



Children’s Rights and Wellbeing Manifesto

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Introduction

Leadership position

[The rights of every child must be respected, protected, and fulfilled in the digital environment as in the physical world.](#) Innovations in digital technologies affect children’s lives and their rights in ways that are wide-ranging and interdependent, even where children do not themselves access the internet. Advertisers and brands should seek to advertise in a way that is sensitive to these unique needs both online and offline.

The problem

[A 2022 study](#) concluded that nearly \$11 billion in ad revenue is generated annually by social media platforms from US-based users under the age of 18. [In 2017](#) it was estimated that ad tech companies hold an average of 72 million data points on a child by the time they turn 13. Beyond key ethical and child rights issues such as consent, agency and privacy, this [datafication can have significant consequences for a child’s development.](#)

Children’s wellbeing faces [4Cs of risk: content, contact, conduct and contract.](#) These risks range from advertising practices jeopardising corporate brand safety to those illegally targeting children. Examples include [targeted adverts promoting unhealthy eating habits and body dysmorphia](#), [social media content sexualising minors with corporate advertisements](#), [harmful data processing and exploitative practices](#), and illegal adverts targeted at children for products such as [vaping](#), and [gambling](#), exacerbating these issues.

Children’s internet safety relies on the existence of trusted relationships between online platforms, children, parents/guardians and legislative frameworks, but it is essential that advertisers understand their role in navigating this.

Commercial Imperative

[Ensuring and respecting child rights and wellbeing not only contributes to enhancing a company’s reputation](#) but also strengthens risk management and investor confidence in ethical business practices. This commitment extends to all stakeholders, from employee morale to suppliers, ensuring adherence to these standards for a more stable and reliable business environment.

Alongside the ethical reasons for adhering to children’s rights and wellbeing standards, there is also a commercial imperative. Adherence to legislative frameworks and systems for best



practice helps to manage risks to the business against fines. [Developing trust and ethical standards as a brand are more crucial than ever, particularly for Gen Z.](#)

Who is this intended for?

This document is directed towards advertising practitioners within agencies and brands. While the [Conscious Advertising Network \(CAN\)](#) does operate a free-to-join membership structure, this resource is freely available for all brands and agencies to use.

Our goal is for all clients and brands to include the CAN manifestos in all agency briefs and marketing request for proposals (RFPs). It is also to create ongoing conversations between civil society groups and tech platforms, media owners, publishers, and brands, based on our manifestos.

If children are your primary audience, you should ensure that child safety is a brand priority, rather than a function or a discipline within a business department.

You might not be marketing directly to children, but you should still consider children in your marketing plans if you are advertising on services likely to be accessed by children. This is also relevant for brands or advertisers that don't target children. Even if your brand is advertising solely in adult-oriented media, it remains essential to prioritise children's safety and privacy considerations.

How to use the manifesto

Unlike legal frameworks, this document sets aspirations for organisations to work towards. When working with members, we support them on their journey towards conscious advertising rather than expecting immediate perfection.

In line with the [United Nations Convention on the Rights of the Child \(UNCRC\)](#), we recommend that you define a child as under 18 when designing marketing and advertising plans.

We have divided the document according to six principles that are inspired by the eleven principles of [Child Rights by Design](#) from the [5Rights Foundation](#).

Accompanying this manifesto is the member tracker which charts progress against many of the different asks within the document. We have also highlighted case studies and provided a checklist to support that journey.

Acknowledging the input of partner organisations

Finally, we would like to acknowledge the input of leading individuals and organisations from across civil society and the advertising industry who have helped shape this document. This



has helped us ensure that the advice contained within the manifesto reflects leading global actionable advice for advertisers.

A total of 40 individuals and organisations participated in the consultation process to gather expert opinions for creating the manifesto. This process included surveys, online and in-person workshops, roundtables, and one-to-one interviews.

