

# Child Rights Impact Assessments in Relation to the Digital Environment

Summary of Findings on Current Trends and Industry Practices

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BSR is a nonprofit business network and consultancy focused on creating a world in which all people can thrive on a healthy planet. BSR has over 30 years' experience working with companies on just and sustainable business. The BSR team members contributing to this project work at the intersection of technology and human rights. All have expertise in child rights.

# 1. Executive Summary

The digital age has brought tremendous benefits to society, including for children. However, the spread of digital technologies also comes with a broad spectrum of risks to which children are particularly vulnerable.<sup>1</sup> To address these risks, companies developing or deploying digital technologies have a responsibility to conduct due diligence to identify and address the adverse human and child rights impacts with which they are involved. Child rights impact assessments (CRIAs) can support companies' due diligence efforts by using a methodology informed by the UN Guiding Principles on Business and Human Rights to identify and assess actual or potential impacts on children.

## About this Report

In 2023 UNICEF engaged BSR in an initiative to develop global guidance on conducting child rights impact assessments in relation to the digital environment. In the first phase of this initiative, BSR conducted a deep review of current industry practice in relation to child rights and human rights impact assessments to inform the design and scope of the new guidance, which will be published in 2025. Read more about UNICEF's work [here](#).

With the goal of sharing more granular insights on BSR's findings and contributing to the available knowledge base in this evolving field, this report supplements UNICEF's published findings brief, which was published in 2023. This report is a BSR publication and does not articulate nor represent any position of UNICEF.

1 The digital environment is comprised of digital technologies such as information and communications technologies, including digital networks, content, services and applications, connected devices and environments, virtual and augmented reality, artificial intelligence, robotics, automated systems, algorithms and data analytics, biometrics and implant technology. Source: Committee on the Rights of the Child, General comment No. 25 (2021) on children's rights in relation to the digital environment.

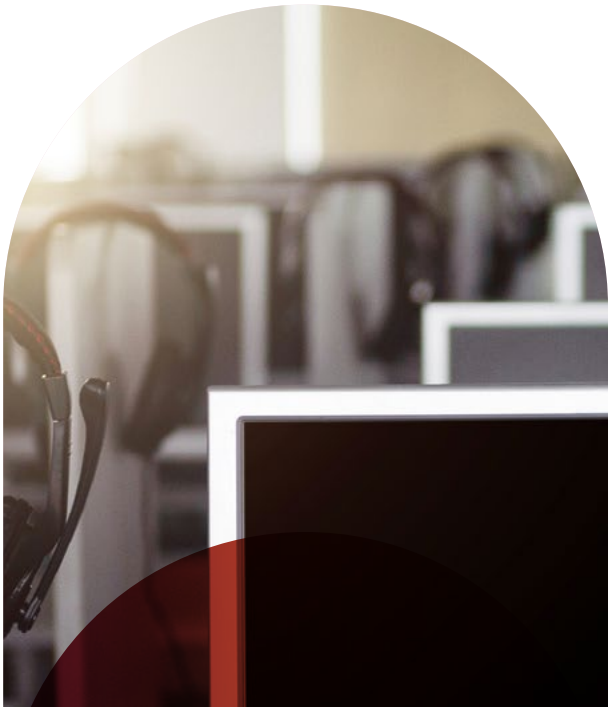
## Child Rights in Relation to the Digital Environment

Children are considered particularly vulnerable to violations of their human rights because of their developing physical and cognitive abilities, and factors such as socioeconomic class, degree of guidance and supervision required from parents and caregivers, level of education, and disability, among other factors. Research reveals that children face a wide range of potential adverse impacts from technology, including online sexual exploitation and abuse, discrimination, exposure to hateful content and violent images, privacy violations, and cyberbullying. These risks are often compounded for children in vulnerable situations, such as those experiencing poverty or mental health challenges, and exposure to one type of online harm increases the likelihood of encountering others.

The [UN General Comment No. 25 \(2021\)](#) on children's rights in relation to the digital environment and the Organization for Economic Cooperation and Development's (OECD's) [Revised Typology of Risks \(2021\)](#) provide important insight into how the [Convention on the Rights of the Child \(1989\)](#) applies in digital environments, and the different types of risk children can encounter and be impacted by online. While neither document provides a CRIA methodology, they can inform CRIs by offering a baseline understanding of the actual and potential impacts on children in the digital environment.

### CRIA Trends

Companies, policymakers, civil society, and other actors understand and assess risks to children in many ways. This includes assessing child rights impacts through human rights due diligence processes (including CRIs or human rights impact assessments), compliance programs, materiality assessments, product review cycles, and/or trust and safety processes. Undertaking CRIs helps companies fulfill their responsibilities under the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) to identify and address salient child rights issues when deploying new products, services, and features and/or as part of risk assessment processes increasingly required by regulations.



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To understand how companies are assessing impacts to children in practice, BSR reviewed four public and four confidential CRIAs on technology products or services. BSR also reviewed 15 published and 20 confidential HRIAs with a child rights and digital environment component. In addition, BSR interviewed 28 stakeholder groups whose work centers on or involves the digital environment and solicited feedback from approximately 100 stakeholders in two virtual roundtables. A complete account of findings is available in Section 5: Current Practice (below), and a summary of initial findings published by UNICEF is available [here](#).

## Key Insights on CRIAs

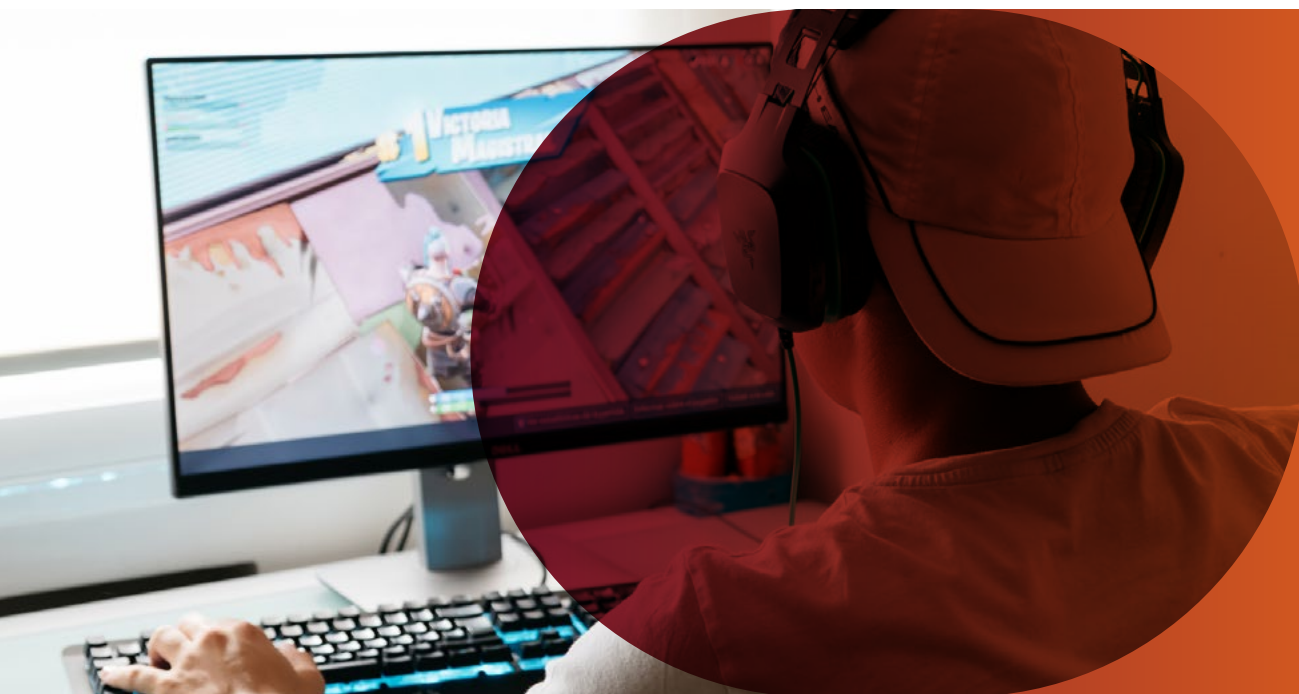
Key insights from the assessment review and stakeholder engagement include the following:

- Companies seek to understand their actual and potential impacts on children in the digital environment, but few use CRIAs to do so.
- The decision to undertake a CRIA can be activated by a range of factors, such as due diligence or risk assessment processes that identify child rights as a salient or material issue needing further review, shareholder resolutions, or external stakeholder pressure.
- Company approaches to assessing impacts on children tend to be safety-focused. This creates a risk that some actual and potential impacts on children are missed, and that children's right to participation is given insufficient attention. Few assessments include a comprehensive review with the full list of child rights as a reference point.
- Stakeholders from civil society, academia, and government feel that companies are doing too little on child rights and seek more visibility into assessments. However, reputational, confidentiality, and liability concerns hinder companies from sharing findings from CRIAs and similar assessments.
- New regulations are consuming resources within companies and constraining capacity. This makes it especially important to emphasize how CRIAs can support compliance efforts.
- Companies wish to engage with children to understand impacts, but many are unsure how to achieve this effectively and on a global scale. Of the CRIAs and HRIAs reviewed, consulting child rights experts was more common than directly engaging children.
- There is a lack of guidance on how to assess the impacts of new and emerging technology, how to reconcile rights that may be in tension with each other (e.g., freedom of expression and safety), and how to consider both risks and opportunities holistically.

## Evolving Regulatory Environment

A growing number of governments have established regulations requiring companies that provide online or digital services to consider risks to children. BSR evaluated the [Australian Online Safety Act](#), the [California Age-Appropriate Design Code Act](#), the [EU Corporate Sustainability Reporting Directive](#), the [EU Digital Services Act](#), the [UK Age-Appropriate Design Code](#), and the [UK Online Safety Act](#), and considered how these new regulations may influence company approaches to assessing impacts on children. We make the following observations:

- The risk assessment methodologies required by regulations typically expect companies to conduct stakeholder engagement and consider the severity of risks to children rather than risk to the business. This will increase the breadth of companies considering risks to children.
- Regulations consistently incorporate considerations of child rights; however, some regulations are limited to specific rights, such as online safety or privacy, and may only require limited assessments. This is not consistent with the expectation that CRIs assess impacts on all the rights that children have, not only a subset of rights.
- Companies may begin to consolidate human rights, child rights, and compliance processes in a single centralized assessment process that covers all mandatory and voluntary risk assessments.



## UNICEF's Response

UNICEF will develop a three-part toolkit to meet the needs identified through stakeholder engagement and analysis of existing child rights assessments and tools. This will include:



a child rights introduction/101 slide deck explaining what CRIAs are and why to conduct them;



a tool/spreadsheet to facilitate evidence collection and thorough analysis during a CRIA that is aligned with human rights and child rights assessment best practice; and



a guidance document providing detailed information about why CRIAs are valuable and how to implement the tool.

Built-for-purpose guidance for conducting CRIAs in the digital environment will help companies consider child rights in a systematic way and help ensure that *children's rights are protected, respected, and promoted.*

The new tool will be launched in early 2025, followed by trainings target audiences on implementation.

This project comes at a time when there is clear evidence of technology's powerful impact on children, but when child rights assessment, mitigation, and communication practices are ad hoc rather than strategic. Built-for-purpose guidance for conducting CRIAs in the digital environment will help companies consider child rights in a systematic way and help ensure that children's rights are protected, respected, and promoted.

# 2. Project Overview

## 2.1 Introduction

The age of digital technology and the internet has brought tremendous benefits to society, including for children. Digital access provides opportunities for learning, communication, play, and social interaction, creating significant potential for the realization of children’s rights. However, the spread of digital technologies also comes with a broad spectrum of risks to which children are particularly vulnerable.

The majority of children have access to the internet and use it frequently, even if they don’t have an internet connection at home. A global study by the Boston Consulting Group (BCG) found that 93% of children use the internet daily by the age of 12.<sup>2</sup> Children and teenagers interact with technology for various reasons, including education, play and leisure, access to essential services, and socialization with friends and family. Although use and access patterns differ by region, the increasing connectivity of households globally, the surge in educational use of technology prompted by the COVID-19 pandemic, and the popularity of social media platforms have embedded the digital environment into children’s daily lives.<sup>3</sup>

Children may be impacted as users of technology products or services and as non-users as a result of the development, deployment, and use of digital technologies in the world around them. For example, in 2022, 72% of children using the internet reported experiencing at least one “cyber threat” such as bullying or harassment, unwanted ads, or inappropriate images or content.<sup>4</sup> In 2023, the indirect privacy risks of ambient computing were publicized with the news of Amazon’s \$25 million settlement with the US Department of Justice and the Federal Trade Commission over Amazon’s practice of retaining voice recordings of children collected by the Alexa smart home devices, without deleting the data as parents expected.<sup>5</sup>

Despite the increased use of technology products and services by children in recent years, understanding the full scope of impacts that may arise can

93%

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2 BCG, [Why Children Are Unsafe in Cyberspace](#), 21 September 2022.  
3 Gallup, [Teens Spend Average of 4.8 Hours on Social Media Per Day](#), 13 October 2023.  
4 BCG, [Why Children Are Unsafe in Cyberspace](#), 21 September 2022.  
5 <https://www.justice.gov/opa/pr/amazon-agrees-injunctive-relief-and-25-million-civil-penalty-alleged-violations-childrens>.





To meet their responsibilities to respect children’s rights, companies should have in place policies and processes appropriate to the nature of their business.

be challenging for several reasons, including: (1) the rapid pace of technological advancements and changes in how technologies are used; (2) regulatory protections on what user data can be collected by companies; (3) lack of transparency from companies; and (4) the fact that impacts to children may vary based on individual and environmental factors, such as age, socioeconomic status, gender, and family situation.

Children can be associated with harms in different ways. They can be victims, targets, participants, and initiators of risky or harmful online behavior.<sup>6</sup> The nuanced roles children have in the digital environment and the challenges of age-assurance mechanisms contribute to a lack of verified information about the cumulative impacts of technology products and services on children.<sup>7</sup> Accordingly, it is harder to identify impacts and create effective mitigations. However, the likelihood of these harms occurring decreases when children engage with products and platforms specifically designed for them, or which robustly incorporate children’s rights considerations.

The UNPGs and the Children’s Rights and Business Principles (CRBPs) note that the impacts that companies have on children may be severe and long lasting, and are more likely to be irreversible due to their level of physical and psychological development. As such, companies have a responsibility to respect and support children’s rights by “avoiding the infringement” of rights and “addressing adverse impacts” with which they are involved.

To meet their responsibilities to respect children’s rights, companies should have in place policies and processes appropriate to the nature of their business, including a policy commitment to meet their responsibility to respect child rights; a child rights due diligence process to identify, prevent, mitigate, and account for how they address their impacts on human rights; and processes to enable the remediation of any adverse child rights impacts

6 Thorn, Responding to Online Threats: Minors’ Perspectives on Disclosing, Reporting, and Blocking, May 2021

7 Digital Trust & Safety Partnership, Age Assurance—Guiding Principles and Best Practices, September 2023..

they cause or to which they contribute.<sup>8</sup> These policies and processes are typically for human rights broadly, of which child’s rights are a part.

UNICEF and child rights experts have developed resources to help companies assess and integrate child rights considerations into their business operations and activities. Child rights impact assessments can support a comprehensive and targeted human rights due diligence (HRDD) process by identifying and assessing actual or potential impacts on children.

Although HRDD has been primarily voluntary in the past, recently passed regulations such as the [EU Digital Services Act](#) and the [UK Online Safety Act](#) now require companies to conduct risk assessments to identify and assess the risks to people. While these regulations do not require child rights impact assessments, they do require companies (including online platforms and digital service providers) to consider specific children’s rights and/or risks to children, such as the right to health or risks to children arising from exposure to harmful online content. This creates an opportunity to formalize how child rights issues are considered within companies’ broader HRDD and risk assessment processes.

The evolving regulatory environment also emphasizes the need for robust methodologies, guidance, resources and/or tools for carrying out CRIAs that are aligned with policy developments and synergistic with companies’ broader risk assessment processes.

To date, few CRIAs have been made public, and there is limited guidance on how to effectively assess child rights impacts in a digital environment. This paper seeks to provide a comprehensive overview of the landscape of CRIAs in the digital environment by exploring (1) available CRIA tools and guidance, (2) current industry CRIA practices and challenges highlighted by stakeholders, and (3) the evolving regulatory environment.

## 2.2 Methodology

This paper focuses on BSR’s CRIA research activities and findings, which included:

- **Review of existing child rights resources:** BSR compiled and reviewed over [150 resources](#), including broad context-setting documents, targeted guidance on assessing impacts to one or more child rights, and tools designed to inform the assessment of child rights impacts. BSR considered a resource relevant if it addressed issues impacting children in the digital environment or provided guidance on how to assess child rights. Resources were included if they were available in English; published in a digital format; authored by credentialed

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<sup>8</sup> OHCHR, [UN Guiding Principles on Business and Human Rights](#), Principle 15, June 2011.

researchers, governmental agencies, organizations, or companies; and/or shared with us by a stakeholder interviewee or by UNICEF.<sup>9</sup> Priority was given to resources published within the past 10 years because older resources did not capture the realities of the digital environment that are central to this project.

