



Privacy Notice – CCTV

Background

This Privacy Notice is designed to explain how and why information about individuals in the following categories is used and managed:

- Images of staff, students and others who are recorded on CCTV

All of the personal information will be treated in accordance with the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This means that confidentiality will be respected and that appropriate security measures will be taken to prevent unauthorised disclosure. This notice is intended to meet the transparency requirement of the legislation and to ensure that all individuals in the categories above know how their data will be processed.

Using your personal information

Who will process my information?

Under Data Protection law the University is the “data controller”. This means that the University is responsible for how it uses and processes your information and complying with requests relating to your personal data.

Why do we collect and use your personal information?

Glasgow Caledonian University (GCU) is committed to protecting the rights and freedoms of individuals, a principle which underpins how the GCU uses closed circuit television (CCTV) ensuring that personal information is used fairly, stored securely and not disclosed unlawfully. The system is operated with due regard for the privacy of the individual and the University’s legal obligations under the General Data Protection Regulation 2018 and the Data Protection Act 2018 (DPA).

Additionally, the use of CCTV is based on the Code of Practice for Surveillance Cameras and Personal Information issued by the Information Commissioner’s Office (ICO).

CCTV is used for the purpose of public safety and security and may be used for investigations and proceedings arising under the University’s regulations, codes and policies.

Keeping information updated

The system operates 24 hours per day, 365 days per year and is continuously digitally recorded with data retained for a period of not more than 31 days following which it will be automatically erased unless there is a recorded and proportionate reason for its longer retention for a specified purpose.

How long is the information kept?

Closed circuit television recordings and other materials reproduced from the CCTV recordings shall normally be retained for a maximum period of 31 days before being automatically erased. Where an incident is recorded that could give rise to further proceedings and the recording may be relied upon, that recording will be retained for a period of 7 years from the date of recording.

Recordings and other material reproduced as part of a criminal, civil or disciplinary case will be retained for a period of 6 months following the disposal of the case.

Where do we obtain information from?

GCU operates a networked CCTV system throughout the Glasgow City Campus including Caledonian Court student residence and London City Campus overtly monitoring both public and restricted areas.

All cameras are centrally controlled and monitored 24/7 at Glasgow City Campus with secondary monitoring within the satellite security office at Caledonian Court and the London City Campus reception.

CCTV images are continuously digitally recorded to University data servers.

What information is being collected and used?

Information consists of CCTV recordings including:

- Images of data subjects including staff, students and visitors to Glasgow City Campus including Caledonian Court student residences and London City Campus
- Personal visual images and information from CCTV including location, actions and behaviours, and associations; no audio is recorded

Who is the information shared with?

Disclosure of images to third parties is controlled and must be consistent with the purpose for which the system was established.

Disclosure of images to third parties will only be provided where permitted by Data Protection or other legislation and is limited to the following:

- Police and other Law Enforcement agencies
- Crown Office and Procurator Fiscal Service (COPFS) or other prosecution agencies
- University Management with a legitimate reason for accessing images, for example Investigating Officers conducting enquiries in relation to alleged contraventions of the University's regulations, codes and policies
- Legal requirement to disclose

Where a request is made by the police or other public body to conduct covert surveillance using the University CCTV system, written authority is required under the Regulation of Investigatory Powers (Scotland) Act 2000.

How is the information kept securely?

Information is kept securely on University digital data servers in line with University information security and data protection policies.

Additionally, access to Security Control Rooms where live images are viewed is restricted to authorised personnel and cannot be viewed externally.

Will the information be used for automated decision-making?

No.

Is the information transferred outside the European Union?

No.

Your rights

You have the right to:

- Find out what personal data we process about you and to request a copy of the data
- Ask us to correct inaccurate or incomplete data
- Withdraw consent to process your personal data, if you were asked for and provided consent

If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data
- Complain to the UK Information Commissioner's Office

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data
- Erase your information or tell us to stop using it to make decisions about you
- Provide you with a portable electronic copy of data you've given us

Please contact us if you wish to exercise/enquire about any of these rights.

Contact Details

Data Protection Officer (DPO)
Department of Governance
Britannia Building
Glasgow Caledonian University
Cowcaddens Road
Glasgow
G4 0BA

Email: dataprotection@gcu.ac.uk

Legal basis for using your information

The legal condition which enables the University to process personal information is found in Article 6 of the General Data Protection Regulation (GDPR). In particular we rely on:

- Article 6(1)(c) compliance with a legal obligation
- Article 6(1)(d) vital interests
- Article 6(1)(e) performance of a task in the public interests/exercise of official authority
- Article 6(1)(f) legitimate interests

Where special categories of data are processed we will have your explicit consent or another legal reason within Article 9(2) of GDPR will apply.

Further information

The Information Commissioner's Office website: <http://www.ico.org.uk>

The University's Data Protection webpages: <https://www.gcu.ac.uk/dataprotection/>

Further information is available in the Student Privacy Notice and Staff Privacy Notice:
<https://www.gcu.ac.uk/dataprotection/>