



# **Play Allo**

## **Data Protection Information Audit**

## Information Audit

This Information audit was undertaken as part of Play Alloa's preparation for GDPR.

GDPR touches upon how we use and store data, for how long and for what purpose. It addresses how we inform individuals about which data we hold, how to anonymize the data and how we delete it.

It also requires control over scenarios such as who responds to a request from the consumer exercising their right to be 'forgotten' and to make sure that it's dealt with within reasonable time.

### Starting Line - The Audit

The first thing an organisation must, therefore, do is an audit on all the information is processes, including:

1. What data does our company hold?
2. Where does our company store this data?
3. What is our data used for?
4. Who has access to our data?

This report aims to highlight the range of data Play Alloa holds, its purpose and the legal basis (if any) for holding such data.

### Audit Content:

1. Service User Information
2. Parent/Carer Information
3. Staff Information
4. Volunteer Information
5. Partner Organisation/External Contact Information
6. Apps/Programme used in our Communication:
  - a) Mobile Phone: Mighty Text
  - b) Website: Go Daddy/Word Press
  - c) Email: Go Daddy/Outlook
  - d) Newsletters: Mail Chimp/Google
  - e) Evaluations: Survey Monkey/Google
  - f) Social Media: Facebook/Twitter
7. Ways of Recording/Retaining Information
  - a) CCTV
  - b) Photos/Video
  - c) PVG Retention
8. Amendments

# 1. Service User Information

- **What data do you collect?**
  - **Service User Registration Forms:**
    - Service User name, address, date of birth
    - Parent/carer name, address, contact numbers
    - Doctors name, surgery address and contact number
    - Medical conditions and allergies
    - Involvement with other agencies
    - Management of Service User: e.g. general behaviour, supervision needs, mobility/travel, speech and communication, toileting, feeding, dressing, play interests
  - **Data Update Forms (Checked 6 monthly):**
    - Service User name, address, date of birth, conditions, medical information, which sessions they are assigned to, parent/carer contact numbers and email address
  - **Referral Forms:**
    - Referral name, service address and contact number
    - Parent/carer name, address, contact numbers
    - Service User name, address, date of birth, age
    - Reason for referral
    - Management of Service User: e.g. general behaviour, supervision needs, mobility/travel, speech and communication, toileting, feeding, dressing, play interests
    - Consent from Parent/Carer for information to be sent to us
  - **Support Packages:**
    - Service User name, address, date of birth
    - Parent/carer name, address, contact numbers
    - Doctors name, surgery address and contact number
    - Medical conditions and allergies
    - Involvement with other agencies
    - Management of Service User: e.g. general behaviour, supervision needs, mobility/travel, speech and communication, toileting, feeding, dressing, play interests
  - **Incident Records**
    - Aggressive Behaviour
    - Child Protection Issues
    - Incidents and Accidents
  - **Session Registers**
    - Attendance
    - Donations/Payments
    - Permissions: photo use, medication etc.
- **Where do you collect it from?**
  - Parent/Carers
  - Service User Registration form
  - Referral from external agencies (with parent consent)

- **Why do you need to hold all the data?**
  - So that we have the necessary medical/behavioural background information on a Service User
  - In order to allocate to appropriate sessions
  - Gift Aid purposes
  - In order to contact Families
  - For Emergency contact numbers, should they be needed in session
  - For invoicing Purposes
  - For Care Inspectorate/Regulatory Requirements
  
- **Who has access to it?**
  - Office Staff
  - Session Co-ordinators
  
- **What do you do with the data?**
  - Send a letter/registration form to Service User's family
  - Input onto the Play Alloa database/discussion boards
  - Set up a Service User File which is kept in the office filing cabinet
  - Add to the office Mobile Phone
  - Copies are printed out for each session that a Service User attends and they are placed in the session folders
  - Updates indicating consent are requested every 6 months

<b>GDPR Recommendation</b>	
• <b>Sensitive Information</b>	Yes
• <b>Legitimate Interest</b>	Yes
• <b>Legal Basis</b>	<ul style="list-style-type: none"> <li>• Explicit Consent</li> <li>• Legal Obligation</li> <li>• Vital Interest</li> <li>• Not-for-Profit Organisation</li> <li>• Medical Purposes</li> <li>• Equality of Opportunity</li> </ul>

## 2. Parent/Carer Information

- **What data do you collect?**
  - **Service User Registration Forms:**
    - Parent/carers name, address, contact numbers, email address
  - **Referral Forms:**
    - Parent/carers name, address, contact numbers
    - Consent from Parent/Carer for information to be sent to us
  - **Support Packages:**
    - Parent/carers name, address, contact numbers
  
