Module 5: Child Online Safety Assessment
Online and Mobile Games and Application development
Learning objective and module outline

Understanding how games companies and app developers can use and get value from the Child Online Safety Assessment (COSA) tool

- Child rights games companies and app developers. Understanding the context
- An example of where online child rights impact within a typical game development value chain
- Workplace, Marketplace, Community and Supply Chain impacts, risks and responses
- Introduction to the MOCRIA tool
- Introduction to the COSA tool
- Criteria in the tool that are most relevant to games companies and app developers
- Case study - LEGO Academy - Partner training
Child rights games companies and app developers - Understanding the context

*Child rights violation risks are increasing for games companies and app developers*

- Games and applications used for play, learning, education and socialising
- Social interaction increasingly part of the online experience
- Children regularly breaching age limits for accessing social media sites
- Potential risks include:
  - Gaming, internet and app addiction
  - Data protection and privacy breaches,
  - Children accessing non age-appropriate content
  - Grooming, Bullying, Trolling,
  - Sharing of inappropriate content
  - Commercial models for games/apps targeting kids

Potential responses from games companies developers, app stores and advertising platforms include:
- Designing in safeguards for different ages
- Adopting content classification
- Age verification
- Moderation and Pre-moderation of user generated content
- Accessible grievance mechanism
- Verified parental consent
- Adopting community guidelines
- Service and pricing transparency
- CSAM Notice and Take Down procedures
- Education and information provision
How are children impacted by companies developing online/mobile games companies and applications?

Example value chain of a gaming company in context of impacts focusing on marketplace

The overall ‘Blueprint’
Storyline and storyboards.
Design document: game's goals, levels, settings and designs, characters, plot gameplay mechanics

Pre-production
Producers, Artists and Writers
Assistant Producers, Designers, Programmers,

Production
Production team schedules, concept retention/QC, Licensing, Marketing plan, Coding of library engine, 2D/3D and artificial intelligence

Game play and moderation
Producers, Assistant Producers, Designers, Marketers, Programmers, Animators, Artists
Alpha version Beta version, Testing, Bug fixing, Standards and compliance checking, Approval

Post Production
Production
Producers, Assistant Producers, Designers, Marketers, Programmers, Animators, Artists

Sales and distribution
Upload and host (or manufacture)
Producers, Assistant Producers, Marketers, Programmers, Animators, Artists

Game play and moderation
Moderators, Game administrators, Players, Gaming Community

Game promotion, Marketing, Advertising, Sales, Social media

Upload and host (or manufacture)
Server administrators, data centres, Players

Hosting on dedicated servers, listen servers, peer to peer environment

Original idea/
Adapt a current concept
Concept
Designers, Planners, Creative, Partner account managers

Play and feedback, Moderation Community development

Key: Black writing - business activities, Purple writing - relevant roles, - potential intervention points
Key ways businesses can promote children’s rights in the workplace

Impact Areas
- Family-friendly workplaces
- Preventing child labor
- Preventing company facilities and equipment being used for child right violations
- Respecting rights of young workers and caregivers
- Ensuring protection and safety of children at workplace and across network operations

Risks
- Decreased brand reputation
- Child not in education, risks of injury, to health and of exposure to immoral activities
- Problems recruiting and retaining skilled workforce, including mothers and carers
- Fines and loss of license to operate
- Inefficient and/or underqualified employees.
- Costs to train new staff, down time due to accidents

Response
- Establish living wage, adequate sick leave
- Enable young workers to continue education
- Worker age-verification
- Health and safety
- Family-friendly work environment, e.g. childcare facilities
- Prevent discrimination including during pregnancy and maternity
- Codes of conduct, training and contingency planning
Marketplace

Ensuring healthy, positive and appropriate products and marketing for children

Impact Areas
- Ensure products and services promote and protect child rights in use
- Ensure responsible marketing and advertising which does not infringe on child rights
- Use of communication to support and advance children’s rights

