



**TRANSPORT  
SCOTLAND**  
CÒMHDHAIL ALBA

## **TRANSPORT SCOTLAND**

**The National Bus Travel Concession Scheme for Young  
Persons (Scotland)**

**Data Protection Impact Assessment**

**January 2021**

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Project Name	Free bus travel for under 19s
Project Lead	Policy Lead: Andy Stevenson, Operational Lead: Philippa Carmichael/Gillian Kelly

After consulting the Data Protection Impact Assessment (DPIA) checklist, I can confirm that there is a requirement for a full DPIA to be completed for our proposed new project/process. I am content that the information being processed for this project contains mitigations to risks identified as high, or is low risk personal data.

If the circumstances or scope around the project change, I understand I will be required to consult the checklist again and complete a DPIA if required.

Project Lead Signed	Andrew Stevenson	Date	19 January 2021
Data Protection Officer Signed	Lorna Clark	Date	19 January 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

**The National Bus Travel Concession Scheme for Young Persons (Scotland) Order 2021** (“the 2021 Order”) will provide for a National Bus Travel Concession Scheme for Young Persons (“the Scheme”). This will extend the bus concession in the current National Concessionary Travel Scheme for Young People in two important ways. It will replace the one-third discount for 16-18 year olds with free bus travel on local and long distance scheduled bus services in Scotland. It will also extend eligibility for the bus elements of the National Concessionary Travel Scheme for Young People to people aged under 16.

The National Bus Travel Concession Scheme for Young Persons (“the Scheme”) aligns with the Scottish Government’s National Transport Strategy vision for a transport system that:

- Takes climate action to minimise the long-term impacts of transport on our climate
- Delivers sustainable and inclusive economic growth
- Reduces inequalities and advances equality of opportunity and outcome
- Enables a healthy, active and fit nation

The scheme builds on existing Scottish Government (SG) plans and programmes to make bus travel as accessible and affordable as possible by offering a range of concessionary travel schemes for young Scots, over 60s and eligible disabled people. It represents an extension and deepening of the current discounts available on a non-statutory basis to 16-18 year olds through the Young Scot card and was committed to by the SG at the time of the 2020-21 Budget.

Implementation of the scheme is integral to realising the National Transport Strategy vision and will represent delivery of a commitment within the 2020 Programme for Government.

Applications for the scheme will be managed by the National Entitlement Card Programme Office (NECPO) on behalf of Local Authorities, as currently for older and disabled people and for the Young Scot card. In order to allow applications in as short a time as possible (and in the light of procurements for new contracts in a number of IT systems by both NECPO and Transport Scotland), the existing travel element of the Young Scot card is the preferred option for carrying the travel product to be recognized by bus operator ticket machines across Scotland.

Data collected by Transport Scotland will be the journeys made by the cardholders, as in the current scheme, which also includes limited personal details such as card reference numbers, postcode, gender, and date of birth. Journey details and related information are collected for the purpose of reimbursing bus operators in the scheme and scheme analysis. However this data will also be used to investigate matters relating to fraudulent use of the card, and to assist Police Scotland and British Transport Police with enquiries into high risk missing persons and serious crime.

A DPIA is required as the data collected relates to vulnerable data subjects and includes an extension in scope to the existing scheme to include a large new group of individuals.

## Nature of the processing

The National Entitlement Card (NEC) is a multi-functional smart card which is managed by local authorities and provides free bus travel to individuals who are eligible for the national concessionary travel scheme. The card provides free bus travel amongst other local authority services, however the reference to suspension of the card within the Order relates solely to the free bus travel aspect and will not affect other services.

We will expect delivery partners (such as local authorities) to conduct their own DPIAs, where required in line with ICO guidance, and engage with us and/or the ICO as necessary where they produce any residual risks where they cannot identify appropriate safeguards to mitigate. Information relating to journeys is collected from electronic ticket machines on buses, which is downloaded to bus operator back office systems and then sent to Transport Scotland's systems electronically.

