



Information Commissioner's Office

Consultation: Age appropriate design code

Introduction

The Information Commissioner is seeking feedback on her draft code of practice Age appropriate design: a code of practice for online services likely to be accessed by children (the code).

The code will provide guidance on the design standards that the Commissioner will expect providers of online 'Information Society Services' (ISS), which process personal data and are likely to be accessed by children, to meet.

The code is now out for public consultation and will remain open until 31 May 2019. The Information Commissioner welcomes feedback on the specific questions set out below.

For this consultation, we will publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (e.g. a member of the public or a parent). All responses from organisations and individuals responding in a professional capacity (e.g. academics, child development experts, sole traders, child minders, education professionals) will be published. We will remove email addresses and telephone numbers from these responses but apart from this, we will publish them in full.

For more information about what we do with personal data please see our privacy notice.

Please note, we are using the platform Snap Surveys to gather this information. Any data collected by Snap Surveys for ICO is stored on UK servers. You can read their Privacy Policy [here](#).

Section 1: Your views on the code

Is the 'About this code' section clearly communicated?

Q1

Yes

No

If no, then please provide your reasons for this view.

Q1a

Is the 'Services covered by this code' section clearly communicated?

Q2

Yes

No

If no, then please provide your reasons for this view.

Q2a

Section 2: Your views on the draft standards

There are 16 draft standards in the code. You can comment on all the drafts standards, or focus on a single standard. If you do not want to answer questions on a standard please press skip.

The standards are:

- 1) Best interests of the child
- 2) Age Appropriate Application
- 3) Transparency
- 4) Detrimental use of data
- 5) Policies and community standards
- 6) Default settings
- 7) Data minimisation
- 8) Data sharing
- 9) Geolocation
- 10) Parental Controls
- 11) Profiling
- 12) Nudge techniques
- 13) Connected toys and devices
- 14) Online tools
- 15) Data protection impact assessments
- 16) Governance and accountability

Best interests of the child: The best interests of the child should be a primary consideration when you design and develop online services likely to be accessed by a child.

- Q3 I would like to comment on this standard
 Skip

Have we communicated our expectations for this standard clearly?

Q4

Yes

No

If no, then please give reasons for your answer.

Q4a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q5

Yes

No

If yes, then please give reasons for your answer.

Q5a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q6 Yes
 No

If yes, then please give reasons for your answer.

- Q6a "The best interests of the child should be a primary consideration when you design and develop online services likely to be accessed by a child." There are lots of websites, such as news and media websites, who would have to consider making substantial changes to their editorial output if they have have the interests of children as a primary concern, just because children may access these sites, even if they are not the intended audience.

Do you envisage any feasibility challenges to online services delivering this standard?

- Q7 Yes
 No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

- Q7a News and media websites could become tailored to an untargeted under 18s audience, rather than a grown-up adult audience simply because they are likely to be accessed by children and by having to consider the needs of children who may or may not be accessing their content, when they are not even an intended audience. These guidelines should be primarily focused on websites that are aimed at children, not capturing the entire output of the internet.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q8 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

- Q8a The entire output of the digital creative industry would need to be reviewed and changed if these guidelines would be implemented, this would take much longer than three months.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q9 Yes
 No

If yes, then please provide details (including links).

Q9a

Age-appropriate application: Consider the age range of your audience and the needs of children of different ages. Apply the standards in this code to all users, unless you have robust age-verification mechanisms to distinguish adults from children.

- Q10 I would like to comment on this standard
 Skip

Have we communicated our expectations for this standard clearly?

Q11 Yes

No

If no, then please give reasons for your answer.

Q11a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q12 Yes

No

If yes, then please give reasons for your answer.

Q12a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q13 Yes
 No

If yes, then please give reasons for your answer.