Risks
- Violating rights of children, including cyberbullying, child sexual exploitation
- Child safeguards are not adequately applied across product value chain
- Missed opportunity to design child safety features / protection of child rights into products
- Missed opportunity for innovation
- Children misinterpret promotional messaging / make ill-informed decisions

Response
- Follow national/international laws/regulations
- Reduce health/safety dangers from unintended use of products
- Assess risks due to unintended use of products/services
- Ensure consent of parents and children for purchases and use
- Establish responsible marketing/advertising policy
- Promote healthy behaviours and products
- Accessible complaint mechanism
## Community

*Managing community impacts of operations, networks, products and services*

### Impact Areas

- Respecting children’s rights in regards to environment and land acquisition and use
- Respecting children’s rights in security arrangements
- Protect children affected by emergencies
- Reinforcing government and community child rights initiatives

### Risks

- Health/safety impacts on children as a result of product and network (e.g. emissions, water toxicity)
- Poor relations, lack of trust with community members / Loss of license to operate
- Products/services facilitating exploitation of children in the community
- Child adversely impacted by emergencies or in security arrangements

### Response

- Monitor environmental impacts of operations
- Select and train security personal on basis of child rights
- Consult community regarding interaction with children
- Ensure any relocation upholds rights of families / children
- Community / regional level child rights impact assessments
- Collaborate with community stakeholders to develop educational campaigns on responsible ICT use
Supply Chain

Ensuring children rights are protected throughout a company’s supply chain

**Impact Areas**
- Ensure workplace rights are upheld by suppliers and subcontractors
- Eliminate any potential sources of child labour or other exploitation of children by suppliers/contractors
- Ensure suppliers products are safe and meet international health and safety standards

**Risks**
- Impacts to children within supply chain (e.g. child labor, exploitation)
- Misalignment of corporate policies and those of suppliers leading to child rights violations
- Lack of knowledge by suppliers on how to identify / mitigate child rights impacts/risks
- Suppliers operating in conflict zones
- E-waste leading to hazards in collection and processing

**Response**
- Introduce supplier code of conduct
- Build children’s rights into selection, review and training of suppliers
- Avoid making demands of suppliers that could result in child labor
- Monitor / audit suppliers regularly to ensure alignment with corporate policies
- Identify high risk suppliers and work with them to identify/improve any child rights impacts
- Introduce complaint mechanism
Introduction to the CRiA Tool

Working with industry, experts, NGOs and other partners UNICEF has developed a tool that can be used for child rights due diligence

Developed in 2015, initially for mobile operators, based on leading human rights & child rights guidelines, the tool offers:

- An understanding of challenges, opportunities and child rights impacts
- Guidance on how to mitigate potential negative impacts and promote positive impacts
- An easy-to-use and comprehensive self-assessment framework to analyse and manage potential and actual impacts on child rights
- Understanding of strengths and weaknesses in managing child rights within the company’s value chain
- Valuable feedback to develop plans and training programmes to enhance child rights management within the organization

Based on initial work by: DNV-GL
Introduction to the Child Online Safety Assessment Tool

The tool consists of a guidance document and an xls assessment mechanism structured by business departments

- The PDF companion guide
- Used in the assessment preparation, completion and for action planning
- The Excel-based questionnaire
- Designed to make it easy to:
  - Assess your performance against the criteria
  - Store the results and related evidence generated during the self-assessment
  - Complete a risk assessment
  - Create a prioritized action plan assigned to individuals

Example screenshot below:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment Criteria/Indicator</th>
<th>Result</th>
<th>Status and Evidence</th>
<th>[Optional] Risk (High, Medium, Low)</th>
<th>[Optional] Priority (High, Medium, Low)</th>
<th>Party Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1.1</td>
<td>Policies on user-generated content</td>
<td>The company has adopted policies regarding ownership of user-generated content, including the option to remove user-created content at the user’s request. The company removes content.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Relevant criteria in the COSA xls tool

The Legal team is responsible for ensuring corporate policies and management processes comply with applicable legislation.

