



# Child Financial Harms (CFH) Consortium

End of Programme Evaluation (2023-26)

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## Table of Contents

<b>Executive Summary</b>	<b>3</b>
1. Introduction	7
2. Evaluation Design and Methods	8
3. Cross-cutting Findings	10
4. Project Landscape and Contribution Summary	14
5. Conclusions	16
6. Recommendations and Implementation Considerations	20

## Annexes

- Annex 1. Detailed Findings by Evaluation Question
- Annex 2. Evidence of wider sector uptake, recognition and influence
- Annex 3. Project Landscape and Contribution: Project by Project Summary
- Annex 4. Evaluation framework matrix
- Annex 5. Data sources register
- Annex 6. Study Interview Participants

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**Note:** Detailed question-level findings sit in Annex 1. The fuller Internal Evidence Base (which summarises the various raw data sources) is retained separately.

## Executive Summary

### Overview

Child financial harms are an emerging but increasingly important area of risk for children and young people. Digital technologies have expanded the opportunities, incentives and means for children to make, spend and lose money online, often beyond the effective oversight of parents and carers. These harms matter not only because of direct financial loss, but because they sit at the intersection of online safety, child protection, financial capability and platform design. The [Child Financial Harms programme](#) was established in response to this gap as a three-year, cross-sector initiative to explore and test ways of preventing and mitigating these harms through evidence generation, stakeholder engagement, practical development and collaboration.

This evaluation assesses what the programme delivered, what it most credibly contributed, and what has been learned from the consortium model, the project portfolio and the programme's wider field-building work. It provides an overall judgement on contribution, learning and future implications at the end of the funded period.

### Approach

This evaluation drew on a mixed evidence base combining programme records, evaluator-generated material and external reference sources. The main sources were Agile Project Reports, Quarterly Progress Reports, Consortium Learning Calls, third-party publications and related background and outcomes-pathway materials. Analysis was question-led and based on structured synthesis and triangulation, with greater weight given where different source types pointed in the same direction.

This was a contribution-focused end-of-programme evaluation rather than a formal impact evaluation. It was not designed to support simple attribution claims or to evidence long-term system change through consistent programme-wide outcome measurement. Instead, it makes proportionate judgements about what the programme appears to have contributed, where the evidence is strongest, and where important questions remain unresolved.

### Headline findings

#### **The programme made a credible strategic contribution in an emerging field**

Overall, the evaluation supports a positive but qualified judgement. The programme made a credible and strategically important contribution in an area that was under-developed at the outset. Its strongest contribution was not to resolve child financial harms as a field of policy or practice, but to move it forward: by strengthening its legitimacy as a cross-sector issue, building a more usable evidence base, and translating that learning into forms that others could use. The programme's value lay less in any single project than in the cumulative effect of evidence generation, framing, translation and applied development across the portfolio. However, some projects, including the Ratings tool / Gaming Risk Index, remain at an earlier stage of development. It is therefore too early to rule out the potential for individual projects to achieve wider system-level influence as they develop further.

#### **The consortium model created value, but only through active coordination**

The consortium's breadth was a genuine asset, but not a self-managing one. Cross-sector membership added legitimacy, specialist insight and reach, while also introducing friction through different organisational cultures, incentives and delivery rhythms. The model worked best where breadth was matched by a strong backbone function, active coordination and collaboration formats

suited to different tasks. Broad forums helped with shared direction and legitimacy; smaller groups, bilateral engagement and specialist-led workstreams were more effective for detailed alignment and delivery.

### **The programme's strongest contribution was turning evidence into usable assets**

The programme appears to have added most value not simply by generating evidence, but by making evidence more usable. The value of this translation was also visible in how participants described their own learning. One reflected that the programme had

*“opened my eyes to the potential risks that are there for youngsters”,*

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...particularly in relation to the financial engagement young people now experience online. Research, consultation and cross-sector learning were translated into guidance, training, educational resources, messaging tools and other practical outputs. This was one of the programme's clearest areas of contribution because learning did not remain at the level of general awareness. It informed materials, framing and delivery choices that could be applied by others. Some of the strongest contributions sit in work such as the education offer, ratings tool, youth support, organisational guidance and emerging risk-signalling tools, where evidence was converted into forms with practical use.

