



Working together to be the best that we can be

LEGITIMATE INTEREST ASSESSMENT – SCHOOL MONEY

PART 1 - PURPOSE TEST

Why do you want to process the data? – SchoolMoney is a fully integrated online payment system with a dinner money (enabling the school to pre book school meals), breakfast and after school club(s), uniform, and school trips (giving consent and allowing payments). SchoolMoney provides a cashless solution and is designed to help schools reduce the time taken to administer expenditure every day. SchoolMoney keeps track of individual pupil's balances as meals are recorded and payments taken, including the option for parents to order and pay meals online or via the SchoolMoney app (using a laptop, mobile phone, or tablet). Pupil data is uploaded into SchoolMoney via a connector service using personal data from the school's management information system.

What benefit do you expect to get from the processing? – Meals can be recorded daily/weekly by the school office highlighting payments against the pupil and selected online by the parent/guardian. SchoolMoney provides an audit trail of payments and expenditure in a cashless and cost efficient and timely way.

Do any third parties benefit from the processing? - No

Are there any wider public benefits to the processing? – No

How important are the benefits that you have identified? – SchoolMoney provides an audit trail of payments and expenditure and ensures the service is fully costed with adequate cash flow. It also enables the school to set up and select their own lunch options, along with prices. Once the meals are recorded the school can generate a report to let the kitchen know how many meals to prepare leading to more efficiency and less waste.

What would the impact be if you couldn't go ahead with the processing? – The service provision would be less efficient with the possibilities of inconsistencies when it comes to pupils either receiving or not receiving meals. Overall the service would be more costly and less environmentally friendly.

Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)? –

The lawful basis in order to process personal data in line with the 'lawfulness, fairness and transparency principle is as follows:

6.1 (c) Processing is necessary for compliance with a legal obligation to which the controller is subject; e.g. health & safety and safeguarding

6.1 (e) 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.

6.1 (f) Processing is necessary for the purposes of the legitimate interest pursued by the controller or by a third party

The school has highlighted legitimate interests as the lawful basis by which it processes personal data. This is recorded in Russells Hall Primary School Privacy Notice (Pupil)

Are you complying with other relevant laws? – Please see the school's Privacy Notice (Pupil).

Are you complying with industry guidelines or codes of practice? – Department of Education guidance, and ICO guidance.

Are there any other ethical issues with the processing? – No.

PART 2 - NECESSITY TEST

Will this processing actually help you achieve your purpose? – By Russells Hall Primary School using personal data from its management information system the parent will be assured that their children will have access to the school meal provision. SchoolMoney users will have individual user accounts to log into and to retrieve information.

Is the processing proportionate to that purpose? – SchoolMoney will be used to manage the school meal provision, breakfast and after school club(s), uniform, and school trips (giving consent and allowing payments). There is also the additional functionality of the SchoolMoney app for the school to communicate with the parent. The legitimate interest test will be identified as the lawful basis for processing personal data in the Russells Hall Primary School Privacy Notice (Pupil).

Can you achieve the same purpose without the processing? – Yes. However, the service provision would be less efficient with the possibilities of inconsistencies when it comes to pupils either receiving or not receiving meals. Overall the service would be more costly and less environmentally friendly.

Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way? –

SchoolMoney will only be using personal data to manage the school meal provision obtained from Russells Hall Primary School management information system.

PART 3 - BALANCING TEST

Nature of the personal data

Is it special category data or criminal offence data? – Personal data will be collected from the management information system. Some of the personal data may fall under the UK GDPR special category data. This is for the purposes of health and safety and respecting the religious beliefs of pupils attending the school. SchoolMoney will record this information against the name of the pupil.

Is it data which people are likely to consider particularly ‘private’? – SchoolMoney collects the following information:

Pupil – SchoolMoney service imports the following data fields. Management information system ID, Admissions Number, Name, Gender, and Registration and Year Group. The following is optional: Free School Meal status, Admissions Status, Meal Information (Dinner Money), Dietary Needs, Medical Conditions.

Workforce – Management information system ID, Name.

Parental Responsibility of one or more pupils (Priority 1 contacts) – Management information system ID, Name, E-mail, Mobile phone number, Parental Responsibility and Priority.

Credit card/debit card information is handled by SchoolMoney’s payment provider (Secure Trading). Secure Trading does not have access to the SchoolMoney platform and is only used in the process of making payment by the parent.

Are you processing children’s data or data relating to other vulnerable people? – Yes, please see above.

Is the data about people in their personal or professional capacity? – No.

Reasonable expectations

Do you have an existing relationship with the individual? – Information is obtained from those with parental responsibility as part of the enrolment of the child to Russells Hall Primary School. This information is collected via registration forms when a pupil joins the school, pupil update forms the school issue at the start of the year, Common Transfer File (CTF) or secure file transfer from previous schools.

What’s the nature of the relationship and how have you used data in the past? – It is the child parent relationship. The information is processed and stored on the Russells Hall Primary School management information system.

Did you collect the data directly from the individual? What did you tell them at the time? – Information was collected from those with parental responsibility for the enrolment of the child to Russells Hall Primary School.

SchoolMoney obtains information from Russells Hall Primary School management information system. This is highlighted in the school’s Privacy Notice (Pupil).

If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you? – The information was not obtained from a third party.

How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations? – The information was collected when the child enrolled at Russells Hall Primary School.

Is your intended purpose and method widely understood? – The lawful basis for processing personal data is highlighted in the Russells Hall Primary School Privacy Notice (Pupil).

Are you intending to do anything new or innovative? – No.

Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation? – No.

Are there any other factors in the particular circumstances that mean they would or would not expect the processing? – There is an expectation that those with parental responsibility that have opted for the school meal service on behalf of their children receive the service as outlined by the school.

Likely impact

What are the possible impacts of the processing on people? – Limited.

Will individuals lose any control over the use of their personal data? – No.

What is the likelihood and severity of any potential impact? – It would be minimal.

Are some people likely to object to the processing or find it intrusive? – It is very unlikely.

Would you be happy to explain the processing to individuals? – Yes.

Can you adopt any safeguards to minimise the impact? – The personal data is obtained from Russells Hall Primary School management information system.

Can you offer individuals an opt-out - No

MAKING THE DECISION

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer? (optional)	
There is an expectation that those with parental responsibility that have opted for the school meal service breakfast and/or after school club(s), uniform, and school trips receive the service as outlined by the school.	
LIA completed by	
Date	

WHAT'S NEXT

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.