

## Anti-Social Behaviour Monitoring Agreement Privacy Notice

### Anti-Social Behaviour Monitoring Broadway Agreement Privacy Notice

*The New Collaborative Learning Trust vision is to create a culture of protecting privacy and personal data. Personal data is information which 'relates to and identifies a living individual'. Personal data should be adequate, relevant and limited to what is necessary.*

#### DATA CONTROLLER AND PROCESSING

The Broadway Shopping Centre (operated by Munroe K Asset Management Limited as data controller) operates CCTV at its premises, and where persistent anti-social behaviour from individuals who may be students at New College Bradford is identified, the Broadway Shopping Centre may share still images of those individuals with New College Bradford. You can view their privacy notice at ['Privacy & Cookie Policy – The Broadway Bradford'](#). Once these images have been shared with New College Bradford, NCLT becomes the receiving data controller of this information and is responsible for processing personal data lawfully, according to the Data protection Act 2018 and the General data Protection Regulation.

#### WHY DO WE COLLECT AND USE THIS INFORMATION?

We process this information based on a data sharing agreement with Broadway to help tackle low level disturbances and anti-social behaviour in the local community. Our identified legal basis for processing is:

- **GDPR Article 6(1)f** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The legitimate interests and purposes of processing in this case are to help tackle low level disturbances and anti-social behaviour in the local community'

#### CATEGORIES OF INFORMATION

As part of our agreement with Broadway Shopping Centre, the information that we collect, hold and share includes:

- CCTV images where individuals can be identified

#### STORING PERSONAL DATA

If the New College Bradford confirms that the Data Subject is not an enrolled student, then the image/s will be deleted within one month. If the New College Bradford is able to confirm that the Data Subject is an enrolled student, then the image will be retained whilst communication takes place with the student and their parent/carer, and for no longer than three months.

#### WHO DO WE SHARE INFORMATION WITH?

If a student is identified as a New College Bradford student, this will be confirmed with the Broadway Shopping Centre, however individual student information will not be shared, unless a banning order is required. In the event of a banning order being issued, information sharing required to enforce the banning order will be kept to a minimum. In the event of anti-social or criminal behaviour, we will share personal information with West Yorkshire Police.

#### REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation students have the right to request access to information about them that we hold. To make a request for this, please email the New Collaborative Trust's Data Protection Officer [data.protection@nclt.ac.uk](mailto:data.protection@nclt.ac.uk). In most cases you also have the right to:

- In certain circumstances, object to processing of personal data
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. You can also raise a complaint directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

#### DATA PROTECTION OFFICER

If you would like to discuss, or require clarification regarding this privacy notice, please contact the NCLT Data Protection Officer. Enquiries can be forwarded to [data.protection@nclt.ac.uk](mailto:data.protection@nclt.ac.uk) or by calling 01977 702139.