I. Standards and Guidelines Statement:

The purpose of these standards are to provide guidelines for the use of CCTV on University property in a way that enhances security, while at the same time respects the expectation of reasonable privacy among members of the community. Further, these standards and guidelines are intended to formalize procedures for the installation, monitoring, store, dissemination and destruction of surveillance records. All University departments or units using CCTV and web camera surveillance are requested to implement these standards and guidelines in their respective operations.

The GSUPD shall not collect or maintain information about members of the University community (faculty, staff or students), except in connection with alleged crimes, violations of University regulations, or as specifically authorized in writing by the President.

The existence of this these standards and guidelines does not imply or guarantee that cameras will be monitored in real time 24 hours a day, seven days a week by GSUPD.

II. Reason for this Standard:

The purpose of these standards and guidelines is to provide guidelines for the use of CCTV on University property in a way that enhances security, while at the same time respects the expectation of reasonable privacy among members of the community. Further, these standards and guidelines are intended to formalize procedures for the installation, monitoring, store, dissemination and destruction of surveillance records. All University departments or units using CCTV and web camera surveillance are requested to implement these standards and guidelines in their respective operations.

The existence of this these standards and guidelines does not imply or guarantee that cameras will be monitored in real time 24 hours a day, seven days a week by GSUPD.

III. Entities Affected By This Standard:

All faculty, staff, students of Georgia State University, as well as visitors to the University, are covered by this these standards and guidelines.
IV. Definitions

These definitions apply to these terms as they are used in these standards and guidelines:

**CCTV**: Closed circuit is a technology that can be used to remotely monitor and record activity across the university campus. CCTV (closed-circuit television) is a TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes.

CCTV relies on strategic placement of cameras, and observation of the camera's input on monitors somewhere. Because the cameras communicate with monitors and/or video recorders across private coaxial and/or Ethernet wire cable runs or wireless communication links, they gain the designation "closed-circuit" to indicate that access to their content is limited by design only to those able to see it. Modern CCTV displays can be color, high-resolution displays and can include the ability to zoom in on an image or track something (or someone) among their features.

a. **Public Area**: An area open for public use where the expectation of privacy is not violated by what could normally be openly observed, such as the campus grounds, an academic hallway, classroom, library, or study rooms.

b. **Private Area**: Areas where an individual might change clothing, such as bathrooms, shower areas, locker and changing rooms. This would also typically include private office spaces; however, exceptions are appropriate in those areas where monetary transactions occur or where the use of CCTV is needed to safeguard money or supplies from theft, destruction or tampering.

c. **Video Surveillance Technology**: Any item, system, camera, technology device, communications device, or process, used along 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. Images captured by video surveillance technology may be real-time or preserved for review at a later date. CCTV is one form of video surveillance technology.

Standards and Guidelines

1. **Scope of Standards and Guidelines.**

This standard applies to all Georgia State University personnel, including employees, temporary employees, student employees, interns and contractors involved in the use of CCTV and web camera surveillance and recording at Georgia State University. This standard encompasses all use of video equipment for the purpose of surveillance on or in any University property, facilities, and spaces and/or during the course of University-sponsored activities. Employing units of the University may establish more specific expectations in addition to this these standards and guidelines or elaborate on this these standards and guidelines in greater detail.

2. **Exclusions.**

This standard does not apply to video used by or for:
**Non-surveillance purposes.** Examples of non-surveillance video recordings include, but are not limited to, video recordings made for:

- Instructional, academic, or artistic purposes
- Capturing public events and performances
- Recording promotional or news events
- Convenience such as weather or construction site viewing
- Video conferencing
- University research purposes
- Patient care or medical treatment

**The Office of the Assistant Vice President for University Police (Chief of Georgia State University Police) (GSUPD)**

GSUPD is authorized to utilize video surveillance as necessary to fulfill their mission and responsibilities as a law enforcement agency.

Cameras installed in University space leased to an external party:

The external party will provide the location of all video surveillance equipment in University space to GSUPD.

These standards and guidelines also do not apply to audio recordings as they are addressed by state and federal laws including the audio portion of a video recording.

3. **Overview**

Georgia State University recognizes the need to strike a balance between the individual’s right to be free from invasion of privacy and the institution’s duty to promote a safe environment for all community members. In light of this recognition, the university will use CCTV to enhance security, safety and the quality of life of the campus community by integrating the best practices of “virtual policing” with state-of-the-art technology. CCTV technology will extend the protection of the GSUPD, even when law enforcement officers are not in the immediate area. And, while not a guarantee of safety, CCTV is a tool that can be used to assist GSUPD personnel.

