

Children's code strategy: interim impact review

November 2025



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Executive summary

In April 2024, the Information Commissioner's Office (ICO) published the Children's code strategy (CCS). The strategy builds on progress since the introduction of the Children's code in 2021.

The CCS is a two-year strategy focused on addressing industry conformance with the code. During its first year of operation, the CCS prioritised data processing harms by social media platforms (SMPs) and video sharing platforms (VSPs). It aimed to identify data processing issues that could result in significant risks and harms to children and work to eliminate them through developing evidence-based policy, engagement, and supervision plans.

The purpose of this interim impact review is to provide an assessment of the CCS progress, implementation and outputs, outcomes and early impacts during its first year of operation. The interim report will be supplemented by a final impact review of the CCS in 2026/27.

Key findings from the review of inputs, activities and outputs include:

Significant resource has been committed to the CCS: The CCS has been delivered as a cross-office programme of work, involving 45 members of staff, across 12 ICO department and a programme director. This aggregates to the equivalent of around 22 FTE staff.

Key activities delivered to date align with what was set out in the CCS theory of change: The CCS has enabled cross-office working to undertake research, gather evidence and engage with 32 platforms. This has included risk assessments of services in scope, a literature review, a call for evidence, engagement and requests for information. Use of upstream and downstream regulatory interventions has been bespoke and tailored.

Wider and enabling activities delivered include joint work with Ofcom, international engagement, speaking at various events, the completion of two iterations of Children's Data Lives research and a communications programme to raise awareness of changes made and action taken.

A range of outputs have been achieved to date: Information and insights have been gathered from most platforms in scope of the CCS, which has helped to build internal knowledge. The delivery of upstream interventions led to engagement with almost all platforms. This has

contributed to raising awareness and encouraging improvements to data privacy practices. Reflecting the targeted, evidence-based decisions regarding downstream intervention, this was only deemed necessary for a sub-group of platforms in scope.

There has also been a range of outputs from wider and enabling activities. For example, the publication of a joint online safety statement with Ofcom, a joint international statement on a common international approach to age assurance, a summary of responses to the CCS call for evidence, and a blog from the ICO's Deputy Commissioner for Regulatory Policy regarding protecting children's data in a digital world.

Progress against outcomes and impacts was also assessed. The key findings from this review are as follows:

Improvements made following CCS interventions are already affecting at least 6% of UK children aged 3-17 (including 13% of UK children aged 13-17): Following CCS interventions, changes have been made by 8 platforms to improve their data protection practices, which has affected at least 747,000 UK children aged 3-17 (6% of all UK children aged 3-17). Across all platforms that have made or are planning to make changes that are at least partially attributable to the CCS, up to 3 million child users in total (aged 3-17) could be affected. Because some children use more than one platform, this figure does not necessarily represent individual children in the population. The CCS has demonstrated that the bespoke use of both upstream and downstream approaches to intervention is effective in driving compliance. Wider and enabling activities delivered have helped to enhance the ICO's profile as a leader in children's privacy. There is also initial evidence of this contributing towards deterrence effects and supporting compliance amongst platforms in scope of the CCS (though we have not yet been able to collect any evidence to understand whether this is also contributing towards deterrence effects in the wider market).

Initial evidence of attribution: Staff involved in delivering the CCS were relatively confident that the majority of changes reported to date could at least be partially attributed to the CCS. Initial evidence from platforms interviewed confirmed partial or full attribution of changes made by two platforms, and deterrence effects associated with the CCS influencing decisions regarding a change made by a third platform.

These outcomes and early impacts indicate that the CCS is progressing well against the outputs, outcomes and impacts set out in the CCS theory of change (though at this stage, the findings are based on a limited scale of evidence). This suggests that the CCS is on track to deliver its desired impacts. The review provided lessons regarding the way in which the CCS has been implemented and the use of regulatory tools which should be considered for future ICO interventions. Key factors that have helped to enable regulatory impact to date include:

- **taking a research and evidence-led approach to intervention:** effective use of research and evidence has meant that the ICO was able to act from a position of credibility and deeper understanding of the issues.
- **effective use of upstream interventions to drive changes:** the improvements made by platforms following engagement with the ICO and initial evidence of deterrence effects highlight the value of upstream engagement as a regulatory tool.
- **bespoke use of downstream regulatory interventions:** the CCS has demonstrated that being able to use the ICO's regulatory tools flexibly and in a tailored way, after careful consideration of the issues, has worked well. Having the ability to escalate to downstream approaches where required has proven useful for more complex issues.
- **publicising the CCS and regular public updates on progress:** providing updates, naming platforms and outlining ICO action taken has improved transparency. This has had a positive impact on the ICO's standing in children's privacy.
- **focusing on SMPs and VSPs during the first year of delivery:** this has helped to drive focused research, evidence gathering and interventions, ensuring that the work was well-targeted and not as diluted as it might otherwise have been.
- **coordination effectiveness driven by the internal cause structure:** this has facilitated cross-team working and resourcing, due to the CCS being seen as a priority workstream across the ICO.
- **building in time and processes to monitor and review progress and impact:** this has allowed time to reflect and review what has been delivered, progress against outputs and outcomes and whether there are opportunities to do more or deliver interventions differently to drive greater impact.

1. Introduction

1.1. Background

In April 2024, the Information Commissioner's Office (ICO) published the Children's code strategy (CCS).¹ The strategy builds on progress since the introduction of the Children's code (the code, formerly known as the Age Appropriate Design Code²) in 2021. The ICO's Children's code is a statutory code of practice which explains how organisations can ensure that their digital services safeguard children's personal information. The code sets out 15 standards of age-appropriate design, reflecting a risk-based approach.

In early 2024, as part of CCS development, the ICO set out a two-year programme plan for the CCS to develop plans to address industry conformance with the code. The ICO agreed to prioritise data processing harms by social media platforms (SMPs) and video sharing platforms (VSPs) that could result in significant risks and harms to children, and to work to eliminate them through developing evidence-based policy, engagement, and supervision plans.

The ICO selected six areas of focus to be tested to assess the level of non-conformance with the Children's Code and UK GDPR for services intended to be legitimately accessed by users under 18.

Table 1 below outlines what each area of focus relates to. Where relevant, it was expected that this would enable evidence-based decisions regarding regulatory intervention options to be identified and actioned.

Regulatory interventions can take various forms depending on the issue at hand. In this report, we refer to the spectrum of regulatory tools used by the ICO with the following categories.

- Upstream interventions: in the context of the spectrum these are lighter-touch tools and can be thought of as enabling and softer

¹ ICO (2024) Our Children's code strategy. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/> (Accessed: 20 March 2025).






² ICO (2020) Age appropriate design: a code of practice for online services. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/age-appropriate-design-a-code-of-practice-for-online-services/> (Accessed: 20 March 2025).

tools, such as education, engagement, influence, advice and guidance, letters, requests for information (RFIs), and compliance discussions.

- Downstream interventions: these should be understood as moving towards more rigid and firmer interventions on the spectrum ranging from information notices (INs), audits, compliance monitoring, investigations, and enforcement.

These categories are not mutually exclusive and often work together to achieve regulatory goals.

Table 1: Six CCS areas of focus

Area of focus	Description
	1 Developing and deploying recommender systems that lead to children receiving more harmful content than they otherwise would.
	2 Developing and deploying recommender systems that lead to children staying on the platform in a way that is detrimental to their wellbeing.
	3 Profiling children for targeted advertising in a way that is not in the best interests of the child.
	4 Not setting children's profiles as private by default .
	5 Not switching off geolocation by default.
	6 Processing the data of under 13s unlawfully.

Source: ICO analysis.

1.2. Interim impact review aims

The purpose of this interim impact review is to provide an assessment of the CCS progress, implementation and outputs, outcomes and early impacts during its first year of operation. The interim report will be supplemented by a final impact review of the CCS in 2026/27. The decision to deliver an interim and final ex-post impact review was made in

line with the criteria and principles set out within our Ex-Post Impact Framework,³ and will serve to meet our commitment in the CCS to providing updates on our progress and measurement of success. This approach was considered proportionate, balancing risks, costs and benefits given that:

- the CCS is a high-profile, strategic cause area for the ICO;
- the ICO is aiming to drive substantial outcomes and impacts through CCS interventions;
- the significant time and resource that has been committed to the CCS across the ICO;
- the existing evidence base provided through our previous Children's code evaluation;⁴ and
- the potential to act on lessons learned and transfer learnings to other strategic cause areas.

The interim and final impact reviews are being undertaken by the ICO's Economic Analysis Directorate. While we recognise that this makes it an internally delivered review, care is being taken to ensure impartiality through the design of research planned to feed into the reviews, which at the final review stage, will also involve externally commissioned research (subject to budget approval).

Reflecting the complex nature of the CCS and its delivery landscape, the review adopts a theory-based approach. Our approach to the review draws on best practice in evaluation in line with HM Treasury's Magenta Book.⁵ The review predominantly focuses on **impact evaluation** to understand what difference the CCS has made. Sitting alongside the review is an internal exercise focusing on an assessment of process learnings to reflect on what can be learned from how the CCS was delivered. Dissemination of this learning will be via internal governance structures.

³ ICO (2024) Ex-Post Impact Framework. Available at: https://ico.org.uk/media/about-the-ico/documents/4031030/ex-post-impact-framework_sept24_v1.pdf (Accessed: 2 May 2025).

⁴ ICO (2023) Children's code evaluation. Available at: <https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/impact-and-evaluation/evaluations/children-s-code-evaluation-march-2023/> (Accessed: 2 May 2025).

⁵ HM Treasury (2024) Magenta Book. Available at: https://assets.publishing.service.gov.uk/media/5e96cab9d3bf7f412b2264b1/HMT_Magenta_Book.pdf (Accessed: 2 May 2025).