- **Review of current child rights impact assessment practices:** BSR reviewed four public and four nonpublic CRIAs on technology products or services and evaluated the strengths, weaknesses, and gaps in existing child rights assessment practices.<sup>10</sup> One public CRIA included the full assessment, while other CRIA publications were summaries of the assessments undertaken. BSR also reviewed 15 published and 20 confidential human rights assessments (HRAs) and human rights impact assessments (HRIAs) conducted by companies. The HRIA process is typically more involved than an HRA because an impact assessment requires engagement with external stakeholders and affected rightsholders, whereas an HRA can be conducted solely through internal consultations and desk research. This review considered how child rights issues and methodologies were incorporated into broader human rights work and identified industry trends in impact and risk assessment processes.
- **Assessment of child rights considerations in new regulations:** BSR reviewed new regulations that require technology companies to assess the risks their services pose to a variety of human rights. This assessment revealed how new regulations incorporate child rights considerations and identified opportunities for leverage or synergy with new CRIA guidance.

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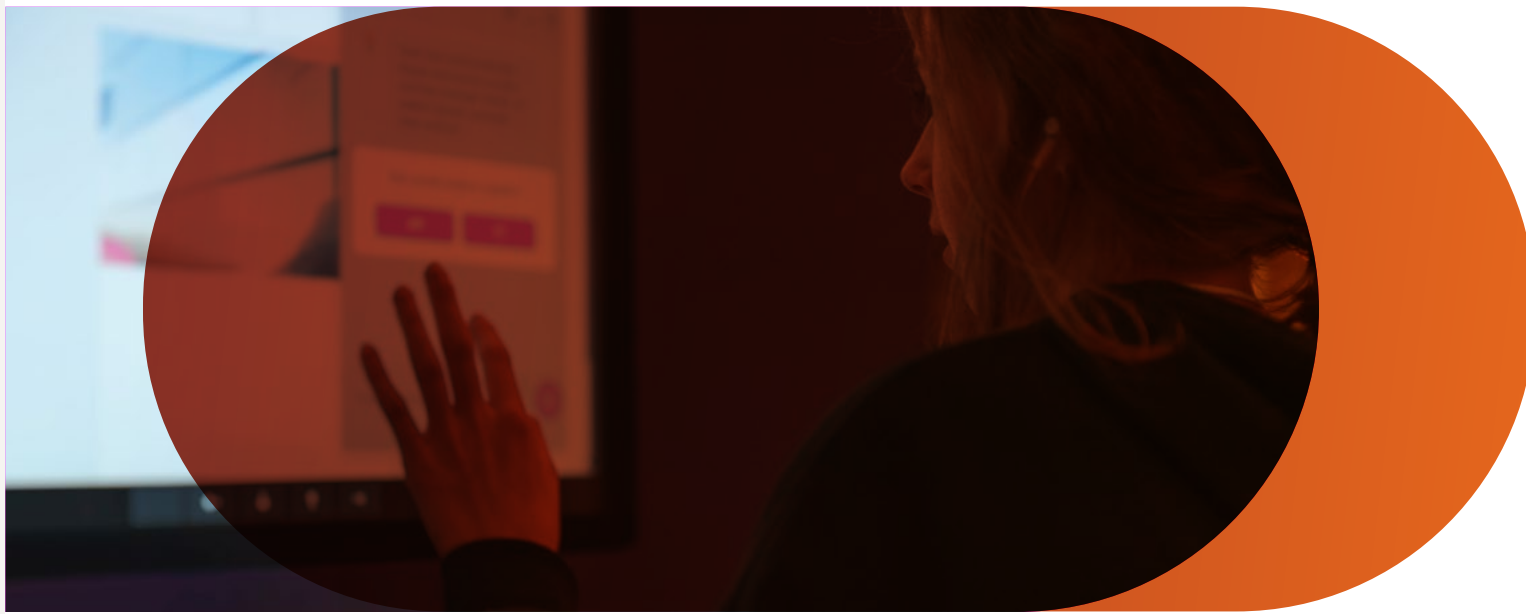
public and four nonpublic CRIAs were reviewed by BSR for this report.

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published and 20 confidential human rights assessments (HRAs) were reviewed by BSR for this report.

<sup>9</sup> Resources were limited to English language given project team's language constraints.

<sup>10</sup> BSR reviewed CRIAs conducted for technology companies, and CRIAs conducted for non-technology companies that address the digital environment. The CRIAs reviewed were conducted between 2020 and 2023.



- **Stakeholder engagement:** In addition to desk research, BSR and UNICEF engaged approximately 130 stakeholders via virtual interviews and roundtable discussions. Twenty-five interviews were conducted with 28 different stakeholders, who had one or two representatives present on each call to share insights into the entity’s child rights work. Approximately approximately 100 stakeholders joined the two virtual roundtables. Across interviews and the virtual roundtables stakeholder representation was diverse, including academics, policymakers, investors, and representatives from consulting companies, international organizations, civil society organizations from Europe, Asia, and Latin America, and companies headquartered in Europe, Africa, Asia, and North America.

The assertions in this paper are informed by both the methodology described above and BSR’s 20 years of experience working at the intersection of technology and human rights. BSR has undertaken over 120 human rights assessments with technology companies, a minority of which have been published (e.g., HRIAs of the [Twitch](#) platform and the [Global Internet Forum to Counter Terrorism](#)). BSR also has a growing portfolio of child rights work with technology companies (e.g., a recently completed CRIA for one of the world’s five largest technology companies), HRIAs with a significant child rights element (e.g., Meta’s [HRIA of end-to-end encryption](#)), and partnerships with child safety focused collaborations (e.g., an HRIA for the Tech Coalition’s [Lantern program](#)). BSR also has extensive experience assessing child rights in other industries (e.g., palm oil companies in Malaysia and Indonesia).

# 3. Identifying and Assessing Impacts on Children

## 3.1 History of Assessing Child Rights

Children are entitled to all human rights contained in the international human rights framework and rights that specifically address the unique conditions of childhood, such as developing mental capacities and relying on adults for their livelihood. The 1959 Declaration of the Rights of the Child set out for the first time children’s rights to protection, education, healthcare, shelter, and good nutrition, and spread awareness that child rights should be considered as connected to—but distinct from—human rights. Thirty years later, in 1989, the UN General Assembly adopted the Convention on the Rights of the Child (CRC), which became the foundation for child rights considerations.



In 1989, the UN General Assembly adopted the **Convention on the Rights of the Child (CRC)**, which became the foundation for child rights considerations.

The CRC is the foundational international framework for protecting and promoting rights and fundamental freedoms of all persons under 18. It incorporates the full range of human rights—including civil, cultural, economic, political, and social rights—and declares the best interests of the child to be a primary consideration. It also highlights children’s dependence on family and their evolving capacities, and establishes childhood as a unique period in human development that warrants special protections. As with other human rights instruments, the CRC is addressed to, and designed for, state parties.

The CRC established a Committee on the Rights of the Child to monitor state parties’ implementation of the CRC and its optional protocols.<sup>12</sup> As parties to the Convention, states commit to submitting comprehensive reports that provide updates on the implementation of the CRC in their countries, including the steps they have taken and progress in the enjoyment of children’s rights.<sup>13</sup> In 1992, the Committee noted the importance of developing appropriate indicators that enabled an assessment of how the rights granted by the CRC were guaranteed and implemented by state parties.<sup>14</sup>

The term “Child Rights Impact Assessment” came into use in 2003 after the publication of CRC General Comment No. 5, which stated that “Ensuring that the best interests of the child are a primary consideration in all actions concerning children [...] demands a continuous process of child impact assessment (predicting the impact of any proposed law, policy, or budgetary allocation which affects children and the enjoyment of their rights) and child impact evaluation (evaluating the actual impact of implementation).”<sup>15</sup>

The unanimous endorsement of the UNGPs by the UN Human Rights Council in 2011 established consensus on companies’ responsibility to respect human rights and child rights, thereby making it clear that the concept of child rights impact assessments is relevant for companies, not just states.<sup>16</sup> Now considered the global authoritative standard on business and human rights, the UNGPs provide the first internationally agreed upon framework that lays out the responsibility companies have to avoid infringing on the human rights of others and to address adverse human rights impacts with which they are involved.<sup>17</sup>

Principle 17 of the UNGPs states that “To identify, prevent, mitigate, and account for their actual and potential adverse human rights impacts, business enterprises should carry out human rights due diligence.”<sup>18</sup> The HRDD process involves assessing actual and potential adverse human rights impacts, integrating, and acting on the findings, tracking responses, and communicating how impacts are addressed (see Figure 1 below). Companies are also expected to have in place remediation processes to address adverse human rights impacts that they have “caused” or “contributed to.”<sup>19</sup>

12 OHCHR, Introduction to the Committee.

13 UNICEF, Article 44, CRC, 1990.

14 OHCHR, Report on the Second Session of the Committee on the Rights of the Child, 1992.

15 Committee on the Rights of the Child, General Comment No. 5 (2003) on General measures of implementation of the Convention on the Rights of the Child, 27 November 2003, para. 6.

16 UNDP India, UNGP Brochure, 27 December 2021.

17 UNDP India, UNGP Brochure, 27 December 2021.

18 OHCHR, UN Guiding Principles on Business and Human Rights, Principle 17, June 2011.

19 Due diligence methodology considers the appropriate action for a company to address adverse human rights impacts using factors contained in Principle 19 of the UNGPs: Attribution/Scope of responsibility—e.g., How closely would the company be connected to the human rights impact? The following UNGP definitions apply: “Caused the impact” means the company should take the necessary steps to cease or prevent the impact. “Contributed to the impact” means the company should take the necessary steps to cease or prevent its contribution and use its leverage to mitigate any remaining impact to the greatest extent possible.

HRDD is an ongoing process and should not be confused with a human rights assessment, which is just one step of a broader HRDD and informs the other phases. HRDD can be undertaken at various scopes, such as company, product, feature, market, or country, and may take different forms, including the integration of human rights into other processes, such as adversarial testing and “red teaming.”<sup>20</sup>

**Figure 1: The Human Rights Due Diligence Process.<sup>21</sup>**

A human rights assessment is one part of a broader system of ongoing human rights due diligence.



The UNGPs call for particular attention be paid to the rights and needs of, as well as the challenges faced by, individuals from groups or populations that may be at heightened risk of becoming vulnerable or marginalized (General Principles), and specifically call out children as a group that requires specific attention (Principle 12). However, the UNGPs do not describe what this means in practice, and they do not provide details on how the specific needs of children should be addressed by companies.

<sup>20</sup> Red teaming is an exercise conducted as a simulated adversarial attempt to compromise organizational missions and/or business safeguards in order to assess the security risks, vulnerabilities, and abuse vectors of the product, platform, service, or organizational system.

<sup>21</sup> BSR, Human Rights Assessments: Identifying Risks, Informing Strategy, 2021.

To clarify the position of children as rightsholders under the UNGPs, UNICEF, Save the Children, and the UN Global Compact published the Child Rights Business Principles (CRBPs) in 2012. Intended for companies across all sectors, the CRBPs comprise 10 principles for companies to adhere to in their efforts to respect children’s rights and address their impacts on those rights.

The CRBPs broadened the understanding of business impacts on children beyond child labor to also consider the ways companies can affect children’s rights through operations, products, services, marketing practices, and relationships with governments and local communities.<sup>22</sup> The CRBPs also went a step beyond the UNGPs by setting out a “corporate commitment” to support, as well as a “responsibility to respect,” child rights. The CRBPs clarify that while respect for children’s rights is the minimum required of business, actions to support children’s rights are strongly encouraged.

The CRBPs’ four-step process of 1) identify and assess, 2) integrate, 3) monitor and track, and 4) communicate aligns with the HRDD process depicted in Figure 1. These principles provide a child rights “lens” to the UNGPs and are central to CRIA methodology.

### 3.2 The Unique Considerations for Children

The digital environment brings tremendous benefits for children. Digital access provides vital opportunities for learning, communication, and social interaction and can be hugely formative for a child’s cognitive and social development. The value of the digital environment for children was made especially clear during the COVID-19 pandemic, when technology and digital platforms helped children access education, stay in touch with their friends, enjoy a social life despite restrictions on physical group gatherings, access mental health support, and find information about the world events unfolding around them.<sup>23</sup>

22 Concerns and discussions about the impact of business on child rights originated with the issue of child labor. Business activities were scrutinized to identify children working illicitly, directly or indirectly, in supply chains, as well as connections to adverse impacts to children resulting from human trafficking and migrant labor dynamics, and these efforts continue today. UNICEF, et al. [Child Rights Business Principles, 2012.](#)

23 Terre des hommes, [#CovidUnder19, 2021.](#)

“Children are among the most marginalized and vulnerable members of society and can be disproportionately, severely, and permanently impacted by business activities, operations, and relationships.”

— **Professor John Ruggie**, former special representative of the secretary-general on human rights and transnational corporations and other business enterprises





However, the spread of digital technologies also comes with a broad spectrum of risks to which children are particularly vulnerable. Children are considered specifically vulnerable to violations of their human rights because of their developing physical and cognitive abilities and factors such as socio-economic class, degree of guidance and supervision required from parents and caregivers, level of education, and disability, among others.

Tensions can arise when seeking to both protect children from harm and respect a child’s right to participate in and benefit from the digital environment. Deliberate effort is needed to ensure that both priorities are achieved at the same time and that a child’s rights are fully protected, respected, and realized online.

The OECD defines child vulnerability as “the outcome of the interaction of a range of individual and environmental factors that compound dynamically over time.”<sup>24</sup> Children’s individual and environmental vulnerability may be compounded by business activities.

As technology becomes increasingly pervasive and more accessible to children, the digital environment creates new ways in which children are vulnerable to harm. The following data points help showcase why particular attention must be paid to child rights in the digital environment:

- The 2022 Disrupting Harm research by ECPAT International, Interpol, and the UNICEF Office of Research Innocenti found that 9–20% of children in two-thirds of the 12 African and Asian countries surveyed reported experiencing at least one instance of clear online sexual exploitation and abuse within the year prior. When scaled to population size, estimates suggest that “tens of thousands, or even millions, of children in each country are being subjected to severe instances of online sexual abuse each year.”<sup>25</sup>
- A 2021 study by Internet Matters found that children are up to seven times more vulnerable to online harms if they experience any of the following: poverty; family and social care burdens; mental and physical disabilities; psychological challenges (such as depression, eating disorder, etc.); chronic physical illness; social isolation; or lack of digital literacy.<sup>26</sup>
- A 2023 study by Sonia Livingstone and other academics commissioned by NSPCC Learning found that children’s vulnerability often worsens in periods of political, environmental, or public health crises. For instance, children who spent more time online during the COVID-19 pandemic were exposed to more misinformation and child sexual abuse material.<sup>27</sup>
- A 2023 report by UNICEF Innocenti found that children’s exposure to hateful content and messages online is linked to exposure to violent images across diverse countries.<sup>28</sup>

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more vulnerable to online harms if [children] experience **any** of the following:

- » poverty
- » family and social care burdens
- » mental and physical disabilities
- » psychological challenges
- » chronic physical illness
- » social isolation
- » lack of digital literacy

24 OECD, [What is child vulnerability and how can it be overcome?](#) 2019.

25 UNICEF Office of Research—Innocenti, [Children’s Experiences of Online Sexual Exploitation and Abuse in 12 Countries in Eastern and Southern Africa and Southeast Asia. Disrupting Harm Data Insight 1, 2022.](#)

26 Internet Matters, [Refuge and Risk—Life Online for Vulnerable Young People, 2021.](#)

27 NSPCC Learning, [Evidence Review on Online Risks to Children, November 2023.](#)

28 UNICEF Innocenti, [Children’s exposure to hate messages and violent images online, 2023.](#)



- A 2021 report by the Center for Democracy and Technology (CDT) found that low-income children using school-issued technology were subject to more activity monitoring by teachers and administrators than wealthier students who used personal devices that the school did not have access to. As such, they experienced more adverse privacy impacts than their wealthier peers because school-issued devices for learning became a surveillance mechanism that more affluent students were not subject to.<sup>29</sup>
- A 2023 report by the Electronic Frontier Foundation found that business’ use of children’s data for online advertising violates children’s privacy, promotes predatory or exploitative ads, and entrenches discrimination based on gender, age, and race profiling.<sup>30</sup>
- The EU Kids Online 2020 Survey found that exposure to one type of harm online increases the likelihood of exposure to a different kind of harm. For example, a child who sees hate speech content is more likely to see other types of harmful content, like violent imagery.<sup>31</sup>
- Children who experience harms are more likely to become perpetrators of harms themselves, a phenomenon sometimes called the “victim-bully overlap.”<sup>32</sup> For example, researchers at Japan’s Tokushima University found that youth who experienced cyberbullying were more likely to become cyberbullies themselves.<sup>33</sup>
- In 2022, Global Kids Online published findings that technology can also enable or exacerbate children’s vulnerabilities outside the digital environment. Research showed that most children who experience sexual exploitation and abuse online also experience sexual violence in person, and that online coercion often results in harmful offline interactions.<sup>34</sup>

29 [CDT, Online and Observed—Student Privacy Implications of School-Issued Devices and Student Activity Monitoring Software](#), September 2021.

30 [Electronic Frontier Foundation, Privacy First: A Better Way to Address Online Harms](#), 14 November 2023.

31 [Smahel, D. et al, EU Kids Online 2020: Survey results from 19 countries](#), 2020.

32 [Voisin et al., Bullying victimization and perpetration: some answers and more questions](#), July-August 2023.

33 [Yokotani, et al., Social contagion of cyberbullying via online perpetrator and victim networks](#), 2021.

