



Why businesses should invest in digital child safety

Digital products and services are providing children with tremendous opportunities to learn, share and communicate. They provide access to information about social services, health and educational resources, and they empower children to assert their rights and express their opinions. But despite the benefits, children may face risks – such as violations of their privacy and exposure to inappropriate and potentially harmful content or contact – when using the Internet and mobile technology.

Companies operating in the information technology industry are often engaged in developing and offering online services, solutions and applications that directly target children as consumers. Such companies include software, application and game developers, mobile operators, Internet service providers (ISPs), search engines and social media. The increase in technology use among children has brought on new and more complex challenges not only for Government regulators but also for the companies that develop and offer products, the children who use the products and the families, educators and civil society groups looking to support and protect children.

Guidelines for Industry on Child Online Protection

To support businesses in addressing the challenges, UNICEF and the International Telecommunication Union have updated the [Guidelines for Industry on Child Online Protection](#) in consultation with business and civil society. The Guidelines, published in 2014, provide a framework with [five key pillars \[PDF\]](#) for how companies can ensure children's safety when they use the Internet or any associated technologies or devices that connect to it. The Guidelines also direct companies on how to advance children's rights and facilitate responsible digital citizenship, learning and civic participation. They include sector-specific checklists that recommend actions for various actors including mobile operators, ISPs, content providers and online retailers.

The LEGO Group initiated a process to implement the Guidelines, and as part of its partnership with UNICEF, the [Child](#)

Online Safety Assessment (COSA) tool was developed. It provides instructions and advice for companies working with information and communication technology (ICT) in assessing how children's rights can be integrated into their digital operations. It aims to empower companies to strengthen their child protection policies, codes of conduct and due diligence processes.

The Excel-format tool was built with inputs from a wide range of stakeholders, including ICT companies (online gaming, ISPs, mobile network operators, social media, search engines and industry associations), non-governmental organizations that specialize in child rights for the ICT sector, independent human rights consultants, academics and media experts.

The three primary objectives of the tool are to:

1. Ensure companies understand the core issues and impacts to consider when assessing their management of child rights and the Internet
2. Offer an easy-to-use and comprehensive self-assessment of a company's management of and impact on children's rights online

3. Uncover strengths and weaknesses in managing child rights policies and practices, and build corrective plans where needed to adjust management practices

What is the business case for respecting children's rights in the digital world?

The private sector has been a key driver of the digital revolution. As providers of Internet access, producers and providers of content and other digital goods, and purveyors of online goods and services, businesses are increasingly integrated into children's lives. As gatekeepers controlling the flow of information across the networks, they also have access to vast amounts of children's information and data. These roles provide businesses with considerable power and influence – and with them come heightened responsibilities. Businesses have an indispensable role to play in protecting children. They must work with governments to take down child-abuse material or other inappropriate content, raise awareness of safe and responsible Internet use, and protect children's privacy. It is not enough to preach personal responsibility – the private sector must proactively help children to guard their privacy,

such as by changing default settings and providing regular advice to users. The private sector must also lead in developing ethical technologies, with careful consideration of how they can serve children's real needs, even if that means children spend less time online.

These actions are not only the right thing to do, they are also sound business decisions. Protecting children online will become increasingly critical as powerful technologies such as artificial intelligence and immersive technologies like augmented and virtual reality become ever more integrated into children's lives. There is a risk of reputational harm for any business that is seen to be failing some of its most vulnerable customers – children. And there is also a market opportunity as consumers and the wider public place greater demands for technology services to have the right safeguards in place.

Why does the LEGO Group prioritize online child safety?

For 87 years, the LEGO Group's values of imagination, creativity, fun, learning, caring and quality have been instrumental in the company's commitment to providing the best



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play experiences with LEGO® bricks. The same values now guide the LEGO Group's ambition to deliver inspiring and safe digital experiences.

As more and more children around the world connect digitally, delivering playful experiences within safe online playgrounds has become a vital issue for the toy industry to address. Innovation in digital technology represents a tremendous opportunity for bringing playful and educational



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experiences to children around the world, but it also presents fresh challenges. Responsible brands must deliver high levels of safety while inspiring empowerment and creativity in children as they grow and develop.

Together with its partners and industry experts, the LEGO Group strives for its digital experiences to be as safe for children as its physical play materials. It was the first company in the toy industry to establish a global partnership with UNICEF, and it is committed to promoting and implementing the [Children's Rights and Business Principles](#) in its work.

Approach to internal assessment and methodology

When reviewing how to approach online child safety within the company, the LEGO Group identified the Guidelines for Industry on Child Online Protection as the best framework because of its comprehensive thematic coverage and child-rights-based approach. Using these Guidelines as the foundation, the LEGO Group partnered with UNICEF to develop the Child Online Safety Assessment (COSA) tool, which covers areas including internal governance, human resource measures, and children's privacy and empowerment. It also determines key questions to address when mapping digital child safety, and it allows the user to assign and assess relevant risks.

The COSA tool helped the LEGO Group review its operations across the business, identifying areas of best practices that could be replicated elsewhere in the company, and detecting processes that could be strengthened. The findings helped guide conversations with key internal stakeholders including senior management, operations and product development on how to ensure children's rights were protected across the entire digital network.

Through the COSA process, the LEGO Group wanted to map all existing activities across the company and identify opportunities where efforts could be improved or simplified. As part of the review, it was also important to ascertain the level of commitment and thematic awareness from management to production and marketing.

