

Pre screen

DPIA (Data Privacy Impact Assessment) Pre-

Screen. It will be published on our Open Data Portal so please avoid jargon, explain acronyms the first usage, and complete all sections to a good standard. Names below head of service will be redacted, and if you have concerns about specific information being published talk to your IRO but note our obligations of telling people what we will do with their data so redaction will not be the norm.

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Data Protection Advice Team's Ref (DP24_xxx)	DP25_280
Project Name	PLINTH Booking System for Camden Holiday Activity and Food Programme
Directorate and Service	Adults and Health, Childrens Commissioning
Pre-Assessment Completed By	Henry Purkis
Project Go Live Date (anticipated/planned)	1 st June 2025

Description of the Project: what is your project doing in non-technical terms?

Camden Council is introducing new software (PLINTH) for parents/carers to book spaces online for their children to access the Camden Holiday Activities and Food (HAF) programme. The software will improve how parents book free holiday activities for their children.

The HAF programme supports Camden children aged 5-16 who are eligible for free school meals or otherwise vulnerable. Children can access free positive activities across the Borough (e.g. sports, arts, play etc.) during Easter, Summer and Winter school holidays and are provided with healthy meals as part of the offer.

The programme is commissioned by Camden Council, with the Young Camden Foundation (YCF) as the main delivery partner. The Young Camden Foundation manage programme delivery and administer grant-giving to local organisations who provide the activities to children/families.

Parents/carers can use an online booking system to view the range of different activities available and choose appropriate provision for their child to attend.

The software system that is currently being used for HAF online bookings doesn't have functionality to check the eligibility of families for the programme at the point of registration, which may mean that resources are not being prioritised for those who need it most. It is planned to change the software being used to a version which has the

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functionality to check the eligibility of families at the point of registration for online booking of HAF activities.

A key improvement with the new PLINTH system is the ability to automatically check a child's eligibility during registration. Eligibility criteria include:

- The child is aged between 5 and 16,
- They are a Camden resident,
- They are eligible for benefit-related Free School Meals (FSM).

In order for the software to be able to check family eligibility, Camden will securely share a limited amount of relevant data from the school census before each HAF holiday programme. Information Asset Owner authorisation will be obtained prior to data-sharing and only data of families in receipt of benefits-related free school meals who are eligible to access the HAF programme will be securely shared.

The system will automatically cross-check information parents provide at registration (child's name, date of birth) to confirm eligibility against a list of eligible families extracted from school census data. This will ensure that available places are only allocated to eligible families, and provision is prioritised to families who need it most.

Parents will be required to input certain information when registering an account on PLINTH, including:

- Child's first name, surname, date of birth, address, and school,
- Child's health details, including any medical needs, dietary requirements, medications, and EHCP (Education, Health and Care Plan) information,
- Parent/carer's name, address, contact number, and emergency contact details.
- Additional information such as main language spoken by parent and child, interpreter requirements, religion or faith, and whether the child has a caring responsibility (e.g. is a young carer)

Providers will input data into the system on behalf of parents who are unable or choose not to use the Plinth system to book a HAF space, in order to avoid any barriers to access for vulnerable families.

Authorised YCF staff and Camden's HAF Commissioning Manager will have administration privileges and have access to data inputted by providers and parents for the purposes of oversight of the booking process, monitoring attendance and production of reports for the Department for Education's grant requirements.

Each HAF provider will receive their own unique username and password to access their individual account. Through their account, providers will be able to:

- Input details of their programmes
- View information regarding the support needs of children who will be in their care and parent/carer information
- View contact details to communicate with parents
- Mark daily registers
- Complete post-programme reports

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- Send communications to the parents registered with them
- Input data on behalf of families who are unable or choose not to use the online system

Providers will not have access to other providers' accounts, or the details of parents registered with other providers.

PLINTH is already in use within the Council for other services and has passed Information Security internal governance. Information Security are liaising with PLINTH to create a new secure environment solely for this purpose and have appointed a delivery team to ensure project implementation is compliant with all data protection, privacy and information security requirements.