Information relating to the cardholder (card numbers/date of birth/gender/postcode) is collected at the time of processing the application form and creating the card. When the card is created, electronic 'card and product creation messages' are sent to Transport Scotland's systems.

Data processed by Transport Scotland is not generally personal data, as the NEC information processed does not identify a person. In special circumstances where data subject questions are asked, where fraud may be suspected or where Police Scotland request information to assist with their work, Transport Scotland may ask NECPO for relevant personal details. Such sharing of data is covered by a data sharing agreement.

This information is stored electronically and securely in the Transport Scotland HOPS (Host Operator or Processing System) and certain details are passed electronically to Fareshare (reimbursement and analytical system). Normal Scottish Government/Transport Scotland retention and destruction rules will apply to this information which will be reviewed on an annual basis. The concessionary travel scheme is run on the ITSO platform and as part of our ITSO obligations data has to be held for a minimum of seven years. ITSO is the standard and specification that Transport Scotland adhere to for smart ticketing relating to the concessionary travel schemes (<https://www.itso.org.uk/about-us/>).

Journey details and related information is collected for the purpose of reimbursing transport operators in the scheme and scheme analysis. However this data may also be used to investigate matters relating to fraudulent use of the card and may be shared by Transport Scotland with relevant organisations in our role as a Specialist Reporting Agency, and to assist Police Scotland and British Transport Police with enquiries into high risk missing persons and serious crime.

Some of the information captured, when combined with other data, may be deemed sensitive in nature. This is because personal data processed in relation to this scheme could be used to track the movements of a particular individual when the information held by NECPO and Transport Scotland are combined – however in isolation this cannot happen and is only done in specific circumstances (e.g. on request from Police Scotland when vulnerable missing people/serious crime involved)

See Data sharing flow map in Annex A.

## Scope of the processing

Journey data will be collected electronically from bus operators across Scotland (and into England as far as Berwick Upon Tweed and Carlisle) for each journey made with a NCTS card by the Transport Scotland HOPS and sent to the Fareshare system. This journey data will be processed to allow payments to be made (after verification) to bus operators who participate in the scheme.

Data will be processed for statistical and financial purposes. Data will be interrogated for any subject access requests under GDPR. For a small number of transactions, further analysis may be undertaken to detect fraud or to help Police Scotland and British Transport Police with enquiries into high risk missing persons or serious crime. Processing will only take place within the limits set out in the NCTS Privacy Statement published on the TS website (link: <https://www.transport.gov.scot/concessionary-travel/60plus-or-disabled/our-concessionary-travel-and-smart-ticketing-privacy-policy/> )

There are an expected 770,000 young people who will become eligible as a result of this extension to the scheme. Developing the policy for free bus travel has involved work with representatives of a number of agencies involved with child protection, such as Social Work Scotland and Barnardo's, and those who support vulnerable children, including Police Scotland and Action for Children. Where risks have been identified, mitigating action is being considered and will be subject to further work. On review of the Age Appropriate Design Code we have determined that this processing is not within the scope . However, we will take the principles onboard in developing our communications with young people. In addition, parental approval will be required for applications on behalf of younger children, so that parents are aware of the potential to travel free by bus. The public consultation will provide input to the question of the age at which young people can themselves apply for free bus travel, and consideration is being given to setting the age at anyone up to 16 years old. Further reference to the protection measures is given in the Children's Rights and Wellbeing Impact Assessment, to be published with the Regulations.

We will not process special category data specifically for the purposes of the U19 scheme (but we do as a matter of course for the overall concessionary travel scheme as it is applicable to disabled people which involves processing health information). Special category or criminal offence data may occasionally be received by Police Scotland and British Transport Police under our existing Data Sharing Agreement with them covering enquiries into high risk missing persons and serious crime. There were around 1-3 enquiries per week during 2020 under these arrangements involving the existing NCTS and the non-statutory young person's scheme.

