



USE OF SECURITY CAMERAS

1. Purpose

The Department of Safety and Security (DSS) has been given authority and responsibility to oversee and regulate the use of security cameras at the University of Chicago. The University uses security cameras to monitor and record activity to improve safety and security at the University. This policy outlines the principles for the University's use of security cameras and expresses the University's commitment that such use be responsible and appropriate.

2. Scope

This policy applies to properties that are controlled and operated by the University and located within the University's Hyde Park Campus or greater Chicagoland area. DSS is responsible for overseeing and regulating the use of security cameras on such properties, and all other members of the University community are prohibited from using security cameras without approval from DSS.

3. General Principles

- A. DSS follows sound and experience-based practices in use of security cameras.
- B. Campus safety personnel monitor public areas to deter crime and to protect the safety and property of the University community. The University strictly prohibits any diversion of security technologies and personnel for other purposes (*e.g.*, monitoring of political or religious activities, or employee and/or student evaluations).
- C. The decision to deploy security cameras and the specific placement of those cameras falls under the authority of DSS. DSS will take into account factors, including mitigating risks, vulnerabilities, and acts and patterns of criminal behavior when selecting camera locations. When developing strategies for camera installation and placement, DSS conducts security surveys, risk analyses, and threat assessments to individual buildings, "zones" and the University community as a whole.

- D. This information is also critical in determining the types of equipment and/or features most appropriate for each situation, including Pan, Tilt Zoom (PTZ) cameras, fixed cameras, color, night, day/night cameras, license plate recognition, video analytics, etc.
- E. Video monitoring for security purposes will be conducted in a manner consistent with this policy and the law. Personnel involved in video monitoring will be appropriately trained in the responsible use of this technology and will receive ongoing supervision.
- F. Staff, Faculty, Other Academic Appointees, Postdoctoral Researchers, Students, Vendors, Contractors, and Visitors are prohibited from using security cameras without approval from DSS. For example, an individual or department installing a security camera without authorization from DSS would be in violation of this policy. Violations of procedure referenced in this policy will result in disciplinary action consistent with applicable policies and/or labor contracts.
- G. Information obtained through video monitoring will be used exclusively for security, health and safety, law enforcement purposes, defending the University against threatened or pending legal claims, and in connection with investigations related to allegations of conduct contrary to the law or University policy.
- H. Other than (i) day-to-day and general video safety and security monitoring conducted by DSS and other University security personnel (e.g., by a front desk attendant whose job responsibilities include viewing security camera feeds) and (ii) the review and use of stored or live video in connection with investigations into workplace injuries or allegations of conduct contrary to the law or University policy, DSS will not use camera technology to monitor Staff, Academic Appointees, Postdoctoral Researchers, Students, Vendors, Contractors or other Visitors. With regard to the use of camera technology to support an investigation into possible violations of University policies, all requests by University personnel to DSS must be accompanied by a written complaint, report, memo, email or other correspondence that describes (i) the nature of the underlying circumstances, (ii) the University policy that is at issue, (iii) the specific video needed and its relationship to the investigation, and (iv) whether the information sought from the video monitoring could be reasonably and timely obtained using other means. For all such requests, DSS will seek permission to release the requested security footage from the Office of Legal Counsel to ensure legal and policy compliance. The Office of Legal Counsel may, as appropriate, discuss any such request with, and seek guidance from, University Human Resources and/or the Office of the Provost regarding whether to grant the request. In evaluating the request, the University's Office of Legal Counsel will consider the above factors, as well as any other factors that bear on the use of the requested video and the potential impact on the University community. The Office of Legal Counsel may authorize, reject or tailor the request.
- I. Video monitoring of public areas for security purposes will be conducted in a manner consistent with existing University policies. For example, this policy prohibits monitoring

persons because of their legally protected status outlined in the University's Policy on Harassment, Discrimination, and Sexual Misconduct (e.g., race, gender, sexual orientation, national origin, disability).

- J. University cameras shall not make audio recordings.

