

## Our key areas of focus for the Regulatory Sandbox 2020-2021

### **Innovations related to the Age Appropriate Design Code**

With the Age Appropriate Design Code coming into force on 2 September 2020, ahead of a 12 month transition period, the ICO is keen to work directly with innovators through the Regulatory Sandbox. This will involve hands-on, intensive ICO support to the development of your product or service which has direct relevance to the rights and freedoms of children and young people online.

Our aim is not to keep young people out of the digital world, but to protect and empower them within it. We want to enable young people to assert and be aware of their rights, whilst simultaneously protecting them by embedding data protection safeguards into products and services at the design stage. By working with organisations on relevant products and services, we want to explore specific issues innovators are faced with, to help inform further guidance and practical tools. We aim to support the industry in understanding 'what good looks like' when implementing the Code, particularly for smaller organisations with limited resources.

Ultimately, our Regulatory Sandbox aims to support innovators to improve confidence amongst children, young people and their parents and carers that their personal information is being properly protected when they are engaging with digital services. This includes making sure that they are receiving an age-appropriate experience and their data automatically has the highest level of protections. We would be interested in hearing from innovators who would like to work with us to ensure the best possible standards in age appropriate design, and who are focusing on issues posed by implementation of the Code.

We welcome any applications in this area but are particularly interested in the following areas of age appropriate design:

- Age appropriate privacy information, including tailoring the right to be informed to different age groups, to enable transparency and understanding whilst not undermining the user experience.
- How to provide age appropriate privacy information via connected toys and devices (where there is no screen).
- Applications to enable increased control of personal data within connected toys.
- Exploring systems to secure in-game communications between players to protect children from unwanted intrusions or a risk of grooming.

- Exploring how to convey the best interests of the child or young person, and other AADC considerations within a data protection impact assessment ('DPIA').
- Use of geolocation technology involving children and young peoples' whereabouts, including in relation to COVID-19 tracking.

### **Innovations related to data sharing, particularly in the areas of health, central government, finance, higher and further education or law enforcement**

Compliant data sharing is crucial to the operation of modern economies. It can also help protect the health and security of our citizens and promote research and innovation.

As such, we are looking to use our Regulatory Sandbox to work directly with innovators developing products and services that support complex data sharing in the public interest, to help them attain compliance.

Our aim is to promote and enable confident, responsible and lawful data sharing in the wider public interest. In particular, the Sandbox aims to help demonstrate that data protection legislation is not a barrier to proportionate sharing of personal data.

Whilst we are open to any proposals on how to meet that wider aim, we would be particularly interested in hearing from innovators working in or with the health, central government, finance, higher and further education or law enforcement sectors. We want to hear from you if you are developing products or services which are likely to enable substantial public benefits, but where data sharing may, for example:

- pose the highest risk to the public and to information rights;
- involve the use of novel or innovative technologies;
- involve the use of innovative data governance frameworks or data sharing platforms; and
- involve the processing of sensitive personal data.