

Standard 5 – Detrimental use of data

Common uses of children's data in online services and relevant codes, regulations and guidance

[Standard 5 of the Children's code – Detrimental use of data](#) – says that information society services (ISS) should 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.” This document sets out the current sources that are intended to protect children's wellbeing. It aims to support online services as you think about how you apply this standard, and consider the potential risks associated with your processing of children's data. This is in line with the advice in the Children's code, which states that ISS should “keep up to date with relevant recommendations and advice and not process children's personal data in ways that are obviously detrimental or run counter to such advice”. This list is intended to be a helpful guide but is not exhaustive, and is current at the time of publication in May 2021.

There are a wide range of ways in which the use of children's data online can create risk and potentially lead to harm. Our risk and harms framework (see the [ICO's AADC Harms Framework](#)) indicates that there are key harms that are likely to arise for children online:

- Loss of time: data-enabled service personalisation leads to excessive engagement. For example using reward loops, continuous scrolling, notifications and auto-play features.
- Cognitive and emotional development impeded: profiling and targeted advertising promotes content that impedes cognitive development.
- Promotion of unsafe or age-inappropriate products: targeted advertising promotes demonstrably unsafe or age-inappropriate products and services eg gambling, tobacco, alcohol, films, games aimed at adults.
- Financial loss: profiling and targeted ads are used to promote in service purchases by children, where children may not have the capacity or economic literacy to understand the implications.

- Grooming and radicalisation: ineffective age-assurance allows malicious actors to access online communities for children.
- Sharing personal information without valid reason: personal data of child users is shared with third parties against the best interest of the child.
- Algorithmic bias and discrimination in automated decision-making: automated decision-making (for example relating to age assurance) unfairly restricts access to services, or aspects of services, for children.
- Loss of social standing and interpersonal conflict: children's data shared with other users and social groups without consent, or set to on-by-default.
- Suppression or moderation of cultural expression: users online cultural expression is moderated not in accordance with policies and community standards.
- Lack of institutional accountability: online services fail to adhere to terms and conditions and community policies; avenues of redress for data rights are not available or accessible to users.
- Service lock-in: online services terms and conditions relating to personal data mislead or are too complex for children to understand, leading them to remain using the service.

As well as the resources signposted under each of the headings below, you can find general advice for safeguarding children online on the websites of many children-focused organisations, including: [the NSPCC](#), [Childline](#), [UK Internet Safety Council](#), [5Rights](#), [the Children's Commissioner](#) and [Tech UK's online harms resources](#).

The ICO is working through the [UK Digital Regulation Cooperation Forum](#). We will update the Children's Code Hub with any additional guidance that is produced to support organisations to understand how the different regulatory frameworks work together.

Research summary

1. Online health and safety

The government has produced an [Interim code of practice on online child sexual exploitation and abuse](#). This provides detailed guidance to help you understand and respond to online child sexual exploitation and abuse.

The Chief Medical Officer has produced [Commentary on screen based activities](#) which contains advice on appropriate amounts of screen time. This publication also summarises relevant research in this area and signposts other sources of guidance and best practice.

The Royal College of Paediatrics and Child Health have published an [e-learning module](#) on identifying vulnerabilities and signs of exploitation of young people. They have also issued guidance regarding [screen time](#) and the [use of social media](#) for young children.

You can find general advice on online safety for children on the [NSPCC website](#) (including advice on sexting, pornography, livestreaming and video apps, online gaming and explicit content). There are also many child-specific resources regarding mental health, available from organisations such as [Mind](#), the [NHS](#) and [Action for Children](#).

Guidance on setting internet controls on a child's device is provided at [Internet Matters](#).

2. Online games

The Office of Fair Trading has produced [Principles for online and app based games](#). This addresses the exploitation of children's vulnerability online and aggressive commercial practices when advertising to children online. The principles include being clear and up-front with users about costs and how their personal data will be used and ensuring that advertisements are separate and distinguishable from gameplay. The guidance also emphasises the need to consider the age of the intended audience when deciding on language used, presentation, design and structure of a game.