34 [Global Kids Online, Online sexual exploitation and abuse: new findings](#), 1 June 2022.

## 3.3 Key Guidance for Assessing Child Rights

We found that companies, policymakers, civil society, and other actors understand and assess risks to children in many ways. This includes assessing child rights impacts through human rights due diligence processes (including CRIAs or HRIAs), compliance programs, materiality assessments,<sup>35</sup> product review cycles, and/or trust and safety processes.<sup>36</sup> These approaches are not all based on human rights or child rights frameworks, and may not include a comprehensive review against the full list of child rights. However, they do support the identification and assessment of specific risks to children, including risks related to forced labor, safety, emotional health and well-being, privacy, freedom of expression, and access to information.

The following subsections summarize key context-setting resources and child rights guidance that were consistently referenced in interviews, the roundtables, and project team meetings with UNICEF. These subsections are not offered as a comprehensive list of all relevant resources, but to demonstrate the contrast between (1) the breadth of available resources that provide context and information on child rights and (2) the far fewer resources that detail how to conduct a child rights impact assessment, especially in the digital environment. Tools designed specifically for the assessment of impacts on child rights are discussed and analyzed in [Section 4](#).

### 3.3.1 Context-Setting Resources

Context-setting resources provide background on the impacts on children in the digital environment. Those most frequently referenced in stakeholder interviews and cited in publications exploring children and technology include:

- **General Comment No. 25**, CRC 2021—Intended for states but frequently referenced by companies, civil society, and academia, General Comment No. 25 (GC25) provides essential context for why children’s rights must be considered distinct from human rights and how the CRC applies in digital environments. It affirms the need for companies to consider impacts to direct users of their technology, as well as to children who are nonusers and adult caregivers or educators whose technology use impacts children. GC25 provides significant detail about the specific harms that might occur given different product and business models. While GC25 does not provide a CRIA methodology, it establishes a baseline understanding of the actual and likely impacts on children in the digital environment from which CRIAs should be conducted and offers a rationale for why particular child rights must be respected and protected in the digital environment.

35 A materiality assessment is a process used to identify and disclose the most important environmental, social, and governance (ESG) issues affecting an organization’s operations and services. Learn more at <https://www.bsr.org/en/prs/materiality-and-salience>.

36 Trust and safety is an umbrella term for the teams and functions within companies that are devoted to protecting product and platform users from harmful and unwanted experience. Most commonly, they work on issues of platform policy enforcement and content moderation. Learn more at [Trust and Safety Professional Association](#).

- Recommendation of the Council on Children in the Digital Environment**, OECD, 2021—The recommendation aims to help governments understand the digital landscape so they can develop “coherent policies and procedures [that] address the delicate trade-off between enabling the opportunities that the digital environment can bring to children and protecting them from the risks.” The recommendation recognizes the best interests of the child as a fundamental value and promotes proportionate measures that are respectful of rights, foster the empowerment and resilience of children, and encourage multi-stakeholder cooperation.
- Children in the Digital Environment: Revised Typology of Risks**, OECD, 2021—Intended for all categories of stakeholders, this typology is a companion to the Recommendation on Children in the Digital Environment. It is founded upon a “4C risk framework” of four risk categories (content risks, conduct risks, contact risks, and consumer risks), and includes several risks that cut across these four categories (privacy risks, advanced technology risks, and health and well-being risks). In addition, four “risk manifestations” prompt stakeholders to consider various types of risks that a given technology platform or service creates at the different stages of its life cycle.

**Risk for Children in the Digital Environment**

Risk Categories	Content Risks	Conduct Risks	Contact Risks	Consumer Risks	
Cross-cutting Risks*	Privacy Risks (Interpersonal, Institutional, and Commercial)				
	Advanced Technology Risks (e.g., AI, IoT, Predictive Analytics, Biometrics)				
	Risks to Health and Well-being				
Risk Manifestations	Hateful Content	Hateful Behavior	Hateful Encounters		Marketing Risks
	Hateful Content	Hateful Behavior	Hateful Encounters		Commercial Risks   Profiling Risks
	Illegal Content	Illegal Behavior	Illegal Encounters		Financial Risks
	Disinformation	User-generated Problematic Behavior	Other Encounters	Problematic	Security Risks

\*Note: The typology acknowledges risks that cut across all risk categories (“cross-cutting risks”). These risks are considered highly problematic as they may significantly affect children’s lives in multiple ways.

Source: OECD and Berkman Klein Center for Internet and Society at Harvard University.

There are many valuable resources for understanding the child sexual abuse and exploitation risks faced by children, especially from Global Kids Online and the Tech Coalition. A more comprehensive account of the resources is available in Appendix B: Resource Directory.

### 3.3.2 Guidance for Assessing Child Rights

There are many resources that provide guidance on how to use rights-based framing to assess impacts on children, including both child rights broadly and child rights in the digital environment.

Desk research and interviews most frequently referred to UNICEF resources, noting that UNICEF has led the field in creating actionable guidance for understanding child rights and helping a broad range of diverse stakeholders align their approaches with the UNGPs and CRBPs. That guidance includes the following:

- [Child Rights and Business Principles](#) (2012)
- [Children’s Rights in Impact Assessments](#) (2013)
- [Children’s Rights in Policies and Codes of Conduct](#) (2013)
- [Children’s Rights in Sustainability Reporting](#) (2014)
- [Children Are Everyone’s Business Workbook 2.0](#) (2014)
- [Engaging Stakeholders on Children’s Rights: A Tool for Companies](#) (2014)

UNICEF publications with particular applicability to the assessment of child rights in the digital environment include the following:

- [Guidelines for Industry on Child Online Protection \(UNICEF and ITU\)](#) (2015)
- [COSA: Child Online Safety Assessment Tool](#) (2016)
- [Child Safeguarding Toolkit for Business](#) (2018)
- [Children and Digital Marketing Toolkit](#) (2018)
- [Online Gaming and Children’s Rights: Assessing Impact on Children](#) (2020)
- [Policy Guide on Child and Digital Connectivity](#) (2018)
- [Guidelines for Industry on Child Online Protection](#) (2020)
- [Policy Guidance on AI for Children](#) (2021)
- [Responsible Innovation in Technology for Children \(RITEC\)](#) (2022)

The 2015 Industry Guidelines for Child Online Protection (COP) and 2016 Child Online Safety Assessment tool (COSA) contributed to a new era of guidance focused on child rights in the digital environment.<sup>37</sup>

Since then, industry groups, policymakers, academia, and civil society have published many resources that contextualize child rights in the digital environment. Guidance either focuses on specific rights (such as rights to

37 The COP guidelines for ICT and online industries provides guidance for identifying, preventing, and mitigating adverse impacts on children’s rights, and guidance on how to promote children’s rights and digital citizenship. The COSA tool helps ICT companies assess how child rights like safety, privacy, and freedom from exploitation are integrated into their operations and due diligence processes.

privacy, safety, or accessibility) or a range of relevant rights taken together. The “range of rights” approach is most common in design guides intended for product developers, with information about a variety of children’s rights (e.g., right to play, access to information) presented along with best practices for respecting these rights in the design, development, and deployment of technology. The guidance most frequently referenced in interviews is summarized below, with a complete list of resources available

38 The 11 Child Rights by Design Principles are Equity and Diversity, Best Interests, Consultation, Age Appropriate, Responsible, Participation, Privacy, Safety, Well-Being, Development, and Agency.



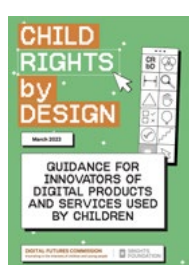
Guidelines for Industry on Child Online Protection, ITU and UNICEF (2020)—This update to the 2015 guidelines supports technology companies with efforts to improve child online safety and the realization of their rights. It focuses on protecting and promoting children’s rights through corporate policies; grievance mechanisms; Child Sexual Abuse Material (CSAM) handling processes; age-appropriate design; technology literacy; and use of technology to increase civic engagement. The guidelines do not provide a step-by-step process for assessing impacts to child rights but do provide checklists customized for different types of technology industry actors. These checklists provide helpful guidance for companies with less internal knowledge of child safety best practices and minimum expectations.



Children’s Code Design Guidance, ICO (2022)—The Children’s code establishes how technology platforms and services should be designed to protect children’s online safety and privacy, consider children’s perspectives, and attend to the different needs of children according to age group (e.g., give children under 10 years old more protective features, and give children 10-17 years old more agency). We analyze the Children’s Code Self-Assessment tool in Section 4.



Designing for Children’s Rights Guide, D4CR (2022)—This design guide is popular among designers and product teams within technology companies for its ease of use. The guide provides 10 principles that map to CRC articles (e.g., Principle 9: “Help children recognize and understand commercial activities” references a child’s right to information) and is available in web, slide deck, and document format.



Child Rights by Design, Digital Futures Commission (2023)—This guidance maps out 11 principles that companies in the digital environment should adhere to when designing products and services.<sup>38</sup> It encourages industry to design with child rights in mind as a matter of avoiding reputational risk and societal harm. The 11 principles were derived from the CRC and General Comment No. 25, and expand upon the Dutch Code for Children’s Rights and the Australian eSafety Commissioner’s Safety by Design Principles and Toolkit. Companies that adhere to the principles when designing their services and platforms are more likely to be following best practice to minimize adverse impacts on child rights.

### 3.3.3 Guidance for Conducting Child Rights Impact Assessments (CRIAs)

There is limited guidance on how to conduct CRIAs. Further, the CRIA guidance that does exist differs significantly based on the intended scope of the CRIA (e.g., public policy, company operations, or specific product), the intended user of the guidance (e.g., government or private company), and other differentiating factors (e.g., industry, context). Guidance that was most frequently cited in research and interviews includes the following:

- **[Child Rights in Impact Assessments](#)**, UNICEF and DIHR (2013)—Intended for companies, this industry-agnostic guidance explains how business activities connect to children’s rights. It uses the 10 CRBPs to create 58 aligned “criteria” questions for companies to respond to, then suggests actions companies can take with respect to each criterion (e.g., consult experts, update policies and procedures with child-specific guidance, require all suppliers to adopt child rights commitments, introduce ongoing incident monitoring, etc.). At the time of release, this guidance provided important structure for assessing child rights in business activities when there was none. However, it was created over ten years ago and is not specifically targeted toward the digital environment.
- **[Integrating Child Rights in Development Cooperation \(Module 5\)](#)**, UNICEF and European Union, 2014—Intended for governments and international development organizations, Module 5 provides a CRIA methodology, suggests ways to make impact assessments part of program management, and offers example scenarios that demonstrate how a policy or program change can impact child rights. The seven step CRIA methodology presented is based upon the EU’s 2009 [Impact Assessment Guidelines](#), which are intended for government. The format of this guidance is approachable and reasonable given the intended user audience, but it is too general to be adapted for business use.
- **[MO-CRIA: Child Rights Impact Self-Assessment Tool for Mobile Operators](#)**, UNICEF, 2014/2021—Developed specifically for mobile operations, this CRIA resource has three components: a deck, a self-assessment tool, and a guidance document that provides an overview of the process and offers case studies from mobile operators whose business operations benefited from conducting a CRIA. The self-assessment tool is organized according to seven assessment areas that map to company departments. Workbook tabs prompt assessors to respond to a series of yes/no statements and provide substantiating evidence for the responses selected. Upon completion of the

assessment, assessors can see a visual representation or “heatmap” of issues across all assessment areas and can see an aggregate view of the data provided. Stakeholder interviews revealed that this tool encouraged telecommunications companies to undertake CRIs when it was still a nascent practice for companies. However, the tool focuses on internal processes and lacks prompts that would help assessors consider the broader impacts on children that they may have throughout the value chain. The focus on telecommunications also limits the applicability of the tool to a small fraction of the technology industry. The second version of MO-CRIA incorporates more considerations of online impacts, but given its sector-specific focus, does not enable comprehensive assessment of all risks to children in the digital environment, especially those facilitated by social media and entertainment platforms. Finally, as a “self-assessment” tool, external stakeholder engagement is recommended but not required in the assessment process.

- **Common Framework of Reference on Child Rights Impact Assessment: A Guide on How to Carry Out CRIA**, ENOC (European Network of Ombudspersons for Children) 2021— Intended for government and other public authorities, this guidance introduces the meaning and value of CRIs uses an eight-step methodology, and provides a collection of “CRIA resources” that includes a CRIA checklist, a CRIA self-assessment template, and child-friendly CRIA templates and information about the process. The simple format of this guidance works well for governments because their CRIs are naturally more high-level/ big picture than the type of CRIA a business would conduct.

See [Section 4](#) for a specific review of CRIA tools addressing the digital environment.

### 3.3.4 Key Observations

Following review and analysis of the materials above and stakeholder interviews, BSR has drawn the following conclusions:

- **There is a broad spectrum of useful resources.** Some provide insights on risks to children (i.e., substantive analysis and information) while others provide direction on how to assess impacts to children’s rights (i.e., process guidance). Assessing and addressing impacts on children requires a combination of both substantive and process-based resources.
- **The assessment of child rights in the digital environment requires targeted guidance.** While there are resources relating to child rights in business, guidance that is not specific to the digital environment can miss important impacts that are salient in the digital environment. Most



existing resources do not adequately address the unique characteristics of the digital environment, such as the rapid evolution of products, uncertainty about how products may be used in practice, and the way in which children tend to be both early adopters and use products in ways adults might not imagine. Core concepts relating to child rights in the business context need to be translated to the digital environment to more effectively address the unique ways in which children are impacted in the digital environment.

- **Most resources focus on select child rights, not all of them.** There are many resources that help stakeholders consider child rights in the digital environment; however these resources tend to focus on a subset of rights (like privacy and safety) rather than the comprehensive list of child rights set out in the CRC. The UNGPs clearly state that human right assessments should include all internationally recognized human rights as a reference point because companies may impact virtually any of these rights.
- **Child rights terminology is used inconsistently.** Many otherwise very helpful resources use language from the fields of user-experience design, and trust and safety, rather than rights-based terminology.<sup>39</sup> This can contribute to a dynamic, observed in our interviews with companies, that they may be addressing many relevant topics but are not conversant in child-rights language and frameworks. This affirms the need for a more comprehensive tool for assessing all child rights impacts in the digital environment.
- **There are few resources that detail what a CRIA should entail.** The majority of those that exist are intended for governments conducting CRIAs, likely due to the fact that CRIA is a common practice in the public sector and an emerging practice in the private sector. When specific to companies, there are very few resources that explain how a CRIA of the digital environment (or a segment thereof, like telecommunications) should be conducted. This shows that the more specific to the context of the business the resources are, the better.

### 3.4 CRIA Methodologies

Once the need to assess child rights in the digital environment becomes clear, the question of methodological approaches emerges. Resources like General Comment No. 25 and the OECD Risk Typology affirm the need to consider impacts to children’s rights but don’t offer a definitive process for doing so. Electing to assess impacts through a CRIA process helps ensure that a company adheres to the UNGPs by assessing impacts on all rights,

39 User experience design in the digital environment is concerned with product and platform branding, design, usability, and function. Learn more at [Interaction Design Foundation](#).

40 DIHR and UNICEF, [Children’s Rights in Impact Assessments](#), 2013.

engaging children as impacted rightsholders, and taking appropriate action to address their adverse impacts.<sup>40</sup>

### 3.4.1 What Is a CRIA?

A child rights impact assessment (CRIA) can be undertaken to understand how a business activity (e.g., product, service, feature, policy, operations) impacts child rights as defined in the CRC.<sup>41</sup> CRIAs can be conducted by a variety of stakeholders including state actors, companies, civil society, academia, and investors. CRIAs are similar to HRIAs, with the major difference being a focus on impacts to children and consultation of the CRC in addition to the International Bill of Human Rights.<sup>42</sup>

The Danish Institute for Human Rights (DIHR) has developed 10 criteria for conducting HRIAs, which are also applicable to the context of CRIAs.<sup>43</sup> The criteria were informed by a comprehensive literature review of HRIA guidance and developed in alignment with the UN Guiding Principles on Business and Human Rights. They are outlined below, along with annotations on how they should be applied within the framework of a CRIA in relation to the digital environment.

**1. Participation** Meaningful participation of affected or potentially affected rights holders during all stages of the impact assessment process. In the context of a CRIA, it may not be appropriate to engage children directly if there is insufficient structure or resources to thoughtfully consult them. In certain instances, consultation with child rights experts who have insights into and can advocate for children’s views and experiences, rather than direct engagement with children, will be the better choice.<sup>44</sup> In some instances, insights gained from engagement with children in other settings can usefully inform a CRIA, even if that engagement was not undertaken for the CRIA itself.

**2. Nondiscrimination** Engagement and consultation processes are inclusive, gender- and disability-sensitive, and take into account the needs of individuals and groups at risk of vulnerability or marginalization. Nondiscrimination in a CRIA context should also consider the different ways that age, and cultural and environmental factors impact a child’s vulnerability to discrimination, as well as other adverse impacts on their rights. For example, if a company seeking to engage diverse stakeholders decides to engage child users who identify as LGBTQIA+ for survey feedback, a concerted effort must be made to ensure that the child’s right to privacy is

CRIAs are similar to HRIAs, with the major difference being a focus on impacts to children and consultation of the CRC in addition to the International Bill of Human Rights.

