

# Cycle Confident Ltd Privacy Policy

Version 2.0

Effective from: 4.3.2026

## 1. Who We are

Cycle Confident Ltd delivers cycle training and associated activities to schools, local authorities and organisations across the UK.

For the purposes of UK General Data Protection Regulation (UK GDPR), Cycle Confident Ltd is a **Data Controller** in respect of certain personal data and, in some circumstances, a **Joint Controller** alongside the commissioning school or organisation.

Registered company number: [Insert]

Registered address: [Insert]

Contact email: [Insert dedicated GDPR email]

## 2. When We Act as Joint Controllers

Where a school or organisation engages Cycle Confident Ltd to deliver training, both the School and Cycle Confident Ltd determine the purposes and means of processing children's data for:

- Delivery of cycle training
- Safeguarding compliance
- Incident investigation
- Programme administration
- Reporting to commissioning bodies
- Quality assurance and evaluation

In these circumstances, we act as **Joint Controllers under Article 26 UK GDPR**.

The essence of this arrangement is set out in our:

**Joint Controller Data Protection Schedule (Article 26 UK GDPR)**

[Link to our published PDF](#)

Schools agree to this arrangement as part of booking our services.

## 3. When We Act as an Independent Controller

Cycle Confident Ltd acts as an independent Data Controller where processing relates to:

- Safeguarding referrals or serious incident records
- Legal compliance and regulatory reporting
- Insurance and legal defence purposes
- Direct communications with schools or commissioners
- Recruitment and employment of staff
- Website enquiries

In these circumstances, Cycle Confident Ltd independently determines the purposes and means of processing.

## 4. What Personal Data We Process

Depending on the service delivered, this may include:

**For Children:**

- Name
- Date of birth / age / school year
- Gender / ethnicity (where required for reporting)
- Emergency contact information
- Medical or health information relevant to participation
- Special educational needs (SEN) information
- Attendance and assessment outcomes
- Incident and safeguarding records

Medical and SEN information constitutes **Special Category Data** under Article 9 UK GDPR.

**For Parents / Guardians:**

- Name
- Contact details
- Emergency contact details

**For School Staff:**

- Name and role
- Contact details

**5. Lawful Basis for Processing**

Processing is carried out under:

- Article 6(1)(e) – Public Task (where schools are public authorities)
- Article 6(1)(f) – Legitimate Interests
- Article 9(2)(g) – Substantial Public Interest (safeguarding)

Schools remain responsible for ensuring they have a lawful basis to share data with us.

Where required, parental information is provided by the School.

**6. Why We Process Data**

We process personal data to:

- Deliver cycle training safely
- Assess participant competence
- Manage health and safety
- Comply with safeguarding obligations
- Maintain accurate attendance records
- Meet commissioning and funding requirements
- Provide aggregated reporting under national assurance frameworks
- Defend legal claims or insurance matters

We do **not** use children's data for marketing purposes.

**7. Bikeability & National Reporting**

Where training is delivered under national cycle training standards, participation and outcome data may be processed for:

- Audit and verification
- Quality assurance
- Funding compliance
- National performance reporting

This processing is undertaken in line with national delivery and assurance requirements and is covered within our Joint Controller arrangement.

Data shared for reporting purposes is limited to what is necessary.

## **8. Data Retention**

We retain data only for as long as necessary, including:

- Programme records: minimum 3 years for audit and funding assurance
- Safeguarding and serious incident records: potentially up to 21 years from the date of incident (reflecting legal limitation periods involving minors)
- Insurance and legal defence records: in accordance with statutory limitation periods

Data is securely deleted or anonymised once retention periods expire.

## **9. Data Retention**

Cycle Confident Ltd maintains appropriate technical and organisational security measures including:

- Secure data transfer
- Role-based access controls
- Encryption where appropriate
- DBS-checked staff
- Data protection and safeguarding training
- Secure storage systems

## **10. Data Retention**

Individuals have the right to:

- Access personal data
- Request correction
- Request deletion (subject to safeguarding or legal obligations)
- Restrict processing
- Object to processing (where lawful basis allows)

Requests should be directed to:

[privacy@CycleConfident.com](mailto:privacy@CycleConfident.com)

Where processing is carried out under a Joint Controller arrangement, we may liaise with the School to respond appropriately.

## **11. Complaints**

If you are unhappy with how we process personal data, you may contact us directly.

You also have the right to complain to the Information Commissioner's Office (ICO):

[www.ico.org.uk](http://www.ico.org.uk)

## **12. Updates**

We may update this Privacy Notice from time to time. The latest version will always be available on our website.