



DATA PROTECTION - PRIVACY NOTICE FOR THE FOUNDATION SCHOOLS' COACH SERVICE

This Privacy Notice explains how Dulwich College Enterprises Limited (“DCEL”) uses (or “processes”) the personal information (or personal data) of the pupils or prospective pupils at the schools using the Foundation Schools’ Coach Service (i.e. Dulwich College, Alleyn’s School, James Allen’s Girls’ School and Dulwich Prep London) and their parents/guardians.

DCEL (company number 3039344) is a subsidiary of Dulwich College. Its registered office address is Dulwich College, Dulwich Common, London, SE21 7LD.

1. What personal data do we gather?

The personal data that we handle includes:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- dates of birth, schools attended and school years of pupils;
- details of pupils’ journeys, routes and number of journeys a week;
- debit / credit card or other payment or bank details.

In addition, we may also collect the following special category personal data:

- medical conditions and allergies of pupils;
- information about any disabilities that may affect a pupil’s ability to travel by coach;
- images of pupils and staff captured by CCTV systems installed by coach operators used by the Foundation Schools’ Coach Service.

Dulwich College uses CCTV for safety and security reasons. If you have any queries in relation to the use of CCTV on the coaches please let us know.

2. How do we acquire your personal data?

We generally acquire personal data directly from a pupil’s parent(s) or guardian but we may also acquire data from the pupil’s school.

3. What do we do with Personal data collected from you?

We use your personal data for the purposes of performing our contractual and safeguarding obligations to you, including:

- providing a coach service on particular routes to and from school for the benefit of pupils;
- ensuring the safety, comfort and welfare of pupils travelling on coaches;
- responding to any queries, comments or complaints from pupils or parents /guardians;
- collecting payments due from you.

We also have a legitimate interest in processing your data for the following purposes:

- to enable third parties to carry out technical, logistical or other functions on our behalf;
- to prevent or detect fraud or other crime;
- to aid in the identification and prosecution of offenders;
- to safeguard adults and children at risk; and
- to prevent or detect abuses of our website and IT systems.

4. Information sharing

We do not pass on your personal data to third parties for their own commercial use. We do, however, need to share information with others as described below.

- **Dulwich College**

We receive administrative support in a number of areas from Dulwich College (including financial, HR, accounting and legal). Your personal data may be shared with Dulwich College in those contexts.

- **Other Schools**

We receive reimbursement for our services from other schools where pupils have been invoiced direct (Alleyn's School and James Allen's Girls' school). Your personal data may be shared with other schools in this context.

- **All Schools using the Foundation Coach Service**

We need to inform the schools of the names of their pupils who use the Coach Service and which coach each pupil travels on, so that (for example) when we inform them that a coach is delayed in traffic, they know the pupils who will be late for school.

We also need to share information with the schools about pupil misconduct, safeguarding concerns that may arise and parent queries and complaints.

- **Coach Supervisors**

Coach supervisors travelling on the coaches with pupils are in possession of personal data for operational reasons. On occasion supervisors are not employed by DCEL or Dulwich College but are contracted from an agency. Your personal data may be shared with agencies and contracted supervisors for this purpose.

- **Coach Operators**

Personal data is not shared with coach operators or drivers. Data may however be created by coach operators by use of CCTV systems installed on coaches. The CCTV footage may need to be viewed by DCEL and the coach operator in connection with an investigation.

- **IT systems**

A number of the College's IT systems are provided by third parties who are based or use servers outside the European Economic Area (e.g. providers of hosted databases, websites, communication and management information systems). We take steps to put in place suitable safeguards to protect your personal information when processed by such suppliers.

- **Compliance etc**

We also release personal data when we believe release is appropriate to comply with the law; enforce or operate our contracts; or protect the rights, property or safety of DCEL or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, sharing or otherwise disclosing personally identifiable information from pupils, parents or guardians for commercial purposes in a way that is contrary to the commitments made in this Privacy Notice.

5. How secure is Information about me?

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data.

6. How long do we keep personal data?

We retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Our current retention period is 6 years.

7. Your rights

Individuals have various rights under Data Protection Law, including the right to access their personal data (a “subject access request”) and in some cases to ask for their personal data to be erased or amended or for DCEL to stop processing it (subject to certain exemptions and limitations).

Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation should put their request in writing to: The Transport Manager, Foundation Schools’ Coach Service, Dulwich College Enterprises Ltd, Dulwich College, Dulwich Common, London SE21 7LD. Email: okynelg@dulwich.org.uk.

DCEL will endeavour to respond to a subject access request as soon as is reasonably practicable and in any event within statutory time-limits. DCEL will be better able to respond quickly to smaller, targeted requests for information. Please note that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

8. Data accuracy

DCEL will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify the Transport Manager of any significant changes to important information, such as your contact details (Email: okynelg@dulwich.org.uk).

9. Security

DCEL will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to our systems. Our staff are aware of this policy and their duties under Data Protection Law and receive relevant training.

10. Queries or complaints

If you have any query about this Privacy Notice or believe that DCEL has breached the data protection legislation, please notify the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Telephone: 0208 299 9306. Email: legal@dulwich.org.uk

You also have the right to take any complaints about how we process your personal data to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation first, before involving the ICO.

Policy Owner: Clerk to the Governors
Last Reviewed: January 2023
Date of Next Review: January 2025