



INDUSTRY TOOLKIT ON
CHILDREN'S RIGHTS AND
DIGITAL MARKETING

STEP 3 – ACT

Recommendations for *Platforms*

February 2026

unicef 
for every child





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Acknowledgements

This toolkit was written by Sabrina Rau and Josianne Galea Baron, under the supervision of Ida Hyllested and Afrooz 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 platforms, 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 brands, agencies, 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

Platforms¹ play a central role as gatekeepers in the digital marketing ecosystem, serving as powerful actors that shape the flow, visibility and modes of engagement with marketing communications. Platforms interact directly with rights-holders as they design online experiences through marketing tools that support algorithmic curation, ad placements and data-driven targeting.

By controlling the mechanisms that determine reach, audience segmentation and content moderation, platforms' leverage extends across multiple stakeholders, including brands, advertisers and agencies. By setting policies on age-appropriate content, data privacy and advertising transparency – and controlling much of the design and context in which marketing communications are presented – platforms wield significant potential to impact child rights. This shapes both what children see and how they engage in digital spaces, reinforcing the need for accountability to prevent and mitigate exposure to harmful marketing practices that risk exploiting children.

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.

¹ The responsibility to respect children's rights in the context of digital marketing extends to all kinds of 'publishers'. This toolkit uses the term online 'platform' as shorthand to capture a broad range of digital environments where children interact with others and with content. The use of this term does not imply any limitation or exemption of such services from applicable legal responsibilities.

The role of platforms: *Sample scenario*

A popular social media platform widely accessed by children provides a variety of pathways for brands to share their marketing communications with users, including AI-driven ad placements and engagement-based monetization. The platform offers personalized ads based on inferences made from users' engagement.

While the platform has published robust child safety policies, its recommendation algorithms prioritise high-engagement content, and through contextual advertising features often amplifies ads for products with strong emotional appeal that encourage increased engagement. For example, a child watching a video about bullying may receive advertisements for products geared to increase confidence (e.g. beauty products). The platform also hosts a large number of influencers, including child influencers, but does not enforce clear labels on ads or sponsored content.

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

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



Use of children's data in behavioural tracking and respective ad placement.



Engagement-based monetization that increases risks of exposure to inappropriate ads such as those with strong emotional appeals in times of vulnerability.



Blurring the distinction between advertising and entertainment through influencer marketing, and engagement activities such as challenge trends.




Risk of commercial exploitation, such as inappropriate purchases, due to the highly emotional appeal of peer-driven engagement.



Obscuring commercial intent through lack of clear labels, icons or other visual cues that signify ads or sponsored content.

This scenario illustrates that while platforms may not directly create harmful content, their algorithmic structures and monetization strategies can expose children to exploitative marketing practices. For this reason, conducting child rights due diligence is vital for preventing and mitigating harmful impacts associated with digital marketing.

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

1

Recommendations for platforms

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 platforms 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.

<p>▶ Acknowledge vulnerability and inclusion</p>	<p><i>Introduce specific acknowledgement and commitments relating to the needs of children in disadvantaged or vulnerable situations</i> within policy commitments.</p>	<p>Consider how digital marketing policy and delivery systems can promote inclusion and non-discrimination. This extends to algorithmic systems that distribute marketing content.</p>
<p>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.</p>	<p>Vulnerability here is linked with access to the means or resilience to manage online risks effectively (e.g. economic or social resources).</p> <p>Prevent advertising tools, targeting criteria and optimization models from producing discriminatory outcomes.</p>	<p>See UNICEF's Promoting Diversity and Inclusion in Advertising: A UNICEF playbook for further guidance.</p>
<p>▶ Ensure accessibility</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>Alongside your policy commitment, provide accessible information about how your company's policies on children translate into content moderation techniques, community standards, monetization strategies and your business model.</i> Outline how the company intends to enforce these policies, and the consequences of non-compliance.</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 content moderation decisions, personalization algorithms, and user experience (UX) design.</p>
<p>▶ Embed child rights commitments in business relationships</p>	<p><i>Ensure that policy commitments are reflected in contracts, terms and conditions, 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>		

▶ Assign responsibility

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.

