



INDUSTRY TOOLKIT ON
CHILDREN'S RIGHTS AND
DIGITAL MARKETING

unicef 
for every child

STEP 3 – ACT

Recommendations for *Ad-tech Providers*

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This document is part of [UNICEF's Industry Toolkit on Children's Rights and Digital Marketing](#), which consists of three steps:

1

Step 1
Understand

Outlines the toolkit's purpose and foundational knowledge on child rights and digital marketing.

2

Step 2
Assess

A self-assessment tool for companies to evaluate their current practices across five child rights due diligence steps.

YOU ARE HERE

3

Step 3
Act

Recommendations for ad-tech providers, with actions outlined for businesses at both 'Foundational' and 'Mature' levels across the five child rights due diligence steps.

Businesses are encouraged to look across the ecosystem and use their leverage to promote respect for children's rights. Additional actor-specific guides are available for platforms, agencies, and brands. Each guide includes recommendations tailored to the unique context of the actor category. Businesses may play multiple roles across the digital marketing ecosystem. As such, exploring the Step 3 – Act guidance for each relevant actor category is encouraged.


Introduction to Step 3 – Act

Ad-tech companies provide the technological infrastructure that enables targeted advertising, data analytics, and automated ad placements. Their control primarily lies in the development and deployment of advertising technologies, including programmatic bidding systems, tracking mechanisms, and audience segmentation tools.

Ad-tech providers wield influence over how ads are delivered, optimized and measured. Their leverage comes from their ability to shape advertising efficiency and effectiveness, often setting industry standards for data usage, attribution models, and algorithmic decision-making. This allows ad-tech providers to define operational norms for advertisers, publishers and intermediaries, influencing practices related to user privacy, content personalization, and monetization strategies.

Important note

All actors in the digital marketing ecosystem bear responsibility for avoiding, preventing, and addressing potential and actual child rights impacts in their operations.

 Please consult [Step 1 - Understand](#) for more detail on corporate responsibility.

The role of ad-tech providers: *Sample scenario*

Company C, an ad-tech provider, uses automated bidding algorithms to place ads across various platforms to optimize bids based on predetermined factors aimed at ensuring cost-efficiency and better targeting. Due to a lack of robust safeguards, content promoting weight loss products intended for adults reaches children.

This **hypothetical scenario** aims to illustrate common practices by ad-tech providers and associated child rights challenges.

This scenario raises several concerns, including but not limited to:




Weak targeting safeguards mean children are served ads meant for adults, creating age-inappropriate advertising environments that risk harming children's well-being.

Without appropriate safeguards, automated ad placements may result in misaligned contexts that may have adverse impacts on children. For this reason, conducting due diligence is vital for preventing and mitigating harmful impacts associated with digital marketing practices.



The delivery of ads to children may involve the collection and processing of their data (such as browsing behavior, interests, and device identifiers). Without safeguards, this can lead to privacy violations, manipulative targeting, and exploitation of children's digital footprints.

For more information on how children can be affected by common digital marketing practices,  please refer to [Step 1 - Understand](#).



Even if contextual advertising techniques were used, children may still be exposed to the harmful weight loss ads if content classification and child-specific safeguards are inadequate.

1

Recommendations for ad-tech providers

In alignment with the United Nations Guiding Principles on Business and Human Rights, **the child rights due diligence process entails five crucial steps from policy commitment to remediation** (👁️ see [Step 1 – Understand](#) for more detail).

The tables below outline recommendations for ad-tech providers addressing each of these five due diligence steps at both 'Foundational' and 'Mature' levels. The purpose of the two levels is to support companies to prioritize the broad range of possible actions at every step.

For each step, companies that received a 'Foundational' score in Step 2 – Assess should begin by considering actions recommended in the 'Foundational' column. Likewise, companies at a 'Mature' level should consider actions in the 'Mature' column for each respective step.

When considering implementing the 'Mature' level recommendation, always confirm that the 'Foundational' recommendation has been met first. Likewise, all companies that meet a 'Foundational' level recommendation are invited to consider the matching 'Mature' level recommendation across all steps.

Each table below is followed by top tips that may be valuable in acting on the recommendations, along with links where companies can find further support for their implementation journey.



A

Setting Policy Commitments

Policies set the foundation for a company's commitment to respect child rights. They communicate clear expectations internally and externally, provide a framework for action, enable accountability, and influence existing and potential business relationships.



