

Data Protection Policy

Company	URBAN TRANSIT SOLUTIONS LTD
Policy owner	Data Protection Lead
Version	1.0
Effective date	06.06.2026
Review date	06.06.2027
Approved by	Director

Purpose

This policy explains how Urban Transit Solutions Ltd handles personal data in a lawful, fair and secure way while arranging and dispatching pre-booked passenger transport.

Scope

Applies to all personal data handled by staff, drivers, escorts and contractors, including booking data, passenger information, driver records, staff records, safeguarding information, complaints, accidents, account client information and communications.

Named responsibility

Data Protection Lead: Mohamoud Mohamed, until further appointment.

Personal data collected

- Passenger names, addresses, contact details, pickup/drop-off locations, journey times, school/setting, appointment details and booking notes.
- Parent, carer, school, council, NHS/account and emergency contact details.
- Driver, escort and staff identity, contact, licence, vetting, training, payment and performance information.
- Dispatch records, vehicle details, route records, call logs, emails, complaints, incidents and accident records.

Information asset register

The company will maintain an Information Asset Register or Data Processing Register covering passenger, driver, staff, safeguarding, booking, incident, complaint and account-client records.

Special category and sensitive data

The company may process health, disability, mobility, communication, SEND, behaviour, safeguarding and vulnerability information where needed for safe transport, contract performance or safeguarding. Criminal offence or DBS-related information is handled only where lawful and necessary for role suitability, contract compliance or regulatory purposes.

Passenger journey and safeguarding data

Journey data is used to accept bookings, allocate licensed drivers/vehicles, meet TfL/operator record requirements, manage contracts, confirm handover, investigate incidents and evidence charges. Safeguarding data is restricted and shared only where necessary to protect passengers or comply with lawful requests/contract duties.

Lawful basis

Depending on the activity, the company may rely on contract, legal obligation, legitimate interests, vital interests, public task where working under public authority instructions, or explicit consent where appropriate. Special category data is processed only where an additional UK GDPR/Data Protection Act condition applies, such as safeguarding, social care, employment obligations, vital interests or substantial public interest where relevant.

Data minimisation

Only information needed for booking, safe transport, contract compliance, safeguarding, payment, licensing, insurance or legal purposes should be collected. Route notes should be practical and proportionate; avoid unnecessary medical or family detail.

Storage and access controls

- Booking, incident and contract records must be stored in approved company systems or secure folders.
- Access is limited to people who need the information for dispatch, management, safeguarding, contract, payment or legal reasons.
- Paper records must be kept secure and not left in vehicles unless necessary for the journey and then removed promptly.
- Personal phones, WhatsApp and email must not be used for unnecessary sensitive information. Where messaging is authorised, use minimum detail and delete/transfer records as instructed.
- Passwords must not be shared. Lost devices or misdirected messages must be reported immediately.

Personal data must not be kept on personal phones, WhatsApp chats or personal email accounts longer than necessary for the journey or authorised operational purpose.

Retention

Records are retained only as long as needed for operational, contract, safeguarding, insurance, tax/accounting, employment, licensing or legal reasons. Safeguarding records may need longer retention depending on seriousness and advice from the commissioning body. The company will maintain a retention schedule and securely delete records when no longer needed.

Sharing

Personal data may be shared where lawful and necessary with TfL, councils, schools, NHS bodies, police, safeguarding partners, insurers, professional advisers, subcontractors, payment providers, DBS/council vetting bodies and emergency services. Data sharing must be proportionate and recorded where significant.

Data breaches

A data breach includes lost paperwork, wrong recipient emails/messages, unauthorised access, lost device, public disclosure, cyber incident or sharing more information than necessary. Report immediately to the Data Protection Lead. The company will assess risk, take containment action, notify affected parties and report to the ICO within required timescales where legally required.

Subject access requests

Individuals can request access to their personal data. Requests must be passed to the Data Protection Lead immediately. The company will verify identity, search relevant records, consider exemptions such as safeguarding or third-party data, and respond within the applicable legal timescale.

Staff/driver responsibilities

Staff, drivers, escorts and contractors must keep information secure, use only approved communication routes, avoid gossip, report breaches, return/delete information when work ends and cooperate with data protection reviews.

ICO registration

The company will maintain ICO registration where required for its processing activities and keep contact details up to date.

Responsibilities

The Director is accountable for data protection. The Data Protection Lead manages requests and breaches. Managers ensure operational controls. Staff, drivers, escorts and contractors follow this policy.

Procedure

Collect minimum data, use securely, share lawfully, report breaches, handle rights requests and retain/delete according to the schedule.

Records kept

Data processing register, retention schedule, breach log, SAR log, sharing records, training records and policy review notes.

Review

Reviewed annually and after any significant data breach, new system, new contract or legal change.

Approval

Signature	
Name	MOHAMOUD MOHAMED
Position	DIRECTOR
Date	06.06.2026