

## Perth and Kinross Council Privacy Notice

**Name of Processing Activity - School Meals System (*cashless catering*)**

**Date notice written – August 2019**

### **1. Why is this information being processed?**

The information provided by you will be used by Perth & Kinross Council to manage pupil accounts on the school meals system. It will ensure free school meals are correctly allocated, allow non-cash transactions at points of sale and facilitate classroom meal selection.

### **2. Who is processing this information?**

The personal information you've provided will be processed by Perth and Kinross Council, 2 High Street, Perth, PH1 5PH, [enquiries@pkc.gov.uk](mailto:enquiries@pkc.gov.uk) , 01738 475000.

### **3. Why is it lawful for the Council to process this information?**

The Council is permitted to process your personal data in this way in order to manage its provision of school meals correctly and to that free school meals are provided appropriately i.e. without the identity of recipients being disclosed unnecessarily.

The processing of personal data provided to us for this purpose satisfies Article 6 (c) of the General Data Protection Regulation - *Processing shall be lawful...to the extent that processing is necessary for compliance with a legal obligation to which the controller is subject.*

In this case, the legal obligation to provide and promote school meals and to protect the identity of pupils receiving free meals is placed on the Council by the Education (Scotland) Act 1980.

**4. Will any sensitive personal information (Special Category Data or information about criminal convictions etc.) be processed?**

Information about health may be processed in relation to pupils who have food allergies or who require a medically- prescribed diet.

**If so, why is it lawful for the Council to process this information?**

Article 9 (2)(g) of the GDPR, with reference to Schedule 1, Part 2, 6 (2) (a) of the Data Protection Act 2018, permits the processing of Special Category Data when *processing is necessary for reasons of substantial public interest.*, and the purposes of processing is in *the exercise of a function conferred on a person by an enactment or rule of law.* In this case, the law in question is the Education (Scotland) Act 1980.

**5. Will this information be shared?**

The information provided will be shared with Tayside Contracts which provides the school meals service on behalf of PKC.

Your personal information will not be disclosed to other third parties unless it's necessary for us to do so in order to verify its accuracy, prevent or detect crime, protect public funds or where required by law. The Council may check information provided by you, or information about you provided by a third party, with other information held by us.

**6. How long will this information be kept for?**

Personal information held on Perth and Kinross Council systems in relation to school meals cashless catering is kept for the duration of a pupil's attendance at a council school, after which it will be deleted at the end of the school year associated with departure. After this it will be deleted.

## **7. Personal Information Rights**

Individuals have rights in relation to the information the Council holds about them, including the right to request a copy of their information. You can find out more about your [Personal Information Rights](#) on our website or by contacting the Council's Information Governance team at the address below.

## **8. Data Protection Officer**

The Council has a Data Protection Officer who you can contact in the first instance if you have any questions or complaints about how we are processing your personal information.

Please contact; Data Protection Officer, 2 High Street, Perth, PH1 5PH,  
[DataProtection@pkc.gov.uk](mailto:DataProtection@pkc.gov.uk), 01738 475444.

## **9. Information Commissioner's Office**

If you want to complain about how the Council has processed your information you have the right to contact the Information Commissioner's Office (<https://ico.org.uk/> 0303 123 1113).

## **10. Information Governance Team**

If you have any questions about how the Council processes your information, or if you would like a copy of this notice in another language or format, please contact the Information Governance team;

Information Governance

Legal and Governance Services

2 High Street

Perth

PH1 5PH

Email: [DataProtection@pkc.gov.uk](mailto:DataProtection@pkc.gov.uk)

Telephone:01738 477933