#### **Illustrative example: Ratings tool / Gaming Risk Index**

The Ratings tool, now being developed as the Gaming Risk Index, illustrates the programme's ability to turn evidence into practical assets. It drew on earlier parent and youth research, policy mapping, wider programme learning and academic expertise on gaming monetisation, before moving through feasibility work into prototype development. It remains an emerging asset rather than an embedded intervention, but shows how cumulative learning and cross-sector collaboration can produce practical tools with growing stakeholder interest.

### **Agility helped the programme respond to a fast-moving issue, but needed stronger discipline**

The evaluation supports a positive but qualified view of the programme's agile approach. Iteration, resequencing and adaptation often improved fit and helped projects respond to learning, technical barriers, legal constraints and changing external conditions. In that sense, the portfolio showed an ability to learn in motion rather than remain locked into a rigid delivery model. However, this agility was more effective at project level than it was consistently governed across the programme as a whole. The evidence points to administrative burden, the complexity of managing multiple small projects, and uneven clarity about how strategic choices were made across the portfolio. The lesson is not that agility was misplaced, but that it required stronger prioritisation, review and portfolio-level discipline. This was reflected in one participant's observation that could start to drift where there were not sufficiently clear agile review points built in.

*“the things that really play to the strengths of having a multidisciplinary consortium”*

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### **Institutional traction increased, but leverage and long-term sustainability remain uneven**

The programme appears to have made a meaningful contribution to the visibility and legitimacy of child financial harms, particularly among policy, regulatory, education and closely engaged

stakeholder audiences. However, traction was uneven. The evidence is weaker on whether increased visibility translated into broader operational change among the actors with greatest power to alter products, systems and market conditions, especially major platforms and direct financial institutions. Sustainability was similarly differentiated. Continuation prospects were strongest where outputs had been embedded in existing systems, routines or delivery channels, particularly in education, training and some guidance-related work. This pattern should also be read in light of project maturity. Some projects had longer delivery histories and clearer routes into existing systems, while others were deliberately at earlier stages of development, testing or rollout by the end of the funded period. For these newer or more technically exploratory strands, the fairest judgement is not yet about embedded impact, but about feasibility, strategic relevance, stakeholder interest and the conditions required for future uptake. Elsewhere, shared assets, research translation, prototype tools and consortium infrastructure remain more fragile because they still depend on active stewardship, ownership and funding.

### **Confidence and limitations**

The evaluation supports its strongest judgements in four areas: that the programme built a credible cross-sector platform around an under-recognised issue; that consortium breadth created value when actively coordinated; that one of the clearest contributions was translating evidence into usable forms; and that continuation prospects are strongest where outputs have already been embedded in existing systems. These findings recur consistently across the report's cross-cutting analysis, project landscape and conclusions.

Important limitations remain. This is an end-of-programme evaluation in a complex and still-emerging field, so it is better placed to assess contribution, learning, traction and continuation prospects than longer-term system change. The evidence base is also uneven across questions and partly self-reported, particularly in relation to internal programme reporting. These limitations were mitigated through triangulation, question-led synthesis and the use of external reference sources, but the report should still be read as a careful synthesis of the best available evidence rather than as a definitive impact study. Evidence is more limited on deeper operational change among high-leverage actors, on the long-term durability of some outputs, and on the wider evidence architecture, which remains stronger on credible pathways into harm than on prevalence, distribution and system-wide priority.

### **Recommendations at a glance**

The next phase should focus on consolidation as much as extension. The first priority is to clarify which outputs should now be embedded, which require active stewardship, and which should conclude. Related to this, any continuation of the work should make the backbone function explicit and properly resourced, because coordination, convening, translation and synthesis were central to the value created and are unlikely to continue at the required level through goodwill alone.

