



INDUSTRY TOOLKIT ON
CHILDREN'S RIGHTS AND
DIGITAL MARKETING

unicef 
for every child

STEP 3 – ACT

Recommendations for *Agencies*

February 2026

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Contents

Introduction to Step 3 - Act	04
1. Recommendations for agencies	05
A. Setting Policy Commitments	06
B. Identifying and assessing impacts	08
C. Addressing impacts	11
D. Monitoring and reporting	15
E. Handling complaints	17
2. Conclusion	19

Acknowledgements

This toolkit was written by Sabrina Rau and Josianne Galea Baron, under the supervision of Ida Hyllested and Afroz Kaviani Johnson (UNICEF). We extend our thanks for feedback from UNICEF colleagues, Daniel Kardefelt Winther and Katherine Shats.

The toolkit has benefitted from inputs and comments from a range of external experts. We would particularly like to thank: Alex Murray and Yeo Joung Suh (Conscious Advertising Network); Catarina Fugulin; Daisy Johnson (Dentsu); Dunstan Allison-Hope; Francis Rees (University of Essex); Giulia Nava (Shein Group); Karen Middleton (University of Portsmouth); Maria Góes de Mello and João Francisco de Aguiar Coelho (Alana); Maria Marta Dias Heringer Lisboa (MartinsVillac Advogados); Maristela Miranda (Lights Institute); Sara M. Grimes (McGill University); Simone van der Hof (University of Leiden); Sumanthi Menon (Mave Social); Valerie Verdoodt (Ghent University); and Xanthe Pickford-Avery (The 7 Stars).

We are grateful for the support from Inter IKEA Group in making this toolkit possible, and for the input provided by Alexander Galt, Daniela Gonzalez Riedel, Gianluca Toccafondi, Sarike van Hees, and Nicole Bjerler.

Edited by Catherine Rutgers.

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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 agencies, 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, brands, and ad-tech providers. 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


Marketing agencies serve as strategic intermediaries in the digital marketing ecosystem, bridging the gap between brands and consumers through expertise in digital marketing strategies from content to context and design. As intermediaries, agencies are not typically easily identifiable by end users or consumers of a particular marketing communication. Instead, it is brands that seek out marketing agencies as business partners with the industry knowledge, technological abilities, and the ability to maximize visibility and engagement to market their products and services.

Marketing agencies face distinct challenges compared to other actors in the digital marketing ecosystem when integrating child rights considerations into their operations. Unlike brands, which control their own messaging and policies, agencies must navigate the diverse expectations of multiple clients, each with unique objectives and varying levels of commitment to child rights. Complications may arise, for example, when potential brand briefs present risks to children. Conducting due diligence on the risks to children as a result of new business relationships is therefore an essential part of ensuring agencies meet their responsibility to respect child rights within their operations.

By managing advertising budgets, analysing consumer behaviours, and implementing innovative strategies, marketing agencies influence how and where content is created and distributed. Their position as advisers allows them to shape industry trends and influence standards related to ad placements, responsible business practices, and performance metrics, making them integral players in the broader digital marketing ecosystem.

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 agencies: *Sample scenario*

A digital marketing agency was hired by a global beauty retailer to run an online advertising campaign for a new adult skincare line. The agency developed a highly targeted ad strategy using behavioural tracking and algorithm-driven placements. The campaign included gamified ads, influencer collaborations, and interactive features such as virtual try-ons. While the brand primarily targeted adults, the agency's ad placement algorithms resulted in a significant number of teenagers being exposed to the campaign.

This **hypothetical scenario** aims to illustrate common practices by agencies and associated child rights challenges.

This scenario raises a number of concerns, including but not limited to:



Children may participate in the virtual try-on feature. This collection of children's data risks misuse by the brand, agency, or third parties.


This scenario illustrates how the manner in which digital marketing communications are designed may negatively impact child rights. For this reason, conducting due diligence is vital for preventing and mitigating harmful impacts associated with digital marketing practices.



Collaborations with influencers that have many child followers can result in excessive emotional appeal and peer pressure, compelling children to buy products (in this case, products not suitable for children).



The content of the advertisements may negatively impact body image and have a disproportionate impact on girls.

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



Challenge trends encourage interactive, immersive engagement that can make a commercial message opaque to children.

1

Recommendations for agencies

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 agencies 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.

