

Surveillance System Administrators Committee (SSAC) Report

October 2020

Executive Summary

The Surveillance System Administrators Committee (SSAC) was established by University Policy 3-234 (Building Access and Surveillance Systems), which went into effect on July 1, 2019. The committee is charged with developing and implementing processes and procedures for SSAC oversight of surveillance systems. Under University Policy 3-234, a surveillance system is defined as a “system capable of monitoring and recording the presence or activity of persons in a given physical area of a University building or outdoor area,” that is both video camera and building access systems. Specifically, the charge of SSAC is development of a campus standard for systems, an inventory of existing systems on campus, development of a comprehensive registration system, education of the campus about requirements of the new policy, and development of a plan for removing and replacing systems not meeting the campus standard. After reviewing the current policy and associated rules, SSAC determined that no changes to the approved policy and rules are required. SSAC has focused on developing and implementing procedures and systems to support the policy.

Key Accomplishments:

- Reviewed University Policy 3-234 to guide SSAC planning and development
- Inventoried building access and video surveillance systems on campus, with an initial focus on centrally administered systems and those free-standing systems that are currently registered.
- Created rules, procedures, and processes for SSAC oversight of registration and data access requests, including criteria for positions authorized to operate surveillance systems, required annual training for all system operators and local operators, and audit requirements
- Established an administrative reporting structure to the Chief Safety Officer.
- Developed a process for reviewing new or proposed technology and reported concerns.

Plans for Academic Year 2021

- Roll out of updated registration and training systems in October.
- Implementation of audit system.
- Implementation of concern-reporting system.
- Inventory of free-standing surveillance systems and enforcement of requirement for registration for all systems and training for all system and local operators.
- Campus education about University Policy 3-234, including @theU and a website.
- Ad hoc review of new or proposed technology as required.

Introduction

The Surveillance System Administrators Committee (SSAC) was established by University Policy 3-234 (Building Access and Surveillance Systems), which went into effect on July 1, 2019. The committee is charged with developing and implementing processes and procedures for SSAC oversight of surveillance systems. Under University Policy 3-234, a surveillance system is defined as a “system capable of monitoring and recording the presence or activity of persons in a given physical area of a University building or outdoor area,” that is both video camera and building access systems. Specifically, the charge of SSAC is development of a campus standard for systems, an inventory of existing systems on campus, development of a comprehensive registration system, education of the campus about requirements of the new policy, and development of a plan for removing and replacing systems not meeting the campus standard.

President Watkins convened the first meeting of the committee on August 29, 2019 (Attachment A: *Surveillance System Admin Comm Charge*). SSAC initially met twice a month; it now meets monthly and on an *ad hoc* basis as needed.

Members:

- Harriet Hopf, School of Medicine, *SSAC Chair*
- Michele Ballantyne, Office of General Counsel
- Dustin Banks, U Hospitals and Clinics
- Chris Bone, Human Resources
- Brian Burton, Student Affairs
- Duncan Campbell, Campus Building Access Team
- Stephen Cavanaugh, student
- Ryan Doyle, Director, Security & Law Enforcement Technology
- Leslie Francis, S.J. Quinney College of Law
- Ian Godfrey, Marriott Library
- Steve Panish, U Health
- Corey Roach, Chief Information Security Officer
- Keith Squires, Public Safety Executive Officer
- Kaitlyn Stevens, student
- Suresh Venkat, School of Computing

Process

At the first meeting, SSAC members agreed to meet every two weeks initially, during the inventory and planning phase; SSAC moved to monthly meetings in March. SSAC identified four major goals for the first year:

1. Inventory surveillance and access systems
2. Ensure data and use integrity, access, oversight, and confidentiality
3. Develop a process for registering all systems
4. Develop a process for identifying buildings / units not in compliance.

Several organizational changes were made over the course of the first year, both to committee membership and to reporting structure. University Policy 3-234 designated that SSAC report to the Vice President for Administrative Services (or equivalent). With the departure of the Vice President for Administrative Services, SSAC initially reported to the Chief Financial Officer, transitioning to the Chief Safety Officer once Marlon Lynch was appointed to the role in January.

Rick McLenon originally served as the Public Safety representative to SSAC. With his departure and the reorganization of Safety resources on campus, two new Safety representatives were appointed: Keith Squires, Public Safety Executive Officer (in July 2020) and Ryan Doyle, Director of Security and Law Enforcement Technology to the Committee (in September 2020). The addition of a member with expertise in Information Technology and Information Security is in process.

Inventory of Systems

Video Systems

The primary centralized video surveillance system at the University of Utah is through Avigilon. Avigilon services 125 buildings and 30 parking lots with a total of 3985 active cameras. There are 350 registered Avigilon operators.

In addition there are seven free-standing (stand-alone) systems (comprising 700-750 cameras) that are not directly operated or controlled by Building Access and Security Systems:

- 1) Red Butte Gardens – Estimated 40 cameras
- 2) Student Union – Estimated 50 cameras
- 3) Student Life – Estimated 50 cameras
- 4) Hospital Pelco System – 483 cameras
- 5) U of U Book Store – Estimated 60 cameras
- 6) 700 Student Housing Court - Independent Cameras – estimated 35
- 7) Unknown sites in the Bio/Vivarium area—unknown number of cameras
- 8) While unlikely (due to procurement and enforcement efforts), it is possible that there are several independent Costco style set ups still in play. Unfortunately, we have not yet discovered their locations.

All systems and cameras in the central (Avigilon) system are registered.

One free-standing (stand-alone) system, the one at Red Butte Gardens, is registered.

Seven free-standing (stand-alone) systems are not yet registered.