1.3. Report structure

The report is structured as follows:

- **Section 2: Approach to the review** sets out the approach that was taken and the evidence base.
- **Section 3: CCS context** outlines the continued relevance of the CCS in light of the changing strategic and policy context and the CCS theory of change.
- **Section 4: CCS implementation** reviews the resources used to deliver the CCS during its first year of operation, and the activities and outputs delivered to date.
- **Section 5: CCS outcomes and impacts** assesses the extent to which each of the areas of focus and CCS overall is on track against the outcomes and impacts expected at this stage, unanticipated outcomes and the level of attribution to the CCS.
- **Section 6: Attribution, unintended outcomes and deterrence** considers factors that help understand impact further, including the attribution of outcomes and impacts observed to the CCS, whether there have been any unintended or unanticipated outcomes and evidence of deterrence effects in the market.
- **Section 7: Initial findings and lessons learned** synthesises the evidence from across the review, providing an overview of the key impact findings and lessons learned from the first year of delivering the CCS. It also outlines the next steps for the review.

The report is supplemented by four annexes:

- **Annex A: Research questions for the review;**
- **Annex B: Evidence streams;**
- **Annex C: Review of progress against the theory of change for each area of focus;** and
- **Annex D: Glossary.**

2. Approach to the review

In this section we set out the focus of the review, the approach taken and sources of evidence we have drawn on.

2.1. Review focus and approach

The review adopts a theory-based approach, which is underpinned by the synthesis of evidence and consideration of the CCS theory of change (ToC). This has involved reviewing evidence regarding what has happened as a result of the CCS in practice, compared to what was expected to happen (as set out in ToC) and exploring any unintended or unanticipated outcomes.

The overarching research questions for the interim impact review are outlined below. Annex A: outlines a series of sub-questions that the review has been designed to explore and gather evidence to respond to.

Overarching research questions for the interim impact review:

1. What are the outputs, outcomes and emerging impacts of the CCS to date?
2. What lessons can be learned from the first year of delivering the CCS?

The review tests the extent to which the CCS was important in generating the outcomes and impacts identified to date, relative to other factors. This approach reflects the complex and dynamic nature of the CCS and its delivery landscape.

The review has been designed with consideration of proportionality given the available resources, evidence available at this stage, and timescales which do not yet permit for some of the longer-term, more substantial impacts to have occurred.

The review is being carried out in two phases with an interim impact review (this report) and a final impact review currently planned for 2026/27, reflecting that the CCS was developed as a two-year delivery strategy. We recognise that children's privacy is likely to continue to be a priority for the ICO going forward, so we will continue to monitor our impacts beyond this period (including through a planned longitudinal survey with children and parents to enable us to gather evidence of change over time).

2.2. Sources of evidence

In Table 2 below we summarise the key evidence streams that have been drawn on to inform the interim impact review. A full list of sources of evidence for this interim impact review and the final impact review are provided in Annex B:.

Table 2: Sources of evidence

Source of evidence	Description
Monitoring data and analysis of the number of children affected by the CCS	This includes a review of monthly CCS reporting documents, monitoring data and analysis captured via a bespoke dashboard which captures key outputs, outcomes and impacts of the CCS. The dashboard also includes analysis undertaken by the ICO to estimate the number of children affected by the CCS to date.
Workshops with teams involved in delivering the CCS	We delivered a series of workshops/interviews with the key teams involved in delivering the CCS to gather views on process and impact. We intend to follow these up with a greater variety of interviewees (including external stakeholders) for the final impact review.
Interviews with a small number of platforms that the ICO has directly engaged with as part of the CCS	We conducted three interviews with social media/video sharing platforms (SMPs/VSPs) that the ICO has engaged with as part of the CCS to inform case studies. These explore the extent to which ICO engagement and enforcement has driven any changes in data protection processes and practices, confidence in complying with the code, the impacts this has had on the organisation and extent to which outcomes and impacts can be attributed to the CCS.

Source: ICO analysis.

3. CCS context and theory of change

This section outlines the theory of change (ToC) for the CCS, which sets out how and why the desired impacts were expected to be achieved through the implementation of the CCS, and underpinning assumptions. As such, it provides a framework for reviewing how the CCS has worked in practice compared to what was expected and whether underpinning assumptions have proven to be valid.

Within this section, we review the rationale for developing the CCS at the time the strategy was developed (early 2024) and the continued relevance and consistency of the strategy one year on (in light of changes to context during delivery), how it was expected that the CCS would be implemented and what it aimed to achieve.

3.1. CCS theory of change

3.1.1. Rationale for developing the CCS

The context and rationale section of the ToC outlines why the strategy was developed and its alignment with wider policy and legal context at the time that the strategy was developed.

As outlined in Section 1.1, the CCS builds on progress since the introduction of the Children's code in 2021. The CCS is an implementation tool to drive the ICO's Children's code activity over a two-year period, alongside the ongoing 'business as usual' activity underway in relation to children's privacy (eg research programmes,⁶ international engagement, ongoing investigations). The six CCS areas of focus directly relate to the Children's code, which sets out the Information Commissioner's expectations of how information society services (ISS) should comply with data protection law. ISS that do not conform with the Code are therefore likely to find it difficult to demonstrate that their processing is fair and complies with the UK GDPR, and may therefore be subject to regulatory action by the ICO.

The CCS aims to focus activity in areas where the ICO has identified high risks of data protection harms, where it could drive change. In the first

⁶ Revealing Reality (2024) Children's data lives 2024; a report for the ICO. Available at: <https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/research-and-reports/children-s-data-lives-research/> (Accessed 20 June 2025).

year of the CCS, this included focusing on SMPs and VSPs, due to the prevalence of use of SMPs and VSPs amongst children⁷ and identified risks of data protection harms associated with the ways in which platforms process children's data.

As noted in the ICO's Children's code evaluation,⁸ regulation exists on a spectrum ranging between tools such as upstream work and audits through to progressing to enforcement, where necessary. The CCS was seen as an opportunity to demonstrate to the public the range of regulatory tools used by the ICO to implement the Children's code and the ways in which these tools are driving changes in the market.

3.1.2. Underpinning market failure rationale

At the time the CCS was developed, key underpinning market failures included imperfect information and negative externalities. Over a year since the strategy was developed, the market failure rationale remains relevant:

- **Imperfect information:** where privacy information lacks clarity or is overly complex, this can inhibit a child's ability to make informed decisions about, or request changes to how their data is being processed, collected or stored. Further to this, use of harmful design practices (eg default settings that give less control over privacy information or group settings together) can push children to share more data than they otherwise would wish to.
- **Negative externalities:** Each of the areas of focus for the CCS is associated with potential risk of data protection harms⁹ for children (eg the loss of control of personal data, manipulation, psychological harms). Where this leads to negative knock-on effects for wider society, this presents a market failure in the form of negative externalities. This includes costs to society in addressing harms to individuals, and the risk that widespread chilling effects mean that

⁷ Ofcom (2023) Children and Parents: Media Use and Attitudes. Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/media-literacy-research/children/childrens-media-use-and-attitudes-2023/childrens-media-use-and-attitudes-report-2023.pdf?v=329412> (Accessed 20 June 2025).

⁸ ICO (2023) Children's code evaluation. Available at: <https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/impact-and-evaluation/evaluations/childrens-code-evaluation-march-2023/> (Accessed 20 June 2025).

⁹ ICO (2022) Overview of Data Protection Harms and the ICO's Taxonomy. Available at: <https://ico.org.uk/media/about-the-ico/documents/4020144/overview-of-data-protection-harms-and-the-ico-taxonomy-v1-202204.pdf> (Accessed: 6 May 2025).

children (possibly led by parents) discontinue or substantially reduce use of SMPs and VSPs because of a general distrust. This could damage the economy where it results in compliant services also losing customers.

3.1.3. Strategic and policy context

Children's privacy is a strategic cause area for the ICO.¹⁰ The ICO25 Strategic Plan¹¹ outlined an enduring objective 'to safeguard and empower people, particularly the most vulnerable', and within this plan it stated that 'we will continue to enforce our Children's code and influence industry to ensure children benefit from an online experience.'

Over the first year of delivering the CCS, the policy context remained supportive of intervention in this area, as demonstrated by alignment with recent developments such as:

- the enactment of the Online Safety Act¹² (overseen by Ofcom), which imposes duties that require providers of services covered by the Act to mitigate and manage the risk of harm from content and activity that is harmful to children; and
- the Data (Use and Access) Act¹³ (which received royal assent on 19 June 2025) which includes provisions aimed at strengthening the protection of children's personal data. The Act reinforces the obligation of controllers to build in data protection by design and amends Article 25 of the UK GDPR to highlight that children merit specific protection with regard to their personal data.

3.1.4. Anticipated activities, outputs and outcomes

Four strands of **activities** were referenced in the CCS ToC:

- After identifying the issues (the six CCS areas of focus), the first phase of activities (**assess and define**) was designed to thoroughly review practices of platforms in the space and gather evidence.

¹⁰ <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2024/04/ico-sets-out-priorities-to-protect-childrens-privacy-online/>.

¹¹ ICO (2022) ICO25 Strategic Plan. Available at: <https://ico.org.uk/about-the-ico/our-information/our-strategies-and-plans/> (Accessed: 26 March 2024).



¹² Online Safety Act (2023) Available at: <https://bills.parliament.uk/bills/3137> (Accessed: 10 April 2024).

¹³ Data (Use and Access) Act (HL) Available at: <https://bills.parliament.uk/bills/3825> (Accessed 1 August 2025).

- Where the ICO identified evidence of non-compliance and harm, this was then expected to inform a discussion regarding the regulatory options the ICO should use to bring about compliance and adherence to the code in the second (**deliver upstream interventions**) and third (**deliver downstream interventions**) phases of activities.
- The fourth strand outlines the **wider and enabling activities** expected to be delivered. These activities are not directly linked to the areas of focus for the CCS but were expected to support and enable the impacts the CCS was aiming to deliver.

The sections which follow 'activities' in the theory of change, as we move right along the impact journey, outlines the links to the anticipated **outputs, outcomes and impacts**. The CCS was expected to affect a range of stakeholders, as outlined in Table 3 below. Section 5.1.2 reviews evidence of how these groups have been affected to date by the CCS in practice.