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

<p>▶ Ensure accessibility</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><i>Ensure relevant company policies are easily available</i> and presented in language that is accessible to non-technical readers, including parents or caregivers.</p>	<p><i>Develop specific child-friendly versions of relevant company policies, including digital marketing policies,</i> and ensure they are presented in accessible formats.</p>
<p>▶ Embed child rights commitments in business relationships</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><i>Ensure that policy commitments are reflected in contracts or reference materials</i> within new and existing business relationships.</p>	<p><i>Establish a supplier code of conduct</i> based on the company's child rights commitments and make this code/ policy publicly available.</p>
<p>▶ Assign responsibility</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><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 business practices, including digital marketing.</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>

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.



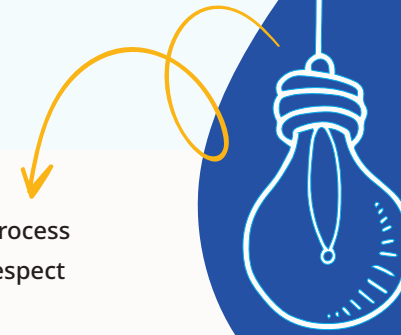
FURTHER RESOURCES AND GUIDANCE

-  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.

Whether or not children are the primary audience for your product or service, assess how children may be affected by the content, context and design of your digital marketing.

Consider impacts as early as possible, from conceptualization to distribution stages. Consider all aspects of the brief, including creative messaging, product, media channels, targeting practices, etc.

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, considering a new client, 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 digital marketing and whether certain contexts might increase risks to children.


Use the D-CRIA toolbox to conduct an impact assessment of digital business activities, including digital marketing. 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 may be used</i> in the development and targeting of digital marketing content.</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 digital marketing – including in the development and deployment of ad-tech.</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</i> in diverse contexts (e.g. generating marketing content, targeting practices, advertising features within virtual and/or augmented reality, or embedded in gaming environments).</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> For example, consider the impacts and use of AI through ad-tech subscriptions and platforms that host marketing communications.</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 influencer content or affiliate programmes are permitted,</i> assess the risks to children that might be associated with the influencer's audience.</p>	<p><i>Develop a code of conduct for working with influencers</i> that includes references to your company's child rights policies and required safeguards and it available to any brands or platforms you work with. <i>Use this code of conduct as a guide for future impact assessments.</i></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 risks related to digital child labor</i> when collaborating with influencers and content creators, whether adults or children.</p>	<p><i>Within a code of conduct for working with influencers and content creators</i>, whether children or adults, include guidance on how to respect children's rights in labour contexts.</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 as a result.</p>

 **TOP TIPS**

 **Coordinate** among diverse functions, including data protection, marketing, brand safety, and human rights or sustainability 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.

 **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 at the inception phase of any marketing communication.

▶ 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 procuring new products and services, such as ad-tech, AI and data sets, ensuring that such technologies do not use children's data or inferences from such data.

When working with third parties and media owners, have a process in place to understand their data policies around child data collection/usage and ensure that this is part of the onboarding for new suppliers.

▶ Address dark patterns

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.

Prevent practices that risk misleading children into making choices that are not in their best interest and the use of AI tools that may exploit them.

Consider whether the platform used to publish marketing communications contains dark patterns and design elements that may take advantage of children.

<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>Implement effective measures to prevent the promotion of 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 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 likely to be accessed by children.</p>	<p><i>When choosing where to place an advertisement</i>, conduct due diligence on whether age assurance tools are necessary and appropriate given the content. Assess whether available age assurance tools are effective at preventing inappropriate content exposure to children.</p>
<p>▶ Establish transparency</p> <p>Digital marketing that may be viewed by children should be transparent and identified clearly as advertising.</p>	<p><i>Ensure that children are not misled or deceived when viewing marketing content</i> 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.</p>	<p><i>Ensure consistency in transparency labels across diverse channels</i> (e.g. search, display, social, influencer and native advertising) and support children by developing interactive or educational tools (e.g. icons, pop-ups or explainer boxes) that actively inform children how to identify advertising and understand commercial intent.</p>

