Education Assessment

✓ **Educational value has been assessed**

Comments: (i.e. strengths, limitations, best practice suggestions)

SplashLearns is a game-based platform that targets math content for kindergarten through fifth grade based on US Common Core standards (which differ from the BC curriculum). Teachers can create an account, assign various concepts to either the whole class or individual students, and then track student progress using a detailed reporting system. They can also enable home access so that students can practice at home and their parents can see their progress. In addition to the website, SplashLearn is available as paid app, as well as individual apps split into each grade level. ([Common Sense Media](#))

This PPIA will cite the privacy policy of the web-based version.

Preliminary Privacy Impact Assessment

Digital resource	https://www.splashlearn.com/ Privacy Policy: https://www.splashlearn.com/privacy
Does a PIA exist? (Vendor, ERAC)	no
Is there a 'data link' (e.g.. Pulling PI data from one source to another)?	no
Describe how PI is (requires examining TOU and Privacy Policy)	
Collected What PI data is collected? List all the PI that could be collected from students, teachers, parents through using the service	Teachers will create an account which includes: Name, email, school name, school location. Teacher will create student accounts by including: grade, student first and last name. (It is recommended that teachers use student alias or first name with a number as a last name to protect student identity) Teachers are given the option to share parent emails, so children can access services from home and for parent's to view progress reports. Teachers are not allowed to share personal information including email addresses, but will still be able to use SplashLearns with students in school. Home access can be shared with families using the class code, alias user name and student password. There is an option for students to record their voice, but is not collected and stays on the student's device. Payment information should not be shared for classroom use. Student usage is collected for teacher reports.

	Cookies are collected. Third party Vendors, Advertising and social networks are used to analyze engagement and target advertising to teachers.
Used What is the PI used for? Will PI be used to make decisions that directly affect individuals? Does the company use the PI to advertise its services or those of other companies to students, teachers or parents?	The teacher's data is used for providing the service, sending product updates or notification of new services / features. The student information is for creating student accounts. This information is used to identify students and track progress of assignments completed. Third party Vendors, Advertising and social networks are used to analyze engagement and target advertising to teachers.
Disclosed Who will/can have access (vendor, partners, legal)?	Some anonymized student data may be shared SplashLearns does not sell data to third parties
Secured Measures in place to secure – encryption, passwords, software and platform updates, independent testing for security	Periodic testing, encryption, salted hashing
Stored Where is the data being stored? - What hosting providers are being used? - What hosting region(s) are data being stored in?	USA EU-US -Swiss Privacy Shield
Kept Accurate	Teacher and student data can be updated at anytime when a teacher signs into their account
Retained Expiry, deletion, backup/restore - How are requests made by students, teachers, parents, district staff for data to be: Deleted, Downloaded - What are the retention policies (not, e.g., 1 yr retention if PI used to make decisions that affect individuals)	Personal (teacher) accounts are kept until deleted Classroom accounts are deleted after 2 years of inactivity

RECOMMENDATIONS	COMMENTS
❏ Approve the application/extension with some considerations	The Splash Learns website is recommended for approval with the following considerations: ● Create student accounts using alias or first name only ● Do not share parent email ● Home access may be shared using the class code, student alias and student password on the web-based version (not the app that requires parent sign-in) ● Universal passwords for entire class are discouraged ● Splash Learns is used to complement instruction in Numeracy and is not be be used as the only opportunity for Mathematical thinking ● Be aware of social-emotional factors that accompany students may be assigned tasks that are listed at grade levels different than their own
Date submitted to IT/Privacy: 2021-06-09	Decision / Date: June 28, 2021