



## **TRANSPORT SCOTLAND**

**Extending Young Persons Free Bus Travel scheme to include 19-21 year olds**

**Data Protection Impact Assessment**

**August 2021**

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Project Name	Extending Young Persons Free Bus Travel scheme to include 19-21 year olds
Project Lead	Policy Lead: Craig McClymont/Sadiyah Rehman, Operational Lead: Philippa Carmichael/Gillian Kelly

This policy will extend the eligibility criteria in The National Bus Travel Concession Scheme for Young Persons (Scotland) Order 2021 (the [Order](#)) so that residents of Scotland aged 19-21 will be eligible to travel under the Young Persons Scheme.

In March 2021 the Scottish Parliament passed the Order giving the Scottish Ministers the powers to establish a national concessionary travel scheme for free bus travel for residents of Scotland aged under 19 (the Young Persons Scheme). On 8 March 2021 the Scottish Government announced that it would extend free bus travel under the new Young Persons Scheme to all residents of Scotland under the age of 22.

A full Data Protection Impact Assessment (DPIA) checklist was completed for the introduction of the scheme, this can be found [here](#). This document serves as an amendment to that DPIA highlighting the minor changes to the project/process the extension makes. I am content that the information being processed for this project contains mitigations to risks identified as high, or is low risk personal data.

Project Lead Signed	Sadiyah Rehman	Date	5 August 2021
Data Protection Officer Signed	Lorna Clark	Date	5 August 2021

**You must CONSIDER whether to do a DPIA** if you plan to carry out any other:

- ☐ Evaluation or scoring
- ☐ Automated decision-making with significant effects
- ☐ Systematic processing of sensitive data or data of a highly personal nature
- ☒ Processing on a large scale
- ☒ Processing of data concerning vulnerable data subjects
- ☐ Innovative technological or organisational solutions
- ☐ Processing involving preventing data subjects from exercising a right or using a service or contract
- ☐ We consider carrying out a DPIA in any major project involving the use of personal data
- ☐ If we decide not to carry out a DPIA, we document our reasons.
- ☐ We carry out a new DPIA if there is a change to the nature, scope, context or purposes of our processing.

**You MUST CARRY OUT a DPIA** if you plan to do any of the following:

- ☒ If there is a change to the nature, scope, context or purposes of our processing
- ☐ Use systematic and extensive profiling or automated decision-making to make significant decisions about people
- ☐ Process special category data or criminal offence data on a large scale
- ☐ Systematically monitor a publicly accessible place on a large scale
- ☐ Use new technologies
- ☐ Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit
- ☐ Carry out profiling on a large scale
- ☐ Process biometric or genetic data
- ☐ Combine, compare or match data from multiple sources
- ☐ Process personal data without providing a privacy notice directly to the individual
- ☒ Process personal data in a way which involves tracking individuals' online or offline location or behaviour
- ☐ Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them
- ☐ Process personal data which could result in a risk of physical harm in the event of a security breach

## Project aim

This policy will extend the eligibility criteria in The National Bus Travel Concession Scheme for Young Persons (Scotland) Order 2021 (the [Order](#)) so that residents of Scotland aged 19-21 will be eligible to travel under the Young Persons Scheme.

In March 2021 the Scottish Parliament passed the Order giving the Scottish Ministers the powers to establish a national concessionary travel scheme for free bus travel for residents of Scotland aged under 19 (the Young Persons Scheme). On 8 March 2021 the Scottish Government announced that it would extend free bus travel under the new Young Persons Scheme to all residents of Scotland under the age of 22.

The Young Persons Scheme is expected to benefit 770,000 people under the age of 19. By extending it to under 22s, the scheme is now expected to benefit a further 160,000.

A [full DPIA](#) was conducted for the under 19s scheme. The extension to the existing scheme includes a new group of individuals, 19-21 year olds, this group does not contain children who are vulnerable data subjects. We will not process data related to disabilities for this scheme, this was addressed in the [initial DPIA](#) (scope of the processing). We have not identified the need for any further control measures or mitigations that were identified in the [initial DPIA](#).

This document should be read alongside the [initial DPIA](#) for under 19s.

## Nature of the processing

Data collected for 19-21 year olds will be processed in the same way as data collected for under 19 year olds. Please refer to the [original DPIA](#) for more details.

As part of the operational delivery of the new scheme, a new Transport Scotland smartcard app will be launched. The app will allow existing cardholders to enable the digital travel product on their existing National Entitlement Card (NEC) or Young Scot branded NEC remotely. The cardholder will open the app (no sign in required) and tap their card on their mobile which uses NFC technology. This communicates the card's ISRN with the HOPS system which in turn activates the travel product. The app does not require any personal details and can be used agnostically with any NEC or YS NEC. No data is stored on the app or by Transport Scotland.

## Scope of the processing

The nature of the data collected for these additional people will be the same as the data collected for under 19 year olds. Please refer to the [original DPIA](#) for more details.

## Context of the processing

Personal data for 19-21 year olds will be collected and processed in the same way as data from under 19 year olds. Please refer to the [original DPIA](#) for more details.

## Purposes of the processing

The benefits of the scheme and processing the data are the same as the under 19s scheme. Please refer to the [original DPIA](#) for more details.

### Consultation with relevant stakeholders

We consulted with various groups of people for the under 19s scheme, please refer to the [original DPIA](#) for more details. We have consulted with the ICO on the draft regulations for the extension to the scheme who is content that this update does not introduce any additional risks. We have not identified any issues relating to 19-21 year olds that we think merit further engagement with individuals.

### Compliance and proportionality measures

The extension of the scheme to include under 22 year olds will not affect how data will be processed, this will be the same as how data is processed for under 19 year olds. Please refer to the [original DPIA](#) for more details.

## Risk Assessment

Please refer to the [original DPIA](#) for more details about the risks that have been identified. We have not identified any additional risks in relation to the extension of the scheme.

## Measures to reduce risk

Please refer to the [original DPIA](#) for more details about the measures taken to reduce risks. We have not identified any additional risks in relation to the extension of the scheme and therefore no additional measures are needed.

### Agency DPO Comment

I am content that this update to the policy and legislation does not result in any material change to the processing of personal data or additional risks to the rights and freedoms of individuals. Therefore the content of the original DPIA which set out the ways in which we would ensure compliance with the DPA principles and identified actions to minimise privacy risks remains appropriate and proportionate.

Name: Lorna Clark

Date: 5 August 2021

### DPIA Approved by IAO

Name: Laura Murdoch

Date: **10 August 2021**

<b>Version</b>	<b>Date Reviewed</b>	<b>Reviewed By</b>
1.0	6 August 2021	Tom Davy