<p>Whose Personal data or Special Category Data are you using e.g., children, vulnerable adults, residents, users of a service, employees</p>	<p>Children and young people aged 5-16 and their parents/carers who are eligible for benefits-related FSM or otherwise vulnerable.</p>
<p>List the Personal Data (eg names, addresses, MOSAIC refs) and Special Category Data (race /religion/sexuality/health etc) and Criminal Offence Data (includes allegations of offences not just convictions) being used</p>	<ul style="list-style-type: none"> • Personal data: First name and surname, date of birth, age, sex, address including post code, school attended, parent/carer contact details (telephone number, email), emergency contact details • Special category data: Ethnicity, benefits-related FSM eligibility data, Health information (medical needs, dietary requirements, medications), Education, Health and Care Plans (EHCPs), details of SEND, details of other eligibility criteria due to vulnerability (e.g. whether the child has a social worker or is looked-after, Refugee/Asylum seeker status), The child have any caring responsibilities (Young Carer) , Religion/Faith, Main language spoken by child and parent, Interpreter need. <p>Drop-down options will be provided by Camden.</p>
<p>Why are you collecting this data and what will you do with it? Give details.</p>	<p>The system will be used by HAF providers (25+ VCS organisations) to create activity profiles for parents/carers to book.</p> <p>Parents/carers using HAF (approx. 2000 families) will be able to register accounts on the software and book appropriate holiday activities for their children.</p>

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	<p>Administrative privileges will be held by authorised staff of the Young Camden Foundation and Camden's HAF Commissioning Manager.</p> <p>Data will be retained for 3 years from the date of parent registration with the software.</p> <p>The Privacy Notice will be available on the Young Camden Foundation web page for the HAF booking system.</p> <p>The data is being collected to support the delivery, management, and safeguarding of Camden's Holiday Activities and Food (HAF) programme.</p> <p>Specifically:</p> <ol style="list-style-type: none"> 1. To confirm eligibility for the HAF programme: Children's names and dates of birth inputted at parent registration are automatically cross-checked by the system against their eligibility for benefits-related Free School Meals (FSM) using limited date provided from the school census. The school census data provided is checked by Camden officers for accuracy. In instances where the software is unable to match data automatically, manual eligibility checks by YCF staff will be carried out. This will ensure that limited programme places are prioritised for eligible children who need the service most. AI is not used in the automatic eligibility checking process. Information Asset Owner authorisation will be obtained prior to data-sharing and only data of families in receipt of benefits-related free school meals who are eligible to access the HAF programme will be securely shared. 2. To ensure the safety and wellbeing of participating children: Providers collect health information, including medical needs, dietary requirements, medications, and SEND details. They will use this information to make appropriate arrangements for each child's care and support needs. The inclusion of language, religion/faith, and caring responsibilities helps to ensure that providers can make culturally
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	<p>sensitive arrangements and understand wider family contexts. For example, knowing if a child is a young carer or has a particular faith may influence session planning or support needs. Language fields will support interpreter bookings to improve communication access.</p> <p>3. To communicate with parents/carers and manage bookings: Providers use parent/carer names, addresses, contact details, and emergency contacts to confirm parent bookings, discuss any special arrangements for SEND needs children, contact them in case of emergencies or issues, send relevant information and updates about their HAF programmes and signpost parents to all other Camden opportunities. Language fields will support interpreter bookings to improve communication access.</p> <p>4. For administrative and reporting purposes: Authorised YCF staff and Camden HAF commissioning manager will access the data to monitor attendance, manage programme delivery and for DfE post-programme reporting requirements. Equity monitoring will also be carried out using anonymised data (e.g. sex, ethnicity, disability, refugee/asylum status) to help identify access barriers, ensure fair representation across all demographic groups, and inform improvements to make the programme more inclusive.</p> <p>There is limited use of AI by the PLINTH system to help providers set up activity profiles, however this does not involve the processing of personal data. For example, if a provider types in "Football on a Tuesday at 10am", the system will automatically set up a page with a description for a football activity on a Tuesday at 10am. This is then reviewed by the provider who can make changes to ensure accuracy. AI is also used for adding filters to reports for example, if a provider or coordinator asks a question like, "how many children did we help last week" it automatically applies the correct filters so providers can see the answers.</p>
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<p>Is there a piece of law that says you must, should, or may do this? If yes, set it out. If there's no such law explain the basis for doing this processing – consent or something else?</p>	<p>For personal data the legal basis is UK GDPR article 6 (1)(c) legal duty and 6(1)(e) public task and 9(2)(g) public task with the Data Protection Act 2018 Schedule 1 Part 2 condition being para 6 governmental purposes and the underlying law being the Localism Act 2011, childcare Act 2006, Children Act 1989, Equality Act 2010 and Food Information Regulations 2014</p> <p>The Camden HAF programme is delivered as part of the Department for Education's (DfE) Holiday Activities and Food Programme (HAF), which is a central government-funded initiative. The DfE requires local authorities to deliver programmes specifically for children eligible for benefit-related Free School Meals (FSM) or otherwise vulnerable.</p> <ol style="list-style-type: none"> 1. Childcare Act 2006, Section 6: Camden Council has a duty to make sure there is enough childcare available for working parents, including during school holidays. The HAF programme helps meet this duty. 2. Children Act 1989, under statute 17: The Council has a legal responsibility to safeguard all children in need and looked after children. Collecting key information helps keep children safe during the programme. 3. Equality Act 2010: The Council must make sure that children with disabilities or special educational needs (SEND) are treated fairly and not discriminated against. Reasonable adjustments must be made, which is why details of SEND and medical needs are required. 4. Food Information Regulations 2014 (Natasha's Law): Camden must make sure all food provided in the HAF programme meets food safety rules, including giving information about allergens. We collect dietary information to comply with this law.
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	<p>5. UK GDPR and Data Protection Act 2018:</p> <p>We follow all data protection laws. Personal data is collected and used:</p> <ul style="list-style-type: none"> • To deliver a public service • To protect children's health and safety • Receive parents' consent for sensitive information like medical needs <p>Emergencies:</p> <p>We will process personal data for the following reasons:</p> <ul style="list-style-type: none"> • Public Duty: The data processing is necessary to deliver Camden Council's HAF programme, which supports the welfare of children and young people from low-income families. • Consent: Parents or carers will be asked to give clear consent to share details about their child's health, dietary needs, and EHCP plans when registering. • Public Interest (Sensitive Information): Sensitive information such as health details and EHCP plans will be collected to keep children safe, healthy, and well-supported, in line with the Data Protection Act 2018. • Emergency Situations: In emergencies, personal data may be shared if necessary to protect a child's health or safety (for example, sharing medical information with relevant staff).
<p>Are you using a new system or new IT kit? If so, what is it and have you cleared the security side with the Information Security Team?</p>	<p>PLINTH, has been in use at Camden for several years. It is a SaaS application that Camden uses primarily to manage referrals between citizens and external organisations, as well as a limited amount of simple grant management.</p> <p>PLINTH has undergone the CTDS SCA assessment and is approved for use in Camden by InfoSec.</p>

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If you are using a contractor name them, and are you going through procurement? If so, please tell us the procurement contact.	PLINTH is the software provider. As PLINTH already holds a contract with LB Camden, it is being determined whether the existing contract will be varied or a new standalone contract created. A procurement process is not required.
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Risk Assessment. In assessing risk we need to consider the nature, scope, context and purposes of the processing, and carry out an assessment of the impact of the proposed processing on the protection of personal data. **These are questions to help you and us assess the risk levels**, so it is essential that this table is completed accurately. **If you answer Yes or Unsure, please add detail to the Risk Explanation Table that follows this table.**

	Risk Type	Yes/No/ Unsure
1	<p>Will you use profiling or automated decision-making eg AI (where computers do the thinking and a human isn't involved at all) to make significant decisions about people (eg to help make decisions on someone's access to a service, opportunity or benefit?) or on a large scale (like a large area of the borough)?</p>	<p>Yes – PLINTH will automatically check eligibility of children and young people for the HAF programme against data provided from the school census. However this automatic checking does not involve the use of AI.</p>
2	<p>Will you use special category data (race/religion/sexuality/health etc) to help make decisions on someone's access to a service, opportunity or benefit?) or on a large scale (like a large area of the borough) or for a lot of vulnerable people?</p>	<p>Yes - eligibility for benefits-related free school meals will be used to make decisions on families access to HAF provision. Special category data (e.g. Health and SEND information, religion/faith, and ethnicity) will be used by providers to determine children's support needs and whether provision is suitable to meet those needs.</p> <p>This data helps ensure that children's medical needs are met, reasonable adjustments are made, and provision is delivered in a culturally sensitive and safe way. While this information does not affect whether a family can access the service, it is essential for</p>

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		<p>safeguarding, wellbeing, and equity once they are enrolled.</p> <p>Other demographic data such as sex and age will also be collected to support equality monitoring and ensure that children of different genders and age groups have equitable access to the programme. This supports Camden's obligations under the Equality Act 2010 to monitor participation across protected groups and address any access gaps.</p>
3	Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system?	No
4	Is the project using new technologies? Like face recognition software or a system we don't currently use?	No - PLINTH is already in use within the Council for other services and has passed Information Security internal governance. However, the use of PLINTH software for the purposes of the HAF programme is new.
5	Will you be using criminal offence data (this includes allegations of offences not just convictions)?	No
6	Will you process biometric (fingerprint /facial recognition) or genetic data?	No
7	Will data be combined, compared or matched from multiple sources?	Yes - Child benefits-related FSM eligibility data from the school census is cross-checked with registration details provided by the parent

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		or data inputted by the provider on the families behalf.
8	Will personal data be processed without providing a privacy notice directly to the individual? In other words, will this processing be kept secret?	No - Privacy notices will be provided to parents/carers at registration and consent obtained.
9	Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour?	No
10	Will children's personal data be processed for profiling or automated decision-making or for marketing purposes, or offering online services directly to them?	Yes – PLINTH will automatically check eligibility of children and young people for the HAF programme against data provided from the school census, in order to allow families to book free HAF provision online. However this automatic checking will not be used for marketing or sales purposes.
11	Will any of the data be processed (this includes being stored and accessed by sub-contractors or IT support) outside the UK and outside the EU?	No - We will obtain a confirmation from IT/PLINTH, to ensure data will stay within UK only.
12	Will personal data be processed which could result in a risk of physical harm in case of a security breach?	No

Risk Explanation: If you marked any risks above as **Yes** or **Unsure** please complete the table below so we can assess if a full DPIA is needed. Explain what you are doing, what risks you think there are and how you will deal with those. This will help us assess the data protection risk level. **You don't have to remove all risks- just reduce them to an acceptable level.**

Risk Number	Explanation
1	Plinth will cross-check parental information provided at registration with school census data. This does not involve the use of AI. Where there are mismatches, manual checks will be carried out by YCF staff.
2	We will collect special category data (e.g. health information, dietary needs, SEND status, religion/faith, and caring responsibilities) to ensure the safety and wellbeing of children attending the HAF programme. The data is required to be shared so the provider can ensure they can meet the support needs of the child in their care.

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7	There will be matching of data between the school census and data entered by parents at registration. The risk of errors in the census data is mitigated by this data being checked by officers, and any mismatches with data entered by parents will be manually checked by YCF staff.
10	Although data will be used for automatic decision-making as outlined above, this will not be used for marketing or sales purposes.

Ethical Assessment. In assessing ethics you need to consider the benefits, proportionate use, possible biases and transparency of the impact of the proposed processing and analysis of personal data on individuals and groups. It is the responsibility of the Project Manager and Sponsor to assess the potential ethical impacts that the intended processing may pose. (These answers can be reused for questions dealing with the same issues in the Full DPIA if the outcome of this pre-screen requires you to do one) Please see our Data Charter page for more information on ethical use of data in Camden <https://www.camden.gov.uk/data-charter>

1. Effects on Residents

a) How does use of this data benefit our residents? (Is there evidence of this approach being likely to meet a public need?)

The use of this data directly benefits Camden residents by ensuring that limited places in the Holiday Activities and Food (HAF) programme are allocated fairly and to those most in need. By confirming eligibility based on Free School Meals (FSM) status, age, and Camden residency, we ensure that vulnerable families and children receive access to free activities, childcare, and nutritious meals during school holidays.

Evidence shows that holiday hunger and lack of affordable childcare disproportionately affect low-income families, and the DfE HAF programme was created to meet these children and families need. Collecting relevant data allows providers to deliver a safer, more inclusive, and personalised service. This includes identifying children's health needs, special educational needs and disabilities (SEND), language preferences (to arrange interpreters if needed), caring responsibilities (e.g. young carers), and religious requirements.

In addition, collecting demographic data such as sex and age supports equality monitoring, helping Camden ensure that children of all genders and ages are accessing the programme fairly and equitably.

These additional fields help ensure children are supported appropriately, and that services are culturally sensitive, accessible, and equitable contributing to a more positive experience for both children and families.

b) What would be the harm in not processing this data?