ACTION



RECOMMENDATION



Foundational



Mature

▶ Set a policy commitment

Child rights policies highlight a company's proactive commitment to respect child rights. They clarify corporate values internally and externally, and signal responsible business practices. They can be stand-alone policies or integrated into broader policies (e.g., human rights policies) and should be publicly disclosed. They should serve as integral guidance for other commitments such as terms and conditions and privacy policies.

Highlight company commitments to respect children's rights and safety throughout the value chain and business relationships. These may be standalone commitments or be integrated into broader policy or human rights commitments. Include an understanding of children as anyone under age 18, in alignment with the Convention on the Rights of the Child, and ensure the policy is sanctioned at the highest levels of the company.

Based on the established policy commitment to respect child rights, *develop a specific, stand-alone policy and/or code of conduct for marketing and children* that is easily accessible to diverse stakeholders and is regularly reviewed internally.

▶ Consider children's evolving capacities

Children's abilities change as they grow older. Respecting children's evolving capacities in the context of policy commitments means that policies reflect appropriate protections and opportunities tailored to different age groups.

Age brackets commonly used by tech companies and supported by research on the stages of child development are: 0-5, 6-9, 10-12, 13-15 and 16-17.

Acknowledge children's evolving capacities and include special protections for all children within your child rights commitments. It is important to remember that older children or teenagers also require special protections.

Within the child rights policy, build on the understanding of evolving capacities and *include commitments to empower and support children* with measures tailored to different age groups.

▶ Acknowledge vulnerability and inclusion

Socioeconomic disadvantages, disability, gender, lack of digital literacy, and many other factors can amplify the risks that digital marketing poses to children, making them more susceptible to manipulative design tactics, harmful content and privacy breaches. Understanding and addressing vulnerability within policy commitments is an important step to ensuring non-discrimination and inclusion.

Introduce specific acknowledgement and commitments relating to the needs of children in disadvantaged or vulnerable situations within policy commitments. Vulnerability here is linked with access to the means or resilience to manage online risks effectively (e.g. economic or social resources).

Promote inclusion by supporting positive gender socialization, acknowledging geographical divides and dismantling stereotypes in algorithmic design.

See UNICEF's [Promoting Diversity and Inclusion in Advertising: A UNICEF playbook](#) for further guidance.

<p>▶ Ensure accessibility</p>	<p><i>Ensure relevant company policies are easily available</i> and presented in language that is accessible to brands and agencies deploying the ad-tech.</p>	<p><i>Explain how your company's policies on children translate into the development and deployment of ad-tech you provide.</i></p>
<p>Accessible company policies increase transparency and strengthen consumer trust. Children and their parents or caregivers should be able to find and understand corporate policies related to digital marketing.</p>	<p>Provide examples of how children are considered in targeting practices, bid parameters, audience segmentation, and AI-powered ad creatives as relevant.</p>	<p>Provide examples of how children are considered in targeting practices, bid parameters, audience segmentation, and AI-powered ad creatives as relevant.</p>
<p>▶ Embed child rights commitments in business relationships</p>	<p><i>Ensure that policy commitments are reflected in contracts or reference materials</i> within new and existing business relationships.</p>	<p><i>Actively engage with clients and business partners</i> on child rights considerations and share your tools and knowledge.</p>
<p>Embedding a company's responsible marketing commitments in contracts – including the responsibility to respect child rights – ensures that third parties uphold the same child rights standards in their operations.</p>	<p>Actively engage with clients and business partners on child rights considerations and share your tools and knowledge.</p>	<p>Actively engage with clients and business partners on child rights considerations and share your tools and knowledge.</p>
<p>▶ Assign responsibility</p>	<p><i>To drive accountability, assign an appropriate individual or team with responsibility for overseeing implementation of your child rights policy commitments within the company.</i> Ensure clear, specific commitments are made by senior management that cascade throughout your business practices.</p>	<p><i>Provide regular child rights training</i> for relevant teams, organized by a qualified individual or function. Include information on findings from impact assessments, complaint mechanisms, and external experts such as civil society and academia.</p>
<p>Dedicating appropriate human and financial resources to implementing child rights commitments ensures employees understand the implications in their work, thus setting the company up to successfully prevent and mitigate potential adverse impacts on children.</p>	<p>To drive accountability, assign an appropriate individual or team with responsibility for overseeing implementation of your child rights policy commitments within the company. Ensure clear, specific commitments are made by senior management that cascade throughout your business practices.</p>	<p>Provide regular child rights training for relevant teams, organized by a qualified individual or function. Include information on findings from impact assessments, complaint mechanisms, and external experts such as civil society and academia.</p>

TOP TIPS



Ensure senior-level buy-in.