Conducting interviews with key employees, from senior leadership to those responsible for overseeing digital experiences was also crucial to the assessment process. Interviews were conducted across business areas where improvements would have the highest impact and with senior management whose support was necessary to ensure new approaches were adopted.

The company created a short interview guide based on the COSA tool structure, and all interviewees were informed that the purpose of the exercise was to highlight areas where the LEGO Group could improve and share learnings. Gaining the trust of those involved and encouraging honest feedback was of paramount importance in ensuring all potential gaps were addressed.

Key outcomes and learning

The first COSA assessment at the LEGO Group in 2016 demonstrated that the necessary processes were in place. But it also revealed opportunities to ensure greater clarity and good governance by connecting policy documents and taking a more collaborative approach across the business.

The findings resulted in a company-wide policy on digital child safety covering all areas of the business and the creation of an e-learning module for relevant employees. It furthermore indicated a need for a more comprehensive safety guidance for children and parents. The purpose of this guidance is to encourage parents to engage with their children and to support children so they can enjoy the benefits and be aware of the risks when online. Finally, the findings indicated an opportunity to strengthen the policies and frameworks used when developing digital gaming experiences, both in-house and through partners.

The assessment confirmed the belief and long-standing approach at the LEGO Group that it is vital to build play experiences for children that are 'safe by design' – with risks mitigated in the development phase, eliminating the need to add safety features later. Applying a safe-by-design approach is a core focus of the company-wide policy.

At the time of the first COSA review in 2016, the LEGO Group was developing its safe social network for children, LEGO Life. The COSA tool helped to identify key elements needed to ensure the LEGO Life experience addressed all relevant safety risks adequately.

Guidance on what to include in the app to best combat potential illegal or harmful content was highly valuable, as was the need to introduce the rules of engagement in a child-friendly manner and an intuitive reporting function.

As identified by the COSA tool, it is crucial that children are empowered and have access to the right information to help them protect themselves online. Therefore, an ongoing piece of work is to create age-appropriate safety guidance that is both insightful and contextually relevant in all digital LEGO experiences.

Advice for other companies

The COSA exercise provided the LEGO Group with a shared understanding and language, thereby helping to embed a culture of creating digital experiences that are safe-by-design. It also ensured that during the product development phase, the correct questions are being addressed and provide management with a framework to ensure the company is implementing best practices for digital child safety across the business.

A key learning with regards to methodology was the importance of gaining the trust of everyone involved, and being clear on how the findings would be used was vital to the success

of the project. It was also important to schedule the review at a time when all key stakeholders could participate and when the guidelines could be applied to develop new digital products and experiences.

The COSA exercise can be repeated as often as deemed useful. The LEGO Group has opted to perform the assessment twice a year, to establish outstanding tasks and demonstrate progress compared to the previous assessment. The visualization of progress and outstanding tasks is helpful in communicating the status across the company. Furthermore, it is an effective tool to frame the dialogue with partners, such as UNICEF, to ensure a focus on high-risk/high-impact initiatives.

RECOMMENDATIONS FROM UNICEF

The journey of the LEGO Group and the resulting COSA tool provides a model for how companies can assess its policies and operations in relation to online child safety. While business models and contexts differ, the following suggestions may be useful in enabling companies to recognize and respond to children's rights.

→ EVALUATE AND RESPOND TO RAPID DEVELOPMENTS THAT COULD AFFECT CHILDREN

Businesses should evaluate how rapid developments could pose new risks, but also how they can create new opportunities for children. Ongoing assessments are necessary to understand how new technologies and products could affect children and to incorporate appropriate measures into their operations.

→ TAKE A BALANCED APPROACH TO CHILDREN'S RIGHTS ONLINE

Companies should review both risks and opportunities, and how their operations and products can have an impact on children's rights to protection, participation and inclusion. Companies must strike a balance between children's right to protection and their rights to access to information and freedom of expression.

→ HARNESS THE GOOD, LIMIT THE HARM

Businesses should work towards ensuring that certain policies or activities intended to protect children do not infringe on children's other rights. In addition, companies can choose to apply their technologies and services to meet some of the world's toughest development challenges.

→ STEP UP ENGAGEMENT WITH ADVOCATES FOR CHILDREN'S RIGHTS

Efforts must be made to reach children and child rights advocates to minimize the risk of excluding children from stakeholder engagement processes. Advocates for

children's rights are in close contact with children and can provide expertise on children's rights in various contexts.

→ COLLABORATE WITH STAKEHOLDERS

Multi-stakeholder collaboration is crucial to establishing the foundation for safe, secure and positive uses of the Internet and associated technologies.

→ DO NOT CONSIDER CHILDREN AS A HOMOGENOUS GROUP

Access to technology and the Internet is far from global. Even in industrialized countries, children in underprivileged communities are less likely to be online. Special efforts must be made to ensure girls, children with disabilities, children in minorities, and children in remote areas, poverty or marginalized situations have equal access to digital media.

→ EMPOWER CHILDREN WITH INFORMATION ON THEIR RIGHTS IN A DIGITAL WORLD

Today's children are digital natives, but they nevertheless require guidance and support to make the most of connectivity. They do not automatically understand their vulnerability to online risks or their responsibility to be good digital citizens. Digital literacy encompasses all these areas, implying a set of competencies that goes beyond digital and technical skills. It includes the ability to search, evaluate and manage information found online; interact, share and collaborate online; develop and create content; use safety and protection features to protect themselves; manage their digital footprint; and solve problems and be creative.