

Estate Management Camera Surveillance Procedure

Procedure Hierarchy Link			
Responsible Officer		Chief Property Officer	
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1. Preamble

UNSW Protective Services installs and maintains surveillance cameras across UNSW campuses, covering external grounds and internal areas of buildings. Surveillance cameras include closed-circuit television (CCTV), Body Worn Cameras (BWCs) and licence plate recognition (LPR) cameras.

CCTV is installed for the primary purposes of deterring crime, monitoring incidents and events, scheduled virtual patrols and post-incident investigation. The CCTV system supports UNSW Protective Services ensuring a safe and secure campus environment for the campus community.

LPR cameras are installed at vehicle entry and exits points to UNSW campuses and throughout carpark for the primary purpose of collecting data on carpark usage trends, to support post-incident investigations, and to monitor and determine if correct parking fees have been paid.

Body Worn Cameras (BWCs) are commonly worn by UNSW Protective Services to deter and detect unlawful behaviour, enhancing the safety and Protective Services of staff, students and property.

The use of the surveillance cameras and any recorded visual images or data is subject to several legal obligations, including NSW workplace surveillance and privacy laws. This procedure is intended to supplement and ensure UNSW’s compliance with these laws.

2. Definitions

Camera Surveillance	Surveillance by means of a camera that monitors or records visual images or data of activities on premises or in any other place.
Incident	An incident of actual or suspected criminal activity or other misconduct. Means any of the following:
Law Enforcement Agency)	(a.) NSW Police; (b.) a police force or police service of another State or a Territory; (c.) the Australian Federal Police; (d.) the Police Integrity Commission; (e.) the Independent Commission Against Corruption; (f.) the New South Wales Crime Commission; (g.) the Australian Crime Commission; (h.) the Department of Corrective Services; (i.) the Department of Juvenile Justice; (j.) any other authority or person responsible for the enforcement of the criminal laws of the Commonwealth or of a State; and (k.) a person or body prescribed as a law enforcement agency by any regulations made under the Workplace Surveillance Act 2005 (NSW).
Other Surveillance	Has the meaning given in Section 6(c) below.
Surveillance Camera	Includes a CCTV camera and a LPR camera
CCTV Camera	A closed-circuit television camera, is a surveillance device used to monitor and record video footage in a specific area or location
LPR Camera	A camera that records licence plate numbers from vehicles passing within the range of the camera and capture such information in data form.

Body Worn Cameras (BWC) A body-worn camera is a small, portable device attached to the wearer's clothing that records video and audio from their perspective. It is used to document interactions and events in real-time

University Premises Has the meaning given in Section 6(b.) below.

3. Regulatory Framework

This procedure is made in accordance with UNSW's obligations under the:

- (a.) *Privacy & Personal Information Protection Act 1998* (NSW); and
- (b.) *Workplace Surveillance Act 2005* (NSW).

4. Objectives

- (a.) The University's use of Surveillance Cameras will be governed by this procedure.
- (b.) No Surveillance Camera may be installed or operated on University Premises unless done so in accordance with this procedure.
- (c.) Any member of staff who believes a Surveillance Camera may be in use on University Premises other than in accordance with this procedure should notify the Director Protective Services.

5. Purpose

- (a) The University will only install and/or operate Surveillance Cameras for one or more of the following purposes:
 - (i) to enhance the security of University Premises and persons on University Premises;
 - (ii) to protect the assets and property of UNSW and persons on University Premises, including employees, students and visitors;
 - (iii) to assist in the identification and prosecution (or taking of other disciplinary steps) of persons in relation to criminal or other misconduct.
 - (iv) to assist in deterring potential offenders;
 - (v) to assist in investigating incidents in and around campus;
 - (vi) to monitor incidents, events, emergencies and critical incidents as they unfold; and/or
 - (vii) for statistical and analytical purposes (for example, counting the number of persons using a particular area of the UNSW campus).

6. Scope and Exclusions

- (a.) This procedure applies to the University's use of Camera Surveillance in all University land and buildings, other than the University College at ADFA campus, Canberra.
- (b.) In particular, this procedure applies to Camera Surveillance in the University's:
 - (i) Public spaces – that is, indoor and outdoor spaces generally open to University staff, students and contractors;

- (ii) Teaching spaces – for example, lecture halls; seminar and teaching rooms; teaching and computing laboratories; libraries; graduation, assembly and performance spaces; and other specialist spaces made available to students for educational purposes;
- (iii) Work spaces – that is, offices, research laboratories, meeting rooms and other workspaces generally restricted to or used solely by UNSW staff or contractors;
- (iv) Residential spaces – including foyers, hallways and common spaces generally restricted to residents (students) and their authorised visitors; and
- (v) Miscellaneous or common spaces – including stairwells, hallways, elevators, walkways, foyers, entryways and other miscellaneous or common spaces associated with any of the above;

collectively, **University Premises**.