Involve legal functions to assist with compliance with relevant regulations.



Involve external child rights experts to help identify gaps in existing commitments and to help determine what new policy commitments to make.



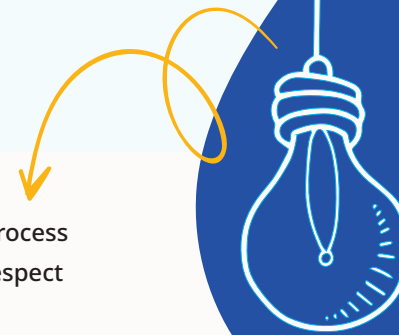
FURTHER RESOURCES AND GUIDANCE

- UNICEF, United Nations Global Compact and Save the Children, [Children's Rights and Business Principles](#) (CRBPs)
- International Telecommunication Union (ITU) and UNICEF, [Child Rights and Business in the Digital Environment: Training for industry](#)
- Norges Bank Investment Management, [Children's Rights Strategy: Expectations towards companies](#)

B

Identifying and assessing impacts

Identifying and assessing impacts allows businesses to understand how their operations and digital marketing practices may impact children's rights. This process helps prioritise risks, prevent harm, and ensure that strategies meaningfully respect and support children's rights.



The **D-CRIA Toolbox** presents further guidance on how to conduct effective child rights impact assessments in relation to the digital environment.



ACTION



RECOMMENDATION



Foundational



Mature

Identify impacts

Harm to children associated with digital marketing may result from at least one of three elements (see [Step 1 – Understand](#), Section 2.1 for further detail).



Content the message and substance of the advertisement itself;



Context not about what children see, but where and when they see it; and



Design how advertisements are structured and delivered.

A comprehensive [D-CRIA](#) offers a focused approach for identifying and assessing all child rights impacts associated with digital business activities and supports the company's regulatory compliance.

Assess how children may be affected by ad tech tools enabling the content, context and design of digital marketing.

Consider impacts as early as possible, from conceptualization to distribution stages. Consider all aspects including the development of data management systems, targeting algorithms, and measurement frameworks.

Use the D-CRIA toolbox to conduct an impact assessment of digital marketing activities. This methodology consists of assessing the scale, scope, remediability and likelihood of impacts.

Establish indicators that may trigger a dedicated or renewed child rights impact assessment, such as entering a new market, shifts in business strategies, or regulatory changes.

Consider children in vulnerable situations

Socioeconomic disadvantages, disability, gender, lack of digital literacy, and many other factors can amplify the risks that digital marketing poses to children, making them more susceptible to manipulative design tactics, harmful content and privacy breaches. Taking these factors into account ensures that marketing practices are sensitive to the varying risks faced by children in different contexts.


Assess how children in vulnerable situations may be impacted by your ad-tech tools and whether certain contexts might increase risks to children.




Assess how bidding and targeting algorithms take these context-related risks into consideration.


Use the D-CRIA toolbox to conduct an impact assessment of your ad-tech tools. The D-CRIA process incorporates considerations for children in vulnerable situations throughout the assessment.




<p>▶ Assess data protection risks</p> <p>Responsible handling of children's data minimizes privacy risks and mitigates risks related to targeting and personalization that could manipulate children.</p>	<p><i>Assess how children's data will be used</i> in the development and use of existing and new ad-tech services as well as AI developed or deployed by your company.</p>	<p><i>Conduct a comprehensive data protection impact assessment</i> that considers the risks to children as a result of data processing practices related to ad-tech tools including the use of data in the context of AI technologies.</p>
<p>▶ Assess risks related to Artificial Intelligence (AI)</p> <p>Use of AI in the creation or deployment of marketing communications can affect the well-being and development of a child by obscuring commercial intent, increasing personalization, and potentially leading to economic exploitation.</p>	<p><i>Assess the impacts on children from the use of AI in ad-tech tools</i> (e.g. targeting practices, data management and measurement tools).</p> <p><i>Investigate whether your company is contributing to or linked with harm as a result of business relationships.</i> For example, consider the impacts and use of AI through platforms that host marketing communications.</p>	<p><i>Investigate how child rights considerations feature in your company's AI governance practices.</i></p> <p><i>Integrate child safety and privacy across the AI life cycle,</i> including every phase of design, development, delivery and decommission.</p> <p>Implement measures to prevent use of AI for behavioral targeting, personalization, emotional recognition of children or manipulative design.</p>
<p>▶ Assess risks related to influencer marketing</p> <p>Influencer marketing means promoting brands, products, and services through individuals with a considerable online presence in exchange for financial or in-kind compensation. This can be particularly persuasive for children. Recognizable faces are also influential, given that children respond strongly to familiar characters from their favorite books, television series or movies, as well as celebrities and sports stars.</p>	<p><i>If using ad-tech to match brands with influencers,</i> assess the risks to children that might be associated with the influencer's audience.</p>	<p><i>If designing tools for influencers (e.g. to improve content style and posting times), assess how such optimization tools may impact children</i> and how this aligns with your policy commitment to respect children's rights. For example, if developing a tool to analyse engagement metrics to match brands with influencers, consider how children may be impacted by such collaborations.</p>