41 Digital Futures Commission, Child Rights Impact Assessment, March 2021.

42 The International Bill of Human Rights consists of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>.

43 UNICEF, MO-CRIA: Child Rights Impact Self-Assessment Tool for Mobile Operators, 2019.

44 UNGPs Article 18 states that “In situations where such consultation is not possible, business enterprises should consider reasonable alternatives such as consulting credible, independent expert resources, including human rights defenders and others from civil society.”

also protected, perhaps by prohibiting parental visibility into their child’s survey responses. Recognizing the interconnectedness of rights, efforts to ensure diverse participation, nondiscrimination, and empowerment require that children’s right to privacy be considered and upheld.

**3. Empowerment** Provide resources and/or training to individuals and groups at risk of vulnerability or marginalization to enable meaningful participation in the assessment. In the context of a CRIA, it is essential to work with child engagement experts to ensure that capacity building exercises with children are not infantilizing, and acknowledge that children experience the digital environment differently than adults, and that girls’ and boys’ experiences and vulnerabilities differ.<sup>45</sup>

**4. Transparency** The impact assessment process is as transparent as possible to affected or potentially affected rights holders, without causing any risk to security and well-being of rightsholders. For a CRIA, information prepared for transparency reasons should include information designed to be appropriate, accessible, and engaging for children.

**5. Accountability** The impact assessment team is supported by human rights expertise, and the roles and responsibilities for impact assessment, mitigation, and management are assigned and adequately resourced. The impact assessment identifies the entitlements of rights holders and the duties and responsibilities of relevant duty-bearers (e.g., the company, contractors and suppliers, local government authorities, etc.). For CRIAs specifically, the assessment should be supported by individuals with child rights expertise.

**6. Benchmark** Human rights standards, particularly the CRC, constitute the benchmark for the impact assessment. Impact analysis, assessment of impact severity, and design of mitigation measures are guided by international human rights standards and principles. For a CRIA, the CRC must always be consulted as a key international human rights instrument. UN General Comment No. 25 on Child Rights in Relation to the Digital Environment is another essential resource to consult for its explanation of how children’s rights can be impacted in the digital environment.

**7. Scope of Impacts** The assessment includes actual and potential impacts caused or contributed to by the business, as well as impacts directly linked to operations, products, or services through business relationships (contractual and noncontractual). The assessment includes cumulative impacts as well as legacy issues (e.g., the rights impacts associated with the activities of previous business operators, such as the acquisition of a company that collected vast amounts of user data without explicit consent).

45 Levels of internet connectivity and technology use vary according to geography, income level, and gender. <https://data.unicef.org/resources/ictgenderdivide/>.

**8. Assessing Impact Severity** Impacts are addressed according to the severity of their human rights consequences. This includes considering the scope, scale, and irremediability of particular impacts, and taking into account the views of rights holders and/or their legitimate representatives.

**9. Impact Mitigation Measures** All human rights impacts are addressed. Where it is necessary to prioritize actions to address impacts, severity of human rights harms should be used to determine prioritization. Addressing identified impacts follows the mitigation hierarchy of “avoid-reduce-restore-remediate.”

**10. Access to Remedy** Impacted rights holders have avenues whereby they can raise grievances regarding the impact assessment process and outcomes. Impact assessment and management ensure that the business provides for or cooperates in access to remedy for impacted rights holders. In the context of CRIAs, given children’s developing mental capacities and the differences between age groups, it is important to have diverse grievance and remedy options and ensure that remedy can be available for a long period of time (e.g., as they age and mature), in the event a child’s maturation or change of circumstance changes their rights impacts.

**3.4.2 CRIA Approaches:**

Originally, CRIAs were conducted by state actors to understand the impact that policy and programmatic decisions will have on child rights.<sup>46</sup> CRIAs were later adopted by companies as part of their responsibility to respect human rights and in acknowledgment of the need to consider impacts to children distinctly from impacts to adults.<sup>47</sup> While public and private sector stakeholders approach CRIAs differently, the ultimate benefits are similar because a CRIA

- assesses impacts against all child rights as defined in the CRC;
- leverages internationally accepted human rights/child rights instruments;
- can complement existing human rights due diligence (HRDD) or impact assessment (HRIA) processes;<sup>48</sup>
- enables early consideration of risks (and sometimes opportunities); and
- encourages proactive stakeholder engagement that can reveal knowledge gaps and support the creation of effective mitigation actions.

There is no definitive methodology for CRIAs. However, the CRC General Comment No. 14 on the right of the child to have his or her best interests taken as a primary consideration states that all CRIAs should

- use the CRC and its optional protocols as a framework;

46 Digital Futures Commission, Child Rights Impact Assessment, March 2021.

47 UNICEF, MO-CRIA: Child Rights Impact Self-Assessment Tool for Mobile Operators, 2019

48 Payne, Lisa, Child Rights Impact Assessment as a policy improvement tool, The International Journal of Human Rights, 2019.

- consider the different impacts that children experience compared to adults;
- be based on input from children, civil society, subject matter experts, relevant governmental agencies, academic research and all available data;
- result in appropriate actions to address risks; and
- share key findings publicly.<sup>49</sup>

The aforementioned CRIA guidance, published CRIAs, CEN-CENELEC’s *Age Appropriate Digital Services Framework*, and the 2021 *CRIA Report* by 5Rights and the Digital Futures Commission evaluating global CRIA practices contain similarities in the high-level steps involved in a CRIA.<sup>50</sup> With moderate variation, they almost always include the following steps:

1. **Define scope:** Define the scope being evaluated (policy, product, feature, program, etc.).
2. **Gather data:** Gather data (e.g., size of impacted population, prevalence of issue, etc.).
3. **Engage stakeholders:** Consult with children, internal and external subject matter experts, civil society, and other relevant stakeholders as appropriate.
4. **Assess impacts:** Assess risks and opportunities (using CRC articles and CRBPs).
5. **Identify appropriate action:** Determine how actual and potential adverse impacts should be avoided, prevented, mitigated, and remedied.
6. **Communicate findings:** Communicate findings publicly or with relevant stakeholders.
7. **Ongoing due diligence:** Integrate findings into the ongoing due diligence, track progress, and refresh and revise over time as circumstances change.

The following sections leverage desk research and interview insights to summarize how different categories of actors *approach* the multistep CRIA process. The *outputs* of their CRIA processes are analyzed in [Section 5](#). Reviewing the standard approaches to CRIAs is a helpful precursor to assessing CRIA tools because it conveys the complexity of approaches and helps highlight the shortcomings of existing tools.

### 3.4.3 Company CRIA Practices

Companies are not legally obligated to conduct CRIAs. However, companies should undertake CRIAs to help fulfill their responsibilities under the UNGPs to identify and address salient child rights issues when deploying new products, services, and features, and/or as part of risk

Companies are not legally obligated to conduct CRIAs. However, companies should undertake CRIAs to help fulfill their responsibilities under the UNGP.

<sup>49</sup> United Nations Committee on the Rights of the Children, *General Comment No. 14 on the right of the child to have his or her best interests taken as a primary consideration*, paragraph 99, May 2013.

<sup>50</sup> 5Rights Foundation and the Digital Futures Commission, *Child Rights Impact Assessment Report*, 2021.

assessment processes increasingly required by regulations.

BSR’s analysis of CRIAs and stakeholder interviews found that the decision to undertake a CRIA may be activated by a range of factors, including

- human rights due diligence (HRDD);
- other risk assessment processes (such as HRIAs, human rights salience assessments, or systemic risk assessments) that identify child rights as a salient or material issue in need of further review;
- shareholder resolutions;
- stakeholder or civil society pressure; and
- internal escalation processes.

Companies may conduct CRIAs or assessments that include specific child rights considerations as part of an internal, company-led exercise, or as part of a process supported by a third party. Within technology companies, assessment of risks to children are often embedded within functions such as trust and safety, privacy, human rights, safety by design, and responsible innovation. In many interviews, companies stated that they engage third parties to provide expertise and support on CRIAs. Insights provided on this topic appear in [Section 5](#).

Whenever a business undertakes a CRIA there are various actors involved, including

- the assessment team (can be internal employees, third-party consultants, or a mix);
- external stakeholders engaged as part of the due diligence process (can be academics, subject matter experts, and/or children engaged for the assessment);
- the reviewers (can be the entity who commissioned the CRIA, such as company leadership, or the entity who requested the CRIA, such as investors); and
- the accountability leads who track implementation of recommendations (typically this is internal to the company), and conduct ongoing due diligence.

### 3.4.4 Public Agency CRIA Practices

Governments that have ratified the CRC are obligated to respect, protect, and fulfil children’s rights and submit reports to the UN Committee on the Rights of the Child on their efforts within two years of ratification and every five years thereafter.<sup>51</sup> There is no rule for exactly when a state party must conduct a CRIA; however, CRC Article 3 states, “In all actions concerning

51 UNICEF, “How the Convention on the Rights of the Child works,” “Frequently Asked Questions.”

52 UN Convention on the Rights of the Child, Article 3, 1989.

children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration. States parties [...] shall take all appropriate legislative and administrative measures.”<sup>52</sup> In practice, local governments and policymakers are expected to undertake CRIAs to identify the salient child rights issues to address when introducing regulations or new programs, making financial decisions, or applying political pressure to particular industries.<sup>53</sup>

Governments may conduct CRIAs as standalone assessments, or as part of other assessments. A global survey of government-led CRIAs found that European jurisdictions undertake more CRIAs than any other region.<sup>54</sup> The government of Wales is fastidious in undertaking and publishing CRIAs; in 2023, 14 CRIAs with scopes including air quality standards, housing programs, and criteria for educator credentialling were conducted.<sup>55</sup> Governments have also embedded child rights considerations into HRIAs, Privacy and Data Protection Impact Assessments, Environmental Impact Assessments, and more.<sup>56</sup>

Guidance for state parties undertaking CRIAs, including the ENOC Framework, Canada’s CRIA Template, and UNICEF UK Template, suggest initial CRIA screenings be done at the early stages of policy or program development, and comprehensive CRIAs be conducted if the initial screening indicates potential adverse impacts to children’s rights.

Governments across Europe and Latin America regularly conduct CRIAs, but they are not specific to the digital environment. Governmental CRIAs tend to focus on topics that are clearly under their influence, such as government-run programs, new policies, and budget decisions.<sup>57</sup>

**3.4.5 Academia CRIA Practices**

Academic research and perspectives on how the digital environment impacts children’s rights are critical to the data collection and engagement phases of CRIAs. Research findings provide useful context, benchmarks, and substantiation for impact assessments that can help the business team leading the CRIA contextualize their services within the harm landscape and affirm the importance of mitigating adverse impacts.

Academics are also important subject matter experts to consult with on impact trends and engage when undertaking child engagement or seeking to incorporate the perspectives of children in CRIAs. In some cases, academics author essential CRIA guidance and tools, such as a report on CRIAs published by Dr. Kruakae Pothong, Professor Sonia Livingstone,

53 Payne, ENOC Synthesis Report on CRIA, 2020.

54 Payne, ENOC Synthesis Report on CRIA, 2020.

55 Government of Wales, Children’s rights impact assessments 2023, 2 February 2023.

56 Payne, ENOC Synthesis Report on CRIA, 2020.

57 5Rights and the Digital Futures Commission report, “governments have conducted CRIA in Austria, Belgium (Flanders), Bosnia and Herzegovina, parts of Canada, Finland, Ireland, parts of New Zealand, and Sweden. In Ireland, Latvia, Luxembourg, the Netherlands and Norway, CRIA manifests through consideration of children’s rights as part of Human Rights Impact Assessment. To the best of our knowledge, CRIA’s adoption in the Global South (in South Africa, India, Malaysia, Rwanda, Tanzania, Bolivia, Colombia, El Salvador and Costa Rica) is driven by UNICEF and its partnerships with national governments and businesses.” 5Rights Foundation and the Digital Futures Commission, Child Rights Impact Assessment Report, 2021.

58 5Rights Foundation and the Digital Futures Commission, Child Rights Impact Assessment Report, 2021.

59 Leiden University, Children’s Rights Impact Assessment—Fill-in document, 2023.

and Sudeshna Mukherjee in 2021,<sup>58</sup> and a CRIA tool published by Leiden University in 2023.<sup>59</sup>

### 3.4.6 Practices for Incorporating Children’s Perspectives into CRIAs

Governments that have ratified the CRC are obliged to consider the views of children through CRC Article 12, which asserts “parties shall assure to the child who is capable of forming his or her own views[,] the rights to express those views freely in all matters affecting the child, the view of the child being given due weight in accordance with the age and maturity of the child.”

UNGP Article 18 asserts that companies’ assessment of human rights impacts rights should “involve meaningful consultation with potentially affected groups.” The CRBPs state that companies should identify and assess impacts on children’s rights through child participation processes that are “authentic, inclusive, and meaningful.”

Beyond these principles, government, companies, and other stakeholders conducting CRIAs benefit from hearing directly from children because it provides insights that that may not be heard elsewhere. These insights can inform the development of policies, feed into the sustainability strategies and long-term goals, and help develop appropriate grievance and remediation mechanisms.<sup>60</sup>

Meaningful engagement with children and their families delivers benefits to all involved, and while there are many forms of guidance, there is also widespread uncertainty on the best ways to do it.<sup>61</sup> Common concerns about engaging children include

- difficulty of engaging children under 18 due to ethical, consent, and data storage requirements;
- difficulty of recruitment, especially across diverse geographies;
- complications of parental accompaniment of the children in research activities; and
- potential that children won’t understand the concepts.<sup>62</sup>

For many children, when done correctly, engaging with industry and civil society about technology offers them social and educational development opportunities. Children report wanting to be engaged in ways that make them feel valued, supported, heard, respected, safe, and self-confident.<sup>63</sup> For CRIAs, this means engaging with children through approaches that are suitable for how they want to participate, and how they can participate.

60 [Lego, Kids Included](#), 2022.

61 Guidance includes [UNICEF’s Engaged and Heard!](#) (2020) and [Lego’s Kids Included](#) (2022).

62 Insights provided by child rights experts Amanda Third and Lilly Moody of Western Sydney University. Further insights from their expertise on child engagement will be directly embedded in the CRIA tool.

63 Kellett, M., [Children as active researchers](#), ESRC, UK, 2005.



# 4. CRIA Tools in Relation to Technology

## 4.1 Overview

In addition to the guidance discussed in Section 3, various tools have been developed to help companies, public entities, and civil society organization assess impacts on child rights. This section focuses on the subset of these tools that provide step-by-step instructions on CRIAs.

To understand the landscape of published CRIA tools, BSR conducted a landscape assessment of CRIA tools available in English. Materials identified were categorized as “tools” if they were designed to be completed or “filled out” as part of a step-by-step assessment. Tools are more instructional and process-specific than guidance documents or design guides and are mostly offered to assessors in a format that provides space for responses, such as a spreadsheet (most often an excel file), an editable text document, or a web page.

BSR then categorized tools according to type, creator, audience, and format. BSR found that UNICEF is the primary developer and publisher of tools for use by companies, while governmental agencies have previously published tools for public authorities or for stakeholders with regulatory compliance obligations more broadly.

In addition to eight CRIA tools, BSR analyzed tools that are “CRIA-adjacent” because many stakeholders referenced these tools when questioned about how they assess impacts to child rights. The categories assigned to these tools reflect the purpose of the tool. For example, “CRIA” tools were developed specifically for child rights impact assessments, whereas “Policy” tools were developed to help assess regulatory compliance. The “Other” category captures tools that support assessment of one or more child rights, such as privacy or right to health, but do not include a comprehensive child rights framework. BSR did not include HRDD and HRIA tools in this CRIA tool analysis because they do not focus specifically on child rights.

