

## Action Plan

### Action Point 1 - Security of personal data

ECS services are to be highly commended for ensuring continuing support to clients – families and young learners throughout the changes during the Covid19 emergency response in 2020-21.

The need to create new accounts quickly for new clients at the beginning of the pandemic lockdown was met swiftly by implementing new processes to capture essential data needed to make ECS payments as officers moved to digital and online working in March 2020. The Service quickly introduced new procedures for collating details required to ensure support of all young learners eligible during March and April 2020. This was an exceptionally difficult time for administrators to manage while moving to home-working.

The Council's Register of Processing Activities includes an entry for the processing of personal data of young people towards providing a free school meals service. However, evidence of a Data Protection Impact Assessment has not been found.

Audit Scotland refers to Covid19 effect on public services, the need for rapid change and adaption to new circumstances and governance. The public spending watchdog offers resources for managing solutions for Covid19 since 2020 <sup>1</sup> and plans more guidance to support moves beyond the response phase of the pandemic into recovery and renewal.

### Management Action Plan

Either a pre-data protection impact assessment checklist or a data protection impact self - assessment of processes managing personal data for ECS free school meals payments is carried out to comply with the Council's Data Protection Policy.

Risk/Importance:	Medium
Responsible Officer:	Service Manager (Business Services), ECS - Business and Resource Services
Lead Service:	ECS Business Services
Date for Completion (Month / Year):	Completed

<sup>1</sup> Audit Scotland resources at <https://www.audit-scotland.gov.uk/covid-19>

Required Evidence of Completion:	Confirmation received that the pre data protection impact assessment checklist has been signed off and confirming a full data protection impact assessment is not required.
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#### Auditor's Comments

Satisfactory
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