The evaluation also points to the need for a more systematic evidence architecture for child financial harms, with greater attention to prevalence, distribution, priority pathways and the practical conditions for safer data sharing. Alongside this, future effort should focus less on broad issue recognition alone and more on securing clearer operational engagement from higher-leverage actors, particularly those with power to influence products, systems and market conditions. For funders considering a consortium-based model, the implication is to adopt it selectively and to resource it with a timeframe, governance model and delivery backbone that match the scale and complexity of

the change being sought. The programme made meaningful progress, but whether that progress endures will depend on what is deliberately stewarded next.

## 1. Introduction

Child financial harms are an emerging but increasingly important area of risk for children and young people. Digital technologies have expanded the opportunities, incentives and means for children to make, spend and lose money online, often beyond the effective oversight of parents and carers. These harms can arise through scams and phishing, gaming environments, pseudo-currencies and other online transactions, and can intersect with wider forms of exploitation and abuse. The issue matters not only because of financial loss, but because it sits at the intersection of online safety, child protection, financial capability and platform design. Programme materials argue that this is a fast-developing area in which children are already acting as financial agents, while the systems around them have not yet adapted.

The Child Financial Harms (CFH) programme was established in response to that gap. Funded by Nominet through its Countering Online Harms Innovation Fund, it was delivered over three years by a consortium led by Parent Zone, with UK Finance, Cifas, PSHE Association, Dr David Zendle from University of York and Reason Digital. The programme was designed as a systemic response to a new and under-developed category of harm, rather than as a single intervention. Its purpose was to explore and test ways of preventing and mitigating child financial harms through a combination of evidence generation, stakeholder engagement, practical testing and cross-sector collaboration.

The original outcomes pathway set out a high-level theory of change for how this work was expected to contribute to progress. At its core was the proposition that child financial harms required a coordinated response across policy, education, research, technology and finance. The programme assumed that stronger evidence, clearer framing, practical experimentation and cross-sector recognition would help make the issue more visible, more actionable and better addressed over time. It also assumed that child financial harms should be treated as a distinct area of concern, while recognising their links to other forms of harm and exploitation. The intended longer-term direction was toward better recognition of the issue, stronger support for children and parents, more transparency around harmful financial mechanics, and more effective mitigation through systems, services and platforms.

This evaluation takes place at the end of the programme period. Its purpose is to assess what the programme delivered, what it appears to have contributed, and what has been learned from the consortium model, the project portfolio and the programme's wider field-building work. It is both retrospective and forward-looking: it provides an overall account of the programme's contribution to date, while also identifying lessons for any future phase of work in this area. The report is intended primarily for Parent Zone, consortium partners and Nominet, but it is also relevant to external audiences with an interest in child financial harms, including policymakers, regulators, practitioners, funders and organisations working across online safety, child protection, finance and education.

The main body of the report presents the overall evaluative narrative, including the evaluation approach, the cross-cutting findings, the project landscape, and the conclusions and recommendations. Annex 1 provides the detailed findings by evaluation question and is the main supporting annex for readers who want to follow the fuller analytical trail. The remaining annexes provide supporting reference material, including evidence of wider sector uptake and influence, project-by-project summaries, the evaluation framework, the data sources register, and the study participants.

## 2. Evaluation Design and Methods

### 2.1 Evaluation objectives and questions

This evaluation was designed to:

1. Assess what the CFH programme delivered across the three-year period
2. Examine what the programme appears to have contributed at project, programme and wider-sector level
3. Identify what has been learned from the consortium model and the programme's agile, iterative approach
4. Assess prospects for sustainability, continuation and future stewardship
5. Provide a clear evidence base for the report's conclusions and recommendations.

The review was structured around eight overarching evaluation questions, grouped into three areas: working as a consortium; taking an agile and iterative approach; and overarching outcomes. These were supported by sub-questions on collaboration, added value, learning transfer, sustainability, adaptation over time, wider sector interest, and how CFH is understood and framed. The evaluation framework in Annex 4 mapped each question against the available evidence sources so that conclusions could be reached through cumulative assessment rather than reliance on any single source or perspective.