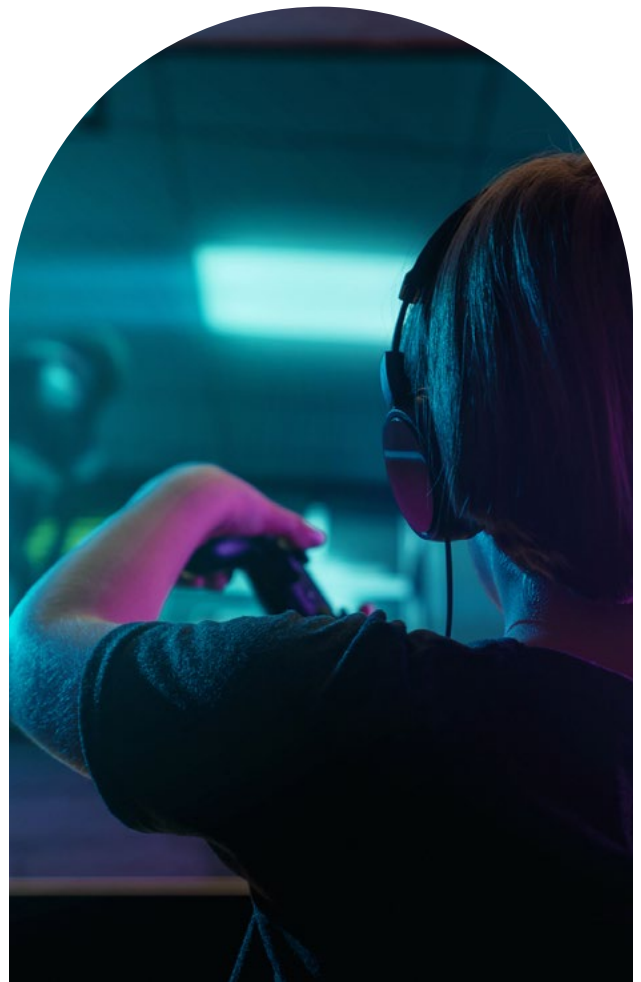
**Table 2: Published Tools for CRIAs and Related Assessments**

#	Type	Tool Name	Created by	Audience	Format
1	CRIA	<a href="#">MO-CRIA: Child Rights Impact Self-Assessment Tool</a>	UNICEF (2021)	Mobile operators	Spreadsheet
2	CRIA	<a href="#">Leiden CRIA "Fill-in Document"</a>	Leiden University (2023)	ICT companies	Document
3	CRIA	<a href="#">Children's Rights in Impact Assessments</a>	UNICEF, DIHR (2013)	Companies	Document
4	CRIA	<a href="#">CRIA Template for Local Authorities</a>	UNICEF UK (2021)	Public authorities and CSOs	Document
5	CRIA	<a href="#">Child Rights Toolkit—Module 5 CRIA</a>	UNICEF and EU (2014)	Policymakers and CSOs	Checklist
6	CRIA	<a href="#">A Guide on How to Carry Out CRIA</a>	ENOC (2020)	Public authorities	Document
7	CRIA	<a href="#">CRIA Template</a>	Canadian government (2023)	Public authorities	Website
8	CRIA	<a href="#">CRIA Self-Assessment Tool</a>	Wales Children's Commissioner	Public authorities	Document
9	Policy	<a href="#">Child Online Safety Assessment (COSA) Tool</a>	UNICEF (2016)	ICT companies	Spreadsheet
10	Policy	<a href="#">Children's Code Risk Assessment Tool</a>	UK ICO (2023)	ICT companies	Spreadsheet
11	Other	<a href="#">Fundamental Rights and Algorithm Impact Assessment</a>	Netherlands government (2022)	Government	Document
12	Other	<a href="#">Data Protection Impact Assessment Tool</a>	UK ICO (2018)	Anyone subject to GDPR	Document
13	Other	<a href="#">Children's Online Privacy &amp; Freedom of Expression</a>	UNICEF (2018)	Companies	Toolkit
14	Other	<a href="#">Children and Digital Marketing: Industry Toolkit</a>	UNICEF (2018)	Companies	Toolkit
15	Other	<a href="#">Child Safeguarding Toolkit for Business</a>	UNICEF (2018)	Companies	Toolkit
16	Other	<a href="#">Children Are Everyone's Business Workbook 2.0</a>	UNICEF (2014)	Companies	Document
17	Other	<a href="#">Children's Rights and Well-Being Impact Assessment</a>	Scottish government (2019)	Public authorities and CSOs	Document

## 4.2 CRIA Tools Analysis

The following high-level themes are key findings from BSR’s review of publicly available child rights and digital safety tools:

- **Tools consistently reference the UNGPs and CRC.** When providing rationale for why an entity should use the tool, all reference the UNGPs and cite the CRC as the applicable human rights instrument. In all cases, discussion of the UNGPs and CRC is introductory and broad. No tool lists all the UNGPs or all 54 articles of the CRC.
- **Tools rarely reference specific regulations.** Except for the “policy” tools designed specifically to assess regulatory compliance, few tools make reference to specific regulations. The benefit of citing applicable regulations within a tool is that it may encourage use by companies that would otherwise skip it because they feel they only have the capacity to undertake assessments that support their compliance initiatives. The potential downsides include the tool becoming outdated if not regularly updated and republished, taking the attention away from “voluntary” efforts, or creating the impression among companies not subject to the referenced regulation that the tool is not intended for them.
- **Tools are either broad or in-depth, but not both.** Tools that “go deep” or are industry specific (e.g., MO-CRIA) run the risk of seeming inapplicable to other sectors or less-resourced companies, but tools that are broad do not provide sufficient rigor to enable in-depth analysis required or expected by rights holders or other stakeholders. For example, the MO-CRIA tool designed for mobile operators has sections devoted to network operations or mobile device safety that are not applicable to other sectors. As such, nonmobile operator assessors will not benefit from the full capacity of the tool. In contrast, the Leiden University CRIA tool for assessing impacts in the digital environment takes a broad approach to assessing risks to children that does not prompt considerations of specific vulnerability factors such as age, gender, or location. As such, it may be less comprehensive for assessors with products, platforms, or services that are used globally by a wide range of children.



- **Tools focus on risks much more than opportunities.** Existing tools are primarily oriented toward the identification and assessment of risks to competing rights, though approximately half of the tools analyzed ask one or two questions about the actual or potential benefits of the service/product for competing rights.
- **Tools do not address competing rights.** None of the tools provide guidance on how to address competing rights (e.g., potential tensions between the right to privacy protected by end-to-end encryption and the right to protection from exploitation or abuse that may be enabled by platform visibility into user content). Child rights can compete with one another for legitimate reasons. Rather than “offsetting” one right against another, it is important to pursue the fullest possible expression of both rights and identify how potential harms can be addressed. This is a common challenge for companies seeking to balance user safety and privacy. For example, some companies may think that the best response to the privacy risks created by data collection or message monitoring is to abstain from collecting any data at all. However, lack of data can interfere with a company’s ability to protect children from harms, identify victims or dangerous trends, or collaborate with law enforcement agencies. It is important to remember that all human rights and child rights are interdependent, non-hierarchical, and indivisible. A child’s right to privacy can be limited, but limitations must be necessary and proportionate. When determining necessity and proportionality, companies should consider the underlying principle of the impacted or restricted right, then ensure restrictions are justified and necessary (e.g., there is no other way to achieve the same ends), and prohibit discriminatory implementation (e.g., apply the measure to all children, not just certain groups). Examples of how to counterbalance privacy and other rights impacts are available in BSR’s HRIA Report on [Meta’s Expansion of End-to-End Encryption](#).
- **Tools are geared toward assessors with limited established child rights assessment processes or minimal experience conducting CRIsAs.** The presentation of information and assessment questions assumes that assessors have not conducted a CRIA previously and do not have internal assessment processes set up.
- **Format of the tool can influence the depth of assessments.** Spreadsheet tools allow for more thorough analysis of current practices than “fill-in” documents, webpages, or checklists. The MO-CRIA assessment workbook is a good example. It allows for a deep-dive assessment by blending quantitative and qualitative inputs, including
  - › degree to which baseline expectation is being met (yes, no, N/A);

- › degree to which actions that qualify as leading practice are taken (yes, no, N/A);
- › narratives substantiating responses for items 1 and 2;
- › evidence substantiating responses for items 1 and 2;
- › a summary of identified gaps in the company’s efforts; and
- › level of risk (high, medium, low)

By creating a designated space for each of these categories, assessors are forced to reflect and enter data.

In contrast, some tools have empty text boxes with fewer prompts and no guidance about the format of responses (e.g., multiple choice, short/long form, quantitative, etc.). BSR piloted these tools and found that more prescriptiveness translated into more thoughtful analysis.

Finally, technology companies are very data-driven, so tools that facilitate a quantitative output (e.g., a risk score) allow platforms to prioritize remediation efforts. The ranking functionality that a spreadsheet tool enables acknowledges that not every remediation will be able to be done at the same time, which is why it is helpful to differentiate the critical items from the ones that are not as urgent. Although quantitative data can support impact assessment, many impacts are qualitative and contextual and cannot be solely assessed through quantitative means. It is important to communicate the limitations of quantitative information, to avoid implying false precision in risk assessments.

### Identified Gaps

Existing CRIA tools provide assessors with a starting point when assessing risks to children. However, there remain gaps that should be addressed to increase the rigor and frequency of CRIs undertaken in the industry. Gaps identified across existing CRIA tools include the following:

- **There is little to no meaningful guidance on how to responsibly engage children and make sure their perspectives are represented.** Tools expect that children’s perspectives will be collected and incorporated, but there is a lack of practical guidance on how to conduct engagement in a well-thought out and responsible manner, or on acceptable alternatives that can be pursued if direct engagement is not feasible or appropriate.
- **Existing CRIA tools are designed to operate independent of other assessment processes.** The tools are not designed for incorporation into broader HRDD processes, or for integrated use in HRIAs or other assessments. This may reduce their impact, or create the impression that CRIs are exclusively distinct undertakings that require significant

resource investment and result in less take-up by potential assessors due to perceived capacity and/or resource constraints.

- **Tools do not provide guidance on how to assess risks related to new and emerging technologies.** None of the identified tools provide guidance on how assessors can evaluate the potential impacts that new technologies may create. As discussed in the [OECD's revised risk typologies](#), technologies like generative AI, biometrics, predictive analytics in education, and sentiment analysis in healthcare are some of the emerging use cases that introduce new risks and benefits to the digital environment, especially for children. There is a need for CRIA tools that help assessors unpack the new ways in which risks may manifest with the use of emerging technologies. To enable this, tools must prompt assessment teams to “think outside the box” of current understanding of risks and ask creative questions that have not been considered before.



None of the identified tools provide guidance on how assessors can evaluate the potential impacts that new technologies may create.

- **Tools are not sufficient standalone resources. In most cases, other resources need to be used alongside the tool to conduct a holistic assessment.** For example, besides MO-CRIA, existing tools do not provide guidance on assessing distinct types of technologies. Furthermore, none of the tools provide a full list of all child rights; they expect assessors to be familiar with the CRC or to educate themselves. This can create barriers to tool adoption if assessors do not feel like the tool is directly applicable to their work, and/or if they do not have child rights expertise or familiarity with the child rights framework. On the other hand, including too many additional resources as part of the tool may overwhelm less mature or less resourced companies and may deter some stakeholders from using it.

- **Tools that presuppose salient impacts or allow assessors to self-report may miss key impacts.**<sup>64</sup> Some CRIA tools list predetermined salient impacts, based on known issues related to technology use by children. While this may seem like a practical approach, these tools miss a significant opportunity to assess adverse impacts against the full list of child rights and identify unanticipated impacts, reducing the effectiveness of the assessment. This approach is unlikely to meet human rights assessment expectations set out in the UNGPs.
- **Tools do not consistently use child rights terminology.** Risks to children are often presented to the user as “safety” or “developmental” risks, instead of risks to the “right to life” or “right to freedom of expression.” Utilizing child rights terminology when discussing rights impacts is not required, but it does help ensure alignment with the UNGPs, build awareness, and make connections to other related human rights work.

In fact, a CRIA tool that shows the overlaps between child rights and child safety terminology could lessen some stakeholders’ apprehension to undertake a CRIA. A simple graphic can help map child safety terms to the relevant child rights concepts. For example, a popular phrase in technology companies’ safety-by-design vocabulary is “providing users with safety tools and features” that allow them to block other users or report harmful content or accounts. The graphic can demonstrate how user blocking is a way to enable a child’s right to freedom from sexual exploitation and from mental and physical abuse; and how the user reporting empowers a child to practice their right to remedy.

- **Company examples are not provided.** Examples of company experiences or case studies can help demonstrate how CRIs improve awareness of salient issues and support business objectives. Such examples can serve as a helpful signpost to others, increase the accessibility of tools, and help create buy-in from decision-makers within organizations.
- **Tools prompt inward reflection about processes and product features, but do not facilitate nuanced consideration of impacts across the technology ecosystem and value chain.** Adverse impacts from technology can often be amplified by other participants within the technology ecosystem. As adequate mitigation in those instances may require collaboration and collective efforts, it can be important for companies to reflect on their role within the ecosystem and consider industry-wide impacts. For instance, harassment or bullying content may often emerge on one product or platform before migrating to or being amplified on other products or platforms. At the onset of this work, BSR was hopeful that the Across the Stack tool we developed in

64 “The concept of salience is intended to help focus a company’s resources on managing human rights risks that have the potential to do severe harm or that are most likely. Salient human rights impacts are identified by evaluating their severity (described in the UNGPs as a combination of scope, scale, and remediability) and likelihood.” To learn more, see <https://www.bsr.org/en/reports/human-rights-assessments-identifying-risks-informing-strategy>.

partnership with GNI could be adapted into a CRIA tool. The Across the Stack tool was an appealing option because it maps different segments of the technology ecosystem and provides high-level human rights issues and due diligence “questions” for stakeholders in each segment to consider. Accordingly, Across the Stack necessarily takes a broad view and surfaces the “key HRDD issues” assessors should consider, which is contrary to the comprehensive CRIA methodology of considering all rights and then prioritizing according to salience. This challenge exemplifies how a tool that is built broadly as a way of ensuring accessibility can hinder a comprehensive assessment of actual and potential impacts on child rights.

- **Discussion on competing rights is largely absent.** In certain contexts, different rights may compete with one another. In such instances, companies lack guidance on how to approach resolving such tension and respecting all rights to the greatest extent possible. Child rights compete with one another for legitimate reasons, and rights-based methods can be deployed to define a path forward when two competing rights cannot both be achieved in their entirety. Rather than “offsetting” one right against another, it is important to pursue the fullest possible expression of both rights and identify how potential harms can be addressed. This is consistent with the notion that most child rights are not absolute, there is no hierarchy of rights, and most rights can be limited in certain legitimate circumstances.
- **Lack of clear guidance on when CRIs should be undertaken.** Stakeholders note that conducting CRIs requires a significant investment of time and resource that can result in CRIs being deprioritized in favor of HRIs or other assessments that are broader. The investment required also means that stakeholders often consider CRIs as a “one-and-done” assessment. As such, it is important to establish guidance on when a CRIA should be undertaken or triggered.
- **Organizing content for one type of organization makes tools feel unfit for others.** Organizing questions according to the relevant stakeholder or business function may work well for large companies that have more traditional team structures (e.g., Legal, Trust and Safety, Marketing, etc.) but may limit applicability or utilization for smaller entities with fewer resources or different structures and team organization.



## What Works Well

Tools for assessing child rights play a crucial role in safeguarding the well-being of children because they provide valuable structure to teams and can engage stakeholders who otherwise may not feel prepared or inclined to consider their impact on child rights. Although many existing tools remain a work in progress, they are a useful starting point. BSR's analysis of tools and interview feedback led to the identification of the following ideal tool characteristics:

- **Providing guidance documentation and explanatory presentations that accompany the assessment tools.** Before starting a CRIA, a company needs to understand its purpose and rationale. Clear guidance materials can
  - › explain the reason for and purpose of a CRIA;
  - › help identify key stakeholders for consultation;
  - › build internal support for the process; and
  - › distinguish between a formal CRIA and a self-assessment tool. CRIAs use UN Guiding Principles methodology to uncover potential issues and score them based on universal severity criteria. In contrast, self-assessment tools allow companies to define and evaluate risks based on their own criteria.
- **Providing guidance (such as a “read-me” tab) that defines key terms and underlines the purpose of a CRIA, to ensure that assessors are informed even if they did not review the accompanying guidance document.** To ensure that the tool is used as intended, it is important to provide brief instructions on the first tab of the spreadsheet because not everyone will read supporting guidance documents.
- **Providing example risk statements.** In the field of risk management (both HRIAs and beyond) risk statements are used to clearly convey how potential adverse impacts may arise in practice, such as who may be



Tools for assessing child rights play a crucial role in safeguarding the well-being of children because they provide valuable structure to teams and can engage stakeholders who otherwise may not feel prepared or inclined to consider their impact on child rights.

impacted and how they may be impacted. Risk statements provide a core focal point for risk assessment (e.g., each risk statement is deliberately assessed and scored) and the use of risk statements can increase synergy with other risk assessment processes, such as regulatory risk, human rights due diligence, and enterprise risk management.

- **Telling assessors what functions and/or types of team members should be included to assess impacts.** Child rights are impacted in different ways across the technology ecosystem. An example list of contacts or roles to connect with is useful to ensure that relevant people are not erroneously excluded from consultation. It also helps ensure that a diversity of perspectives informs the assessment and uses the CRIA as an opportunity to educate product managers, engineers, and leadership about the importance of child rights considerations.
- **Asking targeted questions about rights impacts in all stages of the value chain** (e.g., hardware, software, data management, procurement, marketing, etc.). Child rights impacts manifest differently at each stage of the technology or company value chain. Creating distinct questions about impacts at each phase ensures that one impact is not unduly considered as the “most relevant.” For example, asking a question about child rights impacts at the hardware stage may solicit information about child labor, while asking that same question at the marketing stage may solicit information about discrimination and access to information.
- **Combining drop-down selection categories with narrative responses.** Providing assessors with a drop-down menu they can select from supports efficiency and allows for straightforward data aggregation. Providing boxes for short- and long-form narrative responses allows assessors to elaborate and discuss borderline issues.
- **Ease-of-use is important but should not sacrifice methodological rigor.** Across stakeholder groups, interviewees cited time constraints and expressed a desire for tools that could be modular and make the CRIA process “easy.” Tools with simple formatting, a modest number of prompts, and clear visual depictions of the most salient impacts are easy to use, but too much simplicity can result in inadequate assessment quality. Tools that segment in-depth questions according to different teams and/or function can help relieve instances of assessment fatigue or lack of capacity.
- **Providing examples of how a risk may materialize in the digital environment or a particular sector of the technology ecosystem.** Not all stakeholders understand how impacts occur in the digital environment, so providing examples can foster new understanding.