- Q13a The code suggests that all ISS service providers whose sites are “likely to be accessed by children” must provide a child-appropriate service to all users by default, with the option for adults to opt-out of this if they can verify their age (p.24). The requirements set out in the code on profiling and data sharing (see below), mean that it will either not be technically possible, or commercially viable, for many organisations to do this. The code notes that organisations must apply the standards to all users, unless there are robust age verification measures in place, and that self-declaration of age will not be sufficient for this purpose. The code itself notes that there are limited services currently available to assist with this. Organisations will, as a result, need to collect large amounts of additional, often highly sensitive, information, such as official identity documents solely for the purpose of meeting ICO guidance. The code notes, briefly and in passing, that organisations maintain a responsibility for security and privacy by design. It is not clear that the risks which the code seeks to mitigate need to be addressed by such an extensive processing of high risk documentation: there could still be a place for self-declared age verification, particularly for ISS less likely to attract children or where such services otherwise pose a low risk. It is inappropriate for the ICO to be promulgating a code which poses a security (and privacy by design) risk, which could be avoided by a more carefully considered approach.

Do you envisage any feasibility challenges to online services delivering this standard?

- Q14 Yes
 No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

- Q14a Some services may be suitable for older children, but not for younger children – such as certain online games, social media platforms or even new sites - but that current approaches to age verification all depend either on providing documentation only available to those over 18 (credit card number) or on providing identity documents (passport) which not all children will have and which run the risk of excluding certain socioeconomic groups. The requirement to verify age, in this context, will be impossible to implement.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q15 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

- Q15a If any such prescriptive requirements will be imposed, a much longer implementation period than 3 months will be required to ensure that more substantial design changes can be met.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q16 Yes
 No

If yes, then please provide details (including links).

Q16a

Transparency: The privacy information you provide to users, and other published terms, policies and community standards, must be concise, prominent and in clear language suited to the age of the child. Provide additional specific 'bite-sized' explanations about how you use personal data at the point that use is activated.

- Q17 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q18 Yes
 No

If no, then please give reasons for your answer.

Q18a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q19 Yes

No

If yes, then please give reasons for your answer.

Q19a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q20 Yes
 No

If yes, then please give reasons for your answer.

- Q20a The code states that organisations should provide: · privacy information and terms of service in child friendly language – where these deliver legally necessary language, then supplements should be used · notices on a just in time basis · multiple versions of their notice which are suitable for each age group – and, given the requirement to allow upward and downward movement between ages, for varying educational levels - as described in the code · non-traditional media for all age groups including the oldest children, such as cartoons, diagrams, graphics and video to ensure content is child friendly. The inclusion of specific “suggestions” by age is prescriptive, especially by content producers who may feasibly attract children of multiple ages to their sites. These proposed standards do not acknowledge the difficulty in assessing what age group a particular user may fall into (for the reasons set out above on age-verification, there may be no good way to determine the age or educational level of a child). It is important to take a risk-based approach to creating multiple privacy resources when too wide a range might cause unnecessary confusion. There were also concerns over the potential time and cost both in creating relevant materials and making changes to user interfaces and functionality of services so as to allow the information to be displayed in a manner set out in the code. If the ICO intends to retain specific suggestions by age group, it should take care to better acknowledge that these are not considered minimum expectations, and thought should be given on how ISS providers can be directed to meet the code’s requirements if multiple age groups may use the service.

Do you envisage any feasibility challenges to online services delivering this standard?

- Q21 Yes
 No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

- Q21a Separate privacy information for different age groups, for news and media websites where the audience is not intended to be children, but they may access it is unfeasible, as the sites would need to identify the age of the person to present the correct information.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q22 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

- Q22a If any such prescriptive requirements will be imposed, a much longer implementation period than 3 months will be required to ensure that more substantial design changes can be met.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q23 Yes
 No

If yes, then please provide details (including links).

Q23a

Detrimental use of data: Do not use children's personal data in ways that have been shown to be detrimental to their wellbeing, or that go against industry codes of practice, other regulatory provisions or Government advice.

- Q24 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q25 Yes
 No

If no, then please give reasons for your answer.