Organisations

Omnicom Media Group UK

NSPCC

Barnardo's

SuperAwesome

Eurochild

5Rights Foundation

Individuals

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Guiding Principles

Principle 1: Safety-by-Design - Embed safety-by-design in the development and distribution of advertisements

We advocate for safety-by-design because we believe the advertising industry should always ensure processes and decision-making has at its heart the principle of reducing the risk of harm to those who use it. Safety-by-design is preventative; it puts user safety throughout, rather than in response to harm.

This is what we are aiming for:

- We recommend that brands and agencies produce an ‘Advertising to Children’ guide which outlines a best-practice approach based on the six principles laid out within the manifesto.
 - Ensure someone in the organisation is nominated with responsibility for brand safety and ethical practice.
 - Understand your context as an advertiser and how likely children are to come into contact with your marketing.
 - Include the [Global Alliance for Responsible Media \(GARM\)’s Brand Safety Floor + Suitability Framework](#). However, you should also ensure your approach to brand safety goes beyond adjacency to consider whether policies, enforcement and transparency are consistent with your brand site/platform wide.
- Make sure your approach to brand safety does not have an overreliance on outsourced tools. Conscious media should mean proper oversight.
 - Working with a reputable third-party brand safety and brand suitability partner can help with brand safety measures. If you or your digital media agency/vendor is using a brand safety tool, make sure you have checked its efficacy and that it meets your own requirements against your organisational values.
 - Speak to your media agency about your organisation’s values and approach to brand safety to help them to make decisions that are in line with these.
- Closely review any new platforms in your media plans, considering brand safety and whether they align with your values and embed safety-by-design, especially if they are likely to be accessed by children. Consider requiring platform adherence to the industry



standards such as the [IEEE 2089 -2021 Standard for an Age Appropriate Digital Services Framework](#) based on the 5Rights Principles for Children.

- Examine resources such as the [Media Responsibility Index](#) and [Social Media Safety Index](#) to understand more about how the platforms are accountable and comply with the key legal frameworks that protect children online.
- Develop a carefully vetted inclusion list.
 - As a brand, work with your agency to ensure the inclusion list is in line with your values. Ensure your brand strategy encourages inclusivity.
- Review blocklists and brand safety processes regularly to ensure your advertisements are not funding platforms or websites that are harmful to children.
 - If you have an ethical supplier policy, consider including a threshold for exclusions for websites and platforms that are repeat offenders.
- Ensure your understanding of harm focuses on illegal harm but also takes into account legal but harmful content as well as systematic risks covered by legislation such as the [Online Safety Act \(OSA\)](#) or the [Digital Services Act \(DSA\)](#).
 - Avoid targeted advertising for children that promotes unsafe or age inappropriate products and services, e.g., gambling, loot boxes, tobacco, alcohol, films, pornography, and games aimed at adults.
 - Ensure that your advertising does not exploit insecurities such as unhealthy body images of children, young people and vulnerable groups.
 - Advertisers should evaluate media platforms' efforts to prevent hate speech, bullying, mis/disinformation, extreme, and other harmful content, particularly by using and developing AI tools that can screen content before it is published publicly, as well as to ensure a high level of safety, privacy and security by design and default for children.

Principle 2: Responsible Practice – Comply with legal frameworks and conduct a Child Rights Impact Assessment

We advocate for the advertising industry to recognise and adhere to international standards, national laws, regulations, industry standards and other relevant measures.

This is what we are aiming for:

- Comply with existing legal frameworks such as the [UK Online Safety Act](#), [EU Digital Services Act](#), [Australia Online Safety Act](#), UK Advertising Standards Authority's (ASA)



[Code of Non-broadcast Advertising \(CAP Code\)](#), [Code of Broadcast Advertising \(BCAP Code\)](#), [Advertising Guidance](#), [USA Guidelines of the Children's Advertising Review Unit \(CARU\)](#), and [General Data Protection Regulation \(GDPR\)](#).