<p>▶ Be transparent when working with influencers</p> <p>Children are particularly susceptible to influence, especially when it comes from popular figures. Establishing safeguards ensures that marketing communications delivered through influencers are age-appropriate and do not exploit children. Developing a code of conduct contributes to a framework of accountability and creates consistency across partnerships and collaborations.</p>	<p><i>Create accessible guidance or a code of conduct for influencers</i> on how to increase transparency about any marketing communication.</p>	<p><i>Provide child-friendly guidance about the commercial underpinnings of influencer marketing</i> and other forms of marketing through images, logos or pop-up boxes to signal influencer content.</p>
<p>▶ Address digital child labor</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><i>Refrain from working with influencers without</i> a robust code of conduct in place to mitigate risks associated with digital child labor.</p>	<p><i>Develop a dedicated code of conduct for working with influencers.</i> Factors to consider include: restricting the number of working hours for children; fair compensation; availability of appropriate support; ensuring children and their parents/caregivers are aware of the potential risks; and ensuring opportunity for feedback before any content goes live.</p>
<p>▶ Safeguard children appearing in advertising</p> <p>Children should not be featured in advertising for products that are not suitable for children, are unhealthy for children, or are harmful/illegal for children to consume or access. Where children are featured in advertising, robust safeguarding measures must be in place to prevent harm.</p>	<p><i>Establish robust child safeguarding measures to ensure children's participation is a safe and positive experience.</i></p> <p><i>Where children are featured in advertising materials for products designed for children,</i> such advertising should be fair, transparent, truthful and portray children in accordance with their evolving capacities.</p>	<p><i>When advertising that features children appears on websites, applications and services,</i> ensure that it is consistent with child rights – including that advertising content and context are suitable for children.</p>
<p>▶ Prevent harm linked with monetisation techniques</p> <p>In-app currencies pose several risks for children, particularly in digital games and apps designed to encourage spending, as they obscure real costs and can feature gambling-like mechanics.</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>

▶ Advocate for responsible practices

Because agencies must constantly adapt to client needs with creative agility, they are highly trend-sensitive and thus well-positioned to shape broader industry practices and norms.

Share your child rights policy and code of conduct with new and existing clients to align expectations on responsible digital marketing practices.

Raise awareness about the impacts that certain marketing communication practices may have on children and how to prevent and mitigate them through child rights due diligence.

TOP TIPS







Coordinate between functions, including governance, compliance, sustainability, human rights, data protection and legal.



Coordinate with child right experts in civil society and academia to understand evidence-based pathways of addressing impacts.



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](#)
-  [Responsible Kidfluence Code](#)
-  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 agencies 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.

▶ Disclose performance

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 an agency's performance in relation to child rights and safety risk.

Document and share key actions taken to respect children's rights in the context of digital marketing, such as policies, safeguards, or general approaches to identifying and addressing risks.

Use accessible formats, such as a company website, or client communications, to demonstrate a commitment to transparency and accountability, even if full reporting processes are still being developed.

Based on your established targets, document and communicate 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.

 **TOP TIPS**

Coordinate between communication, governance, oversight and reporting functions within the company.



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, agencies may not necessarily be acknowledged by children or their guardians as creators of a marketing communication. They may instead associate a commercial communication only with the brand of the product or service being advertised. It is nevertheless important for brands to be aware of existing grievance mechanisms and be able to share any complaints they receive.



ACTION



RECOMMENDATION



Foundational



Mature

▶ Establish 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) to allow children and their parents or caregivers to report incidents related to marketing communications from your agency (even if the marketing communication was seen in a digital environment not controlled by the agency e.g. a social media site).

Ensure accessible and child-friendly language is used to describe the process of submitting a complaint and make this information available in diverse languages, as relevant. The mechanism should include information on the process for receiving, handling, investigating and responding to complaints.

Within the complaint mechanism(s) and information on the process, commit to clear timelines for providing responses to affected stakeholders.

Consult with stakeholders on what accessible complaints mechanisms should look like in the context of your digital marketing activities.

Track and report on response times and related metrics in your corporate reporting.

▶ Establish a clear contact point

Companies should establish a clear contact point for affected stakeholders. Relevant business partners and clients 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 feedback and complaints on matters associated with child rights impacts of digital marketing.

Establish well-defined expectations within business partnerships, such as with 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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2

Conclusion

As intermediaries, marketing agencies frequently work with third-party platforms and content creators, adding layers of accountability and potential exposure to child audiences beyond direct agency oversight. Ensuring responsible business practices in influencer/content creator collaborations, such as transparent disclosures and age-appropriate content, requires agencies to implement comprehensive due diligence processes, including impact assessments, which may not always align with the fast-paced demands of digital marketing. Additionally, agencies often rely on automated ad-buying technologies that can target children due to algorithmic decision-making, requiring constant monitoring and refinement of ad parameters.

While these factors generate a web of interconnected challenges, they also present great opportunities for marketing agencies to proactively advocate for responsible digital marketing practices and lead the changes that will create safer and rights-respecting environments for children online.

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 brands, ad-tech providers, and platforms. Consider sharing these with respective business partners, suppliers, and other businesses in your network.

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Published by the Child Protection and Migration Global Practice,
Global Programme Division, UNICEF.

Email: childprotection@unicef.org.

Website: www.unicef.org.

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