

# CUSTORIAN

THE CHILD DIGITAL SAFETY STANDARD

## Self-Assessment Questionnaire

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SAQ-C: Full Framework Assessment  
For platforms with messaging AND user-generated  
content

Version 0.1 (Draft)

Based on Custorian Controls Framework (CCF) v0.1

Foreningen Custorian (CVR 46399455)

[custorian.org](https://custorian.org)

Document classification: Confidential when completed

# Instructions

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## Purpose

This Self-Assessment Questionnaire (SAQ-C) is the full-framework assessment instrument for platforms that support both direct messaging and user-generated content (social media, gaming platforms, community apps). It covers all ~90 controls across 6 domains of the Custorian Controls Framework.

## Who Should Complete This

SAQ-C applies to platforms classified as:

- **Level 2** (100K – 1M monthly active minor users) – as an alternative to a full QSA audit
- **Level 3** (10K – 100K monthly active minor users) – primary validation method
- **Level 4** (<10K monthly active minor users) – may use SAQ-C or the simplified SAQ

**Level 1 platforms** (>1M monthly active minor users) must undergo a full Report on Compliance (ROC) by a Qualified Safety Assessor (QSA).

## How to Complete This Questionnaire

For each control listed in this document, assess your platform’s current implementation status and provide supporting evidence.

## Control Types

**Required** – The platform **MUST** implement this control to achieve Custorian compliance. There is no alternative. Failure to implement a Required control results in a non-compliant finding for that control.

**Addressable** – The platform must assess this control and either: (a) implement it as specified, (b) implement a compensating control that meets the intent, or (c) document why the control is not applicable with supporting justification. Addressable does **NOT** mean optional.

## Status Definitions

STATUS	MEANING
In Place	The control is fully implemented, operational, and supported by documented evidence.
Partial	The control is partially implemented. A remediation plan with target date is required.
Not in Place	The control is not implemented. A remediation plan with target date is required.

STATUS	MEANING
N/A	The control is not applicable to this platform. Written justification is required. N/A is only valid for Addressable controls or where the platform does not offer the feature the control addresses.

## Evidence Requirements

For each control marked “In Place” or “Partial,” provide evidence in the Evidence/Notes column. Acceptable evidence includes:

- Policy document references (with version and date)
- Configuration screenshots or system settings
- Audit log samples
- Test results and accuracy metrics
- Third-party assessment reports
- Architecture diagrams

**Important:** Marking a control “In Place” without adequate evidence may result in the assessment being rejected during validation. Level 1 and Level 2 platforms will have their SAQ validated by a Qualified Safety Assessor.

## Platform Information

<b>Platform Name</b>	
<b>Platform URL</b>	
<b>Parent Company</b>	
<b>Monthly Active Minor Users</b>	
<b>Platform Level (1/2/3/4)</b>	
<b>Maturity Tier (1/2/3/4)</b>	
<b>Platform Type</b>	Social Media / Gaming / Messaging / Community / Education / Other: ___
<b>Jurisdictions Served</b>	
<b>Languages Supported for Minors</b>	
<b>Assessment Date</b>	
<b>Assessment Period</b>	From: _____ To: _____
<b>Assessor Name</b>	
<b>Assessor Title</b>	

<b>Assessor Email</b>	
<b>Child Safety Officer (CSO)</b>	
<b>CSO Email</b>	

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# Domain 1: Age Controls (CS-AC)

Ensure platforms accurately identify, verify, and appropriately serve minor users.

## CS-AC.1 – Age Determination

Platforms must implement reliable mechanisms to determine user age before granting access to features or content.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-AC.1.1	Implement age gate at account creation using verifiable methods (not self-declaration alone for high-risk features)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.1.2	Re-verify age when user attempts to access age-restricted features or content	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.1.3	Maintain age determination accuracy records and report false positive/negative rates quarterly	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.1.4	Support multiple age verification methods (document, biometric estimate, third-party attestation, parental confirmation)	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.1.5	Age verification data must not be retained beyond the verification event	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## CS-AC.2 – Age-Appropriate Experiences

