

# Headington & MCS Bus Partnership

## DATA PROTECTION AND PRIVACY POLICY

### 1. INTRODUCTION

Headington and MCS Bus Partnership Ltd (HMBus) is fully committed to compliance with the requirements of the General Data Protection Regulation (GDPR).

HMBus complies with best practice principles when collecting, processing, storing and disclosing any personal data, including that data will:

- be processed fairly and lawfully;
- only be collected and used for specified purposes;
- be adequate, relevant and not excessive;
- be accurate and up to date;
- not be held any longer than necessary;
- respect a subject's rights;
- be kept safe from unauthorised access, accidental loss or damage; and
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

and that individuals have rights:

- to be informed;
- of access;
- to rectification;
- to erasure;
- to restrict processing;
- to data portability;
- to object; and
- in relation to automated decision making and profiling.

HMBus is the Data Controller with regard to personal data collected by the company about pupils and their parents and/or guardians, and is registered with the Information Commissioner's Office (ICO). The Headington and MCS Bus Partnership ICO registration reference is ZB552819 and its registered address is Magdalen College School, Cowley Place, Oxford, OX4 1DZ.

HMBus has appointed Richard Couzens as Data Protection Officer ([bursar@headington.org](mailto:bursar@headington.org)) who will endeavour to ensure that all personal data is processed in compliance with HMBus' policy and the Act.

### 2. PERSONAL DATA PROCESSED BY HMBUS

"Personal data" processed by HMBus includes, but is not limited to:

- **Facts about a pupil/parent/guardian including:**
  - pupil's name
  - pupil's age (Year Group)
  - school attended
  - parent/guardian's name
  - parent/guardian's address
  - parent/guardian's contact phone number

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- parent/guardian's email address
- payment details
- **Bus route of interest:**
  - bus stop for pick-up/ drop off
  - days/time of travel
- **Comments/views expressed about the services or additional information provided about a child's travel requirements**
- **Images of a pupil, namely:**
  - images captured by the operator's on-board CCTV system (only to be used in accordance with the GDPR, HMBus' Data Protection policies for third parties and the operator's own data protection policy)

The laws governing how HMBus, and the HMBus schools and suppliers, can use personal data apply whether the personal data is stored electronically or as hard copy.

Buses on which pupils will be travelling will be fitted with vehicle tracking so that parents/ guardians and schools can see whether HMBus vehicles are running to timetable.

### 3. HOW HMBus USES PERSONAL DATA

HMBus contracts with third-party service providers and suppliers including:

- Oxford Bus Company to take bookings, manage booking information, process online payment transactions and provide operational support;
- coach operators, to deliver services; and
- a text and email group messaging provider to enable HMBus to communicate effectively with parents.

Suppliers and service providers are required to keep confidential the information received on behalf of HMBus and may not use it for any purpose other than to carry out the services they are performing for HMBus. Suppliers agree to strict contractual terms in order to keep data secure.

These service providers may change or HMBus may contract with additional service providers.

HMBus and their suppliers will not share personal information with any other third parties without an individual's permission, unless required by law enforcement action, subpoena, or local law.

Personal data will be processed by HMBus strictly in accordance with the GDPR. Specifically, personal data will be used by HMBus to manage the HMBus bus network; plan a pupil's journey on the service to and from school; communicate with parents/ guardians; and to update parents/guardians using the service. Occasionally, HMBus may also use personal data to contact parents/guardians for market research purposes in order to develop and improve the HMBus network of bus services.

Selective and necessary personal data will be shared with the operators providing the service on which a pupil will travel/ potentially travel, solely for the purpose of providing and managing the school transport services and arranging safe carriage of pupils to/from school.

Personal details of pupils travelling will be shared with a pupil's respective school to enable, for example, management and planning of the HMBus network. HMBus Schools have their own Data

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Protection policies, and these also apply to their respective pupils, parents/guardians using HMBus services.

Headington Rye Oxford and MCS may at times pass details of prospective or existing parents/guardians to HMBus, where an interest has been expressed in use of the service or where questions have been raised about travel to school. The Data Protection policy of the respective Member School will apply when the school (as Data Controller at the point of processing that information) passes the details to HMBus.