- Familiarise yourself with the advice of the regulations relevant to your jurisdiction.
- Follow the [ASA guidance](#) outlined for children if targeting 'family-oriented' content.
- Adhere to the Codes of the Online Safety Act or relevant regional legislation, particularly on preventing illegal harm and the protection of children.
- Regular monitoring and sampling should be built into the system to ensure that advertising practices align with overarching legal parameters.
- Consider conducting regular [Child Rights Impact Assessment](#) and [Human Rights Impact Assessment](#) before the distribution or implementation of digital products or services to mitigate potential impacts on children. Ensure that platforms likely to be accessed by children have conducted child data protection and/or child rights impact assessments in compliance with legal requirements and best practice industry standards.
- Where you see practice or content which is in breach of legal or other industry standards frameworks you should ensure this is reported to a legal or compliance officer internally and/or to regulatory authorities.

Principle 3: Age Appropriate - Develop and place advertising that is age appropriate by design

We advocate for the advertising industry to carefully adapt to the children's age range and diverse developmental stages, ensuring that data collection and usage align with appropriate levels of protection. It should reflect the technological development in this area, such as artificial intelligence or virtual reality. Consider implementing age assurance measures for high-risk products or services, rigorously test their efficacy and safeguard children's privacy and rights.

This is what we are aiming for:

- In line with the UNCRC, we recommend that you define a child as under 18 when designing marketing and advertising plans.



- When your advertising collects and uses data, profiling, or targeting aimed at children, adhere to the Information Commissioner’s Office (ICO)’s [Age Appropriate Design Code](#) or [relevant geographical code](#).
 - Avoid microtargeting and the use of dark patterns or persuasive techniques in any advertising that could reach children.
- While frameworks and advertising codes may not explicitly mention new and evolving forms of technology, you should consider how they are covered under the principles of existing guidance.
 - For example, when working with content generated by AI, adverts featured within virtual reality, or embedded in gaming platforms, it is important to consider the risks related to profiling children’s information or whether the platform or content is appropriate for the audience you are targeting.
- Age inappropriate adverts should not be placed in environments where it is difficult to establish the age of users. When placing adverts in places such as gaming platforms, social media platforms, out-of-home marketing and set top boxes consider a) whether they are likely to be seen by children b) if the content is appropriate to be aimed at children c) how robust their age verification systems are.
 - Work with audience verification vendors to understand the composition of desired channels.
 - Ensure that you have assessed how robust the age verification system in place for a website or platform is. [According to research commissioned by Ofcom](#), a third of children aged between 8 and 17 with a social media profile have an adult user age after signing up with a false date of birth while amongst the 8 to 12 age group, the study estimated that two in five (39%) had a user age profile of a 16+ year old.
 - Avoid using platforms that do not have an age verification system in place, since they may be less equipped to accurately identify and safeguard children.
 - Work with a child-safe technology platform to ensure safe, digital engagement that is able to produce pre-bid segments excluding children-appealing content without requiring extensive data collection.
 - Do not use digital measurement plans for digital campaigns targeted to children under the age of 13 (or higher, as applicable in the market).
 - Use sophisticated targeting mechanisms, such as combining age verification targeting with interest targeting, to help reduce exposure to age inappropriate advertising or age restricted products (HFSS, also known as High in Fat, Salt and Sugar, alcohol, gambling).



- Ensure that family-oriented environments, such as OOH advertisements during sports events, avoid featuring age inappropriate content such as adverts for gambling or alcohol.
- Consider the potential unintended consequences of age verification such as access to information and privacy. These systems must align with data protection and safeguarding standards. Consider requiring platforms that use age verification to demonstrate the system's adherence to industry standards such as the [IEEE 2089.1-2024 Standard for Online Age Verification](#).

Principle 4: Agency - Support child users' decision-making and reduce exploitative features and business models that harm their agency

We advocate for children's autonomy in navigating the digital environment. Children should have the freedom to initiate and finish their interactions with digital platforms at their own will, feeling empowered to explore without fear of missing out. It means they understand what they have agreed to without being coerced or influenced into affecting their safety, privacy, growth, or overall welfare.