See also the [PEGI code](#) including best practice advice for providers such as privacy policies, age-rated content, reporting mechanisms, removal of content, detrimental behaviours online and advertising. [The International Age Rating Coalition](#) provides advice on global rating and age classification for digitally delivered games and apps.

TIGA has produced further [guidance \(aimed at parents\) on safe gaming for children](#).

3. Social media and messaging services

The government has issued a [Code of Practice for providers of online social media platforms](#). This sets out actions that the government believes social media platforms should take to prevent bullying, insulting, intimidating and humiliating behaviours on their sites. Whilst not specifically targeted at the use of children's data, the issues this code seeks to address are highly relevant to risks arising for children when using these kinds of platforms.

4. Advertising

The UK has two advertising codes which lay down rules which advertisers and media owners must follow. The BCAP Code deals with [broadcast advertising](#) and the CAP Code with [non-broadcast advertising](#). Both contain rules around advertising to children.

In broadcast advertising, you must take care when scheduling programmes and for advertisements covering material in a list of special category topics eg gambling and alcohol.

For non-broadcast advertising key rules include that marketers must:

- obtain verifiable consent of a parent or guardian if consent is being relied upon to offer promoted goods or services;
- bring to users' attention an age-appropriate privacy notice at the time of collecting personal data; and
- avoid using personal data of a child for automated decision-making around what advertisements to show a child.

See also [Standard 12: Profiling](#) for how the Children's code fits with [PECR](#) requirements.

5. Use of children's data in online journalism

Data relating to children may be used in the context of online journalism eg in written reports or in broadcast reporting. Ipso has produced the [Editors Code of Practice](#) which contains standards relating to the involvement of children in newspaper and magazine publications. These include requiring parent or guardian permission to interview and photograph children, limiting intrusion into children's private lives, and not identifying children who are victims or witnesses in sexual offence cases.

IMPRESS has also developed their [IMPRESS Standards Code](#) which regulates the news gathering activities and published material of regulated publications.

6. Broadcasting

The [Ofcom Broadcasting Code](#) contains rules around scheduling and content aimed at protecting children for both radio and television broadcasting.

7. Gambling

Websites or apps which offer gambling are required to comply with the Gambling Commission's [Licence conditions and codes of practice](#). You must have policies and procedures in place to prevent underage gambling.

There has been a dramatic increase in recent years in the gambling content associated with gaming, particularly in the form of [skin gambling](#) and loot boxes. There are many sources of guidance on this topic, including this government paper: [Gambling Harm – Time for Action](#). This is an area that is currently lacking in legislation, but reforms are underway following research from [DCMS](#) and a briefing paper from the [House of Commons](#) aiming to amend the scope of section 6 of the Gambling Act 2005 to classify loot boxes as "gambling" and bring them within scope of more stringent regulation.

8. Online retail

Retailers, including those that offer an online provision, are responsible for ensuring you do not sell age-inappropriate products or services to children.

The Association of Convenience Stores has issued [guidance](#) on how to avoid selling age-restricted products to underage consumers. This includes using stringent age-verification procedures, ensuring age-verification is undertaken on delivery and only permitting “collect from store” arrangements. You can find links to relevant legislation and further guidance on the first page of this guidance. The Home Office has also published a [policy paper](#) on the sale of knives. Further guidance on the sale of energy drinks is available from [BSDA](#).

Schedule 1: Table of key codes, advice and guidance to consider regarding standard 5 (Detrimental Use) of the Age appropriate design code

Code or guidance	
Committee on Advertising Practice	<p>The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code)</p> <p>See section 5 and section 10.15 – 10.17.</p> <ul style="list-style-type: none"> • Marketing communications addressed to, targeted directly at or featuring children must contain nothing that is likely to result in their physical, mental or moral harm. • Marketing communications addressed to, targeted directly at or featuring children must not exploit their credulity, loyalty, vulnerability or lack of children. • No direct exhortation to challenge parental authority. • Children under 13 need parental consent before processing. • The privacy policy given must use age-appropriate language. • User profiles of children should be avoided.
Committee on Advertising Practice	<p>The UK Code of Broadcast Advertising (BCAP Code)</p> <p>See section 5 – “children must be protected from advertisements that could cause physical, mental or moral harm”. Careful consideration on scheduling is therefore crucial to protect young people.</p>