Table 3: Expected effect on stakeholders

Stakeholder group	Expected effect from CCS
 Children, parents and guardians	<p>The CCS aimed to ensure that children gained greater protection of their privacy and online experiences. It was expected that the CCS work would result in parents and guardians feeling more confident about their children using online services. Around 98% of children (age 3-17) have access to the internet at home, which means that CCS work has the potential to affect up to 11.7 million children.</p>
 SMPs and VSPs	<p>The strategy included a review of a sample of 34 SMPs and VSPs, selected on the basis of UK app download figures, Ofcom research findings¹⁴ on use of platforms by children in the UK and whether the terms of service allowed under 18s to view content and set up accounts. This included platforms of a range of sizes, including both well-established and newer services. Where</p>

¹⁴ Ofcom (2023) Online nation. Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2023/online-nation-2023-report.pdf?v=368355> (Accessed 21 July 2025).

examples of non-compliance and risk of data protection harms were identified, this was then expected to inform a discussion regarding the regulatory options the ICO should use to bring about compliance and adherence to the Code. It was expected that any interventions deemed necessary would lead to improvements to data privacy practices from the targeted SMPs/VSPs.

	Other similar services	It was expected that there may be some ripple effects where any changes made by platforms interventions are targeted at leads to wider deterrence effects in the market. It was also anticipated that the wider CCS work (including publications and engagement) would lead to increased information/knowledge and regulatory certainty amongst industry.
	Civil society groups and relevant charitable organisations	While unlikely to be directly impacted, it was expected that relevant groups and organisations would take a strong interest in any publications relating to the CCS.
	Internal stakeholders	Resources required to develop and deliver the CCS, and increasing the ICO's understanding of the scale and severity of non-compliance with UK GDPR and the Children's code, meaning the ICO becomes a more informed regulator with an enhanced evidence base to make better decisions on regulatory interventions.

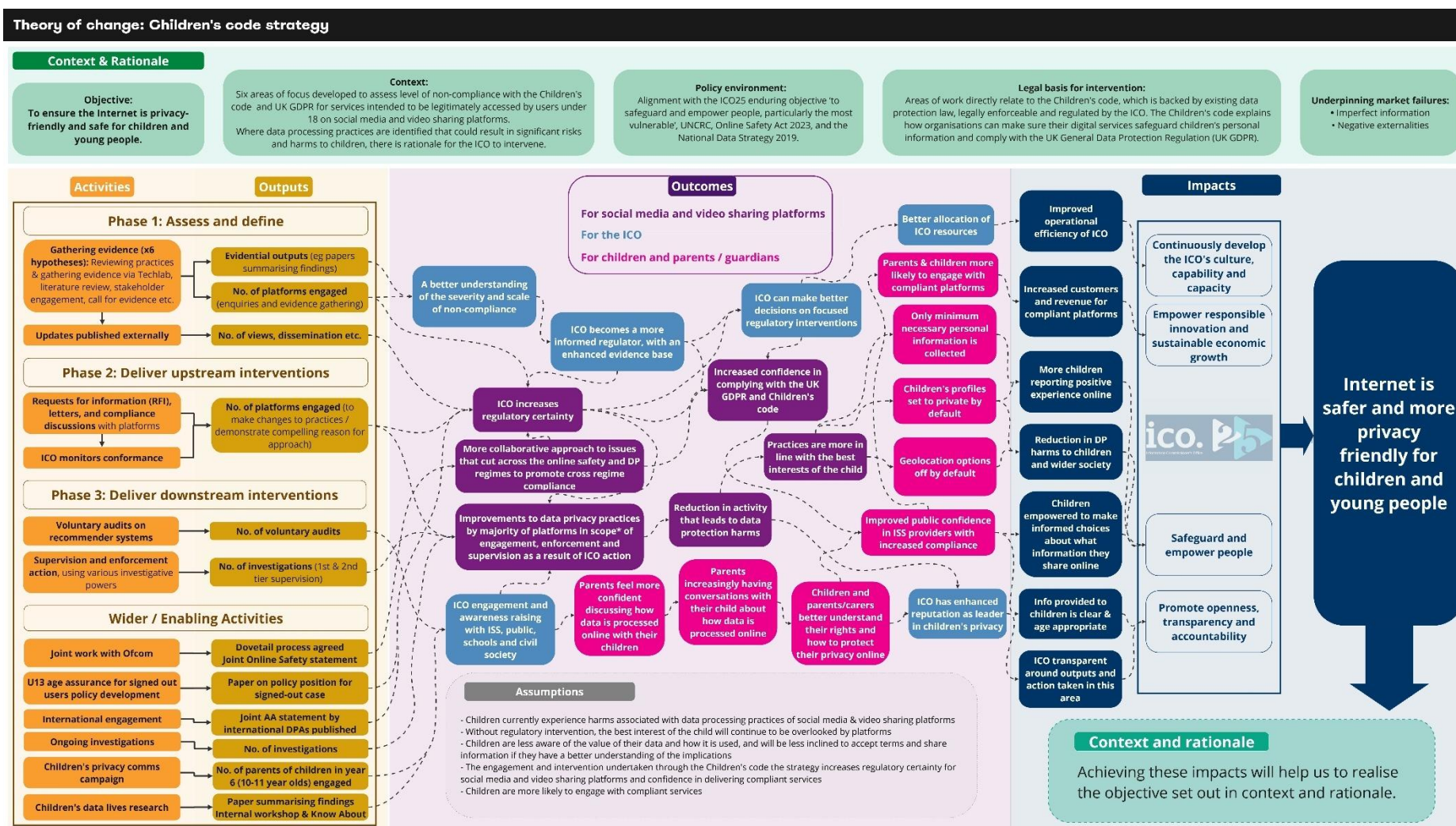
Source: ICO analysis.

The extent to which the CCS has delivered its intended activities, outputs, outcomes and impacts is reviewed within Sections 4 and 5 of this report.

The ToC visual was tested with those involved in the delivery and management of the CCS and has been iteratively updated to reflect the dynamic nature of the CCS as our understanding of the intervention areas evolved over the course of delivery.

A visual summary of the ToC is provided in Figure 1 below.

Figure 1: CCS Theory of Change



Source: ICO analysis.

4. CCS implementation

This section reviews the inputs and resources used to deliver the CCS during its first year of operation, the activities that were carried out and the outputs that were delivered.

4.1. What resources were used to deliver the CCS during its first year of operation? (inputs)

The CCS has been delivered as a cross-office programme of work, involving 45 members of staff, across 12 ICO departments (assurance, corporate communications, economic analysis, enterprise, intelligence, international, investigations, legal service, project management office, prioritisation, regulatory policy projects and technology) and a programme director.

Based on the estimated time committed from each department to the CCS, this aggregates to around 22 FTE staff.¹⁵ This represents a significant resource commitment over the last year.

Beyond staff resources there have been no wider budgetary requirements in the first year of operation of the CCS. However, it was noted that a wider organisational investment in a dataset to aid understanding of UK online audiences has fed into wider evidence collection for the CCS and that there have been small expenses associated with the app testing (eg purchase of sim cards for phones).

4.2. What activities have been delivered through the CCS to date?

Key activities delivered to date align with what was set out in the CCS theory of change. The activities that have been delivered to date are set out below.

4.2.1. Assess and define

The CCS was published in April 2024. Research was undertaken and evidence was collected to review the practices of the 34 SMPs and VSPs in scope of the CCS in relation to each of the six areas of focus. This involved creating accounts using proxies for children of different ages to

¹⁵ This is a best estimate based on internal resource tracking, collated in April 2025.

replicate the sign-up processes that children would follow, observing key account settings and privacy information presented to child users (but did not involve any interaction with other users).

Alongside this, a review of a range of academic, regulatory, governmental and civil society sources was undertaken. Subsequently, a call for evidence¹⁶ was launched to gather further evidence on two of the areas of focus (where the process of gathering evidence was more complex), and stakeholder engagement was undertaken. Further evidence was also gathered through teach-ins from other digital regulators and age assurance providers, and wider desk research (eg into state of the art age assurance technologies).

4.2.2. Deliver upstream interventions

Across all areas of focus, frameworks were developed to assess the potential risks associated with each of the platforms in scope and inform subsequent decisions regarding regulatory intervention. The frameworks were informed by the research and evidence gathered for each area of focus.

A range of upstream interventions were undertaken including engagement with platforms, sending letters to outline ICO expectations, sending requests for information (RFIs), and carrying out compliance discussions.¹⁷

As a result of the assess and define stage and initial interventions, two updates were published (in August 2024¹⁸ and March 2025¹⁹), outlining progress with the CCS and improvements observed following the initial CCS interventions. The most recent update included a table of

¹⁶ ICO (2024) Children's code strategy call for evidence. Available at: <https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/2024/10/ico-consultation-on-the-children-s-code-strategy-call-for-evidence/> (Accessed 21 July 2025).

¹⁷ See Annex D for more detail on letters and RFIs.

¹⁸ ICO (2024) Children's code strategy progress update – August 2024. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/children-s-code-strategy-progress-update/> (Accessed 22 July 2025).

¹⁹ ICO (2025) Children's code strategy progress update – March 2025. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/children-s-code-strategy-progress-update-march-2025/> (Accessed 22 July 2025).

observations²⁰ (also known as the comparison matrix) which outlined high-level findings from the review of SMPs and VSPs, and a series of case studies illustrating the different approaches taken to providing age assurance or age-appropriate experiences for children by organisations.

The publication of CCS updates could be seen as an upstream intervention, eg the use of the table of observations which has helped with deterrence effects and to drive change (see further detail in Section 6.2.4 of the report).

4.2.3. Deliver downstream interventions

Downstream intervention undertaken included use of information notices (INs),²¹ and the launch of two new investigations.

At the time of the interim impact review, two platforms had been invited to participate in a voluntary audit of recommender systems (which was one of the activities outlined in the CCS theory of change), but both had declined. Both platforms instead engaged with the ICO to explain more about how their recommender systems work and some of their governance practices.

Use of upstream and downstream regulatory interventions has been bespoke and tailored. For example, while use of letters to set expectations were judged to be effective for issues that were more straightforward to address, use of engagement and the launch of an investigation was implemented for more complex issues. Further detail is provided in Section 7.2 regarding the effectiveness of the range of regulatory tools used in terms of efficiencies and driving impact.

²⁰ ICO (2025) Children's code strategy progress update, Annex: Table of observations. Available online at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/children-s-code-strategy-progress-update-march-2025/annex-table-of-observations-from-our-review-of-a-sample-of-social-media-and-video-sharing-platforms/> (Accessed: 20 June 2025).

