment is intended to deter crime and assist in protecting the safety and property of the UT community including investigative leads for past incidents. This procedure addresses one of the university’s safety and security needs while respecting and preserving individual privacy rights in accordance with the university’s core values and state and federal laws. This procedure is adopted to formalize procedures for the installation of video surveillance equipment and the handling, viewing, retention, dissemination, and destruction of video surveillance records. The existence of this procedure does not imply or guarantee that video surveillance equipment will be monitored in real time 24 hours a day, seven days a week. The University of Tennessee assumes no additional liability for campus safety as a result of utilizing video surveillance systems and/or making determinations of when it is/is not monitored in real time.

2. Procedure

2.1 Responsibilities

The University of Tennessee Police Department (UTPD), in conjunction with the Surveillance Oversight Committee (SOC), is responsible for implementation of this procedure. UTPD has the authority to select, coordinate, operate, manage, and monitor all campus video surveillance equipment pursuant to this procedure.

A Surveillance Oversight Committee (SOC) is an operational committee established by the Associate Vice Chancellor of Public Safety to oversee implementation and revisions of this procedure.

UTPD and OIT are responsible for advising units on appropriate applications of video surveillance equipment and for providing technical assistance to units preparing proposals for the purchase and installation of video surveillance equipment.

UTPD and OIT shall monitor developments in the law and in security industry practices and technology to ensure that the university's use of video surveillance equipment is consistent with the security industry's best practices and complies with all federal and state laws.

UTPD and OIT will review departmental proposals for video surveillance equipment installations and review specific locations of video surveillance equipment to determine that the perimeter of view of fixed location video surveillance equipment conforms to this procedure. Proposals for the installation of video surveillance equipment shall be reviewed by the Chief of Police or designee. The SOC will be responsible for reviewing and approving or denying all proposals for video surveillance equipment recommended by the Chief of Police.

The Chief of Police, or his/her designee, will review any complaints regarding the utilization of video surveillance equipment and determine whether this procedure is being followed. Appeals of a decision made by the Chief of Police, or his/her designee, will be made to and reviewed by the SOC. A department can appeal the decision of the SOC by requesting an appeal to the Senior Associate Vice Chancellor of Finance and Administration or his official designee with the option of a final appeal to the Chancellor.

2.2 Responsibilities of Surveillance Oversight Committee (SOC)

The SOC will be responsible for reviewing and approving or denying all proposals for video surveillance equipment installations recommended by the Chief of Police. The SOC also shall propose revisions to this procedure to the Vice Chancellor for Finance and Administration.

The SOC shall be comprised of the following members:

- The University of Tennessee Associate Vice Chancellor of Public Safety and Chief of Police or designee, Chair of the SOC
- Director of Administrative & Support Services (Finance & Administration) or designee
- Associate Vice Chancellor for Information Technology or designee
- Assistant Director University Housing or designee
- Associate Vice Chancellor for Facilities or designee
- Director of Emergency Management or designee
- Director of Athletic Facilities or designee
- Assistant Athletic Director Event Management or designee
- Assistant Director for Facilities Planning or designee

2.2.1 Requests for Copies of Video Surveillance Records

The Office of Communications & Marketing will process all external requests to release copies of video surveillance records in consultation with the Office of the General Counsel. Certain video surveillance records are confidential and protected from release under the Tennessee Public Records Act, Tennessee Code Annotated § 10-7-504(m). In addition, certain video surveillance records may be exempt from mandatory disclosure under the Freedom of Information Act. See 5 U.S.C. 522, 41 C.F.R. Part 105-60.

2.3 Scope

This procedure applies to all employees and units of the University of Tennessee, Knoxville in the use of video surveillance equipment on property owned or controlled by the University. All units using video surveillance equipment are responsible for implementing and complying with this procedure in their respective operations. All existing uses of video surveillance equipment shall be brought into compliance with this procedure by March 1, 2014. Note: Any existing CCTV equipment maintained by departments/units upon adoption of this procedure will not be required to replace such equipment. However, any equipment that needs replacing due to malfunction or new addition must adhere to the standards set forth herein. Unapproved or nonconforming video surveillance equipment will be removed by Facilities Services.