<p>▶ Assess risks related to digital child labor</p> <p>As children increasingly participate in digital economies by creating content, building virtual experiences, and engaging audiences across platforms, it is important to recognize the full range of work they perform online. While child influencers are one prominent example, many children also create and sell virtual assets, design games, or contribute unpaid labor in digital communities. These activities often occur in informal or unregulated spaces, where legal protections are limited or absent. Children may be pressured or incentivized to produce content or generate income at the expense of their well-being, education, or development.</p>	<p><i>Evaluate whether ad-tech includes and identifies child influencers</i> and how AI may be used to suggest or match influencers with brands.</p>	<p><i>Within ad-tech that facilitates audience analytics, programmatic advertising, and content amplification</i>, assess how the parameters or models used to build the ad-tech consider potential risks to child influencers.</p>
<p>▶ Engage with children or legitimate representatives</p> <p>By consulting with children and their representatives (e.g., parents, caregivers or child rights advocates such as in civil society and academia), businesses can gain insight into children's real-world experiences, preferences and challenges.</p>	<p><i>Assess whether the company is in a position to engage children responsibly and plan appropriate approaches to consultation</i> (consult D-CRIA guidance on stakeholder engagement with children for further guidance).</p> <p>Conduct desk-based research and review existing sources documenting impacts and children's views in relation to digital marketing.</p>	<p><i>Responsibly consult with children, or if appropriate, children's representatives</i>, to better understand actual and potential impacts of your digital marketing policies and practices in diverse contexts. Document the views of children (or their representatives) and take them into account.</p> <p><i>Ensure any consultation is not a one-time engagement</i>, but rather a process in which participants understand the purpose of the consultation, how their insights will be recorded, and what actions have been taken by the brand as a result.</p>

 **TOP TIPS**

-  **Coordinate** among diverse functions, including data protection, marketing, brand safety, human rights/sustainability and compliance by creating a cross-functional working group.
-  **Involve** external child rights experts (e.g. civil society and academia) to help identify actual and potential impacts on children.
-  **Consult** with a function or individual who can bridge knowledge asymmetries on the topic due to the highly technical nature of ad-tech.

 **FURTHER RESOURCES AND GUIDANCE**

-  UNICEF, [D-CRIA Toolbox](#), and Spotlight guidance on [best practices for stakeholder engagement with children in D-CRIAs](#);
-  UNICEF, [Better Governance of Children's Data: A Manifesto](#);
-  UNICEF Innocenti, Global Office of Research and Foresight, [AI for Children](#).

C

Addressing impacts

Addressing impacts is the process of ensuring that identified risks to children are not only acknowledged but actively acted upon. By taking concrete action to address impacts, businesses demonstrate accountability, advance respect for children's rights, and strengthen stakeholder trust.



ACTION



RECOMMENDATION



Foundational



Mature

▶ Establish effective procedures to prevent and address identified impacts

Having internal procedures in place to prevent and address identified impacts on children ensures that companies can respond quickly and responsibly when harm occurs. These procedures also help to demonstrate accountability to external stakeholders, helping to build trust among consumers, regulators, and partners.

Establish procedures to take swift action where information is provided indicating there is an ongoing child rights or safety issue.

Customize your own responsibility checklist as a guide for ensuring a screening check for child rights considerations prior to launching any marketing related process or tool.