²¹ See Annex D for more detail on INs.

4.2.4. Wider and enabling activities

A range of wider activities have been delivered, including joint work with Ofcom, international engagement, speaking at various events and the completion of two iterations of Children's Data Lives research.²²

Activities across the phases outlined above have not necessarily been undertaken in a linear order from evidence gathering, to upstream interventions, to more downstream interventions where required. Rather, it has depended on a case-by-case analysis of the most appropriate course of action in the circumstances.

4.3. What outputs has this achieved?

Table 4 lists the outputs from the theory of change and presents evidence of what has been achieved from April 2024 to May 2025.

- It shows that a range of outputs have been delivered through the assess and define phase, including information and insights gathered from most platforms in scope of the CCS. This progress indicates that **the CCS is building internal knowledge, which can help the ICO become a more informed regulator** (as per the intended outcome).
- The delivery of upstream interventions led to engagement with almost all platforms. This has contributed to **raising awareness** and encouraging **improvements to data privacy practices**.
- Reflecting the targeted, evidence-based decisions regarding downstream intervention, these were only deemed necessary for a subgroup of platforms in scope. For this reason, the outputs of this phase involve only a few organisations.

The outputs listed in Table 4, as per the intended route to impact, represent the early stages of the casual chain reducing data protection harms making the internet safer for children. We discuss the effectiveness of the outputs in driving the intended outcomes in Section 5.

²² ICO (2024) Children's data lives research. Available at: <https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/research-and-reports/children-s-data-lives-research> (Accessed 21 July 2025).

Table 4: What has been achieved April 2024 – May 2025

Phase	Outputs ²³	CCS total	Performance against what was expected
Assess and define (phase 1)	No. of responses to call for evidence	20	66% of the target of 30 responses ²⁴
	No. platforms that already had some good practice in place in relation to at least one area of focus ²⁵	13 (10 had previously been RAG-rated amber or red on that area of focus)	This represents 41% of platforms engaged – it improved the ICO's understanding of the severity and scale of non-compliance, but also suggests gaps in information used to RAG-rate platforms prior to intervention
	No. of age assurance teach-ins	4	The knowledge shared made the ICO a more informed regulator
Deliver upstream interventions (phase 2)	No. of platforms engaged (directly in relation to CCS areas of focus and in relation to the comparison matrix)	32 ²⁶	The ICO engaged with almost all platforms in scope, raising awareness and encouraging improvements
	No. of platforms that the ICO raised concerns with ²⁷	17	This was a reactive output, so it's not possible to compare to expected performance
	No. of platforms that were sent RFIs	24	This was a reactive output, so it's not possible to compare to expected performance

²³ See Annex D for more detail on RFIs, INs, and letters.

²⁴ Note: this target was set by the ICO's strategic communications department based on past figures for similar calls for evidence and what was expected might be possible given the focus of the call for evidence.

²⁵ This was assessed during direct engagement (phases 2-3).

²⁶ Three platforms reviewed in phase 1 were not contacted, and one platform was added during phase 2.

²⁷ Concerns could be raised over correspondence or during a meeting.

	No. of platforms that responded to RFIs	23	Responses received represent 96% of the RFIs sent – high response rate
Deliver more downstream interventions (phase 3)	No. voluntary audits on recommender systems	0	2 platforms were offered audits and refused them, preferring to have conversations instead
	No. of platforms that were sent INs	4	This was a reactive output, so it's not possible to compare to expected performance
	No. platforms under compliance monitoring	1	This was a reactive output, so it's not possible to compare to expected performance
	No. new investigations	2	This was a reactive output, so it's not possible to compare to expected performance
Wider and enabling activities	No. of relevant investigations predating CCS – closed during the period	4	This was a reactive output, so it's not possible to compare to expected performance. It is expected that it has helped to improve regulatory certainty.
	No. of relevant investigations predating CCS – still open	1	This was a reactive output, so it's not possible to compare to expected performance

Source: ICO analysis.

Outputs from wider and enabling activities included:

- an online safety statement published jointly with Ofcom (published May 2024);²⁸
- a joint statement on a common international approach to age assurance (published September 2024), which has been signed by

²⁸ ICO and Ofcom (2024) A joint statement by Ofcom and the Information Commissioner's Office on collaboration on the regulation of online services. Available at: <https://ico.org.uk/media2/migrated/4029425/joint-statement-ofcom.pdf> (Accessed 1 July 2025).

11 DPAs (including the ICO) on four continents and remains open for others to sign;²⁹

- research reports from the Children's Data Lives research;³⁰
- publishing a summary of responses to the CCS call for evidence;³¹
- publishing a blog from the ICO's Deputy Commissioner for Regulatory Policy regarding protecting children's data in a digital world;³²
- hosting a side event at the Global Privacy Assembly 2024 where the ICO's Deputy Commissioner spoke about the ICO's work under the CCS to international audiences (October 2024);
- delivery of an ICO-Ofcom joint presentation on age assurance at the Global Age Assurance Summit 2025 (April 2025); and
- extensive coverage in mainstream media channels of the communications programme announcing changes achieved at that point and investigations into Reddit, Imgur and TikTok.³³

Monitoring of social media posts about children's privacy suggests good levels of public awareness of and engagement with the topic. This is covered in more detail in Section 5.

²⁹ ICO (2024) Joint statement on a common international approach to age assurance. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/joint-statement-on-a-common-international-approach-to-age-assurance/> (Accessed 1 July 2025).

³⁰ ICO (2024) Children's data lives research. Available at: <https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/research-and-reports/children-s-data-lives-research> (Accessed 21 July 2025).

³¹ ICO (2025) The ICO's response to the Children's code strategy call for evidence, Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/children-s-code-strategy-progress-update-march-2025/the-ico-s-response/> (Accessed: 3 July 2025).

³² ICO (2025) Protecting children's data in a digital world. Available at: <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2025/02/protecting-children-s-data-in-a-digital-world/> (Accessed: 2 Jul 2025).

³³ ICO (2025) Investigations announced into how social media and video sharing platforms use UK children's personal information. Available at: <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2025/02/investigations-announced-into-how-social-media-and-video-sharing-platforms-use-uk-children-s-personal-information/> (Accessed 1 July 2025).

5. Outcomes and impacts – driving change

This section outlines findings relating to outcomes and impacts to date of the CCS. This includes a review of extent to which each of the areas of focus for the CCS have progressed against what they set out to achieve by the interim stage (midway through the two-year strategy) and key outcomes and impacts to date achieved by the CCS overall.

This section also provides evidence from interviews with three SMPs/VSPs that the ICO has directly engaged with as part of the CCS, which have informed case studies. Given the point in time for this interim impact review, our findings in places are limited to early and intermediate outcomes. However, these can be a useful indication of potential longer term outcomes and impacts.

5.1. Outcomes and impacts relating to the CCS areas of focus

5.1.1. Changes relating to each area of focus




The intervention delivery activities outlined in Section 4.2 and the achieved outputs discussed in Section 4.3 have led to an increase in SMPs and VSPs conforming with the UK GDPR and Children's code. As Table 5 below shows, for focus areas 3, 4, 5 and 6 a large proportion of platforms engaged with have either made changes or are planning to make changes to improve their conformance, which could suggest an increase in confidence in complying with the UK GDPR and the Children's code.

At this stage, activities delivered in relation to focus areas 1 and 2 have not yet driven any platforms to make changes to improve their practices. Activities to date in these areas have focused on enhancing the ICO's understanding of the data processing elements associated with recommender systems and the level of risk associated with different platforms. This research and evidence gathered in the assess and define phase informed the launch of an investigation³⁴ to examine how TikTok

³⁴ ICO (2025) Available at: [Investigations announced into how social media and video sharing platforms use UK children's personal information | ICO](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/joint-statement-on-a-common-international-approach-to-age-assurance/) <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/joint-statement-on-a-common-international-approach-to-age-assurance/> (Accessed 1 July 2025).



uses personal information of 13–17-year-olds in the UK to make recommendations to them and deliver suggested content to their feeds.

Table 5: Number of platforms that made changes and nature of changes by area of focus, as of 31 May 2025

Area of focus	No. platforms engaged	No. platforms that made changes	Nature of changes made	No. platforms planning changes	Updates on other platforms
 1-2: recommender systems	7	0	While areas 1 and 2 have not yet driven any platforms to make changes, research and evidence gathered has helped to improve the ICO's understanding of risks relating to use of personal data in recommender systems, which has informed investigative work now underway.	0	<ul style="list-style-type: none"> Engagement ongoing: 7 platforms.
 3: targeted advertising	21	4 ³⁵	<ul style="list-style-type: none"> No personalised advertisements to u18s; advertising to children aged 13-17 will only use minimal information categories; and additional privacy enhancing measures. 	1	<ul style="list-style-type: none"> Changes not required: 6 platforms; and engagement ongoing: 10 platform.
 4: profiles private by default	21	4 ³⁶	<ul style="list-style-type: none"> Additional/enhanced safeguards including notifications and warnings; and accounts private by default. 	7	<ul style="list-style-type: none"> Changes not required: 3 platforms;

³⁵ This includes one platform that made changes that cannot be attributed to the CCS.

³⁶ This includes one platform that made changes that cannot be attributed to the CCS.

						<ul style="list-style-type: none">• descope: 1 platform;• left UK market: 1 platform; and• engagement ongoing: 5 platform
	5: geolocation	13	4	<ul style="list-style-type: none">• Stopped processing precise location of u18 users;• stopped automatically prepopulating users' profiles with location information;• removed country-level location from user biographies; and• geolocation tracking off as default for u18 users.	0	<ul style="list-style-type: none">• Descoped: 1 platform;• left UK market: 1 platform; and• engagement ongoing: 7 platform
	6: age assurance	12	2	<ul style="list-style-type: none">• Blocked accounts without date of birth to prompt account holders to supply date of birth; and• applied all aspects of the Code to its platform, so doesn't need to implement age assurance.	2	<ul style="list-style-type: none">• Left UK market: 1 platform; and• engagement ongoing: 7 platform.

Source: ICO analysis.

