



CHILDSAFE AI · PRIVACOMPLY LTD

Children's Digital Safety Compliance Certificate

AI-Assisted Analysis · Human-Reviewed · Expert Sign-Off

childrenscode

eukidsact



HIGH RISK

COMPLIANCE
SCORE

DOCUMENT / PLATFORM ASSESSED

LearnSphere Horizon Privacy Notice

ISSUED

29 September 2026

REVIEW DECISION

• Approved with Modifications

EXPERT REVIEWER

Kevin Morrison

Data Protection Officer · PrivaComply Ltd

IAPP CIPP/E

CIPM

Kevin Morrison

29 Sept 2026

AUTHENTICATION

PIN Authenticated

FRAMEWORK COMPLIANCE SCORES

childrenscode

28/100 · Non-Compliant

eukidsact

28/100 · Non-Compliant

CHILD RIGHTS IMPACT ASSESSMENT (CRIA)

UNCRC General Comment No. 25 · 29/09/2026

● 28/100 · Non-Compliant

LearnSphere Horizon fundamentally fails to align with General Comment No. 25 by subordinating the best interests, privacy, and developmental autonomy of child users to commercial engagement metrics an...

Recommendation: Suspend pending remediation

⚠ 7 article(s) rated RED — remediation required before certification

EXECUTIVE SUMMARY

The LearnSphere Horizon Privacy Notice demonstrates an acutely deficient compliance posture with an overall high-risk score of 28/100 across both domestic and European child-safety frameworks. Primary critical exposures stem from the explicit failure to comple...

TOP PRIORITY ACTIONS

- 1

"Immediately complete, publish, and integrate a dedicated child-specific Data Protection Impact Assessment (DPIA) addres...
- 2

"Complete and publish an ex-ante Child Safety Assessment (CSA) and risk conformity audit evaluating algorithmic profilin...
- 3

"Reconfigure all platform default settings to the highest privacy level by default in accordance with Standard 7, disabl...

INTEGRITY HASH (SHA-256)

6d3fcea4debf0957bb7190fcedda6e8a47d941b18a3e5d099d9b899bae2da0b4

This certificate records that the AI-generated compliance analysis has been independently reviewed by a qualified human professional in accordance with **UK GDPR Article 22** and the **ICO AI Governance Framework**. Reviewer identity authenticated via hashed PIN (SHA-256). Generated by ChildSafe AI using Google Gemini. **Framework criteria last reviewed: August 2026**. This document is for governance and audit purposes only and does not constitute legal advice.

Detailed Audit Trail

Continuation · ChildSafe AI Compliance Certificate · CERT-FE6A2F4B-2A99-43

REPORT IDENTIFICATION

DOCUMENT ANALYSED

LearnSphere Horizon Privacy Notice

ANALYSIS DATE

Tuesday, 29 September 2026 at 09:59

OVERALL SCORE

28/100

RISK LEVEL

HIGH

REPORT UUID

fe6a2f4b-2a99-4304-94d3-8f0e4f9771db

CERTIFICATE ID

CERT-FE6A2F4B-2A99-43

CERTIFICATE GENERATED

Tuesday, 29 September 2026 at 10:07

AI MODEL

Google Gemini 3.8 Flash

FRAMEWORK ASSESSMENT BREAKDOWN

FRAMEWORK	SCORE	STATUS	SCORE BAR
childrenscore	28/100	• Non-Compliant	
eukidsact	28/100	• Non-Compliant	

REVIEWER CREDENTIALS & AUTHENTICATION

FULL NAME

Kevin Morrison

PROFESSIONAL TITLE

Data Protection Officer

ORGANISATION

PrivaComply Ltd

QUALIFICATIONS

✓ IAPP CIPP/E

✓ CIPM

AUTHENTICATION METHOD

🔑 PIN Authenticated (SHA-256)

REVIEW DECISION

Approved with Modifications

REVIEW INTEGRITY & VERIFICATION

SHA-256 INTEGRITY HASH

6d3fcea4debf0957bb7190fcedda6e8a47d941b18a3e5d099d9b899bae2da0b4

Verification: This hash is a SHA-256 digest of: Report ID + Reviewer ID + Decision + Timestamp. To independently verify, recompute `SHA-256(reportId|reviewerId|reviewDecision|reviewTimestamp)` and compare. Framework criteria last reviewed: **August 2026**. Always verify against current ICO, Ofcom and DfE guidance.