If we do not process this data:

- Children in low-income families may miss out on essential services like free meals and structured activities.
- Resources could be misallocated, with places taken by those not eligible, leaving vulnerable children without support.
- Safeguarding risks could increase if providers do not have access to children's health or dietary information.

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- Providers may not have the opportunity to learn about children with SEND needs before the programme starts, which can make it difficult to accommodate their needs, such as arranging a 1:1 staff member.
- The Council could fail in its statutory duty under the Childcare Act 2006 and safeguarding responsibilities.
- Failure to collect key inclusion data such as language needs, faith observance, or caring responsibilities could result in children not receiving culturally or contextually appropriate support, undermining the accessibility and equity of the programme.
- Without demographic data such as sex, age, ethnicity, or refugee/asylum status, the Council may not be able to monitor who is accessing the programme, identify participation gaps, or ensure compliance with its duties under the Equality Act 2010.

2. Data Bias

a) How do you plan to identify errors and biases in data collection, analysis and algorithms? Once errors and biases have been identified in data collections, how will they be taken into account for any future policy or service which uses this work as an evidence base?

- The FSM eligibility list is generated from Camden's census data which is checked by officers.
- We will re-upload the list after every school census to ensure data are up to date.
- System checks (built into PLINTH) will flag incomplete or incorrect entries. For example: DOB, full name, post code etc will be mandatory fields.
- Where there are mismatches between data entered at registration and the FSM eligibility list, manual checks will be carried out by YCF staff.
- For self-reported fields (e.g. language, religion, caring responsibilities), drop-down menus will be used to reduce variation.
- Demographic data such as sex, ethnicity, age, and refugee/asylum status will support equality monitoring and allow us to identify potential underrepresentation or access barriers across specific groups.
- Feedback from providers will be used to flag where support needs may not align with submitted data, prompting review.

Future policy decisions or services using this data will consider any identified errors by:

- Reviewing data collection practices,
- Updating eligibility checks where needed,
- Consulting stakeholders, including parents and providers, for feedback.

b) Who could be negatively affected by processing this data? (How can you show there is a **fair balance** between the **rights of individuals** and the **interests of the community**?)

Children and families may be negatively affected in a few ways:

- Data inaccuracies could incorrectly exclude eligible families if, for example, details do not match at registration.
- Families who experience language barriers or who are not confident with digital systems may struggle to complete the registration process, which could prevent them from securing a place.
- Strict eligibility checks may prevent non-eligible families from accessing a place, but this is necessary to ensure limited resources are directed to those most in need.
- Not capturing language, religion, or caring status may inadvertently create barriers or result in support gaps for children with distinct cultural or familial needs.

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- Failure to monitor access by sex, age, ethnicity, or refugee status could lead to underrepresentation or inequitable outcomes for some groups, which may go unnoticed without demographic oversight.

To minimise negative impacts:

- Clear privacy notices and consent processes will be provided, with information available in plain language and alternative formats where possible.
- Support will be offered to parents/carers who need help with registration, particularly those facing digital exclusion or language barriers.
- A clear review and appeals process will be in place to allow families to query, correct, or update their information.
- Drop-down menus will be used for certain fields (e.g., religion, language) to improve data accuracy and consistency.
- Guidance materials and good practice tips will be shared with providers to help them respond appropriately to children's language needs, religious observances, and caring responsibilities.
- Demographic data (such as sex, age, ethnicity, and refugee/asylum status) will be reviewed regularly to identify participation gaps and inform efforts to improve equitable access across communities.

Overall, the rights of individuals are carefully balanced with the wider community interest. The processing is necessary to ensure fair access to the programme and to prevent misuse (i.e., preventing non-eligible families from booking limited places). Strict data protection controls limited and proportionate data collection, and transparency about how personal data is used help maintain this balance.

3. Limitations of Data

a) How will you make sure that you only process the data that is necessary and proportionate for the purpose of the project, and no more than is necessary?