5.1.2. To what extent has each area of focus achieved what it set out to by this stage?

Across all areas of focus, initial objectives have either been partially or substantially met. This has been supported by effective use of risk assessment of services in scope, intelligence gathering and engagement, as seen below.

Areas 1 and 2 developed a framework to assess the potential risks of data protection harms for children associated with the collection, use, storage and processing of personal data by recommender systems on the platforms in scope of the CCS. The findings were used to drive engagement and triggered an investigation into one of the platforms in scope of the CCS.



Areas 3 and 4 succeeded in raising standards across several SMPs and VSPs, through improvements in privacy practices related to profiling for targeted advertising and default privacy settings, which have enhanced platform compliance.



Area 5 generated key insights into geolocation risks and recommendations resulting in cross-departmental collaboration within the ICO and external engagement with platforms.



Area 6 demonstrated progress towards prompting platforms to make changes to ensure appropriate age assurance measures are in place or to lower the data protection risks on their platforms by applying the standards of the code to all users. Following phase 1 engagement, one platform is planning to implement age assurance measures, another is seeking to apply standards of the code to all users, and another organisation has been referred for further investigation.



Table 9 in Annex C: provides further detail on the findings for each area of focus, including progress against the anticipated theory of change, any unanticipated outputs/outcomes and the extent to which any outcomes identified can be attributed to the CCS area of focus, relative to any wider factors that may have contributed.

Adaptability and strategic realignment

Several areas of focus saw objectives evolve as new risks or evidence emerged. For example, area 6 shifted from focusing on ‘platforms processing the data of under 13s unlawfully with consent as their lawful basis’, to ‘platforms processing the data of under 13s unlawfully’ after identifying in the evidence gathering stage that a large number of services rely on a different lawful basis (other than consent) to provide services to users.

For areas 1 and 2, the initial objectives were to encourage developers to design services with the best interest of the child in mind, and in a way that would not lead to children spending excessive time online. As the workstream progressed to an investigation, the strategic objectives were updated to reflect the risks identified and to deliver more targeted regulatory action. For example, the updated strategic objectives include a focus on reducing the risk of harm facing children, from the processing of their personal data in recommender systems on a key social media/video sharing platform and further reducing the risk of harm to children by clarifying for the market how data protection law applies to recommender systems.

Affected groups





The CCS ToC outlined how the ICO anticipated that the CCS would affect different stakeholder groups (see Section 3.1.4). Below, we review the ways in which different groups have been affected by the CCS in practice to date and how this compared to what was anticipated in the ToC.

Initial evidence suggests that stakeholder groups have been affected as expected in the ToC, though we aim to gather further evidence as part of the final impact review to be able to assess the extent to which some of the longer term outcomes and impacts expected for external stakeholders (eg children, parents and guardians) are materialising in practice. Further detail on how each stakeholder group has been affected is provided in Table 6 below.

Table 6: How stakeholder groups have been affected

Stakeholder group	How they’ve been affected so far
 Children, parents and guardians	<p>There are early signs of the positive changes expected in the CCS ToC, for example through platforms improving their default settings and privacy practices, giving children greater</p>

autonomy and control of their data. While these improvements are expected to benefit children, we do not yet have evidence to confirm how these changes are being experienced by children, or any direct evidence showing how they have affected parents and guardians' confidence or awareness.

	SMPs and VSPs	The ICO has directly engaged with 32 platforms as part of the CCS. This has particularly affected the compliance and legal teams within these platforms, especially where information notices were involved. As outlined in Section 5.1.1 above, a large proportion of platforms engaged with have either made changes or are planning to make changes to improve their conformance with the Children's code, in line with what was expected in the CCS ToC.
	Other similar services	There is initial evidence of deterrence effects in the market, where platforms beyond those directly targeted by CCS interventions have made changes to improve conformance with the Children's code. Section 6.2.4 of this report provides further detail on this.
	Civil society groups and relevant charitable organisations	The CCS has led to positive reputational impacts for the ICO from civil society groups (see section 5.2.4 below for further detail on this).
	Internal stakeholders	As set out in Section 4.1, the CCS has required significant cross-office resource from the ICO during the first year of delivery. The research and evidence gathered as part of the CCS has enabled the ICO to become an informed regulatory, with an enhanced evidence base to make better decisions on regulatory interventions. Section 5.2.2 below provides further detail on this.

Source: ICO analysis.

5.2. CCS aggregate level outcomes and impact

5.2.1. To what extent has the CCS as a whole delivered the outcomes and impacts anticipated at this stage?

Given that this is an interim impact report, **it has not yet feasible or possible to evidence some of the longer term outcomes and impacts anticipated in the CCS theory of change**, such as:

- improved operational efficiency of the ICO;
- increased customers and revenues for compliant platforms;
- more children reporting positive experiences online; and
- children empowered to make informed choices about what information they share online.

This feasibility is driven by a number of factors, such as:

- some of the CCS activities are still in the early stages (such as the investigations launched in March 2025, and the Children's privacy communications campaign expected to launch later this year) and it is not yet possible to measure results associated with these activities (eg the extent to which parents feel more confident discussing how data is processed online with their children); and
- reflecting the need for proportionate and timely research in line with organisational resources, research with children and parents to support impact measurement is scheduled for later 2025.

However, **the evidence collected to date suggests that the CCS is on track with the anticipated route to impact**, with several examples provided of progress made against some of the key early and intermediate outcomes and impacts in the CCS theory of change. This includes progress against the following early and intermediate outcomes and impacts:

- ICO becomes a more informed regulator, with an enhanced evidence base;
- reduction in data protection harms to children and wider society;
- enhanced reputation as a leader in children's privacy;
- increased confidence amongst SMPs and VSPs in complying with the UK GDPR and Children's code; and
- increased regulatory certainty reducing the costs associated with compliance.

Below, we outline the evidence collated to date of progress against these key early and intermediate outcomes and impacts outlined in the CCS theory of change.

5.2.2. ICO becomes a more informed regulator, with an enhanced evidence base

As outlined in the outputs section above, a range of outputs have been delivered through the assess and define phase, including information and insights gathered from most platforms in scope of the CCS which has helped to inform risk assessments of services in scope. This enhanced evidence base has helped the ICO to build internal knowledge and to better understand the severity and scale of non-compliance amongst platforms in scope of the CCS, which has informed the focus and use of downstream regulatory tools.

5.2.3. Reduction in data protection harms to children and wider society

To assist in assessing the reduction in risk of data protection harms to children, we have explored the number of child users on platforms that have made changes to improve their data protection practices, following ICO intervention as part of the CCS. This represents the number of children that are likely to have been affected by the improvements made.

At least:

- **747,000 unique UK children aged 3-17** (6% of all UK children aged 3-17), including
- **519,000 unique UK children aged 13-17** (13% of all UK children aged 13-17)³⁷

were affected by changes made by platforms, where the changes are at least partly attributable to the CCS. Across all platforms that have

³⁷ These estimates are based on Ofcom 2023 COBA survey (see <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/data/statistics/2025/childrens-media-literacy-tracker-2024/coba-survey-2024---data-tables.pdf?v=393317>) figures for the share of children aged 3-17 using social media apps or websites, and ONS mid-2023 UK population estimates (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>). Our estimates give a minimum figure, to avoid double counting across platforms. As they combine different sources of data with their own limitations, they should be interpreted with caution.

made or are planning to make changes that are at least partially attributable to the CCS, up to 3 million child users in total (aged 3-17) could be affected.³⁸ Measuring the direct impact on this population can be challenging. Because some children use more than one platform, this figure does not represent individual children in the population.

5.2.4. Enhanced reputation as a leader in children's privacy

In 2023, the ICO's Children's code evaluation³⁹ found that the code's pioneering approach had gained a level of international recognition and influence that wasn't anticipated and had driven change globally. **The CCS has continued to build on this platform and enhance the ICO's reputation as a leader in children's privacy.** From April 2024 to May 2025, the Commissioner has spoken about CCS work at 21 events, including four international events:

- Panel at Regulation of AI, Internet and Data (RAID) in Brussels, Belgium;
- Panel at CPDP Data Protection Day conference in Brussels, Belgium;
- IAPP Global Privacy Summit in Washington DC, USA; and
- NZ Privacy Week in Wellington, New Zealand (virtual).

National events have included regulatory panels, keynote speeches at data protection conferences, civil society roundtables, guest lectures, and interviews.

This has been supported through the communication of the CCS work on public platforms, including our website and social media, as demonstrated by the following evidence:⁴⁰

³⁸ This includes 2 million child users of the platforms that have made changes to date, and a further 1 million users of platforms that are planning changes.

³⁹ ICO (2023) Children's code evaluation. Available online at: <https://ico.org.uk/media2/about-the-ico/documents/childrens-code/4025494/childrens-code-evaluation-report.pdf> (Accessed 1 July 2025).

⁴⁰ ICO analysis, including analysis conducted using Brandwatch.

- The children's privacy announcement of March 2025,⁴¹ which included the announcement of new investigations,⁴² coincided with an increase in the share of consumers recalling that the ICO had been in the news the previous week. Around 2.7% of the business and 1% of the consumer responses specifically mentioned the children's privacy announcement. The ICO will continue to track this to monitor how consumer recall evolves over time.
- There has been an uplift in online discussion about children's online safety (including privacy and content) over the past year. The discussion mentioning the ICO has more than doubled, meaning the ICO accounted for slightly more of the overall discussion over the past year than it did over the previous year.

It has also been supported by our the ICO's international work, including writing and signing a joint statement⁴³ on a common international approach to age assurance, which has been signed by 11 DPAs (including the ICO) on four continents and remains open for others to sign. This helps to ensure there is international regulatory alignment to provide businesses with clear expectations and to reduce harms for children across several jurisdictions. From an international perspective, anecdotal evidence suggests that the CCS has helped to continue to build the ICO's international influence in this space.

Publishing a strategy and reporting on progress with its implementation has enhanced external communications and transparency. Civil society has acknowledged the improved openness of the ICO, with some public recognition following the March 2025 progress update. The ICO's approach to naming platforms within the CCS updates and publishing a table of observations from the review of a sample of SMPs and VSPs was

⁴¹ ICO (2025) Children's code strategy progress update – March 2025. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/children-s-code-strategy-progress-update-march-2025/> (Accessed 2 July 2025).

