STANDARD ADMINISTRATIVE PROCEDURE

51.99.99.M0.01 Audiovisual Surveillance

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Standard Administrative Procedure Statement

This Standard Administrative Procedure establishes transparent processes and controls for using audiovisual surveillance equipment and any resulting recorded material.

Definitions

Audiovisual Surveillance - cameras or similar technology used to enhance security, safety, and quality of life for the TAMU campus community.

AVST - audiovisual surveillance technology.

Active AVST Installation - cameras or similar technology that are viewing/recording activities within the area of surveillance.

Official Procedure/Responsibilities/Process

1. General

Texas A&M University strives to provide a secure environment for members of its community and to protect state property. Ensuring a secure environment can be assisted by audiovisual surveillance technology. Such technologies must be used responsibly and within the intended scope of the purpose for their deployment.
2. Applicability

All installations of audiovisual surveillance technology must comply with these procedures except those installations authorized by the University Police Department (UPD) or System Internal Audit. The Qatar campus follows separate procedures set forth by Qatar administration.

3. Procedures

3.1 An Audiovisual Surveillance Technology (AVST) Committee has been established by the Chief Operating Officer to review AVST installations to verify compliance with AVST Operational Standards and consistent application of surveillance controls, and to oversee management of new and existing AVST. The AVST Committee shall be chaired by the Chief Operating Officer or his designated representative, and include representatives from Technology Services, University Police Department (UPD), Facilities & Energy Services, Transportation Services, Division of Finance, Emergency Management, and the Division of Risk, Ethics, and Compliance (DREC).

3.1.1 The purpose of the AVST Committee is to provide recommendations to the Chief Operating Officer (or designee) regarding the use of AVST.

3.1.2 The AVST Committee will maintain criteria for evaluating requests for location and deployment of AVST equipment.

3.1.3 As information resources, AVST equipment must meet all applicable security controls published by the university and System, and is subject to review and approval by the Chief Information Security Officer, or designee.

3.2 AVST equipment must not be located in or monitor a campus housing resident’s room or restroom/shower area. Requests for the deployment and location of AVST equipment in other portions of campus housing buildings must be coordinated through the Vice President for Student Affairs prior to review by the AVST Committee.

3.3 Conspicuous, public signage must be displayed at all main entrances to buildings or immediate area of monitoring for active AVST installations. Signs will read: “This area is subject to electronic surveillance and may or may not be actively monitored.”

3.4 Facilities & Energy Services is responsible for the oversight of AVST installations and must maintain a database of all approved installations, including
3.5 Equipment operators must be assigned the designated training by their unit and supervised in the responsible use of surveillance technology, including the technical, legal, and ethical parameters of such use. The AVST Committee will determine the content of the training and standards. Operators must receive a copy of the AVST Operational Standards, and must acknowledge that they have read and understood its contents. Such standards include monitoring of people only for suspicious behavior or authorized observation functions (e.g., Becky Gates Children’s Center). These standards prohibit monitoring of categories of individuals based on identity such as race, sex, ethnicity, sexual orientation, or disability.

3.6 Generally, installation of new or temporary AVST equipment must be approved by the AVST committee, and in coordination with Facilities & Energy Services. UPD input and recommendations must be a priority when considering placement of new or temporary equipment and specifically considered and responded to by the AVST Committee before any final decision on installation of new or temporary AVST equipment is approved for installation. If it is desired to change the location (i.e., a different surveillance space/room) of an approved AVST installation, then approval must be requested and granted based on the new location. If the rationale upon which an approval was based becomes invalid or no longer applicable, then a new approval must be requested and granted or the AVST must be removed. The AVST Committee should be informed of the removal of AVST installations and appropriate updates to the database of installations made.

3.7 Those faculty, staff, and students who have a complaint arising from the presence of surveillance equipment may file a complaint with the Division of Risk, Ethics, and Compliance.

3.8 Units administering AVST equipment must design monitoring locations to prevent tampering with recorded material. Cameras and similar technologies must have sufficient security measures (e.g., encryption) to prevent unauthorized access to the output of the equipment. Access must require authentication over a secure channel (e.g., SSL). Video output need not be encrypted, but reasonable measures should be taken to mitigate interception as approved by the AVST. Web cameras intended for general access to public events must be approved in advance, and privacy concerns must be specifically addressed in the request.

3.9 Recorded surveillance material shall be stored in secure locations accessible only to designated individuals. Such records are deemed “Transitory Information” and shall be retained for no less than thirty (30) days and no longer than 90 days.
Records preserved for longer than 31 days relevant to a specific official investigation are to be deleted when no longer needed for the investigation. Surveillance material kept by UPD is an exception to this requirement. Exceptions to this retention period must be approved in advance by the AVST Committee. Documented retention periods for existing equipment that cannot meet this requirement must be submitted to the AVST Committee.

3.10 All AVST livestreams and data/recordings will be made accessible to UPD in response to emergency situations or investigations. Other requests for the review/release of recorded AVST data/recordings must be reviewed and approved by the information resource owner (or designee) unless release is required by State or Federal law.

3.11 AVST data/recordings will be treated as confidential with regard to internal University procedures. The data/recordings may only be released for review as a result of normal procedures and regulations for the release or disclosure of information such as investigations by UPD or authorized University officials, subpoenas/court orders, or Public Information Requests. Requests and any needed approvals for the review/release of data/recordings shall be fully documented.

Related Statutes, Policies, or Requirements

Supplements

University SAP 29.01.03.M0.01 Security of Electronic Information Resources

AVST Operational Standards

Contact office

CONTACT: Office of the Chief Operating Officer

OFFICE OF RESPONSIBILITY: Texas A&M University Operations