Q25a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q26 Yes

No

If yes, then please give reasons for your answer.

Q26a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q27 Yes

No

If yes, then please give reasons for your answer.

Q27a

Do you envisage any feasibility challenges to online services delivering this standard?

Q28 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q28a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q29 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q29a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q30 Yes
 No

If yes, then please provide details (including links).

Q30a

Policies and community standards: Uphold your own published terms, policies and community standards (including but not limited to privacy policies, age restriction, behaviour rules and content policies).

- Q31 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q32 Yes
 No

If no, then please give reasons for your answer.

Q32a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q33 Yes

No

If yes, then please give reasons for your answer.

Q33a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q34 Yes

No

If yes, then please give reasons for your answer.

Q34a

Do you envisage any feasibility challenges to online services delivering this standard?

Q35 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q35a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q36 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q36a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

Q37 Yes

No

If yes, then please provide details (including links).

Q37a

Default settings: Settings must be 'high privacy' by default (unless you can demonstrate a compelling reason for a different default setting, taking account of the best interests of the child).

Q38 I would like to respond to this standard

Skip

Have we communicated our expectations for this standard clearly?

Q39 Yes

No

If no, then please give reasons for your answer.

Q39a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q40 Yes

No

If yes, then please give reasons for your answer.

Q40a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q41 Yes

No

If yes, then please give reasons for your answer.

Q41a

Do you envisage any feasibility challenges to online services delivering this standard?

Q42 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q42a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q43 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q43a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q44 Yes
 No

If yes, then please provide details (including links).

Q44a

Data minimisation: Collect and retain only the minimum amount of personal data you need to provide the elements of your service in which a child is actively and knowingly engaged. Give children separate choices over which elements they wish to activate.

- Q45 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q46 Yes
 No

If no, then please give reasons for your answer.

Q46a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

- Q47 Yes
 No

If yes, then please give reasons for your answer.

Q47a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q48 Yes
 No

If yes, then please give reasons for your answer.

Q48a This guidance contradicts the requirements for age verification, news and media websites that at the moment may only be collecting IP addresses and device IDs would need to be much more intrusive and require highly sensitive special categories of data just to verify the age of their audience. This carries any number of risks and unintended consequences.

Do you envisage any feasibility challenges to online services delivering this standard?

- Q49 Yes
 No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

- Q49a it is not feasible to have guidance required websites to have a principle of data minimisation and then at the same time require them to collect data to robustly verify people's age.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q50 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

- Q50a Implementation of the standards set out in the code will require substantial operational, technical and design changes. Furthermore, it may require the engagement of third parties. As a result, a transition period of three months will not be sufficient.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q51 Yes
 No

If yes, then please provide details (including links).

Q51a

Data sharing: Do not disclose children's data unless you can demonstrate a compelling reason to do so, taking account of the best interests of the child.

- Q52 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q53 Yes
 No

If no, then please give reasons for your answer.

Q53a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q54 Yes

No

If yes, then please give reasons for your answer.

Q54a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q55 Yes
 No

If yes, then please give reasons for your answer.