## 4. KEEPING PERSONAL DATA SECURE

HMBus is committed to protecting any personal data that is provided. To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, HMBus has in place appropriate physical and managerial procedures with Suppliers to safeguard the information collected. Once a parent/ guardian chooses to provide HMBus with personal information, parents/guardians can be assured it will be used only to plan and manage the HMBus bus network, and a pupil's travel on it. HMBus will not sell, rent or lease personal information to others. Personal data will be retained by HMBus only for the period during which a pupil wishes to use the HMBus bus service.

Personal data will be kept on a password-protected computer system. Where personal data is held in hard copy by HMBus or 3<sup>rd</sup> parties (for example, driver's passenger lists), HMBus and third parties (the operator) will ensure compliance to securely dispose of information.

## 5. HMBus BOOKING AND INFORMATION PORTAL

HMBus has contracted Oxford Bus Company to provide booking and operational support, with booking information collected through a secure area on Oxford Bus Company's website. The following information relates to the information that will be collected when you use the portal.

### 5.1 Collection of information

Oxford Bus Company will only collect the information they are required by HMBus to collect, and will process data in accordance with the Data Protection Law, the HMBus Data Protection Statement and the strict Data Processing Agreement that is in place between HMBus and Oxford Bus Company.

### 5.2 Cookies on the Booking Portal (Oxford Bus Company website)

A cookie is a small piece of information that is sent to an individual's browser when they access a website. Cookies contain information about your visits to that website. The purpose of cookies is to enable websites to remember you, and your browsing patterns, when you visit again in the future. With most Internet browsers you can configure your browser so that it refuses new cookies, prompts you to accept cookies or disables cookies altogether. Exactly how this is done is dependent on the browser you use. Further details on the Cookies used by Oxford Bus Company can be found in their Cookie Policy, located at: [oxfordbus.co.uk/cookie-policy](http://oxfordbus.co.uk/cookie-policy)

OBC use Stripe to process payment and no financial information is held by Oxford Bus Company, or its website. All financial information provided is encrypted using SSL (Secure Sockets Layer) technology so that no one else can access your card details as they travel through the Internet. SSL is certified by Verisign and is recognised as a secure way to pay on-line.

Oxford Bus Company gathers general information about users, for example, what services users access the most and which areas of the site are most frequently visited. Such data is used in the

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aggregate to help understand how the HMBus booking portal is used in order to improve services for users. Statistics are anonymised.

## 5.3 Hyperlinks

Oxford Bus Company may provide hyperlinks from their Site to websites of third parties. No liability is accepted for the contents of any site operated by a third party which may be accessed via links from the Site.

## 6. PRIVACY NOTICE - STATEMENT

When an individual gives HMBus any personal data, HMBus will make sure the individual knows:

- who is responsible for the processing of their personal data;
- for what purposes HMBus will process the personal data provided;
- sufficient details about sharing personal data with third parties;
- the rights that the individual has in respect of their personal data;
- any other information that the individual should receive to ensure the processing carried out is within his/her reasonable expectations; and
- who to contact to discuss or raise any personal data issue.

HMBus will do this by providing a Privacy Notice at the time of booking and available on the HMBus Booking Portal. HMBus will also inform individuals about the processing of their personal data at the time that a formal application is submitted to use the HMBus service.

HMBus will also ensure that individuals know how to request access to information held by HMBus and how to request that information is removed i.e. by contacting: [bursar@headington.org](mailto:bursar@headington.org)

## 7. PRIVACY NOTICE:

HMBus is committed to protecting all personal data, including CCTV images, photographs and data provided by parents/ carers:

- Personal data will be used by HMBus schools to: manage the HMBus bus network; plan a pupil's journey on the service; manage billing and payment; communicate with parents; and to manage emergency situations. Occasionally, HMBus may also use personal data to contact parents for research purposes in order to develop and improve the HMBus network and ensure HMBus' service quality standards are being met.
- Personal data (including pupil name and school attended, parent name, location of bus stops to be used, parent contact details) will be shared with operators providing the service. Address details will not be shared with operators.
- Where personal data is held in hard copy by HMBus or operators e.g. driver's passenger lists, HMBus and the operator will ensure compliance to securely dispose of information.
- Personal data will be retained by HMBus only for the Academic Year during which a pupil wishes to use the HMBus service.
- Personal data will be processed by HMBus strictly in accordance with the Data Protection Act.
- Buses may be fitted with CCTV to monitor behaviour and ensure passengers are safe.

*Last Reviewed: 31<sup>st</sup> May 2024*