- **Providing examples of leading practice.** In addition to detailing the baseline expectations for how to mitigate an adverse impact, tools should provide examples of the practices that leaders should undertake. Internal champions can use these examples to make the case for more robust mitigations when they are developing their recommendations.
- **Providing a template “action plan” for assessors to organize their mitigation actions and assign a responsible party and priority level.** To ensure that assessors continue to address impacts on children’s rights once they are identified, CRIA guidance should advise assessors on how to prioritize and assign next steps. Providing examples of mitigations relevant to different sources of risk and enabling assessors to evaluate which of them are accessible will make next steps more immediately actionable.
- **Helping assessors identify the ways their digital products and services are beneficial to children’s rights.** Respecting and protecting children’s rights is not limited to “protecting children,” but also includes identifying ways to ensure they can realize all their rights. Child rights experts consistently advocate for consideration of the ways that the digital environment has positively impacted children’s rights. While identifying risks is the paramount feature of CRIAs, it is beneficial to identify positive impacts because doing so acknowledges the nuance of child rights impacts in relation to the digital environment and can encourage companies to continue efforts that have positive outcomes. This is consistent with the emphasis in the CRBs on companies undertaking voluntary actions that seek to advance and support human rights.
- **Engaging and attractive formatting that entices design-oriented teams to use the resource.** Well-designed tools tend to be used more consistently and are referred more often to others. Visual appeal is a significant driver in tool adoption among product teams in technology companies.

# 5. Current Practices

This section presents key findings from BSR’s analysis of published and unpublished CRIAs and HRIAs, stakeholder interviews, and feedback received during two virtual roundtables.

To understand the landscape of CRIAs in the digital environment and the most significant challenges in the field, BSR conducted the following research activities on behalf of the UNICEF project to inform the development of a new global resource on CRIA:

- › **Interviewed 28 stakeholder groups** whose work centers on or involves the digital environment. The stakeholders interviewed included academics, policymakers, investors, and representatives from consulting companies, international organizations, civil society organizations from Europe, Asia, and Latin America, and companies headquartered in Europe, Africa, Asia, and North America.
- › **Analyzed 19 published assessments** (4 CRIAs, 15 HRIAs).
- › **Analyzed 24 unpublished assessments** conducted by BSR (4 CRIAs, 20 HRIAs).
- › **Solicited feedback from approximately 90 stakeholders** who participated in two virtual roundtables.

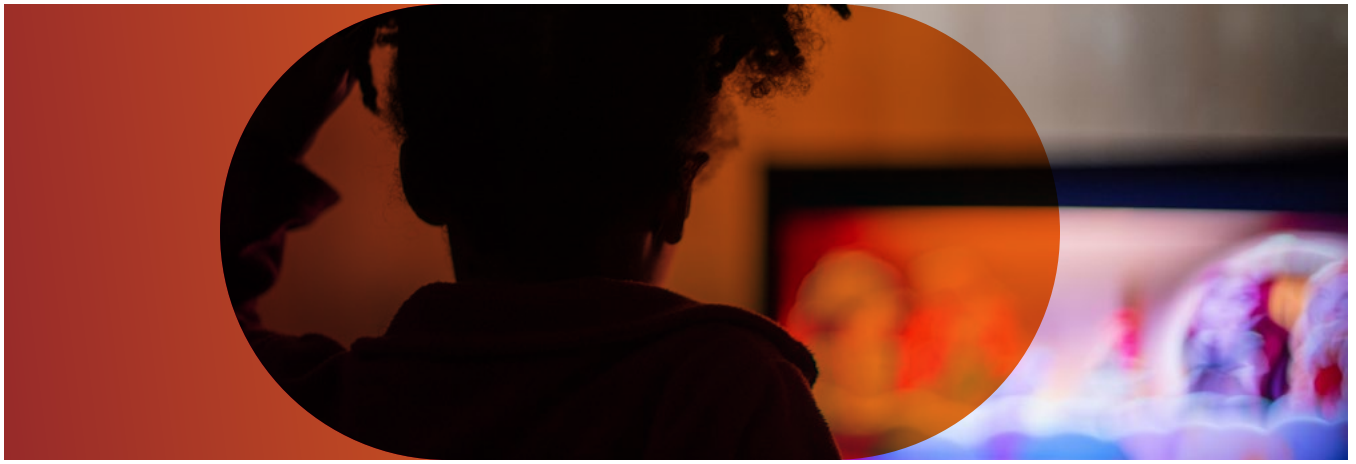
The stakeholders interviewed included academics, policymakers, investors, and representatives from consulting companies, international organizations, civil society organizations from Europe, Asia, and Latin America, and companies headquartered in Europe, Africa, Asia, and North America.



## 5.1 Stakeholder Interview Insights

### 5.1.1 Technology Industry Insights

- **Industry approaches to assessing impacts to children tend to be safety focused.** Well-resourced companies have teams that evaluate impacts to children through a safety lens, as part of existing human rights due diligence processes, or in response to regulatory requirements. These teams may be titled “Child Safety” or exist within Trust and Safety or Policy teams.
- **Frameworks used to assess child rights impacts vary.** Some companies assess impacts with a Convention on the Rights of the Child (CRC) framing, but it is far more common for companies to use a “safety by design” approach without reference to the CRC. Interviewees mentioned using the 4Cs Risk Typology (Content, Conduct, Contact, and Consumer), Tech Coalition’s “risk calculator,” and developmental psychology benchmarks to understand differences in risks by age group.
- **Companies may not acknowledge that their product or platform is used by children, especially those under the age of 13.** Some companies assert that they do not have under-13 users on their platforms because their policies prohibit it, while other companies acknowledge that children may circumvent policy restrictions and age-verification mechanisms to access the platform, product, service, or specific features.
- **Legal requirements and company commitments to respect user privacy can hinder company analysis of issues facing vulnerable groups.** Companies acknowledge that children are particularly vulnerable to harm when using their products or platforms. However, companies may have difficulty identifying children on the platform, especially if the user is not required to have an account to use the product or platform or if the child circumvents sign-in requirements. Furthermore, while companies acknowledge that children from certain groups may be particularly vulnerable (e.g., children with disabilities, children with limited digital literacy, or those from certain socioeconomic groups), vulnerability may be difficult to identify with specific case studies because limited data is captured during account creation. For example, account sign-up processes typically involve name, age, contact information, and sometimes gender identity, but do not inquire about sexual orientation, disability status, or conditions in their households that exacerbate their vulnerability. Accordingly, it is difficult for these platforms to scope and identify all types of vulnerability of their user base.



- **Companies tend to focus on a narrow set of issues.** This can increase the focus of CRIAs, but also creates a risk that other important impacts are missed. The issues that companies most frequently mentioned as key focus areas include
  - › child sexual abuse material (CSAM) and grooming
  - › privacy
  - › sexual extortion
  - › exposure to harmful content
  - › harmful conduct such as bullying and suicidal ideation
- **User feedback and user reports require thoughtful interpretation and translation because report content is not ready to use as submitted.** While appreciated, user feedback that comes through service or platform reporting channels may require interpretation and additional context to be insightful for child rights-related efforts. Feedback often needs to be accompanied by other forms of data and insights to meaningfully convey the risk and impacts that users experience. For example, companies do not receive reports that say, “a child’s freedom of expression was impacted,” but would need to contextualize and conduct further diligence to understand when and how child rights were impacted.
- **There is wide variation in approaches to assessing child rights.** Although few companies have conducted CRIAs, all interviewees reported assessing child rights as part of day-to-day business operations, systemic risk assessments, or standardized processes like trust and safety product reviews conducted before any new launch. Some companies have dedicated human rights (and sometimes child rights) expertise and adopt a human rights-based approach to their assessments; others situate child rights considerations in sustainability or responsible innovation teams and do not use human rights framing, concepts, or language.

- **Companies may decide to undertake CRIAs based on a range of factors or thresholds.** Most commonly, CRIAs are activated by human rights due diligence (HRDD) or other risk assessment processes that identify child rights as a salient or material issue in need of further review or regulatory requirements. Other factors that may activate CRIAs include:
  - › investor/shareholder or other stakeholder pressure
  - › new products or services that target children or anticipate a high number of child users
  - › notable increases in the number of children adopting or using a product or service
  - › regulatory pressures or requirements
  - › recent negative press or scandals
- **The authority of the team conducting the CRIA influences its impact.** Addressing or incorporating child rights-related actions within a company may be more effective when CRIA work is conducted by teams with decision-making power, such as legal or policy teams. Practices vary across companies; in some companies, child rights are considered by sustainability or human rights teams, while others tend to nestle child rights considerations under trust and safety or regulatory compliance functions.
- **Companies typically engage consultants to conduct CRIAs.** Reasons cited include
  - › *Expertise:* Some companies feel that specialized consultants are well-positioned to translate international guidance to the local market and nuances.
  - › *Credibility:* Some companies mentioned that third parties bring objectivity and an external perspective that may be considered more compelling to senior leadership and could be perceived as more credible by external audiences.
  - › *Capacity:* Internal staff may not have the capacity to undertake assessments when needed or in a timely manner. External consultants can take on the work when needed and complete it within a defined timeline.
- **Current methods of assessing impacts to children are often correlated to existing trust and safety processes.** Companies tend to rely on quantitative metrics (e.g., reports, policy violations, and take-downs) to gauge impacts on children more than qualitative rights-based assessments of impacts that engage external stakeholders.

- **Reputational, confidentiality, and liability concerns are barriers to transparency.** Companies report they may face liability, reputational, or confidentiality issues if they publish information on risk to children, or recommendations surfaced via CRIAs or external engagement that they are unable to implement.
- **Lack of clarity on CRIA approaches diminishes interest in conducting them.** Companies appear to struggle with translating international and/or general guidance on CRIAs to local contexts or products and feel ill-equipped to adopt off-the-shelf tools without the guidance of external or third-party consultants or experts.
- **Regulations consume resources within companies.** Several companies noted that they need to respond to regulatory requirements before undertaking voluntary assessments. As risk assessments are now required under certain EU regulations, companies have had to reallocate resources to ensure regulatory compliance. Some companies have noted that this draws resources away from other teams and may result in fewer resources or less capacity to undertake assessments that are not specifically required under law. Smaller companies/organizations specifically highlighted the impact of regulatory requirements on resource constraints. In the future, regulations may compel companies to look at specific issues they would otherwise not have assessed—including specific child rights, such as child addiction (noted specifically in the DSA), or child rights as a broader category.
- **CRIAs can be a “one and done” exercise.** CRIA processes can be lengthy, costly, and require high-level executive sign-off, limiting their scope or the frequency with which they are conducted. Companies that conducted CRIAs mentioned that they do not plan to undertake such a significant assessment on a regular basis unless triggered by a significant change in the business or products.





- **The failure of the United States to ratify the CRC can further hinder the adoption of rights-based frameworks.** The fact that the US has not ratified the CRC means that future US-specific regulation is less likely to adopt a child rights framework that aligns with the CRC. This may reduce incentives for US-based companies to utilize the CRC as a foundation for child rights-related efforts or assessments.
- **There is uncertainty about how to engage children.** Companies expressed a desire to speak with children; however, many mentioned that they were unsure of how to do so effectively. Some companies mentioned child focus groups, youth advisory panels, or surveys, but it is challenging to gather insights relevant to different geographies through these methods.
- **Stakeholder engagement provides companies with useful insights.** Companies that do have the capacity to engage stakeholders talk to a wide range of stakeholders, such as civil society organizations, academics, charities, parents, and others.

### 5.1.2 Regulators, Civil Society, and Academia Insights

Key insights from interviews with stakeholders from governmental agencies and regulatory bodies, civil society, and academia include:

- **Stakeholders feel that companies are doing too little on child rights.** Stakeholders are disappointed that companies rarely undertake comprehensive assessments of impacts to child rights or conduct CRIAs, which would enable a deeper understanding of the full range of risks to children and inform mitigations. Additionally, stakeholders feel that companies overly rely on internal data and do not sufficiently refer to external evidence (such as studies) or insights and perspectives from external experts and rightsholders. They also mentioned that while child protection is important, opportunities to empower children should also be considered.
- **Stakeholders seek more visibility.** Stakeholders from government, investment, and civil society want to better understand the risks and benefits to child rights of the digital environment. Stakeholders expressed a desire for guidance they can leverage to encourage more and higher quality CRIAs by companies.
- **Stakeholders suspect that companies lack understanding of key elements of child rights assessments.** For example, few companies seem to have a deliberate approach to addressing rights in tension, and need to better analyze the context in which child rights may be impacted.

- Stakeholders cite companies’ lack of transparency on CRIAs as a problem.** It is difficult for stakeholder to assess company practices related to child rights because companies rarely disclose what they are doing on these issues. It is important for these stakeholders to have visibility into company practices and assessments to develop their own policy, programmatic, and advocacy priorities.
- Investors want to see CRIA findings and monitor the efficacy of mitigations over time.** Investors and shareholders are aware that impacts on child rights online create material risks for companies. Some are also compelled by ethical reasons to take a proactive posture toward protecting children online. As such, investors increasingly use shareholder resolutions and board pressure to compel companies to conduct a CRIA as part of risk mitigation or deal due diligence.
- Stakeholders recognize that CRIAs take resources, which companies do not always have.** Some companies may only have capacity to integrate a child rights component into their HRIA practices, rather than conducting full stand-alone CRIAs. There are numerous situations where a dedicated CRIA process is appropriate, including where HRIAs conducted flag a need for a more thorough analysis on child rights specifically.
- Stakeholders acknowledge that best practice may be incompatible with companies’ business practices.** Stakeholders recognize that companies have business incentives that may be in tension with child protection. For example, incentives to maximize teen users’ time spent online may adversely impact their sleep habits and recommender systems for children may prioritize viral content over age-appropriate content. CRIAs may surface those tensions, and call companies’ business models into question.
- Stakeholders feel that new regulations are a game-changer.** Stakeholders note that regulations are a primary motivator for companies to assess their impacts. For example, the DSA and the AI Act are strongly rooted in human rights, and stakeholders hope to be able to demonstrate how conducting CRIAs contributes to regulatory compliance. Some regulations, notably the DSA, are on track to be imitated in other parts of the world, such as Brazil, Chile, and India.
- There is a concern that regulations will force companies to move toward a “compliance checklist” approach rather than a “child rights or human rights-based approach.”** However, these could be complementary if companies harmonize processes.
- Progress matters more than perfection.** Stakeholders recognize that assessing impacts on child rights is an iterative process where everyone



learns along the way. Anything companies do to identify the risks that they pose is valuable.

- **The scoping of the CRIA is critical.** CRIsAs can be company-wide, but stakeholders feel that project, product, or country-specific due diligence can be more insightful in some cases, particularly because global companies need to be able to account for specific geographical or product contexts.
- **It is important to identify the right stakeholders.** Stakeholders consistently emphasize that children and experts, both internal and external, should be engaged early on and throughout the assessment process.
- **Child protection is a key issue, but empowerment and participation are also important.** Stakeholders see the value of using technology to ensure safe experiences for children, but there are also ways to inform young users on measures they can take by themselves to be safe online. Furthermore, the broader range of child rights, including freedom of expression, access to culture, and the right to be consulted in matters affecting them should be considered.
- **Collaboration between different functions within a company can ensure effective assessments and mitigations.** Stakeholders suggest CRIsAs should be carried out by the ecosystem of actors within a company and not simply sit within the compliance function, where they risk becoming a “tick-box exercise.” Currently, CRIA efforts might sit within a range of functions across a company, and it can be difficult to know who to develop a tool for, given these variations.

## 5.2 Review of Available CRIAs

This section presents the key findings from BSR's analysis of published and unpublished CRIAs undertaken by companies operating in the digital environment, or who acknowledge the role the digital environment plays in their operations. An English language web search was used to identify CRIAs. The search revealed many CRIAs conducted by public agencies, and a small number conducted by companies. The published CRIAs conducted by companies all included some degree of analysis about the role the digital environment plays in child rights risks and opportunities. BSR found the level of nuance with which the digital environment was explored to be correlated to the year the assessment was conducted and the degree of proximity to online services and social networks. However, these observations are limited by the reality that many published CRIAs were summaries rather than full reports.

CRIAs conducted by public agencies were excluded because they are not explicit to the digital environment and are substantively distinct from business CRIAs. Some government-conducted CRIAs are tangentially related to the digital environment, such as Scotland's Commissioner for Children & Youth [CRIA on COVID-19 policies](#), but even then, the impacts of the digital environment are minimally explored. For example, the CRIA acknowledges that a pandemic-driven shelter-in-place ordinance may have increased children's "screen time," but it does not assess how that change created new impacts on children's rights. New regulations that require technology companies to conduct risk assessments of their platforms and produce reports may change the way governments consider the digital environment in their CRIA, but at present, published CRIAs in relation to the digital environment are commissioned and/or conducted by companies.

