

# Proper Use of Security Cameras

## Operator Training

# U-M Standard Practice Guide

- A new SPG (606.01) covers Security Camera Systems
- SPG regulates:
  - Installation of cameras
  - Use of camera systems
  - Retention of images
  - Release of images

# Who does this apply to?

- SPG applies to any:
  - U-M Unit
  - U-M Department
  - U-M Employee
  - Contractor
- A security camera is a system installed **primarily** for security purposes

# What is excluded?

- Clinical patient care areas
- Human subjects research
- Teaching and learning
- Video conferencing
- Human resources
- Law enforcement
- Cases where an exemption is made

# Policy for Camera Operators

- Any operator of a security camera system shall comply with the SPG
- An operator is anyone able to access or release images captured by a security camera system

# Fourth Amendment

The Fourth Amendment prohibits the government, including public schools, from conducting unreasonable searches or seizures.

Courts have generally held, however, that what an individual knowingly exposes in plain view to the public will not trigger Fourth Amendment protection because no search has occurred.

# Fourth Amendment

SPG:

*“Security camera systems generally cannot be installed in areas where there is a reasonable expectation of privacy.”*

For example:

- Restrooms
- Locker rooms
- Occupied student residential rooms

# Sensitive Information

- Images recorded by security camera systems are considered **sensitive information**
- Recorded images must comply with **SPG 601.27 Information Security Policy**



# Institutional Data

- Security camera images are also defined as **institutional data**
- Recorded images must comply with **SPG 601.12 Institutional Data Resource Management Policy**

# FOIA

- Freedom of Information Act (FOIA) requests for recorded images must be forwarded to the U-M FOIA Office.
- Only the FOIA office can make the determination if recordings can be released.

# Law Enforcement

- Departments must provide access to recorded images to the U-M Police Department as needed in connection with an ongoing criminal investigation.
- Coordinate with UMPD for any other outside law enforcement agency request
- Other internal unit requests shall be reviewed by the CFO office or DPSS prior to release

# Logs

- Units must maintain logs of activities for their camera systems. This should include:
  - Log of any review of video by operators
  - Requests for release
  - Unauthorized access or release
  - Disposal of recorded images when no longer needed

Logs may be manual or automated by software

# Prohibited Use

- Camera operators shall not:
  - Use systems in any manner inconsistent with SPG
  - Duplicate, modify or delete records beyond authorized needs
  - Monitor persons based on characteristics of race, gender, national identity, ethnicity, sexual orientation, disability, or other classifications in the U-M nondiscrimination policy

# Complete!

- Be sure to submit your form:  
[Security Camera System Operator Code of Conduct](#)
- Remember to review the materials regularly

Thank you!