

Cycle Confident Ltd

Joint Controller Data Protection Schedule

(Article 26 UK GDPR)

Version 1.0

Effective from: 1st March 2026

STATUS OF THE PARTIES

In respect of personal data relating to programme participants, the School/Organisation and Cycle Confident Ltd each determine the purposes and means of processing. Accordingly, the Parties act as Joint Controllers under Article 26 UK GDPR.

This Schedule sets out the essence of that arrangement.

ACCEPTANCE

This Data Protection Schedule forms part of Cycle Confident Ltd's standard service terms. By confirming a booking for services, the School/Organisation agrees to this arrangement.

1. Introduction

This Data Protection Schedule explains how personal data is processed where a school or organisation ("the School") engages Cycle Confident Ltd to deliver cycle training or associated activities.

For the purposes of UK General Data Protection Regulation (UK GDPR), the School and Cycle Confident Ltd each determine the purposes and means of processing personal data relating to participating children. Accordingly, the Parties act as Joint Controllers under Article 26 UK GDPR.

This Schedule sets out the essence of that arrangement.

2. Scope of Processing

This Schedule applies to personal data relating to:

- Children/pupils participating in training
- Parents or legal guardians
- Relevant school staff

It applies where personal data is shared with Cycle Confident Ltd for the purpose of delivering services.

3. Categories of Personal Data

The types of personal data typically processed include:

- Child's name
- Date of birth / age / school year / ethnicity
- Emergency contact details
- Relevant medical information
- Special educational needs (SEN) information
- Attendance records

- Assessment outcomes
- Incident or safeguarding records

Where medical or SEN information is processed, this constitutes Special Category Data under Article 9 UK GDPR.

4. Purposes of Processing

Personal data is processed for the following purposes:

- Delivery of cycle training and associated activities
- Participant safety management
- Safeguarding compliance
- Incident recording and investigation
- Programme administration
- Reporting to commissioning bodies or funding authorities
- Submission of participation and outcome data required under national Bikeability delivery and assurance standards
- Quality assurance and programme evaluation

Both Parties determine these purposes.

Audit and Funding Compliance

Where services are delivered under publicly funded programmes or national cycle training standards, relevant participation and outcome data may be shared with commissioning bodies, programme administrators or auditors for the purposes of funding verification, programme assurance and quality monitoring.

5. Lawful Basis

The School is responsible for ensuring it has an appropriate lawful basis for collecting and sharing personal data.

This will typically be:

- Article 6(1)(e) – Public task (where the School is a public authority), or
- Article 6(1)(f) – Legitimate interests

For special category data:

- Article 9(2)(g) – Substantial public interest
- Safeguarding of children and vulnerable individuals

The School remains responsible for providing privacy information to parents/guardians.

6. Allocation of Responsibilities

The School will:

- Ensure it has a lawful basis to collect and share personal data
- Provide appropriate privacy notices to parents/guardians
- Share only data necessary for programme delivery
- Transfer personal data securely to Cycle Confident Ltd

Cycle Confident Ltd will:

- Process shared data for delivery, safeguarding, monitoring and statutory reporting purposes
- Ensure staff are appropriately trained in data protection and safeguarding
- Implement appropriate technical and organisational security measures
- Restrict access to personal data on a need-to-know basis
- Maintain safeguarding and incident records as required by law
- Retain personal data only as long as necessary

Safeguarding Priority

- Where personal data processing is required to protect the safety or welfare of a child or vulnerable individual, Cycle Confident Ltd may process and share relevant information with appropriate authorities or safeguarding partners in accordance with statutory safeguarding obligations.

7. Data Subject Rights

Where a parent, guardian or data subject exercises their rights (e.g. subject access request, rectification, erasure):

- The Party receiving the request will notify the other without undue delay.
- The Parties will cooperate to ensure compliance within statutory time limits.
- The School will normally act as the primary contact for parents unless otherwise agreed.

8. Personal Data Breaches

In the event of a personal data breach:

- The Party becoming aware of the breach will inform the other without undue delay.
- The Parties will jointly assess whether notification to the Information Commissioner's Office (ICO) is required.
- The Parties will cooperate on any required communications to affected individuals.

Each Party is responsible for reporting breaches arising from its own systems or actions.

9. Data Retention

Cycle Confident Ltd retains records only for as long as necessary for:

- Safeguarding compliance
- Health and safety record-keeping
- Legal defence and insurance purposes
- Contractual and funding obligations

Retention periods are determined in line with statutory guidance and organisational data retention policies.

The School retains data in accordance with its own retention schedule.

10. Security Measures

Each Party confirms that it maintains appropriate technical and organisational measures including, but not limited to:

- Secure data transfer methods
- Access controls
- Encryption where appropriate

- Staff confidentiality obligations
- Safeguarding and data protection training
- Secure storage of digital and paper records

11. Transparency (Article 26 Requirement)

This Schedule represents the essence of the Joint Controller arrangement required under Article 26 UK GDPR.

Further information regarding how Cycle Confident Ltd processes personal data is available in our Privacy Notice.

12. Updates

Cycle Confident Ltd may update this Schedule where required by law, regulatory guidance, safeguarding standards or operational change. The current version will always be available on our website.