- **Where do you collect it from?**
  - Parent/Carers
  - Service User Registration form
  - Referral from external agencies (with parent consent)
  
- **Why do you need to hold all the data?**
  - In order to contact Families
  - For Emergency contact numbers, should they be needed in session
  - For invoicing Purposes
  - It is a Care Inspectorate Requirement
  - Gift Aid purposes
  
- **Who has access to it?**
  - Office Staff
  - Session Co-ordinators
  
- **What do you do with the data?**
  - Send a letter/registration form to Service User's family
  - Input onto the Play Alloa database/discussion boards
  - Set up a Service User File which is kept in the office filing cabinet
  - Add to the office Mobile Phone
  - Copies are printed out for each session that a Service User attends and they are placed in the session folders
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### 3. Staff Information

- **What data do you collect?**
  - Staff details:
    - Basic Staff Details: Staff member name, address, date of birth, email address, telephone numbers
    - Emergency contact numbers
    - National Insurance number
    - References
    - PVG reference number
    - SSSC Registration details
    - Bank details
    - Medical issues/attendance records
    - Training Records
    - Grievance/Disciplinary Records
    - Photographs
    - Hours Worked:
  
- **Where do you collect it from?**
  - Application form
  - Staff Appraisal
  - Staff information sheet
  - Staff timesheets
  
- **Why do you process that data?**
  - Staff payroll
  - Staff contracts
  - Staff Management
  - References
  
- **Who has access to it?**
  - Office Staff
  
- **What do you do with the data?**
  - Input onto the Play Alloa database
  - Input records i.e. references onto individual staff files on Play Alloa server
  - Prepare and produce a file for each member of staff (filing Cabinet)
  - Input onto Payroll Manager
  
- **Why do you need to hold all the data?**

- To have emergency contact numbers
- To pay staff salaries
- Tax/pension purposes
- Legal reasons – PVG
- Grievance/Disciplinary Issues
- Absence/Holiday Recording
- CPD: Continual Personal Development

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## 4. Volunteer Information

- **What data do you collect?**
  - **Volunteer details:**
    - Basic Volunteer Details i.e. name, address, date of birth, email address, telephone numbers, Medical Issues, Emergency contact numbers
    - PVG reference number
    - References
    - Hours worked, Attendance
    - Grievance/Disciplinary Information
    - Training Records
  
- **Where do you collect it from?**
  - Application form
  - Volunteer information sheet
  - Volunteer Timesheets
  
- **Who has access to it?**
  - Office Staff
  
- **What do you do with the data?**
  - Input onto the Play Alloa database
  - Create and retain an individual file in the Volunteer filing cabinet
  - Create and retain an individual folder in the Play Alloa Server
  - Track hours for submission to Saltire Award Scheme and reference purposes
  
- **Why do you need to hold all the data?**
  - To have emergency contact numbers
  - Legal reasons – PVG
  - To be able to contact about session changes/cancellations and volunteering opportunities
  - Record of Hours worked

<b>GDPR Recommendation</b>	
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## 5. Partner Organisation/External Contact Information

- **What data do you collect?**
  - Name
  - Email address
  - Organisation
  - Department
  - Job title
  - Phone number
  - Address
  - Bank Details (if applicable)
  
- **Where do you collect it from?**
  - Partners and external contacts
  
- **Who has access to it?**
  - Office Staff
  
- **What do you do with the data?**
  - Export it to Mailchimp
  - Issue Information Newsletter
  - Enter onto a contacts database
  
- **Why do you need to hold all the data?**
  - Invoicing purposes
  - General business purposes
  - Updates and information
  - Partnership working

<b>GDPR Recommendation</b>	
• <b>Sensitive Information</b>	No
• <b>Legitimate Interest</b>	Yes
• <b>Legal Basis</b>	<ul style="list-style-type: none"><li>• Not-for-Profit Organisation</li><li>• Performance of a Contract</li></ul>

## 6. Apps/Programme used in our Communication:

- a. Mobile Phone: Mighty Text/Google Contacts
- b. Website: Go Daddy/Word Press
- c. Email: Go Daddy/Outlook
- d. Newsletters: Mail Chimp/Google
- e. Evaluations: Survey Monkey/Google
- f. Social Media: Facebook/Twitter

