

Q1 In terms of setting design standards for the processing of children's personal data by providers of ISS (online services), how appropriate you consider the above age brackets would be:

- Not at all appropriate
- Not really appropriate
- Quite appropriate**
- Very appropriate

Q1A Please provide any views or evidence you have on how appropriate you consider the above age brackets would be of setting design standards for the processing of children's personal data by providers of ISS (online services).

IoT interactive toys are marketed at below 3, respond to commands, maybe it should be 1-5.

Q2 Please provide any views or evidence about children's development needs in an online context for each, or any of the above age brackets.

age is not the only factor; mental age, disability etc needs to be accounted for

Q3 Please provide any views or evidence you have on how the Convention might apply in the context of setting design standards for the processing of children's personal data by providers of ISS (online services).

the process of child data that is purposely pretending to be an adult to gain services on xbox games eg Fornite

Q4 Please provide any views or evidence you have on what you think the Information Commissioner should take into account when explaining the meaning and coverage of these terms in the Code?

the ability to erase child's data pretending to be an adult with partially true content

Q5 Please provide any views or evidence you have on the following:

Q5A the opportunities and challenges you think might arise in setting design standards for the processing of children's personal data by providers of ISS (online services), in each or any of the above areas.

child especially teenagers know how to get access by pretending to be 18 or over

Q5B how the ICO, working with relevant stakeholders, might use the opportunities presented and positively address any challenges you have identified.

ICO needs to work icw health and social care child psychologists etc

Q5C what design standards might be appropriate (ie. where the bar should be set) in each or any of the above areas and for each or any of the proposed age brackets.

safeguarding standards for the most vulnerable groups regardless of age

Q5D examples of ISS design you consider to be good practice.

least privilege by default

Q5E additional areas (not included in the list above) which you think should be the subject of a design standard.

Q6 Name

[REDACTED]

Q6a Email

[REDACTED]

Q6b Brief summary of what you think you could offer

I am a DPO, a IT security specialist working for a Cyber Security company. [REDACTED]

[REDACTED]

Q7 Please provide any other views or evidence you have that you consider to be relevant to this call for evidence.

the liability should rest with the service providers, if fines were strict enough it would enforced correct behaviour and monitoring. Use of AI and machine learning could identified children pretending to be adults.

Q8 Are you (select one):

A body representing the views or interests of children?

A body representing the views or interests of parents?

A child development expert?

A provider of ISS likely to be accessed by children?

A trade association representing ISS providers?

An ICO employee

Other

Company ITSO, DPO, 