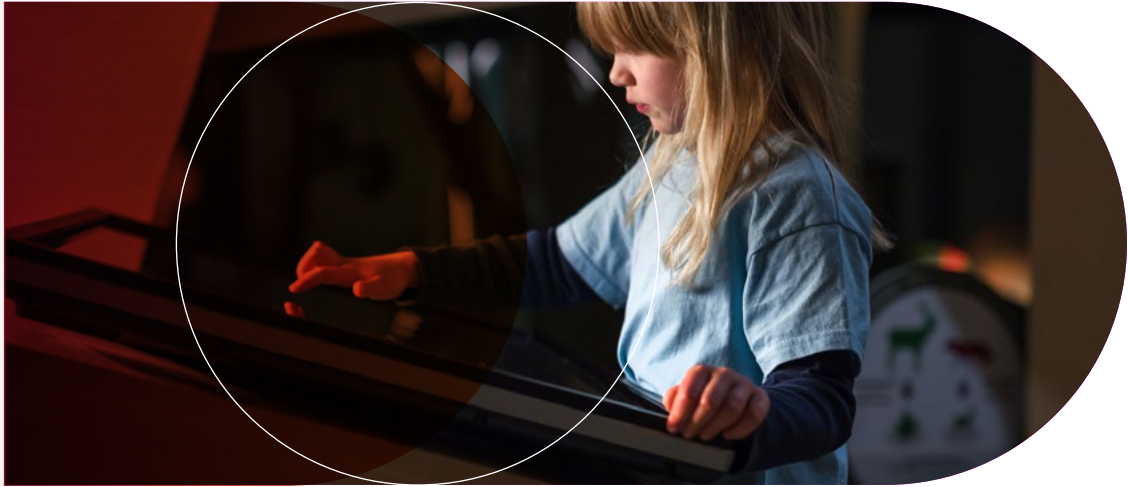
To identify common themes across the CRIAs conducted by companies, BSR evaluated the following:

- scope of the assessment (e.g., product, platform-wide, geography/market)
- trigger (i.e., what prompted the company to conduct a CRIA)
- involvement of consultants (i.e., whether they did it alone or hired consultants to conduct or support the CRIA)
- human rights framework(s) referenced
- mention of opportunities to realize children's rights
- consideration of indirect adverse impacts on children's rights
- incorporation of children's perspectives into the CRIA

The following high-level themes are key findings from the review of CRIAs and build upon and enhance insights from interviews with stakeholders:

- **Lack of public CRIAs makes it challenging for stakeholders to assess company progress.** Of the four public CRIAs, one company published a full report of their CRIA, while others published summaries of their findings. BSR acknowledges that companies may have very good reasons not to publish the whole assessment (e.g., stakeholder safety, commercial confidentiality, withholding information from motivated adversaries), but companies should still seek to publish enough to be effectively judged.<sup>65</sup> The lack of full-length public CRIAs makes it difficult to assess company practices and collaborate to provide insights that would strengthen CRIA practices across the digital environment. The number of CRIAs published by telecommunications companies may suggest that when one company publishes its CRIA, others are more likely to do the same. Many technology companies do not publish their full assessment because they would prefer to advance the findings behind the scenes, rather than be drawn into public debate and scrutiny.
- **Companies often commission consultants to conduct their CRIAs.** Of the eight CRIAs reviewed, seven utilized consultants to conduct the assessment and one used a consultant to review assessment findings. The prevalence of consultant involvement and/or leadership in the CRIA process aligns with interview feedback.
- **CRIAs are a recent practice.** Seven of the eight CRIAs were conducted in the past four years, suggesting that it is currently a niche but growing practice
- **Within the technology industry, telecommunications companies conduct more CRIAs than other industry actors and exercise more transparency in publishing a summary of findings.** There is little information available about CRIA practices in other parts of the

65 UNGP 21 states, "In order to account for how they address their human rights impacts, business enterprises should be prepared to communicate this externally, particularly when concerns are raised by or on behalf of affected stakeholders. Business enterprises whose operations or operating contexts pose risks of severe human rights impacts should report formally on how they address them. In all instances, communications should: (a) Be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences; (b) Provide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved; (c) In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality."



technology sector, and while other technology companies recognize their impacts on children’s rights, they rarely disclose having conducted a CRIA. Interviews and case studies attest to how instrumental the MO-CRIA tool was in compelling telecommunications companies to conduct CRIAs, and this confirms the positive impact that a sector-specific or modular tool can have. In addition, stakeholders perceived that child rights risks are lower for telecommunications companies compared to social media companies, making it easier for them to publish findings.

- **CRIA approaches differ and are often customized by or for the entity being assessed.** Besides the MO-CRIA tool, most companies did not credit a specific tool with guiding their CRIA approach. The companies who conducted CRIAs reported undertaking assessments in collaboration with external organizations that designed bespoke approaches for them. For example, when Article One conducted a CRIA for Wikimedia, it led all activities except for the direct stakeholder engagement because it was important to Wikimedia that it manage that element of the process itself.
- **Companies’ decisions to conduct CRIAs are driven by various factors.** These include the identification of child rights issues in other company assessments, such as HRIAs; pressure from investors or other powerful stakeholders, such as parents and special interest groups; the launch of a new product or service with expected high levels of child users; a notable increase in the number of children adopting or using a product or service; regulatory pressures or requirements; and recent negative press or scandals.
- **Most CRIAs were based on the same standards.** The CRC (an international human rights instrument), and the CRBPs and UNGPs (guidelines for business) appeared as the foundational framework or standard for CRIAs. The methodology for CRIAs also appeared similar as reported and included desktop research, document review, and internal and external stakeholder interviews.
- **CRIAs in relation to the digital environment acknowledge indirect impacts.** Seven of the eight CRIAs evaluated acknowledged that an action the company may take can create adverse impacts in another part of the technology ecosystem, though the comprehensiveness of these statements varied widely. Discussion of the indirect impacts that may occur upstream or downstream is notable because it was not a prompt in any of the published CRIA tools.
- **Consulting child rights experts is more common than directly engaging children.** Only one public CRIA (Wikimedia Foundation) included direct engagement with children via interviews, focus groups, and a survey. Other CRIAs referenced indirect consultation with children from prior engagements and/or via child rights advocates and experts.

- **There is a trend to focus on the most salient rights impacted in the digital environment.** Across all CRIAs, the following rights were consistently found to be at risk of adverse impacts. This list can provide an indication of the most salient human rights impacts for CRIAs to focus on. However, as a matter of best practice, it is essential that impacts across all rights are considered because using a focused list may result in important or “new” impacts being missed:
  - › Right to Equality and Non-Discrimination (CRC 2)
  - › Best Interests of the Child (CRC 3)
  - › Right to Be Heard (CRC 12)
  - › Right to Privacy (CRC 16)
  - › Right to Protection from Violence, Abuse, Injury or Exploitation
  - › Right to Education (CRC 28)
  - › Protection from Economic Exploitation
  - › Right to Protection from Sexual Exploitation and Abuse

Beyond these most common impacts there was variation in the other rights mentioned, including a child’s right to an adequate standard of living, access to culture, and access to remedy. This affirms the value of having companies consider all child rights and identifying their own priority issues through a saliency analysis, rather than being told what rights are most likely to be most salient based on their industry.

### 5.3 Review of Available HRIAs

In addition to CRIAs, BSR reviewed 15 published HRIAs (see Appendix A) and 20 non-published HRIAs or HRAs that consider the digital environment. All these HRIAs were written in English and discoverable through a web search, except for the unpublished assessments on BSR servers.<sup>66</sup> The analysis of HRIAs was based on published HRIA reports and summaries and complete, non-published assessments conducted by BSR. Of those reviewed, the majority were undertaken by technology companies. A subset was undertaken by “non-technology” companies in the consumer goods, beauty, and food sectors that increasingly recognize their connection to the adverse impacts of the digital environment on human and child rights.

The following high-level themes are key findings from the review of HRIAs and interviews with stakeholders:

- **There is wide variation in how HRIAs address impacts to children.** The extent to which impacts on children are discussed in HRIAs range from not at all to significant acknowledgement and assessment of

<sup>66</sup> Naming conventions may differ slightly across the field but generally, Human Rights Assessment (HRA) methodology is different than Human Rights Impact Assessment (HRIA) methodology in that the former does not always include external stakeholder engagement.

impacts. Three HRIAs did not mention children at all (“none”); three HRIAs mentioned children in passing (e.g., as a vulnerable group) but not in detailed relation to unique impacts on their rights (“minimal”); four HRIAs acknowledged an impact on (some) child rights but do not provide detail (“moderate”); and four HRIAs thoroughly assessed impacts on children through details on specific impacts and how they could manifest (“significant”).

- **HRIAs and HRAs are more common than CRIAs.** Companies are more likely to conduct HRIAs because there is more stakeholder pressure for them than there is for CRIAs, and because it is possible to incorporate considerations of children into HRIAs.
- **As with CRIAs, companies typically engage external consultants to conduct human rights assessments.** More mature companies may conduct assessments internally, or commission a consultant to conduct a company-wide or product specific HRIA. In some cases, these HRIAs flag the need for an assessment explicitly focused on child rights. For instance, Wikimedia’s CRIA was driven by a 2020 HRIA that “identified risks to children’s rights as one of five categories of significant human rights risks facing the Foundation and Wikimedia communities.”<sup>67</sup>
- **The methodology for HRIAs is similar to CRIAs.** The methodology referenced in HRIAs aligns closely with CRIA methodologies because both are based on the UNGPs. Both processes emphasize the importance of engaging with stakeholders. Concrete guidance that provides a HRIA methodology is available from BSR,<sup>68</sup> the Danish Institute for Human Rights,<sup>69</sup> and Oxfam.<sup>70</sup>
- **The consideration of impacts to children in HRIAs varies across sectors.** Some industry participants identify children as a subset of rights-holders to be considered, while others identify child rights impacts as part of vulnerable population considerations. Telecommunications, social media, and most major technology companies were more likely to recognize the direct and indirect impacts on children from their operations and services as direct users and indirectly, as children living in an increasingly technological world. In contrast, hardware and software companies tended to only mention children as a vulnerable group, or in the context of child labor in the supply chain.
- **Non-technology sector companies increasingly recognize their connection to the adverse impacts of the digital environment.** Four of the assessments reviewed were conducted for companies outside of the technology sector. They identified impacts to children as a result of their activities in the digital environment, including online marketing or children’s rights in the metaverse. Most of these were conducted in recent

67 Wikimedia Foundation, [Assessing the Child Rights Impacts of Wikimedia Free Knowledge Projects](#), 2023.

68 BSR, [Human Rights Assessments: Identifying Risks, Informing Strategy](#), 9 December 2021.

69 Danish Institute for Human Rights, [Human rights impact assessment guidance and toolbox](#), 25 August 2020.

70 Oxfam, [Human Rights Impact Assessment Framework](#), 26 May 2023.



years, indicating that non-technology sector companies are increasingly aware of the need to consider children’s rights in the digital environment.

- **Children are often treated as a single category within HRIAs.** Companies have very different legal frameworks that govern how they treat children under 13 and teenagers, yet when HRIAs do consider children, impacts are rarely segmented according to age groups—nor by vulnerability, developmental capacity, or the intersectionality of different kinds of vulnerabilities. Only two assessments out of 14 considered impact variations between children of different age (e.g. ages 4-8; 9-12; 13-15; and 16-17).
- **HRIAs often do not assess how a company is currently managing its impact on children.** HRIAs that identify impacts to children’s rights as a specific issue often do not make any specific recommendations for companies to address those impacts. Although 20 assessments mentioned children (either as a vulnerable group or through specific impacts identified), only 10 defined appropriate actions specific to children.
- **The scope of the HRIA may influence the level of consideration of impacts to children.** For example, country or market human rights assessments typically focused on a narrower set of salient rights—notably political and security rights—and rarely referenced impacts to child rights, or children as a vulnerable population. Only one market-specific assessment mentioned child rights, but impacts were not expanded upon because they were not considered a “conflict exacerbating risk.”

Although explicit consideration of child rights does not happen in all HRIAs or HRAs, references to child rights impacts have increased in HRAs conducted in recent years. This change suggests that companies’ attention to their impacts on children is growing, and highlights the utility of CRIA guidance that can complement HRIA/HRAs.

# 6. The Evolving Regulatory Environment

A growing number of governments and regulators have established legal and regulatory instruments that require companies that provide online or digital services to consider risks to children.

While the EU, UK, and Australia have gained significant attention for innovative regulations, new proposals are emerging elsewhere too, such as Brazil's PL-2630 bill, which adapts a similar approach to the DSA to address misinformation, hate speech, and bullying. As the global regulatory landscape continues to evolve rapidly, it is likely that further regulations requiring a rights-based risk-assessment will be introduced.<sup>71</sup>

BSR chose the following six regulations to evaluate for child rights-related trends, based on the number of companies engaged in the digital environment that they impact:

1. [Australian Online Safety Act \(Australia OSA\)](#) (and the Basic Online Safety Expectations)
2. [California Age-Appropriate Design Code Act](#), (California Design Code)
3. [EU Corporate Sustainability Reporting Directive \(CSRD\)](#)
4. [EU Digital Services Act \(DSA\)](#)
5. [The UK Age-Appropriate Design Code \(UK Design Code\)](#)
6. [UK Online Safety Act \(UK OSA\)](#)

## Trends observed include the following:

- **Regulations consistently incorporate considerations of child rights, however some of the considerations are limited to specific rights, such as privacy, and may only require limited assessments.** For example, the UK Age-Appropriate Design Code and California Age-Appropriate Design Code Act require the conduct of data protection impact assessments that are limited to the consideration of risks to children's personal data arising from the collection, use,

<sup>71</sup> Insights from stakeholder interview with Latin America digital policy expert.

or processing by companies. However, despite not being centered on the full framework of child rights, the regulations play key roles in formalizing and mandating the consideration of specific rights or the international child and human rights framework by companies conducting risk or impact assessments.

- **Regulations. ... vary in the scope of issues to be considered vary in the scope of issues to be considered.** Regulations such as the DSA, UK OSA, and the CSRD require systemic or human rights risk assessments that include considerations of a broad range of child rights. Regulations such as the UK and California design codes require companies to conduct impact assessments that are limited to the collection, processing, and use of children’s data in terms of child rights considerations.
- **Regulatory requirements and the risk assessment methodologies included in them typically require companies to consider risks to people rather than the business, the severity of the risks identified, and to conduct stakeholder engagement.** Stakeholder engagement can be conducted directly with affected populations or rights holders or through appropriate representatives or experts. Companies are also expected to establish and implement mitigation measures to address the risks identified. The defining feature is that they all require an assessment of risks to people (including children) rather than an assessment of risks to the business, and this is a big shift in the regulatory environment.

### Key Takeaways:

- **One impact of these regulatory requirements has been for companies to seek to align or harmonize risk assessment methodologies to meet regulatory requirements.** This may provide an opportunity for child rights considerations to be incorporated across risk assessment and due diligence processes required by law. However, this focus on regulatory compliance may also result in a “narrow approach” to due diligence processes that may lead to fewer voluntary CRIAs being conducted.
- **Regulatory provisions may also dampen the number of CRIAs and HRIAs that are published or externally communicated for a variety of reasons.** First, requirements for publication under regulations such as the DSA and CSRD may impact and change the nature of CRIA publications. For instance, companies may seek to tailor their transparency efforts in line with regulatory requirements and refrain from externalizing detailed risk assessments. Second, the increase in regulatory scrutiny and potential liability may decrease companies’ appetites to proactively share with external audiences any actual or potential risks to children arising from

their products or services that the companies may identify. It remains to be seen whether regulation will result in fewer CRIAs published by companies, or whether regulation will result in more information assessing impacts on children being disclosed as part of regulatory compliance efforts, even if it is not published in the form of a CIA.

- **Companies may begin to consolidate internal human rights and compliance processes and bring various teams and business functions into alignment by creating one assessment process that covers all mandated and voluntary risk assessments.** Within this climate, companies with resources dedicated to child rights issues may have an opportunity to embed broad child rights considerations into the risk assessment process and ensure that teams developing and/or deploying new products, services, or features consider and protect the best interests of the child before product launch. As such, any new guidance or tool to assess child rights that requires extensive additional “stand-alone” resource dedication or that cannot be incorporated into emerging regulatory risk assessment processes may not be so widely adopted by relevant companies.

# 7. Conclusion

The digital environment creates opportunities for and impacts on children’s rights that will evolve with time. Companies need robust assessment frameworks that can keep pace with rapidly evolving technologies and their impacts. However, current approaches have significant gaps in relation to the digital environment and they do not account for the different types of risks that can manifest on various platforms. As the digital landscape continues to evolve, there is a clear need for updated CRIA guidance that can bridge these gaps while remaining practical and accessible for companies of varying sizes and capacities. Such guidance must balance comprehensive rights assessment with operational feasibility, and provide clear frameworks for engaging with children, addressing the impacts of emerging technologies, and navigating competing rights.

The development of UNICEF’s latest CRIA Tool represents a significant step toward meeting these needs and supporting more systematic consideration of child rights across the technology ecosystem. UNICEF will launch the tool in early 2025 and, together with BSR, raise awareness of it, and train companies on its implementation.