4. Responsibilities

- A. DSS is authorized to oversee and coordinate the use of camera installation and monitoring for safety and security purposes at the University. DSS also has the primary responsibility for disseminating and implementing policy and procedures related to the operation and use of security cameras.
- B. Legitimate safety and security purposes include, but are not limited to, the following:
 - a. Protecting community members, buildings and property*
 - b. Monitoring access control systems*
 - c. Verification of security alarms*
 - d. Video patrol of public areas*
 - e. Investigations into alleged violations of law or University policy, subject to the procedures outlined in Sections 3(G) & 3(H).*
 - f. Pedestrian safety*
 - g. Special event security*
- C. DSS will monitor legal developments and industry practices to ensure that camera monitoring and recording at the University are consistent with best practices and contemporary standards.
- D. DSS will periodically review camera locations to ensure the view of fixed location cameras conforms to this policy.
- E. DSS will audit camera monitoring operations, including video media storage, and make changes to operational procedures as necessary to ensure that standards and operations conform to this policy.
- F. The Associate Vice President for Safety and Security (AVP) oversees DSS. The AVP or their delegate will review the locations of temporary cameras to be used for special events for approval before the event. (Note: "temporary cameras" does not include mobile video equipment or surveillance cameras that are temporarily installed for criminal investigation purposes.) The AVP or their delegate will also review all requests received by DSS to release recordings obtained through camera recording to a third party. No release of recordings will occur without written authorization by the AVP or their delegate except in accordance with official requests for digital video directly related to a criminal investigation, arrest or subpoena. The AVP or their delegate may also

approve the release of recordings for legitimate purposes, such as to protect the University and its community from lawsuits or other harm. The AVP or their delegate will consult the University's Office of Legal Counsel in these cases prior to the release of recordings.

- G. Members of the University community who are concerned about camera placement may petition the AVP in writing to forgo the installation of a proposed camera or for the removal of an existing camera. The request should identify the location/proposed location of the camera(s) and detail the basis for the request. The AVP or their delegate will consider the petition and make a reasonable determination regarding the propriety of foregoing the installation of, or removing, existing camera(s), weighing the concerns of the person(s) making the requests, the reason for the placement or proposed placement of the camera, and the overall safety and security of the community. In making this determination, the AVP or their delegate, in consultation with the University's Office of Legal Counsel, also will consider whether the camera(s) at issue comply with this policy. The AVP or their delegate will provide a written response to the petitioner.

5. Procedures

- A. All operators and supervisors involved in video monitoring will perform their duties in accordance with this policy developed by the Department of Safety & Security.
- B. DSS will supervise operators involved in video monitoring and ensure that they receive training on security cameras and practices.
- C. DSS will not place cameras in, or allow camera views of, areas reasonably considered to be private. These areas include: residence hall rooms; bathrooms; shower areas; locker and changing rooms; areas where a reasonable person might change clothing; private offices and views into private homes. Additionally, rooms used for medical, physical, or psychological therapy or treatment are considered private under this policy.
- D. Cameras shall be placed overtly in public spaces with the exception of camera placements that have been authorized for investigative purposes of the UCPD.
- E. In most cases, recorded video media will be stored for a period of not less than 30 days and will not exceed 60 days. The storage duration is based on configuration settings in the recording device. An exception is video retained as part of a criminal investigation or court proceeding (criminal or civil), or other bona fide use permitted under this policy. Images saved for these purposes may be recorded to approved digital storage devices or media storage devices in accordance with applicable law.
- F. DSS will configure systems to prevent camera operators from tampering with or duplicating recorded information.

- G. Operators will be trained in the technical and legal parameters of appropriate camera use.
1. Operators will receive a copy of this policy and provide written acknowledgement that they have read and understood its content.
 2. Operators will receive training in cultural/diversity awareness.
 3. Operators will not monitor individuals because of race, gender, ethnicity, sexual orientation, disability or other protected class covered by the Policy on Harassment, Discrimination, and Sexual Misconduct. Camera control operators will monitor behavior, not individual characteristics.
- H. Mobile or portable video equipment may be used in criminal investigations, when authorized by the AVP or Chief of Police. Mobile or portable video equipment may also be used during special events when there may be a significant risk to public safety or security and when the use is authorized by the AVP or Chief of Police.
- I. The use of in-car and body-worn cameras is not covered by this policy and instead is covered by University of Chicago Police Department general orders, which are available to the public at the following link: <https://www.powerdms.com/public/uocdo/tree>

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