Transport Scotland are also a specialist reporting agency, which means TS can report cases directly to the Procurator Fiscal (<https://www.copfs.gov.uk/publications/10-about-us/296-specialist-reporting-agencies>), and therefore may occasionally process criminal offence data in relation to a fraud investigation. This is infrequent and reactive in nature and relevant schedule 2 part 1 condition of the DPA 2018 is paragraph 6 ("statutory etc. and government purposes").

## Context of the processing

The policy will extend the benefits of free bus travel to all children and young people up to and including the age of 18 years. Personal data for young people will relate to applications (held only by local authorities and NECPO but postcode, gender and date of birth information will be transferred to Transport Scotland), and to journeys made with the card, transferred from bus operators. Parents, corporate parents or guardians will need to make applications for younger children under a certain age (to be decided during policy development). Individuals will be provided with appropriate privacy information at the point of application, as a web link to Transport Scotland Concessionary Travel pages containing the [Privacy Statement](#) which is in the application form. Similar privacy information for the Young Scot card is available on their web site. We will consider the principles of the Age Appropriate Design Code when engaging with delivery partners on their DPIAs and communication with young people when the scheme is being implemented.

The TS concessionary travel Privacy Statement sets out how information might be used in order to provide services to card holders. The data will be processed to provide reimbursement for concessionary journeys made by cardholders and for some statistical analysis to take place. The privacy information sets out how data subjects can exercise their rights under GDPR.

Details would be stored within the TS HOPS and within Fareshare and access would be restricted to specific users who require the data.

## Purposes of the processing

The benefits of free bus travel through NCTS will be extended to young people up to, and including, the day before their 19<sup>th</sup> birthday. This can encourage families to use cars less for the school run and transport to leisure activities, instead using low-emission and lower carbon public transport, which is central to tackling the climate emergency. Reducing the cost of bus travel for families would make private car use less attractive, which would be likely to improve air quality in our towns and cities aided by the environmental benefits of innovation in bus transport.

This aim is aligned with the Scottish Government's National Transport Strategy for the next 20 years, published in February 2020. This seeks to reduce inequalities and advance equality of opportunity and outcome, take climate action to make travel choices that minimise the long-term impacts on our climate, develop a transport system that will help deliver sustainable and inclusive economic growth and which will be safe and enable a healthy, active and fit nation. The Climate Change Plan Update has also identified the need to reduce private car vehicle miles travelled by 20 percent

The data is processed to allow accurate reimbursement to bus operators for the passenger journeys they are providing as part of the NCTS, to maintain the integrity of the scheme and to enable its impacts to be analysed.

With regards to the Data Sharing Agreement (DSA) with Police Scotland and British Transport Police the purposes are:

- (a) the prevention and detection of Serious Crime;
- (b) the apprehension and prosecution of offenders in relation to Serious Crime;
- (c) the administration of justice in relation to Serious Crime; and
- (d) the protection of vital interests of individuals.



## **Consultation with relevant stakeholders**

Consultation will be/has been undertaken with young people and with agencies relevant to the policy, eg Young Scot, Local Authorities and NECPO, and with bus operators. The privacy and data protection aspects of the policy will be implemented as for current cardholders in the NCTS. The Information Commissioners Office will be included in the consultation. Consultation with contacts from Police Scotland, Social Workers and Scottish Government Children and Families policy makers are being undertaken. A public [consultation](#) took place between 26 October and 7 December 2020.

## Compliance and proportionality measures

### Principle 1 – Lawfulness, Fairness & Transparency

All data will be processed lawfully, fairly and in a transparent manner, as per the terms of the published TS Concessionary Travel Privacy Policy.

The Article 6 lawful basis for the processing of personal data in relation to the provision of free bus travel for young people is Public Task as we are a public authority exercising our functions as set out in law and it is necessary for the delivery of this service. The National Bus Travel Concession Scheme for Young Persons (Scotland) Order 2021 is made in exercise of the powers conferred by section 40(1), (3), (4), (7) and 52(4) of the Transport (Scotland) Act 2005.