Platforms must differentiate experience, defaults, and capabilities based on verified age.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-AC.2.1	Default all accounts identified as minors to highest privacy settings	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.2.2	Disable behavioral advertising for users under 16	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.2.3	Disable algorithmic recommendation of harmful content categories for minors (self-harm, eating disorders, violence, sexual content)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.2.4	Implement age-differentiated content moderation thresholds	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.2.5	Provide age-appropriate language in all user-facing communications to minors	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## CS-AC.3 – Age-Gated Features

High-risk features must require verified age before access.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-AC.3.1	Direct messaging with unknown users disabled by default for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.3.2	Location sharing disabled by default for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.3.3	Profile discoverability restricted to approved contacts by default for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.3.4	In-app purchases require parental authorization for users under 16	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-AC.3.5	Live streaming restricted for users under 16 unless parental opt-in	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## Domain 2: Content & Design Safety (CS-CD)

Ensure platform content, design patterns, and algorithms do not endanger minors.

### CS-CD.1 – Harmful Content Detection

Platforms must detect, flag, and act on content harmful to minors.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-CD.1.1	Implement automated detection for CSAM using industry-standard hash matching (PhotoDNA, Thorn Safer, or equivalent)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.2	Implement automated detection for grooming behavior patterns in messaging	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.3	Implement automated detection for bullying/harassment directed at minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.4	Implement automated detection for self-harm/suicide content visible to or created by minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.5	Implement automated detection for sexual exploitation content not covered by CSAM hashing	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.6	Implement automated detection for violent extremism/radicalization targeting minors	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.7	Publish detection accuracy metrics (precision, recall) per category, per language, quarterly	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.1.8	Detection systems must support at minimum the primary languages of the jurisdictions where the platform operates	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-CD.2 – Dark Patterns & Manipulative Design

Platforms must not use design patterns that exploit minors' developmental vulnerabilities.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-CD.2.1	Infinite scroll disabled by default for minor accounts	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.2.2	Push notifications for engagement (not safety) limited to configurable maximum for minor accounts	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-CD.2.3	Streak mechanics, social pressure indicators (read receipts, online status), and FOMO-inducing features must be opt-in for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.2.4	Loot box / randomized reward mechanics must display odds and require parental consent for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.2.5	Time-spent nudges (break reminders, daily limit tools) must be available and enabled by default for minor accounts	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-CD.3 – Content Moderation for Minor Spaces

Where minors can view or contribute content, moderation must meet elevated standards.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-CD.3.1	Human review available within 24 hours for content flagged as harmful to minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.3.2	Escalation path to law enforcement for credible threats to minor safety (mandatory reporting)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.3.3	Transparency report published annually covering: volume of minor-related content reports, action rates, response times, and detection accuracy	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.3.4	Minor users can report content/contact with maximum 2 taps/clicks	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-CD.3.5	Reported content hidden from the reporting minor immediately (pending review)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## Domain 3: Data & Privacy for Minors (CS-DM)

Ensure minor data is collected, processed, and stored with elevated protections.

### CS-DM.1 – Data Minimization for Minors

Only collect data strictly necessary for the service provided to the minor.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-DM.1.1	Document all data collected from minor users and justify necessity for each data point	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.1.2	Geolocation data from minors must not be collected at precision finer than city-level unless essential for core service function	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.1.3	Biometric data from minors must not be collected without explicit parental consent and must be processed on-device where technically feasible	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.1.4	Data retention for minor accounts must not exceed service period + 30 days after account deletion	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.1.5	Minor data must not be shared with third parties for advertising purposes	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-DM.2 – Privacy by Default

Minor accounts must ship with maximum privacy protections enabled.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-DM.2.1	All privacy settings defaulted to most restrictive option for minor accounts	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.2.2	Data processing for minor accounts limited to on-device where technically feasible	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.2.3	End-to-end encryption enabled by default for minor-to-minor messaging	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.2.4	Minor data must be stored in the jurisdiction of the minor's residence or in jurisdictions with adequate data protection (GDPR adequacy or equivalent)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-DM.3 – Data Protection Impact Assessments

Platforms must conduct and publish DPIAs for features affecting minors.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-DM.3.1	Conduct DPIA before launching any new feature that processes minor data	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.3.2	DPIA must assess risk to minors specifically (not just general users)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.3.3	DPIA summary must be publicly accessible	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-DM.3.4	Re-assess DPIA annually or when significant changes to data processing occur	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## Domain 4: Parental Rights & Controls (CS-PR)

Ensure parents/guardians have meaningful oversight and control.

