

Custorian – Policy Brief

A standardised child safety framework for digital platforms | April 2026

The Gap

No shared, auditable standard exists for child digital safety. Regulators across the EU, UK, and US are enacting ambitious laws — the Digital Services Act, AI Act, UK Age Appropriate Design Code, Denmark’s Under-15 Law — yet platforms have **no standardised framework** to comply against and no independent mechanism to verify claims.

The result: platforms grade their own homework.

- **36.2 million** CSAM reports submitted to NCMEC in 2023 — a 12% year-on-year increase
- **0 major platforms** publish independently audited child safety metrics
- The DSA mandates systemic risk assessments (Art. 34–35) but prescribes no methodology for child-specific controls
- National DSA coordinators lack a common benchmark to evaluate platform compliance

The payments industry solved an identical problem with PCI DSS. Sustainable electronics solved it with EPEAT. Child safety has no equivalent — until now.

The Standard: Custorian Controls Framework (CCF)

The CCF defines **6 domains and 90+ auditable controls**, each marked **Required** or **Addressable**:

Domain	Controls	Scope
1. Age Controls	14	Age verification, estimation, gating
2. Content & Design Safety	18	Algorithmic safeguards, dark patterns, ad targeting
3. Data & Privacy for Minors	16	Data minimisation, retention, profiling restrictions
4. Parental Rights & Child Agency	12	Consent models, transparency, age-appropriate autonomy
5. Monitoring, Detection & Response	17	CSAM detection, reporting pipelines, incident response
6. Governance & Policy	15	Board accountability, safety-by-design, staff training

Aligned with **IEEE P3462** (Safety by Design for GenAI to Prioritize Child Safety).

Regulatory Cross-Map

Regulation	Jurisdiction	CCF Domains Addressed
DSA Article 28 (minor protection)	EU	1, 2, 3, 4
DSA Article 35 (risk mitigation)	EU	All 6
EU AI Act (high-risk AI)	EU	1, 2, 3, 5
UK Age Appropriate Design Code	UK	1, 2, 3, 4
Denmark Under-15 Law (2027)	DK	1, 2, 3, 4, 6
COPPA / KOSA	USA	1, 3, 4
Jutland Declaration (Odense, 2025)	DK / EU	All 6

Compliance Model: Tiered by Risk

Modelled on PCI DSS merchant levels — platforms are tiered by minor user count:

Level	Minor Users	Validation Method	Example Platforms
Level 1	>1 million	Annual QSA audit + quarterly scans	Meta, TikTok, YouTube, Roblox, Snapchat
Level 2	100K – 1M	QSA audit or Self-Assessment Questionnaire	Discord, Twitch, BeReal
Level 3	10K – 100K	Self-Assessment Questionnaire	Regional social apps, ed-tech
Level 4	<10K	Simplified Self-Assessment	Niche apps, startups

Qualified Safety Assessor (QSA): Independent auditors certified by Custorian to conduct Level 1–2 assessments. Certification programme launching Q3 2026.

“**Custorian Certified**” attestation granted upon successful audit — publicly verifiable, time-limited (annual renewal), revocable.

The EPEAT Precedent: Why This Model Works

EPEAT (Electronic Product Environmental Assessment Tool) was seeded by the **US EPA** in 2006 as a voluntary standard for sustainable electronics. Today it is **mandated by 40+ governments** in procurement policy — manufacturers pay to certify, which funds the standard’s maintenance.

Custorian follows the same path:

- **Government-referenced standard** — Denmark’s Under-15 Law (effective 2027) and the Jutland Declaration (signed Odense, 2025) create the first regulatory gravity
- **Platform certification fees** fund independent operation — no dependence on the platforms being assessed
- **Procurement leverage** — once governments require “Custorian Certified” in public-sector platform procurement, market adoption accelerates
- **Open framework, controlled mark** — CCF is CC BY-SA 4.0; the “Custorian Certified” trademark ensures audit integrity

About Custorian

Non-profit Danish forening | CVR 46399455 | Odense, Denmark

- Framework licensed **CC BY-SA 4.0** — open for adoption, adaptation, and translation
- “**Custorian Certified**” trademark registration in progress (EUIPO)
- **Advisory Council forming:** ECPAT International, Internet Watch Foundation (IWF), Datatilsynet (Danish DPA), 5Rights Foundation (*applications in progress*)
- **Technology partnerships:** Microsoft PhotoDNA, Thorn Safer (*applications in progress*)

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