**IDL: Compliance with the ICO’s ‘Age-appropriate Design Code of Practice’**

What is the age-appropriate design code of practise?

The age-appropriate design code is a set of fifteen flexible standards – they do not ban or specifically prescribe – that provides built-in protection to allow children to explore, learn and play online by ensuring that the best interests of the child are the primary consideration when designing and developing online services.

[***More information can be found on the ICO website here***](https://ico.org.uk/for-organisations/guide-to-data-protection/ico-codes-of-practice/age-appropriate-design-a-code-of-practice-for-online-services/)

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| **Principle:** | **What does this mean?** | **What do IDL do to comply?** |
| **Best interests of the child** | The best interests of the child should be a primary consideration when you design and develop online services likely to be accessed by a child | IDL has been designed to identify, support, and improve areas of academic growth in children. We only aim to improve and broaden this service in terms of its effectiveness and scope of development for our learners  |
| **Data protection impact assessments** | Undertake a DPIA to assess and mitigate risks to the rights and freedoms of children who are likely to access your service, which arise from your data processing. Take into account differing ages, capacities and development needs and ensure that your DPIA builds in compliance with this code | DPIAs are frequently undertaken with regard to any change in process which includes the handling of any personal data. These DPIAs are reviewed frequently to identify, mitigate, and/or prevent the likelihood or significance of potential risk arising from any change we may make. |
| **Age-appropriate application** | Take a risk-based approach to recognising the age of individual users and ensure you effectively apply the standards in this code to child users. Either establish age with a level of certainty that is appropriate to the risks to the rights and freedoms of children that arise from your data processing or apply the standards in this code to all your users instead. | IDL specifically targets those in primary or secondary education who have dyscalculia. Our services are designed with consideration of that age range.  |
| **Transparency** | The privacy information you provide to users, and other published terms, policies, and community standards, must be concise, prominent and in clear language suited to the Icon  Description automatically generatedage of the child. Provide additional specific ‘bite-sized’ explanations about how you use personal data at the point that use is activated. | Privacy information has been documented (such as our privacy notice, cookie policy, and EULA) and displayed within our website and on our software. |
| **Detrimental use of data** | Do not use children’s personal data in ways that have been shown to be detrimental to their wellbeing, or that go against industry codes of practice, other regulatory provisions, or Government advice | We will only use your data for the purposes for which we declare it for. None of these reasons, or any prospective reasons that may come into effect in future, will pose any purpose other than that of to deliver our service and improve your areas in need of academic development |
| **Policies and community standards** | Uphold your own published terms, policies, and community standards (including but not limited to privacy policies, age restriction, behaviour rules and content policies) | All our internal documented policies, procedures, and DPIAs are reviewed annually at the minimum. Staff members are trained and are individually aware of, and how to maintain declared standards |
| **Default settings** | Settings must be ‘high privacy’ by default (unless you can demonstrate a compelling reason for a different default setting, taking account of the best interests of the child). | We do not offer any settings which lower our high level of privacy protection |
| **Data minimisation** | Collect and retain only the minimum amount of personal data you need to provide the elements of your service in which a child is actively and knowingly engaged. Give children separate choices over which elements they wish to activate. | We only collect what is necessary for us to perform our services with our customers |
| **Data sharing** | Do not disclose children’s data unless you can demonstrate a compelling reason to do so, taking account of the best interests of the child. | We do not share children’s personal data |
| Icon  Description automatically generated**Geolocation** | Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation to be switched on by default, taking account of the best interests of the child). Provide an obvious sign for children when location tracking is active. Options which make a child’s location visible to others must default back to ‘off’ at the end of each session | We do not use geolocation  |
| **Parental controls** | If you provide parental controls, give the child age-appropriate information about this. If your online service allows a parent or carer to monitor their child’s online activity or track their location, provide an obvious sign to the child when they are being monitored. | N/A – No parental controls offered |
| **Profiling** | Switch options which use profiling ‘off’ by default (unless you can demonstrate a compelling reason for profiling to be on by default, taking account of the best interests of the child). Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing). | No child’s personal data is used like this |
| **Nudge techniques** | Do not use nudge techniques to lead or encourage children to provide unnecessary personal data or weaken or turn off their privacy protections. | N/A – We do not use nudge techniques for this purpose |
| **Connected toys and devices** | If you provide a connected toy or device, ensure you include effective tools to enable conformance to this code. | N/A |
| **Online tools** | Provide prominent and accessible tools to help children exercise their data protection rights and report concerns. | We publish data subjects’ rights within our [privacy notice](https://idlsgroup.com/privacy-policy) and also have data email for any direct queries.  |