The Article 6 lawful bases for processing personal data when sharing information relating to the scheme, with the COPFS, Police Scotland and the British Transport Police, are outlined below.

#### Lawful basis for Processing

(a) The legal grounds for sharing Personal Data by Transport Scotland under this Agreement are:

- (i) Processing is necessary in order to protect the vital interests of the Data Subject or of another natural person as outlined in Article 6(1)(d) of GDPR;
- (ii) Processing is necessary for compliance with a legal obligation to which the Controller is subject as outlined in Article 6(1)(c) of GDPR; or
- (iii) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller as outlined in Article 6(1)(e) of GDPR.

(b) The legal grounds of Transport Scotland for Processing special categories of Personal Data under this Agreement are:

- (i) Processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent as outlined in Article 9(2)(c) of GDPR; or
- (ii) Processing is necessary for reasons of substantial public interest, as outlined in Article 9(2)(g) of GDPR. The relevant schedule 2 part 1 condition of the DPA 2018 is paragraph 6 (“statutory etc. and government purposes”).

(c) Police Scotland and BTP are each responsible for ensuring that they have a valid basis under Data Protection Laws to Process and share Personal Data provided by Transport Scotland. The legal grounds for sharing and Processing Personal Data by Police Scotland and BTP under this Agreement are: public task (in terms of article 6(1)(e) of the General Data Protection Regulation) and detailed for Police Scotland in sections 20 and 32 of the Police and Fire Reform (Scotland) Act 2012), namely:

- to prevent and detect crime, and protect life and property
- to improve the safety and well-being of persons, localities and communities in Scotland, and
- working in collaboration with others where appropriate, seek to achieve that main purpose by policing in a way which
  - (i) is accessible to, and engaged with, local communities, and
  - (ii) promotes measures to prevent crime, harm and disorder

(d) BTP's powers as a Police Force derive from the Railways and Transport Safety Act 2003 which confers on BTP officers all the powers and privileges of a constable. British Transport Police manage information in line with the Code of Practice on the Management of Police Information which states that use of information must be consistent with the common law policing purposes as defined in the statutory code of practice as follows:

- Protecting life and property
- Preserving order
- Preventing the commissioning of offences
- Bringing offenders to justice
- Any duty or responsibility of the Police arising from common or statute law.

Prior to scheme inception the full communications package and media used for this will be reviewed to ensure it is age appropriate and will reach the intended groups in Scotland. The Privacy Policy will be included in this review.

### **Principle 2 – Purpose Limitation**

The data is processed only for specific purposes, to allow accurate reimbursement to bus operators for the passenger journeys they are providing as part of the NCTS, to maintain the integrity of the scheme and to enable its impacts to be analysed.

### **Principle 3 – Data Minimisation**

The information is restricted to gender (optional disclosure), date of birth and postcode data for the purposes of scheme audit, for analytical and statistical needs, including Equalities Assessments, and to inform future Government policy. This also provides the ability for data minimisation in police enquiries, for example reducing the data shared in investigations by filtering these categories.

Operators do not have access to data on gender, date of birth or postcode, and instead only have data on MCRN and ISRN card numbers which, in isolation, cannot identify an individual. Transport Scotland also have access to these two card numbers for the purposes of reimbursement and scheme audit.

The historical practice of including name, address, telephone number, and email address in the Transport Scotland HOPS was reviewed in response to GDPR inception and excluded, with any existing data held also updated to this effect.

### **Principle 4 – Accuracy**

The data is accurate at the point of collection as per Local Authority processes and at the point of an electronic journey being generated. Local authorities and Transport Operators will have responsibility for accurate data, with processes in place to check and allow for any inaccurate data to be rectified. Both HOPS and Fareshare have built in audit trail to ensure any changes can be tracked with different permissions given to each user based on role.

