



Resolution #2
of the 2016-2017 Session

Student Feedback on the Policy for Implementation of Security Cameras on Campus

Introduced by

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Monday, September 12, 2016

Passed on

Monday, September 26, 2016

GRIFFIN THOMAS, Student Association President, 2016-2017

Presiding Officer

Whereas, the safety of Rice students is a priority for administration, the Rice University Police Department (RUPD), and the student body;

Whereas, the Rice University Police Department Mission Statement states, “The mission of the Rice University Police Department is to provide a safe and secure environment so as to further the education process”, including “the creation of a maintenance of a feeling of security in the community” and “the establishment of effective crime prevention programs”;

Whereas, residential college leadership have recently reported a reduction in their constituents’ sense of security on campus;

Whereas, residential colleges, specifically South Colleges, have experienced an increase in suspicious persons activity;

Whereas, RUPD has proposed the installation of security cameras around the boundaries of residential college buildings as a preventative and reactionary measure to criminal activity;

Whereas, despite the security that cameras would provide, students are still have concerns about the installation of security cameras, including:

- Potential right privacy breaches resulting from security camera placement
- A loss of the cultural liberty in the colleges that might result from surveillance
- A lack of clarity on the process to be undertaken for different university parties (RUPD, SJP, U-Court, etc.) to access the footage
- Potential for future misinterpretation of the agreed-upon policy as a result of nonspecific language in the policy
- The cybersecurity of the footage recorded by security cameras;

Whereas, RUPD has released drafts of the policies that will govern the use of security cameras, “Security Camera Acceptable Use Policy” and “RUPD Security Camera Procedures” policy, and requested feedback from the student body; and

Whereas, a committee of student leaders collected feedback from the undergraduate community and discussed corresponding policy changes with relevant administrators; therefore, be it

Resolved, that the Student Association is in favor of the installation of security cameras around the periphery of the residential colleges, provided that RUPD implements a comprehensive policy that upholds the following priorities:

- Effectiveness
 - That the cameras serve to keep the campus community safe both in prevention of and in reaction to criminal activities
- Privacy
 - That the cameras shall not infringe upon private spaces and shall not negatively impact college culture
- Transparency
 - That the physical cameras and their implementation shall be treated in a manner that maintains a sense of trust between the student and the administration
- Security/access
 - That the cameras shall be technologically secure and will not be vulnerable to hacking or infiltration
- Continuity
 - That the policy shall be written in such a way that its spirit will remain in effect for future administrations
- Accountability
 - That there shall be systems in place to ensure the proper execution of the policy
- Specificity
 - That the policies governing the use of these cameras shall use specific and precise language in all occasions possible (suggestions are provided in Appendices A and B);

Resolved, the Student Association recommends that the RUPD “Security Camera Acceptable Use Policy” include a preamble that elaborates the spirit of the policy. The Student Association recommends the following language:

“Rice’s unique and unrivaled culture is predicated on mutual trust between all stakeholders of the University. The primary purpose of this policy is to ensure the safety of the Rice community, however the spirit of this policy is to maintain that safety while also respecting the privacy of its members as to strengthen the bonds of trust.”;

Resolved, that based on conversations between student leadership and administrators including Chief of Police Johnny Whitehead, Vice President of Administration Kevin Kirby, and Dean of Undergraduates John Hutchinson, the Student Association recommends that the following major changes be made in the policies:

- **Security Camera Acceptable Use Policy:**
 - **Section 4 Clause A:** Specify that the Chief of Police and the Security Systems Manager consult with each residential college’s government on the placement of security cameras.
 - **Section 4 Clause B:** Define “common spaces” such as a residential college commons and break rooms that, while not private, should be subject to special considerations before cameras are placed within them
- **RUPD Procedure Policy:**
 - **Section 4 Clause C:** Revise to describe a more organized process than “randomly review[ing] camera recordings” for ensuring policy compliance.
 - **Section 4 Clause M:** Define in a more specific manner the instances in and extent to which cameras might be viewed “live or in real-time” and in particular give more specific context to the use of the term “limited.”
 - **Section 4:** Elaborate on the repercussions for violations of the policy; and

Resolved, that the Student Association also recommends that the policies be amended to make the changes shown as footnotes in the policies, attached as Appendices A and B.