### a. Mobile Phone: Mighty Text:

- Contact numbers for staff and volunteers (along with emergency contact information for staff, volunteers and service users) is inputted onto the mobile phone and stored via **Google Contacts**.
  - **Google is compliant with the EU-US Privacy Shield Framework**
- Text messages are sent out via **MightyText**, an online application which connects to both the office mobile phone and the Google account to send out correspondence
  - **MightyText is GDPR compliant**

### b. Website: GoDaddy/WordPress

- As far as possible, we have ensured that our website is GDPR compliant and will continue to do so.
- **GoDaddy:** GoDaddy is the provider of our domain name for the website playalloa.co.uk
  - **GoDaddy is GDPR compliant with a EU-US Privacy Shield Framework**
- **WordPress:** Our website currently runs on version 4.9.6 of the core WordPress software
  - **WordPress is GDPR compliant**
- Other areas will be affected that are not necessarily covered by the core software, such as certain Plugins involving the gathering of information: Our website contains contact forms, which visitors can fill out and send to us. These forms contain contact information so that we can respond to any enquiries.
  - **The plugin used for these forms is called Ninja Forms, which is GDPR compliant**

- To further ensure that these forms are GDPR compliant, they contain a checkbox giving consent for us to use the information to contact them
- We use **Google Analytics and Cloudflare** as our website trackers, tracking visits to our website, method of access etc.
  - **Google Analytics is GDPR compliant with the EU-US Privacy Shield Framework**
  - **Cloudflare is GDPR compliant with the EU-US Privacy Shield Framework**

#### **c. Email: GoDaddy/Outlook**

- **GoDaddy:** We currently use the Workspace Webmail online application to access emails. This service is provided by **GoDaddy**
  - **GoDaddy is GDPR compliant with the EU-US Privacy Shield Framework**
- **Outlook:** We are currently exploring the possibility of transferring our email to **Microsoft 365 Outlook**
  - **Microsoft Outlook is GDPR compliant**

#### **d. Newsletters: MailChimp/Google**

- Newsletters containing information and updates on Play Alloa are currently circulated via **MailChimp**, an online application that allows us to send out tailored newsletters to groups of people eg staff/volunteers, parents/carers, partner organisations and individuals.
  - **Mailchimp is GDPR compliant**

#### **e. Evaluations – Survey Monkey**

- Survey Monkey is a website that allows us to create and distribute surveys and questionnaires eg. staff appraisals, volunteer exit interviews, service user evaluation etc
  - **Survey Monkey is GDPR compliant**

## **f. Social Media: Facebook/Twitter**

- At Play Alloa we use **Facebook** and **Twitter** to post regular updates, including thank you posts to donors.
- Posts go out to those who have 'liked' or 'followed' us and therefore they give consent to see the content.
- We seek permission for any Photos we post on **Facebook** or **Twitter** as part of our registration process
  - **Facebook is GDPR compliant**
  - **Twitter is GDPR compliant**

## 7. Additional Ways of Recording/Retaining Information

1. CCTV
2. Photos/Video
3. PVG Retention

### a. CCTV

- CCTV is installed on our premises for safety and security reasons.
- CCTV images are captured and stored for a limited time.
- These images are only accessed by office staff when necessary and only made public (to the appropriate body) for reasons relating to security or child/vulnerable adult protection

### b. Photos/Video

- Photo/video consent is gained when a Service User initially registers to use our service.
- Consent is regained every 6 months via our Data Update Forms
- This information is recorded on the database
- This information is checked before any outings and recorded on any necessary paperwork
- Photos taken are stored on a secure server

### c. PVG Retention

- As per our Secure Handling of PVG policy:
  - i. PVG information will only be shared with those authorised to see it in the course of their duties.
  - ii. Where additional PVG information is provided to Play Alloa and not to the disclosure applicant,
    - a. Play Alloa will not disclose this information to the applicant, but will inform them that additional information has been provided, should this information affect the recruitment decision.

- iii. PVG Certificates will be stored in a locked non-portable container, for the duration of employment. Only those authorised to see this information in the course of their duties will have access to the container.
- iv. PVG Certificates will be destroyed on cessation of employment, by shredding and basic information ie. PVG number will be retained for future reference purposes for 1 year.
- v. Play Alloa will ensure that all staff with access to disclosure information are aware of this policy and have received relevant training and support.

NB. Play Alloa will continue to monitor and evaluate its data processing, and this audit may incur changes from time to time. These Changes will be highlighted as amendments and dated.

## 8. Amendments

Previous	Amendment	Date