### **Principle 5 – Storage Limitation**

Transport Scotland data retention and destruction guidelines will be used and adhered to, these are specified within the privacy policy as follows:

- We retain concessionary cardholder information (excluding journey information) whilst the concession is valid and for a period of 7 years after the expiry of your concession.
- We retain journey information for a period of 7 years after the journey takes place.

- We retain information (including journey information) relating to fraud and misuse for 15 years after the fraud or misuse inquiry has been dealt with.
- We retain information in connection with queries (which does not fall into any of the above categories) for a period of 6 years following receipt of the query.

With regards to NECPO/Local Authorities, as data is used to provide and administer a personalised smartcard and allow efficient and customer-friendly access to various Scottish public sector services, and is provided on the basis of an individual applying to make use of the NEC, core data is held until either such time that the individual is no longer entitled to receive services in Scotland or until the individual decides they no longer wish to have an NEC

#### **Principle 6 - Integrity & Confidentiality**

There will be appropriate protection and security in place to ensure authorised and lawful processing, and to prevent accidental loss or destruction or damage of information including integrity and confidentiality of data. Data will be backed up and accessed using systems that comply with relevant SG IT and digital standards. IT security and physical security will be addressed with the data being held on secure systems with defined access rights, and only persons responsible for processing data will have access. The systems have been penetration/vulnerability tested. Transport Scotland's IT suppliers are contractually obliged to be NQA ICO 27001 certified.

#### **Principle 7 – Accountability**

This is managed for processes undertaken by Transport Scotland by ensuring agreed processing, checking & retention guidelines are adhered to with the data and any related documents being stored on a secure system. Persons responsible will be following established processes in the existing NCTS and understand procedures relating to compliance of GDPR. All staff must carry out annual mandatory data protection training. Data protection guidance and policies are publicised on the staff intranet and there are specific procedures within the concessionary travel scheme for handling requests for information. There are also dedicated members within the team who promote data compliance.

Function creep should not be an issue as there is no requirement for the scope of the functionality of Transport Scotland's systems to widen beyond which are currently in place, other than an extension to include a new group of people.

No data is transferred to another country during processing.

## Risk Assessment

Risk No.	Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
1	<p><b>Unauthorised Access</b></p> <p>Risk that those without permissions obtain access to the personal data of data subjects.</p>	<p>Remote</p> <p>Possible</p> <p>Probable</p>	<p>Minimal</p> <p>Moderate</p> <p>Severe</p>	<p>Low</p> <p>Medium</p> <p>High</p>
2	<p><b>Compliance</b></p> <p>Risk of staff failing to comply with TS and SG Data Protection policies and procedures when handling personal data.</p>	<p>Remote</p> <p>Possible</p> <p>Probable</p>	<p>Minimal</p> <p>Moderate</p> <p>Severe</p>	<p>Low</p> <p>Medium</p> <p>High</p>
3	<p><b>Data loss or corruption</b></p> <p>Risk that systems suppliers for HOPS and Fareshare fail to back up data and it is lost or it becomes corrupted and therefore we would be unable to retrieve journey data that may be required for handling subject access requests/ requests from Police Scotland.</p>	<p>Remote</p> <p>Possible</p> <p>Probable</p>	<p>Minimal</p> <p>Moderate</p> <p>Severe</p>	<p>Low</p> <p>Medium</p> <p>High</p>
4	<p>&lt;Text redacted for publication&gt;</p>			
5	<p><b>Information and Communications</b></p> <p>There is a risk that users of the Scheme do not fully understand what they are signing up to and their associated rights under GDPR/DPA.</p>	<p>Remote</p> <p>Possible</p> <p>Probable</p>	<p>Minimal</p> <p>Moderate</p> <p>Severe</p>	<p>Low</p> <p>Medium</p> <p>High</p>