- Policies and procedures for handling Child Sexual Abuse Material (CSAM)
- Policies on user generated content
- CSAM filtering and blocking
- CSAM reporting mechanism and access to hotlines
- Notice and takedown procedures
- Procedures for recording and retaining evidence
- Processes to ensure non-complicity in restrictions on legitimate activities
- Terms and Conditions of use prohibit storing, sharing or distribution of CSAM
- Prevention of misuse of payment services for illegal purposes
Relevant criteria in the COSA xls tool

The Human Rights and CR team coordinate the integration of child rights considerations into all appropriate policies and management processes.

• Setting and implementing child safeguarding policies and procedures
• Understanding child rights impacts and associated risks to the business
• Engagement and consultation of internal and external experts
• Developing metrics to monitor and evaluate performance
• Ensuring reporting mechanisms regarding potential child rights violations are accessible and easy to use
• Communicating status to senior executives and publically
• Aligning any corporate social responsibility programs so they support national development goals, education and access to ICT’s
The Human Resources team works to ensure all employees are aware of child rights and exhibit appropriate behaviours

- Checking records of potential employees who may work with children to confirm they will not be a risk to children
- Ensuring all employees in roles that involve interaction with or the protection of children participate in targeted training on child safety
- Documenting and maintaining a training record
- Ensuring the company’s code of conduct for employees includes provisions that explicitly forbid accessing CSAM and other illegal behaviour
- Establishing a process for supporting employee wellbeing if their role exposes them to CSAM or other child rights violations
Relevant criteria in the COSA xls tool

The procurement team is responsible for working with suppliers to align values, expectations and performance regarding child rights

- Conducting due diligence on suppliers to identify if there are any prior performance concerns
- Evaluating risks and impacts in relation to supplier selection and review
- Ensuring supplier contracts incorporate the same requirements and standards for safeguarding children as the company’s policies and codes of conduct
- Ensuring all supplier employees in roles that involve interaction with or the protection of children participate in targeted training on child safety
- Documenting and maintaining a training record
Relevant criteria in the COSA xls tool

*Product development teams are responsible for creating and maintaining safe and age-appropriate online environments*

- Ensuring that customers/parents and users/children understand safe online behaviours and controls
- Developing and applying community guidelines, an acceptable use policy and/or house rules for appropriate use of interactive services
- Taking different age groups into account when developing products and services and using characters and features to promote child rights
- Establishing age-verification and sign-on processes to determine whether users are old enough to access the content or service
- Using verified parental consent for data collection and sharing
- Moderating chat, image sharing, discussion groups and message boards
- Encouraging a ‘self-regulating’ approach where users take responsibility for encouraging good behaviours
- Promoting helplines in local, age appropriate language
Relevant criteria in the COSA xls tool

Commercial teams are responsible for ensuring marketing, sales, products and services promote child online safety

- Providing transparent and clear customer information about the nature of the services that are offered, age restrictions and pricing
- Including a classification or age rating system to guide users, parents and teachers
- Advertising, marketing and promotions are clearly identified as such, with limits to advertising to children
- Complying with any legislation or international best practice in relation to collecting, using or disclosing personal identifiable or location information
- Ensuring any business partners work to the same standards as the company
Case Study – LEGO Academy - Partners training

LEGO identified that game development and marketing partners in local markets may not be fully aware of LEGO's child right’s policies and procedures so it acted

Founded in 1932, LEGO, is one of the world's leading manufacturers of play materials including the LEGO brick.

Its mission is to \textit{Inspire and develop the builders of tomorrow}

- LEGO’s online presence is growing and becoming more sophisticated
- Risk of potential violations were identified with business partners
- It collaborated with a key business partner in India to develop the LEGO Academy
- LEGO now expanding the program

- Policies, procedures and practices were updated and thorough
- However, partners may not have adequately considered impacts on children, exposing the company and users to risk
- The training program helped ensure any child online safety is designed in and compliant with policy