Video surveillance equipment may be installed in places where the security and safety of either property or persons would be enhanced by the installation of such equipment, including the interior and exterior of facilities. Video surveillance equipment will be limited to uses that do not violate an individual's reasonable expectation of privacy as defined by law. The functions of video surveillance equipment fall into four main categories:

- A. **Property Protection:** Where the main intent is to capture video and store it on a remote device so that if property is reported stolen or damaged, the video may show the perpetrator. Examples: an unstaffed computer lab, an unstaffed science lab, or a parking lot.
- B. **Personal Safety:** Where the main intent is to capture video and store it on a remote device so that if a person is assaulted, the video may show the perpetrator. Examples: a public walkway or a parking lot.
- C. **Extended Responsibility:** Where the main intent is to have a live video stream in one area monitored by a staff member in close proximity to the area. In this case video may or may not be recorded. Example: a computer lab with multiple rooms and only one staff.
- D. **Investigation of Criminal Activity:** The ability for law enforcement to review recorded or live video footage in relation to a criminal act. Example: Theft of a computer from a building or department.

2.4 General Principles

2.4.1 Placement of Video Surveillance Equipment

The locations where video surveillance equipment is installed may be restricted access sites such as a departmental computer lab; however, these locations are not places where a person has a reasonable expectation of privacy. Video surveillance equipment will be located in areas considered to be public access areas. Signage will be considered on a case by case basis to include language referencing the area being under surveillance for security purposes and may or may not be monitored.

Requests to utilize audio surveillance that does not comply with this requirement will be evaluated on a case by case basis by the SOC in consultation with the Office of the General Counsel.

Camera positions and views of residential building units shall be limited. The view of a residential housing facility shall not be greater than what is afforded by unaided, human vision. Viewing through the windows of private rooms is prohibited.

Unless the video surveillance equipment is being used for criminal investigations in accordance with law, monitoring by video surveillance equipment in the following locations is prohibited:

- Student dormitory rooms in the residence halls
- Bathrooms
- Single Occupancy Offices
- Locker rooms
- Health treatment rooms

The installation of “dummy” video surveillance equipment (i.e., equipment that do not operate) is prohibited.

Video surveillance equipment should be visible unless being used for criminal investigations, or non-criminal investigations of situations which may be a significant risk to public safety and security as authorized by the Chief of Police or designee.

UTPD will maintain an inventory of video surveillance equipment installed pursuant to this procedure.

2.4.2 Access and Monitoring

All recording or monitoring by video surveillance equipment shall be conducted in a manner consistent with university policies, state and federal laws, and will not be based on the subjects’ personal characteristics, including age, color, disability, gender, national origin, race, religion, or sexual orientation. Furthermore, all recording or monitoring will be conducted in a professional and legal manner.

With the exception of **Extended Responsibility** video surveillance equipment, video surveillance equipment are not monitored live under normal operating conditions but may be monitored live for legitimate safety and security purposes if approved by the Chief of Police or designee (e.g., high risk areas, restricted access areas/locations, in response to an alarm, special events, specific investigations).

For **Property Protection** and **Personal Safety** cameras, access to live video or recorded video from video surveillance equipment shall be limited to persons authorized by the Chief of Police or designee. For Extended Responsibility cameras, the live video can be monitored by the staff person responsible for the video surveillance equipment; however, any video recorded shall comply with the storage and retention requirements of this procedure.

When an incident is reported, the department or unit head responsible for the area in question may request the Chief of Police to review video surveillance records relating to an incident. As circumstances require, the Chief of Police may authorize others to review video surveillance records. The CCTV operating platform has a built in user access log to identify what activity has taken place for reference purposes. Nothing in this section is intended to limit the authority of UTPD in law enforcement activities.

2.4.3 Appropriate Use and Confidentiality

Video surveillance records are considered confidential and can only be used for official university and law enforcement purposes upon the approval of the Chief of Police or designee. Video surveillance records shall be handled with an appropriate level of security to protect against unauthorized access, alteration, or disclosure and in accordance with University of Tennessee System Policy IT 110, Acceptable Use of Information Technology Resources,

<https://universitytennessee.policytech.com/docview/?docid=157&public=true>,

and University of Tennessee System Policy IT0115, Information and Computer System Classification, <https://universitytennessee.policytech.com/docview/?docid=158&public=true>.

2.4.4 Exceptions

This procedure does not apply to video surveillance equipment used:

1. for instructional, academic, athletic, or artistic purposes;
2. for research that is governed by other policies involving human subjects or animals;
3. to record public performances or events, interviews, or other use for broadcast or educational purposes. Examples of such excluded activities would include videotaping of athletic events for post game review, videotaping of concerts, plays, and lectures, or videotaped interviews of persons.
4. to conduct University business or video conferences;
5. to monitor the use of automated teller machines (ATMs);
6. in health treatment settings governed by the Health Insurance Portability and Accountability Act (HIPAA);
or
7. to conduct an audit or law enforcement investigation, or in accordance with a court order.