Ofcom

[The Ofcom Broadcasting Code \(with the Cross-promotion Code and the On Demand Programme Service Rules\)](#)

- "Rule 1.2: In the provision of services, broadcasters must take all reasonable steps to protect people under eighteen."
- The television watershed (21:00) should be observed (and not an abrupt transition) and radio should have regard to when children are "likely to be listening" (Rule 1.4).
- Some content must have "mandatory restricted access" in place eg a PIN (Rule 1.18).
- Children's programmes must not contain product placement (Rule 9.7).
- Advertisements shall only be allowed to interrupt a children's programme once every 30 mins (Article 20 of the EU Audiovisual Media Services Directive (Directive 2010/13/EU)).

Ofcom

[Regulating video-sharing platforms \(ofcom.org.uk\)](#)

- New regulatory framework for VSPs included in the 2018 revision of the Audiovisual Media Services Directive.
- The new provisions include a requirement to take appropriate measures to protect children under 18 from videos and adverts that contain restricted material or harmful content, and to protect the public from incitement to hatred and violence and from criminal content.
- Provisions include VSPs ensuring adverts comply with specific advertising requirements around transparency, prohibited or restricted material, as well as with general advertising requirements.

Independent Press Standards Organisation (Ipsos)

[The Editors' Code of Practice](#)

See section 6 regarding interviewing a child under 16 and section 9 regarding not naming children that are arrested or witnesses or victims to a crime.

IMPRESS	<p>The Impress Standards Code</p> <p>See section 3: Children</p> <ul style="list-style-type: none"> • Interviews, photographs, and other recording of children under 16 only with consent of parents. • Children under 16 should not be identified without consent of a responsible adult unless there is an exceptional public interest. • Consider reasonable requests from under 16s to anonymise online versions of published articles.
ICO	<p>ICO's Children's Code Harms Framework</p> <p>See the 15 standards needed to protect children's data. In particular, standard 5 on the detrimental use of data.</p>
Office of Fair Trading	<p>Principles for online and app-based games</p> <p>Principles address the following concerns:</p> <ul style="list-style-type: none"> • A lack of transparent, accurate and clear up-front information relating, for example, to costs, and other information material to a consumer's decision about whether to play, download or sign up to a game. • Misleading commercial practices, including failing to differentiate clearly between commercial messages and gameplay. • Exploiting children's inexperience, vulnerability and credulity, including by aggressive commercial practices. • Including direct exhortations to children to buy advertised products or persuade their parents or other adults to buy advertised products for them. • Payments taken from account holders without their knowledge, express authorisation or informed consent.
Chief Medical Officer	<p>Commentary on screen based activities</p> <p>An association has been seen between those who engage in</p>

screen-based activities more frequently and/or over longer periods, and mental health problems. However, it is not clear that the screen-based activities are the cause of those problems.

Advice for industry: the technology industry should now establish a voluntary code of conduct addressing how they safeguard CYP on their sites. They should involve civil society and independent experts. Potential areas for inclusion are:

- clear terms of use that children can understand;
- enforcing their own terms and conditions and working with government to put in place effective age verification; and
- recognising the 'precautionary approach' in developing structures and remove addictive capabilities.

Gambling Commission

[Consumer guide](#)

Any organisation offering gambling must have procedures in place to prevent underage gambling (must be over 18).

Also contains advice on skins gambling (also see parent zone resources).

- All gambling websites regulated by the Commission must have:
- up-to-date policies and procedures designed to prevent underage gambling;
- a warning that underage gambling is an offence; and
- a requirement that customers affirm they are legally old enough to gamble.

[Licence conditions and codes of practice](#)

See part 2, section 3.