The purpose of CCTV surveillance at the university is three-fold:

- To promote a safe environment by deterring acts of harassment or assault
- To deter theft and vandalism and assist in the identification of individuals who commit damage to university property
- To assist law enforcement agencies with regard to the investigation of any crime that may be depicted

Video monitoring for security purposes will be conducted in a professional, ethical and legal manner. GSUPD personnel involved in active video monitoring will be appropriately trained and continuously supervised in the responsible use of this technology.
Violations of procedures for video monitoring referenced in these standards and guidelines may result in appropriate administrative and/or disciplinary action consistent with the rules and regulations governing employees of Georgia State University.

Finally, any information obtained in violation of this these standards and guidelines may not be used in a disciplinary proceeding against a member of the College faculty, staff or student body.

4. Principles and Rationale

Georgia State University is committed to protecting the safety and property of our community by promoting a secure campus environment while avoiding unnecessary intrusions. These standards and guidelines is intended to assure the appropriate use of video surveillance for reasons of safety, security, and stewardship of people and resources and provide transparency in the use of that technology/equipment.

Video surveillance of individuals is prohibited if the use of such surveillance is based upon considerations that violate applicable university policies. http://www.gsu.edu/about/governance-and-strategy/university-policies/

Video surveillance will be used in a professional and ethical manner in accordance with university standards and guidelines as well as local, state, and federal laws and regulations, as well as any other relevant standards, such as those specific to health care organizations (College of Nursing, etc.).

The use of personal "webcam" technology that records video using portable electronic devices for surveillance purposes will not be implemented by IST or GSUPD. Use of these devices by other departments at the university is discouraged.

Virtual surveillance cameras will not be implemented by IST or GSUPD. Use of these devices by other departments at the university is discouraged.

5. Procedures

An administrative committee will be formed to monitor the application of this these standards and guidelines to new and existing uses of video surveillance; to create operational procedures related to the approval of requests, retention of and access to video surveillance footage, use of signage; and to provide for timely reviews of this these standards and guidelines. The committee will be comprised of members from the following campus organizations:

• Facilities
• IS&T
• GSU Police Department
• Legal
• Housing
• Auxiliary Services
A. CCTV Installation and Placement

The Chief, GSUPD should be consulted for all CCTV and web camera surveillance for safety and security purposes at the University. All new installations should follow these standards and guidelines. The Georgia State University’s Office of the President and the Office of the Chief University Attorney will be notified of any and all camera surveillance installations which have been reviewed by the GSUPD.

In carrying out this responsibility, the Chief, GSUPD will also accept input and recommendations from members of the university community regarding suggested camera locations. The locations of temporary cameras to be used for special events should also be reviewed by the Chief, GSUPD. (Note: “Temporary” does not include mobile video equipment or hidden surveillance cameras used for criminal investigations.)

In proposing camera locations, the Chief, GSUPD shall be guided by the following rules governing placement of CCTV technology. Any exceptions to these rules must be approved by the President.

(1) Public Areas. Except when employed as a forensic tool by the GSUPD, video surveillance shall be restricted to public areas and areas commonly used by University community groups. These include, but are not limited to, the following areas:

- Alleys, service drives, and streets
- Athletic fields
- Audience seating
- Cash handling facilities
- Dining facilities
- Hallways
- Laboratories
- Library interiors
- Loading docks
- Plazas, sidewalks, and other pedestrian walkways
- Parking lots
- Retail establishments
- Rooftops
- Safes

(2) Private Areas. Video monitoring should be limited to those areas where individuals would not have a reasonable expectation of privacy. Accordingly, except when specifically authorized, such as through the use of a search
warrant, video surveillance shall not be approved in any of the following places:

- Individual dormitory rooms (without the occupant’s permission)
- Public restrooms toilet stalls
- Public restrooms with urinals
- Individual offices (with the occupant’s permission and subject to narrow exceptions to safeguard money, documents and supplies)
- Locker or dressing rooms (where showering or disrobing is routine)

(3) **Residential Housing Views.** The Chief, GSUPD shall ensure that camera positions and views of residential housing are limited. Any view of student housing will be no better than what is available with unaided vision. Furthermore, the view of a residential housing facility must not violate the any students’ reasonable expectation of privacy in that area.

(4) **Residential Housing Hallways and Lounges.** In recognizing that students may also have an enhanced expectation of privacy in the hallways and lounges of residence facilities, CCTV/web camera surveillance for safety and security purposes will be used solely on exit and entry doors in those facilities, unless the Chief, GSUPD determines that a specific safety/security risk exists. This should not be construed as prohibiting installation of CCTV/web cameras inside residence hallways when their use is strictly confined to viewing exit or entry doorways.

