

# Children's Code (Age Appropriate Design Code) — self-assessment

**Status:** Complete — all 15 standards assessed; no open gaps. Review annually or on material change. Not legal advice.

| Date       | Reviewer                                                                  |
|------------|---------------------------------------------------------------------------|
| 2026-06-30 | Sole Trader: Spelling Live                                                |
| 2026-10-14 | AK Shah Ltd (Manoj Shah, Director) - re-confirmed on change of controller |

| # | Standard                                      | Status | How / gap                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---|-----------------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Best interests of the child</b><br>primary | ✓      | Product designed for safe learning; child-safe AI guardrail ( <code>lib/child-safety.js</code> ) on every child-facing prompt; no advertising.                                                                                                                                                                                                                                                                                                      |
| 2 | <b>DPIA</b>                                   | ✓      | See <code>docs/compliance/dpia.md</code> — Spelling.Live's own DPIA, completed and approved by the controller (AK Shah Ltd, 2026-10-13); the full text is in the schools data protection pack at <code>/for-schools/trust</code> , written to support a school's own DPIA process.                                                                                                                                                                  |
| 3 | <b>Age-appropriate application</b>            | ✓      | Parent-mediated setup; content tuned per learning band (Early/Fluent). Verified: children cannot self-register — parent creates the profile, and the child-claim flow ( <code>send-child-claim-invite</code> ) enforces <code>owner_id</code> checks. Age-assurance approach is "parent sets up".                                                                                                                                                   |
| 4 | <b>Transparency</b>                           | ✓      | Plain-English privacy policy; AI transparency page ( <code>/ai-transparency.html</code> ) listing each provider and what it receives. A child-accessible blog post ("How We Keep Your Child's Data Safe" at <code>/blog/childrens-data-safety/</code> ) explains in plain language: parent-managed accounts, no AI training, transient photos/voice, one-tap delete.                                                                                |
| 5 | <b>Detrimental use of data</b>                | ✓      | Data used only to deliver/improve practice; <b>not</b> used to train third-party models; no sale of data.                                                                                                                                                                                                                                                                                                                                           |
| 6 | <b>Policies &amp; community standards</b>     | ✓      | Privacy policy + terms upheld; the in-game "Report this" control flags AI-generated content into the standard <code>feedback</code> pipeline (admin-reviewed, email-notified — see <code>js/hints.js</code> <code>reportShownContent()</code> / <code>admin/feedback/index.html</code> ).                                                                                                                                                           |
| 7 | <b>Default settings = high privacy</b>        | ✓      | Private storage buckets; owner-scoped RLS; retention minimised. Handwriting/formation analysis defaults <b>on</b> — justified as part of the learning service parents signed up for (contract basis); parent can toggle off per child. Progress report emails default <b>on</b> with opt-out — parents expect to be kept informed of their child's progress; not enabling by default means unreachable parents who miss important learning updates. |

| #  | Standard                      | Status   | How / gap                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----|-------------------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8  | <b>Data minimisation</b>      | ✓        | Only practice/progress data collected; model-training retention dropped; handwriting thumbnails auto-purged at 90 days (image only, scores kept). PostHog analytics uses anonymous child UUIDs with <code>autocapture: false</code> . Session replay is enabled for <b>parent</b> churn analysis only: <code>mask_all_text</code> + <code>maskAllInputs</code> stay on so every displayed text node and typed value is masked, and a <code>maskTextFn</code> reveals text solely inside <code>.ph-no-mask</code> parent-facing static UI (sign-in, add-child copy) — no child name, practice word, handwriting, or typed input is ever captured. The parent account email is sent as a person property for parent logins only (adult data, to separate real parents from test accounts). The site-search term is recorded on the public help/blog/resources pages only (never in the app a child uses), scrubbed first and withheld if it holds an email, phone number or web address. |
| 9  | <b>Data sharing</b>           | ✓        | Shared only with named processors under DPAs (see ROPA A3 for full list including PostHog); all DPAs accepted (2026-06-30); no third-party marketing sharing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10 | <b>Geolocation</b>            | ✓<br>N/A | No geolocation collected or used.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 11 | <b>Parental controls</b>      | ✓        | Parent dashboard: per-child practice settings, list management, handwriting toggle, guardian invites, reminders (opt-out); export & delete.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 12 | <b>Profiling</b>              | ✓        | Profiling limited to spelling performance to personalise practice/reports; visible to the parent; no opaque external profiling. The AI Spelling Coach's per-child personalisation is the most inference-heavy use: it is gated on the same low-data thresholds as the parent-facing Patterns report (so no confident claim on thin evidence), stored only in the child-scoped <code>child_word_tips</code> (never shared between children), and every tip exposes a "Why this tip?" basis listing the mistakes it was derived from — profiling the parent can inspect and contest. See <code>docs/coach-tips-personalisation.md</code> .                                                                                                                                                                                                                                                                                                                                               |
| 13 | <b>Nudge techniques</b>       | ✓        | No dark patterns pushing children to lower privacy or more data sharing. Verified: coins/points are earned solely through practice gameplay (correct words); they never gate behind data disclosure or privacy-lowering actions. Gamification is learning-focused. Daily practice reminders (native app, 2026-10-12) are off by default, switched on by the parent per child, limited to 06:00-21:59, name no word or score, and skip a day already practised - a parent's routine, not a prompt to extend use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 14 | <b>Connected toys/devices</b> | ✓<br>N/A | Not a connected-device product.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 15 | <b>Online tools (rights)</b>  | ✓        | In-app self-service export and delete (per child and account); support email for any other request.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## Decisions recorded

- **Handwriting analysis default (Standard 7):** ON by default with parent toggle — justified as core learning feature under contract basis. Decided 2026-06-30.

- **Progress report emails (Standard 7):** ON by default with opt-out — parents expect progress updates; defaulting to off risks unreachable parents. Decided 2026-06-30.
- **Processor DPAs (Standard 9):** All accepted 2026-06-30.
- **Google Classroom import (Standards 8 & 12, data minimisation):** the roster import reads a pupil's name and Google user ID only - no email, photo, grades or coursework - and stores the ID purely as a duplicate-prevention key. Pupils are never given a Google identity in the app; the teacher's own Google authorisation is used once and never retained. Decided 2026-09-18.
- **Google Cloud Vision handwriting reading (Standards 8 & 9, 2026-10-04):** behind the opt-in `handwriting_google_reader` flag, the Write it pad's drawn word is read by Google Cloud Vision instead of OpenAI at the standard and strict reading levels. Google receives the image only - no name, account, child ID, stroke data or the expected word - under the existing Google Cloud DPA; images are not retained or used for training. An unsure read asks the child rather than guessing.
- **Wonde school-MIS import (Standards 8 & 12, data minimisation):** reads a pupil's preferred name and Wonde student ID only - no date of birth, UPN, SEN, attendance, contacts or photos - and stores the ID purely as a duplicate-prevention key. The school authorises access in Wonde; a teacher can import only classes the school's records say they teach.

Spelling.Live is operated by AK Shah Ltd (company number 17491910, England and Wales; ICO registration ZC266285).  
 Rendered 2026-10-14 from the maintained source; the current version is always at <https://spelling.live/for-schools/trust>.