



## Strathclyde Partnership for Transport

### Privacy Notice - School Transport

#### Who we are/the service

Strathclyde Partnership for Transport (“**SPT**”) is, in terms of the Transport (Scotland) Act 2005, the Regional Transport Partnership (“**RTP**”) for the west of Scotland, covering 12 local council areas and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

SPT acts as agent in respect of the procurement and management of contracts for the provision of school transport between 11 of the local council areas and Transport Operators (“**School Transport**”).

This Privacy Notice explains how SPT collects and uses pupil personal data in relation to School Transport contracts.

#### Personal data we hold

- Pupil’s name, address and date of birth
- Contact details of applicant for the pupil’s transport
- School name
- Pupil’s School Attendance End Date
- Any other data you provide us with in order for us to provide this service to you

Specifically, the special category personal data we hold relates to your health (where relevant to School Transport).

#### How we obtain your personal data

We received the above data from your local Council in connection with your School Transport application. We also receive information provided by parents/ carers/ responsible adults.

#### The purpose of processing your personal data

This data enables SPT to

- manage and administer effective and efficient school transport services
- manage school contracts and our relationship with the Councils, the Transport Operators and the pupils

#### The legal basis for using your personal data

We process your personal data lawfully and fairly in accordance with data protection legislation. Special category data and data related to criminal offences is processed as part of our statutory functions.

Specifically, the following legal bases apply to the processing of the personal and the special category personal data we have received:

- Contract
- SPT’s Public Task
- Legal obligation
- Vital interests
- Substantial public interest

## How we store your personal data/ keep it secure

SPT is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we collect from you.

## The length of time we keep your personal data

SPT will retain your data for as long as it is necessary, reasonable and proportionate to do so in order to provide you with this service, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT. Once a child reaches school-leaving age and is no longer entitled to receive school transport, anonymised data may be retained for analysis and statistical purposes.

## Sharing your personal data

SPT will require to share pupil data as detailed below with the relevant Transport Operator in order that the Transport Operator can deliver the School Transport.

- School name
- Pupil's name and address
- Confirmation that pupil is aged 16 or over, if applicable

If necessary, SPT may require to share the following special category data with the Transport Operator:

- health (medical information that is relevant to the pupil's transport)

SPT may also require to share pupil data as follows:

- (i) with the relevant local Council and/or school in relation to specific accidents, incidents, complaints, and/or investigations in such cases;
- (i) with the police and other criminal/regulatory investigation agencies, which may include the Health and Safety Executive and the NHS, in relation to specific investigations;
- (ii) with courts and employment tribunals in relevant cases and may be shared with external legal advisers in these cases;
- (iii) in response to an order from a court/tribunal with competent jurisdiction to make such an order; and
- (iv) in response to investigations by external regulators such as SPT's auditors, Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

## Your information rights

Your information rights include:

- Your right of access;
- Your right to rectification;
- Your right to erasure, in certain circumstances;
- Your right to restriction of processing, in certain circumstances;
- Your right to data portability, in certain circumstances;
- Your right to object to processing, in certain circumstances; and
- Your right relating to automated decision making.

If you make a request, we have one month to respond to you.

If you wish to exercise any of your information rights, please contact [infogov@spt.co.uk](mailto:infogov@spt.co.uk) or see SPT's Data Protection page (see [www.spt.co.uk/dataprotection](http://www.spt.co.uk/dataprotection)) for more information on how to do this.

### How to contact us

The Data Protection Officer for SPT:

Valerie Davidson  
Assistant Chief Executive  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Telephone: 0141 333 3298

E-mail: [info.gov@spt.co.uk](mailto:info.gov@spt.co.uk)

### Complaints to the Information Commissioner

You can complain to the ICO if you are unhappy with how we have used your data. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Web site: <https://ico.org.uk/>

### Changes to this notice

SPT may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice here. This Notice is effective from April 2021.