



SuperPenguin

Digital Speech, Language and Communication Needs Platform

Service Definition Document

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1 | Definitions

For the purposes of this Service Definition Document, the following definitions apply:

Term	Definition
Annual Contract Value (ACV)	The total value of the Platform Licence Fee payable in any 12-month period, excluding VAT and one-time fees.
Authorised Users	Employees, agents, and independent contractors of the Buyer authorised to use the Service.
Content Module	A clinically-validated therapeutic pathway within the SuperPenguin platform addressing specific speech, language, and communication needs.
Eligible Family	A family within the Buyer's catchment area whose child(ren) or adult family member(s) have been identified as having Speech, Language, and Communication Needs (SLCN) and who are eligible to receive services from the Buyer's organisation.
Extended Family Access	Additional caregivers (grandparents, siblings, teachers, SENCOs) registered under an existing Family licence at no additional cost.
Family	A single household unit comprising up to 2 parents or carers and up to 4 children or adults (i.e., patients) registered on the SuperPenguin platform, linked to a single activation code and case ID in the clinical dashboard.
Platform Licence Fee	The recurring annual fee for access to the SuperPenguin platform, calculated based on Eligible Family population.
Service	The SuperPenguin cloud software service as described in this document.
SLCN	Speech, Language, and Communication Needs.
SLT	Speech and Language Therapist/Therapy.
SPMA	SuperPenguin Mobile Application, the patient-facing iOS/Android app.
SPWD	SuperPenguin Web Dashboard, the clinician-facing browser-based dashboard.

For pricing terms and commercial definitions, refer to the Pricing Document. For contractual terms and conditions, refer to the Terms and Conditions Document.

2 | Service Overview

2.1 About SuperPenguin

SuperPenguin is a clinically-validated digital therapeutic platform designed to support families and individuals with Speech, Language, and Communication Needs (SLCN). Co-developed with NHS Speech and Language Therapy teams and backed by £1.5M NIHR Invention for Innovation funding, the platform delivers evidence-based care pathways



supporting 70% of standard NHS SLT caseloads through an intuitive mobile application for families and a comprehensive web dashboard for clinical staff.

The platform includes 13 clinically-validated content modules spanning paediatric and adult populations. Each module has been developed in partnership with clinical experts and, where appropriate, co-produced with affected communities—notably the Trans Voice Therapy module developed in collaboration with the transgender community to address significant health inequalities in SLCN services.

2.2 Regulatory Classification

SuperPenguin is classified as a Class I medical device under UK MDR 2002 and holds UKCA marking. The Supplier maintains appropriate registration with the MHRA and operates a quality management system compliant with ISO 13485.

2.3 Service Components

Component	Description
SuperPenguin Mobile Application (SPMA)	iOS and Android mobile application for families, delivering consistent, evidence-based interventions throughout the care pathway. Available 24/7 with offline capability.
SuperPenguin Web Dashboard (SPWD)	Browser-based clinical dashboard enabling NHS staff to manage referrals, generate activation codes, and monitor aggregated and individual patient progress with real-time analytics.

2.4 NHS Long Term Plan Alignment

SuperPenguin directly supports the NHS Long Term Plan strategic priorities:

NHS Priority	SuperPenguin Contribution
From hospital to community	Moves early intervention into homes, schools, and community settings
From analogue to digital	Provides a single scalable platform replacing fragmented paper-based resources
From sickness to prevention	Enables early intervention at referral and pre-referral stages

3 | Service Features and Benefits

3.1 Features

- Evidence-based digital therapeutic solution co-developed with NHS Speech and Language Therapists and backed by £1.5M NIHR Invention for Innovation funding



