



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 The definition is so broad it covers almost any electronic device, even internet controlled lightbulbs or TV sets that support nothing more than internet updating.

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

It leads to a series of unintended and bad consequences. 1. The fact that non-UK resident bodies are not covered means that it will encourage vendors with a small UK presence to leave the UK cutting the tax base, reducing service quality and employment. 2. It adds to the burden of designing (and major redesign) of web sites so there is a large commercial cost which is likely to be met in many cases by simply prohibiting anyone under 18, or by closing down and moving to amazon and other major sites, harming profitability and increasing the control a tiny number of massive, low tax paying US companies have on the UK 3. It assumes we will remain in the EU with its focus on GDPR one stop shop. The EU has been fairly clear that when/if the UK leaves the arrangements will no longer apply without an agreement. That represents a huge risk of driving even more business out of the UK 4. In the case of apps, it is likely that compliance cost for older apps will result in many vendors just marking them in web stores as 'not available in the UK'.

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

1. Timescale. - A lot of services already exist and updating them to meet these standards will take many months of programming work. Quite a few services are no longer actively modified but just maintained. In those cases it will be necessary to re-commence work, or just shut down the product in the UK. That in some cases will result in customers losing things like games and rights managed access to books and music - For devices with an online element the software is often burned into the product and cannot be updated easily. In some cases regulatory compliance is also very very slow. A good example is in car entertainment systems that talk to 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 For 'new' services it probably needs to be a year or so (that being a typical development cycle for things like a new game). Many existing services could probably be updated in the one year timescale (or could bar anyone under 18 or from the UK within that timescale). A lot of existing appliances that are internet connected and may fall into the category - eg because they offer updates or things like online streaming within a product may well not be upgradable to meet such a regulation - ever.

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 There are no working robust age verification mechanisms on the internet. This is a fiction, we know this from the pornography situation and everything that has been tried.

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 It places an enormous regulatory burden upon UK small businesses that will simply drive all e-commerce onto large US low tax paying sites to the detriment of the UK as a place to do business and to the UK tax take. The standard is simply too high because of the lack of effective age verification, and the lack of definition of what is robust within the guidance. For sites targetted at children the policy is reasonable but children could access any site.

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 1. 'robust' is not defined 2. It's over-inclusive 3. The timescale of 3 month is impossible

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 As described under 'Best Interests of the Child'

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 As described under 'Best Interests of the Child' - it will drive everything onto a small number of large US platforms that can handle compliance costs, reduce profitability of UK small business and the UK tax take.

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 The age of the potential child is unknown. There is no valid robust age verification system on the internet. In addition a lot of sites do not want to know the age of their users as that is collecting personal data they currently have no need to do so. Thus compliance will require every site asks and stores the users age related data. It requires significant redesign of application user interfaces which takes a lot of time to test and roll out. In many cases it will not be commercially viable so the application will simply get blocked from the UK

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 1. Privacy documents require legal review. For a small business this is expensive and very very slow. 2. It requires significant redesign of application user interfaces which takes a lot of time to test and roll out. In many cases it will not be commercially viable so the app will take time to update. A year is probably the minimum reasonable time to update a complex web site or application 3. There are many existing internet connected devices that cannot be remotely updated and brought into compliance.

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 Your compliance requires robust age verification and forces sites to ask age data, and for other personal data in order to verify ages. That creates another giant pool of personal data that most smaller sites today do not collect, do not want to collect and in truth we all know do not have the security competence to store safely.

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 The fact that the code would require collection of quantities of excessive personal data to even be in compliance.

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 As stated in all the other answers it takes a long time to update applications or websites, in some cases it will not be possible

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 The highest privacy level would be not collecting age data. However your compliance requires robust age verification so this contradicts your own requirements.

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 The fact that high privacy and age verification are fundamentally contradictory requirements

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 It's not possible to comply with both these rules. No transition period would be too long enough.

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 Robust age verification is in direct contradiction to data minimization. The need to know the age of the user in order to present privacy data is in direct contradiction to this requirement. Forcing the collection of more data by small businesses guarantees an endless stream of leaks and security failures.

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 The parts of the proposal are in direct conflict with one another. It is not possible to do true data minimization when you are required to do age related processing.

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 It is not possible to meet this standard and the rules on age. No transition period is long enough

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

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

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 Software and processes take longer than 3 months to update. Some devices may never be able to reach the standard required

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 Software and processes take longer than 3 months to update. Some devices may never be able to reach the standard required. In this particular category some of the e-tracking watches come to mind.