(5) **Notice of Surveillance.** Except in applications of forensic video surveillance being clandestinely conducted by law enforcement personnel, where possible signs should be displayed prominently in public areas covered by video surveillance informing the public of the usage of video surveillance on the campus.

- **Exterior Cameras.** For exterior cameras, these signs will be posted in a conspicuous place in close proximity to the video surveillance camera.
- **Interior Cameras.** For interior cameras, video surveillance warning signs shall be placed at or near each entrance to the places being monitored. In addition to noting that a specified area is subject to video surveillance, the signage shall also include the name and phone number of a contact person who can answer questions about the surveillance system and these standards and guidelines.

6. **Notice of These standards and guidelines.** The Chief, GSUPD is responsible for disseminating these standards and guidelines on campus and for advising departments on the appropriate application of surveillance technologies. Additionally, to help
maintain an informed University community, the GSUPD will post this these standards and guidelines on its website, as well as location information for all CCTV monitoring locations.

7. Placebo Cameras. The GSUPD will not utilize inoperative, perfunctory, placebo, or “for looks-only” video surveillance equipment. The existence of placebo cameras is difficult to keep secret, and public knowledge of placebo camera installations lessens the deterrent effect of all video surveillance systems. Use of these devices by other departments at the university is discouraged.

8. Changes in Law or Security Practices. The Chief, GSUPD shall monitor developments in the law and in security industry practices to ensure that camera surveillance is consistent with the best practices and complies with all Federal and State laws.

9. Installation. The GSUPD shall oversee the installation of all reviewed surveillance equipment, along with appropriate personnel from the Information Services and Technology (IS&T) and Facilities Management.

10. Objections to Camera Placement. Where complaints are made about the location of video surveillance cameras at the University, such as by students who believe their privacy is being infringed upon, the following process shall be followed:

   ● The Chief, GSUPD will review complaints regarding camera locations and determine whether this Video surveillance these standards and guidelines is being followed.
   ● The Chief, GSUPD will make a determination as to whether the potential benefit in community security outweighs any likely infringement of individual privacy.
   ● In light of this determination, the Chief, GSUPD will make a recommendation to the President regarding disposition of the complaint.
   ● Once a final decision regarding the complaint is reached, the complainant will be notified, in writing, of that decision.
   ● While not always possible, every attempt should be made to finalize decisions regarding complaints about video surveillance locations within ten (10) working days of receipt of the complaint.

11. Monitoring. All College employees involved in video monitoring of public areas should perform their duties in accordance with the practices outlined in these standards and guidelines. Specifically, the following guidelines shall apply to the monitoring of video surveillance cameras at the University:

   a. Generally. CCTV monitoring of campus areas for security purposes will be conducted in a manner that is professional, ethical, legal, and consistent with all existing College policies, including, but not limited to, those governing sexual harassment
and equal employment opportunity. Camera monitors shall monitor based on suspicious behavior, not individual characteristics. Monitoring individuals based on a person’s race, gender, sexual orientation, national origin, disability or other protected characteristic is strictly prohibited.

b. **Restricted Access.** Video surveillance monitors shall be located in controlled-access areas and shall not be viewable by unauthorized persons. No unapproved employees may monitor or view video or camera images for any reason except as necessary in the course of an investigation or adjudication. In furtherance of this expectation, the college will take reasonable security precautions to prevent unauthorized access to, use or disclosure of data monitored or recorded by any college surveillance systems.

c. **Viewing Access.** Access to video surveillance monitors will be limited. Specifically, the following guidelines shall apply in granting access to monitor the video surveillance cameras:

- GSUPD personnel should be permitted access to monitor all cameras at all times, regardless of location.
- Information Systems and Technology personnel should be permitted access to monitor all cameras at all times, regardless of location.
- The President, Provost, Senior Vice President for Academic Affairs, Vice President of Finance and Administration, Associate Vice President for University Police and Director of Housing should be permitted access to monitor all cameras at all times, regardless of location.
- Other Vice President’s or Deans not listed above should be permitted access to monitor all cameras that capture images or areas that fall within the work area or building location of any Department under their purview.
- Department heads and Directors should be permitted access to monitor all cameras that capture images or areas that fall within their work area or building location.
- Other faculty and staff personnel should be permitted access to monitor all cameras that capture images or areas that fall within their work area or building location only with the written concurrence of their Department head and the approval of the Chief, GSUPD.
- No other access shall be granted to any other members of the University community except as may be otherwise provided in these standards and guidelines. Requests for exceptions to the guidelines listed above shall be made, in writing, to the Chief, GSUPD. The request shall identify the individual for whom access is sought, the area to be monitored, and the rationale for why access should be granted. The decision to grant access will be made by the Chief, GSUPD.
d. **Training.** All personnel involved in the supervision, application, use or monitoring of video surveillance technology at the University are advised to meet the following requirements:

