

Your Data – SPT and the National Entitlement Card Scheme

The Background

- The National Entitlement Card Scheme (“the NEC Scheme”) is administered by Scottish Local Authorities primarily to allow efficient and customer-friendly access to various Scottish public sector services, both by providing a multi-purpose smartcard and by giving individuals the opportunity to demonstrate who they are;
- Dundee City Council is the managing authority for the NEC Scheme, and performs this function through the National Entitlement Card Programme Office (“NECPO”);
- There is a draft Information Sharing Agreement between the Council and NECPO, and that Agreement sets out that the 32 local authorities in Scotland have lead responsibility for the personal data belonging to individuals whose most recent addresses are situated within their respective Council Areas;
- As the regional transport partnership for the West of Scotland SPT is the agent/administrator for the purposes of the NEC Scheme for the following Councils:
 - Glasgow City
 - Renfrewshire
 - East Renfrewshire
 - North Ayrshire
 - East Ayrshire
 - West Dunbartonshire
 - South Lanarkshire
 - North Lanarkshire
 - East Dunbartonshire
 - South Ayrshire
 - Inverclyde

This means that SPT administers the NEC Scheme across the Strathclyde Area, and processes the personal data and special category personal data (such as information relating to medical conditions and disability) of individual Data Subjects on behalf of, and in accordance with the instructions of the Council and NECPO, in order to facilitate the issue of National Entitlement Cards and the smooth administration of the NEC Scheme, and in order to allow SPT to administer the Strathclyde Concessionary Travel Scheme in relation to Ferry Cards.

The information that the Councils, NECPO and SPT use and share in order to allow SPT to administer the Scheme in the Strathclyde Area

SPT has access to the following the information as the administrator of the NEC Scheme in Strathclyde:

Data category
Person Data (Title, Name, Gender, Date of Birth, Photo, Death Indication and Date, UCRN-Unique Citizen Reference Number ¹)

¹ UCRN is expected to be removed from NEC Scheme processing during 2018

Data category
Information about a person's medical condition(s), i.e. relating to a disability
Address Data (Address, Postcode, Local Authority, UPRN-Unique Property Reference Number; Delivery Address, Delivery Postcode)
Person and Residence Proof Data (Indicator that proofs seen, Type of proofs seen, Photo referee details)
Contact Details Data (Phone Numbers, Email Address)
NEC Scheme Card Data (Applicant ID, Card number (NEC), Type of Card ‡, Card Expiry Date)
General Travel Scheme Card Data (Card Number (ITSO))
National Concessionary Travel Schemes Card Data (Type of Card ‡, Product Expiry Date) – only where required
Card Hotlist Data (Hotlist reason, Hotlist Date) – only as required
Entitlement Proof Data (Indicator that proofs seen, Type of proofs seen ‡) – only where required
Assent Data (Agreement to processing required for card, Consent to additional data sharing)
School Data (Establishment details) – only where delivery to alternative address required
Notes History Data (Freeform notes on a customer record)
Audit Trail Data (All data entered into the Card Management System listed above, i.e. non-paper data) ‡
System Transaction History Data (A summary of each administrative transaction, e.g. form received, card issued, card recorded as lost/stolen etc.)
Scans and physical copies of paper forms held centrally ‡
Scans and physical copies of paper forms held locally ‡

‡ - Will sometimes include personal data from a special category, e.g. health information

This will be the minimum amount of data needed to properly allow the NEC Scheme to operate and eligibility for a Card to be determined.

- SPT is using the personal information you have provided to it and to the National Entitlement Card Scheme Programme Office about your entitlement to concessionary travel, in our capacity as administrators of the NEC Scheme in Strathclyde for the twelve Councils set out above, and we are undertaking this task, and using and accessing your personal information, in the public interest.
- We also use the information contained in the National Entitlement Card Scheme Case Management System about the reason why you are entitled to a National Entitlement Card in order to confirm that you qualify for the the Strathclyde Concessionary Travel Ferry Card and to allow us to issue you with a Strathclyde Concessionary Travel Ferry Card. Eligible disabled applicants are automatically issued with ferry travel cards by SPT when their National Entitlement Card applications are processed. Again, this is a task in the public interest, and SPT's basis for administering the Strathclyde Concessionary Travel Scheme and issuing the Ferry Cards has its foundation in the Transport Act 1985.
- As and when any changes are made to the information SPT receives, processes, shares or accesses in connection with the NEC Scheme, this notice will be updated.
- The personal information we hold and process will be used in the interests of effective and efficient concessionary transport.
- We will keep and use it proportionately and reasonably to enable us to manage our relationship with the Councils, NECPO and the end service users effectively, lawfully and appropriately. This includes using any information to enable SPT to comply with any legal requirements, pursue the legitimate interests of SPT and protect our legal position. As the data processors for the Councils and NECPO, we need to comply with their lawful instructions in relation to using/holding/sharing personal data.

Your rights and how to exercise those rights.

We have a special part of our website dedicated to the new rights that data subjects have under the GDPR. You can [find that here](#).