



TRANSPORT
SCOTLAND
CÒMHDHAIL ALBA

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LitterCam AI Trial Data Privacy Notice

LitterCam AI – Data Privacy Notice

This privacy notice explains how Transport Scotland will collect, use, store, share and protect personal data as part of a time-limited trial of LitterCam AI technology.

Transport Scotland is undertaking a research trial using AI-enabled roadside cameras to understand the prevalence and patterns of littering from vehicles on parts of the trunk road and motorway network. The trial will run from 14 September 2026 to 31 March 2027 on Motorways and Special Roads within the Trunk Road South East Unit.

This is not an enforcement scheme. The trial is a data-gathering exercise to build an evidence base and all findings will be used in aggregated and anonymised form only.

Why we are doing this

Transport Scotland is responsible for the management, operation and maintenance of Scotland's trunk road and motorway network. As part of this role, it has statutory duties to reduce environmental harm and maintain network safety.

Littering from vehicles has negative environmental, safety and financial impacts. However, there is currently limited, reliable evidence on how often it occurs, where it is most prevalent, and how it varies over time.

The aims of the LitterCam AI trial are to:

- Understand how frequently littering from vehicles occurs
- Identify where and when littering is most likely to take place
- Test whether AI-enabled camera technology can provide proportionate and reliable evidence
- Support future decisions on environmental management, operational responses and policy development

Processing is carried out under Article 6(1)(e) UK GDPR (task carried out in the public interest / exercise of official authority). This work supports Scottish Minister's duties under section 89 of the Environmental Protection Act 1990 and the Code of Practice on Litter and Refuse (Scotland) 2018.

What data we collect

LitterCam AI uses fixed roadside CCTV cameras with built-in artificial intelligence software. The technology is designed to detect potential littering events from moving vehicles.

How the system works

- Cameras analyse imagery in real time.
- Images are not kept as standard.
- If the system detects what appears to be litter being thrown from a vehicle, it automatically retains a short clip consisting of 15 seconds before and 15 seconds after the detected event.
- All other imagery is automatically and immediately deleted.

Types of data involved

The trial may involve limited personal data, including:

- Images of the rear of vehicles involved in suspected littering events
- Vehicle Registration Marks (VRMs) that may be captured incidentally as part of the detection process
- The date, time and general location of the event

The cameras are intentionally set up to capture rear-facing views only. They are not designed to capture images of drivers, passengers or the interior of vehicles, and no biometric data is processed.

The trial does not involve special category data under Article 9 of the UK GDPR. Littering from a vehicle does not currently constitute a fixed-penalty or criminal offence in Scotland.

How we use the data

Where footage is retained following an AI detection:

- It is securely transferred to a UK-hosted cloud environment
- It is reviewed by authorised staff to confirm whether littering has occurred
- It is used solely to produce anonymous statistical information about littering patterns and prevalence

All detections are subject to human review and no decisions are made based solely on automated processing. The trial is not used to identify individuals or vehicles, and no enforcement or regulatory action will be taken..

Looking after your data

Access and handling

- Access to any retained footage is limited to authorised personnel acting on behalf of Transport Scotland
- Staff handling the data are appropriately trained
- System access is logged and auditable
- LitterCam Limited does not routinely access footage unless explicitly authorised

Security

- Data is stored in a UK-based cloud environment that is certified to ISO 27001 information-security standards
- Data is encrypted at rest and in transit
- No footage is stored on the cameras themselves

Retention

- Footage is kept only for as long as necessary to complete analysis during the trial
- All retained imagery will be securely deleted no later than 7 days of the end of the trial

These measures are in place to comply with the UK GDPR principles of data minimisation, security and storage limitation.

Your data protection rights

Data is collected automatically in public places, so individuals have limited ability to control capture at the point it occurs. However, individuals still have rights under the UK GDPR, including the right to:

- Request access to personal data
- Request erasure or restriction of processing

- Object to processing in certain circumstances

Where possible, requests will be considered in line with data protection law, although it may not always be possible to identify specific individuals from the data collected.

Some rights may be limited where data is processed for statistical and research purposes, but appropriate safeguards — such as short retention periods and anonymisation — are applied in line with Article 89 of the UK GDPR.

Contact us

If you have any questions about this privacy notice or the LitterCam AI trial, please contact:

Transport Scotland – Data Protection Team

Email: dpa@transport.gov.scot

You also have the right to raise concerns with the Information Commissioner's Office (ICO) if you consider that your personal data has been processed unlawfully.



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