- Patient-facing mobile app (iOS/Android) accessible 24/7, with SLT web dashboard for remote monitoring and clinical management
- 13 clinically-validated content modules: Universal Early Years, Stammering, Speech Sound Disorders (Pre/Post-Assessment), Language Development, Autism (Pre-Assessment), Social Communication, Deafness and Hearing Loss, Aphasia, Dysarthria, Apraxia, Cognitive Communication, and Trans Voice Therapy
- Community co-production: specialist modules developed in partnership with affected communities, including collaboration with the trans community for Trans Voice Therapy and the National Autistic Society for Autism support
- All-inclusive SLCN coverage: all future content modules included at no additional cost, covering emerging clinical needs across paediatric and adult populations
- Extended care ecosystem: parents, grandparents, siblings, and education staff (teachers/SENCOs) can support therapy goals at no additional cost
- Remote monitoring intelligence supporting the entire care pathway: provides SLTs with structured data to inform clinical decision-making during triage, assessments, active therapy, discharge, and long-term maintenance
- Clinician web dashboard with real-time analytics, engagement tracking, progress monitoring, and service-level capacity planning
- Unlimited clinician seats with lifelong access for families and extended family members
- Full NHS compliance suite: UKCA Class I Medical Device (UK MDR 2002), ISO 13485, DCB0129 Clinical Safety, NHS DSPT, Cyber Essentials Certified, ISO 27001 aligned, ORCHA certified

3.2 Benefits

- Increase service capacity by moving low-complexity interventions to digital platform, freeing clinical time for complex cases and reducing waiting lists
- Supports 70% of standard NHS SLT caseloads through digital-first delivery
- Accelerate clinical outcomes through high-dosage support: patients practise daily at home rather than relying solely on infrequent clinic visits
- Early support: prevent waitlist deterioration by enabling families to begin evidence-based activities immediately while awaiting specialist assessment
- Reduce Did Not Attends: continuous digital engagement maintains family connection with services between appointments
- Extend reach: serve families in rural or underserved areas through digital delivery, eliminating geographical barriers
- Cost efficiency: per-family pricing model with no per-seat limitations enables whole-service transformation
- Future-proof investment: all new modules and features included at no additional cost throughout the contract term



4 | Content Modules

SuperPenguin includes 13 clinically-validated content modules covering paediatric and adult populations. All current and future modules are included within the Platform Licence Fee at no additional cost.

4.1 Children's Modules

Universal (Early Years): Foundational communication support for parents and carers of children under 5 years old, covering essential topics including understanding different forms of communication, being present with your child, and following the child's lead during interactions. Designed for busy families with concise, practical strategies that can be integrated into everyday routines.

Stammering: Comprehensive support for parents and carers of children aged 2-12 who stammer, providing education about stammering as a neurodevelopmental difference. Covers the 'stammering iceberg' concept, age-specific guidance, and practical activities helping families implement supportive strategies.

Speech Sound Difficulty (Pre-Assessment): Support for parents and carers of children aged 2-10 while awaiting assessment, helping them understand speech and language differences, articulation and phonology, and speech milestones. Includes phonological awareness activities supporting both speech clarity and early literacy development.

Speech Sound Difficulty (Post-Assessment): Targeted support available after a child has been assessed, providing guidance on readiness indicators for therapy, modelling and Cued Articulation techniques, and generalisation strategies to help children transfer skills across contexts.

Language (Early Years): Language development support for parents and carers of children aged 0-4, covering key concepts including receptive and expressive language, developmental milestones, and practical communication strategies including 'self-talk' and 'plus one' techniques.

Autism (Pre-Diagnosis): Developed in collaboration with the National Autistic Society (NAS), supporting parents and carers while awaiting an autism diagnosis. Covers autism characteristics including communication differences, stimming, focused interests, and sensory processing differences.

Social Communication (Early Years): Foundational communication support for young children not yet using words or in the earliest stages of communication development, covering non-verbal communication, visual supports, and interactive play strategies.

Deafness and Hearing Loss: Deaf awareness resources and practical support for families of deaf children, particularly those newly diagnosed, bringing together trusted



resources in one accessible location including signposting to the National Deaf Children's Society.

4.2 Adult Modules

Aphasia (Adult Brain Injury): Support for carers of individuals with aphasia, a language and communication disorder typically caused by stroke or brain injury. Covers foundational understanding, practical strategies for supported conversation, and carer wellbeing.

