

University of Colorado Boulder, Parking Services

Body-worn Cameras Video Policy

(Parking Enforcement and Events Team)

Introduction

The purpose of this policy is to regulate the usage of Body-worn Cameras Video Cameras by University of Colorado Boulder, Parking Services employees. Parking Enforcement Specialists and Parking Events Team members use body cameras in the normal course of daily operations. The Parking Enforcement Program Manager or delegate (PEPM) is the data custodian for all footage collected by these cameras. The PEPM will follow the IT and information security policies of the university related to data use. <https://www.cu.edu/ope/aps/6010>

Purpose

Body-worn Cameras have been authorized for use by Parking Department Staff for the following purposes:

- Ensuring staff safety
- Training and Customer Service review
- Evidential purposes for addressing complaints
- Any perceived breach of University Code of Conduct toward Parking employees

Operation of the Cameras

All staff using the cameras must have received Body Camera Operation training before being authorized to use a camera during interactions with the public.

- Cameras **must** be turned on for every interaction with the public.
- Cameras **should not** be turned on and left to film for the entirety of a staff member's shift.
- When engaging with a member of the public, the staff member must introduce themselves and inform the member of the public at the earliest opportunity that they are being recorded.
- Cameras can be activated without notification where the staff member believes the safety of staff or other individuals is at risk, and it is not reasonably practicable to provide prior warning.
- Cameras must be docked, and footage downloaded by the end of the staff member's current shift.

Training

- Training will be provided to staff on how to use the cameras before they are deployed for operational use.
- The PEPM is responsible for ensuring training is provided.

- A record must be kept of all staff who have received training and a staff member must not be given a camera until they have received appropriate training.
- Training should be assessed on an annual basis to ensure it is still relevant and that all changes to the law or operating procedure have been fully implemented.
- **Any contraventions of this policy may lead to disciplinary action up to and including termination.**

Access to Data

- The PEPM is the only member of Enforcement or Event staff that has access including editable access to this footage. Not all footage is viewed by the PEPM; only footage relating to a contact that enlisted a question, complaint or compliment is normally reviewed.
- Should footage need to be saved as part of an investigation or complaint or other reason as outlined in this policy, the PEPM will access the system to save the footage providing the request falls within the 31 day retention period as outlined below.

Retention

- Footage is stored for 31 days.
- After 31 days, new footage overwrites the old footage; there is no archive facility.
- Where footage has been identified as necessary for use for any reason as outlined in this policy within the 31 day period, it will be kept until the purpose for keeping it has been fulfilled.

Disclosures - Colorado Open Records Act (CORA) C.R.S. § 24-72-201 to 206.

- When a CORA request is received it must be forwarded to Office of the Chancellor.
- When the PEMP receives notice of a CORA request from the Office of Chancellor, the PEMP must immediately ensure that any relevant footage as specified is exported so that it is not deleted within the 31-day retention period.
- The PEMP must immediately notify the Assistant Director of Events and Enforcement (AD) or the Parking Director (PD) upon receipt of a CORA request.

Litigation Holds

- When the PEMP receives notice of a litigation hold from the Office of University Counsel (OUC) within the 31-day retention period, the PEMP must immediately ensure that the footage as specified in the litigation hold is preserved until further notice from the OUC.
- The PEMP must immediately notify the Assistant Director of Events and Enforcement (AD) or the Parking Director (PD) upon receipt of a litigation hold.

Disclosures – Law Enforcement Agency

- When Parking Services receives a request from a Law Enforcement Agency regarding footage, the request should be referred to the PEMP.
- When the PEMP receives a request from a law enforcement agency, the PEMP must ensure that any relevant footage as specified by the requestor is exported so that it is not deleted within the standard 31-day retention period.
- The PEMP must immediately notify the Assistant Director of Events and Enforcement (AD) or the Parking Director (PD) of a request from a Law Enforcement Agency.

Disclosures - Other Requests

- Other requests for footage or information recorded by, or about, the cameras must be forwarded to the PEMP as soon as received by Parking Services.
- The PEMP must immediately notify the Assistant Director of Events and Enforcement (AD) or the Parking Director (PD) of any other request. The AD or PD will engage OUC to determine whether the request will be fulfilled.

System Maintenance

- The Parking Services Department Body Cameras and associated software are provided by WolfCom. Devices are encrypted and footage can only be downloaded using the WolfCom WEMS Extractor 2.5 Program.
- Each camera can only be accessed by one specific computer, which was provided as part of the package bundle.
- The PEMP must ensure that all software updates are downloaded and installed as soon as they become available to ensure that adequate technical security is in place for this system.

Data Breaches

- Data breaches are unlikely as WolfCom system is a closed system with no connections to the internet. Body camera workstations, server storage, and docking station do not communicate with any system outside of itself.
- Access to any body camera related workstation is secured by badge accessed doors and multi-layered password protection of each of the workstations.
- Shift Supervisors must take responsibility for ensuring that their members of staff comply with this policy at all times.