

# OAKLAND UNIVERSITY

## ADMINISTRATIVE POLICIES AND PROCEDURES

### 674 SURVEILLANCE AND MONITORING TECHNOLOGY

**SUBJECT:** SURVEILLANCE AND MONITORING TECHNOLOGY

**NUMBER:** 674

**AUTHORIZING BODY:** VICE PRESIDENT FOR FINANCE AND ADMINISTRATION

**RESPONSIBLE OFFICE:** OFFICE OF THE CHIEF OF POLICE

**DATE ISSUED:** MAY 2006

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**RATIONALE:** Oakland University (“University”) is committed to enhancing the campus quality of life by integrating the best security practices with state-of-the-art technology.

The purpose of Surveillance Monitoring or Recording of University Facilities, as those terms are defined below, is to deter crime and to assist the Oakland University Police Department (OUPD) and the University in protecting the safety and property of the University community. The purpose of the policy is to regulate the use of Surveillance Devices and Surveillance Monitoring or Recording to protect the legal and privacy interests of the University and the University community.

**POLICY:** The University’s use of Surveillance Devices for Surveillance Monitoring or Recording will be performed in a professional, ethical, and legal manner. Surveillance Devices will only be installed with the advance approval of the President or appropriate Vice President, Associate Vice President for Facilities Management, and Chief of Police. Only authorized personnel, as determined by the President or appropriate Vice President, will be involved in, or have access to, Surveillance Monitoring or Recording results.

**SCOPE AND APPLICABILITY:** This policy applies to all University personnel, schools, divisions and departments in the use of Surveillance Devices on University

Facilities, and the conduct of Surveillance Monitoring or Recording. This policy does not apply to the use of Surveillance Devices, or the conduct of Surveillance Monitoring or Recording, or any type of monitoring, covert or otherwise, by the OUPD during criminal investigations, or in legitimate academic uses of Surveillance Devices that have been approved by the University's Institutional Review Board for the Protection of Human Subjects. This policy does not apply to academic examination proctoring services that utilize technology to monitor and/or record students as they take examinations.

## **DEFINITIONS:**

***Surveillance Device:*** Means any item, system, camera, technology device, communications device, or process - used alone or in conjunction with a network - for the purpose of gathering, monitoring, recording or storing an image or images of University Facilities and/or people in University Facilities or location based data.

Images captured by Surveillance Devices may be real-time or preserved for review at a later date. Such devices may include, but are not limited to, the following:

- i. Close circuit television
- ii. Web devices
- iii. Real-time surveillance systems
- iv. Computerized visual monitoring
- v. Mobile or wearable technology with cameras

***Surveillance Monitoring or Recording:*** Means the process of using a Surveillance Device to observe, review or store visual images for purposes of deterring crime and protecting safety and security.

***University Facilities:*** Means all University areas on University owned, leased or controlled property, both internal and external, and includes offices, common spaces, labs and all other areas.

## **PROCEDURES:**

Installation and/or placement of Surveillance Devices in University Facilities must be pre-approved by the President or the appropriate Vice President, Associate Vice President for Facilities Management, and Chief of Police. Only University personnel designated by the President or the appropriate Vice President shall have access to the images captured by Surveillance Monitoring or Recording. The designated

personnel will be appropriately trained in the responsible use of this information and technology through a training program offered by the OUPD. Violations of these procedures may result in disciplinary action in accordance with the policies, contracts, rules and regulations governing University employees.

The conduct of Surveillance Monitoring or Recording, and the use of Surveillance Devices, must be in a manner consistent with all University Administrative Policies and Procedures.

The conduct of Surveillance Monitoring or Recording, and the use of Surveillance Devices at the University are limited to uses that do not violate a person's "reasonable expectation of privacy", as that term is defined by law.

Network connectivity for Surveillance Monitoring or Recording must comply with University Policy #850 Network Policy.

### **Retention and Release of Information**

Images obtained through Surveillance Monitoring or Recording must be secured inside a Data Center that is under the control of University Technology Services (UTS) for a length of time deemed appropriate for the purpose of monitoring, but not to exceed 90 days, unless such images have historical value, or are being used for a criminal investigation. Any questions regarding the retention of these images should be directed to the Chief of Police.

All requests from within the University for the release of information and results obtained through Surveillance Monitoring or Recording must be approved by the Chief of Police.

All requests from sources external to the University for the release of information and results obtained through Surveillance Monitoring or Recording must be submitted to the Office of Legal Affairs (OLA) for approval and will only be released in accordance with the law.

Information obtained in violation of this policy shall not be used in any disciplinary proceeding against any University employee or student.

### **REVIEW PROCESS FOR NEW DEVICES**

All new requests for Surveillance Devices must be submitted in writing to servicedesk@oupolice.com. A representative from the OUPD will assist with an assessment and site survey before obtaining necessary approvals. Once all approvals have been obtained, a quote will be provided by the University's current security systems vendor.

The Associate Vice President for Facilities Management and Chief of Police will

review new Surveillance Device locations to ensure that the placement of fixed location Surveillance Devices conforms to this policy. Temporary locations or casual monitoring must be approved in advance by the Associate Vice President for Facilities Management and Chief of Police.

The President, or the President's designee, will review complaints regarding Surveillance Device locations and determine whether the policy is being followed. The President, or the President's designee, will consider all relevant factors including without limitation, whether the potential benefit in community security outweighs any possible infringement of individual privacy, and the benefits and implications of monitoring guests as well as University students, faculty and staff.

Annually, the Chief of Police will establish a review committee that consists of one faculty member and one staff member. A list of surveillance equipment approved during the previous 12 months will be presented to the review committee who will ensure that all aspects of policy 674 were followed and approvals were obtained. The role of the committee is consultative only.

The OLA will provide guidelines for signs with standard language for placement in those areas where Surveillance Monitoring or Recording is done, as appropriate.

The Chief of Police will review this policy periodically and recommend appropriate revisions in accordance with approved procedures for establishing University policy.

**RELATED POLICIES AND FORMS:**

University Policy #850 Network Policy

**APPENDIX:**