- Q55a The code suggests that organisations can only share personal data if they can demonstrate a "compelling reason to do so, taking into account the best interests of the child". The code gives the example of safeguarding or preventing or detecting crimes against children as a compelling interest. This clearly sets a very high bar. This barrier to sharing data is not present in, or required by, the GDPR or the DPA 2018, where the relevant consideration would largely be whether there is a lawful basis for the processing . The underlying assumption for this section of the code is that "sharing children's personal data with third parties... can expose children to additional risks beyond those inherent in your own processing". The fact that another organisation is undertaking processing does not inherently represent an increase in risk: indeed, another organisation may be better placed to carry out some processing, yet the code would preclude this, absent compelling reasons such as prevention and detection of crime. This current drafting would restrict their ability to use processors to perform services for them. In addition, for corporate groups, multiple entities in the group will work together, across legal entities, to support a particular online product or service. The code would seem to restrict this and require services to be restructured with duplication of effort and teams. The impact of the code here is disproportionate to the disruptive effect it will produce. If the intention of the code is to limit sharing between controllers only, this should be made clear. The code should also allow controllers to make their own assessments on the risk of data sharing, rather than dictating that all sharing is high risk unless for reasons focussed on a child's welfare. The code also notes that "selling on children's personal data for commercial re-use" is unlikely to amount to a compelling reason. It is not clear what types of activities this is intended to cover. Potentially, the statement could apply to use of targeted advertising online, where information is shared with ad-tech companies, and hence to multiple online services where ad-revenue is a main (or sole) source of revenue for the service. Anyone providing online services designed for a "general audience" - i.e. the site is not designed for children, but it is likely that some children (especially teens) do access the site. This would be true for music sites, film sites, online games (other than games which are specifically for over 18s)

Do you envisage any feasibility challenges to online services delivering this standard?

Q56 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q56a The revenue from tailored ads is significantly higher than that from contextual ads. This restriction will have a direct impact on the revenues of these services and as a result, certain services may no longer be commercially viable. This could ultimately result in a reduction of the content available to individuals under the age of 18, as companies may decide to restrict access to such services to ensure that they can remain commercially viable. Such an effect has already been seen on some news sites outside the EU which now block EU users due to perceived complexity of GDPR & cookie-compliance. This could lead to a loss of access to information and culture, impacting on a child's rights to receive information and increasing risks that children either seek out rogue ISS choosing to ignore the code, or that they become unprepared for the adult online world they would inevitably meet on turning 18. The ICO should consider a risk-led approach to age-verification and other obligations in the code to help avoid the potential that children's access is simply switched off when such tools are used. The ICO should reconsider why it considers data sharing to pose a risk per-se. The section should then be redrafted so that it seeks to mitigate a clearly articulated & substantiated risk and does not impose restrictions which are disproportionate to the benefit to be achieved.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q57 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

- Q57a Implementation of the standards set out in the code will require substantial operational, technical and design changes. Furthermore, it may require the engagement of third parties. As a result, a transition period of three months will not be sufficient.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q58 Yes
 No

If yes, then please provide details (including links).

Q58a

Geolocation: Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation, taking account of the best interests of the child), and provide an obvious sign for children when location tracking is active. Options which make a child's location visible to others must default back to off at the end of each session.

- Q59 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

Q60 Yes

No

If no, then please give reasons for your answer.

Q60a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q61 Yes

No

If yes, then please give reasons for your answer.

Q61a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q62 Yes

No

If yes, then please give reasons for your answer.

Q62a

Do you envisage any feasibility challenges to online services delivering this standard?

Q63 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q63a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q64 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q64a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q65 Yes
 No

If yes, then please provide details (including links).

Q65a

Parental controls: If you provide parental controls give the child age appropriate information about this. If your online service allows a parent or carer to monitor their child's online activity or track their location, provide an obvious sign to the child when they are being monitored.

- Q66 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

Q67 Yes

No

If no, then please give reasons for your answer.

Q67a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q68 Yes

No

If yes, then please give reasons for your answer.

Q68a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q69 Yes

No

If yes, then please give reasons for your answer.

Q69a

Do you envisage any feasibility challenges to online services delivering this standard?

Q70 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q70a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q71 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q71a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q72 Yes
 No

If yes, then please provide details (including links).

Q72a

Profiling: Switch options which use profiling off by default (unless you can demonstrate a compelling reason for profiling, taking account of the best interests of the child). Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing).

- Q73 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

Q74 Yes

No

If no, then please give reasons for your answer.

Q74a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q75 Yes

No

If yes, then please give reasons for your answer.

Q75a

Do you think this standard gives rise to any unwarranted or unintended consequences?

- Q76 Yes
 No

If yes, then please give reasons for your answer.

