

3359-11-25 Use of video surveillance on campus.

(A) Purpose.

The purpose of this rule is to standardize the use of video surveillance cameras at the university of Akron. This rule places the responsibility for approval, placement, and monitoring of all video surveillance cameras under the control of the university of Akron police department (UAPD), which will assist the UAPD in its response to safety and security issues on university property.

This policy does not apply to the use of video or visual surveillance, monitoring or recording, covert or otherwise, by the university of Akron police department (UAPD) during criminal investigations or as authorized by a court of law, or legitimate academic uses of video cameras for academic or research purposes.

(B) Definitions.

- (1) Camera means any item, system, technology device, or process, used alone or in conjunction with a network, for the purpose of gathering, monitoring, recording or storing an image or images. Images may be viewed in real-time and/or captured and preserved for possible review at a later date.
- (2) Monitoring is the process of observing or reviewing images that are captured by video surveillance either in real-time or that have been pre-recorded and are reviewed at a later date and time.
- (3) Recording is the process of capturing images resulting from video surveillance and saving those images to a storage medium.
- (4) University property means all land, structures, or other real property owned, operated, leased or controlled by the university of Akron. This includes both internal and external areas, including but not limited to common spaces, grounds, parking lots.
- (5) Internet protocol (IP) is the communication protocol used in the collection and transmission of images on the network. All surveillance devices shall utilize open internet protocols and standards.

- (6) Public areas are defined as any portion of university property that is operated and controlled by the university of Akron, including buildings and facilities, in which a person does not have a reasonable expectation of privacy.
- (7) Private areas are defined as any portion of university property where a person would have a reasonable expectation of privacy e.g. restrooms, dorm rooms, offices, locker rooms, or any other clothing changing area.
- (8) Restricted access areas are defined as university property that is not accessible to the general public. Restricted access areas may be accessible to university employees, but does not include Private areas.

(C) Procedures.

- (1) Any and all requests for use of video surveillance cameras will be made in writing to the university of Akron chief of police. The request will include the name of the college or department making the request, the purpose or reason for the camera, and the desired installation area. UAPD will review each proposal and recommend specific camera installations as dictated by institutional needs and current technological standards. The review will consider security issues, institutional needs, technological standards, installation, wiring, networking, licensing, and cost. The chief of police will make the final decision on new camera installations.
- (2) Any cameras currently in place as of the date of this rule will come under the control and authority of UAPD. UAPD will determine if the cameras currently in place meet with the institutional needs of the university and meet with current technological standards for a centralized monitoring and recording system. UAPD will determine if any new cameras are permitted or if any current cameras are to be removed. No cameras are permitted unless they are recorded by UAPD or a specific exception is permitted by UAPD. If an exception is permitted, the college or department will be required to comply with this rule for the exempted cameras and provide a contact person to UAPD.

- (3) All recording devices, where able, will utilize IP technology to transmit images and recordings, unless an exception is granted by UAPD. All legacy recording technology currently in use at the university of Akron will be converted to IP-based technology within twelve months from the date of this rule, unless an extension is granted by UAPD. Legacy systems will not need to replace analog cameras, but will be able to replace digital video recorders with IP converters which will forward images to the centralized storage operated by the department of information technology. Digital video recorders will be removed by UAPD for internal use or sent to surplus property for disposal upon conversion to the IP system.
- (4) UAPD will permit authorized persons to monitor and/or review images captured by the cameras, which may include the department or college, safety personnel, or other authorized university of Akron employees. Monitors for video surveillance cameras will be installed in restricted access areas and shall not be viewable by unauthorized persons, unless an exception is granted by the UAPD.
- (5) Each department or college with video surveillance equipment will maintain a departmental contact who will be the contact person with the university regarding the camera. Department or college contacts are required to provide a list of authorized monitors in the department or college at the beginning of spring and fall semester.
- (6) Each department or college will be responsible for the cost of the cameras, equipment, and installation.
- (7) Cameras will only be permitted to be placed in public or restricted access areas and on university property. Cameras will not be placed in private areas or in a public area to view into private areas.
- (D) Retention and release of information.
 - (1) Retention of all recorded information is the responsibility of UAPD except in the case of exceptions as granted.

- (2) Image files will be retained in a secure location and kept for a minimum of thirty days and up to a maximum of ninety days as determined by UAPD. Specific image files may be required to be kept for a longer period at the direction of the office of general counsel or UAPD.
- (3) Recordings with information about a specific student are considered law enforcement records unless the university uses the recording for discipline purposes or makes the recording part of a student's education record.
- (4) A log shall be maintained by UAPD of all instances of access to or use of image files. The log shall include the date and identification of the authorized person or persons to whom access was granted.
- (5) Requests for image files from persons not authorized to access ~~to~~ the system will be reviewed by the office of general counsel or the university of Akron chief of police and if approved, the files will be distributed in an appropriately secured method. A log shall be maintained by UAPD indicating the date and time range of the files, camera views, and the identification of the person receiving the files.
- (6) The video images are considered security records under section 149.433 of the Revised Code, because they are used to protect and maintain the security of the university. A record kept by a public office that is a security record is not a public record under section 149.43 of the Revised Code and is not subject to mandatory release or disclosure under that section. Any record requests, including subpoenas, will be directed to the office of general counsel for a response.

Effective:

Certification:

Ted A. Mallo
Secretary
Board of Trustees

Prom. Under: 111.15

Stat. Authority: 3359.01

Rule Amplifies: 3359.01

Prior Effective Dates: