EasyPeasy Data Protection Impact Assessment

Step 1: The need for a DPIA

In this section, we explain broadly what we aim to achieve with EasyPeasy and what type of processing it involves.

EasyPeasy is an app-based programme for parents & carers of children from 0-5 that improves the Home Learning Environment and is proven to close early gaps in child development. It is backed by rigorous independent evaluation. The programme can be delivered by Local Authorities as an early intervention strategy, a universal or a targeted-selected programme e.g. for low-income families. It is primarily delivered in the home of the family and used independently, but can also be integrated into early years settings and used by practitioners.

This DPIA is designed to help you understand how and why we process data and to provide details about our data protection systems.

We collect and process personal data from registered users of the EasyPeasy app, as well as practitioners who sign up for our Practitioner Training sessions. Our activities include monitoring of user data, and in some cases, it also involves the processing of 'special-category' data (i.e. ethnicity) and data concerning vulnerable data subjects (i.e. children's first names and dates of birth). In some cases, we also combine data from multiple sources (i.e. matching user postcodes to LSOA areas from the ONS Income Deprivation Affecting Children Index).

EasyPeasy is available directly to individual users, as well as through partnerships with organisations where the full & free version of the app is made available to specific communities. In the case of the latter, we also process user data to make decisions about eligibility for access to the full & free EasyPeasy offer (i.e. only users with postcodes within a local area may be eligible to access a locally supported EasyPeasy offer).

The reasons that we process user data are to ensure that we can deliver the service to our users, and that we can personalise and localise the service to improve its relevance and impact for our users, as well as ensuring that we are supporting equal opportunities. We process data on the bases of explicit consent, legitimate interests, and contractual necessity.

Step 2: Description of the processing

Nature of the processing

In this section, we set out how we collect, use, store and delete data. We identify the sources of data we collect, who it is shared with, and cover any data processing that is 'high risk'.

How we collect data/sources of data

We collect data in the following ways:
- Direct interactions with users e.g. when users create an account or contact us with a question or issue.
- Using automated technologies e.g. cookies or similar technologies when visitors use the website and the app.
- From third parties e.g. from our third-party analytics provider.

How we use data

The main use of data is to allow account creation and to provide a personalised experience based on a user's interests and the age of their child. We also provide an email newsletter for our users. All email newsletters have an unsubscribe link and all opt-outs are actioned and respected. We do not carry out any behavioural advertising.

We use data for the following purposes:

- To register users who choose to create an account with us.
- To manage our relationship with customers (e.g. responding to questions, complaints, asking users to take a survey).
- To administer and protect our business, website and app (e.g. system maintenance and support, fixing problems, hosting of data).
- To deliver app content and measure and understand the engagement rates.
- To carry out data analytics to improve our app, products, marketing and customer experience in our app.
- To provide email newsletters to users who have subscribed to this service.
- To verify user identity and provide a secure platform.
- To comply with regulatory or legal obligations.
- To enable users to create/edit/delete content and comments.
- To enable users to like and favourite content.
- To enable users to report content and comments that they feel are inappropriate.
- To enable users to block other users.
- To enable users to share content on social media sites.

Cookies

Our website uses cookies for a range of functions outlined below.

- Account authentication
- Cookie consent
- Usage analytics

We have put in place a cookie consent tool which explains the cookies we use and requests consent to these. We also have a cookie policy which explains in more detail the types of cookies we use and the purposes we use them for. The consent tool is available at the point of website entry.

Storage and deletion

User data is stored in Amazon Web Services in the eu-west-2 region, which is in the London, UK area.

User Generated Content (UGC) can include images and GIFs that are stored with a third-party Content Delivery Network (CDN).

Some pseudonymised analytics data is stored in the USA.

Data sharing

Data is shared for routine data processing necessary to deliver the service.

Our hosting provider (Amazon Web Services) provides the infrastructure we use to keep all of our user data. They have no direct access to the data stored.

We make use of a recommender system provided by a third party. The provider acts as our processor and all user data that they process is pseudonymised.

We make use of third party analytics providers to measure user interactions with our website and app. This is so that we can check the quality and effectiveness of our service and ensure it meets the needs of the user. Our analytics providers use cookies and similar technologies to collect information about user interactions. This includes data about the user's device or browser, their on-site activities, and a portion of the user IP address. The providers act as processors and all user data that they process is pseudonymised. These reports don't identify the users - they are aggregated information about all our users.

Our analytics providers don't use any of this information for their own purposes - they act as our processor and only operate on our instructions. This processing is carried out in the EU.

We use a third party notification service to provide users with notifications on their device. To make use of this service, certain personal data is transferred to the provider (e.g. 'Hi, Jane'). This processing is explained in our privacy notice.

As part of our partnerships with organisations, we prepare usage reports that aggregate relevant user data for analysis. No PII is shared in these reports.

We use a third party tool for conducting surveys. This provider acts as our processor and does not have access to the answers users give during this optional questionnaire. The survey results are aggregated to help us understand the impact our service is having on building parents' and carers' confidence and knowledge of child development, as well as on improving the home learning environment. We also collect some basic demographic data in this survey which is designed to help us monitor and ensure equality and diversity.

Profiling

We perform profiling on users to show the most useful parenting advice to each user. This is done by asking which topics the user is interested in, the date of birth of their child, and by tracking the content the user views. We then recommend similar content that is age-appropriate for the user's child. The child's date of birth is never shared or processed with third parties.

We operate a moderation system to ensure that no harmful or offensive content is created, shared, or viewed on the platform. It includes a set of Community Guidelines that all users must agree to and adhere to, reviews of all newly published content by our Moderation Team, and a reporting system that allows any user to flag a potentially inappropriate piece of content to our Moderation Team.

Advertising

We do not allow advertising on our website or app.

Security measures

We use the following security measures for our infrastructure:

- We use a market-leading third party to handle user logins, we have no access to passwords.
- We use HTTPS for all network connections.
- We use a Captcha function on our "contact us" page.
- We use a market-leading, reputable web hosting company.
- We have a policy of regularly deleting any files, databases, or applications from our app and website that are no longer in use.
- We follow the least privilege access principle.
- All data is regularly backed up.
- We run regular web security scans to check for website and server vulnerabilities.
- All user data is encrypted.

Scope of processing

In this section, we cover the scope of our data processing including the nature of the data, and any special categories of data that we process. We specify the quantities of data that we collect and use, set out how long we keep it, and how many individuals are affected across what geographical regions.

Data processed

Identity data: name, username.
Contact data: email address.
Location data: postcode.
Technical data: IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.
Profile data: user preferences, interests, feedback, and questions as collected through survey responses.
Usage data: information about how users use our website, app, and services.
Marketing and communications data: a record of users' preferences in receiving marketing from us.

Special categories of personal data

We collect some special category personal data.

- We ask our users to fill in an optional survey about their experience using our app and the perceived impact it has on their relationship with their child and home environment. As part of this survey, we also ask for some basic demographic information about the user, including their ethnicity. As part of our partnership, we will share the aggregated data from this survey to help ensure equality and diversity. This data is not currently shared at a person level.
- We require a user's child's date of birth in order to show age-appropriate content. This data is not currently shared at a person level.

Volume of personal data

The volume of personal data to be processed could reasonably grow to be in the millions.

Retention of data

We have a retention schedule which specifies storage periods for categories of data which reflect relevant legal requirements and limitation periods applicable to contractual claims. Once retention periods have expired we securely delete data.

Geographical area

The data subjects whose data we process are located in countries around the world where we operate and where the EasyPeasy app is available on the App and Play Stores. The app and all personal data is hosted in the UK.

Context for processing

In this section, we describe the context for processing the data including the nature of our relationship with our users, how much control they have, their expectations for how we process their data, including with reference to children and other vulnerable groups.

Nature of service and users

In the app, users can create an account to view, create and share parenting tips and ideas.

The website includes a "contact us" function which includes a contact form where users provide name, email, subject and message. This aspect of the service is protected by a third party's Captcha service, which involves the use of cookies or similar technologies. Further details of security measures applied to our processing are provided in Step 2 above.

The app retains content viewing history and we undertake limited profiling activities of users based on activity they undertake when logged in to customer accounts. We use this data along with user preferences, to recommend similar content to these users.

The website contains links to our social media pages and includes functionality which enables users who have external social media accounts to share content on their social media pages. Social media providers linked to by the site are joint controllers for the processing of this personal data.

Users' expectations

We consider that the above processing will be in line with users' expectations. It is clearly explained in our privacy notice, which is written in basic, easy-to-understand language.

Certifications

- Our health content and content production process is accredited by the [Patient Information Forum PIF Tick](#)
- We hold Cyber Essentials certification
- We are registered with the Information Commissioner's Office
- We are registered with National Cyber Security Center

Purposes of the processing

In this section, we cover the purpose of our data processing and what the intended effect of our users is.

Aim of our service

Our mission is to support parents to give their children the best start in life.

Intended effect on individuals

We have designed the EasyPeasy app in partnership with parents and partners to help inspire positive interactions between parents and their children through offering fun, engaging activity ideas, and evidence-based tips and advice. This is because we know that positive parent-child interactions are the single biggest influence on children's healthy early development.

Benefits of the processing

There are many benefits to the ways in which we process user data, from ensuring we are able to effectively reach parents and carers with the EasyPeasy app, to providing them with a secure and personalised service that is relevant and timely to their needs, as well as helping to keep them engaged and develop more positive habits and behaviours with their child.

Step 3: Our consultation process

In this section, we describe when and how we consult with key stakeholders including our end users, and other stakeholder groups to ensure appropriate security and data protection policies and approaches.

We regularly conduct user-testing within the app and consult with parents and professionals within the early years space when evaluating and making decisions regarding personal data and data protection, e.g. when considering the introduction of a new question in our impact survey, or during onboarding. We carefully evaluate the benefits versus risks of asking for additional data from our users and always A/B test new features with these user groups to evaluate them in practice. We discuss the use and impact of data we capture internally and with our partners.

We also encourage users to fill out a survey to help us understand the impact we're having and to understand our audience's equality and diversity. The survey is conducted online with users who have an account.

We encourage users to leave a rating and review on either Google Play Store or the Apple App Store and listen to any feedback we receive, including feedback that relates to the information and data we request from users as well as our privacy and data protection policies.

All of the content produced on the platform is subject to our Community Guidelines, which set out our responsibilities to moderate and ensure the quality of the content on the platform, as well as setting out user (ie parents and carers) responsibilities for child safeguarding. Our content quality assurance process includes accreditation from the Patient Information Forum through the health content quality mark, the PIF Tick. Finally, all content is tagged with appropriate milestones from the internationally recognised child development framework, Ages and Stages.

We note that where residual risks have been identified, we are satisfied that they are limited and appropriate measures are in place to mitigate potential harm.

Step 4: Assessment of necessity and proportionality

In this section, we describe our compliance and proportionality measures, in particular our lawful basis for processing, and how it achieves our purpose, and how to stop function creep. We set out our strategies to ensure data quality and data minimisation, how we support individual's rights, and how we ensure other data processors that we work with comply with our policies. We also set out how we ensure GDPR compliance of international transfers and how we safeguard the small number of international transfers that occur within our current data system.

Lawful basis for processing

Our lawful basis for processing data rests on consent, contractual necessity, and legitimate interests:

- **Consent (Article 6(1)(a)GDPR):** processing connected with recommending content based on user preferences and activity; processing connected with the sending of e-newsletters where a person has opted-in to receiving them; processing of personal data in connection with functional/analytics/marketing cookies; processing survey responses that people have opted to complete.
- **Legitimate interests (Article 6(1)(f)UK GDPR):** sending e-newsletters based on the soft opt-in exception; processing of personal data connected with strictly necessary cookies (security cookies and functionality to enable a service requested by the user); corresponding with customers in response to enquiries; carrying out customer surveys; to administer and protect our business, app and website. We have completed legitimate interests assessments for all processing activities we carry out on this basis.
- **Explicit consent (Article 9(2)(a) GDPR)**: processing of special categories of personal data where the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

Necessity and proportionality

We consider that our processing achieves the purposes set out in step 2 and does not go beyond what is reasonably necessary to achieve these purposes.

To ensure there is no function creep we only use data for the limited purposes explained in this DPIA.

We ensure data minimisation and proportionality by only asking for data that we need for a current specified purpose.

Transparency and data subject rights

Individuals are given information about our processing through our online privacy notice which they are able to review when they create an account. It is also accessible from our app menu and website footer. Our cookie policy contains information about cookies used in the app and on our website. This is accessible through our cookie consent tool and from our website footer.

We explain about individuals' rights in our privacy notice and include an email address which individuals can use to contact us with any questions about their rights and to exercise their rights. Our team members who deal with queries on data protection matters and requests to exercise data subject rights have received basic training on dealing with requests and are familiar with the guidance produced by the ICO.

Processors

We use an accounts and authentication service, a recommendation engine service, multiple analytics providers, a notification service, an image and video processor, a Captcha provider, all of which act as processors. We have entered into Article 28(3) UK GPDR terms with each of these third parties and carried out appropriate security risk assessments.

The Article 28 agreements include a contractual obligation for the processor to use EU SCCs and undertake a risk assessment if or when engaging the services of a sub-processor who is transferring data to a third country.

International transfers

We work with a GDPR compliance provider, Iubenda, to ensure the GDPR compliance of our privacy policy and terms & conditions.

Transfers of data are made in connection with the sharing of personal data with our third-party processors. Our hosting provider keeps user data in the UK. Our analytics providers are based in Europe and North America. Our recommendation service is based in Europe. Our notification service is based in North America.

In all cases where user data is transferred and processed outside of the EU, Standard Contractual Clauses have been reviewed and are in place providing adequate protections for the privacy rights of our users that are GDPR compliant.

Best interests of the child

The app is designed for use by adult parents and carers of 0-5-year-old children, and not designed to be given to a child to use unattended. However, it is possible that a child could see and possibly interact with the app and we have taken actions to mitigate the risks associated with this. Our moderation process and Community Guidelines ensure that content on the platform is safe for and appropriate for children. We do not collect specific

information about children beyond their date of birth which we use to show their parents' or carers' content specific for a child of that age.

Data protection impact assessments: We have completed this DPIA which covers all customer data processing activities carried out. We keep this DPIA under review and are aware of the need to update it if we make any changes to our processing of customer personal data. We make the up-to-date version of this DPIA available on request.

Age Appropriate Application

The app is clearly geared towards parents and carers of 0-5 year-olds and holds little entertainment value for children in of itself. Parents and carers are encouraged to put their device down and play the games offline with their children. We only collect and process limited personal data from all users, and our use of data is limited to what people would expect in the context of an online content app. We apply the same standards and carry out the same processing activities in relation to all users.

Transparency

We provide a privacy notice and cookie policy explaining how we use personal data and how cookies are used in our app and on our website. In addition, we provide additional specific bite-sized explanations about how we use personal data at the point at which we collect it.

Detrimental use of data

We do not use personal data in any way which could be detrimental to a child's or any other person's well-being.

Policies and community standards

We follow our terms and conditions and privacy notice and only use data in accordance with these documents. We will delete the accounts of users that do not follow our standards. We will also delete any data collected against their account.

