

# KT's Coaches of Kendal Privacy Policy for Dallam School Home-to-School Transport

This privacy policy explains how KT's Coaches of Kendal collects, uses, stores and shares personal data in connection with home-to-school transport services provided for pupils attending Dallam School. It is intended for parents, carers, pupils and others whose information we process as part of administering and delivering transport services. We are committed to handling personal data lawfully, fairly, transparently and securely in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 1. Who we are

KT's Coaches of Kendal is the organisation responsible for processing personal data for the purposes described in this privacy policy in relation to the transport services it provides for Dallam School routes. For most of the processing covered by this notice, KT's Coaches of Kendal will act as the data controller, meaning we decide how and why personal data is used. In some situations, we may process information on the documented instructions of Dallam School or the relevant local authority, in which case they may also act as a controller or joint controller depending on the circumstances. For privacy queries, please contact: Mr Geordie Herd, Contracts Manager, KT's Coaches of Kendal, Waters Edge Business Park, Crooklands, LA7 7NN. Telephone 01539 567196, email [ktscoaches@hotmail.co.uk](mailto:ktscoaches@hotmail.co.uk).

## 2. The personal data we collect

Depending on the service provided, we may collect and use personal data such as: pupil name; home address; school attended; route and pick-up/drop-off details; year group; parent or carer names; telephone numbers and email addresses; payment and billing information for privately arranged transport; records of bookings, attendance or travel passes; communications about route changes, absence or service issues; and, where necessary, information relevant to a pupil's safety or accessibility needs. We will only collect special category or health-related information where this is necessary to provide transport safely and appropriately, for example where a medical condition, disability or accessibility requirement affects travel arrangements.

### 3. How we collect personal data

We usually obtain personal data directly from parents, carers or pupils when transport is requested, booked or paid for. We may also receive information from Dallam School where this is necessary to organise transport, communicate with families, manage safeguarding concerns, or administer routes. In some cases, information may also be provided by the relevant local authority, for example where transport arrangements interact with statutory school transport functions or where the authority is involved in eligibility, safeguarding or transport planning.

### 4. Why we use personal data and our lawful bases

We use personal data to organise and operate home-to-school transport services, allocate pupils to routes, issue travel information, communicate with parents and carers, manage changes or disruptions, process payments, respond to incidents or complaints, support safeguarding, and meet legal or regulatory obligations. Our lawful basis under UK GDPR will usually be one or more of the following: performance of a contract, where transport is privately arranged and paid for; compliance with a legal obligation, where we are required to process information by law; and legitimate interests, where processing is necessary to run safe and efficient transport services and those interests are not overridden by the rights of the individuals concerned. Where special category data is processed, we will only do so where an appropriate additional condition under data protection law applies, such as where processing is necessary for reasons of substantial public interest, safeguarding, or to protect the vital interests of a child or another person.

### 5. Who we share personal data with

We may share relevant personal data with Dallam School, the relevant local authority, drivers and operational staff, payment processors, IT or software providers, insurers, professional advisers, and regulators where this is necessary for the purposes set out above. We may also disclose information where required to do so by law, to protect the safety or vital interests of a child or another person, to investigate incidents, or in connection with safeguarding concerns, complaints or legal claims. We only share the minimum information necessary and expect recipients to protect it appropriately.

### 6. How long we keep personal data

We keep personal data only for as long as it is necessary for the purposes for which it was collected, including to provide the transport service, maintain business and accounting records, deal with complaints or incidents, and meet legal, safeguarding

and insurance requirements. Retention periods may vary depending on the type of information. Payment and accounting records may need to be kept for statutory periods, while operational transport records should be retained in line with our retention schedule and then securely deleted or anonymised. This period is the period of time you make use of our service.

## 7. Keeping personal data secure

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, alteration or disclosure. These measures may include secure systems, access controls, staff training, confidentiality requirements, secure disposal arrangements and procedures for responding to data breaches. Personal data is only accessible to those who need it for legitimate business, safeguarding or legal reasons.

## 8. Children's data and safeguarding

Because this service involves school-age children, we recognise that children's personal data requires particular care. We aim to use clear and accessible language for families and, where appropriate, for pupils. We only collect information about children that is relevant and necessary to provide transport safely and effectively. Where safeguarding concerns arise, information may be shared with Dallam School, local authorities, the police or other appropriate agencies where this is necessary to protect a child or comply with our legal responsibilities.

## 9. CCTV and vehicle monitoring

If CCTV or other vehicle monitoring systems are used on any vehicles serving Dallam School routes, they will be used for safety, safeguarding, incident investigation, service protection and security purposes. Any such use must be proportionate and supported by appropriate signage, access controls and retention arrangements.

## 10. Your data protection rights

Under data protection law, individuals have rights in relation to their personal data, subject to certain exemptions. These may include the right to be informed, the right of access, the right to rectification, the right to erasure in some circumstances, the right to restrict processing, the right to object, and the right to data portability where applicable. Where personal data relates to a child, a parent or carer may sometimes exercise rights on the child's behalf, depending on the circumstances and the child's level of

understanding. Requests should be sent to the contact details listed in this privacy policy.

## 11. Complaints and further information

If you have questions or concerns about how personal data is handled, please contact KT's Coaches of Kendal using the details above in the first instance. You also have the right to make a complaint to the Information Commissioner's Office if you believe your data has been handled unlawfully or unfairly.

## 12. Changes to this privacy policy

We may update this privacy policy from time to time to reflect changes in our services, legal requirements or how we process personal data. The most current version should be made available to parents and carers and, where appropriate, published with transport information. Last reviewed: 01 May 2026. Next review due: 01 May 2027.