▶ Address data protection risks

Digital environments may be used to collect, analyze, and monetize children's personal data, putting children's right to privacy, non-discrimination, and freedom from economic exploitation at risk. The acquisition of children's personal data and any inferences derived from these data must be conducted on a lawful basis and in accordance with specific rules.

Avoid data collection and processing from children for any purpose other than basic site functions. Do not retain data and never collect and use/resell such data for the purposes of targeted, behavioral marketing. Children's personal data must always be acquired lawfully and in a manner consistent with their rights.

Establish clear due diligence procedures on the use of children's data when developing ad-tech, AI and data sets, ensuring that such technologies do not use children's data or inferences from such data.

▶ Embed child rights in data sharing decisions

The onward sale or sharing of children's personal data creates risks that data will be used in ways or for purposes not made clear to the child when the data were first collected.

Seek children's, or their parents' or guardians', meaningful consent for any onward sale or disclosure of personal data. This gives children greater control over who can access their personal data. Selling, brokering or sharing children's personal data must always be done lawfully.




Evaluate and communicate how sharing children's personal data will be in the best interests of the child. This includes evaluating how the data might be used by third parties, the potential for harm (e.g. profiling, targeting, or discrimination), and whether the child or their parents and/or caregivers were meaningfully informed of such data sharing at the time of collection.

<p>▶ Do not engage in segmentation of children based on their personal data</p> <p>Because the segmentation of children facilitates the serving of behavioural or targeted advertising to children, it raises a number of concerns for children's rights, particularly as it incentivizes the collection and storage of children's personal data.</p>	<p><i>Segmentation of children that is based on their browsing behaviour or other personal information should not be permitted or provided by ad-tech companies.</i> Any segmentation for advertising purposes should be based on context, e.g., the content of the site or app on which the ad is served, which cannot be tied to a specific user.</p>	<p><i>Prevent the segmentation of children based on their personal data.</i> Instead, consider privacy-by-design models that use contextual segmentation without tracking or identifying individual users.</p>
<p>▶ Address dark patterns</p> <p>Misleading practices and AI tools can exploit children by nudging them towards decisions that are not in their best interest. Dark patterns may include nudging techniques within cookie settings or interactive features, obscuring commercial intent, and the use of strong emotional appeals creating a sense of urgency or scarcity.</p>	<p><i>Prevent practices that risk misleading children into making choices that are not in their best interest</i> and the use of AI tools that may exploit them.</p>	<p><i>Consider whether the platform used to publish marketing communications contains</i> dark patterns and design elements that may take advantage of children.</p>
<p>▶ Prevent exposure to harmful content in digital marketing</p> <p>Ensuring that children are not exposed to advertising for unsafe, unhealthy or age-inappropriate products is an important dimension of ensuring respect for children's rights.</p> <p>Harmful products and services include (1) unhealthy products as defined by the World Health Organization or other independent bodies (e.g., ultra-processed foods and beverages, and those high in fat, sugar or salt), and (2) products and services that are illegal or harmful for children to consume or access (e.g. alcohol, pornography, tobacco, gambling, weight loss products).</p> <p>The content of digital marketing communications also plays a crucial role in shaping children's perceptions, behaviors, and well-being. Advertising that promotes age-inappropriate, unsafe, misleading, or exploitative messages (e.g. idealized or sexualized body images and overly commercialized values) can negatively impact children's physical and mental health, self-esteem, and development. Children are particularly vulnerable to persuasive techniques due to their evolving capacity to critically assess marketing messages.</p>	<p><i>Ensure that any targeting algorithms avoid promoting unsafe or age-inappropriate products and services</i> (e.g., gambling, unhealthy foods, tobacco, alcohol, pornography) in advertising that may be viewed by children.</p>	<p><i>Establish carefully curated inclusion lists and blocklists for marketing communications</i> based on your child rights digital marketing policy and findings of dedicated CRIAs.</p>




