

Reference: FOI 25044											
Details of the request:	Summary										
<p><b>QUESTIONS</b></p> <p>Please provide the following information:</p> <p>(1) From 1 July 2023 to date (11 March 2025) has your university used any external company to provide any of the following services:</p> <p>A. Private investigations into individuals or groups (eg misconduct investigations, research on speakers)</p> <p>B. Intelligence gathering, eg social media monitoring</p> <p>C. Overt/covert surveillance, eg physical monitoring of people</p> <p>D. Facial recognition</p> <p>(2) If you answered yes in relation to any parts to Q1, please provide:</p> <p>A. The name of the external company(s)</p> <p>B. The university's total expenditure on the services provided by that company for the last three financial years</p> <p>(3) For each company listed in response to Q2A, please state:</p> <p>A. Why its services were used (eg misconduct investigations)</p> <p>B. Whether the use was in relation to individuals or groups who were of interest on account of political activism or protest activity and, if so, what cause their activity was in relation to (eg pro-Palestinian, environmental, animal rights)</p> <p>C. Whether students or staff were the subject of the services provided.</p> <p>(4) Copies of any and all Data Protection Impact Assessment screening checklists and Data Protection Impact Assessments conducted in relation to:</p> <p>A. Facial recognition</p>	<table border="1"> <tr> <td>LSBU is able to supply <b>all</b> of the information request.</td> <td style="text-align: center;"><b>x</b></td> </tr> <tr> <td>The information (or links to the information if it is already published) set out below.</td> <td></td> </tr> <tr> <td>LSBU is able to supply <b>part</b> of the information requested.</td> <td></td> </tr> <tr> <td>The information (or links to the information if it is already published) set out below, together with the reason for the partial response.</td> <td></td> </tr> <tr> <td>LSBU is unable to supply any of the information requests. Reasons set out below.</td> <td></td> </tr> </table>	LSBU is able to supply <b>all</b> of the information request.	<b>x</b>	The information (or links to the information if it is already published) set out below.		LSBU is able to supply <b>part</b> of the information requested.		The information (or links to the information if it is already published) set out below, together with the reason for the partial response.		LSBU is unable to supply any of the information requests. Reasons set out below.	
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- B. Private investigations into individuals or groups (eg misconduct investigations, research on speakers)
- C. Intelligence gathering, eg social media monitoring
- D. Overt/covert surveillance, eg physical monitoring of people

(5) Are members of the university's security team equipped with either:

- A. facial recognition cameras, or
- B. cameras capable of carrying out a facial recognition function if this functionality were to be switched on in the future

Please include any type of camera including body-worn cameras in the scope of this question, and specify in your answer whether A, B, or both applies

(6) Have university security staff used live or retrospective facial recognition technology to date? If yes, please specify whether this was live, retrospective, or both.

#### **BACKGROUND**

I am interested in information pertaining to your university's use of private companies to gather intelligence, carry out surveillance or conduct investigations on individuals, including (but not limited to) students, staff, external speakers and members of the public attending (or planning to attend) campus. I'm particularly interested in the use of these companies' services in relation to activities that could be considered activism or protest, as well as academics invited to give talks as internal/external speakers.

For the purposes of this FOI, please interpret activism/protest as including but not limited to the following activities: encampments, chanting, gatherings and demonstrations, written or verbal comments and flyering.

Please take a broad interpretation of activism/protest, including where an individual could be said to fall under the scope of this request because of what the university considers to be wider misconduct related to their activism, such as criminal damage, rather than specifically their involvement in activism.

I am aware that some universities have used the following companies to provide intelligence/surveillance/investigatory services (although please note this is not an exhaustive list):

- Horus Security Consultancy Limited/Horus Global
- Dataminr
- Mitie / Mitie Intelligence Hub
- Intersol
- Insight Investigations
- Settica
- Blackstone Consultancy

Other well known private intelligence firms include Palantir and BlackCube. Facewatch and Corsight AI meanwhile are examples of companies offering facial recognition services.

**Details of our response:**

**Exemption:**

Exemption	Applied?	Rationale
Section 21 – information already reasonably accessible		
Section 22 – information intended for future publication		
Section 22A – research information		
Sections 30 and 31 – investigations and prejudice to law enforcement		
Section 40(2) – personal information		
Section 43 – trade secrets and prejudice to commercial interests		

**Response:**

Service	Q1	Q2	Q3	Q4
<b>A – Private Investigations</b>	Yes	Intersol Global £81,048	Student Disciplinary cases; unrelated to political activism or protest activity	A DPIA was not required, use of 3rd party investigators undertaken with full transparency to both complainant and subject of the disciplinary. DSA in place.
<b>B – Intelligence gathering</b>	No	N/A	N/A	N/A
<b>C - Surveillance</b>	Yes	Mitie provide CCTV staff a part of a broad Managed Service Agreement so we are unable to provide figures for individual services	CCTV monitors space/property not individuals and is overseen by SIA Licensed contractor. Used for crime prevention, monitoring fire evacuations etc.	CCTV policy is publicly available, and signs are presented in locations where it is in use.
<b>D – Facial Recognition</b>	No	N/A	N/A	N/A

Q5 A&B) No  
Q6) No

If you wish to request a review, please set out in writing your reasons and send it within 2 months of the date of this letter to the Group Chief People and Legal Officer, London South Bank University, 103 Borough Road, London, SE1 0AA. We will aim to carry out the review within 20 working days, or in exceptional circumstances within 40 working days.

If you are not satisfied with the review decision, you have the right to complain to the Information Commissioner whose contact details can be found at <https://ico.org.uk/make-a-complaint/>