



CORNELL UNIVERSITY
POLICY LIBRARY

Responsible Use of Video Surveillance Systems

POLICY 8.1

Volume: 8, Risk Management and
Public Safety
Chapter:1, Responsible Use of
Video Surveillance Systems
Responsible Executive: Executive
Vice President and CFO
Responsible Office: Risk
Management and Insurance
Issued: April 2, 2009
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POLICY STATEMENT

Cornell University allows the use of approved video surveillance systems through a transparent process, subject to rules governing equipment installation and employment, and use of the resulting recorded material.

REASON FOR POLICY

Cornell University aims to provide a secure environment for members of its community and to protect personal safety and property, assisted by video surveillance systems technology. Such technologies, however, must be used only to meet the university's critical goals for security, and in a manner that is sensitive to interests of privacy, free assembly, and expression.

ENTITIES AFFECTED BY THIS POLICY

- All units of the university

WHO SHOULD READ THIS POLICY

- All members of the university community

WEB ADDRESS FOR THIS POLICY

- This policy: www.dfa.cornell.edu/policy/policies/responsible-use-video-surveillance-systems
- University Policy Office: www.policy.cornell.edu

POLICY 8.1 Responsible Use of Video Surveillance Systems

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RELATED DOCUMENTS

University Policies and Documents

[University Policy 4.5, Access to Student Information](#)

[University Policy 4.12, Data Stewardship and Custodianship](#)

[University Policy 4.13, Acceptance of Legal Papers](#)

[University Policy 5.1, Responsible Use of IT Resources](#)

[University Policy 5.4.1, Security of Information Technology Resources](#)

[University Policy 6.4, Prohibited Discrimination, Protected Status \(including Sexual\) Harassment, and Bias Activity](#)

[Campus Code of Conduct](#)

[Cornell Design and Construction Standards: Use of VSS Equipment](#)

[Cornell University Emergency Response Plan](#)

Other Documents

[Department of Human Services and the United States Department of Agriculture Institutional Biosecurity Requirements as interpreted from the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 \(PHSBPRA\)](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)

[USA Patriot Act](#)

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CONTACTS

Direct any general questions about this policy to your unit's administrative office.

Ithaca Campus Units

Subject	Contact	Telephone	E-mail/Web Address
Policy Clarification and Interpretation	Director, Department of Risk Management and Insurance	(607) 254-1575	risk_mgmt@cornell.edu
Approval for Video Surveillance Systems (VSS) Installations	Director, Department of Risk Management and Insurance	(607) 254-1575	risk_mgmt@cornell.edu
Maintenance of and Enhancements to a VSS Administrative System	VSS System Administrator	(607) 255-7874	cab365@cornell.edu
Objecting to Video Surveillance Systems (VSS) Installations	Chief of the Cornell University Police Department ("Chief of Police")	(607) 255-3467	krz1@cornell.edu
Requesting the Release of Recorded Material	Chief of the Cornell University Police Department ("Chief of Police")	(607) 255-3467	krz1@cornell.edu
Requesting to Install New, Temporary, or Replacement Video Surveillance Systems (VSS)	VSS System Administrator	(607) 255-7874	cab365@cornell.edu
Requesting to Use Portable and/or Hidden Surveillance Equipment	Chief of the Cornell University Police Department ("Chief of Police")	(607) 255-8945	krz1@cornell.edu
Subpoena or Other Legal Inquiries	University Counsel	(607) 255-5124	counsel-web@cornell.edu

Weill Cornell Campus Units

Subject	Contact	Telephone	E-mail/Web Address
Subpoena or Other Legal Inquiry	University Counsel	(212) 746-0463	jkahn@med.cornell.edu
All Other Issues	Financial Manager, Engineering and Maintenance	(212) 746-1089	gjbrend@med.cornell.edu

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DEFINITIONS

These definitions apply to terms as they are used in this policy.

Surveillance Equipment Operator	Any person viewing or controlling a video surveillance system.
Unit	A college, department, program, office, research center, business service center, or other operating unit.
Video Surveillance System (VSS)	Any video installation with the capacity to view or record university owned or controlled spaces, with the exception of the following, when not used for surveillance: <ul style="list-style-type: none">• Personal Web cameras ("Web cams") connected directly to personal computers• Video streaming, webcasting, or audio/video distribution infrastructure equipment dedicated to the support of official university instruction or business needs
Video Surveillance Systems Advisory Committee	A group comprising members of the university community, including, but not limited to, representatives from Risk Management and Insurance (chair), Cornell University Police Department, Division of Human Resources, Dean of Students, University Counsel, and Dean of the Faculty. This group meets as needed, convened by the chief of the Cornell University Police Department, to review VSS installations for appropriateness; verify consistent application of surveillance controls; and decide on appeals when objections are filed.

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RESPONSIBILITIES, ITHACA CAMPUS UNITS

Chief of the Cornell University Police Department (“Chief of Police”)	<p>Consult on and authorize, as appropriate, video surveillance systems (VSS) installations in the following situations:</p> <p>When it is required for an impending visit by a dignitary</p> <p>When the Cornell University Police Department (CUPD) or University Audit is conducting a criminal investigation</p> <p>In an emergency situation (e.g., when there is a significant, imminent risk to public security and/or university property or a campus emergency)</p> <p>Immediately after an emergency installation has been authorized, inform the executive vice president and CFO or his or her designee and all appropriate offices.</p> <p>If appropriate, consult with the vice presidents of affected units in non-emergency situations where temporary VSS installations will occur (e.g., criminal investigation).</p> <p>Make final determinations in situations where a VSS installation decision is appealed.</p> <p>Convene, as needed, a meeting of the VSS Advisory Committee.</p> <p>Review requests for the release of recorded data, and approve as appropriate after consultation with university counsel.</p> <p>◆ Note: Where such requests take the form of subpoenas or other legal documents compelling production, the responsibility for responding to requests rests with university counsel. For more information, see University Policy 4.13, Acceptance of Legal Papers.</p>
Cornell University Police Department (CUPD)	Document the release of VSS recordings directly related to a criminal investigation, subpoena, or arrest.
Director, Risk Management and Insurance	Authorize, as appropriate, requests for permission for new, temporary, or replacement VSS installations.
Environmental Health and Safety	Ensure that VSS is utilized at the entrance to the locations of select agents, but that the select agent is not shown or recorded.
Unit	<p>Excluding emergency or investigative situations, post signage at all surveillance locations stating, “This area is subject to surveillance for security purposes and may or may not be monitored.”</p> <p>Design monitoring locations to prevent tampering with recorded material.</p> <p>Store recorded surveillance material in a secure location, accessible only to designated individuals, and retain material for no less than 14 days.</p> <p>Submit requests for exceptions to the recorded surveillance material retention period to the VSS System Administrator.</p> <p>For new, temporary, or replacement VSS installations, confirm with the university’s VSS System Administrator that integration with the university-wide VSS system is possible.</p> <p>Conduct, at least annually, VSS audits that included documentation of users and their access levels in the VSS system.</p>
Video Surveillance Systems (VSS) Advisory Committee	<p>Meet as needed, as convened by the chief of police, to review VSS installations for appropriateness.</p> <p>Verify consistent application of surveillance controls.</p> <p>Make appropriate determinations when objections to VSS installations and locations are filed.</p>

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RESPONSIBILITIES, ITHACA CAMPUS UNITS, CONTINUED

Video Surveillance Systems (VSS) Equipment Operators	Undergo training in the responsible use of VSS technology.
Video Surveillance Systems (VSS) System Administrator	Receive requests from units wishing to install new, temporary, or replacement VSS equipment, and confirm whether integration of the proposed installation with the university-wide VSS system is possible. Submit requests for permission to install VSS equipment to the director of risk management and insurance. Maintain and enhance VSS administration systems, as appropriate.

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RESPONSIBILITIES, WEILL CAMPUS UNITS

Financial Manager, Engineering and Maintenance	Authorize all video surveillance system (VSS) installations. Inform the senior director engineering and maintenance of VSS installations. Annually assess performance and appropriateness of VSS installations.
NewYork-Presbyterian Hospital (NYPH) Security Director	As authorized under the Weill Cornell Medical College-NewYork-Presbyterian Hospital (WCMC-NYPH) Security Management Agreement, provide consultation to the financial manager of engineering and maintenance on any imminent security risks or investigations where VSS may be utilized. Document any external release of VSS recordings. Ensure training of NYPH Security staff operating VSS.

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PRINCIPLES

Overview

Cornell University aims to provide its community with a secure environment, which is enhanced by using video surveillance systems (VSS) technology to monitor its campus. The university is also sensitive to the privacy and freedoms of expression and assembly of members of its community. As a result, this policy limits the use of approved equipment and the circumstances in which recorded material may be released. Furthermore, VSS technology is not intended to be used as a tool for routine performance management of university employees.

◆ **Note:** Violations of any aspect of this policy may lead to employment, civil, or criminal action.

◆ **Note:** This policy and its provisions are not intended to prohibit University Audit or University Counsel, directly or through an agent, from conducting investigations that may include the engagement of surveillance systems.

Administration of Video Surveillance Systems (VSS) Technology Installations

There are two options for VSS at the university. A unit may have a stand-alone installation at its location or may utilize the university's centralized system. At the Ithaca campus, for either installation, the camera image must be viewable by the Cornell University Police Department (CUPD) at its location. At Weill Cornell campus units, for either installation the system must be fully accessible to NewYork-Presbyterian Hospital (NYPH) Security. In neither case will the CUPD or NYPH Security provide monitoring of VSS cameras.

Special Residential Considerations

Views of residences must not be greater than what is afforded by unaided, human vision. Viewing through the windows of private rooms is prohibited. Approval may be granted by specific individuals, as detailed in the "Responsibilities" section of this policy, for temporary VSS installations in residential hallways and lounges, but only where there is a reasonable belief that there is an imminent security risk or an active investigation.

◆ **Note:** These provisions may be overridden by a warrant.

Surveillance Equipment Operators

Surveillance equipment operators must be trained and supervised in the responsible use of surveillance technology, including the technical, legal, and ethical parameters of such use. Operators must receive a copy of the standards of appropriate use, and must sign that they have read and understood its contents (at Weill Cornell campus units, no signature is routinely required). Such standards prohibit the targeting of individuals based upon perceived individual characteristics or classifications such as race, gender, ethnicity, sexual orientation, or disability. In addition, operators must

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PRINCIPLES, CONTINUED

not continuously observe people engaged in intimacy in public areas.

Information obtained in a manner that is in violation of this policy must not be used against a Cornell community member in a disciplinary proceeding.

Video Surveillance Systems (VSS) Advisory Committee (Ithaca Campus Units Only)

A VSS Advisory Committee will meet as needed at the request of the chief of the Cornell University Police Department (“chief of police”), to review VSS installations for appropriateness, verify consistent application of surveillance controls, and decide on objections that are filed.

The VSS Committee comprises the following:

- Risk Management and Insurance representative (chair)
- Cornell University Police Department representative
- Dean of the faculty, or a designee
- Human Resources representative
- University counsel, or a designee

Other members may be identified from time to time, as necessary for a specific project or purpose. The purpose of the VSS Advisory Committee is to assist the chief of police in balancing the concerns of the use of VSS and the resulting recorded material to improve security on campus with the community members’ interests in privacy, assembly, and free speech.

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PROCEDURES — ITHACA CAMPUS UNITS

Obtaining Approval

Units wishing to install new, temporary, or replacement video surveillance systems (VSS) equipment must first confirm with the VSS system administrator that integration with the university-wide surveillance technology system is possible (see the “Contacts” section of this policy). The VSS administrator must then submit a request for permission to install the equipment to the director of risk management and insurance, who will authorize the installation, as appropriate. The director will be guided by the need for security of people and property, concerns for the privacy of members of the university community, and the interests of these members to assembly and free speech.

The director may approve VSS installations in such areas as the following:

- Those containing such security systems as the following:
 1. Access control systems, which monitor and record restricted-access transactions at entrances to buildings and other areas
 2. Security alarms, including intrusion alarms, exit-door controls, hold-up alarms, cashier locations, etc.
- Those containing sensitive institutional data or technology operations
- Sections of the university campus and buildings that are high-traffic, such as shopping areas, perimeters, unrestricted entrances, exits, lobbies, corridors, and receiving docks
- Those housing sensitive operations, such as storage areas for special materials, laboratories, select agents, etc. For more information, contact the director of environmental health and safety
- Those containing rare, high-value, or merchandise property, such as the University Library Rare Book Collections and the Cornell Store
- High-crime areas

◆**Note:** In cases where workplaces are visible, the installation is not intended for routine performance management of university employees.

Signage

Conspicuous public signage must be displayed at all surveillance locations or the entrance to a single facility, except at emergency or investigative locations. Surveillance installations may or may not be monitored continuously. Therefore, units with active VSS installations must post signage stating, “This area is subject to surveillance for security purposes and may or may not be monitored.”

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PROCEDURES — ITHACA CAMPUS UNITS, CONTINUED

Objecting to a Surveillance Installation

If you believe the presence of surveillance equipment is in violation of this policy, you may file an objection with the chief of the Cornell University Police Department (“chief of police”). The chief of police shall rule on the objection within 10 working days.

If you do not agree with the ruling by the chief of police, you may request additional review by the VSS Advisory Committee, whose decision is final.

Storing and Retaining Recorded Material

Units administering VSS equipment must design monitoring locations to prevent tampering with recorded material. Units may contact Cornell University Police Department (CUPD) for guidance.

