

On The Alert!

Date: August 15, 2016
Attention: ASCIP Members
Affected Department(s): Risk Management, Business, and Human Resources
Applicability: K-12 and Community College Districts

Pokémon Go and District Risk

By now, almost everyone has heard of the new [Pokémon Go](#) game. The object of this game is to catch Pokémon within our everyday world. In order to do so, players must physically go to the parks, sidewalks, or other locales where Pokémon can be found. Pokémon Go encourages social interaction with individuals, communities, and institutions, and leverages social networks and gaming to get players to engage with nature and their community.



Less than a month after its release, the first widely known, location-based, augmented reality game has over 30 million players worldwide. It has been both praised and blamed for its impacts on the larger world. Some players with depression and social anxiety claim the game has helped them get outside and meet new people. Other players have suffered various accidents related to the game mainly due to being distracted and unaware of their surroundings (e.g., people, hazards, obstructions). Police departments in various countries have issued warnings to players regarding inattentive driving, trespassing, and being targeted by criminals, wherein perpetrators entrap players by planting Pokémon in isolated places.

More recently, the [Electronic Privacy Information Center](#) (EPIC) has expressed serious concerns to the Federal Trade Commission (FTC) about the game's aggressive and, perhaps, unprecedented use of personal information. Unlike Twitter, Facebook, or Netflix, the app requires uninterrupted use of its users' locations and cameras. The FTC is being asked to investigate the software developer's (Niantic) collection and retention of data practices and whether they violate privacy protection requirements.

The potential risk to districts concerns distracted players trespassing on district property to play the game, as well as the attractive nuisance aspects of the game (i.e., some Pokémon "reside" on equipment, trees, or other potentially dangerous locations).

ASCIP recommends that districts consider adopting a board policy banning the playing of Pokémon Go or other augmented reality games on district property or grounds. Additionally, information technology personnel should be consulted on minimizing impacts to bandwidth and vulnerabilities to the district's network.

ASCIP will continue to monitor developments with risks and privacy issues and provide additional recommendations accordingly.

Link: FTC Letter: <https://epic.org/privacy/ftc/FTC-letter-Pokemon-GO-07-22-2016.pdf>

Please contact your ASCIP risk services consultant at (562) 404-8029 to discuss further.