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 business practices, including digital marketing.

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.

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.



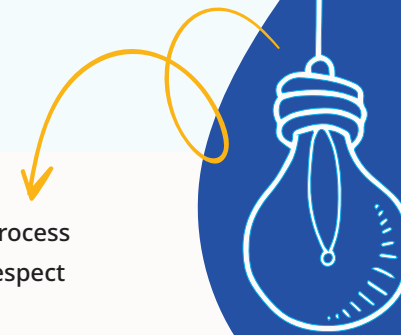
FURTHER RESOURCES AND GUIDANCE

-  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 your primary user group, assess how children may be affected by the content, context and design of marketing that appears on your platform.

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 launching a new product or feature, 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 the marketing communications permitted on your platform. Evaluate whether certain contexts or features might increase risks to children.


Use the D-CRIA toolbox to conduct an impact assessment of digital marketing activities. 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 may be collected and processed</i> for the purpose of marketing on your platform.</p>	<p><i>Conduct a comprehensive data protection impact assessment</i> that considers the risks to children as a result of data processing related to digital marketing practices permitted on your platform.</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 how child rights considerations feature in your company's AI governance practices.</i> For example, consider the impacts associated with AI-generated marketing content by brands or agencies.</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 permitting and encouraging monetization techniques for influencers.</p>	<p><i>Develop a code of conduct or similar set of standards for brands, agencies, content creators, and ad-tech providers on branded content</i> that includes references to your company's child rights policies and required safeguards. Make this easily accessible. Use this code of conduct as a guide for future impact assessments.</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> in the context of child influencer activity and children featured in adult influencer content.</p>	<p><i>Within a code of conduct for 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 by the platform as a result.</p>

 **TOP TIPS**

 **Coordinate** among diverse functions through a cross-functional working group, including data protection, privacy, content policy, legal and compliance, product policy, marketing, brand safety, UX design and subject matter experts.

 **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.

Integrate continuous monitoring and compliance checks into your platform-wide child rights assessment before launching new marketing tools. Monitor any breaches of your child rights policy, terms and conditions, and community standards.

▶ 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 and managed lawfully and in a manner consistent with their rights.

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

▶ Embed child rights in data processing decisions

Ensuring that child rights considerations are embedded in data processing decisions is a vital component of preventing exploitation and fostering a safer digital environment.

Do not engage in profiling or targeting of children of any age for commercial purposes on the basis of a digital record of their actual or inferred characteristics, including group or collective data, targeting by association or affinity profiling.

Communicate externally how children's data are processed and for what purpose, including how such processing is designed to uphold the best interests of children.

<p>▶ Embed child rights in data sharing decisions</p>	<p><i>Seek children's, or their parents' or guardians', meaningful consent for any onward sale or disclosure of personal data.</i> 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.</p>	<p><i>Evaluate and communicate how sharing children's personal data will be in the best interests of the child.</i> 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>
<p>The onward sale or sharing of children's personal data or inferences thereof creates risks that data will be used in ways or for purposes not made clear to the child when the data were first collected.</p>		
<p>▶ Restrict cookies</p>	<p><i>Restrict the use of non-essential cookies</i> used to further commercial interests where prior consent is not obtained or where child rights may be adversely impacted.</p>	<p><i>Prohibit the use of tracking technologies, including cookies, for advertising purposes on services likely to be accessed by children.</i> Ensure that the highest privacy-preserving settings are the default.</p>
<p>Cookies on online platforms can expose children to excessive data collection, enabling targeted advertising that may manipulate their preferences, limit their autonomy, and increase their vulnerability to commercial exploitation.</p>		
<p>▶ Do not engage in segmentation of children based on their 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 to third parties.</i> Any segmentation for advertising purposes should be based on context. Ensure that any segmentation aligns with non-personal contextual targeting principles.</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>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>▶ Address dark patterns</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>Conduct regular UX reviews</i> to ensure that ad-serving mechanisms and tools do not incorporate dark patterns impacting children's rights and well-being.</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>Ensure default privacy settings are the most privacy protective. Make privacy-enhancing options accessible (e.g. by keeping 'clicks' to activate privacy options to a minimum).</p>	<p><i>Report and reflect</i> on the impact of positive, privacy-affirming 'nudging' techniques.</p>