### 2.2 Data sources and coverage

The review drew on a mixed evidence base combining programme records, evaluator-generated material and external reference sources. Table below summarises the main source types and their role in the review.

Evidence source	Main role in the review	Source type	Coverage
Agile Project Reports	Core record of project aims, delivery, outputs, changes over time and links to the theory of change	PDF report bundle	Across individual projects over the three-year programme period
Quarterly Progress Reports	Core record of programme-level activity, outputs, delivery progress and emerging issues	PDF report bundle	Years 1–3, produced quarterly
Consortium Learning Calls	Independent reflective evidence on delivery experience, collaboration, learning, sustainability and future implications	Interview transcript bundle	Conducted at end of Year 3, reflecting back across the full programme period
Third-party publications, research, guidance and media	Supporting evidence on external uptake, recognition, engagement and wider influence	Mixed documentary and online sources	Produced during and around the programme period

Background and outcomes pathway materials	Contextual evidence on programme rationale, assumptions, intended contribution and evolution of the theory of change	Programme documents	Mainly start-up and pathway development stages, with later refinement where relevant
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In practice, the Agile Project Reports and Quarterly Progress Reports provided the main internal record of delivery and self-reported progress. The Consortium Learning Calls added an independent evaluative layer through retrospective interviews conducted by the external evaluator. External publications and related materials were used primarily to test whether signs of influence, uptake or recognition were visible beyond the consortium's own reporting.

### 2.3 Analytical approach

The analysis was question-led and based on structured synthesis and triangulation. Evidence was reviewed against each evaluation question and sub-question, using the framework in Annex 4 to identify where findings were supported across multiple source types, where they rested mainly on one form of evidence, and where they remained partial or uncertain. This process informed the detailed question-level analysis in Annex 1, while the main report draws out the strongest cross-cutting patterns, judgements and implications at programme level.

Triangulation was central to how conclusions were reached. Programme documentation was used to establish what was planned, delivered and reported over time. Learning Calls were used to test and interpret those patterns, including how participants understood delivery, collaboration, adaptation and sustainability in retrospect. External sources were then used, where relevant, to check whether claimed traction or influence had some visibility beyond internal programme accounts. Conclusions were given greater weight where these different source types pointed in the same direction, and treated more cautiously where evidence was mixed, indirect or confined to a single source type.

The review combined qualitative and quantitative evidence where relevant, but it was not a formal impact evaluation based on consistent programme-wide outcome measurement. Much of the evaluative judgement depended on qualitative synthesis across reports, interview material and external reference sources. Quantitative evidence was used where projects had generated it directly, for example through polling, usage data or structured feedback. The aim was therefore to make proportionate judgements about contribution, learning and continuation prospects rather than to claim simple attribution in a complex and evolving programme environment.

AI tools were used in a limited supporting role during the review process: to assist with transcription, support first-pass coding, generate coherent source summaries for familiarisation and infographic design. They were used as an adjunct to analysis, not a substitute for it. All interpretation, synthesis, triangulation and final judgements were undertaken and reviewed by the evaluator.

This approach is consistent with the overall report design. Annex 1 was structured to distinguish clearly between the short answer to each evaluation question, the strongest supporting evidence, more uncertain or limited areas, and the implications flowing from the analysis. This helped keep the main report focused on synthesis and judgement while retaining a transparent analytical trail behind its conclusions. The approach also reflects the report-writing principle that method should operate as a credibility anchor: clear enough for the reader to understand how conclusions were reached,

proportionate to the evidence available, and closely linked to the report's overall evaluative argument.

## **2.4 Limitations, bias and mitigation**

This review has several important limitations. First, it is an end-of-programme evaluation in a complex and still-emerging field. It is therefore better placed to assess contribution, learning, traction and prospects for continuation than to evidence longer-term system change. Secondly, the evidence base is uneven across questions. It is strongest where projects produced clear outputs, documentary records or visible signs of external uptake, and weaker where conclusions depend on future continuation, absent stakeholders or wider systems change not directly observed within the programme.