Dysarthria (Adult Brain Injury): Support for carers of adults with dysarthria, a condition affecting the ability to speak clearly due to weak or poorly coordinated muscles. Includes communication strategies and addresses psychological impact and role changes.

Apraxia (Adult Brain Injury): Support for carers of adults with apraxia of speech, where the brain struggles to plan and coordinate speech movements. Covers how apraxia differs from dysarthria and aphasia, with practical support strategies.

Cognitive Communication Difficulties (Adult Brain Injury): Support for carers of adults with cognitive-communication difficulties, when problems with thinking skills affect communication. Includes strategies for minimising distractions, structuring conversations, and recognising overwhelm.

Trans Voice Therapy Support: Co-produced with Leeds Beckett University and the transgender community, this module provides support for transgender individuals waiting for NHS voice therapy services. Developed using affirming, inclusive language and addressing the significant waiting times and health inequalities experienced by trans individuals seeking voice care. Provides practical voice care guidance whilst individuals await specialist services.

5 | Onboarding and Implementation

5.1 Implementation Timeline

Week	Activities
1-2	Kick-off meeting, stakeholder identification, technical setup initiation
2-3	Data Protection Impact Assessment review, clinical governance sign-off, MS SSO configuration
3-4	Staff training sessions, pilot cohort identification
4-5	Soft launch with pilot cohort, feedback collection
5-6	Full service launch, ongoing support handover

Standard implementation is completed within 4-6 weeks from contract signature:



5.2 Technical Requirements

Mobile Application (Families):

- iOS 12+ or Android 8+ (security advisory: Android 8/9 users should ensure devices receive security updates)
- Internet connectivity (Wi-Fi or mobile data)
- 100MB free storage for app installation
- Offline capability for downloaded content

Web Dashboard (Clinicians):

- Modern web browser (Chrome, Firefox, Safari, Edge, latest 2 versions supported)
- Internet connectivity
- No software installation required
- NHS Single Sign-On integration available

5.3 Training

Comprehensive training is included at no additional cost:

Training Type	Format	Duration
Clinical staff training	Live virtual sessions	Up to 8 hours
Refresher training	On-demand	As needed

Training materials are provided in digital format for ongoing reference.

6 | Hosting and Data Location

6.1 Cloud Infrastructure

SuperPenguin is hosted on Google Cloud Platform (Firebase), providing enterprise-grade infrastructure with automatic scaling, high availability, and comprehensive security controls.

6.2 Personal Data Storage Location

Location	Purpose
United Kingdom	Primary data storage and processing
European Economic Area (EEA)	Failover and disaster recovery only

Data Residency Guarantee: Personal data is not transferred outside the United Kingdom or European Economic Area. All data processing occurs within UK/EEA boundaries in accordance with UK GDPR requirements.



6.3 Architecture

The service operates as a multi-tenant Software as a Service (SaaS) solution with:

- Logical data separation via dedicated Firebase projects per NHS trust
- Isolated Firestore databases ensuring complete data segregation between organisations
- Multi-zone deployment providing automatic failover between availability zones
- Auto-scaling infrastructure ensuring consistent performance regardless of demand

6.4 Deployment Model

SuperPenguin is provided exclusively as a cloud-hosted service. No on-premise deployment option is available.

7 | Service Levels

7.1 Availability

Metric	Target
Service Availability	99.5% measured monthly (excluding planned maintenance)
Planned Maintenance Window	Sundays 02:00-06:00 UK time, with 7 days advance notice

7.2 Incident Response

Priority	Description	Response Time	Resolution Target
P1 Critical	Service unavailable	1 hour	4 hours
P2 High	Major feature impaired	4 hours	8 hours
P3 Medium	Minor feature impaired	8 hours	48 hours
P4 Low	Cosmetic or minor issues	24 hours	5 business days

8 | Security Practices

8.1 Certifications and Compliance

Certification	Status	Scope
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UK MDR 2002 Class I Medical Device	UKCA marked	Medical device regulation
ISO 13485	Compliant	Medical device quality management
ISO 27001	Compliant	Information security management
NHS DSPT	Compliant	2024/25 Standards Met
Cyber Essentials	Certified	Current certification
DCB0129	Compliant	Clinical risk management
UK GDPR	Compliant	Data protection
ORCHA	Certified	Digital health quality

8.2 Accessibility Compliance

SuperPenguin is currently partially compliant with WCAG 2.1 AA standards, covering approximately 60% of mobile-relevant NHS accessibility criteria. The Supplier is committed to achieving full WCAG 2.2 AA compliance.

