



Strathclyde Partnership for Transport

Privacy Notice – CCTV systems

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 the following ‘premises’:

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

SPT uses Body Worn Video (“**BWV**”) in our Subway stations and Bus stations. Any images captured by BWV will be treated in the same manner as CCTV images.

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.

SPT also uses forward facing dash cams in its fleet vehicles.

Except for BWV, SPT CCTV systems do not record sound.

This Privacy Notice explains how SPT uses personal data collected from CCTV, BWV and dash cams.

Personal data we hold

- Static or moving images
- Sound when using BWV

How we obtain your personal data

SPT collects the above personal data via CCTV, BWV and dash cams which capture events in real time on or around our premises, in our trains and when using our fleet vehicles.

The purpose of processing your personal data

CCTV and BWV is used by SPT for the following purposes:

- the prevention, detection and investigation of crime
- public safety and security
- the management and monitoring of health and safety in our capacities as (i) employer, (ii) Subway operator and bus station owner / occupier and manager
- to allow SPT and approved third parties to investigate, process and respond to any reports of loss, injury or damage on premises where SPT is responsible

- to monitor, investigate and improve customer service, identify good practice and to investigate and respond to reports of poor customer service, queries, complaints, refunds, loss, injury or damage on premises where SPT is responsible.
- while not its principal function, CCTV footage may in appropriate circumstances be used in connection with staff discipline to investigate misconduct, unlawful activity or behaviour which puts others at risk to investigate and take appropriate action

Dash cams are used by SPT in fleet vehicles for the following purposes:

- for recording incidents/events while the vehicle is in operation.
- fleet management not driver management.
- the system is not used to monitor staff whereabouts or productivity, or for disciplinary purposes.
- journey details (location and vehicle movement) may be shared with managers on request. For example, if a lone worker driver is not responding and there are safety concerns.
- driver identification will be used to pass on any fines incurred while driving, for example using the bus lane.

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 from CCTV, BWV and dash cams:

- SPT's Public Task

How we store your personal data/keep it secure

SPT is committed to ensuring that your personal data is secure. 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.

Your personal data is securely stored within the UK.

The length of time we keep your personal data

The personal data we collect from CCTV and BWV will be retained for a period of 30 days from the time of the recording, after which it will be permanently deleted unless 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.

The personal data we collect from vehicle dash cams record 30 hours of footage before being overwritten. SPT has portal access to driver tracker data and footage of 'events' for 3 months. Thereafter data is archived for three years and manually deleted by the contractor.

Sharing your personal data

SPT may require to share your personal data that we collect from CCTV, BWV and dash cams as follows:

- (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 or see SPT's Data Protection page (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
Chief Executive
Strathclyde Partnership for Transport
131 St Vincent Street
Glasgow
G2 5JF

Telephone: 0141 333 3298

E-mail: infogov@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 February 2025.