



GPA Global Privacy and Data Protection Awards 2023

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org **no later than 9 June 2023**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection

Authority: Information Commissioners Office UK

Person completing this form: Leanne Doherty

First name

Last name

Job title: Assurance Group Manager

Email address: Leanne.doherty@ico.org.uk

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2022.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

The **Children's Code Self-Assessment Risk Tool** has been created with medium to large private, public and third sector organisations in mind.

This tool helps online service providers conduct their own risk assessment of how both the UK General Data Protection Regulation and the Children's code applies in the context of their digital service and gives them practical steps to apply a proportionate and risk-based approach to ensuring children's protection and privacy.

b. Please provide a full description of the initiative (no more than 350 words)

The risks and benefits to children that arise from data processing are heavily context-dependent, and this context varies significantly across the diverse range of sectors, technologies and organisation types covered by the code. This tool was developed to help online service providers conduct their own risk assessment of how both the UK General Data Protection Regulation (UK GDPR) and the code applies in the context of their digital service to ensure children's protection and privacy online.

Using the Menu, they can assess various identified risk areas within each code standard using a series of risk statements, risk activities and harms to children that could exist within the digital service. This tool gives users the opportunity to assess if and how these risk statements and exemplar activities could manifest in the service, and document their own assessment notes and inherent risk rating as appropriate. There are also some practical steps they may wish to consider taking to mitigate the risk and an action plan template that can be used to capture the actions they intend to take.

This tool is not designed to be 'one size fits all' and provides the opportunity for each risk to be assessed in the context of each individual online service. It allows the user to fully understand the potential risks and harms that may manifest whilst children are using their service, which is important in this digital age where it is recognised that ensuring there is a 'safe space' for children to learn and play online is paramount.

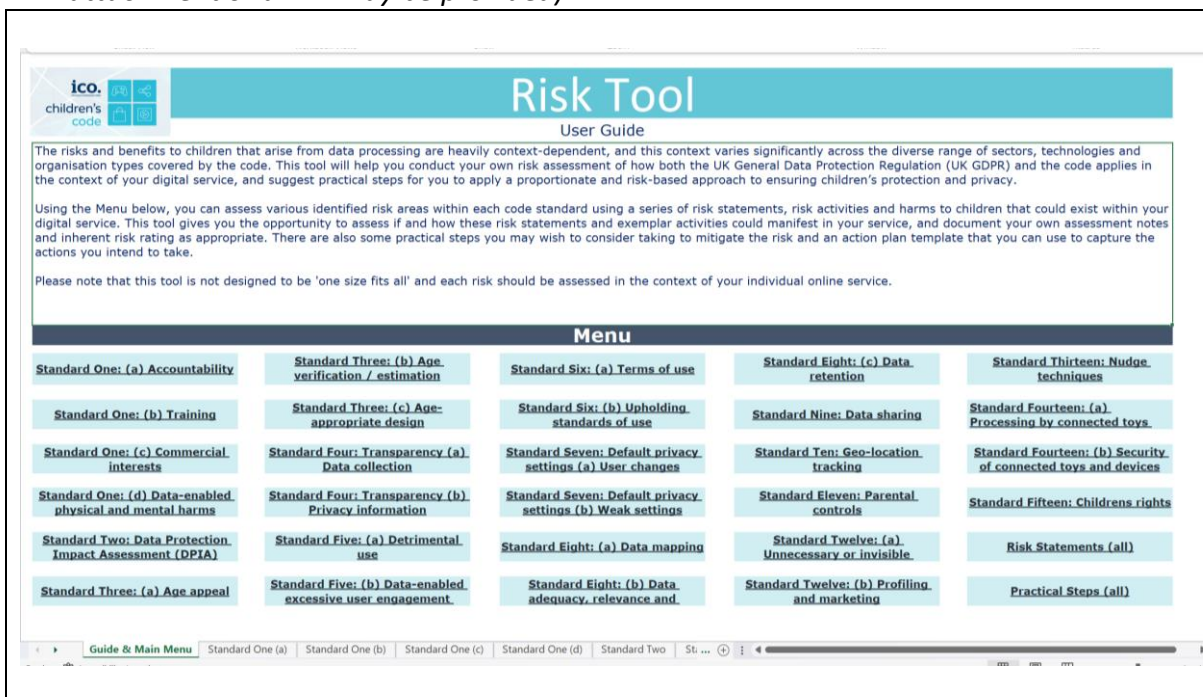
The tool can be downloaded from the ICO website and used as a working document, being updated should the online service be developed or changed during its lifecycle.

c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

Data sits at the heart of the digital services children use every day. From the moment a young person opens an app, plays a game or loads a website, personal data begins to be

gathered. For all the benefits the digital economy can offer children, we are not currently creating a safe space for them to learn, explore and play. The Children's code looks to change that, not by seeking to protect children from the digital world, but by protecting them within it. This tool is an enabler to online service providers to demonstrate their accountability in the protection of children's rights and privacy (and adherence to the code) by giving them the means to conduct their own data protection risk assessment and document the outcomes and intended mitigating actions. It also serves to highlight and support the best interests of children and is unique in its design and content. It has received very positive feedback from users, particularly in the gaming industry.

d. Please include a photograph or image, if you wish (This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)



Back to main menu

Standard Thirteen - Nudge techniques

Do not use nudge techniques to lead or encourage children to provide unnecessary personal data or turn off privacy protections. UKGDPR Articles 5 (1)(a). UNCRC Article 3 & 17.

Link to Code

Risk Assessment

13.1 Privacy-eroding nudge techniques

Risk statement: Nudge techniques leading to children providing unnecessary personal data, turning off privacy protections, or taking part in harmful online behaviours.

Exemplar Risk Activities:

- *Design features lead or encourage children to follow the designer's preferred paths in the user's decision making
- *The language used to explain the outcomes of two alternatives is framed more positively for one alternative than for the other.
- *One option is made much less cumbersome or time consuming than the alternative, therefore encouraging many children to just take the easy option
- *The service exploits unconscious psychological processes such as associations between certain colours or imagery and positive outcomes, or human affirmation needs.

Impact / Harm to Children:

- *Using techniques based on the exploitation of human psychological bias in this way goes against the 'fairness' and 'transparency' provisions of the GDPR as well as the child specific considerations set out in Recital 38.
- *Cognitive and emotional development impeded.
- *Physical development impeded.
- *Misinformation and audio-visual manipulation.
- *Exploitation of cognitive biases ("nudging").

Risk Assessment Summary	Mitigating Factors	Inherent Risk Rating	Residual Risk Rating (following action)

Standard Nine Standard Ten Standard Eleven Standard Twelve (a) Standard Twelve (b) Standard Thirteen

e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

[Children's Code Self-Assessment Risk Tool | ICO](#)

f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

Feedback quote from a gaming company:

"The risk assessment tool helped us understand better the impact on the best interests and wellbeing of child users. It helped us try to find the best approach to reduce such impact."