UK Government

[Interim code of practice on online child sexual exploitation and abuse](#) (be transparent about the steps you have taken to protect children and share best practice and useful tools with smaller businesses to introduce greater mechanisms to protect children) and [Voluntary principles to counter online](#)

[Child Sexual Exploitation and Abuse.](#)

Principle 1: Prevent known child sexual abusive material.

Principle 2: Seek to identify and combat new child sexual abuse material.

Principle 3: Identify and combat grooming techniques.

Principle 4: Prevent recruiting of children for sexual exploitation.

Principle 5: Report live-streaming services showing child sexual exploitation.

Principle 6: Companies prevent search results from returning results showing child sexual exploitation.

Principle 7: Companies adopt enhanced safety procedures when users might be children.

Principle 8: Companies report likely sexual exploitation material.

Principle 9, 10 and 11: Companies take a collaborative and global approach to tackling these issues.

UK Government

[Code of Practice for providers of online social media platforms](#)

- There should be a way for non-users to report harmful conduct on behalf of users eg teachers and parents.
- There should be robust procedures in place for dealing with complaints and reports of abuse or misconduct.
- Inform users of the consequences of harmful conduct and provide an accessible definition.
- Give information about what action is or has been taken against those who breach these policies.

Parliament

[Gambling Harm—Time for Action](#)

“Gambling” definition should be widened to incorporate these new forms of gambling which are easily accessed by children, namely loot boxes and skins gambling.

<p>PEGI</p>	<p>Online safety code</p> <p>Organisations abiding by the PEGI code of conduct will ensure:</p> <ol style="list-style-type: none"> 1. coherent privacy policy; 2. age-rated game content; 3. reporting mechanisms; 4. remove inappropriate content; and 5. responsible advertising.
<p>IARC</p>	<p>Global ratings coalition for games</p> <p>Globally streamlined age ratings authority. Reviews games for use on online platforms to issue them with an appropriate age rating.</p>
<p>DCMS</p>	<p>Addictive technologies</p> <p>Games companies should share aggregated player data with researchers and be made to contribute financially to independent research of the adverse effects of gaming.</p> <p>Further assessment is needed of the gambling-like mechanisms in games to further understand the effects of these and any emerging trends.</p> <p>Research around addiction and excessive screen time should be carried out to understand more about these affects and how harm they cause could be mitigated.</p>
<p>Mental health resources</p>	<p>Action for Children</p> <p>Mind</p> <p>NHS</p>

Legislation title

[Digital Economy Act 2017](#)

[UK GDPR](#) and [Data Protection Act 2018](#)

[The Privacy and Electronic Communications \(EC Directive\) Regulations 2003](#)

[The Consumer Protection from Unfair Trading Regulations 2008 \(SI 2008/1277\)](#)

[Gambling Act 2005](#)

[Online harms white paper](#)

[Equality Act 2010](#)

Schedule 2: Sources of research

- UK government explanatory memorandum
<https://www.gov.uk/government/publications/explanatory-memorandum-to-the-age-appropriate-design-code-2020-2020/explanatory-memorandum-to-the-age-appropriate-design-code-2020-2020>
- UK Government – Code of Practice for providers of online social media platforms
<https://www.gov.uk/government/publications/code-of-practice-for-providers-of-online-social-media-platforms>
- UK Government – Interim Code of Practice on online child sexual exploitation and abuse
<https://www.gov.uk/government/publications/online-harms-interim-codes-of-practice/interim-code-of-practice-on-online-child-sexual-exploitation-and-abuse-accessible-version#introduction>
- UK Government – Digital Regulation Cooperation Forum
<https://www.gov.uk/government/collections/the-digital-regulation-cooperation-forum>
- ICO Age Appropriate Design Code guide
<https://ico.org.uk/for-organisations/guide-to-data-protection/key-data-protection-themes/age-appropriate-design-a-code-of-practice-for-online-services/>
- UNICEF convention rights of a child UNCRC
<https://downloads.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf>
- Practical Law Company practice note: “*Children and the law*”
- Online Harms White Paper
<https://www.gov.uk/government/consultations/online-harms-white-paper/outcome/online-harms-white-paper-full-government-response>
- UK GDPR and recitals