- Q76a As the code notes on p.63, profiling can be used for a wide range of purposes. Those mentioned in the code of relevance lots of media owners include: suggesting content; frequency capping (of display of content or ads); and targeted advertising. The code states that profiling should, by default, be turned off unless there is a compelling reason. The examples given of compelling interest on p.64 are child protection and safeguarding. The code also suggests that separate options should be given for each use of profiling – presumably, separate options for each of the purposes above. Delivery of content which is based on a profile is an important part of many information society services offered by our media owners who primarily have adult audiences that children (mainly 13-18) may legitimately access such as news websites. In the case of gaming, information about the player's performance, scores, purchases and interests will be used to generate new levels of a game, or challenges or purchases which will enhance the player's experience. Companies may not be able to provide certain games without profiling and in others, producing a version without profiling would be at the expense of player satisfaction (and fairness, given that such personalisation can allow players to gain "for free" based on loyalty and engagement in place of real-world payment). In the case of film studios or music labels, information about content which a visitor to the site has found of interest may be used by the studio or label to suggest similar content – either on that site, or on other sites. Feedback from clients was that if general ads or content are served, then this may lead to content being promoted which is less suitable for the audience and some clients had experienced complaints arising out of this situation, for example films for an older audience being displayed instead of a targeted advert suitable for a child. In each of the above examples, it will be difficult for companies to show that there is a "compelling reason" for this type of personalisation, given the illustrations at p.64. This may result in information society services being restricted to over 18s in situations when they would not otherwise need to be so restricted, with the risks of limited access highlighted previously. Alternatively this could lead to children being presented with multiple requests to permit profiling: a consent to personalise content recommended in the service, another consent to personalise content shown on other

Do you envisage any feasibility challenges to online services delivering this standard?

Q77 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q77a As described above.

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q78 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q78a Implementation of the standards set out in the code will require substantial operational, technical and design changes. Furthermore, it may require the engagement of third parties. As a result, a transition period of three months will not be sufficient.

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q79 Yes
 No

If yes, then please provide details (including links).

Q79a

Nudge techniques: Do not use nudge techniques to lead or encourage children to provide unnecessary personal data, weaken or turn off privacy protections, or extend use.

- Q80 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q81 Yes
 No

If no, then please give reasons for your answer.

Q81a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q82 Yes

No

If yes, then please give reasons for your answer.

Q82a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q83 Yes

No

If yes, then please give reasons for your answer.

Q83a

Do you envisage any feasibility challenges to online services delivering this standard?

- Q84 Yes
 No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q84a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

- Q85 Yes
 No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q85a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q86 Yes
 No

If yes, then please provide details (including links).

Q86a

Connected toys and devices: If you provide a connected toy or device ensure you include effective tools to enable compliance with this code

- Q87 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q88 Yes
 No

If no, then please give reasons for your answer.

Q88a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q89 Yes

No

If yes, then please give reasons for your answer.

Q89a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q90 Yes

No

If yes, then please give reasons for your answer.

Q90a

Do you envisage any feasibility challenges to online services delivering this standard?

Q91 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q91a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q92 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q92a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

Q93 Yes

No

If yes, then please provide details (including links).

Q93a

Online tools: Provide prominent and accessible tools to help children exercise their data protection rights and report concerns.

Q94 I would like to respond to this standard

Skip

Have we communicated our expectations for this standard clearly?

Q95 Yes

No

If no, then please give reasons for your answer.

Q95a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q96

Yes

No

If yes, then please give reasons for your answer.

Q96a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q97

Yes

No

If yes, then please give reasons for your answer.

Q97a

Do you envisage any feasibility challenges to online services delivering this standard?

Q98

Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q98a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q99

Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q99a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

Q100 Yes

No

If yes, then please provide details (including links).

Q100a

Data protection impact assessments: Undertake a DPIA specifically to assess and mitigate risks to children who are likely to access your service, taking into account differing ages, capacities and development needs. Ensure that your DPIA builds in compliance with this code.

