

Principle	Summary	ARC Maths Response
Best interest 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.	ARC Maths has been designed to support improved educational outcomes for children, in support of the UNCRC (especially Article 29) without compromising the key rights of the child highlighted within this code – especially with regard to privacy.
DPIAs	Undertake a DPIA specifically to assess and mitigate risks to children who are likely to access your service, taking into account differing ages, capacities and development needs. Ensure that your DPIA builds in compliance with this code.	A DPIA has been undertaken, and this response to the Age Appropriate Design Code incorporated.
Age-appropriate application	Consider the age range of your audience and the needs of children of different ages. Apply the standards in this code to all users, unless you have robust age-verification mechanisms to distinguish adults from children.	ARC Maths is specifically aimed at children in secondary education, and designed with that age-range in mind.
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 age of the child. Provide additional specific ‘bite-sized’ explanations about how you use personal data at the point that use is activated.	Clear privacy information has been compiled to inform both direct users of the app, as well as those using it within a school setting (whether at home or in the classroom). Wherever possible clear language is used and where appropriate pupils are directed to contact the school for school-related questions.
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	ARC Maths uses children’s personal data purely to deliver the service and improve their educational outcomes.

	practice, other regulatory provisions or Government advice.	
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 policy documents, including privacy notices and DPIAs are reviewed at least annually and all staff are aware of their obligations to uphold the 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).	No settings are available to lower privacy settings – ARC Maths only processes children's personal data for the purpose of delivering the service.
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.	Only children's personal data required to deliver the service and required outcomes is collected. ARC Maths does collect data on gender, however children are given the option to withhold that information if they wish.
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.	Anonymised data is shared with university researchers to assist in improvements of the app. ARC Education uses a UK based developer to deliver technical support for the app, and they have access to personal data. The developer's act as a sub-processor to Arc Educational under the remit of a valid Data Processing Agreement.
Geolocation	Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation, taking account of the best interests of the child), and provide an	Geolocation is not used.

	<p>obvious sign for children when location tracking is active.</p> <p>Options which make a child's location visible to others must default back to off at the end of each session.</p>	
Parental controls	<p>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.</p>	<p>Parental controls are not required, ARC Maths is specifically aimed at children.</p>
Profiling	<p>Switch options which use profiling off by default (unless you can demonstrate a compelling reason for profiling, 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).</p>	<p>No children's personal data is used for ad-tech profiling.</p>
Nudge techniques	<p>Do not use nudge techniques to lead or encourage children to provide unnecessary personal data, weaken or turn off their privacy protections, or extend their use.</p>	<p>No nudge techniques are used in this way</p>
Connected toys and devices	<p>If you provide a connected toy or device ensure you include effective tools to enable compliance with this code.</p>	<p>Not applicable</p>

Online tools	Provide prominent and accessible tools to help children exercise their data protection rights and report concerns.	Access to rights is either via email (clearly published in the ARC Maths privacy notice) for direct users, or via the school for school users.