Remediation Timeline:

Phase	Target	Scope
Q1 2026	Formal WCAG 2.2 audit	Gap identification
Q2 2026	Critical fixes	High-priority accessibility issues
Q3 2026	Remaining fixes	Complete remediation
Q4 2026	Compliant	WCAG 2.2 AA compliant

Interim Mitigations: OS-level accessibility features are supported, and alternative formats are available upon request. Accessibility reviews are included in all feature releases.

8.3 Technical Security Controls

Data in Transit:

- TLS 1.2 or higher encryption for all data transmission
- HTTPS enforced for all web communications

Data at Rest:

- AES-256 encryption for all stored data
- Encryption keys managed through Google Cloud Key Management Service
- Regular key rotation procedures in accordance with ISO 27001

Access Control:

- Role-based access controls (RBAC) with principle of least privilege
- NHS Single Sign-On (SSO) integration



- Session timeout and automatic logout
- Audit trail for all access events

Vulnerability Management:

- Penetration testing conducted at least annually by independent assessors
- Vulnerability assessments performed regularly
- Patch management procedures with defined timescales

9 | Support Services

9.1 Support Availability

Support Type	Availability
Standard Support	Monday to Friday, 09:00–17:00 UK time (excluding bank holidays)
Support Channels	Email and telephone

9.2 Included Support Services

All contracts include:

- Dedicated named account manager assigned at contract signing
- Email and telephone support during business hours
- Bug fixes and security updates at no additional cost
- Regular check-in meetings (monthly)
- Quarterly service reviews with documented outcomes
- Access to new modules and features at no additional cost
- Ongoing platform maintenance and enhancements

9.3 Account Management

Each NHS trust is assigned a dedicated account manager who serves as the primary point of contact throughout the contract term, providing:

- Proactive engagement and support
- Escalation management and priority handling
- Service improvement recommendations based on usage analytics
- Coordination of quarterly business reviews
- Training and onboarding refresher sessions as needed



10 | Data Protection

10.1 Data Processing Role

BeneTalk Ltd acts as a Data Processor on behalf of the Buyer (Data Controller) for the processing of personal data within the SuperPenguin platform.

10.2 Personal Data Processed

Data Category	Data Elements	Purpose
Patient Data	Name, date of birth, case ID	Service delivery and clinical monitoring
Carer Data	Name, email address, relationship to patient	Account management and communication
Usage Data	App engagement metrics, content completion	Clinical outcome monitoring and service improvement
Clinical Data	Assessment outcomes, progress indicators	Clinical decision support

A full DPIA is available, containing all the information on how data is processed and stored.

11 | Offboarding Process

11.1 Data Retrieval

Upon contract termination or expiry:

- Client data can be exported upon written request
- Data provided in CSV/JSON format
- Export completed within 30 days of written request
- Export includes: engagement metrics, content access logs, assessment outcomes, referral data, aggregated analytics

11.2 Data Deletion

Following data retrieval period (30 days):

- Anonymised for research purposes (with prior consent), or
- Securely deleted per retention obligations
- Deletion certificate provided upon completion
- Deletion performed in accordance with ISO 27001 procedures



- Verification of deletion available upon request

11.3 Transition Support

- Handover documentation provided
- Technical support available during transition period
- Export assistance included at no additional cost
- Transition meeting with account manager to ensure smooth handover

12 | Contact Information

speak@superpenguin.com

BeneTalk Ltd

Flat 7 Foxgrove House, Foxgrove Road

Beckenham, Kent, BR3 5AR

United Kingdom

Company Number: 09914647