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 Giving the user a canary that allows them to ascertain if/when they are being monitored also allows them to use it as a key to identify whether their attempts to break/hack/disable the monitoring are working. That represents a difficult balance. Compliance is also a challenge for existing devices and old software and it may be the only way to get compliance is to remote kill childrens toys that would otherwise work fine, and disable apps from UK availability.

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 The standard does not consider non visual devices, not does it consider blind users and accessibility software. Making the information available on such things is extremely hard, especially for small children who may not read. Consider for example how an internet baby alarm would communicate to a baby that it is being monitoring in a way the child understands. Now do that for an existing product where there is no functionality available to meet compliance. Similar problems exist for most speech communicating devices and toys.

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 Existing devices in many cases could not be retrofitted. Others will take longer as the process to update them is not trivial. Realistically for devices this needs to be a code for new products or for updates to existing ones where practicable.

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

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

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 Devices and software take at least a year to do a full update cycle. In addition some of them may never be updatable sufficiently.

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 It is difficult to imagine how many existing toys could be remote updated to comply with this standard. Having a set of rules backed by a large financial threat is asking companies to remote kill childrens toys to avoid risk. That is *not* a good thing. Certainly anything new ought to compliant within a year, but it is difficult to see how some existing products could ever become so. Possibly there needs to be a different process for such products where, as far as feasible, the vendor is instead required to notify the purchaser of the non-compliance elements and the fact they cannot be retro-fitted.

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

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.

- 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 Again this will drive businesses onto the large US platforms in order to avoid compliance costs. Much more clarity is needed. An explanation of how a site is magically going to discover the owners age is needed. Compliance is likely to lead to many vendors simply killing services and products in the UK. Children will find their games vanished from their computers for example.

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 The privacy and data collection minimisation requirements fundamentally conflict with the requirement to provide age specific responses and behaviour. At minimum the guidance needs to say something like "A site or service that is not intended for children, and does not otherwise collect age data may assume that anyone visiting it is at least ten years old and must show suitability guidance appropriate for the 10+ age range." In essence there needs to be a clear divide between 'incidentally visited by children' (such as most small business sites) and 'intended for/likely to attract children', where more specific regulation is appropriate. You could for example imagine an appropriate 10+ message explaining that the site is for adults purchasing products, asking if you are 18+ and explaining personal data usage. Even on many child friendly asking and storing ages is in many cases needlessly invasive and guidance on providing wide range appropriate information instead of narrow age

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 It takes along time to retrofit existing sites. Products may not be able to reach the new standards. A year is the minimum timescale for much of this, and for many products it will not be possible.

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

- Q100 Yes
 No

- Q100 If yes, then please provide details (including links).

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

- Q101 I would like to respond to this standard
 Skip

Have we communicated our expectations for this standard clearly?

- Q102 Yes
 No

- Q102 If no, then please give reasons for your answer.

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

Q103 If yes, then please give reasons for your answer.
a

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

- Q104 Yes
 No

Q104 If yes, then please give reasons for your answer.
a

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

- Q105 Yes
 No

Q105 If yes, then please provide details of what you think the challenges are and how you think they could be overcome?
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

Q106 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.
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

Q107 If yes, then please provide details (including links).
a

Section 3: Your views on the code sections

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

Q108 Yes

No

Q108 If no, then please provide your reasons for this view.

a

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

Q109 Yes

No

Q109 If no, then please provide your reasons for this view.

a

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

Q110 Yes

No

Q110 If yes, then please provide your reasons for this view.

a

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

Q111 Yes

No

Q111 If no, then please provide your reasons for this view.

a

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

Q112 Yes

No

Q112 If yes, then please provide your reasons for this view.

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?

Q113 Yes

No

Q113 If yes, then please provide details (including links).

a

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

- Q114 Yes
 No

Q114 If no, then please provide your reasons for this view.
a

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

- Q115 Yes
 No

Q115 If no, then please provide your reasons for this view.
a

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

- Q116 Yes
 No

Q116 If yes, then please provide your reasons for this view.

a Guidance on how to implement robust age verification without collecting any private data

Section 4: About you

Are you answering as:

- Q117 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 or a parent)?
 An ICO employee
 Other

Q117 Please specify:

a Owner of a business that would have to meet some of these rules

Q117 Please specify:

b

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

Q118 Etched Pixels Digital Design

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