(c) This procedure does not apply to:

- (i) Covert surveillance – which is governed by law and by any then-current UNSW covert surveillance procedure;
- (ii) Surveillance by means other than Surveillance Cameras, including:
 - a. Telephony surveillance (monitoring/recording of telephone calls);
 - b. Computer surveillance (monitoring of emails, internet and networking usage);
 - c. Tracking surveillance (the use of electronic tracking devices such as GPS devices to track location or movement);
- (iii) Surveillance of change rooms, toilet facilities, shower and other bathing facilities and any other spaces not identified as part of the University Premises above;

collectively, **'Other Surveillance'**.

7. Use of Camera Surveillance

Surveillance Cameras may be installed and operated and Camera Surveillance may be conducted, on University Premises:

- (a) only by or under the supervision of UNSW Protective Services Management; and
- (b) only in accordance with this procedure.

8. Determining Requirement for a new Surveillance Camera

(a) No Surveillance Camera may be installed, or its location varied, unless:

- (i) the Director Protective Services, Faculty Executive Director or a Business Unit Director first:
 - considers that a genuine need for a Surveillance Camera exists, that is, by reference to the purposes set out in this procedure; and
 - for a CCTV camera only, completes the form *UNSW CCTV 1: Request to Install a New Camera or Vary an existing installed CCTV Camera* (Request Form).
- (ii) on receiving or completing a Request Form (as applicable), the Director Protective Services determines that a genuine need for any proposed Surveillance Camera exists, by reference to the purposes set out in this procedure.

- (iii) the requirements of clause 11 (regarding signage and notice) are complied with.
- (b) If the Director Protective Services cannot determine whether a genuine need has been established, he or she must consult with Legal & Compliance before making a final determination.
- (c) All Surveillance Cameras that are installed will be restricted to the UNSW Protective Services closed virtual local area network (VLAN). Video images and data will only be accessible and able to be viewed by UNSW Protective Services. In distinct cases, where a Faculty staff member needs to view CCTV footage from Surveillance Cameras that have been installed within their area of responsibility (for example, specialised labs, highly restricted areas), these cameras will be installed onto a separate secure network which is managed and operated by the requesting Faculty. In this instance, the Faculty is responsible for the maintenance of the CCTV equipment and must adhere to the clauses outlined in this procedure.

9. Determining Ongoing Requirement for Existing Surveillance Cameras

At least once every two years, the Director Protective Services and the Security Technical Services Manager must endeavour to review all Surveillance Cameras operating on University Premises and consider whether the genuine need for any Surveillance Camera has ceased to exist. If a genuine need for any Surveillance Camera has ceased to exist, such Surveillance Camera shall be removed.

10. Relocating a Surveillance Camera

Where an existing Surveillance Camera is to be relocated, that relocation is to be treated as the installation of a new Surveillance Camera, in accordance with clause 7 and the procedures set out in Clause 8 must be followed.

11. Signage and notice requirements

In accordance with the *Workplace Surveillance Act 2005* (NSW), at a reasonable period of time before the use of overt surveillance using a Surveillance Camera, notice must be given to University employees in the following ways:

- (a) All UNSW employees working at a University Premises property at which Camera Surveillance will occur must be notified in writing (for example, by email), at least 14 days (or a lesser period agreed to by the employee) before commencement of the Camera Surveillance. If the Camera Surveillance has already commenced when a UNSW employee is first employed or is due to commence less than 14 days after an employee is first employed, the notice to that employee must be given before the employee starts work.
- (b) The notice must indicate:
 - (i) that surveillance is being carried out using a Surveillance Camera.
 - (ii) when the surveillance will start.
 - (iii) whether the surveillance will be continuous or intermittent; and
 - (iv) whether the surveillance will be for a specified limited period or ongoing.
- (c) Signs notifying people that they may be under surveillance in the location where the surveillance is taking place must be clearly visible at each entrance to that place. All Surveillance Cameras (or the camera casings or other associated equipment that would indicate the presence of a Surveillance Camera) must be clearly visible in the location where the Camera Surveillance is taking place.

12. Storage and retention of recorded images and data

- (a) Images and data collected by Surveillance Cameras may only be monitored from the offices of UNSW Protective Services Management and those authorised under supervision of UNSW Protective Services Management. Access to those systems will be controlled to ensure that only authorised personnel have access to Surveillance Camera images and data.
- (b) Images and data will not be retained for more than 30 days by UNSW Protective Services Management, other than where an Incident has been reported or detected or where the University has been asked by a Law Enforcement Agency (in accordance with clause 14 below) to retain or produce the images or data. Any images and data to be deleted must be done so in a secure manner that minimises any risk of loss or misuse.
- (c) Images from Faculty installed and managed CCTV cameras may be retained for longer periods of time as determined by the Faculty General Manager.
- (d) Retained images and data must be stored, retained, and managed so as to ensure access is limited to authorised persons and only permitted for purposes which are consistent with this procedure and approved by the Director Protective Services or the Chief Property Officer.
- (e) If an Incident is reported or detected, the Director Protective Services may approve the further retention of:
 - (i) images of that incident captured by CCTV cameras;
 - (ii) data captured by LPR cameras relevant to the incident; and/or
 - (iii) data captured by BWCs
 - (iv) images captured by CCTV cameras of other places and times that may be relevant to the proper investigation of the Incident,

where reasonably necessary, and only for so long as reasonably required, to avoid frustrating the purposes of this procedure.
- (f) A decision to retain images or data for more than 30 days must be recorded in writing, providing an explanation and/or reasons for the decision.

