

Your Data – SPT and Recorded Telephone Calls

What telephone calls does SPT record?

Telephone calls made to and received from the following departments are recorded:

- (a) The MyBus Contact Centre;
- (b) The Travel Card Unit; and
- (c) Subway Control, Depot Gatehouse, Reception and Administration and Station Ticket Offices.

Why SPT needs the call recordings, what we do with them and who we'll share these with:

- We use the recordings for the following purposes:
 - a) the prevention, detection and investigation of crime;
 - b) in the interests of public safety and security; and
 - c) the management and monitoring of health, safety and security;
 - d) 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;
 - e) 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;
 - f) to enable us to comply with any legal requirements, pursue the legitimate interests of SPT and protect our legal position; and
 - g) Quality control monitoring and the training of SPT personnel.
- SPT managers involved with disciplinary, technical or safety investigations shall, on request, be given access to recordings where it is alleged that the behaviour may constitute misconduct, unlawful activity or behaviour which puts others at risk.
- Recordings will generally be disclosed to the 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, provided that SPT is satisfied that legitimate grounds exist for doing so.
- Information will also be released to government agencies able to compel disclosure if we receive an appropriate request.
- Information will be released to courts and employment tribunals in relevant cases and may be shared with external legal advisers in these cases.
- Information will also be released in response to an order from a court/tribunal with competent jurisdiction to make such an order.
- Information may also be released in response to investigations by external regulators such as Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

What if I am identifiable in the recording?

If you are identifiable in the recording, then it is your personal data under the new data protection law. Please refer back to the intranet dedicated to the new rights that data subjects have under the new data protection law.

Retention of call recordings

SPT will ordinarily retain recordings for a period of 31 days prior to the recording being securely and permanently destroyed. Recordings shall be retained for such a longer period as may be necessary, reasonable and proportionate if that recording has to be used or disclosed as set out above.