# ico.

**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  I think that in subsequent sections, you are clearer about what may be detrimental to a child but here, I would have liked to have seen some examples of what would be positive, neutral or potentially detrimental to a child. I would also have liked some signposting to additional material that could consider in more depth the issue touched on regarding competing interests e.g. of different age groups, of children who don't identity in a binary way on gender or on sexuality, etc.

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

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  I do think that there are likely be challenges to set parameters about best interest.

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

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

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

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

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 I think that you might give more examples of non verbal based ways of communicating as they would be helpful not just to younger children, but also to those with limited communication strategies. You may also like to provide examples that could be used to help parents initiate discussions with young people about transparency, monitoring, and so forth (so this may apply to other areas of the code as well).

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

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

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

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 As noted above, I think it is hard to know what is meant by "shown to detrimental". There is much debate in the research literature about what is/isn't harmful/beneficial/neutral. I think that you will need some indication of reasonableness here and I would suggest that you consider implementing user groups and/or requiring user/monitoring groups to help assess how this standard in particular is being implemented, though it may be worth considering them for all standards. Such groups could include young people in suitably facilitated and supported ways as well as parents and industry. They could feed in electronically or in person, in separate or combined groups.

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 To be clear, I'd have liked "potentially" as an option here.

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 Here too, I think that the parameters of what is considered reasonable by way of interpretation will be tested, probably in court.

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 I think that 3 months for initial transition is fine but this should be extended to include monitoring, I would have thought for at least a further 12 months.

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 I commend the idea of "do what you say you do and say what you do" but it also implies an element of self regulation that has consistently been shown to fail in the past. If it can be done, then I would have thought that even clearer examples of how the ICO would use people's own standards to monitor them by would be useful. Also, I would like to see a clearer steer as to what steps the ICO proposes to ensure that people don't just stick with the minimum compliance threshold possible.

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

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

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

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

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

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

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  I think that "nudge" or behavioral insight/change has some quite specific meanings/associations and although it is useful to get people thinking about persuasive design, it's not all about "nudge". I think that acknowledging you're using a shorthand term would be useful as there are other things that would not be considered 'nudge' but do rely on people's preferences (e.g. order effects).

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 Again, potentially, as seamless connectivity may be effected (which may not be a bad thing). I would also like to add that I'm delighted to see this standard. I've been concerned about home hubs for a long time and it's very good to see the ICO following the lead of the German government and others in considering the implications of monitoring.

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 I don't think that there should be but on at least one of these standards, I wanted to acknowledge that I think that there is too much vested commercial interest that this being challenged here for there not to be feasibility challenges. Industry has ever incentive to drag its feet and to claim that it's about feasibility of the scale of the changes needed.

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

**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

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

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
a think they could be overcome?

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
a you think a reasonable transition period would be and why.

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

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

Q112 Potentially something more about young people who have additional vulnerabilities
a   and to note that these may mean that they have different knowledge/capabilities
    than might be expected of a young person in a particular age band.

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

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

Q116 The intention is to make this a global standard, it must therefore be tested and
a evaluated, in terms of process, outcomes and impacts.


# 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 of the public or a parent)?
- ◯ An ICO employee
- ◯ Other

Q117 Please specify:
a

Q117 Please specify:
b

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

Q118  Professor Joanna R Adler, Department of Psychology and Sports Sciences, University of Hertfordshire

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