Please see the [CAN Informed Consent Manifesto](#) to understand more about the steps you can take to embed privacy in your advertising.

This is what we are aiming for:

- Enhance transparency by prominently labelling sponsored or promoted content within product placements, ensuring clear differentiation from authentic, user-generated (organic) content.
 - Consider adding express references to the brand by incorporating age appropriate visual cues and icons to account for literacy at different stages of development. This will make it clear to the audience that this is a promoted product placement and helps strengthen trust with the brand.
 - Encourage the use of easily recognisable and consistently applied [industry-wide standardised](#) labels for different types of audio-visual commercial content.
 - Ensure that ad placement choices can be justified, particularly in new ad formats.
 - i. ad placement justification: have solid reasons for selecting specific locations or platforms to display ads.



- ii. risk management: "justified" encourages advertisers to assess the potential risks and benefits associated with new ad formats (e.g., audience receptiveness, potential impact on brand perception, and alignment with overall marketing objectives).
 - iii. evaluation: measure and evaluate the performance of ads placed in unfamiliar & untested formats.
- If any content within your advert is AI generated it should be clearly and accessibly labelled so that your audience, including any children, can reasonably be expected to understand it.
- Consider the nature of content from influencers, including their reputation, target audience and whether they are suitable role models for your brand or product.
 - Review influencers' appeal to a younger audience by conducting a demographic analysis of their social following and evaluating the quality of their engagement practices to ensure they meet safeguarding and due diligence standards.
 - Ensure a substantial audience of the influencer's following are not "children" (under 18), unless the campaign has a positive message that respects their wellbeing.
 - When using influencers that include children within their target audience, utilise language that can be easily understood by the audience. Tailor the language and messages for both comprehension and cultural sensitivity, ensuring inclusivity and avoiding stereotypes and discriminatory language.
 - If you are working with influencers under the age of 18, conduct an [internal risk assessment](#) to consider the impact of a digital workload on child influencers' economic, social, psychological, and physical wellbeing.
 - Find advice about working with under 18s look to the advice from the National Network for Children in Employment & Entertainment (NNCEE), their resources can be used to [conduct an internal risk assessment](#).
 - Ensure suitable safeguarding policies are in place within your organisation, but also within any contract held with a parent or guardian.
 - Remember that, irrespective of parental authority or parental contact and contracts, safeguarding the child should be fundamental.
- Turn off behavioural advertising that targets individuals under 18 based on their web-browsing behaviour, which displays highly relevant ads and personalised marketing messages.
- If using contextual advertising for under 18:



- Use custom contextual pre-bid filters by known verification vendors. Set appropriate brand safety and suitability filters in accordance with clients' risk-tolerance.
- Leverage contextual advertising options (Interactive Advertising Bureau Tier 1 and 2 categories) in Demand Side Platforms (DSPs).
- Use existing contextual solutions in DSPs to target away from kid and family directed context.
- Procure and/or vet an inclusion list of domains and apps which do not target children.
- Consider the [cumulative risk of algorithmic adverts](#) and the [constant bombardment of advertising](#) that young people often experience. This can lead to unhealthy consumption habits and exacerbates stress, anxiety, and feelings of inadequacy among young people contributing to mental health issues such as low self-esteem.
 - Avoid using children's personal data for automated decision-making in advertising.
- Avoid exploiting children's vulnerabilities, paying attention to ASA's regulations regarding '[Credulity and unfair pressure](#)' as well as CAN's [Anti Ad-Fraud manifesto](#). Note that legislation such as the EU's AI Act prohibits all AI systems that exploit the vulnerabilities of age.
- [Consent is important for children](#); however, it must take into consideration their maturity, context and wellbeing.
 - Make reasonable efforts to ensure that anyone who provides their own consent is at least 13 years old or of age as required by legislation in force.
 - Adapt Informed consent procedures to the age and maturity, context and wellbeing of the target audience.

