TRUE

POLICY 13 · DATA POLICY

# Data Protection and DPIA

The data protection impact assessment for the TRUE panel, records of processing, retention schedule, breach procedure, subject access and Children's Code settings.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

**TRUE holds personal data about young people, so it is designed in from the start: a full impact assessment before launch, a record of every type of processing, set retention periods, a tested breach procedure and app settings that meet the Children's Code.**

## 1. Purpose and scope

**1.1** This policy sets out how TRUE meets the UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations and the ICO's Age Appropriate Design Code (the Children's Code). It applies to everyone at TRUE and every company that processes data for TRUE.

## 2. Roles

| Who | Role |
|---|---|
| **True Intel Ltd, trading as TRUE** | Controller, registered with the ICO, registration number CSN5763647. |
| **Victoria Phillips, Director** | Data protection lead. Signs off the DPIA, handles breaches and rights requests. |
| **TRUE staff** | Follow this policy, complete data protection training and report any breach straight away. |
| **Processors, such as Staffwise, app hosting, payroll and pension providers** | Process data only on TRUE's written instructions, under a contract that meets Article 28 of the UK GDPR. |

## 3. Data protection impact assessment

**3.1** A DPIA is required because TRUE processes the data of young people aged 16 and 17 on a large scale, records location at check-in and check-out, collects images and voice recordings, and runs an app likely to be used by under-18s. It was completed before launch.

| Area | Summary |
|---|---|
| **Nature** | Recruitment, onboarding, assignment matching, check-ins, reports, pay, safety, safeguarding and optional content. |

| Area | Summary |
|---|---|
| **Scope** | A panel of up to 5,000 workers aged 16 and over, and the parents or guardians of those under 18. Contact, pay, location at check-in, reports, and optional health and content data. |
| **Context** | Many workers are 16 or 17. They expect their data to be kept private from clients, schools and the public. |
| **Purpose** | Running the Worker Agreement, meeting legal duties, keeping workers safe and giving clients anonymous insight. |
| **Necessity** | Each data item is tied to a purpose and a lawful basis in the Worker Privacy Notice. Optional fields are clearly optional. |

**3.2** Risks and measures:

| Risk | Before measures | Measures | After measures |
|---|---|---|---|
| **Unauthorised access to young people's data** | Possible, high | Encryption, multi-factor sign-in for staff, role-based access, processor contracts, security test before launch | Low |
| **Location data revealing a worker's home or routine** | Possible, high | Location recorded only at check-in and check-out, never tracked, deleted after 12 months, never shared | Low |
| **Images of under-18s misused or published** | Possible, high | Separate opt-in from worker and parent, review before sharing, no names or locations, set retention periods | Low |
| **Clients identifying or contacting workers** | Possible, medium | Results shared without contact details, client terms, Code of Conduct Part B | Low |
| **Collecting more than is needed** | Possible, medium | Annual minimisation review, optional fields off by default | Low |
| **Profiling or nudging young people** | Possible, medium | No profiling for marketing, no nudges, notifications only 10:00 to 19:00 | Low |
| **Wrong age leading to wrong safety limits** | Possible, high | Date of birth checked at onboarding, limits applied and switched automatically | Low |
| **Overseas transfers by providers** | Possible, medium | UK adequacy rules or an international data transfer agreement | Low |

**3.3** After these measures the remaining risk is low, so processing can go ahead without consulting the ICO first. The DPIA was signed off by Victoria Phillips on 3 November 2026. It is reviewed every year, and before any new task type, provider or use of data.

## 4. Record of processing activities

| Activity | Data | Lawful basis | Shared with |
|---|---|---|---|
| **Recruitment and onboarding** | Identity, contact, date of birth, ID check result, parent or guardian details | Contract, legal obligation, legitimate interests | Staffwise |
| **Assignments and reviews** | Bookings, check-ins, reports, survey answers, review decisions | Contract | Clients, without contact details |
| **Pay and payroll** | Bank details, National Insurance number, tax, hours, holiday pay | Contract, legal obligation | Payroll provider, HMRC, pension provider |
| **Safety and incidents** | Emergency contact, incidents, injuries | Legal obligation, vital interests | HSE where RIDDOR applies |
| **Safeguarding** | Concerns and referrals | Legal obligation, substantial public interest | Children's services, LADO, police |
| **Photos, voice and video** | Content and consent records | Consent | Clients, as opted in |
| **Equality monitoring** | Protected characteristics | Consent | No one, used anonymously |
| **Client contacts** | Names and business contact details | Legitimate interests | No one |