<p>▶ Consider timing in context</p> <p>Children are more likely to be online during specific hours, such as before 10:00 p.m. Therefore, broadcasting regulations in many countries restrict the publication of advertising not suitable for children during daytime hours and prohibit the interruption of children's programming with advertisements.</p>	<p><i>Deploy a broadcasting approach online, ensuring that advertising that is not suitable for children is not served on websites during hours when children are likely to be online, and that children's programming is not interrupted by advertising. Be mindful of varying time zones.</i></p>	<p><i>Work with child rights experts to better understand certain contexts that might pose risks to children that should be considered in choosing appropriate contexts for marketing communications.</i></p>
<p>▶ Prevent behavioural marketing to children</p> <p>Behavioural marketing based on personal data incentivizes corporate surveillance of users and consumers in order to serve individuals with tailored advertising based on their online activity. This type of marketing involves the collection of both personal and non-personal data to generate a profile of the user and make inferences about their purchasing preferences.</p> <p>Such techniques raise numerous concerns from the child rights perspective. For example, challenges around obtaining genuinely informed and unambiguous consent given the obscure nature of behavioural targeting and the difficulty in communicating it in simple language. There remains a power imbalance between content providers and advertisers and the consumers (including children and their parents or caregivers) who may not have the information or capacities to make informed decisions.</p>	<p><i>Do not enable brands and agencies to engage in behavioural marketing on sites accessed by children or engage in practices that require the collection, inference or use of additional personal data relating to children.</i></p>	<p><i>Establish and enforce a default prohibition on all forms of behavioural advertising and profiling on services accessed by children, including the use of inferred or non-personal data for targeting purposes. Adopt privacy-preserving, non-intrusive forms of advertising that do not rely on user tracking or profiling.</i></p>
<p>▶ Consider the role of age assurance tools</p> <p>Determining the age of individuals who may view or engage with a marketing communication is often challenging in digital environments. However, failing to determine age can lead to multiple risks, such as exposing children to harmful content in digital marketing (see above); compromising their privacy through data collection without appropriate consent; or restricting their access to age-appropriate information and services. Even when unintentional, these impacts can undermine children's rights to protection, privacy, and participation.</p>	<p>Avoid placing advertisements for products or services that are inappropriate for children, such as those related to alcohol, gambling, weight loss, or age-restricted entertainment in digital environments in digital environments likely to be accessed by children.</p>	<p><i>When developing ad-tech tools that optimize ad placement, conduct due diligence on whether age assurance tools are necessary and proportionate, given the ad's content.</i></p>
<p>▶ Establish Transparency</p> <p>Digital marketing directed at children should be transparent and identified clearly as advertising.</p>	<p><i>Ensure that children are not misled or deceived when viewing marketing content through means of integration or interaction that might obscure commercial intent. All marketing communications should be labelled with disclosures that are interruptive, prominent, and understandable by children.</i></p>	<p><i>Create accessible guidance for brands, agencies, and platforms on how to increase transparency about any marketing communications intended to reach children.</i></p>

<p>▶ Address digital child labor</p>	<p><i>Refrain from recommending working with influencers to brands and agencies without a robust code of conduct in place to mitigate risks associated with digital child labor.</i></p>	<p><i>Develop criteria/parameters within existing and emerging ad-tech recommender systems to prevent or mitigate risks to children when recommending child influencers or child content creators to brands and agencies.</i></p>
<p>The rise of child influencers and content creators has created new forms of labor that often fall outside existing legal protections. Without proper safeguards, children involved in digital marketing, whether promoting products, creating content, or appearing in ads, can face economic exploitation, excessive work hours, lack of privacy, and risks to their mental and physical health. Companies have a responsibility to ensure that their marketing practices do not contribute to or benefit from the commercial exploitation of children online.</p>		
<p>▶ Prevent harm linked with monetisation techniques</p>	<p><i>Avoid the use of in-app or in-game currencies to increase engagement with a particular brand.</i></p>	<p><i>Collaborate with industry stakeholders on establishing higher standards for the use of in-app currencies.</i></p>
<p>In-app currencies pose several risks for children, particularly in digital games and apps designed to encourage spending, as they may obscure real costs and can feature gambling-like mechanics.</p>		
<p>▶ Advocate for responsible practices</p>	<p><i>Share your child rights policy and code of conduct with new and existing clients to align expectations on responsible digital marketing practices.</i></p>	<p><i>Raise awareness about the impacts that certain ad-tech may have on children and how to prevent and mitigate harmful impacts through a child rights due diligence process.</i></p>
<p>As ad-tech providers must constantly adapt to client needs with creative agility, especially when it comes to data processing and AI, they are well-positioned to shape broader industry practices and norms.</p>		

TOP TIPS

-  **Coordination** between functions, including governance, compliance, sustainability, human rights, data protection and legal. Also engage more technical ad-tech related functions such as analytics, data science and engineering and account management.
-  **Coordinate** with child rights experts in civil society and academia to understand evidence-based pathways of addressing impacts.
-  Due to the highly technical nature of ad-tech, ensure to include a function or individual that can **bridge knowledge asymmetries** on the topic and facilitate dialogue between stakeholders.

