

ADMINISTRATIVE POLICIES AND PROCEDURES

SUBJECT: SURVEILLANCE AND MONITORING TECHNOLOGY

NUMBER: 674

AUTHORIZING BODY: VICE PRESIDENT FOR FINANCE & ADMINISTRATION

RESPONSIBLE OFFICE: OFFICE OF THE CHIEF OF POLICE

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RATIONALE: Oakland University (University) is committed to enhancing 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 University Vice President, and the Surveillance Review Panel formed under section VI of this policy (Panel). Only authorized personnel, as determined by the President or appropriate University Vice President and the Panel, 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.

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. Closed circuit television
- ii. Web devices
- iii. Real-time surveillance systems
- iv. Computerized visual monitoring
- v. Cell phones 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 Panel and the President or the appropriate Vice President. Only University personnel designated by the Panel and 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 Oakland University Police Department. The designated personnel will also be supervised by a specific supervisor, with periodic review performed by the Panel. 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 retained by the department sponsoring the authorized Surveillance Devices 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 Panel.

Information and results obtained through Surveillance Monitoring or Recording will only be released when authorized by the Panel.

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 General Counsel's Office for approval prior to release.

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

Surveillance Review Panel

A Surveillance Review Panel comprised of the following members will be established:

- Dean of Students
- Assistant Vice-President, University Human Resources
- Chief Information Officer, University Technology Services
- One faculty member selected by the Provost
- One faculty member selected by Senate Steering Committee
- Chief of Police, OUPD (Chair)

All new requests for Surveillance Devices must be submitted in writing to the Panel (through the OUPD) for approval prior to purchase and/or installation of Surveillance Devices.

The Panel will review existing or 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 Panel.

The Panel will review complaints regarding Surveillance Device locations and determine whether the policy is being appropriately followed. The Panel 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.

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

The Panel will review emerging technologies to determine their applicability within the University environment.

The Panel will review all requests from various University entities to release recordings obtained through Surveillance Monitoring or Recording. Such requests must be submitted to the Panel through OUPD.

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

RELATED POLICIES AND FORMS:

APPENDIX: