



University of Pennsylvania Police Department 4040 Chestnut Street, Philadelphia, Pa 19104		 
Directive: 67	Subject: Closed Circuit Television Monitoring and Recording	Effective Date: 09/24/1999
Order of: Gary Williams, Chief of Police		Amended Date: 08/01/2023

I. Purpose

The purpose of this directive is to establish guidelines for the University of Pennsylvania Police Department (UPPD) relative to the use of closed circuit television (CCTV) cameras.

II. Policy

It shall be the policy of the UPPD to utilize CCTV cameras to monitor and record public areas to ensure the safety and security of the University community. Further, the UPPD shall abide by the **“University of Pennsylvania Policy for Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes”**.

III. Scope

This directive shall affect all sworn and non-sworn employees who use, or supervise the use of the UPPD CCTV system.

IV. Procedures

A. Use of CCTV Equipment

1. The use of CCTV equipment shall be limited to legitimate safety and security purposes, including but not limited to:
 - a. Property and Building Protection: Building perimeter, entrances and exits, lobbies and corridors, receiving docks, special storage areas, laboratories, cashier locations, ATM/CVC machines, emergency telephones;
 - b. Alarm Verification: Intrusion alarms, exit door controls, hold-up alarms;
 - c. Video Patrol of Public Areas: Transit stops, parking lots, public streets and intersections, shopping areas;
 - d. Criminal Investigation: Crimes against persons and property;

e. Monitoring of Access Control Systems: Monitor and record restricted access transactions at entrances to buildings and other areas; and

f. Monitoring of Pedestrian and Vehicle Traffic Activity

2. The use of CCTV equipment **shall not** be utilized for:

a. Profiling: The practice of targeting individuals based on characteristics of race, gender, ethnicity, sexual orientation, disability, or other classifications

b. Targeting of Individuals

c. Peering into Buildings

B. PennComm Center Responsibilities

1. All civilian PennComm employees shall be guided by the PennComm Standard Operating Procedures relative to the operation of CCTV equipment.

2. The PennComm Police Supervisor shall be notified immediately whenever any suspicious, criminal, or life-threatening activity is observed, and appropriate police personnel shall be dispatched. In the absence of the PennComm Police Supervisor, a patrol supervisor shall be notified by police radio.

3. All observations, notifications, and actions taken shall be documented, in detail, in the Computer Aided Dispatch (CAD) system.

C. PennComm Police Supervisor Responsibilities

1. The PennComm Police Supervisor will utilize the CCTV monitoring equipment at his/her workstation to monitor the following (if occurring in areas where CCTV cameras are available):

a. Crimes in progress

b. Vehicle stops

c. Pedestrian stops

d. Vehicle accidents

e. Adverse weather conditions or other hazardous conditions

f. Traffic flow within the University City area; and

g. Deployment of UPPD officers within the UPPD patrol area.

D. Stored Video Images, Policy And Procedures

1. Security of Stored Video Images

- a. Access to stored video images and video recording equipment is limited to:
 - 1) The Vice President for Public Safety
 - 2) Division of Public Safety Directors and Security and Technical Services Managers
 - 3) UPPD Commanders, Supervisors, and Detectives.
- b. Members of the University CCTV Monitoring Committee may make appointments to view the storage equipment and video monitoring stations to ensure compliance with the University's CCTV policy.
 - 1) A list of current committee members will be posted in the PennComm Center and will be updated annually.
 - 2) Panel members will be given full cooperation when requesting to view the storage equipment and to monitor procedures for compliance.
 - 3) UPPD command personnel will be notified immediately whenever a committee member requests to view the equipment or to monitor procedures.
 - 4) All committee inspections will be noted on the UPPD Sending and Receiving Sheet (UPPD-8).
- c. Anyone not specifically mentioned in this directive requesting to review stored video images must contact the office of the Vice President for Public Safety, the Chief of Police, or the Director of Security and Technical Services between 9:00 am and 5:00 pm Monday through Friday.
- d. Under no circumstances will civilian alarm monitoring operators or supervisors be permitted access to stored video images or video recording equipment.

2. Video Image Recording Equipment

- a. Video image recording equipment will be stored and locked in the security tape cabinet located in room 106 of UPPD Headquarters.
- b. Keys to the equipment cabinets shall remain in the possession of Security Services personnel.
- c. Video images will not be stored for longer than 30 days unless they need to be retained as part of a criminal investigation, court proceedings (criminal or civil), or other bona

vide use as approved by the Vice President of Public Safety and the CCTV Monitoring Panel.

3. Review and Dissemination of Information

- a. All personnel will adhere to the **“University of Pennsylvania Policy for Closed Circuit Television Monitoring and Recording of Public Areas for Safety and Security Purposes”**.
- b. Only authorized management, police and detective personnel are permitted to access and review stored video images.
- c. Authorized personnel wishing to access and review stored video images for any reason must enter all required information into the password protected digital video access system. All authorized personnel must receive training in the use of the digital access system and must be familiar with both this directive and the University CCTV policy.
- d. Duplication or printing of stored video images is prohibited unless approved by the Vice President fo Public Safety, Chief of Police, or the Deputy Chief of Investigations.
- e. Conversion of stored video images from digital to analog formats is prohibited unless approved by the Vice President for Public Safety, Chief of Police, or the Deputy Chief of Investigations.

4. Performance Evaluation

- a. UPPD, Security Services, and civilian dispatch supervisory personnel will periodically and without prior notice have CCTV operators demonstrate their knowledge and understanding of relevant policies, procedures, and technical skills.
- b. The Security and Technical Services Department shall be notified of any performance or operational issues or deficiencies.
- c. The Security and Technical Services Department shall have primary responsibilities for initiating remedial action.

5. Impairment

- a. Under no circumstances shall anyone, except professional factory trained service technicians attempt to service, repair, or tamper with any of the CCTV or video recording equipment.
- b. The Security and Technical Services Department shall have primary responsibilities for initiating remedial action.

6. System/Equipment Failure

- a. Upon the failure of a CCTV component, CCTV monitoring personnel shall immediately notify the PennComm Police Supervisor.
 - 1) If the failure is contained to an individual component, the PennComm Police Supervisor shall notify the Security and Technical Services Department during their regular business hours. If the failure occurs after hours, the PennComm Police Supervisor shall document the equipment failure on the UPPD Sending and Receiving Sheet (UPPD-8) and request that the Security and Technical Services Department is notified the following business day.
 - 2) If the failure is system wide, the PennComm Police Supervisor shall document the failure on the UPPD Sending and Receiving Sheet (UPPD-8) and immediately notify Security and Technical Services personnel utilizing the Emergency Contact Callout List, located in the alarm monitoring console inside the PennComm Center.

E. Compliance

Violations of this directive, or portions thereof, may result in disciplinary action.

F. Officers Assigned to Other Agencies

Officers of this department assigned to or assisting other law enforcement agencies will be guided by this directive.

G. Application

This directive constitutes departmental policy, and is not intended to enlarge the employer's or employee's civil or criminal liability in any way. It shall not be construed as the creation of a higher legal standard of safety or care in an evidentiary sense with respect to third party claims insofar as the employer's or employee's legal duty as imposed by law. Violations of policy will only form the basis for departmental administrative sanctions. Violations of law will form the basis for civil and criminal sanctions in a recognized judicial setting.