



GPA Global Privacy and Data Protection Awards 2025

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 16 June 2025**.

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	
Person completing this form:	Rachel	Bennett
Job title:	First name	Last name
	Intelligence Group Manager	
Email address:	Rachel.bennett@ico.org.uk / gpa@ico.org.uk (please use both email addresses for all correspondence with ICO)	

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 before 16 June 2025.
- ☒ 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)

Children's privacy is a priority area for the ICO. Our children's code strategy focuses on how social media and video sharing platforms use children's personal information.

We conducted social media and video streaming app testing to understand the real-world experiences of children.

We tested 34 popular apps on:

- Default geolocation and privacy settings,
- Targeted advertising,
- General use of children's data, and
- Age assurance measures and the use of personal data of children under 13.

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

We recognised that social media and video streaming is a rapidly evolving market. We first identified apps of interest. We selected 34 social media and video streaming platforms with Terms of Services which allow under 18s to use them. We focussed on creating accounts for a 13-17 year old and attempted sign-up as an under 13 year old so that we could have better understanding of the real-life experiences of children.

Over 4 weeks of testing we created new user accounts using proxies for children of different ages to replicate the sign-up processes that children would follow. We recorded the steps a child would need to take to set up an account, the default settings platforms offered, any privacy information provided to users and basic app functionality (including making a post).

Prior to the research started we created a walkthrough methodology, template log to record actions and series of proxy users details and email addresses. We did not interact with other users. We used proxy information to create each account with a different persona and individual contact details. We trained a small multidisciplinary team to undertake testing on real devices.

We used a mix of Android and iOS devices to test real-world experience. We logged each action we took to create a written time-stamped record, in addition to making screen recordings and screenshots. This methodical approach created a baseline of understanding from which we could also assess any future changes made.

Once data was recorded it was assessed and RAG rated over 4 different areas:

- Targeted advertising,
- Accounts being private by default,
- Geolocation settings, and
- Age assurance measures.

In our first tranche of testing we undertook 92 separate tests. We used this work to focus engagement and regulatory action. We also created a comparison table which we've published providing information to the public on each platform.

We've subsequently developed this work in certain cases setting up multiple proxy accounts to understand what data is processed and shared when users interact with each other. We've also developed a framework to assess harmful material that we've observed through testing.

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

This work has added to the current understanding of what children are doing online and directly links that to where we can improve the landscape. This has provided us with real world experience which framed our understanding alongside other academic, regulatory, governmental and civil society sources.

Transparency has been a key driver of this work. Not only has it informed strategy and engagement, it's also been used to inform the public and push publicly for change. Through this work we've published high level findings and a comparison table.

We created a methodology for testing that is robust, replicable with a fast turnaround. We were able to manage this process with existing internal resources – something that other DPAs could do.

We have a much better understanding of what we hear from stakeholders as we've directly experienced it. This has allowed us to move at pace and be targeted in our work, focussing on areas of highest impact and allowed us to secure tangible changes across a range of areas (including targeted advertising, geolocation processing and default privacy settings). This also provides us with a better understanding of the impact of our work on real life experiences.

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)*

Service	a) Does the platform ask users to state their age when setting up an account (self declaration)?	b) Does the platform use any techniques to estimate or verify the age of the user during account setup?	c) Are adverts shown to children?	d) Is targeted advertising based on minimal information categories (age/location)?	e) Does the platform ensure that children's profiles are high privacy by default?	f) Is a child's geolocation hidden to other users by default?	g) Can children opt in to share their geolocation with other users?	Additional information (→)
BeFriend	Yes	No	Yes	N/A	No →	Yes	Yes	1
BeReal	Yes	No	Yes	N/A →	Yes	Yes →	Yes	2
Clubhouse	Yes	No	No	N/A	Yes	Yes	No	N/A
DailyMotion	Yes	No	Yes	Yes	Yes →	Yes	No	3
Discord	Yes	No →	Yes	No →	No →	Yes	No	4
Facebook	Yes	No	Yes	Yes	Yes	Yes	Yes	N/A
Frog	Yes	No	Unknown	Unknown →	No →	Yes	Yes	5
Hoop	Yes	No	No	N/A	No →	Yes	No	6
Imgur	No →	No	Yes	Yes	No	Yes	No	7
Instagram	Yes	No	Yes	Yes	Yes →	Yes	Yes	8
Odysee	Yes	No	No	N/A	Yes	Yes	No	N/A
Pinterest	Yes	No	No	N/A	Yes	Yes	No	N/A
Reddit	No →	No	Yes	Unclear →	No →	Yes	No	9
Sendit	Yes	No	No	N/A	Yes	Yes →	Yes →	10
Snapchat	Yes	No	Yes	Yes	Yes	Yes	Yes	N/A
Soda	Yes	Yes	Yes	Unclear →	Unclear →	Yes →	No	11

This image is of the comparative table summarising the key findings from the social media and video streaming app testing we conducted. The full table is available in the link below.

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*)

[Annex: Table of observations from our review of a sample of social media and video sharing platforms | 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*):

[Children's Code Strategy progress update - August 2024 | ICO](#)