### CS-PR.1 – Parental Visibility

Parents must be able to understand their child’s digital environment.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-PR.1.1	Provide parental dashboard showing: active contacts, time spent, content categories accessed, safety alerts	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.1.2	Safety alerts delivered to parent/guardian within 5 minutes of detection	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.1.3	Weekly summary report available (opt-in) covering child’s activity patterns	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.1.4	Parental dashboard must be accessible without installing additional software on the child’s device	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.1.5	Parental access secured by strong authentication (minimum 2FA)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-PR.2 – Parental Controls

Parents must be able to configure safety boundaries.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-PR.2.1	Screen time limits configurable by parent per day/week	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.2.2	Contact approval (allowlist/blocklist) configurable by parent	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.2.3	Content category restrictions configurable by parent	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.2.4	Age-graduated controls that evolve as child ages (automatic defaults shift, parent can override)	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.2.5	Emergency override: parent can remotely restrict all non-essential features immediately	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-PR.3 – Child Agency

Parental controls must balance safety with age-appropriate autonomy.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-PR.3.1	Children aged 13+ must be notified when parental monitoring is active	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.3.2	Children can appeal parental restrictions through a mediated process on the platform	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.3.3	Monitoring intensity must decrease by default as the child's age increases	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-PR.3.4	Intervention messaging must be empowerment-based (educational, not punitive)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## Domain 5: Monitoring, Detection & Response (CS-MR)

Ensure platforms detect threats in real-time and respond appropriately.

### CS-MR.1 – Real-Time Threat Detection

Platforms must operate continuous monitoring for threats to minors.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-MR.1.1	Real-time analysis of messages sent to/from minor accounts for threat patterns (grooming, exploitation, bullying, self-harm)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.1.2	Behavioral analysis engine tracking conversation-level patterns (escalation, secrecy requests, platform migration, boundary testing)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.1.3	Image/video analysis for harmful content in media shared with minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.1.4	Detection must operate in all languages the platform supports for minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.1.5	On-device detection preferred where technically feasible; cloud detection must comply with CS-DM controls	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.1.6	Detection models must be auditable by qualified third parties	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-MR.2 – Incident Response

Platforms must have defined procedures for responding to detected threats.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-MR.2.1	Critical threats (CSAM, imminent physical danger) escalated to law enforcement within 1 hour	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.2.2	High-severity threats (grooming, exploitation) actioned within 4 hours (account restriction, content removal, parent notification)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.2.3	Medium threats (bullying, harassment) actioned within 24 hours	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.2.4	All threat actions logged with timestamp, category, confidence score, and action taken	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-MR.2.5	Incident response team with child safety training available 24/7 for Level 1 platforms	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.2.6	Post-incident review conducted within 7 days for critical/high severity incidents	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-MR.3 – Accuracy & Transparency

Detection systems must be measurably accurate and transparently reported.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-MR.3.1	Maintain precision $\geq 85\%$ and recall $\geq 75\%$ for each detection category in each supported language	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.3.2	Publish quarterly accuracy reports by category and language	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.3.3	False positive rate must not exceed 10% (to prevent alert fatigue)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.3.4	Independent accuracy audit by qualified third party annually (Level 1 and 2 platforms)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-MR.3.5	Detection models must be re-trained/updated at minimum quarterly to address evolving threat patterns	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## Domain 6: Governance & Organizational Policy (CS-GO)

Ensure platforms maintain organizational commitment to child safety.

### CS-GO.1 – Child Safety Program

Platforms must establish and maintain a formal child safety program.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-GO.1.1	Designate a Child Safety Officer (CSO) at executive level	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.1.2	Child Safety Policy documented, board-approved, and publicly accessible	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.1.3	Annual child safety risk assessment covering all platform features accessible to minors	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.1.4	Child safety budget allocated as identifiable line item	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.1.5	Child safety metrics reported to board/ leadership quarterly	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-GO.2 – Training & Awareness

Staff involved in features used by minors must receive child safety training.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-GO.2.1	All engineers working on minor-facing features complete child safety training annually	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.2.2	Content moderation staff receive specialized training on minor-specific harms	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.2.3	Trust & Safety team includes at least one specialist in child developmental psychology	Addressable	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