RICE UNIVERSITY
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Appendix A: Security Camera Acceptable Use Policy

RICE UNIVERSITY POLICY NO. _____

SECURITY CAMERA ACCEPTABLE USE POLICY

1. GENERAL POLICY

Rice University is committed to enhancing the quality of life by integrating the use of technology into its safety and security program. A key component is to utilize electronic security cameras and their recordings, while maintaining individual privacy in accordance with University values and applicable laws.

The purpose of this policy is to regulate the procurement, installation, placement and use of security cameras to monitor and record public areas for safety and security. This policy applies to the use of security cameras for monitoring and recording and therefore applies to the premises of Rice University and to all members of the Rice community, including faculty, staff, students, visitors, vendors and contractors. Cameras are intended to serve two main purposes:

- a. **Personal Safety** – To capture video, in the event an individual is the subject of harm or crime, that provides information or evidence of what occurred and who is responsible, and thereby deter crimes or harmful conduct toward individuals.
- b. **Property Protection** – To capture video, in the case of lost, stolen or damaged property, that provides information or evidence of what occurred and who is responsible, and thereby deter property crimes or violations.

2. ROLES AND RESPONSIBILITIES

- a. Rice University Police Department (RUPD) is responsible for the implementation of this policy and is authorized to oversee and coordinate the use of all University security cameras, including installation and monitoring.
- b. **Security Systems Manager** – appointed by the chief of police, is responsible for maintaining Rice’s security camera operation in compliance with this policy.
- c. **Operators** – those authorized to view live or “real-time” security camera video feeds.

3. DEFINITIONS

- a. **Security Cameras** – a device used to transmit a signal containing images that can be viewed remotely by authorized Rice University personnel; excludes cameras worn by RUPD officers as these are governed by RUPD departmental procedures.
- b. **Security Camera Monitoring** – the viewing of security camera images in real-time by authorized Rice University personnel.

- c. **Security Camera Recording** – the digital, analog or other electronic storage of security camera images.

4. ELABORATION OF POLICY

Authority to Deploy Cameras

The decision of whether to deploy security cameras and the specific placement of those cameras falls under the authority of the Security Systems Manager¹. These decisions will be based on risk assessments, security surveys, safety concerns, vulnerabilities and historical acts of criminal behavior.

Location of Security Cameras

- a. The Security Systems Manager will review and determine camera locations to ensure that each fixed location camera conforms to this policy and will be responsible for compiling the master list of camera placements at Rice University. Included with the list of camera locations will be a general description of the technology deployed and the capabilities of the cameras. The location of temporary cameras that are to be used for special events or investigations will be reviewed by the Chief of Police (or the Chief's designee) to ensure compliance with this policy and must be approved before deployment.
- b. Cameras may not be used in areas where a reasonable expectation of privacy exists. Examples of such areas include, but are not limited to: residential/dormitory rooms; restrooms; shower areas; locker rooms or other areas where persons change clothes; private offices (except when part of an RUPD investigation); space used for provide physical, medical or psychological care².
- c. In consultation with the General Counsel, the Chief of Police will review any complaints regarding camera locations and determine whether the policy is being followed. The Chief of Police will decide the merits of any complaint while weighing the potential benefits in community safety against any impact on privacy and other issues raised in the complaint.
- d. If concerns arise regarding camera placement, written requests can be made to the Chief of Police to forgo the installation of a proposed camera or for the removal of an existing camera. The Chief of Police will determine the appropriateness of an installation or removal after weighing the concern of the person(s) making the request and the safety and security of the community.

Live Monitoring³

¹ The Chief of Police and Security Systems Manager should consult relevant stakeholders in deciding where to put cameras (i.e. residential college leadership in the colleges, faculty and staff of academic buildings)

² While not technically private areas, special care and approval must be taken before placing cameras in indoor common areas such as college commons and break rooms

³ Throughout the document, use "live monitoring" consistently as opposed to also referring to it as "real-time" and "active monitoring"

Video cameras (and their recorded images) will not be used to monitor the conduct of faculty, staff, students, vendors, contractors or other visitors except as part of a legitimate investigation pertaining to conduct violating the law or University policy. While real-time viewing is not the typical use for security cameras, this policy does not prohibit (nor does it imply) real-time viewing. Any monitoring or real-time viewing will ordinarily be as the result of a written complaint or report of law or policy violations and requires the following⁴:

