

Children's Code Compliance Note

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Owner: Andrew James (CEO)

Scope and why this note exists

The Children's Code, formally the Age Appropriate Design Code, is a statutory code of practice setting fifteen standards for online services likely to be accessed by children. The code does not apply to schools processing student data for education. It can, however, apply to an education technology provider whose service is used in or by a school, where that service meets the definition of an information society service. Halved treats the code as applying to its platform and aspires to all fifteen standards as good practice. This note records, proportionately to pilot scale, how Halved meets each standard. It is not a substitute for the school's own duties as controller, with which the best interests standard aligns.

The platform serves secondary students aged eleven to eighteen, provisioned and accessed through the school.

The fifteen standards

#	Standard	Halved position
1	Best interests of the child	The primary design principle. The platform provides learning support, guides students towards answers rather than giving them, and never replaces teachers. A safeguarding pipeline screens for risk and escalates to school staff.
2	Data protection impact assessments	A DPIA is completed for each school deployment through the DPIA Support Pack, covering the processing, risks and mitigations.
3	Age appropriate application	All users are secondary students aged eleven to eighteen, provisioned by the school, so age is established through the school rather than self declaration. The code standards are applied to all users.

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4	Transparency	Privacy information is provided in plain language through the Privacy Policy and the school's AI Student Policy, written to be understood by the age group.
5	Detrimental use of data	Student data is used only to provide learning support. It is not used for advertising, nor in ways known to be detrimental to a child's wellbeing.
6	Policies and community standards	Halved upholds its published governance pack and the school's student policy, including behaviour and acceptable use rules.
7	Default settings	Privacy is high by default. The platform does not seek or require special category data, and processing is limited to what learning support requires. Where Halved asks a question at all, of a student or of a school, the question is fixed-choice and the available answers are set by Halved: students are asked how they prefer to learn and how they approach their work, and schools are asked for year group, reading age and whether the student is working at age expectation in English and in maths. None of these questions asks about health, disability, SEND status, a diagnosis or any other special category of data, and none of them offers a free-text answer. Where a student includes sensitive information in free text or an upload, it is processed only on the school's documented instructions.

#	Standard	Halved position
8	Data minimisation	The learning profile stores observed behaviour as coarse bands, not raw content. Uploaded files are minimised and short lived. For all categories other than the one below, only data needed for the active element of the service is collected. Activity records are the exception to the coarse-band pattern, and are recorded here as an exception rather than presented as though they were not one. The three outputs (total active minutes, the proportion of those minutes spent with Halved's support, and a distribution of when in the day a student works) do not each require second precision, so a record stored to the second is finer than the reporting need. Version 1.4 of this note left open whether a coarser record would serve the same three outputs, and recorded that it was not resolved in Halved's favour. It is now resolved, against the finer record: interval start and end times are truncated to the minute, so that what is stored matches what is reported rather than exceeding it. The length of each interval is a separate matter and is deliberately not coarsened. It is computed before truncation and stored exactly, in seconds. Hourly totals were considered as the coarser alternative and were rejected. A child who works in twelve-minute blocks, which is a real pattern for some students with SEND, disappears into an hourly total and is legible in minute-level intervals; a coarsening that erased how that child actually works would be minimising against the wrong measure, since the purpose of the record is to show a student and their teachers the shape of their own working time. Rounding the lengths themselves would reintroduce a smaller version of that same loss, which is why the truncation is applied to the clock times and not to the durations. Minute precision is the coarsest record of when a student worked that serves the three outputs and still represents that pattern. The truncation is enforced by the database as a constraint on each stored timestamp, rather than by the code that writes it, so it holds against a later endpoint or a direct insert rather than depending on every future writer to apply it. Halved's minimisation position for this category rests on granularity, scope and retention together: clock times held to the minute and enforced there; interval lengths exact; a record holding a start time, an end time, which of six surfaces the student was on and an optional session reference, and holding no content, no location and no device identifier; and a 12-month cap.
9	Data sharing	Children's data is not disclosed beyond the school as controller and the named sub-processors in the Sub-processor Register. All processing is on UK infrastructure.
10	Geolocation	The platform does not track or use student geolocation.

#	Standard	Halved position
11	Parental controls	Access is mediated by the school. Parental engagement runs through the school as controller. The platform does not monitor children covertly, and this standard is met by what the student can see rather than by the absence of any record of use. Everything Halved records about a student is set out in the Privacy Policy and the Data Flow and Data Handling Summary. The category this standard turns on is the activity record: when a student was working, on which surface, and for how long, including evenings and weekends, since Halved does not restrict when a student may use the platform. The student dashboard shows a student their own activity record, including a version of the when-in-the-day view, so that a child can see the same picture of their working time that their teachers see. The sequence is what makes this standard hold, so Halved recorded it in advance as a binding commitment rather than an intention: the timer that creates activity records ships with the student view, not before it. That commitment was met. The timer, the child's own view and the teacher view were released as a single change, so there is no build in which a child's working time is recorded while the child has no way to see it, and the release record evidences the sequence rather than Halved asserting it.

#	Standard	Halved position
12	Profiling	The learning profile and the communication register are profiling solely for learning support, in the child's best interests. The communication register is a coarse language-pitch value (1 to 7) that adjusts the vocabulary and sentence complexity Halved uses; it is a setting for how Halved talks to a child. It is derived from the child's year group, from the reading age the school supplies, and from how the child responds during use. It is not itself a record of ability, attainment or reading age, and it is not a diagnosis or special-category label. The learning profile is likewise built from observed learning behaviour together with the child's own fixed-choice answers about how they prefer to learn and the measures the school supplies; the child's answers to those questions are not shown to teachers. Attainment is recorded separately, as set out in the rest of this row. Band and register numbers are never shown to students. Attainment is recorded as a factual record of performance on work (teacher marks, code-judged answer correctness, and time spent in productive difficulty). It is shown to the student and their teachers as progress over time. It is not used to rank or compare students, is not used for any automated decision about a child, and is not used to infer ability, developmental stage, or any special-category characteristic. Activity records (when a student was working, on which surface, and for how long) are a factual record of use rather than an inference about the student, but Halved treats the reporting of a student's working time and time-of-day pattern as profiling for this standard and applies the same limits: not used to rank or compare students, not used for any automated decision about a child, and not used to infer ability, developmental stage or any special-category characteristic. Profiling is not used for advertising, and outputs are designed not to feed content detrimental to wellbeing.
13	Nudge techniques	The platform does not use nudge techniques to draw out unnecessary personal data or to weaken privacy. Mediated questioning supports learning, it does not extract data.
14	Connected toys and devices	Not applicable. Halved is not a connected toy or internet of things device.
15	Online tools	Data subject rights, including access and erasure, are supported through the school as controller and at dataprivacy@halved.io, with erasure actioned without undue delay and within one month.

Review

This note is proportionate to pilot scale and will be reviewed as the service and its user base grow, and against any updated regulator guidance on the code as it applies to education technology.

Questions about data protection? dataprivacy@halved.io

Website halved.io · students log in at my.halved.io

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