- Be trained in the technical, legal and ethical parameters of appropriate camera use; and
- Receive a copy of these standards and guidelines and provide written acknowledgement that they have read and understood its contents.

e. **Sanctions:**

- GSU employees are subject to disciplinary measures as set forth in University’s Employee Handbook.
- Temporary employees are subject to disciplinary actions ranging from oral reprimand to dismissal from employment.
- Security service personnel and contractors are subject to disciplinary actions ranging from oral reprimand and notice to supervisor to dismissal.
- Student interns as subject to disciplinary actions ranging from oral reprimand to removal from University program(s).

f. **Private Rooms or Areas.** Camera control operators shall not view private rooms or areas through windows.

g. **Intimate Activity.** Camera control operators will not spot and continuously view people becoming intimate in public areas.

h. **Audio Recordings.** The video surveillance systems used by the University will record video only. Audio recordings will not be authorized, unless specifically approved by the University’s legal counsel.

i. **Evaluations of Employee Performance.** Video surveillance cameras will not be used by the University to evaluate employee performance or to monitor employees during their non-working time. However, surveillance camera may be used to monitor a student or employee work area, such as an area with financial transactions, even if there is only one student, faculty or staff member employed in that work area. Video surveillance camera used to monitor a work area will not be used to view the contents of computer screens.

j. **Data Collection.** Video surveillance cameras shall not be used to collect data on students, such as parking patterns or student activity.

k. **Community Requests.** Members of the University community who have the possibility of being observed through the use of cameras may request to see live video of active monitoring; recorded video is not available for viewing. This request
will be made to the Chief, GSUPD, and when convenient to do so, should be granted, consistent with operational requirements.

12. **Storage.** Video tapes or other media will be stored and transported in a manner that preserves security. Further, recorded images not related to or used for an investigation shall be kept confidential and destroyed on a regular basis. Accordingly, the following guidelines regarding the storage of video surveillance records shall be strictly adhered to:
   a. **Location.** Video surveillance records shall be stored in a secure location designed for the storage of video tapes with access limited to authorized personnel only.
   
   b. **Timeframe.** Generally, video surveillance records shall be stored for a period of not less than 30 days, after which they will be promptly erased, unless retained as a part of a criminal investigation, court proceedings (criminal and civil) or other bona fide use, as approved by the President. However, the Chief, GSUPD, in consultation with the President, may determine that video surveillance records of identified high priority areas be stored for a period of not less than 90 days before being erased.
   
   c. **Alterations.** No attempt shall be made to alter any part of any surveillance recording. Surveillance centers will be configured so as to prevent camera operators from tampering with or duplicating recorded information.
   
   d. **Access Log.** An access log shall be maintained by the Chief, GSUPD of all instances of access to, or use of, surveillance records. This log shall include the date, time, and identification of the person or persons to whom access was granted, as well as a summary of the reason for which access was necessary.
   
   e. **Operator Review of Recorded Footage.** Camera control operators who view recorded video footage must do so in the presence of a supervisor to maintain the integrity of that video footage.

13. **Release of Information.** Information obtained through video monitoring will only be released when authorized by the President of the college, according to the procedures established in these standards and guidelines. The following guidelines will govern dissemination of recordings obtained through the use of video surveillance technology:
   
   a. **Enforcement Purposes.** Information obtained through video monitoring will be used for security and law enforcement purposes, and the GSUPD will cooperate and assist local police as requested with criminal investigations. This includes providing copies of any recordings within the University’s possession.
b. **Commercial Use.** Under no circumstances shall the contents of any captured video recordings be exploited for purposes of profit or commercial publication, nor shall such recordings be publicly distributed except as may be required by law.

c. **Recordings Involving Criminality.** Except as outlined in paragraph (a) (above), recordings directly related to a criminal investigation, arrest or subpoena will not be released to any party. Where requests for recordings take the form of subpoenas or other legal documents, appropriate liaison with the University’s legal counsel is required.

d. **Public records requests.** All public records requests, including requests for the release of video surveillance footage, should follow the procedures outlined by the University’s Office of Legal Affairs.

e. **Other external release.** Prior written authorization from the Office of Legal Affairs or a designee, is required for any other release of video surveillance footage to any party external to the University.

14. **Audit.** The Vice President of Finance and Administration shall conduct an annual audit of the GSUPD to ensure compliance with this these standards and guidelines. This audit and the results of it shall be provided to the President, along with any identified findings of non-compliance.

15. **Destruction or Tampering with Video Surveillance Technology.** Any person who tampers with or destroys a video surveillance camera or any part of the video surveillance system will be subject to appropriate administrative and/or disciplinary action, as well as possible criminal charges.