## Measures to reduce risk

Risk No.	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
1	<p><b>Unauthorised Access</b></p> <p>The data is held on secure systems with defined access rights, only persons responsible for processing data will have access. The systems have been penetration/vulnerability tested and so we think the likelihood of occurrence is remote. It is also unlikely any personal data visible, including journey details, card numbers, date of birth, gender and postcode that Transport Scotland processes, would in isolation be identifiable to a specific person.</p>	<p>Eliminated</p> <p><b>Reduced</b></p> <p>Accepted</p>	<p><b>Low</b></p> <p>Medium</p> <p>High</p>	<p>Yes</p> <p>No</p>
2	<p><b>Compliance</b></p> <p>All staff must carry out annual mandatory data protection training. Data protection guidance and policies are publicised on the staff intranet and there are specific procedures within the concessionary travel scheme for handling requests for information. There are dedicated members within the team who promote data protection compliance.</p>	<p>Eliminated</p> <p><b>Reduced</b></p> <p>Accepted</p>	<p><b>Low</b></p> <p>Medium</p> <p>High</p>	<p>Yes</p> <p>No</p>
3	<p><b>Data loss or corruption</b></p> <p>Data contained within the HOPS and Fareshare is backed up and complies with relevant IT and digital standards.</p>	<p>Eliminated</p> <p><b>Reduced</b></p> <p>Accepted</p>	<p><b>Low</b></p> <p>Medium</p> <p>High</p>	<p>Yes</p> <p>No</p>
4	<p><b>&lt;Text redacted for publication&gt;</b></p>			
5	<p><b>Information and Communications –</b></p> <p>We have reviewed the Age Appropriate Design Code and while we have determined that this processing is outwith scope, Scottish Ministers and delivery partners will take into account the code transparency principle by ensuring that all communications with all young people are age appropriate and fully understandable.</p>	<p>Eliminated</p> <p><b>Reduced</b></p> <p>Accepted</p>	<p><b>Low</b></p> <p>Medium</p> <p>High</p>	<p>Yes</p> <p>No</p>

**DPO Comment**

Comment:

I am content that privacy risks have been considered and that there are no residual high risks in relation to the proposed Order following the appropriate safeguards that have been identified. We have consulted with the Information Commissioner's Office (ICO) in relation to the legislation and their advice has been taken into account – we will continue to take note of their advice during implementation phases.

