

CHILDREN'S CODE STATEMENT

<https://elementalmusic.app>

Elemental is used by students from Key Stage 1 (ages 5 to 7) to Key Stage 5 (ages 16 to 18), so many of our users are children, some under 13. The UK Information Commissioner's [Age Appropriate Design Code](#) (the Children's Code) sets out 15 standards for online services that children are likely to use. This statement explains how Elemental meets each of them.

Children's Code Standards

1. **Best interests of the child.** Elemental exists to help students learn curriculum music. We design features to increase student learning.
2. **Data Protection Impact Assessments.** We carry out a Data Protection Impact Assessment (DPIA) for the processing we are responsible for, including the risks to children, and review it whenever we change how we use students' information. Schools can use our [DPIA Information Pack](#) for their own assessment.
3. **Age appropriate application.** Students range from Year 1 (ages 5 to 6) to Year 13 (ages 17 to 18). Content is matched to the year groups and exam boards each school chooses, primary schools can use a design made for younger students, and we explain how we use students' information in a separate notice written for students.
4. **Transparency.** Our [Privacy Notice for Students](#) explains in plain language what we collect, why, and who can see it. Our full [Privacy Policy](#) and [Cookies Policy](#) give more detail for parents, carers and schools.
5. **Detrimental use of data.** We do not use students' information in ways that could harm them. Elemental has no advertising and no public-facing leaderboards, and the reminders we send are about homework or to encourage regular practice (when a student has not practised on Elemental for a week); these reminders are off by default, and students must explicitly opt in to receive them.
6. **Policies and community standards.** We keep to the commitments in our published policies and in the [Elemental Trust Centre](#). Students cannot post content that other users can see, so there is no student content for us to moderate.
7. **Default settings.** Settings are high privacy by default. Students have no public profile, cannot be found or contacted by other users, and their work is visible only to staff at their own school and, where the school is part of a multi-academy trust, the trust's administrators.
We keep some usage analytics for students on by default for support purposes, allowing us to resolve problems reported by their teachers promptly. Resolving issues promptly ensures student learning is not impacted for longer than is necessary, which is in the best interests of the students. These analytics providers do not receive a student's email address, first name or last name.

8. **Data minimisation.** We collect only the data Elemental needs to provide its features: a student's name and school email address, their classes, and the answers, marks, feedback and progress Elemental creates. We do not ask students for their date of birth, address, phone number or photo. When students use their microphone to sing or play, the sound is checked on their device and only the result is saved. The sound itself is never recorded or sent to us, and these features can be switched off for a school if required.
9. **Data sharing.** We never sell students' information, and we share it only with the trusted sub-processors who help us to run Elemental, who may use it only on our instructions. Statistics we combine across schools are anonymised. Staff at one school cannot see another school's students, except for multi-academy trust administrators who can see students at every school in their trust.
10. **Geolocation.** Elemental does not collect GPS or other precise location data.
11. **Parental controls.** Staff at a student's school can see the student's work and progress, as they would in a classroom, and our Privacy Notice for Students tells students this. Staff can download reports on study usage and performance in a format that could be shared with parents as appropriate. Individual accounts can be linked with a parent account to allow parents to monitor usage and performance directly.
12. **Profiling.** We do not profile students for advertising, marketing or any purpose unrelated to their learning. Intelligent Revision uses a student's answers to choose questions at the right level to support their learning. AI is used only to read scanned paper worksheets, as part of the optional Summational paper-based assessments feature, and teachers can review and change every mark, as explained on our [AI Transparency](#) page.
13. **Nudge techniques.** We do not use design features that encourage students to share more information or weaken their privacy. Our mobile apps send reminders about homework and practice only if the student allows notifications, and students can turn them off at any time in their device's settings.
14. **Connected toys and devices.** Elemental is not a connected toy or device, so this standard does not apply.
15. **Online tools.** Students can ask their teacher or school about their information, or email us at privacy@elementalmusic.app. Where a school is responsible for its students' information, we pass requests to the school and help it respond within 5 business days. Where Elemental is responsible for the information, we respond to the request ourselves.