Elizabeth Denham CBE
Information Commissioner
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

31 May 2019

Dear Elizabeth Denham,

We write to comment on the Age Appropriate Design Code published in draft by your office on April 15th 2019.

The undersigned are technology professionals, engineers and computer scientists. Many of us have been in this sector from the beginning and were part of its conception as an environment that would promote human flourishing, allow greater transparency, and greater distribution of knowledge and value.

We are not experts in children or childhood, but we are concerned that the digital environment should be one in which serves all humanity, and in doing that support the wellbeing and creativity of children. Our expertise is in what is possible to deliver technologically, so it is from that perspective that we write and make the following 3 points.

The fundamental principles of digital technology are in of themselves neutral – therefore when considering how systems work, one must first ask what the intended purpose of a system is. There is no inherent necessity to collect excessive amounts of personal data, nor to infer the intimate details of a child, to making a system work. Indeed a 'human' system would be one in which the need for data was balanced against the needs and intention of the user to benefit from interacting with that system.

The digital networks, when put to the cause of benefiting humanity, are very powerful tools. In particular, the value of connectivity for children would be to promote their curiosity and autonomy in order to become informed innovators or citizens of the future. We understand that the provisions of the Age Appropriate Design Code will support children in this regard.

Whilst of course one may always suggest that this regulatory code stretches existing technical capabilities, in fact it is both a duty, and a privilege to put technology to the cause of liberating and empowering the next generation. Digital technology will enable humanity to tackle some of the greatest issues of the day, climate change, poverty, education, inequality, disease; and upholding the rights and privileges of children is an important, but by no means the most technologically challenging, part of this mix. We would suggest that in fact much of the code simply requires the purpose of the system to be recalibrated, some of it requires more transparent methodologies, and only a small part requires technical innovation.

As a community of engineers and computer scientists we are convinced that there are no unsurmountable technological obstacles to achieve the goal of the Code, namely to foster a digital environment that respects the codified rights of the world's children.

We commend your office for introducing systemic data privacy and security on behalf of children, and hope that our support is material in the safe passage of your work.

Sincerely,

Jeffrey Aresty, Internet Bar
Fadi Bishara, Blackbox
Rei Chow, The Feast
David Kirkpatrick, Techonomy
Phil Komarny, Salesforce
Isfandiyar Shaheen, NetEquity Networks
John Taschek, Salesforce