

Privacy Notice – Closed Circuit Television (and audio recording) (CCTV) on School Transport

Several buses used for home to school transport have CCTV systems with audio installed. The council works with transport providers and schools to ensure that these are operated lawfully and in a way that enables us to reduce anti-social behaviour, criminal activity and the threat of crime on some school transport.

This personal information may include your activities, your face, your voice, car registration details and other visual information about you which is recorded on our CCTV system. There are signs clearly displayed on the buses which have CCTV and audio recording equipment fitted.

The purpose of the CCTV and audio equipment is to, but not limited to:

1. Why do we collect and keep your personal information?

We collect and use your personal information so that we ensure we provide safe and secure home to school transport.

We collect and use your personal information so that we can:

- Reassure parents that the safety of the pupils is paramount
- Create an environment in which the students will feel is safer and in which they will want to travel to and from school
- Protect the health & safety of employees, customers and members of the public
- Comply with child protection obligations, allegations or complaints
- Manage safe behaviour on school transport, safeguarding passengers and drivers
- Manage and investigate allegations, complaints, offences and incidents
- Prevent, deter and detect fraud and crime, antisocial behaviour, criminal damage, public disorder, unlawful behaviour and inappropriate conduct
- Support the police in the reduction of anti-social behaviour and vandalism and assist in the preservation of public order
- Assist with the identification of offenders and aid the school and transport provider in identifying the students, in conjunction with the police and schools
- Facilitate the apprehension and prosecution of offenders
- Assist the police with providing evidence, where criminal and civil prosecutions arise
- Support the bringing of offenders to justice and to increase community safety
- Provide public services and to monitor and improve the Council's performance
- Meet our legal obligations
- Support the establishment, exercise or defence of legal and insurance claims

The Processing of your data is for one or more of the following:

- Because it is necessary for the performance of a contract to do so
- Because we have a legal obligation to do so
- Because it is necessary for the performance of this task to do so
- Necessary for the purposes of legitimate interests to do so

2. How Information about you is used.

The information will be processed according to the General Data Protection Regulation 2016 and the Data Protection Act 2018. Any system will be operated in accordance with the 12 guiding principles set out in the Surveillance Camera Code of Practice 2013, and under the Protection of Freedoms Act 2012, and will be carried out in line with the Information Commissioner's Office CCTV Code of Practice.

We have a duty to protect the public funds we administer and may use the information collected to detect and prevent fraud. We may also cross check the information with other services and departments of Pembrokeshire County Council and our partners where appropriate to do so.

We will also make any disclosures required by law and we may also share this information with other bodies responsible for detecting/preventing fraud/crime or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost effective way. In order to achieve this, information may be shared with other internal departments within Pembrokeshire County Council and with The Auditor General for Wales.

We will only share CCTV footage where we are legally obliged to do so, or where we are allowed to do so under exemptions in the General Data Protection Regulation 2016 and the Data Protection Act 2018 - for example for the prevention or detection of crime. Where this information is shared, we will also retain a copy in the event of a serious or major incident or where it would be appropriate to do so.

We will not make any disclosures to third parties for marketing.

In all cases this will be done where there is a lawful basis under the conditions set out in the Data Protection Legislation. This will be supported by Data Sharing Agreements where this is best practice.

3. How long do we keep hold of your information?

CCTV will only be viewed when necessary (for example, to detect or prevent crime) and footage is stored for a set period of time.

Recording systems allow data to be stored depending upon the size of the data captured and the operating hours of the system. If you would like further information on this please contact dataprotection@pembrokeshire.gov.uk or telephone 01437 774600/01437 776384.

Images captured by CCTV will not be kept for longer than necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated, to investigate a data breach or to comply with legal requirements. This period can vary as it will depend upon the circumstances of the particular case, but for criminal or civil legal proceedings this could mean that the personal information is retained until after the legal case and any appeals have been concluded, which may be many years. It will only be kept for the minimum period required and will be securely disposed of once it is no longer required.

In all cases, your personal information will be securely destroyed once the retention periods described above expire. If you would like more detailed information on our retention periods please contact dataprotection@pembrokeshire.gov.uk or telephone 01437 774600/01437 776384.

4. Access to my personal information?

You can find out if we hold any personal information by making a subject access request under the General Data Protection Regulation 2016 and Data Protection Act 2018. To make a request for any personal information we may hold you need to contact:

Access to Records Team
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP
accesstorecords@pembrokeshire.gov.uk
01437 775798

5. Your Rights.

Under the General Data Protection Regulation 2016 and Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you, not all rights will apply it will depend on the legal basis for processing your data.

- The right to be **Informed** – Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR
- The right of **Access** – you are entitled to request access to and a copy of, information we hold about you
- The right to **Rectification** – you have the right to ask to have your information corrected.
- The right to **Erasure** – this is not an absolute right and will depend on the reason for processing your personal information
- The right to **Data Portability** – This only applies to data processing that is carried out by automated means
- The right to **Restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to **not be subject to automated decision-making and profiling**

6. Complaints or Queries.

Pembrokeshire County Council endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Jo Hendy, Data Protection Officer
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk

Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Email case worker@ico.org.uk Telephone No: 0303 123 1113

7. Changes to this privacy notice.

We keep our privacy notice under regular review. You are encouraged to regularly check for any updated version of this privacy notice.