⁴² ICO (2025) Investigations announced into how social media and video sharing platforms use UK children's personal information. Available at: <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2025/02/investigations-announced-into-how-social-media-and-video-sharing-platforms-use-uk-children-s-personal-information/> (Accessed 1 July 2025).

⁴³ ICO (2024) Joint statement on a common international approach to age assurance. Available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/joint-statement-on-a-common-international-approach-to-age-assurance/> (Accessed 1 July 2025).

seen to support this. For example, 5Rights welcomed that the ICO named the companies it is investigating and that the ICO provided a summary of actions taken under the code.⁴⁴

5.2.5. Increased confidence amongst SMPs and VSPs in complying with the UK GDPR and Children's code

The SMPs/VSPs interviewed to inform the interim impact review reported that engagement as part of the CCS and the CCS published table of observations had helped to **enhance their confidence in complying with the UK GDPR and Children's code** (though one of the platforms noted quite strong levels of confidence prior to the CCS as well).

Feedback from one platform indicated challenges in identifying the differences and alignment between the expectations of the Children's code and the Online Safety Act, in part due to the volume of regulatory text. However, engagement with both regulators (the ICO and Ofcom) had been positive and had enhanced understanding of expectations.

5.2.6. Increased regulatory certainty reducing the costs associated with compliance

There is some initial evidence from interviews with platforms, as part of this review, that suggests increased regulatory certainty as a result of the CCS is reducing the costs associated with compliance. While **all platforms interviewed had incurred costs associated with compliance** (eg time and costs associated with adjusting products to enhance compliance), **these costs tended to be borne at the front-end** and were not long-term/ongoing costs.

All platforms interviewed also highlighted benefits associated with the changes made to improve compliance, with one explicitly noting that the value added exceeded the costs incurred. The platforms stated that ICO resources, engagement and publications helped to enhance regulatory certainty, and some noted that specific best practice examples and recommendations made had saved time and costs around deciding on changes to be made to comply.

⁴⁴5Rights (2025) TikTok, Reddit and Imgur investigated for UK Age Appropriate Design Code breach. Available at: <https://5rightsfoundation.com/tiktok-reddit-and-imgur-investigated-for-uk-age-appropriate-design-code-breach/> (Accessed: 1 July 2025).

Some platforms highlighted challenges in regulatory certainty associated with operating across multiple jurisdictions, with different legislation and regulation in place, and the overlap between the work of digital regulators in the UK (notably the ICO and Ofcom, in relation to the Children's code and the Online Safety Act). Recent collaborative approaches with Ofcom on issues that cut across the online safety and data protection regimes and the publication of a joint statement on a common international approach to age assurance (outlined in Section 5.2.4) are expected to help increase cross-regime compliance and regulatory certainty further, though there is not yet evidence of the impact of these activities.

Further details on the interviews with platforms can be seen in the case studies in section that follows.

5.3. Case study impact evidence

The case studies below present the views of three platforms interviewed as part of the research for this review. The case studies demonstrate the impacts on three organisations that have directly engaged with the ICO as part of the CCS.

Impact case study 1: Dailymotion

Dailymotion is a French online video sharing platform available worldwide, including operations in the UK. Dailymotion describes its services as both B2B activities (where media outlets use the firm's technology to add video players onto their websites) and B2C activities (allowing users to view, upload and share videos). The firm indicated that it has a strong awareness of the ICO and the Children's code strategy, and that it aims to be a safe platform, which protects all users, including children.

Changes made to improve compliance with code standards

Dailymotion stated that it has put several measures in place to meet code standards over the past year. Examples of two changes made following engagement with the ICO as part of the CCS work include:

- **Implementing new privacy and transparency measures**, including adding a notification which pops up for children before they upload videos, to remind them not to disclose personal information.
- **Making a summary version of terms and conditions and the platform's privacy policy available**, which uses language which is more understandable to children (ie less legal and technical language).

While these changes were deployed initially in the UK, they have also been applied worldwide, meaning that the changes are also benefiting users internationally beyond the UK, and help the platform to comply with legislation in other jurisdictions (the EU, USA etc).

Impacts of the CCS on Dailymotion

Dailymotion highlighted that engagement with the ICO had helped to increase the firm's understanding of privacy by design and how this can be applied. This has enabled the firm to make some 'easy fixes', which it would not have considered otherwise, and has **made the platform more child-friendly and safer for their child users**. Dailymotion thought these changes could **improve user trust**, so it is seen as positive for all stakeholders.

The updates made had cost a few hours of the team's time, however **Dailymotion believed that the added value was much greater than any costs incurred**. While Dailymotion has not tracked the number of users that have seen the new pop-up privacy notifications or simplified terms and conditions, the firm thought that **these changes would be beneficial for all users** as they now have a version of their terms (including how data is used, what to do in case of any issues etc.) which is in easily accessible language that everyone can understand.

Attribution of changes to the CCS

In the absence of the CCS, Dailymotion noted that it would have still sought to introduce measures (as this is in line with its position as being a safe place for users), but these likely would have taken longer to implement and the changes made would have been different. While some of the changes seem obvious now, Dailymotion noted that it had not thought of them prior to engaging with the ICO. Therefore, **the changes and positive associated impacts can be attributed to the CCS**.

Engagement with the ICO has also saved time that otherwise would be spent internally discussing and identifying how best to comply with standards (through the ICO providing a concrete example or suggestion instead). Dailymotion highlighted that having direct discussions with the ICO had helped to emphasise internally that the changes should be implemented quickly. This **demonstrates the value of upstream engagement as a regulatory tool**.

Impact case study 2: X

X is a social media platform, previously known as Twitter. The ICO has engaged with X on quite a frequent basis. X reported that contact as part of the CCS aligned with the cadence of interactions experienced prior to the launch of the CCS.

Changes made to improve compliance with code standards

X has made three specific changes following engagement with the ICO, including:

- **Creating a dedicated help center for child users and parents that provides greater transparency regarding the protections afforded to minors in the UK**, which improves the privacy and transparency materials available to under 18s and acts as a catalogue of all policies in this area.
- **Removing the ability for under 18s to opt in to precise geolocation sharing.**
- **Disabled ads personalisation and no longer serving adverts to users under 18 years old.**

X noted that while the firm has always had a relatively strong level of confidence in complying with the UK GDPR and the Children's code, the progress report published, which outlined the firm's broad alignment, had been helpful from a compliance perspective and had been appreciated.

Impacts of the CCS on X

X reported that the changes made following engagement with the ICO had **led to both costs and benefits**. Most of the costs were borne upfront, in terms of engineering resources to make changes. The benefits included aligning practices with the best interests of the child and the Children's code more specifically.

In terms of the impacts on child users, while the changes represented turning off some functionalities for them, X hoped that it would be seen as a net positive in terms of online safety. The firm had not received any feedback from users on the changes made to be able to determine the impact on user experience.

Attribution of changes to the CCS

X stated that the changes were all made collaboratively in direct consultation with the ICO as part of the CCS. This followed the ICO making its priorities clear in early spring 2024 and then engaging back and forth on specific areas. X reported that this approach had worked well. In the absence of this engagement with the ICO, the firm noted that they would have made the changes to advertising anyway, to align with global policy but they were unable to speculate on whether the other changes (eg to geolocation) would or would not have been made at some stage, given that these features are reviewed annually. This suggests **partial attribution of changes to the CCS**.

Generally, X thought that the published table of observations⁴⁵ has had a positive impact. More broadly, X indicated that maintaining interaction and dialogue with a regulator is helpful in terms of **increasing regulatory certainty** and **enabling firms to better understand compliance expectations** which can then be translated to engineers, business leadership etc.

Impact case study 3: Yubo

Yubo is a social media platform founded in France, which now operates internationally. The platform describes itself as a live social discovery app. Yubo implemented age assurance in 2022 to help it to estimate the ages of its users, to provide a better and safer online experience for children using the app.⁴⁶ Yubo noted that engagement with the ICO has always been cooperative, and this had not changed as a result of the CCS, though more recently, the level of engagement had decreased.

Changes made to improve compliance with code standards

Yubo has engaged with the ICO in relation to targeted advertising, default privacy and geolocation settings. The firm noted that engagement with the ICO as part of the CCS has been helpful in informing the platform's strategy around child users, though it was not the only factor that had influenced this. Following engagement with the ICO, Yubo reported that the platform had:

⁴⁵ See footnote 20.

⁴⁶ See ICO (2025) Age Assurance Case Studies for further information. Available at: [Age assurance case studies | ICO](#) (Accessed: 03 July 2025).

- **improved documentation**; and
- **shared a DPIA with the ICO** (and found the templates provided by the ICO useful in its development).

Yubo has also recently removed advertising for child users.

Impacts of the CCS on Yubo

Yubo noted that engagement with the ICO (and other regulators) and the burden of producing documentation has required significant resources at some points. Where time is spent producing documentation, this is at the expense of focusing this resource on other compliance efforts.

A key benefit of engagement with the ICO as part of the CCS was that it had created more cross-collaboration within the firm, and improved the internal perception that this work is necessary. Yubo indicated that the CCS engagement proved a catalyst for internal conversations, driving the firm to outline processes on paper and identify improvements that could be made. While these types of discussions also occur in the absence of ICO engagement, the engagement helped the changes to be seen as a priority across the firm and to be implemented more quickly.

Yubo believed that the improvements made were focused and would improve user experience. The platform noted that they have worked hard to provide a safe environment for users. Yubo welcomed the interactions with the ICO and noted that this had **assisted them in their compliance journey** (both prior to and after the CCS launched), **helped them to improve their practices** and that **the improved documentation would be beneficial for child users**.

Attribution of changes to the CCS

While Yubo's removal of advertising cannot be attributed to the CCS (as this is not a requirement of the Children's code and was not directly recommended), the firm highlighted that the regulatory expectation to limit advertising to children had enabled the platform to make the change more quickly, without significant internal discussions. This suggests that **deterrence effects associated with the CCS influenced the firm's decision to remove advertising for children**.