### CS-GO.3 – Third-Party & Vendor Management

Third parties with access to minor data or features must meet Custorian requirements.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-GO.3.1	All third-party SDKs/APIs processing minor data must be documented and assessed for child safety impact	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.3.2	Third-party advertising networks must comply with CS-DM.1.5 (no minor data for advertising)	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.3.3	Third-party content providers accessible through the platform must meet CS-CD.1 detection requirements or be filtered for minor accounts	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

## CS-GO.4 – Regulatory Compliance Mapping

Platforms must demonstrate how Custorian controls satisfy applicable laws.

CONTROL	DESCRIPTION	TYPE	STATUS	EVIDENCE / NOTES
CS-GO.4.1	Maintain regulatory cross-reference matrix mapping each applicable law to Custorian controls	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	
CS-GO.4.2	Monitor regulatory changes in all jurisdictions where minors use the platform and update controls within 90 days of new requirements	Required	<input type="checkbox"/> In Place <input type="checkbox"/> Partial <input type="checkbox"/> Not in Place <input type="checkbox"/> N/A	

# Compliance Summary

Complete this summary after assessing all controls above. Count the status of each control per domain.

DOMAIN	TOTAL CONTROLS	IN PLACE	PARTIAL	NOT IN PLACE	N/A
CS-AC – Age Controls	15				
CS-CD – Content & Design Safety	18				
CS-DM – Data & Privacy for Minors	13				
CS-PR – Parental Rights & Controls	14				
CS-MR – Monitoring, Detection & Response	17				
CS-GO – Governance & Organizational Policy	12				
<b>TOTAL</b>	<b>89</b>				

## Compliance Determination

OUTCOME	CRITERIA
Custorian Compliant	All Required controls are “In Place.” All Addressable controls are “In Place,” have a compensating control, or have documented justification for N/A.
Custorian Partial	>80% of Required controls are “In Place.” Remediation plan submitted for remaining controls with target completion within 90 days.
Non-Compliant	<80% of Required controls are “In Place.”

This platform’s compliance outcome: \_\_\_\_\_

## Attestation

I attest that the information provided in this Self-Assessment Questionnaire is accurate and complete to the best of my knowledge. I understand that:

1. This assessment reflects the platform’s compliance posture as of the assessment date noted above.
2. Any material changes to the platform’s features, architecture, or policies affecting minor users require re-assessment within 90 days.
3. Marking a control as “In Place” constitutes a formal assertion that the control is fully implemented and supported by evidence.
4. Deliberately misrepresenting compliance status may result in revocation of Custorian certification and referral to relevant regulatory authorities.
5. For Level 1 and Level 2 platforms, this SAQ is subject to validation by a Qualified Safety Assessor (QSA).

Assessor Signature	Child Safety Officer Signature
Name: _____	Name: _____
Title: _____	Title: _____
Date: _____	Date: _____
Signature: _____	Signature: _____

## Next Steps

- After completing this SAQ:**
- All Platforms:** Submit the completed SAQ to the Custorian Standards Council at [compliance@custorian.org](mailto:compliance@custorian.org).
  - Level 1 and Level 2 Platforms:** A Qualified Safety Assessor (QSA) must validate your SAQ within 60 days of submission. Contact the Custorian Standards Council for a list of approved QSAs.
  - Remediation:** If any Required controls are marked “Partial” or “Not in Place,” submit a remediation plan with target dates. Remediation must be completed within 90 days for Custorian Partial status, or the assessment reverts to Non-Compliant.
  - Certification:** Upon successful validation, the platform will receive a Custorian Certified badge (self-assessed) or Custorian Verified badge (QSA-validated), valid for 12 months.
  - Re-Assessment:** SAQ must be completed annually. Material changes to the platform require interim re-assessment.

**Questions?** Contact the Custorian Standards Council at [compliance@custorian.org](mailto:compliance@custorian.org) or visit [custorian.org/compliance](http://custorian.org/compliance) for guidance documents, FAQ, and assessor directory.

*Custorian Self-Assessment Questionnaire (SAQ-C) v0.1 – Based on the Custorian Controls Framework (CCF) v0.1  
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