Thirdly, a substantial part of the evidence base is self-reported. This applies particularly to the Agile Project Reports and Quarterly Progress Reports, which document activity and progress from within the programme itself. That creates some risk of selective emphasis, incomplete reporting or stronger visibility for reported successes than for weaker or less resolved areas. The Learning Calls partly mitigated this by providing a more reflective evidence source generated through interviews conducted independently by the external evaluator, rather than through internal reporting alone.

These limitations were mitigated in three main ways. First, conclusions were based on triangulation across multiple source types wherever possible, rather than relying on a single account. Secondly, the analytical structure used in Annex 1 required explicit distinction between stronger findings, more limited findings and areas of uncertainty, which helped keep judgements bounded by the available evidence. Thirdly, external sources were used where relevant to test whether reported programme influence or wider sector traction was visible beyond internal programme accounts. Even with these mitigations, the report should be read as a careful synthesis of the best available evidence rather than as a definitive impact study. That is the appropriate level of claim for a programme of this kind: sufficiently robust to support judgement and learning, while remaining proportionate about what the evidence can and cannot show.

Quantitative delivery data, such as participation numbers, resource access and engagement metrics, were available for some projects through Agile and Quarterly reporting. These were reviewed as part of the evidence base and used selectively where they helped evidence reach or uptake. However, they were not consistently available or comparable across all projects and are therefore not presented systematically within this report.

## **3. Cross-cutting Findings**

This chapter draws together the detailed findings in Annex 1 to identify the patterns that matter most at programme level. Rather than repeating the question-by-question analysis, it synthesises the evidence across the programme to show where findings are strongest, where progress depended on particular conditions, and where important issues remain unresolved.

### **3.1 Breadth created value, but only where diversity was actively coordinated**

The clearest finding across the evaluation is that the consortium's breadth was a genuine asset, but not a self-managing one. Cross-sector membership added legitimacy, reach and specialist insight. It also introduced friction: different organisational cultures, languages, incentives and delivery rhythms increased the need for coordination, translation and brokerage.

This is one of the strongest findings in the evidence base. Across Annex 1 and the various raw data sources, the consortium worked best where breadth was matched by a strong backbone function, clear working rhythms and collaboration formats suited to different tasks. Formal governance mattered, but it was not sufficient on its own. In practice, progress depended on active coordination: convening, following up actions, aligning specialist partners and maintaining coherence across a diverse portfolio.

As one participant put it,

*“Someone has to set deadlines, convene meetings, chase reporting and hold the pen on the overall process. Had it been left to us without dedicated project management, it just would not have happened.”*

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The evidence also suggests that the most effective model was layered rather than uniform. Broad forums were useful for shared direction, legitimacy and trust-building. Smaller groups, bilateral engagement and specialist-led workstreams were more effective for detailed alignment and delivery. This matters because it shifts the lesson away from consortium breadth in itself and toward the conditions under which breadth becomes useful.

This is an important programme-level finding because it explains both the value the consortium created and the challenge it carried. The programme benefited from bringing together education, fraud, finance, research, design and parenting perspectives, but those benefits were realised only because coordination capacity absorbed the complexity that such breadth created.

### **3.2 The programme strengthened the usability of evidence, but the underlying evidence base remains incomplete.**

A second strong finding is that the programme’s value did not lie only in generating evidence, but in making that evidence usable. The programme appears to have added most value where research, consultation and cross-sector insight were translated into tools, training, guidance, educational materials, practical framing or more credible implementation choices.

This pattern recurs across several parts of the evaluation. Cumulative learning was strongest where earlier work informed later design and delivery, and where shared assets helped knowledge move across projects. The strongest examples of collaboration were not those in which partners simply exchanged perspectives, but those in which learning shaped outputs or practice. The Ratings tool / Gaming Risk Index is a clear example of this in practice, drawing on earlier parent and youth insight, academic expertise on gaming monetisation, and feasibility work before moving into prototype development. In this sense, translation was not a secondary dissemination function. It was one of the main ways the programme created practical value.