3. Procedures

3.1 Installation

Units seeking approval for installation of video surveillance equipment shall submit a written request to their appropriate dean or vice chancellor describing the proposed location of the video surveillance equipment, justifying the proposed installation, providing a cost estimate, and identifying the funding source or sources for purchase and ongoing maintenance. The official written request form can be located on this website.

- The Vice Chancellor or dean will review the request and recommend it to the Chief of Police, if appropriate.
- The Chief of Police or designee will review all proposals from deans and vice chancellors. Upon completion of review of the project, the Chief of Police will forward the proposal to the SOC with a recommendation.

- The SOC will be responsible for reviewing and approving or denying all proposals for video surveillance equipment recommended by the Chief of Police. The SOC will provide a written response to the unit's request no later than sixty (60) days from the date of submittal to the Chief of Police.

OIT Communications shall oversee the installation of all approved video surveillance equipment with the assistance of the UTPD, OIT, and Facilities, as required. OIT Communications will also work on identifying a centralized storage program which will reduce the overall upfront costs to departments and the need to locate multiple NVRs across the campus.

Purchasing will not accept, approve, or process any order for video surveillance equipment without the approval of the SOC.

3.2 Equipment Standard Specifications

The type of video surveillance equipment and operating platform units shall use is Avigilon. All information pertaining to specific products (cameras, video recorders, etc.) can be viewed at www.avigilon.com. Any approved equipment purchase exceeding \$5,000 shall follow Fiscal Policy FI0410. Exceptions to the specified equipment standard shall be reviewed and approved by the SOC. The minimum standards for department/unit use are as follows:

- 2 MP fixed Avigilon camera should be the minimum standard for most applications with 10 images per second (IPS).
- 3 MP, 5 MP, and 7 MP Avigilon cameras should utilize no less than 7 images per second (IPS).
- All purchases should conform to the Enterprise licensing version of Avigilon.

3.3 Training

Video surveillance equipment control operators shall be trained in the requirements of this procedure and the technical, legal, and ethical parameters of appropriate video surveillance equipment use. Training will be provided by UTPD personnel or online tutorials offered by the manufacturer.

Video surveillance equipment control operators shall receive a copy of this procedure and provide written acknowledgement that they have read and understood its contents. Confirmation of adherence to this procedure should be provided by authorized departmental users on an annual basis.

3.4 Operation

Video surveillance will be conducted in a manner consistent with this procedure and all other university policies.

Video surveillance equipment control operators shall monitor based on suspicious behavior, not individual characteristics.

3.5 Storage and Retention of Recordings

No attempt shall be made to alter any part of any video surveillance recording. Surveillance centers and monitors will be configured to prevent video surveillance equipment operators from tampering with or duplicating recorded information.

Video surveillance records shall not be disseminated by individual units. All video surveillance records shall be stored in a secure university centralized location for a period of no less than 14 days and will then promptly be erased or written over as storage limits are exceeded, unless retained as part of a criminal investigation or court proceedings (criminal or civil), as part of another bona fide use as approved by the Chief of Police, or in response to a preservation request issued by the Office of the General Counsel. Individual units shall not store video surveillance records. Storage of video surveillance records and access control for stored records will be centrally managed to ensure appropriate security.

An electronic user log is maintained in the current CCTV operating platform. The log shall include the date and identification of the person or persons to whom access was granted.

4. Definitions

“Unit”: Any administrative, academic, or research unit of the University of Tennessee, Knoxville.

“Video surveillance equipment”: devices used to observe and record a single image (still, snapshot, photograph), a number of single images per time period (stop action, time laps), or multiple images (motion, video) for the purpose of surveillance. This term does not include cell phone cameras or University webcams.

5. References

University of Tennessee System Policy IT 110, Acceptable Use of Information Technology Resources
<https://universitytennessee.policytech.com/docview/?docid=157&public=true>.

University of Tennessee System Policy IT0115, Information and Computer System Classification
<https://universitytennessee.policytech.com/docview/?docid=158&public=true>.

6. Approval and Revisions

All revisions and approvals to this campus procedure will be considered and finalized by the Chancellor’s Cabinet as needed.