Q101 I would like to respond to this standard

Skip

Have we communicated our expectations for this standard clearly?

Q102 Yes

No

If no, then please give reasons for your answer.

Q102

a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q103 Yes

No

If yes, then please give reasons for your answer.

Q103

a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q104 Yes

No

If yes, then please give reasons for your answer.

Q104

a

Do you envisage any feasibility challenges to online services delivering this standard?

Q105 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q105

a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q106 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q106

a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

- Q107 Yes
 No

If yes, then please provide details (including links).

Q107
a

Governance and accountability: Ensure you have policies and procedures in place which demonstrate how you comply with data protection obligations, including data protection training for all staff involved in the design and development of online services likely to be accessed by children. Ensure that your policies, procedures and terms of service demonstrate compliance with the provisions of this code

- Q108 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q109 Yes
 No

If no, then please give reasons for your answer.

Q109
a

Do you have any examples that you think could be used to illustrate the approach we are advocating to this standard?

Q110 Yes

No

If yes, then please give reasons for your answer.

Q110

a

Do you think this standard gives rise to any unwarranted or unintended consequences?

Q111 Yes

No

If yes, then please give reasons for your answer.

Q111

a

Do you envisage any feasibility challenges to online services delivering this standard?

Q112 Yes

No

If yes, then please provide details of what you think the challenges are and how you think they could be overcome?

Q112

a

Do you think this standard requires a transition period of any longer than 3 months after the code comes into force?

Q113 Yes

No

If yes, then please provide your reasons for this view, and give an indication of what you think a reasonable transition period would be and why.

Q113

a

Do you know of any online resources that you think could be usefully linked to from this section of the code?

Q114 Yes

No

If yes, then please provide details (including links).

Q114

a

Section 3: Your views on the code sections

Is the '**Enforcement of this code**' section of the code clearly communicated?

Q115 Yes

No

If no, then please provide your reasons for this view.

Q115

a

Is the '**Glossary**' section of the code clearly communicated?

Q116 Yes

No

If no, then please provide your reasons for this view.

Q116

a

Are there any key terms missing from the '**Glossary**'?

Q117 Yes

No

If yes, then please provide your reasons for this view.

Q117

a

Is the '**Annex A: Age and developmental stages**' section of the code clearly communicated?

Q118 Yes

No

If no, then please provide your reasons for this view.

Q118

a

Is there any information that you think needs to be changed in the **Annex A: Age and developmental stages'** section of the code?

Q119 Yes

No

If yes, then please provide your reasons for this view.

Q119

a

Do you know of any online resources that could be usefully linked to the **'Annex A: Age and developmental stages'** section of the code?

Q120 Yes

No

If yes, then please provide details (including links).

Q120

a

Is the '**Annex B: Lawful basis for processing**' section of the code clearly communicated?

Q121 Yes

No

If no, then please provide your reasons for this view.

Q121

a

Is the '**Annex C: Data Protection Impact Assessment**' section of the code clearly communicated?

Q122 Yes

No

If no, then please provide your reasons for this view.

Q122

a

Do you think any issues raised by the code would benefit from further (post publication) work, research or innovation?

Q123 Yes

No

If yes, then please provide your reasons for this view.

Q123

a

Section 4: About you

Are you answering as:

- Q124
- A body representing the views or interests of children
 - A body representing the views or interests of parents
 - A child development expert
 - An academic
 - An individual acting in another professional capacity
 - A provider of an ISS likely to be accessed by children
 - A trade association representing ISS providers
 - An individual acting in a private capacity (e.g. someone providing their views as a member of the public of the public or a parent)?
 - An ICO employee
 - Other

Please specify:

Q124 a Data Governance Practitioner for a large publishing company

a

Please specify:

Q124

b

Please state your name or if you're answering on behalf of an organisation, your organisation's name.

Q125 Condé Nast Britain

Thank you for responding to this consultation
We value your input.