- Northern Ireland Council for Voluntary Action: Data Protection Toolkit – Protection children’s data
<https://www.nicva.org/data-protection-toolkit/templates/childrens-data-and-gdpr>
- Italian regulator investigation into social media attempts to prevent minors accessing profiles
<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9527301>
- Europa legislation mapping – Is there a main legal instrument on child protection at national level? (2014)
https://fra.europa.eu/en/publications-and-resources/data-and-maps/cps?dataSource=CPS_en_57380&media=png&width=740&topic=group1&question=CPS_NAT_LEG&plot=MAP&subset=NONE&subsetValue=NONE&answer=CPS_NAT_LEG&year=2014
- French regulator white paper on the use of voice assistants
https://www.cnil.fr/sites/default/files/atoms/files/cnil_white-paper-on_the_record.pdf
- Children’s Commissioner “Who knows what about me”
<https://www.childrenscommissioner.gov.uk/digital/who-knows-what-about-me/>
- Royal Society for Public Health – age ratings in gaming
<https://www.rsph.org.uk/about-us/news/alliance-calls-for-enforcement-of-age-ratings-in-gaming-to-protect-children-from-online-harm.html>
- Shufti Pro – Age verification: Use cases, significance and regulations
<https://shuftipro.com/blog/age-verification-use-cases-significance-and-regulations>
- Ipso – The Editors’ Code of Practice
<https://www.ipso.co.uk/editors-code-of-practice/>
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
<https://www.legislation.gov.uk/uksi/2003/2426/contents/made>
- OFT – Principles for online and app-based games
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288360/oft1519.pdf
- Chief Medical Officer – Commentary on screen based activities
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/777026/UK_CMO_commentary_on_screentime_and_social_media_map_of_reviews.pdf
- General Medical Council – protecting children and young people
<https://www.gmc-uk.org/-/media/documents/protecting-children-and-young->

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- House of Commons – Impact of social media and screen-use on young people’s health
<https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/822/822.pdf>
- Department for Digital, Culture, Media and Sport – age verification regulator commentary
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673425/Guidance from the Secretary of State for Digital Culture Media and Sport to the Age-Verification Regulator for Online Pornography - January 2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673425/Guidance_from_the_Secretary_of_State_for_Digital_Culture_Media_and_Sport_to_the_Age_Verification_Regulator_for_Online_Pornography_-_January_2018.pdf)
- Digital Economy Act 2017
<https://www.legislation.gov.uk/ukpga/2017/30/enacted>
- Gambling commission: young people and gambling report
<https://www.gamblingcommission.gov.uk/PDF/Young-people-and-gambling-2020/Young-People-and-Gambling-2020-Technical-Report.pdf>
- The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code)
<https://www.asa.org.uk/uploads/assets/47eb51e7-028d-4509-ab3c0f4822c9a3c4/b721618e-3c2c-438d-8024411970aa2c75/The-Cap-code.pdf>
- The UK Code of Broadcast Advertising (BCAP Code)
<https://www.asa.org.uk/uploads/assets/846f25eb-f474-47c1-ab3ff571e3db5910/c6704aec-d1e5-4431-81c18355cb9eac8a/BCAP-Code-full.pdf>
- The Ofcom Broadcasting Code (with the Cross-Promotion Code and the On Demand Programme Service Rules)
<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-one-protecting-under-eighteens>
- ICO’s [Children’s Code Harms Framework](https://ico.org.uk/childrenscore)
<https://ico.org.uk/childrenscore> and
<https://1/ico.org.uk/media/for-organisations/documents/2618906/childrenscore-harm-framework-beta.xlsx>
- The Consumer Protection from Unfair Trading Regulations 2008 (SI 2008/1277)
<https://www.legislation.gov.uk/uksi/2008/1277/made>
- Internet matters
<https://www.internetmatters.org/advice/>
<https://www.internetmatters.org/hub/news-blogs/consultation-response-online-harms-and-the-ethics-of-data/>