Building Access Systems

The primary centralized building access system on campus is C*Cure. There are 368 buildings on campus, of which 211 are key access only, 131 are fully controlled or partially controlled by C*Cure. The remainder employ a variety of systems, which do not connect centrally. C*Cure building access systems are used on both exterior doors (750) and interior doors (5120). Only

C*Cure doors have centralized lock-down capacity (active for 55 buildings). There are 886 registered C*Cure operators. See table below for full details.

Access Control Systems	# of Buildings	Fully Controlled	Partially Controlled	Lock-down Capability	# of Exterior Door Readers	# of Interior Door Readers
C*Cure 9000	131	55	76	55	750	5120
Kaba	1	0	Interior Doors Only	0	0	?
Aboly Persona	2	0	2	0	0	?
RS2	19	18	1	?	?	?
Mag stripe	?	N/A	N/A	N/A	N/A	N/A
Prox Wafer	?	N/A	N/A	N/A	N/A	N/A
Department designed system	4	0	Interior Doors Only	0	0	?
Keyed Only	211	N/A	N/A	N/A	N/A	N/A
Total	368	73	79	55	750	5120

Notes:

- Fully Controlled: all exterior doors are monitored either electronically, by time schedule or reader installed on door.
- Partially Controlled: the exterior doors are keyed or electronically controlled.
- On average, there are 110,000 card swipes per day on C*Cure.

Progress in Implementing Policy 3-234

1. Compiled a comprehensive list of duties / expectations for SSAC from Policy 3-234 (Attachment B: *SSAC Duties 9-24-19*)
2. Reviewed surveillance and building access maps provided by Duncan Campbell (Campus Building Access Team) to get a sense of the scope of current university video surveillance and building access systems. These included main campus and off-campus/community locations.
 - a. The maps highlighted opportunities for enhanced security at certain locations.
 - b. The SSAC identified a need to develop a minimum standard for building access for buildings not held to a higher standard by other policies, laws, or regulations.
 - i. Funding to begin that process was included in the AY 21 budget; completion will require several years.
 - c. New construction and renovation provide an opportunity to require updating building access and surveillance. The SSAC supports eventually requiring all surveillance and building access systems to use a central system (currently Avigilon and C*Cure) unless specifically exempted after a review.
3. Assessment of practices at other institutions: SSAC developed a list of questions regarding common / effective practices for oversight of surveillance and building access (Attachment C: *Questions Regarding Oversight of Surveillance and Building Access*) that were sent to a number of contacts of committee members at comparable institutions. The safety websites of comparable institutions were also reviewed. Neither yielded much concrete information. Marlon Lynch, Keith Squires, and Ryan Doyle all have experience with SSAC-equivalent oversight of surveillance and building access, which has been valuable to the committee.

4. Existing system and operator registration forms were revised to incorporate changes required by University Policy 3-234 and oversight by SSAC. The new system will be fully online and require completion of annual training. It will go live in October to replace the existing Facilities Management registration system. SSAC will continuously evaluate the system and implement updates and revisions as the need arises.
5. Access to data is governed by University Policy 3-234. For a number of time-sensitive, safety-related purposes (e.g., criminal activity, potential for serious harm, or student safety), no request to SSAC will be required before accessing data; SSAC will periodically review data access audits to ensure policy and procedures are being followed. GRAMA requests and requests related to legal proceedings will be reviewed by the Office of General Counsel and forwarded to SSAC for review as needed. For other purposes (e.g., HR), SSAC review is required. The online request system will go live in October and replace the current Facilities Management system. SSAC will continuously evaluate the system and implement updates and revisions based on usage and experience.
6. Inventory of surveillance and video access systems. All centrally administered (Avigilon and C-Cure) surveillance and access systems are already registered. Some free-standing/stand-alone systems are also registered, although identifying all free-standing systems remains a challenge. All systems will be required to be re-registered annually, including registration and training of system operators and local operators. This will ensure ongoing awareness of and compliance with the policy.
7. The Office of the Chief Safety Officer (<https://cso.utah.edu/>) will host the SSAC Website. The website will include a description of the committee, a list of SSAC members, links to the policy, registration and access forms, training, and standards and specifications, and a link for contacting SSAC with questions or concerns.

New Technology Reviews

One important role for SSAC is to review new technologies and proposals for surveillance and building access at the University of Utah, especially as they relate to privacy and compliance with Policy 3-234. The potential value of SSAC review was highlighted by the state-facilitated, now terminated, university contract with Banjo, a company that applies artificial intelligence to video data with the intent of improving response times by Public Safety officers. Although SSAC was not consulted in that process (which began before Policy 3-234 went into effect in July 2019), the experience led to SSAC being consulted in March to review a potential option for technology-assisted contact tracing. This role will increase as awareness and knowledge of SSAC increase.

Plans for AY 2021

1. Roll-out and revisions of system and employee registration, data access requests, training, and data access audits.
2. Campus education.
3. Mechanism for reporting concerns to SSAC. Over the past year, SSAC has reviewed several concerns identified by committee members or raised by other campus

community members to SSAC. This year, SSAC will develop a formal, online mechanism for reporting of concerns, and for reviewing and resolving those concerns.

4. Inventory of free-standing surveillance and building access systems. Facilities Management has compiled a list of free-standing surveillance and access systems, as noted above. Over the next year, SSAC will contact each unit leader (dean, chair, director, etc.) to determine the existence of additional free-standing systems and ensure their registration and compliance with Policy 3-234.
5. SSAC is working with Procurement and IT / Information Security to identify planned purchases of free-standing systems and ensure they meet the requirements of Policy 3-234.