Principle 5: Privacy - Embed privacy-by-design and data protection in marketing development and distribution

We strongly advocate for transparency within the advertising industry, ensuring clear disclosure of how children's personal information is utilised and processed. This information should be presented in an accessible way for children to find and understand. Moreover, ensure a high level of data protection for all individuals under 18, with utmost care taken to protect their privacy and prevent exposure of their information.



Please see the [CAN Informed Consent Manifesto](#) to understand more about the steps you can take to embed privacy in your advertising.

This is what we are aiming for:

- Ensure that all children are offered the highest available standards of data protection, in line with [UNCRC General Comment 25](#) and [international best practice for data protection](#).
 - This should be applied consistently over all jurisdictions where the service is operated, even where national laws do not strictly require this.
 - For examples of international best practice for data protection look to the DSA and GDPR as well as the UK Age Appropriate Design Code.
- Unless there is a compelling reason to use profiling (e.g., age assurance), collection and recording personal data for individuals under 18 should be turned off by default.
 - Collecting geographical, demographic, gender, and behavioural data across sites to retarget under 18 are strictly prohibited. This is particularly important for the collection of behavioural and personal data.
 - Businesses may collect and record personal data to verify age, in accordance with data protection principles including purpose restriction and data minimisation.
 - Collect and retain only the minimum amount of personal data necessary to provide the elements of a product or service, in accordance with data minimisation principles.
- Refrain from the 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.
- Practices that rely on neuromarketing, emotional analytics, immersive advertising, and advertising in virtual and augmented reality environments to promote products, applications, and services under 18 should also be avoided.
- AI-created advertising should not infringe on children’s privacy through data collection and use.



Principle 6: Diversity, Equality & Inclusion – Be inclusive, treat everyone fairly and provide for diverse needs and circumstances

We endorse promoting equality and diversity for all children across content, conduct, contact and contract. Advertising shapes beliefs and behaviours, and diverse marketing messages positively impact children and youth. Stereotyping in advertising harms children’s confidence, aspirations, and health. It restricts opportunities, particularly for marginalised children. Advertising industry should promote positive representation by marketing products and content designed for children.

Please see the [CAN Diversity, Equality & Inclusion Manifesto](#) to understand more about the steps you can take to embed equality and diversity in your advertising.

This is what we are aiming for:

- Avoid perpetuating stereotypes or glamourising negative lifestyles in the creation of advertising content or through your ad placement.
 - Advertisers should be mindful that their campaigns may create polarised cultural discourses and even encourage hate speech. Brands and advertisers should assess the societal impact of their marketing communications. Consult industry specialists, consultants, civil society, and representative groups to conduct these assessments if your company lacks internal capacity or expertise.
 - Advertising algorithms should not be designed or tailored based on stereotypes related to protected characteristics.
 - Advertising content should never reinforce cultural or societal biases that could harm or discriminate against children, with particular attention to the most vulnerable children (e.g., girls only playing with dolls, boys only playing football).
 - Avoid promoting unrealistic beauty ideals or extreme dieting practices to children and young audiences, regardless of gender.
- [Encourage the representation of diverse perspectives and cultures in advertising content](#), promoting inclusivity, and helping children develop a broader worldview.
 - Include a diverse variety of positive role models throughout all advertising to offer a realistic and representative reflection of society.
 - [Consider all accessibility impairments](#), including visual, auditory, cognitive and motor challenges, to embrace and embed authentic representation.
 - Promote positive messaging and values throughout campaigns (e.g., promote diverse body types and body positivity in ad campaigns.)



- Consider whether your advertising might be targeted by trolling and how you can support colleagues, models, or creators. See advice from [We Are Social](#).
- Use licensed characters and celebrities popular with children with a due sense of responsibility.
 - Advertisers may use brand equity characters, created by them, to promote the products they were designed to sell. There are specific points around this for certain categories in the [ASA BCAP Code](#).