Privacy Notice for Body Worn Visual (BWV)

Your Personal Data

The University of Glasgow will be what's known as the 'Data Controller' of your personal data processed in relation to Body Worn Visual (BWV) cameras. This privacy notice will explain how the University of Glasgow will process your personal data.

Why we need it

We are collecting your basic personal data such as your static and moving images and audio which is required by the University of Glasgow to deter threatening or anti-social behaviour and protect all students, staff, visitors and contractors on the University campus. BWV will reduce the scope of false allegations against the Campus Security Team, protect team members who are lone working and help to gather evidence of parking contraventions and possible criminal acts or threats to public security.

Legal basis for processing your data

We must have a legal basis for processing all personal data. In this instance, this is legitimate interests. The University has a duty to create a safe environment for staff, students and visitors to the University campus. There is an institutional interest in processing this information for the potential detection and prevention of crime and the protection of all students, staff and visitors.

In addition to the above the following may also apply:

Legal obligation – the University has an obligation to ensure the safety of staff under the Health and Safety at Work etc Act 1974

Contract – the University will rely on this legal basis for processing personal data relating to alleged incidents of misconduct by staff or students. Evidence captured on BVW may be used in internal University investigations into any breaches of the staff or student contract.

What we do with it and who we share it with

The BWV units are worn overtly by our authorised users and are only utilised when required. In other words, they do not continually capture images but authorised users press the record button when the user feels there is a threat to people, property or a criminal act is being committed. The National Police Chief's Council (NPCC) recommends that all cameras should have a minimum of 30 seconds pre-record of audio and video which is recommended to ensure that true reflection of events are recorded. This 30 seconds is only attached to the footage once the record button has been pressed.

As part of the implementation of Terrorism Act 2025 (Protection of Premises) the University is required to have adequate security provisions to mitigate the risk of a terrorist attack on campus. The use of BWV will enable the University to record any suspicious incidents, action these and report to the police, where applicable..

All images and audio recorded on BWV's are processed by authorised users at the University of Glasgow and will be shared with the provider (HALOs body cameras) and the following 3rd parties who they are affiliated with:

Amazon Web Services

Affiliates of HALO (for purposes of implementation, support and maintenance of the Services)

Google Analytics

Hot Jar

All servers are located within the UK and EEA.

The University will also store BWV data retained as part of any incident on the secure server Access will be locked down to authorised individuals.

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

Your data may be shared in the following ways:

- Internally with Senior Management, Student Conduct or People & Organisational Development teams where data has been captured by BWV showing evidence of misconduct or an alleged contravention of the University's regulations, policies and codes of practice
- With the Police and other Law Enforcement agencies if there is evidence of criminal behaviour/activity or a legal requirement to disclose

How long do we keep it for

Your data will be retained by the University for 30 days and automatically deleted. If footage has been archived as part of an incident logged or internal investigation, it will be retained for 2 years from the date of incident/log.

What are your rights?*

You can request access to the information we process about you at any time. If at any point you believe that the information we process relating to you is incorrect, you can request to see this information and may in some instances request to have it restricted, corrected or erased. You may also have the right to object to the processing of data and the right to data portability. Where we have relied upon your consent to process your data, you also have the right to withdraw your consent at any time.

If you wish to exercise any of these rights, please submit your request via the <u>webform</u> or contact <u>dp@gla.ac.uk</u>.

*Please note that the ability to exercise these rights will vary and depend on the legal basis on which the processing is being carried out.

Complaints

If you wish to raise a complaint on how we have handled your personal data, you can contact the University Data Protection Officer who will investigate the matter. Our Data Protection Officer can be contacted at dataprotectionofficer@glasgow.ac.uk

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO) https://ico.org.uk/