

Security Camera Policy

1.0 Purpose

This policy sets out the framework within which WPI will use or allow the use of Security Cameras.

The primary purpose of utilizing security cameras in public areas is to deter crime and to assist in enhancing the safety and security of members of the University community and University property. The primary use of security cameras will be to record video images for use by public safety and other University officials charged with investigating alleged violations of law or University policy.

2.0 Applicability

This policy applies to employees and students employed by or enrolled at any WPI location. It also applies to contractors, service providers, clients, customers, and visitors.

The camera system shall be used in a manner consistent with all applicable laws and ordinances and, to the greatest extent possible, maintain individuals' right to privacy. To the extent reasonable and practicable, the University shall place and position cameras in a way that attempts to avoid incidental coverage, but cameras may overlook open offices or offices with glass doors and walls. Additionally, video cameras may be required in research areas based on particular grant requirements.

WPI reserves the right to install video cameras when requested by law enforcement (e.g., WPI Campus Police). Private areas where students and staff could reasonably expect complete privacy (e.g., locker rooms or bathrooms) will not be the subject of camera installation and monitoring except as required by law.

Lecture capture cameras and fixed cameras installed overlooking public places for TV broadcasts, websites, and other promotional uses are not subject to this policy.

3.0 Definitions

As used within and for the purposes of this policy, the following terms are defined as follows.



Private areas: areas in which a person has a reasonable expectation of privacy, including, but not limited to, non-common areas of residence halls, residence hall corridors, bathrooms, shower areas, locker and changing rooms, and other areas where a reasonable person might change clothes.

Public areas: areas made available for use by the public, including, but not limited to, campus grounds, parking areas, building exteriors, loading docks, areas of ingress and egress, classrooms, lecture halls, study rooms, lobbies, theaters, libraries, dining halls, gymnasiums, recreation areas, and retail establishments. Areas of the University in which persons would not have a reasonable expectation of privacy, but to which access is restricted to certain University employees, such as storage areas, shall also be considered public areas for the purpose of this policy.

Security camera: a camera used for monitoring or recording public areas for the purposes of enhancing public safety, discouraging theft and other criminal activities, and investigating incidents.

Security camera recording: a digital or analog recording of the feed from a security camera.

Security camera system: any electronic service, software, or hardware directly supporting or deploying a security camera.

4.0 Policy

WPI may use security cameras to enhance the safety and security of students, employees, and property, discourage the occurrence of unlawful behavior, enhance the ability to identify offenders, and as a means of maintaining situational awareness of activities occurring in and around campus. The camera system is not continuously monitored but provides for the use of "live feed" and, when necessary, a review of the recorded video that may be used in the furtherance of an investigation.

5.0 Implementation and Administration

Responsibility for oversight of the installation, maintenance, and utilization of security cameras and associated policies, standards, and procedures is that of the Director of Public Safety and Chief Technology Officer (CTO).

These responsibilities include:



- creation, maintenance, and review of a campus strategy for the procurement, deployment, and use of security cameras, including this and related policies;
- designation of the standard campus security camera system or service;
- authorizing the placement of all security cameras;
- authorizing the purchase of any new security camera systems;
- reviewing existing security camera systems and installations and identifying modifications required to bring them into compliance with this policy;
- creating and approving campus standards for security cameras and their use; and
- creating and approving procedures for the use of security cameras.

Camera Register:

A camera register will be maintained by the CTO and reviewed by the Director of Public Safety. The register will contain the following information:

- Location of camera
- Hours of operation
- Installation date
- Operational status review
- Location of recorded video storage

Use and Management of Recorded Video:

- Recorded video shall not be used or disclosed for purposes other than those specified in this camera policy. Requests for release of recorded material set forth in subpoenas or other legal documents compelling disclosure should be submitted to the General Counsel prior to any release.
- All recorded video and their contents are the copyrighted property of WPI and shall not be copied, distributed or used for any broadcast, performance, or publication without the express written direction of the Director of Public Safety or his / her designate, except when such actions are taken by law enforcement in conjunction with investigations or criminal prosecutions.
- The Director of Public Safety will have access to all recorded video and has the right to control, view, hold, store, and dispose of recorded video in accordance with this policy.



- The Director of Public Safety or his/her designee will be responsible for reviewing the recorded video according to the terms of this policy. No review of the recorded video will be done unless the Director of Public Safety or his/her designee is present.
- Unless the Director of Public Safety instructs otherwise, recorded video must be kept for thirty (30) days, after which it must be erased or destroyed unless a particular law or policy requires otherwise (e.g., for an ongoing litigation or investigation, pursuant to a subpoena, or as a record to substantiate WPI decisions regarding such investigations). Copies of recorded video will not be made unless they are relevant to the matter being investigated and authorized in writing by Director of Public Safety.
- Video footage will be stored on servers accorded appropriate computer security with access by authorized personnel only.
- Requests for release of recorded material must be approved by the Director of Public Safety.
- Records of access to and release of, Security Camera recordings must be sufficient to demonstrate compliance with this policy.

Positioning Cameras:

- The Director of Public Safety will be responsible for approving the location and geographical viewing area of any proposed camera installation. This will be done after a review of a written proposal demonstrating such need. The CTO will be responsible for installation.
- The installation of a temporary camera is limited to a specific need, such as an event or ongoing investigation, which will be determined by the Director of Public Safety in accordance with this policy.
- Inoperable, fake, or "dummy" video cameras or housings shall not be used.
- All video camera installations should be visible, unless a law enforcement agency such as WPI Campus Police, dictates otherwise (e.g. for use in a criminal investigation).

6.0 WPI Security Camera Roles

Director of Public Safety/Chief

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7.0 Enforcement

Any person that violates any of the measures found in this policy will be subject to disciplinary action, which may include termination or dismissal from WPI, or other appropriate disciplinary action.

8.0 Approval and Revisions

Policy Category: Institutional Risk & Compliance

Policy Approved By: Approved by WPI's Information Security, Risk and Compliance Committee on

2/15/19.

Policy Reviewed Annually By: Director of Public Safety

Related University Policies: None

Last Modified: 10/29/18