PRIVACY NOTICE

Education – Cashless Accounts in Schools

Who we are

Moray Council, Council Office, High Street, Elgin, Moray, IV30 1BX, www.moray.gov.uk 01343 543451, is a Local Authority established under the Local Government etc. (Scotland) Act 1994. We are the Data Controller of the personal data being collected.

Why we are collecting your personal data

Moray Council administers a cashless service used in Moray schools, which includes:

iPayimpact

All pupils may have a cashless account in their designated school. These accounts can be topped up online or in cash at their designated school. Parents/Carers may have their own accounts, which can be linked to their child(ren)'s account(s) to enable them to top up online. iPayimpact accounts may be used for a variety of payments, including cashless catering, school trips and suchlike. The personal data utilised includes:

- Pupil: forename, surname, (known as), year/class, user type (e.g. pupil/staff), free school meal entitlement, date of birth, and SEEMiS unique reference number, transaction history, and iPayimpact ID number.
- Parent/Carer: forename, surname, email address, home address, mobile number, and iPayimpact ID number per child
- Staff: forename, surname and corporate email address, and user type (e.g. pupil/staff), transaction history, and iPayimpact ID number.

Fusion (cashless catering system):

In secondary schools, this cashless system may be used by pupils and Council education staff. Personal data is collected so that school meals can be ordered, paid for and to ensure that free school meals are correctly allocated. The data collected includes:

- Pupil: forename, surname, (known as), year/class, user type (e.g. pupil/staff), free school meal entitlement, date of birth, SEEMiS unique reference number, and transaction history. Headshot of Pupil (if held on SEEMiS), NEC number and iPayimpact ID number. Allergens and any dietary restrictions may be added to their account.
- Parent/Carer: forename, surname, email address and SEEMiS unique reference number of pupil.
- Staff: forename, surname, corporate email address, user type (e.g. pupil/staff), transaction history, and iPayimpact ID number. Allergens and any dietary restrictions may be added to their account.

To identify pupils and ensure that they are linked to the correct pupil's account at the cashless catering tills, pupils can use a Young Scot National Entitlement Card (NEC)

linked to their account, a unique pin code provided by Education or Catering Services (if they don't have an NEC), or, pupils can provide their details at the till and be manually linked to their account by catering staff.

- National Entitlement Card (NEC): Pupils can register their NEC with their Fusion account. A linking code will be stored on their Fusion account, proving the identity of the pupil. Only the unique linking code is stored; no information from NEC will be stored or processed by the Council.
- Pin Code: This can be generated by Fusion against a pupil's account and used as an identification method at the cashless till at the point of sale. This uses information already held by Education and Catering Services.
- Manual look up: Catering staff can manually identify pupils on the Fusion using information already held by Education and Catering Services – pupil name, year group and if necessary, date of birth.

Our legal basis

Whenever the Council processes personal data we need to make sure we have a legal basis for doing so. We understand the Council's legal basis in Data Protection law to be Article 6(1)(e) of the United Kingdom General Data Protection Regulation (UK GDPR) because your personal data is necessary for the performance of a task carried out in the public interest. The Council has a duty to promote the availability of school lunches in public schools and other educational establishments under the authority's management, and, to encourage pupils in attendance at those schools and other educational establishments to consume school lunches. The Council also has a responsibility to ensure that free school meals are provided appropriately i.e. to ensure that the identities of pupils in receipt of free school meals are protected and not disclosed unnecessarily. These responsibilities and duties are set out under:

- Education (Scotland) Act 1980
- Schools (Health Promotion and Nutrition) (Scotland) Act 2007
- Children and Young People (Scotland) Act 2014

Personal data that counts as 'special category data', such as the health information of pupils who have food allergies or require a medically prescribed diet, must satisfy extra conditions when processed. We understand our legal basis in data protection law for processing this special category data to be Article 9(2)(g) of the UK GDPR and Schedule 1, Part 2, Paragraph 6 of the Data Protection Act 2018, as the processing is necessary for reasons of substantial public interest for statutory and government purposes. The processing is necessary for the exercise of functions conferred under the Education (Scotland) Act 1980, Schools (Health Promotion and Nutrition) (Scotland) Act 2007 and the Children and Young People (Scotland) Act 2014.

Who we share this personal data with

This personal data will be shared with CRB Cunninghams Limited who provide the Fusion cashless catering system used in secondary schools and the iPayimpact system. Payment details will be shared with Vesta Merchant Services who process card payments within iPayimpact. We make sure that these organisations process your personal data appropriately through our contractual arrangements with them.

Personal data may be shared internally with authorised officers of the Council if having access to personal data is a necessary part of their roles to ensure records are accurate and up to date. It may also be shared with other relevant Council Services where applicable.

The Council may share this personal data with other relevant Council Services and third parties where we are under a legal obligation to do so. For example, this may be with Police, Social Security Scotland, UK Border Agency or other Registered Professional Bodies.

The Council is required by law to protect public funds against fraud. It may share personal data with other relevant Council Services and third parties responsible for auditing and administering public funds, or who otherwise have responsibility for preventing and detecting fraud.

How long the personal data is held for

Your personal data will be securely stored by Moray Council for a pre-determined length of time. Information is only kept for the minimum amount of time necessary. We maintain a record retention schedule which sets out how long we retain different types of personal data. This is available on our website: www.moray.gov.uk/RetentionSchedules

The Council stores information within the UK.

Your rights

Moray Council is the Data Controller for this personal data. You have legal rights about the way the Council handles and uses your personal data. These include the right to ask for a copy of it, to ask us to correct it and to ask us to stop doing something with your personal data.

As so far as the legislation permits, you also have the right to request the deletion of your data, and to object to the processing.

For more information about these rights, please see the Information Management pages on the Council's website here: www.moray.gov.uk/InformationRights. Alternatively, email the Council's Data Protection Officer at: IG@moray.gov.uk

If you have a concern about the way the Council has handled your personal data, you can make a complaint to the Council's Data Protection Officer in the first instance; an e-form is available on the Council's website here: www.moray.gov.uk/Complaints

You also have the right to make a complaint to the Information Commissioner's Office. They are the body responsible for making sure organisations like the Council handle your personal data lawfully.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113 Website: https://ico.org.uk/
Online: https://ico.org.uk/make-a-complaint/data-protection-complaints/