FURTHER RESOURCES AND GUIDANCE

-  Conscious Advertising Network (CAN), [Children's Rights and Wellbeing](#)
-  The Child Influencer Project at the University of Essex, '[Children in Content](#)' [digital safeguarding toolkit](#)
-  Digital Futures Commission and 5Rights Foundation, [Child Rights by Design: Guidance for innovators of digital products and services used by children](#)

D

Monitoring and reporting

While monitoring and reporting are distinct activities, they are combined in this tool for simplicity. Monitoring refers to assessing the effectiveness of measures to prevent and address adverse impacts on children, through internal or external oversight. Reporting, or disclosure, involves sharing relevant information with stakeholders, typically through public channels such as annual or sustainability reports. Together, they promote transparency, accountability, and continuous improvement.



ACTION



RECOMMENDATION



Foundational



Mature

▶ Assign responsibility and resources for monitoring

Dedicating resources to monitor how child rights impacts are addressed ensures digital marketing practices continue to prevent and mitigate harm to children over time. Monitoring also opens up opportunities to ensure the company's approach to responsible business conduct continues to progress.

Dedicate an appropriate individual or team to monitor and oversee your company's efforts to address child rights impacts within the context of digital marketing. Human and financial resources dedicated to this function should be proportionate to the identified child rights risks.

A dedicated individual or team should review company policies, training, blocklists and inclusion lists aligned with actual and potential child rights impacts associated with digital marketing activities at regular intervals. This process should include stakeholder engagement and consultation.


▶ Track progress over time




Tracking progress demonstrates transparency and accountability in addressing child rights impacts. Clear and consistent tracking using key performance indicators (KPIs) helps brands measure the effectiveness of their measures to embed respect for child rights and informs internal decision-making for continuous improvement.


Establish clear targets that have measurable KPIs you can regularly report on based on child rights policies.



Integrate child rights KPIs into broader business performance and sustainability frameworks, and regularly review them with input from affected stakeholders, including children where appropriate.

<p>▶ Provide detailed reports to business partners and clients</p> <p>Ensuring that brands and agencies have access to detailed, verifiable information about where their ads are served is an essential transparency measure. Log-level records, such as page-level or placement-level reporting, can help identify whether ads are appearing alongside harmful or illegal content. Providing access to log data supports accountability across the advertising ecosystem and enables more effective monitoring, investigation, and risk mitigation.</p>	<p><i>Establish internal protocols for recording where ads are placed</i> and respond promptly to requests for more detailed information, especially in cases where harm to children is suspected or reported.</p>	<p><i>Provide brands and agencies with access to detailed log-level data</i> (such as page-level URLs, timestamps, and content context) for all ad placements.</p> <p>Implement automated flagging systems to detect and report placements alongside harmful or illegal content, including child sexual abuse materials or age-inappropriate material.</p> <p>Collaborate with civil society and investigative bodies to audit ad placements and improve accountability across the supply chain.</p>
<p>▶ Disclose performance</p> <p>Effective reporting goes beyond KPIs to include decision-useful information such as context, narrative, outcomes, and stakeholder perspectives that enable investors, regulators, and rights-holders to evaluate a company's performance in relation to child rights and safety risk.</p>	<p><i>Document and share key actions taken to respect children's rights in the context of digital marketing</i>, such as policies, safeguards, or general approaches to identifying and addressing risks.</p> <p>Use accessible formats, such as a company website, or customer communications, to demonstrate a commitment to transparency and accountability, even if full reporting processes are still being developed.</p>	<p><i>Based on your established targets, document and communicate</i> the results of CRIAs and measures to address impacts as well as types of complaints received and how they were dealt with in external communication, such as a sustainability report.</p>

 **TOP TIPS**

-  **Coordination** between functions, including governance, compliance, sustainability, human rights, data protection and legal. Also engage more technical ad-tech related functions such as analytics, data science and engineering and account management.
-  **Create** channels for communicating internally and externally with diverse stakeholders.
-  **Allocate** resources for educating relevant teams on the corporate responsibility to respect child rights.

