

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).

Would be better to use reading speed directly, not use age as a proxy for it

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.

Children read 100wpm at age 10. They will stop reading a privacy policy after 30 seconds. So 50 words max.

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).

They must be able to make informed consent within their attention span

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 GDPR states, "The principle of transparency requires that any information addressed to the public or to the data subject be concise"

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.

It's difficult to get the necessary information into 50 words (and only one click)

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

Set a max reading time of 30 seconds. Provide examples that can be read by a child in 30 seconds.

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.

It's not about age, but reading fluency. Slow readers have rights too. Set a max reading time of 30 seconds.

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

Literally none. Very many dreadful examples with 1000+ words and needing several clicks, including on the ICO site.

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

My degree is experimental psychology. I have worked 40+ years in games and UI design.

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

I have done a tiny survey of adults using current GDPR privacy policies. All but one are clicking through as fast as possible without reading or giving informed consent. Also we have 300+ clients and on average they are getting less than 1 GDPR request per 10 years.

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

Martech provider