

Straits Primary School

LIA Tucasi

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

Why do you want to process the data? – Tucasi is a fully integrated software solution with a dinner money, extended day, and trip modules which is designed to help schools reduce the time taken to administer expenditure every day. Tucasi 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. Pupil data is uploaded into Tucasi using csv file generated 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. Tucasi provides an audit trail of payments and expenditure in a 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? - Tucasi 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 **Straits 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?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

Will this processing actually help you achieve your purpose? - By **Straits 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. Tucasi users (staff) may have individual user accounts to log into Tucasi to retrieve information. Parents may have accounts to manage their payments.

Is the processing proportionate to that purpose? – Tucasi service will only be used to manage the school meal provision. The legitimate interest test will be identified as the lawful basis for processing personal data in the **Straits 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? – The Tucasi service will only be using personal data to manage the school meal provision obtained from **Straits Primary School** management information system.

Part 3: Balancing test

Nature of the personal data

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?
- Is the data about people in their personal or professional capacity?

Is it special category data or criminal offence data? – **[ScoPay app]** None of the personal data collected falls under the UK GDPR special category data. This includes race; ethnic origin; religion; biometrics; and health. These may be contained in the Single Central Record, RM Integris, child safeguarding files, SEN reports, etc.

Is it data which people are likely to consider particularly 'private'? –

Pupil data relates to personal identifiers and contacts (such as name, unique pupil number, contact details and address). The Privacy Policy for Tucasi states that the following personal data will be collected: pupil information including the pupil name, pupil UPN (unique pupil number), pupil class name, pupil premium and details of those pupils that have free school meals.

Parental/guardian information will be collected relating to Parent/Guardian name, parent/guardian e-mail address, and parent/guardian contact number.

It also states under the 'data minimization' principle that Tucasi will never collect any unnecessary personal data from the school and will not process school information in any way, other than that specified in the Privacy Notice for Tucasi.

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?
- What's the nature of the relationship and how have you used data in the past?
- Did you collect the data directly from the individual? What did you tell them at the time?
- 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?

- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?
- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

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 **Straits 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 **Straits 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 **Straits Primary School**

ScoPay obtains information from **Straits 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 to **Straits Primary School**

Is your intended purpose and method widely understood? – The lawful basis for processing personal data is highlighted in the **Straits 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?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the 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 **Straits 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 on behalf of their children receive the service as outlined by the school.

LIA completed by	YourIG / Paul Freear
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