The following restrictions apply to storing, accessing, and retaining recorded surveillance material:

- Store in a secure location, accessible only to designated individuals
- Retain for no less than 14 days

Requests for exceptions to the minimum retention period must be submitted to the executive vice president and CFO.

Obtaining Release of Recorded Material

Requests for release of recorded data must be approved by the executive vice president and CFO, who is the appropriate data steward for VSS recorded material.

Recordings related directly to a criminal investigation, subpoena, or arrest are excluded from review by the executive vice president and CFO, although he or she must be informed. Release of recordings of this nature will be documented by the CUPD.

◆**Note:** Requests that take the form of subpoenas or other legal documents compelling production must be submitted to and approved by university counsel. For more information, see University Policy 4.13, Acceptance of Legal Papers.

Emergency, Investigative, and Other Special Use of Video Surveillance Systems (VSS) Equipment

The chief of police may authorize a VSS installation in the following situations:

- When it is required for an impending visit by a dignitary
- For a criminal investigation, by order of the CUPD or University Audit
- For an emergency situation (e.g., when there is a significant, imminent risk to public security and/or university property or a campus emergency)

In the event of a criminal investigation or an emergency VSS installation, the chief of

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PROCEDURES — ITHACA CAMPUS UNITS, CONTINUED

police, in consultation with the executive vice president and CFO or a designee and the affected unit(s) vice president(s), may approve the use of portable and/or hidden surveillance equipment (as opposed to a fixed location installation).

◆ **Note:** If time permits in the above situations, the chief of police will notify the associated vice president(s) and dean(s) before the installation. If this has not been done before the installation, the chief of police must do so as soon as possible after the installation has been authorized.

◆ **Note:** In all of the above cases, the chief of police must inform the VSS Advisory Committee of the installation at its annual meeting, and the group must review the decision for appropriateness and to verify consistent application of surveillance installation controls, while allowing the needs of the special circumstances to be met.

Audit Requirements

Units are responsible to see that annual VSS audits are conducted. Units must complete a documented audit of all VSS devices within their jurisdiction at least once every fiscal year. Total numbers must be reported to the CUPD.

Units are responsible for completing a documented audit of users and their access levels in the VSS system within their jurisdictions at least once every fiscal year.

Staff Separation

It is the responsibility of the unit to remove any VSS system access given to an individual at the time of separation from the university.

Failure to Comply

Violators of this policy may be subject to disciplinary action.

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PROCEDURES — WEILL CORNELL CAMPUS UNITS

Obtaining Approval for Installation of Video Surveillance Systems (VSS) Equipment

All installations of new, temporary, or replacement video surveillance systems (VSS) equipment must be approved by the financial manager of engineering and maintenance, who is the administrator for the college's security program. Decisions will be made in accordance with the principles of this policy. Exceptions to the standard use of the VSS may be granted by the senior director of engineering and maintenance.

Objecting to a Surveillance Installation

Objections to the presence of VSS equipment in violation of this policy should be directed to the financial manager of engineering and maintenance, who will review the objection and installation and make a determination. If the objection is not resolved at that point, the objection is to be referred to the senior director of engineering and maintenance. The senior director will review the objection and installation and obtain input from other departments, which may include New York Presbyterian Hospital (NYPH) Security, Risk Management, Human Resources, other user groups in the area that are impacted, legal counsel, the Campus Security Committee, etc. The decision made by the senior director of engineering and maintenance will be final.

Storing and Retaining Recorded Material

All data storage will be by digital means. Stored data will be retained for a minimum of 14 days.

Obtaining Release of Recorded Material

Requests for external release of recorded data must be approved by the senior director of engineering and maintenance, who will consult with legal counsel. Data directly related to a criminal investigation, subpoena, or arrest are excluded from review by the senior director of engineering and maintenance, but must be documented.

Temporary or Emergency Use of Video Surveillance Systems (VSS) Equipment

Temporary and/or covert video surveillance may be utilized when approved by the financial manager of engineering and maintenance in accordance with the principles of this policy.

Audit Requirements

The financial manager, in conjunction with NYPH Security, will perform an annual audit of the college's VSS equipment. The audit will be documented.

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PROCEDURES — WEILL CORNELL CAMPUS UNITS, CONTINUED

Staff Separation

Access to VSS equipment is controlled. Upon staff separation, it is the responsibility of the appropriate manager to arrange for the termination of any access the person had to VSS equipment.

Failure to Comply

Violations of this policy can lead to disciplinary action, up to and including termination.

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