Default settings

As our website only has basic functionality, we do not use privacy settings unless the user creates an account. Account holders' privacy is set as high by default. This means we do not collect more data than is necessary to provide the app service and newsletter service that comes with a user account. User account holder data is not visible to other users.

No cookies (apart from strictly essential cookies) are placed before a user consents to such cookies. All other cookies are set as default to "off".

Data minimisation

We only collect and process the minimum amount of personal data we need for the functioning of the app.

Data sharing

Data is shared with the third parties described under the heading "Data sharing" in Step 2.

Geolocation

We do not collect precise location data from our users. We do ask for a postcode from our users to ensure that we deliver contracts with our local government partners efficiently and correctly, and so that we are able to effectively monitor our shared reach to low-income households, which is a key part of our social mission and strategic objective.

Parental controls

We have analysed the processing we carry out and do not think that any of it presents a risk which would require us to offer parental controls. Parents or guardians can contact us with any queries they have about our processing of their child's personal data, ask us to delete the personal information we have collected in connection with their child from our records, and exercise rights on behalf of their child. We confirm the identity of the adult as the parent or guardian of the child before carrying out any of the above.

Profiling

We carry out limited profiling activities to provide recommendations of content to users based on their interests and browsing activities.

We do not offer external advertising to users of the service.

Nudge techniques

We do not use nudge techniques to encourage children to provide us with data or consent to the processing of their personal data.

Connected toys and devices

We do not use connected toys or devices in the delivery of EasyPeasy.

Online tools

All emails and our generic e-newsletter contain an unsubscribe link. Users who have registered for an account also have the option to delete their account at any time (subject to limited data retention in line with our retention policy).

Step 5: Identification and assessment of risks

We have carefully reviewed our processing and do not think that we carry out any activities that are likely to pose a significant risk to users. Specifically, we are satisfied, that the processing is not likely to give rise to any of the following harms:

- access to websites offering age-inappropriate content or activities;
- financial harm (eg advertising encouraging inappropriate or excessive spending online);
- grooming or abuse;
- inappropriate sharing of personal information, including via uploading content containing children's personal data;
- access to inappropriate goods;
- discrimination (around price of products);
- harassment, bullying, loss of social standing leading to self-esteem and mental health issues;
- intrusion into private spaces and associated loss of privacy for the child;
- inaccessibility of services or discrimination due to a disability; or
- service lock-in ie: unfair contractual terms.

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high
The app is designed for use by adult parents and carers of 0-5 year old children, and not designed to be given to a child to use unattended. However, it is possible that a child could see and possibly interact with the app.	Remote	Minimal	Low
Gaps in monitoring and moderating data leads to inappropriate content being viewable on the app for periods of time, including by children.	Possible	Significant	Medium
Our failure, or the failure of our users (ie parents and carers) to uphold our Community Guidelines exposes children to harm.	Possible	Significant	Medium

Step 6: Identification of measures to reduce risk

In this section, we set out measures we have taken to reduce or eliminate medium or high risks identified above.

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved

		Eliminated reduced accepted	Low medium high	Yes/no
Gaps in monitoring and moderating data leads to inappropriate content being viewable on the app for periods of time, including by children.	All newly published user generated content and comments are flagged to our Moderation team immediately through automated notifications for review. Notifications are monitored during our working hours which are Monday - Friday 9.00-18.00	Reduced	Low	Yes
Our failure, or the failure of our users (ie parents and carers) to uphold our Community Guidelines exposes children to harm.	Through our Community Guidelines we make clear to users that content on the EasyPeasy app includes user generated content that is the responsibility of the content creator. We make clear that content may contain medical advice that is incorrect, and that parents and carers should always consult their doctor for medical advice, and call 999 in the case of an emergency.	Reduced	Low	Yes

Step 7: Review and sign off

This DPIA will be kept under review by:
- Jen Lexmond, EasyPeasy DPO

Last reviewed 1/08/24