



## Strathclyde Partnership for Transport

### Privacy Notice - CCTV and BWV

#### Who we are/the service

Strathclyde Partnership for Transport (“**SPT**”) is, in terms of the Transport (Scotland) Act 2005, the Regional Transport Partnership (“**RTP**”) for the west of Scotland, covering 12 local council areas and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

SPT Operates Closed Circuit Television (“**CCTV**”) systems at:

- Each of our Subway Stations and associated car parks, and at our Broomloan Depot
- Seaward Street Store, Glasgow
- 131 St Vincent Street, Glasgow
- Buchanan, Hamilton, Greenock, and East Kilbride Bus Stations
- Govan and Partick Bus Interchanges

(“**Premises**”)

Cameras will not be hidden from view and signage informing the public of the presence of the system and its ownership will be prominently displayed.

In addition to the above, SPT also has the right to use Body Worn Video (“**BWV**”). Any images captured by BWV will be treated in the same manner as CCTV images.

This Privacy Notice explains how SPT uses personal data collected via CCTV and BWV.

#### Personal data we hold

- Static or moving images

#### How we obtain your personal data

SPT collects the above personal data via CCTV and BWV which capture images of events on or around our Premises in real time.

#### The purpose of processing your personal data

CCTV is used by SPT for the following purposes:

- the prevention, detection and investigation of crime;
- in the interests of public safety and security
- the management and monitoring of health, safety and security
- to allow SPT and third parties whom it expressly authorises, such as its external legal advisors, loss adjusters, insurers and insurance brokers, to investigate, defend and otherwise process and respond to any reports of loss, injury or damage on premises where SPT is responsible
- our management and administrative purposes as an employer and in the interests of safe, secure, effective and efficient provision of transport and services to the public
- to enable SPT managers with involvement in disciplinary processes within SPT where CCTV footage shows gross misconduct, unlawful activity or behaviour which puts others at risk to investigate and take appropriate action
- in relation to substantive health and safety matters, but should not be used for the routine monitoring of staff

## **The legal basis for using your personal data**

We process your personal data lawfully and fairly in accordance with data protection legislation.

Specifically, the following legal bases apply to the processing of the personal data we collect via CCTV and BWV:

- SPT's Public Task
- Vital interests
- Legal obligation

## **How we store your personal data/keep it secure**

SPT is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we collect from you.

## **The length of time we keep your personal data**

The personal data we collect via CCTV and BWV will be retained for a period of 31 days, after which they will be permanently deleted unless they are required in respect of an incident/ event within the footage, for example:

- where an offence has been committed
- where a risk to health and safety has been reported or identified
- where a risk to public safety and security has been identified

In such cases, SPT will retain this personal data for as long as it is necessary, reasonable and proportionate to do so, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT.

## **Sharing your personal data/ overseas processing**

CCTV footage is held within the UK.

SPT may require to share the personal data we collect via CCTV and BWV:

- (i) with the police, the British Transport Police and any other criminal/regulatory investigation bodies/agencies such as the Crown Office and Procurator Fiscal Service, the Office of the Rail Regulator and the Health and Safety Executive, in relation to specific investigations/prosecutions;
- (ii) with SPT's external legal advisors, loss adjusters, insurers and insurance brokers, in relation to any specific investigations/claims of loss, injury or damage on premises where SPT is responsible;
- (iii) with Government agencies able to compel disclosure if we receive an appropriate request;
- (iv) with Courts and employment tribunals in relevant cases and may be shared with external legal advisers in these cases;
- (v) in response to an order from a court/tribunal with competent jurisdiction to make such an order; and
- (vi) in response to investigations by external regulators such as Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

In addition, SPT has contracts for the operation and maintenance of the CCTV systems with third party service providers.

Where required, these arrangements are covered by information sharing agreements.

## Your information rights

Your information rights include:

- Your right of access
- Your right to rectification
- Your right to erasure, in certain circumstances
- Your right to restriction of processing, in certain circumstances
- Your right to object to processing, in certain circumstances
- Your right relating to automated decision making

If you make a request, we have one month to respond to you.

If you wish to exercise any of your information rights, please contact [infogov@spt.co.uk](mailto:infogov@spt.co.uk) or see SPT's Data Protection page (see [www.spt.co.uk/dataprotection](http://www.spt.co.uk/dataprotection)) for more information on how to do this.

## How to contact us

The Data Protection Officer for SPT:

Valerie Davidson  
Assistant Chief Executive  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Telephone: 0141 333 3298

E-mail: [info.gov@spt.co.uk](mailto:info.gov@spt.co.uk)

## Complaints to the Information Commissioner

You can complain to the ICO if you are unhappy with how we have used your data. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Web site: <https://ico.org.uk/>

## Changes to this notice

SPT may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice here. This Notice is effective from March 2021.