<p>▶ Address persuasive design impacts</p> <p>Infinite scrolling, autoplay features, algorithmically optimized content loops, streaks, and other intensive engagement features can lead to excessive screen time, reduced attention spans, difficulty in self-regulating digital interactions, and overall mental health impacts. These engagement mechanisms are driven by business models dependant on increasing advertising content shown to users.</p>	<p><i>Build-in features that support children to take pauses in their activities</i> within the platform without perceived penalties.</p>	<p><i>Engage stakeholders to explore and apply positive design mechanisms that support child well-being.</i></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>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>Implement tailored content moderation processes 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,</i> ensuring that advertising that is not suitable for children is not served your platform during the hours children are likely to be online, and that children's experiences should is not interrupted by advertising. Be mindful of varying time zones.</p>	<p><i>Develop innovative solutions prevent children's exposure to harmful content in digital marketing</i> at times when children are likely to be online across different time zones.</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>Prevent brands and agencies from executing behavioural ad targeting based on children's personal data.</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 likely to be accessed by children.</p>	<p><i>When developing and deploying 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>Assess whether available age assurance tools are effective at preventing inappropriate content exposure to children.</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</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>Create accessible guidance for brands and agencies</i> on how to increase transparency about any marketing communications aimed to reach children.</p> <p><i>Empower children by developing interactive or educational tools</i> (e.g. icons, pop-ups or explainer boxes) that actively teach children how to identify advertising and understand commercial intent.</p>

<p>▶ Distinguish commercial content with clear cues</p> <p>Visual cues can help children distinguish commercial content from organic content, ensuring transparency and reducing the risk of manipulation.</p> <p>Since children have developing cognitive abilities and may struggle to recognize advertisements disguised as entertainment, clear indicators – such as labels, contrasting colours or distinct icons – help them identify promotional material, make informed decisions, and resist persuasive tactics that may exploit them.</p> <p>Without these cues, children may unknowingly engage with ads, leading to excessive exposure to commercial influence and potential financial exploitation.</p>	<p><i>Do not blur advertising (no integration into other content).</i> Children's entertainment or educational content should be clearly separated from advertising. Signal to children that they are viewing, or about to view, an ad by using formats and cues, such as icons or labels.</p>	<p><i>Engage with researchers or cross-industry collaborative initiatives</i> to identify and evaluate the most effective formats for cues to signal commercial content.</p>
<p>▶ Ensure transparency by influencers and content creators</p> <p>Because children are still developing their critical thinking skills, it can be difficult for them to tell the difference between commercial and other forms of content. For example, they might not recognize that an influencer has financial incentives to promote a product. This can lead to undue trust in marketing messages, excessive consumerism, and susceptibility to manipulative advertising tactics.</p> <p>Clear disclosures, such as visible labels or verbal acknowledgements, empower children to make informed choices, foster digital literacy, and reduce the risk of exploitative marketing practices that blur the lines between entertainment and commercial influence. Without such transparency, children are more vulnerable to persuasion, which can shape their purchasing behaviours and perceptions in ways they may not understand.</p>	<p><i>Create and use an easy-to-see and easy-to-understand icon</i> that signals to children when money or free products are provided to the content creator or influencer to advertise the product. This can be done through a combination of visual and verbal cues.</p>	<p><i>Set clear requirements within your guidance for influencers and content creators</i> on how to achieve transparency.</p>
<p>▶ Support influencers and content creators</p> <p>Influencers, especially those with young audiences, have a responsibility to ensure that marketing communications are clear, truthful, and age-appropriate. At the same time children should be supported in developing the media literacy skills needed to recognize and critically reflect on influencer marketing practices.</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 resources explaining the commercial underpinnings of influencer marketing</i> and other forms of marketing.</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>The rules on how children can be featured in advertising should be clearly stated in content moderation guidelines and tools to ensure adherence to terms of service or community standards.</p>	<p><i>Ensure content moderation tools assess where and how children are featured in advertising materials for products designed for children.</i></p> <p>Where children are featured in advertising materials for products designed for children, such advertising should be fair, transparent, truthful and portray children in accordance with their evolving capacities.</p>	<p><i>Ensure that when advertising that features children appears on your platform, it is consistent with child rights – including that advertising content and context are suitable for children.</i></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>Establish and implement a robust code of conduct to mitigate risks associated with digital child labour.</i> Also consider risks to children appearing in influencer marketing created by adults.</p>	<p><i>Develop resources for to support influencers.</i> Factors to consider include: restricting the number of working hours for children; fair compensation; availability of appropriate support; and ensuring children and their parents/ caregivers are aware of the potential risks.</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 may 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 on your platform or 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>▶ Provide parental control tools</p> <p>Parental controls can help safeguard children from inappropriate or overly intrusive advertising practices. These controls can help to limit children's exposure to personalized ads, prevent excessive data collection, and block content that may not be age-appropriate. Such controls should also respect children's rights, and provide different levels of oversight for children of different age groups.</p>	<p><i>Provide user-friendly parental control tools related to digital marketing</i> (e.g. restricting access to certain platform features and restrict in-app purchases). Introduce parental notifications, activation delays or disabling the facility to change defaults without parental involvement.</p> <p>Where tools allow parents or caregivers to monitor children's activity or track their location, provide an obvious sign to the child when they are being monitored.</p>	<p><i>Critically evaluate the effectiveness of available parental control tools when it comes to children's exposure to digital marketing</i> and engage with external stakeholders, including rights-holders, to action improvement strategies.</p>