13. Use of recorded images and data – Generally

- (a) Images and data from Surveillance Cameras will not be routinely reviewed but may be monitored and/or reviewed solely for the purposes of this procedure and:
 - (i) In the first instance, solely by authorized personnel under the direction of the Director Protective Services; and
 - (ii) By other persons authorized to access such images and data by the Director Protective Services, in accordance with this procedure.
- (b) Data collected from LPR cameras will be matched with parking permit holder information for the purpose of monitoring compliance with the terms and conditions of parking permits, and for the purposes outlined in section 14 below.
- (c) Data collected from BWCs is temporarily stored on the device until it is docked for charging. Once docked, the footage is saved (in accordance with this document).

14. Use of Recorded Images and Data – Investigations and/or Disclosure to Law Enforcement Agencies

- (a) The Director Protective Services and delegated personnel within UNSW Protective Services may provide still images, video images and data from Surveillance Cameras to persons who are conducting or responsible for UNSW disciplinary investigations, and/or Law Enforcement Agencies for the purpose of their investigation of an Incident.
- (b) The Director Protective Services authorises the UNSW Defence Industry Security Officers to review images and video from Surveillance Cameras in designated research spaces for the purposes of suspected criminal, misconduct or contractual breach matters in designated research spaces.
- (c) Provision of images and data may be at the initiative of the Director of Protective Services, in furtherance of a report to local police of an Incident or may arise from a legitimate request by a Law Enforcement Agency for provision of images.
- (d) UNSW Camera Surveillance images and data will only be reviewed when an official UNSW security incident report is made and/or a police event number is provided. The report must be related to a suspected criminal or misconduct matter, health, safety and wellbeing matter and/or a contractual breach.
- (e) Where a Law Enforcement Agency or court demands or otherwise requires that the University provide Camera Surveillance images or data by authority of a warrant, subpoena, summons, notice to produce or other compulsory legal process, the matter must be referred to Legal & Compliance for validation and approval.
- (f) Disclosure in accordance with this clause may be made subject to reasonable restrictions on misuse or further disclosure of any included personal information, in accordance with the *Privacy and Personal Information Protection Act 1998* (NSW).

15. Use of Recorded Images - Public Display

- (a) Video and still images from a Surveillance Camera may be displayed by the University in a public place within University Premises, solely in accordance with this Clause 15.
- (b) Video and still images must not be displayed in public places unless approved by the Director Protective Services in consultation with the Chief Property Officer and/or the University Solicitor.
- (c) The Director Protective Services must only approve such public display where it serves a purpose reasonably ancillary to the legitimate purpose of the Surveillance Camera in question.
- (d) The ancillary purposes referred to in clause 15(c) include, in relation to video images:
 - (i) To deter unlawful behavior by demonstrating that the actions and activities of people in an area or passing through an entrance or barrier are being monitored; and
 - (ii) To inform people of the existence of a Surveillance Camera in the immediate area.
- (e) The ancillary purposes referred to in clause 15(c) include, in relation to still images:
 - (i) To seek assistance from members of the University community in identifying a person reasonably suspected or known to have committed an offence; and
 - (ii) Warning people of a danger to personal safety or loss of personal property associated with such a person.

16. Complaints

- (a) Persons with complaints or enquiries regarding the purpose, collection, use or other aspects of Camera Surveillance on University Premises should be directed to this procedure, and/or the Director Protective Services or UNSW Privacy Officer.

- (b) Complaints received in relation to the operation of Surveillance Cameras must be considered and addressed by the Director Protective Services and/or UNSW Privacy Officer in consultation with the University Solicitor and in accordance with the *Privacy & Personal Information Protection Act 1998* (NSW) and *Workplace Surveillance Act 2005* (NSW) and any Regulations made under those Acts.

17. Audit & Review

At least every two years, the Director Protective Services must endeavour to review the operation and management of Surveillance Cameras on University Premises, including the gathering, storage, distribution and destruction of images, to ensure UNSW Protective Services and other staff are acting in compliance with this procedure. This procedure will also be reviewed every two years to ensure it reflects current legislation. Modifications to this procedure will be recorded in the amendment history table below.

The authorisation and amendment history for this document must be listed in the following table. Refer to information about [Version Control](#) on the Procedure website.

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