Swansea University
CCTV Statement

The CCTV System

Swansea University (the "University") is the owner of a public closed circuit television system (CCTV) currently installed on the Campus and in/on University buildings off Campus; in addition the system incorporates an automatic number plate recognition system (ANPR) and body worn cameras. The University is also in the process of sourcing mobile CCTV camera systems to deploy in current blind spot areas to deal with illegal activities as they arise.

For the purpose of this document these systems together will collectively be known as the CCTV system.

Cameras are located in various areas around Singleton Campus, Bay campus and off campus buildings including: -

i.	Car Parks
ii.	Academic buildings
iii.	Service buildings
iv.	Bars
v.	Student Union
vi.	Accommodation
vii.	Shops

There are several types of camera: -

i.   Overt fixed – these record uncontrolled images e.g. reception desk, doors etc.

ii.   Overt Pan, Tilt and Zoom (PTZ) – these controllable cameras can follow vehicles or subjects when required. It should be noted that PTZ cameras deployed across the university have auto tracking and roaming functions.

iii. Body worn cameras – used by security staff when on patrols and dealing with drunkenness, violence and anti-social behaviour. They may also be used for incidents where evidence may be required for an investigation into root causes.

iv.   Mobile CCTV cameras – temporary fitted cameras used in areas not covered by CCTV but the scene of persistent criminality or compliance issues.

v.   ANPR – these record vehicle number plates together with a date and time stamp, which are used in traffic management and parking enforcement.

vi.   The university also utilises CCTV cameras dedicated as teaching aids and remote monitoring of AV equipment to deal with faults and safe operating procedures.

The cameras cover roadways, car parks, buildings, vulnerable public facing offices, academic buildings and licensed premises. The cameras are also deployed in depth in access corridors and lift areas to late opening areas.

Images are recorded on Network DVR's which are held locally within departments or centrally on servers in ISS; they are all viewable centrally by security staff at the security control rooms. In addition,

a limited number of management staff have the facility of monitoring cameras sited within their own areas of responsibility to monitor legal compliance (bar managers) safety (laboratory staff), fault finding (ISS), teaching aids (colleges) and anti-social behaviour (Residential Services).

The objectives for the use by security of the CCTV system are-

i.   Assist in providing a safe and secure environment for the benefit of those who might visit, work, study or live on the campus or off campus university buildings.
ii.   Reduce crime and the fear of crime by reassuring students, staff and visitors
iii.   Deter and detect criminal behaviour, public disorder and anti-social behaviour.
iv.   Identify, apprehend and prosecute offenders in relation to criminal behaviour, public disorder and anti-social behaviour.
v.   Provide the Police, Health and Safety Executive and the University with evidence upon which to take criminal, civil and disciplinary action respectively.
vi.   Monitor crowd dynamics during University events ensuring crowd safety.
vii.   Monitor and assist with traffic management, parking enforcement and waste management.
viii.   Assist in the monitoring and deployment of security staff during normal duties and for incident management in emergencies.
ix.   Protect, staff, students and visitors from undue threats and violence
x.   Obtain evidence for use in the investigation of criminal actions, breaches of health and safety legislation and breaches of student and staff disciplinary procedures.

Type of Personal Data	How we use that data	The lawful basis for processing that data
Images of individuals and their vehicles on and around Swansea University and in its buildings on Singleton Campus, Bay Campus, and remote university buildings.	To prevent crime and protect buildings and assets (of Swansea University, of other occupants of the buildings and of their respective staff and visitors) from damage, disruption, vandalism and other crime.	The legitimate interests of staff and visitors and of Swansea University and other occupants of the buildings in protecting the buildings and their assets. The prevention and detection of crime. Article 6(1)(e)
	For the personal safety of staff, students and visitors (of Swansea University and of other occupants of the building) and other members of the public and to act as a deterrent against crime.	The legitimate interests of staff, students and visitors in being safe and the legitimate interests of Swansea University and other occupants in keeping their staff and visitors safe. This will include the University's legal duty of care. Article 6(1)(f)

	To support law enforcement bodies in the prevention, detection and prosecution of crime.	The legitimate interests of staff and visitors and of Swansea University and other occupants of the buildings in preventing crime and helping to detect and prosecute crime. The prevention and detection of crime. Article 6(1)(e)
	To assist in the day-to-day management, including ensuring the health and safety of staff and visitors (of Swansea University and of other occupants of the building)	The legitimate interests of Swansea University and other occupants in managing their businesses and ensuring the health and safety of their staff, students and visitors. Article 6(1) (f).
	To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings with staff (of Swansea University or of other occupants of or visitors to the building)	The legitimate interests of Swansea University and other occupants of or visitors to the building in resolving disputes which arise in the course of disciplinary or grievance proceedings The recording of information for the purposes of an investigation into crime, disciplinary issues and for the purposes of health and safety. Article 6(1)(f)
	To assist in the defence of any civil litigation, including employment tribunal proceedings (involving Swansea University or other occupants of or visitors to the building)	The legitimate interests of Swansea University, other occupants of the building and visitors to the building in bringing or defending any civil litigation proceedings. The vital interests of an individual or that of a third party. Article 6(1)(d)

Information Flows

The recorded images are stored on Network DVR's located in departments throughout the campuses and accessed by security staff and designated managers in accordance with the University CCTV policy, which has been agreed following consultation with interested stakeholders (pending).

The guidance is reviewed annually and deals with aspects of data protection, storing and viewing of images, signage, disclosure and general use of the system.

Privacy Risks and Mitigation

The use of CCTV is a sensitive area in relation to the privacy of individuals as it is directly recording actions by staff, students and visitors alike.

The information Commissioner's Office, Data Protection Act 2018 and General Data Protection Regulations set down guidelines and/or regulation the use and management of such systems.

The privacy risks include: -

No.	Privacy Risk	Mitigation
1	Accommodation blocks – view of student bedrooms	Pixel blocking of all viewable student accommodation windows
2	Showers/changing rooms	No cameras fitted in these areas
3	Office /reception areas	Consultation with staff before fitment into these work areas. Clear signage on entry. Strict conditions of disclosure.
4	Sports performance and tactical espionage opportunities	Strict disclosure rules set down in the Codes of Practice
5	Social space monitoring	Signage at entry points of such spaces and strict control of disclosure
6	Issues of trust if the system is abused	Good training of staff to ensure that the highest integrity is maintained when viewing and dealing with CCTV images.
7	Reputational damage to Security Services or the University	Good training of staff to ensure that the highest integrity is maintained when viewing and dealing with CCTV images.
8	Unauthorised disclosure to individuals or third party organisations.	Rigorous application of CCTV request procedure.
9	Subject access requests.	Application of subject access request procedures with strict anonymization of images.

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                    │   University    │
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│ CCTV PTZ,     │  │ CCTV Mobile   │  │ Body Worn     │
│ fixed camera  │  │ camera. (Not  │  │ Camera.       │
│ / ANPR        │  │ yet deployed).│  │               │
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│ Security  │ │ Security  │ │ Security  │ │ Managers  │
│ View in   │ │ View in   │ │ Review in │ │ View in   │
│ Control   │ │ Library   │ │ Remote    │ │ Remote    │
│ Room      │ │           │ │ Viewer    │ │ Viewer    │
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           │ CCTV Footage Request completed via│
           │ Control Room subject to CCTV request│
           │ authorisation process.            │
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