# Appendix A: Published HRIAs and CRIAs

Public Human Rights Impact Assessments reviewed by project team:

#	Company	Year
1	<a href="#">Ericsson</a>	2021
2	<a href="#">GIFCT</a>	2021
3	Intel	2016
4	Meta	2018
5	Meta	2018
6	<a href="#">Meta</a>	2020
7	<a href="#">Meta</a>	2022
8	<a href="#">Microsoft</a>	2023
9	Millicom	2020
10	<a href="#">Rakuten</a>	Unspecified
11	<a href="#">SaaS sector</a>	2022
12	<a href="#">Tech Coalition</a>	2023
13	<a href="#">Telefonica</a>	2013
14	<a href="#">Twitch</a>	2023
15	<a href="#">Western Digital</a>	2021

Public Child Rights Impact Assessments reviewed by project team:

#	Company	Year
1	<a href="#">Millicom</a>	2016
2	<a href="#">Telia</a>	2022
3	<a href="#">Verizon</a>	2022
4	<a href="#">Wikimedia Foundation</a>	2022

# Appendix B: Project Resource Directory

Resource Name	Author	Publication Year
<a href="#"><u>Digital Childhood (2023 update)</u></a>	5Rights Foundation	2023
<a href="#"><u>Child Rights Impact Assessment: A tool to Realise Children’s Rights in the Digital Environment</u></a>	5Rights Foundation & Digital Futures Commission	2021
<a href="#"><u>Transparency Initiatives Portal</u></a>	Action Coalition on Meaningful Transparency	
<a href="#"><u>Study on Children’s Rights and Business in Africa</u></a>	African Committee of Experts on the Rights and Welfare of the Child	2023
<a href="#"><u>Vulnerable Offline and at Risk Online: Tackling Children's Safety</u></a>	Aiman El Asam, Adrienne Katz	2019
<a href="#"><u>Australia Safety by Design principles</u></a>	Australia eSafety Commissioner	2018
<a href="#"><u>eSafety AU Safety by Design guides</u></a>	Australian eSafety Commissioner	
<a href="#"><u>Why Children Are Unsafe in Cyberspace</u></a>	BCG	2022
<a href="#"><u>Child Online Safety: Minimizing the Risk of Violence, Abuse and Exploitation Online</u></a>	Broadband Commission for Sustainable Development, ITU, UNESCO	2019
<a href="#"><u>Twitch Human Rights Impact Assessment</u></a>	BSR	2023
<a href="#"><u>Telia Human Rights Impact Assessment</u></a>	BSR	2017
<a href="#"><u>Tech Coalition Human Rights Impact Assessment of the Lantern Program</u></a>	BSR	2023
<a href="#"><u>Human Rights Impact Assessment of the Software-as-a-Service sector</u></a>	BSR	2022
<a href="#"><u>A Human Rights Impact Assessment of the Global Internet Forum to Counter Terrorism</u></a>	BSR	2021
<a href="#"><u>Human Rights Impact Assessment of Facebook in Cambodia</u></a>	BSR	2019
<a href="#"><u>Google’s Human Rights by Design</u></a>	BSR	2019
<a href="#"><u>Access to Remedy</u></a>	BSR	2021
<a href="#"><u>Human Rights Impact Assessment: Meta’s Expansion of End-to-End Encryption</u></a>	BSR	2022
<a href="#"><u>Across the Stack Tool</u></a>	BSR & Global Network Initiative	

<u>Conflict-Sensitive Human Rights Due Diligence for ICT Companies</u>	BSR & JPL	2022
<u>Taking a Child Rights-Based Approach to Implementing the UNGPs in the Digital Environment (draft for consultation)</u>	B-Tech & UNICEF	2024
<u>Amazon Saved Children’s Voices Recorded by Alexa Even After Parents Asked for It to Be Deleted. Now It’s Paying a US\$25 Million Fine.</u>	Business Insider	2023
<u>CRIA Template</u>	Canadian government	2023
<u>Age-Appropriate Digital Services Framework</u>	CEN-CENELEC	2023
<u>Online and Observed—Student Privacy Implications of School-Issued Devices and Student Activity Monitoring Software</u>	Center for Democracy and Technology	2021
<u>Online and Observed—Student Privacy Implications of School Issued Devices and Student Activity Monitoring Software</u>	Center for Democracy and Technology	2021
<u>CRIA Self-Assessment Tool</u>	Children’s Commissioner of Wales	2022
<u>The 4Cs: Classifying Online Risk to Children</u>	Children Online: Research and Evidence	2021
<u>Social Contagion of Cyberbullying via Online Perpetrator and Victim Networks</u>	Computers in Human Behavior	2021
<u>Handbook for Policy Makers on the Rights of the Child in the Digital Environment</u>	Council of Europe	2020
<u>Guidelines to Respect, Protect and Fulfil the Rights of a Child in the Digital Environment</u>	Council of Europe	2018
<u>Two Clicks Forward and One Click Back: Report on Children with Disabilities in the Digital Environment</u>	Council of Europe	2019
<u>Children’s Data Protection in an Education Setting Guidelines</u>	Council of Europe	2020
<u>Handbook for Policymakers on the Rights of the Child in the Digital Environment</u>	Council of Europe	2019
<u>General Comment No. 5 (2003) on General Measures of Implementation of the Convention on the Rights of the Child</u>	CRC	2003
<u>General Comment No. 25 (2021) on Children’s Rights in Relation to the Digital Environment</u>	CRC	2021
<u>Designing for Children’s Rights</u>	D4CR	2022
<u>The Unseen Teen: The Challenge of Building Healthy Tech for Young People</u>	Data & Society	2021
<u>Child Rights by Design: Guidance for Innovators and Designers of Products and Services Used by Children</u>	Digital Futures Commission	2023
<u>Child Rights Impact Assessment</u>	Digital Futures Commission	2021
<u>Age Assurance—Guiding Principles and Best Practices</u>	Digital Trust & Safety Partnership	2023



	<a href="#">Child Online Safety Index</a>	DQ Institute	2023
1	<a href="#">The Child’s Right to Protection Against Economic Exploitation in the Digital World (submission to the CRC)</a>	Dr. Eva Lievens, Dr. Simone van der Hof, Dr. Ton Liefwaard, Dr. Valerie Verdoodt, Ingrida Milkaite, Thijs Hannema	2023
2	<a href="#">Privacy First: A Better Way to Address Online Harms</a>	EFF	2019
3	<a href="#">A Guide on How to Carry Out CRIA</a>	ENOC	2023
4	<a href="#">AI and the Rights of the Child</a>	European Union (EU)	Unknown
5	<a href="#">Child Rights Toolkit: Integrating Child Rights in Development Cooperation</a>	EU & UNICEF	2022
6	<a href="#">EU Kids Online 2020: Survey Results From 19 Countries</a>	EU Kids Online	2014
7	<a href="#">Common Framework of Reference on Child Rights Impact Assessment: A Guide on How to Carry Out CRIA</a>	European Network of Ombudspersons for Children	2020
	<a href="#">Digital Services Act</a>	European Union (EU)	2020
	<a href="#">Corporate Sustainability Due Diligence Directive (CSDDD)</a>	European Union (EU)	2022
	<a href="#">Corporate Sustainability Reporting Directive (CSRD)</a>	European Union (EU)	2023
	<a href="#">Tech Giants Make ‘Voluntary’ Pledge To Develop Responsible AI—Including OpenAI and Google—White House Says</a>	Forbes	2022
	<a href="#">Teens Spend Average of 4.8 Hours on Social Media per Day</a>	Gallup	2023
	<a href="#">Effective Downstream Human Rights Due Diligence: Key Questions for Companies</a>	GBI	2023
	<a href="#">Online Sexual Exploitation and Abuse: New Findings</a>	Global Kids Online	2023
	<a href="#">EU Kids Online Report</a>	Global Kids Online	2020
	<a href="#">The GNI Principles at Work</a>	Global Network Initiative	
	<a href="#">Online Safety Act</a>	Government of Australia	2020
	<a href="#">The California Age-Appropriate Design Code Act</a>	Government of California	2021
	<a href="#">Child Rights Impact Assessment Tool</a>	Government of Canada	2022
	<a href="#">Children’s Rights and Well-Being Screening Sheet and Impact Assessment (CRWIA)</a>	Government of Scotland	2023
	<a href="#">Children’s Rights and Well-Being Impact Assessment (CRWIA)</a>	Government of Scotland	2021
	<a href="#">Child Rights Impact Assessment Legislation</a>	Government of Wales	2019
	<a href="#">ICO’s Children’s Code Risk Assessment Tool</a>	ICO	2018
	<a href="#">Standard for an Age Appropriate Digital Services Framework Based on the 5Rights Principles for Children</a>	IEEE	2023

<a href="#"><u>Integrity Institute Transparency Best Practices</u></a>	Integrity Institute	2021
<a href="#"><u>Integrity Institute Algorithmic Recommendations Transparency</u></a>	Integrity Institute	2023
<a href="#"><u>Verizon Shareholders Show Strong Support for Increased Efforts to Protect Children from Sexual Exploitation Online</u></a>	Interfaith Centre on Corporate Responsibility	
<a href="#"><u>Refuge and Risk—Life Online for Vulnerable Young People</u></a>	Internet Matters	2019
<a href="#"><u>Refuge and Risk Report</u></a>	Internet Matters	2021
<a href="#"><u>Children Front and Centre: Fundamentals for a Child-Oriented Approach to Data Processing</u></a>	Ireland Commissioner for Data Protection	2021
<a href="#"><u>Guidelines for Policymakers on Child Online Protection</u></a>	ITU	2021
<a href="#"><u>Guidelines for Industry on Child Online Protection</u></a>	ITU & UNICEF	2020
<a href="#"><u>Bullying Victimization and Perpetration: Some Answers and More Questions</u></a>	Jornal de Pediatria	2021
<a href="#"><u>Leiden CRIA ‘Fill-in Document’</u></a>	Leiden University	2023
<a href="#"><u>Dutch Code for Children’s Rights</u></a>	Leiden University	2023
<a href="#"><u>Child Rights Impact Assessment (CRIA): A Review of Comparative Practice Across the UK</u></a>	Lisa Payne	2021
<a href="#"><u>Child Rights Impact Assessment as a Policy Improvement Tool</u></a>	Lisa Payne	2019
<a href="#"><u>Fundamental Rights and Algorithm Impact Assessment (FRAIA)</u></a>	Netherlands government	2022
<a href="#"><u>Evidence Review on Online Risks to Children</u></a>	NSPCC Learning	2023
<a href="#"><u>Involving Children in Child Rights Impact Assessment (CRIA) and Child Rights Impact Evaluation (CRIE)</u></a>	Observatory of Children's Human Rights Scotland	2022
<a href="#"><u>What Is Child Vulnerability and How Can It Be Overcome?</u></a>	OECD	2019
<a href="#"><u>Children in the Digital Environment— Revised Typology of Risks</u></a>	OECD	2021
<a href="#"><u>Recommendation of the Council on Children in the Digital Environment</u></a>	OECD	2021
<a href="#"><u>OECD Due Diligence Guidance for Responsible Business Conduct</u></a>	OECD	2018
<a href="#"><u>OECD Guidelines for Multinational Enterprises on Responsible Business Conduct</u></a>	OECD	2023
<a href="#"><u>Transparency Reporting on Child Sexual Exploitation and Abuse Online</u></a>	OECD	2023
<a href="#"><u>Protecting Children Online: An Overview of Recent Developments in Legal Frameworks and Policies</u></a>	OECD	2020
<a href="#"><u>Companion Document to the Recommendation on Children in the Digital Environment</u></a>	OECD	2022

	<a href="#">Combatting COVID-19's effect on children</a>	OECD	2020
1	<a href="#">OECD Guidelines for Digital Service Providers</a>	OECD	2021
2	<a href="#">Introduction to the Committee</a>	OHCHR	
3	<a href="#">Report on the 2nd Session of the Committee on the Rights of the Child</a>	OHCHR	1992
4	<a href="#">Taking Action to Address Human Rights Risks Related to End-Use</a>	OHCHR & B-Tech	2020
5	<a href="#">Human Rights Impact Assessment Framework</a>	Oxfam	2023
6	<a href="#">Proxy Impact: Meta Shareholders to Vote on Resolution Asking Company to Combat Online Child Sexual Exploitation</a>	PR News Wire	2022
7	<a href="#">The Child's Right to Protection against Economic Exploitation in the Digital World</a>	Simone van der Hof	2020
	<a href="#">Parenting in the Digital Age—The Challenges of Parental Responsibility in Comparative Perspective</a>	Sonia Livingstone & Jasmina Byrne	2018
	<a href="#">Some Considerations for CRIAs of Business</a>	Tara M. Collins and Gabrielle Guevara	2014
	<a href="#">Trust: Voluntary Framework for Industry Transparency</a>	Tech Coalition	2022
	<a href="#">Assessing OCSEA Harms in Product Development</a>	Tech Coalition	2023
	<a href="#">Tech Coalition Trust Framework for Transparency reporting</a>	Tech Coalition	
	<a href="#">#CovidUnder19 webpage</a>	Terre des Hommes	2020
	<a href="#">Human Rights Impact Assessment of Digital Activities</a>	The Danish Institute for Human Rights	2020
	<a href="#">Responding to Online Threats: Minors' Perspectives on Disclosing, Reporting, and Blocking</a>	Thorn	2021
	<a href="#">Thorn: Youth Perspectives on Online Safety</a>	Thorn	
	<a href="#">Online Safety Act</a>	UK	2023
	<a href="#">Illegal Migration Bill: Child's Rights Impact Assessment (CRIA)</a>	UK Home Office	2023
	<a href="#">Children's Code Risk Assessment Tool</a>	UK ICO	2023
	<a href="#">Data Protection Impact Assessment (DPIA)</a>	UK ICO	2018
	<a href="#">Age Appropriate Design: a Code of Practice for Online Services</a>	UK Information Commissioner	2020
	<a href="#">UKCIS Evidence Review: Children's Online Activities, Risks and Safety</a>	UKCIS	2017
	<a href="#">Guidance From the Secretary-General—Human Rights Due Diligence for Digital Technology Use</a>	UN	2024
	<a href="#">Universal Declaration of Human Rights</a>	UN General Assembly	1948

	<a href="#"><u>Convention on the Rights of the Child</u></a>	UN General Assembly	1989
1	<a href="#"><u>Declaration of the Rights of the Child</u></a>	UN General Assembly	1959
2	<a href="#"><u>Annual Report of the Special Representative of the Secretary-General on Violence Against Children to the Human Rights Council</u></a>	UN General Assembly	2023
3	<a href="#"><u>UN Guiding Principles on Business and Human Rights</u></a>	UN Human Rights Council	2011
4	<a href="#"><u>Annual Report of the Special Representative of the Secretary-General on Violence Against Children</u></a>	UN Human Rights Council	2023
5	<a href="#"><u>UNGP Brochure</u></a>	UNDP India	2021
6	<a href="#"><u>MO-CRIA: Child Rights Impact Self-Assessment Tool</u></a>	UNICEF	2021
7	<a href="#"><u>Child Online Safety Assessment (COSA) Tool</u></a>	UNICEF	2016
	<a href="#"><u>Children's Online Privacy &amp; Freedom of Expression: Industry Toolkit</u></a>	UNICEF	2018
	<a href="#"><u>Children and Digital Marketing: Industry Toolkit</u></a>	UNICEF	2018
	<a href="#"><u>Child Safeguarding Toolkit for Business</u></a>	UNICEF	2018
	<a href="#"><u>Children Are Everyone's Business Workbook 2.0</u></a>	UNICEF	2013
	<a href="#"><u>Children's Rights in Policies and Codes of Conduct</u></a>	UNICEF	2013
	<a href="#"><u>Children's Rights in Sustainability Reporting</u></a>	UNICEF	2014
	<a href="#"><u>Engaging Stakeholders on Children's Rights: A Tool for Companies</u></a>	UNICEF	2014
	<a href="#"><u>Online Gaming and Children's Rights: Recommendations on Assessing Impact on Children</u></a>	UNICEF	2020
	<a href="#"><u>Policy Guidance on AI for Children</u></a>	UNICEF	2021
	<a href="#"><u>Recommendations for the Online Gaming Industry on Assessing Impact on Children</u></a>	UNICEF	2020
	<a href="#"><u>Legislating for the Digital Age: Global Guide on Improving Legislative Frameworks to Protect Children From Online Sexual Exploitation and Abuse</u></a>	UNICEF	2022
	<a href="#"><u>Discussion Paper: Operational-Level Grievance Mechanisms Fit for Children</u></a>	UNICEF	2019
	<a href="#"><u>The Case for Better Governance of Children's Data: A Manifesto</u></a>	UNICEF	2021
	<a href="#"><u>Children Are Everyone's Business Workbook 2.0</u></a>	UNICEF	2013
	<a href="#"><u>Engaging Stakeholders on Children's Rights</u></a>	UNICEF	2014
	<a href="#"><u>Children's Data Privacy and Protection: Implementation Challenges and Opportunities for Action at a Company Level (internal report)</u></a>	UNICEF	2022

<u>Integrating Child Rights in Development Cooperation (Module 5)</u>	UNICEF & EU	2014
<u>Notice and Takedown: Company Policies and Practices to Remove Online CSAM</u>	UNICEF & GSMA	2016
<u>Children’s Rights in Sustainability Reporting: A Guide for Incorporating Children’s Rights Into GRI-Based Reporting</u>	UNICEF & Save the Children	2014
<u>Children’s Rights in Policies and Codes of Conduct. A Tool for Companies</u>	UNICEF & Save the Children	2013
<u>Children’s Rights in Impact Assessments</u>	UNICEF & the Danish Institute for Human Rights	2013
<u>Children’s Rights and Business Principles</u>	UNICEF & UN Global Compact & Save the Children	2012
<u>Children’s Experiences of Online Sexual Exploitation and Abuse in 12 Countries in Eastern and Southern Africa and Southeast Asia</u>	UNICEF Office of Research—Innocenti	2022
<u>Local Government CRIA Template</u>	UNICEF UK	2021
<u>Children and Teens’ Online Privacy Protection Act</u>	US Congress	2022
<u>The Business and Human Rights Dimension of the Digital Services Act</u>	University of St. Gallen	2023
<u>Protecting Children Online</u>	US Senate Committee on the Judiciary	2024
<u>US Surgeon General Advisory on Youth Mental Health</u>	US Surgeon General	2021
<u>Neely Center Design Guide</u>	USC’s Neely Center	2023
<u>WEF Artificial Intelligence for Children</u>	World Economic Forum	2022
<u>Global Threat Assessment Report 2023</u>	WeProtect Global Alliance	2023



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