6. Attribution, unintended outcomes and deterrence

This section considers factors that help understand impact further, including the attribution of outcomes and impacts observed to the CCS, whether there have been any unintended or unanticipated outcomes and evidence of deterrence effects in the market (where platforms beyond those directly targeted by the CCS interventions have become aware of the CCS and made changes to improve conformance).

6.1. To what extent can outcomes and impacts be attributed to the CCS?

Generally, staff involved in delivering the CCS indicated that they were relatively confident that the majority of changes documented throughout this report could at least be partially attributed to the CCS. Direct attribution remains challenging, where platforms do not want to publicly state that changes were made as a result of the ICO's engagement, although the timing and consistency with CCS interventions suggests the engagement is likely to have played a role in most instances, as demonstrated in the case studies in Section 5.

Other factors that may have contributed to the outputs and outcomes observed include the work of other digital regulators (particularly Ofcom), international DPAs (given that many of the platforms operate across multiple jurisdictions) and wider public perceptions and concern around children's safety online (which raises the reputational risk for platforms that may be seen to not be doing what they should in this area). This supportive public context is likely to have helped to increase the impact of regulatory tools such as the ICO's published table of observations.

6.2. Have there been any unexpected outcomes and impacts?

Several outcomes were reported that had not been anticipated in the CCS theory of change. Further details about these unexpected outcomes are provided below.

6.2.1. Market movers

Of the 34 platforms in scope of the CCS, one has left the UK market (and another appears to be in the process of leaving the UK market). While not an anticipated outcome, these are platforms with which the ICO had

raised concerns, therefore is not viewed as a negative outcome. It is not possible to assess the extent to which ICO interventions might have contributed towards these market shifts.

6.2.2. Unexpected platform usage around geolocation and advertising

Research and engagement with platforms have led to some unanticipated findings, for example:

- It was found that precise geolocation sharing was less prominent amongst platforms in scope of the CCS than expected.
- It was also found that a significant number of platforms were not advertising to children, or were only delivering contextual advertising, either due to it not being in line with their company ethos or due to regulatory challenges (particularly the case for smaller platforms that did not feel equipped to deliver advertising to children in line with regulatory requirements).

These findings help to enhance the ICO's understanding of data protection practices and risks amongst platforms in scope of the Children's code.

6.2.3. Other data privacy issues for platforms beyond the CCS

Engagement with platforms also led to increased understanding of wider issues and challenges faced by platforms. For example, it was noted that there was a limited understanding of [storage and access technologies](#). While most understood the use of cookies, other storage and access technologies used for advertising, including tags, scripts and identifiers were less well understood.

This highlighted a wider learning point (outside of the CCS), that there may be value in further work to amplify the ICO's guidance on storage and access technologies and provide more detailed instruction to platforms planning to advertise to children. Wider findings have been shared with other teams within the ICO working in these areas.

6.2.4. Deterrence effects

As outlined in Section 3.1.4, it was expected that CCS interventions and publications would increase information and regulatory certainty amongst industry, which may drive improvements on platforms beyond those directly targeted. We refer to these indirect effects on the market as deterrence effects. There is emerging evidence of deterrence effects

amongst platforms in scope of the CCS, where platforms have started making changes to improve data protection practices as a result of wider CCS activity (rather than direct intervention).

For example, platforms initially contacted about a specific area of focus or the ICO's table of observations (when it was in development) often noted that they had also made (or were planning) changes relevant to another area of focus which they had not been contacted about. This occurred for 13 out of the 32 platforms engaged and suggests that CCS activities are contributing to the creation of an environment that encourages platforms to improve how they collect and process children's data.

ICO staff observed that some platforms had already made changes prior to direct engagement with the ICO, due to knowing that the CCS was in place, and/or knowing that a table of observations would be published that would be naming platforms and listing observations by platform against key metrics. One platform interviewed for this review also highlighted how deterrence effects had informed their decision to remove advertising for children (see further details in the section below).

We will continue to explore this aspect further in the final review of the CCS, building on the initial evidence collected at this interim review stage.

7. CCS year one: initial findings and lessons learned

This section summarises the key findings from the interim impact review and lessons learned around enabling regulatory impact.

7.1. Initial findings

Across all CCS areas of focus, initial objectives have either been partly or substantially met, with activities, outputs and outcomes on track against what would be expected at this stage for five of the six areas of focus. For area 6 (age assurance) two of the three planned delivery phases were still in early stages at the time of the review.

Platforms have made changes to improve their data protection processes following engagement with the ICO for four of the six areas of focus. While areas 1 and 2 have not yet driven any changes amongst platforms, research and evidence gathered has helped to improve the ICO's understanding of risks relating to use of personal data in recommender systems, which informed the launch of an investigation.

The CCS and wider children's privacy cause structure has enabled cross-office working to undertake research, gather evidence and engage with 32 platforms. While this has been resource-intensive, it has enabled the ICO to become a more informed regulator, with an enhanced evidence base which has meant that the ICO has been able to make evidence-based decisions regarding the use and focus of downstream regulatory action.

Following CCS interventions, changes have been made by 8 of these platforms to improve their data protection practices, which have affected at least 747,000 unique UK children aged 3-17 (6% of all UK children aged 3-17), including 519,000 unique UK children aged 13-17 (13% of all UK children aged 13-17). Across all platforms that have made or are planning to make changes that are at least partially attributable to the CCS, up to 3 million child users in total (aged 3-17) could be affected. Because some children use more than one platform, this figure does not necessarily represent individual children in the population.

The CCS has demonstrated that the bespoke use of both upstream and downstream approaches to intervention is effective in driving compliance.

Generally, staff involved in delivering the CCS indicated that they were relatively confident that the majority of changes reported to date could at

least be partially attributed to the CCS. Initial evidence from platforms interviewed confirmed partial or full attribution of changes made by two platforms, and deterrence effects associated with the CCS influencing decisions regarding a change made by a third platform.

Wider and enabling activities have helped to enhance the ICO's profile as a leader in children's privacy. This has been supported by various activities and outputs including publishing the CCS progress updates, the table of observations, the Children's Data Lives research, stakeholder engagement undertaken (including hosting a side event at the Global Privacy Assembly 2024) and the extensive coverage in mainstream media channels of the communications programme announcing the TikTok, Reddit and Imgur investigations. There is also initial evidence of this contributing towards deterrence effects and supporting compliance amongst platforms in scope of the CCS (though we have not yet been able to collect any evidence to understand whether this is also contributing towards deterrence effects in the wider market).

While only a year into implementing the CCS, there is evidence of progress against the outputs set out in the CCS theory of change, and evidence of the early and intermediate stage outcomes and impacts (though at this stage, the findings are based on a limited scale of evidence). This suggests that the CCS is on track to deliver its desired impacts.

7.2. Lessons learned – enabling regulatory impact

Here we provide an overview of the key factors that have helped to enable regulatory impact to date. This includes aspects regarding the way in which the CCS has been implemented and the use of regulatory tools.

7.2.1. Research and evidence-led approach to intervention

The review of the practices of the 34 SMPs and VSPs in scope of the CCS, the literature review undertaken, the call for evidence and RAG matrices developed (to assess the level of risk associated with platforms in relation to each area of focus) have been important in enhancing the ICO's evidence base.

This approach meant that the ICO was able to act from a position of credibility and deeper understanding of the issues. This has enabled the ICO to increase regulatory certainty, take a more collaborative approach to issues that cut across the online safety and data protection regimes to

promote cross-regime compliance, and to deliver evidence-based interventions.

7.2.2. Effective use of upstream interventions to drive changes

Sending letter to platforms to raise concerns has been an effective approach in facilitating discussions with platforms and securing improvements.

The published table of observations (see the table in the March 2025 CCS progress update)⁴⁷ was seen as an effective upstream regulatory tool and as a significant shift in the ICO's approach. Publication of the CCS and progress updates has had a deterrence effect amongst the platforms in scope of the CCS (eg it was reported that some platforms had already made changes prior to direct engagement with the ICO, due to awareness that the CCS was in place).

Notifying platforms of the ICO's plans to publish the table of observations helped to open-up engagement and reportedly led to quicker, more productive conversations (including with platforms that had previously not responded to upstream interventions). It has also helped to more efficiently clarify our understanding of the practices of platforms identified as lower risk.

7.2.3. Bespoke use of downstream regulatory interventions

The CCS has demonstrated that the bespoke use of both upstream and downstream approaches to intervention is effective. With some platforms, upstream engagement has been useful and has led to positive changes and improvements to practices, but having the ability to escalate where required has also been useful. Use of letters to raise concerns was reported to have worked well for issues that were more transparent and simpler to address (eg default settings), whereas for more complex issues (eg recommender systems), downstream interventions have been used.

Being able to use the ICO's regulatory tools flexibly and in a tailored way like this, after careful consideration of the issues has worked well. This

⁴⁷ ICO (2025) Children's code strategy progress update, Annex. Available online at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/protecting-childrens-privacy-online-our-childrens-code-strategy/children-s-code-strategy-progress-update-march-2025/annex-table-of-observations-from-our-review-of-a-sample-of-social-media-and-video-sharing-platforms/> (Accessed: 20 June 2025).

demonstrates the value of drawing on the range of regulatory tools available to the ICO to drive efficient and effective changes in the markets we regulate.

7.2.4. Publicising the CCS and providing regular public updates on progress

The progress updates, ability to name platforms and transparently outline ICO actions taken within these has had a positive impact on the ICO's standing in children's privacy through demonstrating the actions and progress in this area.

Civil society groups have reacted reasonably positively to this publication, which suggests that it may have helped to alleviate the earlier perceptions that the ICO's activities related to the code were not progressing at the scale or rate they would like to see (as referenced in the findings of the ICO's March 2023 Children's code evaluation).⁴⁸

7.2.5. Focusing on SMPs and VSPs during the first year of delivering the CCS

The ICO agreed to prioritise data processing harms by SMPs and VSPs in year one of the CCS, as the majority of children use social media and video sharing platforms⁴⁹ and the strategy identified that while we have seen progress made by such platforms, more needed to be done to keep children's personal information safe. This has helped to drive focused research, evidence gathering and interventions, ensuring that the work was well-targeted and not as diluted as it might otherwise have been.