- a. A memo or other written instructions as to the nature and scope of monitoring to be undertaken. The Security Systems Manager will seek guidance from Human Resources, Office of the Provost, General Counsel, or other resources as appropriate, to ensure legal and policy compliance.
- b. Real time monitoring will be conducted only by trained, authorized RUPD personnel and at all times will be consistent with this policy and applicable law⁵. Violations of this policy or applicable law may result in disciplinary action, up to and including termination of employment or prosecution⁶.
- c. RUPD will maintain and have available, upon request, written or electronic data describing the purpose and location of security cameras deployed on the Rice University campus⁷.

Custodian of Video Materials

The Security Systems Manager is responsible for enforcing compliance with this policy and will review requests for release of video recordings, with no release occurring without consultation with⁸ the Chief of Police and University legal counsel. Recordings will reside on a secure university server and are not considered to be law enforcement records until a copy is obtained by RUPD from the secured server and placed into incident report, investigative file or other RUPD documentation.

The Chief of Police will review all requests to release recordings made under this policy. No release of recordings shall occur without authorization of the Chief except in accordance with official requests for digital recordings directly related to a criminal investigation, arrest, prosecution, subpoena or applicable law. The Chief of Police will approve release of recordings only for legitimate purposes⁹, such as to protect the University and its members

⁴ As agreed upon, either remove the word “ordinarily” or delete this sentence

⁵ Inconsistent with language in the RUPD policy implying, for example, that Rec Center employees would be able to view live videos on their property

⁶ A similar clause should apply to the whole policy, not just the live-monitoring section. Violations of this policy should result in disciplinary action including termination of employment or prosecution

⁷ This clause should be moved up to the “Location of Security Cameras” section and it should be specified that this list should be publicly available

⁸ Change “consultation with” to “approval from”

⁹ “and in the spirit of the policy”

from harm or for purposes of legal defense. The Chief will consult with General Counsel and Office of Public Affairs in these cases prior to the release of recordings.

5. PROCEDURES

See RUPD Procedures on Security Camera Use.

6. REQUEST FOR SECURITY CAMERAS/INSTALLATION

- a. All requests to install security cameras must be made through the Security Systems Manager and must include the following: proposed location; purpose; name and position of departmental point of contact.
- b. The RUPD shall review all requests to ensure compliance with the policy and to provide subject matter expertise to the department regarding camera placement, fields of view and to coordinate installation and training.
- c. RUPD shall be responsible for the coordination and installation of security camera systems by working with other Rice University departments such as Information Technology, Facilities, Engineering & Planning, Housing & Dining, General Counsel, Human Resources and outside third-party vendors.
- d. No department shall purchase, contract, install or attempt to install security cameras or recording equipment independent of this policy.

7. CROSS REFERENCES

Rice University Policy 805-00 - Safety Policy

Rice University Policy 815 Non-Discrimination/Affirmative Action Policy

8. RESPONSIBLE OFFICERS

Responsible Officer: Vice President of Administration

Key Office: Rice University Police Department

Effective Date: _____

David W. Leebron, President



Appendix B: RUPD Security Camera Policy



RICE UNIVERSITY POLICE DEPARTMENT

PASSED

Subject:	Security Camera System	Number:	ADM-37
Category:	Administrative	Type:	Policy
Effective Date:			
Issuing Authority:	Chief Johnny C. Whitehead		
Amends:	N/A		
References:	CALEA 91.1.8		

1. **PURPOSE:** The purpose of this policy is to outline the security camera system and regulate its operation. The security system is but one of the several tools used to protect the safety and property of the university community.

2. **DEFINITIONS: For the purpose of this policy the definitions apply as follows:**
 - a. *Security Camera* – a device used to transmit a signal containing images that can be viewed remotely by authorized Rice University personnel; excludes cameras worn by Rice University Police Department (RUPD) officers as these are governed by RUPD departmental procedures.
 - b. *Security Camera Monitoring* – the viewing of security camera images in real-time by authorized Rice University personnel.
 - c. *Security Camera Recording* – the digital, analog or other electronic storage of security camera images.
 - d. *Operators* – those authorized to view live or “real-time” security camera video feeds.
 - e. *Security Systems Manager* – appointed by the chief of police, is responsible for maintaining Rice’s security camera operation in compliance with this policy.

