

CPSMA Guidance Note in relation to School Meals during the COVID-19 Crisis.

2nd April 2020

- The Department of Education and Skills (DES) has issued an updated guidance document (dated 29th March 2020) following on from the Taoiseach's announcement of 27th March 2020. Please see the **Latest News** section of our website [here](#) for further details.
- It is important to note that that this initiative is school led. It is not necessarily intended that every child who receives school meals continues to receive these during this period. The purpose of this initiative is to ensure that pupils most in need continue to access food provision. It may be prudent to check with your families to see if they would like to avail of these provisions.
- With the latest public health measures in mind, schools are requested, by the DES, to make arrangements for the distribution of non-perishable food packages.
- The DES is mindful that schools may have preparations made for the facilitation of distribution of food to pupils' homes with the support of the Tusla Education Support Service, (TESS), HSCL co-ordinators, School Completion staff or local community assistance, and these arrangements can continue, if still feasible.
- Delivery via An Post can be put in place where local arrangements for distribution are not in place or no longer feasible.
 - An Post has agreed to facilitate the carriage of non-perishable food packages from their Delivery Services Units to pupils' home addresses.
 - Food packages for delivery should be non-perishable goods, weighing not more than 30kg and be securely wrapped.
 - Schools should not share pupils' addresses with An Post. Food packages will need to be addressed by the school and will then need to be delivered by the school to the An Post Delivery Service Unit (DSU), for delivery to the pupil's home address by An Post. A list of the designated units nationwide is available [here](#).
 - Packages will travel through the An Post network to pupils' home addresses on a FREEPOST basis.
 - Schools should contact their local An Post DSU to put local arrangements in place.

- Alternatively, the DES has highlighted local Community Support Network Programmes that are available to assist with volunteer efforts. If schools experience difficulty identifying or getting in contact with a local volunteer organisation, contact can be made with the local Community Champion whose role is to direct queries and requests for assistance to local community and voluntary groups. A list of Community Champions who may be able to assist schools in this regard is available [here](#).
- Schools may also consider pooling staff resources between schools to assist in the operational aspects of ensuring that school meals continue to be delivered.
- If you are unable to use your current provider to continue offering school meals, schools have autonomy to consider other options, such as using local community initiatives or a local charity that provides food or meals. Schools may also consider alternative providers or retailers.
- Schools must be mindful of data protection obligations and the need for a legal basis to share personal data such as names and contact details with third party groups such as lunch providers, local delivery companies, or volunteer groups.

The proposed school meals delivery will involve processing a large volume of children's personal data (and may include health data where there are dietary requirements e.g. coeliac). We would therefore strongly advise that a Data Protection Impact Assessment (DPIA) be carried out prior to such processing activity commencing. This will identify possible data protection issues and possible mitigating factors. It is likely that the legal basis for this processing is on the public interest and/or public health bases, as provided in the GDPR and Irish Data Protection Act 2018, but it is for each school (controller) to make this assessment. As with all such processing, schools must ensure that suitable safeguards are implemented. Such safeguards may include limitations on access to the personal data on a strict need to know basis, strict time limits for its erasure once this emergency period has passed, ensuring only the minimal amount of personal data needed to achieve this purpose is processed and other measures such as adequate staff training to protect the data protection rights of the children and those in their households.

The DES guidance states that the school must address the packages itself for delivery by An Post. Where a school is considering requesting a third party to do the addressing of the packages e.g. print labels, label and distribute the packages, on its behalf the contract with

such third party will need to be amended to reflect this processing activity (i.e. a data processor clause will need to be included).

Schools must also be transparent regarding the measures they implement in this context. They must provide the relevant individuals with information regarding the processing of their personal data in a format that is concise, easily accessible, easy to understand and in clear and plain language. This may be communicated to the individuals via text message/email notifying them of the proposed processing and providing them with an opportunity to opt-out.

- Schools are advised that where school meals provision is in operation that this is considered an essential service and school staff or volunteers travelling to assist are included in those considered to be travelling for work purposes. Staff who are required to travel to co-ordinate the scheme should have a letter to that effect on headed school paper, along with another form of identification, both of which should be available for inspection by the Gardaí.
- Schools should put arrangements in place to ensure that the provision of food parcels is arranged no more than once per week.
- CPSMA wish to acknowledge the hard work and dedication of principals and staff who are continuing to facilitate such initiatives at short notice under difficult circumstances. We recognise their flexibility and adaptive qualities which are so apparent in these rapidly changing and unprecedented times.

Our advisors are available for support and guidance on (01) 6292462 or info@cpsma.ie.

The Social Inclusion Unit is contactable at social_inclusion@education.gov.ie