 **FURTHER RESOURCES AND GUIDANCE**

-  UNICEF, [Disclosure Recommendations for Corporate Reporting on Child Rights Impacts in Relation to the Digital Environment](#)
-  UNICEF, Guidance briefs for companies – [Unpacking Children's Rights under the European Sustainability Reporting Standards](#)

E

Handling complaints

Access to complaints mechanisms is a crucial and integral part of creating responsible business practices that respect child rights. Effective complaints procedures provide children and their parents or caregivers with flexible, accessible, expedient and cost-effective ways of communicating concerns. They also help businesses identify actual impacts and integrate these findings into the existing child rights due diligence process.

As intermediaries, ad-tech providers may not necessarily be acknowledged by children or their parents/caregivers as part of the digital marketing ecosystem. They may instead associate a commercial communication only with the brand of the product or service being advertised or the platform on which the advertisement is seen. It is nevertheless important for ad-tech providers to be made aware of complaints users share with brands or platforms about any marketing associated with their services.



ACTION



RECOMMENDATION



Foundational



Mature

▶ Establish and maintain accessible complaints mechanisms

Enabling children and their representatives to submit complaints is vital for ensuring children have access to remedies when things go wrong. The ability to raise concerns also empowers children, increases transparency, builds consumer trust, and facilitates notification mechanisms that can inform ongoing learning in the due diligence cycle.

Establish an accessible complaints mechanism(s) for clients, such as brands and platforms, to share complaints, either from them or received from children and their caregivers, in order to inform your due diligence process on existing ad-tech impacts and contribute to remediation if necessary.

Actively advocate for platforms and brands you work with to have accessible complaints mechanisms. Require the maintenance of complaint mechanisms by partners and clients and integrate feedback loops to understand how your services might be linked or contributing to negative impacts on children.

▶ Establish a clear contact point

Companies should establish a clear contact point for affected stakeholders. Relevant business partners should also be expected to share this contact point if they are in direct contact with potentially affected rightsholders. This provides a notification mechanism that strengthens due diligence processes and ensures direct channels of communication with affected stakeholders.

Given that marketing communications can be seen on diverse digital platforms, communicating the importance of complaints mechanisms to platforms is an important step.

Establish a clear contact point in addition to a mechanism for clients (brands, agencies and/or platforms) to share feedback and complaints on matters associated with child rights impacts of digital marketing.

Establish well-defined expectations within business partnerships, such as brands, agencies and platforms, that the availability of complaints mechanisms and the relevant contact points will be clearly communicated.

 TOP TIPS

Engage with multiple corporate functions, including legal and compliance, human rights, risk management, communication and public affairs, marketing and brand safety.



Consult external experts on creating and operating complaints mechanisms appropriate for different stakeholder groups, including children.



Communicate with existing business partners about active complaints procedures and share complaints received with business partners as relevant.



FURTHER RESOURCES AND GUIDANCE

-  UNICEF, [Discussion Paper: Operation-level grievance mechanisms fit for children](#)
-  UNICEF and UN Human Rights, [Taking a Child Rights-Based Approach to Implementing the UNGPs in the Digital Environment](#)



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Conclusion

Ad-tech providers' influence extends across the entire digital advertising ecosystem – from data collection and audience segmentation to automated bidding and ad placements. Ad-tech providers must navigate complex relationships with multiple stakeholders, including brands, platforms and regulatory bodies, each with differing levels of commitment to children's rights and well-being. This demands that ad-tech providers take a proactive approach, embedding child rights safeguards into their technologies to prevent unintended harm.

Children engage with digital spaces in ways that brands may not always anticipate, encountering marketing content not specifically designed for them. As the architects of automated bidding algorithms and audience profiling mechanisms, ad-tech providers bear significant responsibility for shaping how ads reach audiences, including children. Without adequate child rights due diligence, their systems may unintentionally serve unsuitable ads, raising concerns around privacy, digital safety and persuasive design tactics that may exploit children. Therefore, ad-tech providers are well placed to influence responsible development and deployment of ad-tech technologies.

This concludes [Step 3 – Act of UNICEF's Industry Toolkit on Children's Rights and Digital Marketing](#). As a next step, take the time to compile the relevant recommendations and begin to construct an action plan for implementation.

Remember [Step 2 – Assess](#) can always be revisited to reevaluate your current practices and track your progress over time.

[Step 3 – Act](#) is also available with specific recommendations for other players in the digital marketing ecosystem, namely agencies, brands, and platforms. Consider sharing these with respective business partners, suppliers, and other businesses in your network.



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