We are only collecting essential data:

- For eligibility (name, DOB, FSM status),
- For safeguarding and inclusion (health, medical, dietary needs, language spoken, religious requirements, caring responsibilities (e.g. young carers), and any additional support needs),
- For communication (parent/carer contact details), language needs (including whether an interpreter is required)
- For equality monitoring: sex, age, ethnicity, disability, and refugee/asylum status, these are collected solely to help the Council monitor access and ensure the programme is reaching all groups fairly and equitably

No unnecessary or excessive data is collected. Regular reviews ensure the data collected remains proportionate to the programme's objectives.

b) How are you ensuring the data used is reliable? (**Data quality**)

- Eligibility data (FSM status) is sourced from Camden Council's census data, which is checked by officers for accuracy.
- Parents input their own child and contact details directly into the PLINTH system, reducing risks of manual entry errors.

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- Automated checks within the system crossmatch parent-provided data with the uploaded eligibility list to confirm accuracy.
- For self-reported fields such as language spoken, religion, and caring responsibilities, drop-down options are used to standardise responses and minimise variation or ambiguity.
- Standardised options are also used for demographic fields such as sex, ethnicity, disability, and refugee/asylum status to support accurate equality monitoring.
- The system enforces mandatory fields and input validation to prevent incomplete or incorrect submissions.

What processes do you have in place to ensure maintenance of data accuracy? (**Data integrity**)

- Census data is checked by officers, manual checks by YCF staff will be undertaken where there are mismatches.
- Data will be uploaded three times a year to minimise data becoming out of date
- Privacy notices inform parents/carers how to correct or update their information if needed.
- Providers are only given access to data for the children registered with them, reducing unnecessary handling of data.
- Drop-down lists are used for fields such as language spoken, religion, and caring responsibilities, sex, ethnicity, disability, and refugee/asylum status to reduce data entry errors and improve consistency.
- Parents/carers can log back into the system to review and edit their information if circumstances change.
- System validation rules ensure key fields (e.g. name, DOB, contact details) are completed correctly before submission.

i) How have you clearly marked origins and destinations of data used to trace source of errors? (**Data lineage**) (Are all metadata and field names clearly understood)

All data sources are clearly documented:

- FSM eligibility data comes from Camden's Admissions and Education Commissioning teams.
- Parent/child registration data is inputted by parents/carers via the PLINTH system.
- Field names (e.g., name, date of birth, school, dietary needs, language spoken, religion, caring responsibilities, sex, age, ethnicity, disability, refugee/asylum status) are standardised and clearly defined.
- The system keeps a clear audit trail, allowing errors to be traced back to either parent input or FSM records.
- Dropdown options are managed centrally to ensure consistency in data entry, reporting, and interpretation.

c) How could the objectives of this project be completed without processing the data?

The objectives of the project cannot be effectively completed without processing this data. Eligibility checks, safeguarding measures, and communication with families all rely on collecting accurate personal and health data. Without processing this data:

- We would not be able to confirm if a child is eligible for a funded HAF place.

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- Providers would not have the essential health, dietary, or SEND information, language preferences, religious considerations, or caring responsibilities to ensure children's safety.
- Parents could not be contacted in emergencies or receive booking information.
- We would not be able to monitor uptake across key demographic groups (e.g. sex, ethnicity, disability, refugee/asylum status), which limits our ability to assess reach, identify access barriers, and improve equity.

Therefore, processing this data is essential to deliver the HAF programme fairly, safely, and in compliance with Camden's statutory duties around childcare, safeguarding, equality, and inclusive access.

Please check you have completed all sections, and then send a copy of this screening questionnaire to the Data Protection Advice Team at dpa@camden.gov.uk on a OneDrive link with edit rights. If you are already dealing with someone in DPAT please send it back to them on a OneDrive link with edit rights.

Please check you have downloaded this form to your OneDrive- do not complete it on this link or you will overwrite the template!

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For Data Protection Advice Team to Complete:

Project Name and Our Ref	PLINTH Booking System for Camden Holiday Activity and Food Programme DP25_280
WHAT IS THE LEVEL OF RISK ?	LOW
REASONS FOR THIS LEVEL	The data usage as part of this project will be in accordance with its purpose for the Holiday Activity and Food programme. Data will be held on the Plinth system and will be held in accordance with the retention schedule. Data security for plinth has been cleared for usage within the council however for this DPIA I have provisionally cleared this DPIA subject to information Security clearing Plinth for this project. IAO has given consent for data usage as part of this project.
IS A FULL DPIA NEEDED?	NO
Date cleared by DPAT	23/04/2025 (Revised 05/06/2025)
Cleared by	Tanya Bryant