Name: Lorna Clark

Date: 19 January 2021

**DPIA Approved by IAO**

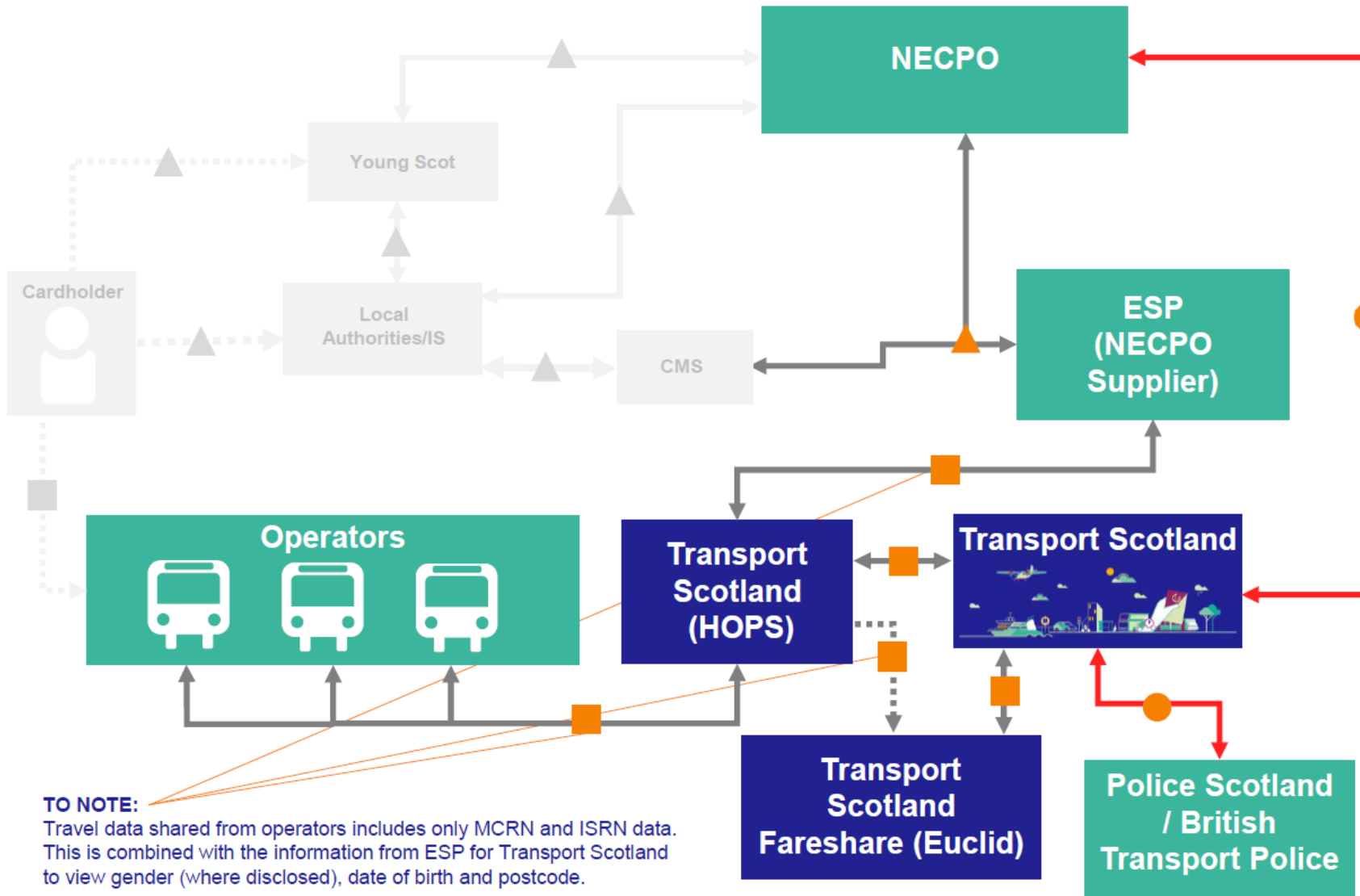
Name: David Swanson

Date: 19<sup>th</sup> January 2021

<b>Version</b>	<b>Date Reviewed</b>	<b>Reviewed By</b>

# Annex A – Data sharing flow map

## National Concessionary Travel Scheme – Data Flow Map



Personal and non-personal data pertaining to the National Concessionary Travel Scheme is separated between NECPO and Transport Scotland. NECPO has immediate access to personal data from National Entitlement Card (NEC) applications, via Local Authorities, such as full name, D.O.B, address, etc. Whilst Transport Scotland has immediate access to cardholder travel data, including NEC ISRN and ITSO numbers which are unique to each cardholder. In isolation, the data Transport Scotland manage cannot identify a specific individual, however we have channels open with NECPO to amalgamate data in limited circumstances, for example, to assist Police Scotland with a missing person's case.

**Key**

- The critical point of data sharing is indicated in the red, two-way arrows that are crossed by the orange circle. This illustrates where personal data from NECPO can be combined with travel data from Transport Scotland to identify a specific individual.
- Elsewhere, lines crossing squares indicate the flow of travel data.
- Lines crossing triangles indicate the flow of personal data.
- Dashed lines indicate where data only flows in one direction.

Transport Scotland does not have direct contact or responsibility for points in light grey.

**TO NOTE:** Travel data shared from operators includes only MCRN and ISRN data. This is combined with the information from ESP for Transport Scotland to view gender (where disclosed), date of birth and postcode.