## 5. Retention schedule

| Record | Keep for |
|---|---|
| **Applications from people who don't join** | 6 months |
| **Worker, hours, pay, tax and review records** | 6 years after the last assignment |
| **Parent or guardian consent records** | 6 years after the worker's last assignment |
| **Check-in and check-out locations** | 12 months |

| Record | Keep for |
|---|---|
| **Incident and injury records** | At least 3 years, and until the worker turns 21 if they were under 18 at the time |
| **Safeguarding records** | As safeguarding guidance requires |
| **Photos, voice and video** | As the Image, Voice and Video Consent Policy sets out |
| **Complaints** | 3 years after closing |
| **Whistleblowing reports** | 6 years after closing |
| **Equality monitoring** | Made anonymous after 12 months |
| **Client business contacts** | 2 years after the last contact |

**5.1** The platform deletes or anonymises records automatically when their period ends. Victoria Phillips checks this every quarter.

## 6. Breach procedure

| Step | When | What happens |
|---|---|---|
| **1. Contain** | Straight away | Whoever finds the breach acts to stop it, such as revoking access or recalling an email. |
| **2. Report** | Within 1 hour | They tell Victoria Phillips. Processors tell TRUE without delay. |
| **3. Assess** | Within 24 hours | Victoria Phillips assesses the risk to the people affected, especially young people. |
| **4. Tell the ICO** | Within 72 hours of TRUE becoming aware | If there is a risk to people's rights, TRUE reports it to the ICO. |
| **5. Tell people** | Without delay | If the risk is high, TRUE tells the people affected and, for under-18s, their parent or guardian. |
| **6. Learn** | Within 30 days | Every breach, reported or not, is logged with what happened, the decision and the lessons learned. |

## 7. Subject access and other rights

**7.1** A request can be made in any way, including verbally or in the app. Any staff member who receives one logs it straight away.

**7.2** TRUE checks the person's identity in a proportionate way, and replies within one month for free. If a request is complex, TRUE can extend this by up to two months and tells the person within the first month.

**7.3** TRUE makes reasonable and proportionate searches, and removes information about other people before sending.

**7.4** Data about a worker aged 16 or 17 belongs to the worker. A parent's request for it is only answered with the worker's agreement, unless the worker's safety requires otherwise.

## 8. Children's Code settings

| Standard | TRUE's setting |
|---|---|
| **Best interests of the child** | Wellbeing is considered in every design decision and in this DPIA. |
| **DPIA** | Completed before launch and reviewed every year. |
| **Age appropriate application** | The whole app meets the Code for every user, whatever their age. |
| **Transparency** | A privacy notice written for 16-year-olds, plus short explanations in the app at the point data is collected. |
| **Detrimental use** | No streaks or rewards for working more. Hours limits enforced. Notifications only 10:00 to 19:00. |
| **Policies and community standards** | TRUE's policies are published and followed in practice. |
| **Default settings** | High privacy by default. Optional fields and sharing are off until the worker turns them on. |
| **Data minimisation** | Only the data each task needs is collected. |
| **Data sharing** | Only as set out in section 4. Never sold. |
| **Geolocation** | Off by default. Recorded only when the worker taps check in or check out, with an on-screen sign. |
| **Parental controls** | Parents receive consent and safety information, not monitoring. Workers are told what parents can see. |
| **Profiling** | Off by default. Only used to match assignments by location, age and availability. Never for marketing. |
| **Nudge techniques** | None used to weaken privacy or keep workers working. |

| Standard | TRUE's setting |
|---|---|
| **Connected toys and devices** | Not used. |
| **Online tools** | Workers can see, download, correct and delete their data, and withdraw consent, in the app. |

## 9. Security and training

**9.1** TRUE uses encryption, multi-factor sign-in for staff, role-based access and secure devices, as the Staff and Client Code of Conduct sets out. Every staff member completes data protection training before they can access worker data, and again every year.

**9.2** This policy and the DPIA are reviewed every year, and sooner if the law, TRUE's systems or its activities change.

| Version | Approved by | Approved on | Next review |
|---|---|---|---|
| **1.0** | **Victoria Phillips, Director** | **3 November 2026** | **November 2027** |