



**TEXAS SOUTHERN UNIVERSITY**  
**MANUAL OF ADMINISTRATIVE POLICIES AND PROCEDURES**

**SECTION: Operations**  
**AREA: Campus Police**

**Policy 04.04.05**

<b>SUBJECT: Closed Circuit Television Monitoring &amp; Recording Policy</b>
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**I. PURPOSE AND SCOPE**

Texas Southern University is committed to providing a safe environment by integrating the best practices of policing with state of the art technology. A critical component of a comprehensive security plan is Closed Circuit Television (“CCTV”) — a technology that can remotely monitor and record activity on campus.

The purpose of this policy is to provide guidelines for the use of CCTV on University property in a way that enhances security, but also respects the expectation of reasonable privacy among members of the community. This policy applies to all students, faculty, staff, divisions, colleges, schools, departments, organizations and visitors within the University community.

**II. POLICY PROVISIONS**

- A. CCTV monitoring is to deter crime and to protect the safety and property of the University community. Safety and security purposes include, but are not limited to:
  - 1. Protection of individuals, including students, faculty, staff and visitors;
  - 2. Protection of University owned and/or operated property, and buildings, including building perimeters, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, and cashier locations;
  - 3. Verification of alarms and access control systems;
  - 4. Patrol of common areas and areas accessible to the public, including transit stops, parking lots, public streets and pedestrian walks; and
  - 5. Investigation of criminal activity and serious misconduct, such as, sabotage of research projects, in accordance with this Policy.
  
- B. Any diversion of security technologies for purposes other than the safety and security purposes contemplated by this Policy is prohibited.

- C. CCTV monitoring will be conducted in a professional, ethical and legal manner. Personnel involved in monitoring will be appropriately trained and supervised in the responsible use of this technology. Violations of the Code of Procedures set forth under Section III below may result in disciplinary action consistent with the rules and regulations governing employees of the University.
- D. Information obtained through monitoring will only be released when approved by the Chief of Police of the Texas Southern University Department of Public Safety.
- E. Monitoring will be conducted in a manner consistent with all existing University policies, including the EEO Policy, the Sexual Harassment Policy, and other relevant policies. Monitoring based on the characteristics and classifications contained in the EEO Policy (e.g., race, gender, sexual orientation, national origin, disability, etc.) is strictly prohibited.
- F. Monitoring shall be limited to uses that do not violate the reasonable expectation of privacy. Students have a greater expectation of privacy in their personal residential rooms/suites, than in the hallways and lounges of residential facilities, hereby referred to as "common areas" of usage. Therefore, monitoring for safety and security purposes will be used in residential hallways and lounges. Monitoring of residential rooms and suites (or common areas contained therein) is not permitted under this Policy without authorization from all residents of the subject suite or room, unless a criminal investigation is being conducted and probable cause exists for surveillance to be conducted in the residential rooms.
- G. The existence of this Policy does not imply or guarantee that cameras will be constantly monitored in real time.
- H. All existing uses of video monitoring and recording shall be brought into compliance with this policy within six (6) months of the approval of this Policy.
- I. Any remote or local viewing access will be approved by the Chief of Police.

### **III. RESPONSIBILITIES**

- A. The Texas Southern University Department of Public Safety, in consultation with the University's Safety Department, is authorized to oversee the use of CCTV monitoring for safety and security purposes at the University. All University areas using CCTV monitoring are responsible for implementing this Policy, including the Code of Procedures, in their respective Departments.
- B. The Chief of Police has the responsibility to authorize all long-term CCTV monitoring. Additionally, the Chief of Police and/or his/her designee have the responsibility to authorize any temporary installation as deemed necessary in

connection with a criminal investigation, for enhanced security for special events, or as otherwise deemed necessary to protect the safety and security of the University.

- C. All new Department installations will follow this Policy. Departments wishing to install monitoring systems should petition the University's Chief of Police. The written petition should include the following information: (1) a description of the safety or security issue warranting the installation of CCTV monitoring systems, (2) the number and proposed location of camera(s) to be installed, and (3) whether the location of cameras involve the recording of activity by students, faculty, staff or the general public and to what extent, and the appropriate funding source must be identified. The installation shall not proceed unless the Chief of Police approves the petition in writing.
- D. Students, faculty and staff entering certain sensitive locations on campus may have an increased concern for privacy or confidentiality. In these locations, concerned persons may petition the Chief of Police to forgo the installation of a proposed camera or, for the removal of an existing camera. The petition should identify the location/proposed location of the subject cameras and should detail the rationale for the request for removal. The Chief of Police will consider the petition and render a decision regarding the appropriateness of foregoing installing/removing camera(s), weighing the concerns of the person(s) making the requests and the safety and security of the entire community. Any requests for appeal of the Chief's decision shall be completed in accordance with the guidelines for appeal as outlined in this policy.
- E. The Chief of Police, in consultation with the Office of General Counsel, will review and respond to subpoenas from outside organizations seeking the release of recordings obtained through CCTV monitoring.
- F. Requests for CCTV recordings made in connection with internal/department disciplinary investigations of University employee and/or student misconduct will be forwarded to the Chief of Police. The Chief of Police will review such requests and render (again, see paragraph G below which describes an appeal process) a decision regarding the appropriateness of releasing the recordings, weighing the concerns of the disciplinary official/committee making the request against privacy interests and safety and security of the entire community.
- G. Any appeal of a decision by the Chief of Police will be reviewed by Office of General Counsel who will render a decision. An appeal may be taken to the President to review the decision rendered by General Counsel. The President's decision is final.

## IV. CODE OF PROCEDURES


A.	All operators and supervisors involved in video surveillance will perform their duties in accordance with this Policy.
B.	The Chief of Police will limit camera positions and views of residential housing in compliance with this Policy.
C.	Surveillance centers will be configured to prevent camera operators tampering with or duplicating recorded information.
D.	Recordings may be retained for a period not to exceed forty-five (45) days and will then be erased, unless retained as part of a criminal investigation or court proceedings (criminal or civil), or other bona fide use as approved by the Chief of Police.
E.	Recordings will be retained in a secure location with access by authorized personnel only.
F.	Camera control operators who view recordings must do so in the presence of a supervisor to maintain the integrity of the recording.
G.	Camera control operators will be trained in the technical, legal and ethical parameters of appropriate camera use. Camera control operators will receive a copy of this Policy and provide written acknowledgement that they have read and understood its contents.
H.	Camera control operators will not monitor individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications protected by the Campus's Non-Discrimination Policy. Camera control operators will monitor based on suspicious behavior, not individual characteristics.
I.	Camera control operators will NOT view private rooms or areas through windows.
J.	Camera control operators will not spot and continuously view people becoming intimate in public areas, unless there is an administrative or criminal violations committed.
K.	Portable hidden cameras with recording equipment will only be used for criminal investigation by the Texas Southern University Department of Public Safety with the approval of the Chief of Police.

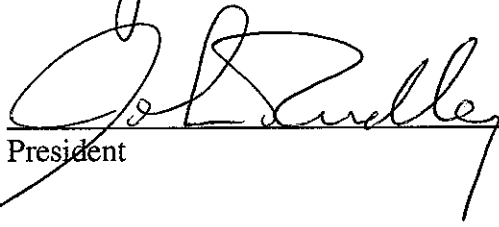
V. REVIEW AND RESPONSIBILITIES

Responsible Party: Chief of Police

Review: Every three years, on or before September 1

VI. APPROVAL

  
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Vice President of Finance

  
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President

Effective Date: 9/28/11