 TOP TIPS




Coordination between functions, including governance, compliance, sustainability, human rights, data protection, content policy, product policy, product counsel, growth and marketing, trust and safety and community/user support.



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](#)
-  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 businesses 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><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.</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. Implement automated flagging systems to detect and report placements alongside harmful or illegal content, including CSAM or age-inappropriate material. Collaborate with civil society and investigative bodies to audit ad placements and improve accountability across the supply chain.</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>▶ Disclose performance</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><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>
<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>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> TOP TIPS</p>	<p> FURTHER RESOURCES AND GUIDANCE</p>
<p> Coordinate between communication, governance, oversight and transparency reporting functions within the company.</p> <p> Create channels for communicating internally and externally with diverse stakeholders.</p> <p> Allocate resources for educating relevant teams on the corporate responsibility to respect child rights.</p>	<p> UNICEF, Disclosure Recommendations for Corporate Reporting on Child Rights Impacts in Relation to the Digital Environment</p> <p> UNICEF, Guidance briefs for companies – Unpacking Children's Rights under the European Sustainability Reporting Standards</p>

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.

Due to their direct contact with children and their parents or caregivers, platforms are well-placed to offer easily accessible complaints mechanisms. Understanding that design and context choices greatly influence how accessible a complaints mechanism is, this final step in the child rights due diligence cycle provides critical insights.



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 accessible reporting tools to allow children and their parents or caregivers to report incidents related to marketing communications on the platform.

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.

Conduct stakeholder engagement, including with children as appropriate, on how to improve the accessibility of reporting tools. Consider UX design features on your platform that may simplify the process of reporting a problem.

▶ 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.

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 brands and agencies, that complaints mechanisms are available and the relevant contact points will be clearly communicated.

 TOP TIPS

Engage with multiple corporate functions, including legal and compliance, human rights, trust and safety, 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

Platforms influence how digital marketing content is delivered, shaping children's exposure to ads through interface design, algorithmic placement, automated bidding, and audience segmentation. Without robust child rights due diligence, these practices can expose children to various risks including privacy violations, manipulative design practices, and harmful content. Platforms also play a vital role in determining transparency standards, influencing whether commercial intent is clearly communicated, and establishing the parameters of how content can be monetized.

While these practices demand careful management, they also present an opportunity for platforms to lead industry-wide change by embedding child rights into their core practices. Strengthening safeguards through child rights due diligence creates a safer digital environment that respects children's rights and well-being. By setting responsible marketing standards, platforms can support compliance and drive systemic improvements that benefit both children and the broader industry.

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



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

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Website: www.unicef.org.

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