3. **POLICY:** It is our policy to enhance the sense of security on campus by placing, maintaining, recording, regularly testing and then periodically reassessing the location of security cameras on the university and other properties controlled by Rice University.

4. PROCEDURE¹⁰:

- a. Any RUPD personnel with access to view or retrieve camera recordings are subject to this policy and are required to acknowledge their understanding and compliance with this policy prior to being granted access to security camera systems and are required each year to acknowledge their understanding and compliance.
- b. All information acquired from the use of security cameras (either viewed in real-time or recorded) is considered confidential. Any dissemination of observations or other information other than for official purposes is prohibited.
- c. RUPD is responsible for oversight, enforcement and quality assurance of all security cameras covered by this policy and shall randomly review camera recordings to ensure compliance with this policy¹¹.
- d. RUPD will limit camera positions, fields of view and capabilities such as “zooming” so as to conform to policy.
- e. To ensure compliance with this policy and to protect the evidentiary value of recordings, the RUPD will limit those individuals with access to retrieve or view stored recordings to authorized staff of the RUPD. Individual departments with security cameras in their workspaces shall be granted access to view camera feeds, but not retrieve stored recordings except through request procedures outlined in this policy. If post-incident investigation is required, departments should contact the RUPD and complete an official report.
- f. In situations where application of this policy is not clear, the Security Systems Manager will maintain the status quo of the recordings at issue but seek clarification from University General Counsel and the Chief of Police.
- g. No effort will be made to conceal those security cameras located in public spaces, with the exception of official, authorized cameras being used in active police investigations and approved by the Chief of Police in accordance with this policy.
- h. No attempt shall be made to alter any part of camera recordings. RUPD will configure security camera recording systems to reasonably prevent operators from

¹⁰ Add a clause at the end of this section elaborating on the repercussions of violations of this policy (disciplinary action, potential termination of employment, or prosecution)

¹¹ Describe a more structured process than “randomly reviewing” recordings to ensure compliance

tampering with, duplicating, reproducing or disseminating in an unauthorized manner any recorded information.

- i. Recordings will be maintained on a secure server operated by Rice's Information Technology division. In most cases, recordings will be stored for a period of no less than 30 days and no more than 60 days, depending on configuration settings in the recording device¹². Once the storage of an archival device reaches capacity, stored images may become overwritten and unavailable. An exception to this procedure is a recording retained as part of a criminal investigation or court proceeding (criminal or civil), or other bona fide use as approved by the Chief of Police. Images saved for such purposes may be recorded to another storage device in accordance with applicable evidentiary procedures.
- j. All Operators will be trained in the technical and policy parameters of appropriate camera use, including;
 - i. Operators will receive and review a copy of this policy with the RUPD Security Systems Manager and must provide written acknowledgment that they have read and understood its content.
 - ii. Operators will receive training in cultural/diversity awareness.
 - iii. Operators will not alter or augment camera angles to view private or excluded areas identified within this policy, including residential spaces or windows to such spaces.
- k. Operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability or other protected class covered by Rice non-discrimination policies. Operators in control of cameras shall only monitor suspicious behavior, without regard for individual characteristics.
- l. Mobile or portable video equipment may be used in criminal investigations if approved by the Chief of Police. This equipment may also be used in non-criminal investigations or during events but only for a limited duration, when there is significant risk to public safety or security, and with approval of the Chief of Police.

¹² Specify that all potential copies of the footage will be deleted after 30-60 days unless the video is part of an active investigation.

- m. Security cameras may be viewed live or in real-time by authorized and trained operators, though such monitoring is expected to be very limited¹³. In each case, the monitoring of cameras shall be consistent with this policy¹⁴.
- n. Secondary recording of live video feeds, such as through the use of a mobile phone or other video camera, is strictly prohibited.
- o. For additional information concerning procurement, installation, placement and the use of security cameras see [\(Insert hyperlink to University policy here\)](#)¹⁵.

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¹³ Specify what kinds of situations would warrant live-viewing of videos

¹⁴ And the “Security Camera Acceptable Use Policy”

¹⁵ The actual hyperlink should actually be added here