7.2.6. Coordination effects driven by the cause structure

Coordination effects have facilitated cross-team working and resourcing, due to this being seen as a priority workstream across the organisation (while previously, there may have been more of a focus on the priorities of each respective department). This has meant that the CCS has been able to draw on the right expertise at the right time, has helped to keep

⁴⁸ ICO (2023) Children's code evaluation. Available online at: <https://ico.org.uk/media2/about-the-ico/documents/childrens-code/4025494/childrens-code-evaluation-report.pdf> (Accessed 20 June 2025).

⁴⁹ See page 11 - https://www.ofcom.org.uk/data/assets/pdf_file/0027/255852/childrens-media-use-and-attitudes-report-2023.pdf (Accessed 20 June 2025).

momentum driving the organisation to build our knowledge in this area and enhance our ability to make evidence-based decisions.

Workshops with different teams and board decisions have also helped in providing a steer where there were different opinions on interventions. Having this single point of clarity was reported to have been helpful.

7.2.7. Building in time and processes to monitor and review progress and impact

The approach to this interim review has allowed time to reflect and ask questions about what has been delivered, progress against outputs and outcomes and whether there are opportunities to do more or deliver interventions differently to drive greater impact. The insights from this will be considered as part of an internal process review.

7.3. Next steps for the review

At present, a final impact review is currently planned in the latter half of 2026/27, to capture additional impact evidence as the CCS completes its two-year delivery plan. This will be subject to resourcing, continuation of the CCS and budget availability. The final impact review is expected to expand the evidence base, including further primary research with stakeholders (see Annex B: for further details regarding sources of evidence).

Annex A: Research questions for the review

A.1 Research questions

The interim impact review predominantly focuses on impact evaluation to understand what difference the CCS has made.⁵⁰ The review focuses on two overarching research questions:

- Process: what can be learned from how the CCS has been delivered?
- Impact: what difference has the CCS made to date?

It is important to recognise that many of the changes targeted by the CCS are behavioural, which means that it can take time for the impacts to materialise. This report focuses on capturing evidence of outputs and early outcomes and impacts, to confirm whether the CCS is progressing along the route to impact anticipated (as set out in the theory of change).

Table 7: Key research questions

Process: what can be learned from how the CCS has been delivered?	Impact: what difference has the CCS made to date?
What has worked well and less well in designing and delivering the CCS to date?	Has the CCS delivered against the outputs and outcomes set out in the ToC?
Has the CCS meant that teams have had to work differently? Have resources been sufficient?	How has the CCS affected different stakeholders? Have different groups been impacted in different ways, how and why?
How effective has the cross-office delivery approach been?	To what extent can outcomes and impacts be attributed to the CCS? What other factors have contributed?
How has context influenced delivery?	What would have happened in the absence of the CCS?
How are decisions made about what to prioritise under the CCS?	Has the CCS changed how our external stakeholders view the ICO and how they engage with us?

⁵⁰ Sitting alongside the review is an internal exercise focusing on an assessment of process learnings to reflect on what can be learned from how the CCS was delivered.

How well is the management and governance of the CCS working overall?

Have there been any unanticipated or unintended outcomes as a result of the CCS (positive or negative)?

What can be learned from the first year of delivering the CCS? Would you have done something differently, based on what you now know?

What learning is there about how we use our regulatory tools to drive impact?

Source: ICO analysis.

Annex B: Evidence sources

The table below provides a list of sources that have been drawn onto inform the interim impact reviews. The evidence base draws on a mixture of qualitative and quantitative research obtained through primary research, monitoring data and desk-based review.

Table 8: Evidence streams

Evidence stream	Description	Timing
Monitoring: impact dashboard	Drawing on monitoring data and the analysis of number of children affected (outlined below) to feed into a PowerBI dashboard. The dashboard summarises key outputs, outcomes and impacts of the CCS to date.	First iteration of dashboard developed in February 2025. Updates and iterations have subsequently been made as appropriate and proportionate.
Analysis of number of children affected	This research will be undertaken across two phases. Phase 1: analysis of existing data to try to quantify number of child users of platforms in scope of the CCS. Phase 2: Research to model multiplier effects, to be used as a proxy measure for the number of children affected.	First iteration fed into impact dashboard developed in February 2025; analysis has subsequently been updated as required.
Interviews with a small number of SMPs/VSPs to inform case studies	Interviews with small sample of platforms that the ICO has engaged with as part of the CCS, to inform impact-focused case studies. These will explore the baseline position, confidence in conforming with the code, extent to which the CCS has driven any changes in data protection processes and practices, impacts on the organisation.	Three case studies completed between May-June 2025.
Workshops with teams involved in	Key teams involved in implementing the CCS were invited to join a series of semi-structured workshops (c.1 hour),	Five workshops completed between May-June 2025.

delivering the CCS	based around a topic guide listing key questions regarding the implementation, impact and learnings from the delivery of the CCS to date). In total, five interviews were completed which involved nine ICO departments and the Children's Strategy Director.
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Source: ICO analysis.


Further research is planned to enhance our evidence base for the final review (which is currently planned for 2026/27, based on the two-year delivery plan for the CCS). This is expected to include the following strands of research, subject to capacity and budget:

- Externally commissioned mixed-methods research, to quantify, profile and understand characteristics of information society service (ISS) providers (including those in scope of the Children's code);
- Externally commissioned survey research with children and parents/guardians;
- Additional small-scale primary research with external stakeholders (eg industry representative bodies, civil society groups, SMPs and VSPs).




Annex C: Review of progress against the theory of change for each area of focus

The table below summarises progress against the anticipated theory of change for each area of focus, any unanticipated outputs/outcomes and the extent to which any changes identified can be attributed to the CCS relative to other factors that may have contributed.

Table 9: Review against theory of change

Areas of focus	Progress against objectives	Have activities, outputs and outcomes been delivered as expected.	Unanticipated outputs/outcomes	Attribution of outputs and outcomes
1&2 	Original objectives partly met, with work ongoing. As work progressed to an investigation, strategic objectives have been updated.	On track, given complexity of this area of focus. ⁵¹ Key outputs: literature review, risk assessment of services, RFI letters sent, responses received. Key outcomes: better understanding of risks in relation to use of personal data in recommender systems, which has informed investigative work.	N/A	Outputs and outcomes were judged by the lead for these areas to be attributable to the CCS.

⁵¹ Note: one original objective was to create policy/guidance. It was decided that this would not be taken forward, following review of existing ICO guidance and codes which were judged to provide adequate guides to data processing in this area.

<p>3&4</p> 	<p>On track against objectives, expecting success measures to be met (subject to finalising engagement with two platforms and checking planned changes are delivered by four others)</p>	<p>Delivered as expected. Key outputs: review of platforms, engagement with platforms. Outcomes: better understanding of scale and severity of non-compliance; range of improvements to privacy practices from SMPs and VSPs engaged.</p>	<p>Some issues on platforms misunderstanding of advertising technologies.</p>	<p>While some platforms are unwilling to directly attribute changes to the CCS, the lead for these areas highlighted that timing and changes are closely aligned with the CCS.</p>
<p>5</p> 	<p>App testing showed no platform shared a child's precise geolocation by default. Good progress against objectives in terms of increased clarity from services following letters and changes secured from four platforms around public sharing of geolocation data.</p>	<p>Delivered as expected. Key outputs: evidence reports; RAG-rated comparison risk table; ICO briefing paper; engagement with services of concern. Outcomes: enhanced understanding of the level of risk and causation chain of harm; improvements made by four platforms.</p>	<p>A firm has exited the UK market, and one firm was found to show inappropriate content to children, which will require additional risk assessment and engagement.</p>	<p>The lead for this area highlighted that this workstream shaped policy and enhanced ICO understanding of current threats, which would not have occurred without the work in this area.</p>
<p>6</p> 	<p>Good progress made across three phases, with objectives partly met. While phases 2 and 3 are in earlier stages, this is expected given the complexity of this area of focus and that the CCS was originally set out as a two-year programme plan.</p>	<p>A mix of progress against all three phases. Four organisations have been contacted for phase 1. Phases 2 and 3 were still in early stages at the time of the review, but progress has been made in enhancing knowledge of how profiling works for age assurance and assessing which platforms present the highest risks.</p>	<p>One firm has exited the UK market (and another is reportedly in the process of leaving the UK market).</p>	<p>While wider factors such as the general international climate and the requirements of the Online Safety Act (OSA) may have contributed⁵², the lead for this area reported that it is unlikely changes achieved in phase 1 would have arisen without direct contact from the ICO through the CCS.</p>

Source: ICO analysis.

⁵² Though it was noted that the Online Safety Act (OSA) focuses on the 18-age threshold, while area 6 focuses on the 13-age threshold, meaning there is a limit to which compliance with the OSA can account for change made in relation to this area.

Annex D: Glossary

D.1 Useful terms

Intervention: we use this term to refer to the regulatory tools available to the ICO, which includes anything that changes the status quo.

Regulatory interventions can take various forms depending on the issue at hand. In this report, we refer to the spectrum of regulatory tools used by the ICO with the following categories:

- **Upstream interventions:** in the context of the spectrum these are lighter-touch tools and can be thought of as enabling and softer tools, such as education, engagement, influence, advice and guidance, letters, requests for information (RFIs), and compliance discussions. **Downstream interventions:** these should be understood as moving towards more rigid and firmer interventions on the spectrum ranging from information notices (INs), audits, compliance monitoring, investigations, and enforcement.

These categories are not mutually exclusive and often work together to achieve regulatory goals.

The ICO has multiple regulatory options when writing to platforms in scope of the CCS:

- **a letter** to outline the ICO expectations on the areas relevant for each area of focus;
- **a RFI (request for information)** that include a list of questions for the platform to answer; and
- **an IN (information notice)**, which is a legally binding notice issued by the ICO's Investigation team to platforms, requiring them to provide the requested information.

D.2 List of abbreviations

Table 10: Abbreviations used in this report and their meaning

Abbreviation	Meaning
CCS	Children's code strategy
ICO	Information Commissioner's Office
IN	Information notice
ISS	Information society service

RFI	Request for information
SMP	Social media platform
ToC	Theory of change
VSP	Video sharing platform

Source: ICO analysis.