<https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-Living-For-The-Future-Report.pdf>

- UK Council for Internet Safety: Education for a Connected World
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS Education for a Connected World .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS_Education_for_a_Connected_World_.pdf)
- Department for Education: Keeping children safe in Education, Data Protection Toolkit for Schools and Teaching online safety in school.
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping children safe in education 2020 - Update - January 2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_-_Update_-_January_2021.pdf)
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- The Good App Guide
<https://www.goodplayguide.com/good-app-guide/>
- The UK Council for Child Internet Safety
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/487973/ukccis_guide-final_3 .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/487973/ukccis_guide-final_3_.pdf)
- British Toy and Hobby Association
<https://www.btha.co.uk/guidance/connected-toys/>
- O2 advice on nuisance calls
<https://www.o2.co.uk/help/everything-else/digital-family/nuisance-calls-and-texts>
- Association of convenience stores advice on preventing underage sales
[https://www.acs.org.uk/sites/default/files/acs advice age restricted sales aw6_d3_14.03.18_printerspairs.pdf](https://www.acs.org.uk/sites/default/files/acs_advice_age_restricted_sales_aw6_d3_14.03.18_printerspairs.pdf)
- BSDA Code of Practice for High Caffeine Content Soft Drinks
<https://www.britishsoftdrinks.com/Position-Statements/energy-drink>
- Home office sale of knives
<https://www.gov.uk/government/publications/sale-of-knives-voluntary-agreement-by-retailers/sale-of-knives-voluntary-agreement-by-retailers>
- Parent Zone: skin gambling
<https://parentzone.org.uk/article/what-skin-gambling>
<https://parentzone.org.uk/the-rip-off-games>
[https://parentzone.org.uk/system/files/attachments/Skin Gambling Report June 2018.pdf](https://parentzone.org.uk/system/files/attachments/Skin_Gambling_Report_June_2018.pdf)

- Parliament – gambling harm: time for action
<https://publications.parliament.uk/pa/ld5801/ldselect/ldgamb/79/7909.htm>
- Childline – disabilities
<https://www.childline.org.uk/info-advice/you-your-body/disability-learning-differences/>
- Equality Act 2010
<https://www.gov.uk/definition-of-disability-under-equality-act-2010>
- PEGI – online safety code
<https://pegi.info/page/pegi-online-safety-code>
- IARC – getting a game rated with a global rating coalition
<https://www.globalratings.com/>
- DCMS – report on addictive technologies
<https://www.gov.uk/government/publications/government-response-to-the-digital-culture-media-sport-select-committee-report-on-immersive-and-addictive-technologies/government-response-to-the-digital-culture-media-sport-select-committee-report-on-immersive-and-addictive-technologies>
- House of Commons briefing paper – loot boxes in video games
<https://commonslibrary.parliament.uk/research-briefings/cbp-8498/#:~:text=The%20Gambling%20Commission%20has%20said,regulatory%20powers%20to%20take%20action.>
- Gov.uk – children and employment
<https://www.gov.uk/child-employment>
- House of commons paper – Employment of Children Standard Note: SN/BT/653
- Tech UK – article on DRCF formation
<https://www.techuk.org/resource/digital-regulation-cooperation-forum-has-launched-its-plan-for-work-for-2021-to-2022.html>
- Tech UK – online harms policy
<https://www.techuk.org/shaping-policy/online-harms.html>
- Action for Children
<https://www.actionforchildren.org.uk/our-work-and-impact/children-and-families/good-mental-health/>
- NHS
<https://www.nhs.uk/oneyou/every-mind-matters/childrens-mental-health/>
- Mind
<https://www.mind.org.uk/information-support/for-children-and-young-people/>

- RCPCH
<https://www.rcpch.ac.uk/resources/impact-social-media-screen-use-young-peoples-health-consultation-response>
- <https://www.rcpch.ac.uk/resources/exploitation-children-young-people-online-learning>

Note: This document was written with the assistance of DLA Piper.