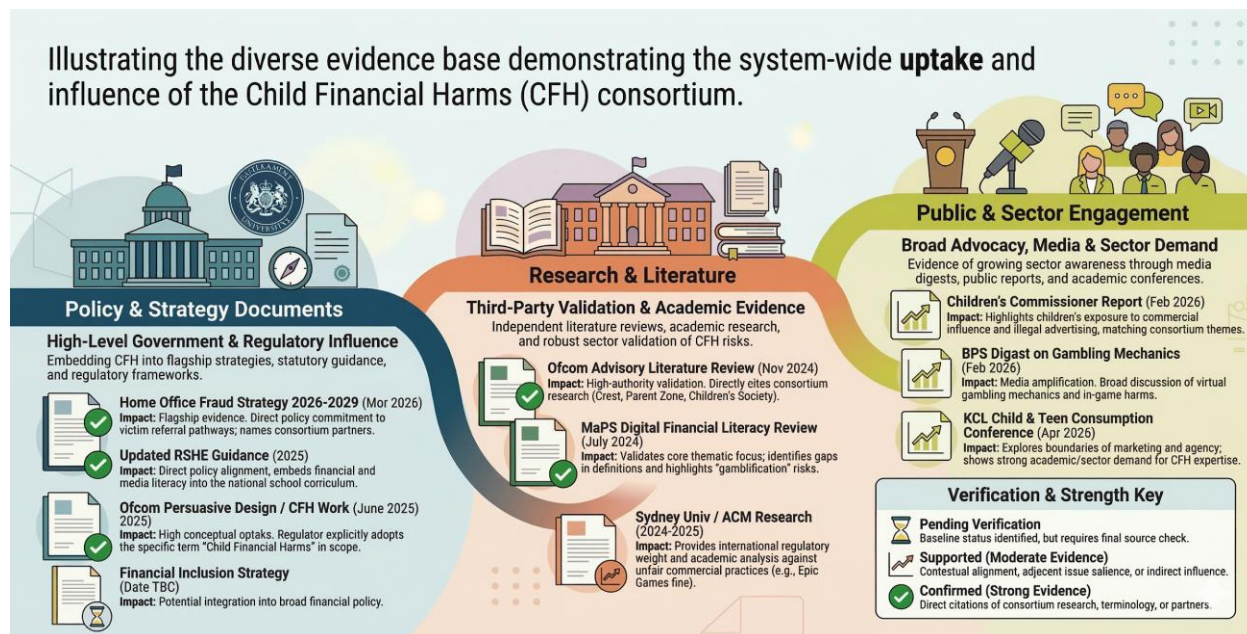
The same pattern is visible in the programme’s framing work. The evidence suggests that child financial harms gained traction most clearly as a policy and systems concept, particularly among regulatory, policy and education audiences. Understanding was weaker among wider public and frontline audiences, and specific harm pathways were often more readily recognised than the umbrella term itself. The programme therefore appears to have been most effective where it translated a complex issue into forms that different audiences could act on, rather than assuming that recognition of the concept would spread evenly on its own. The value of this translation was also visible in how participants described their own learning. One reflected that the programme had

*“opened my eyes to the potential risks that are there for youngsters”*

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...particularly in relation to the financial engagement young people now experience online.

This matters because it clarifies what the programme most credibly contributed. It did not only strengthen the evidence base around child financial harms. It also made that evidence more usable across different settings. That is a stronger and more defensible contribution than a broader claim that awareness alone increased.



The evaluation also suggests that one of the programme's clearest contributions was to expose the limits of the existing evidence base on child financial harms. While the programme helped generate and translate more usable evidence, the underlying evidence architecture remains incomplete. Available sources are partial, fragmented, and stronger on indicating credible pathways into harm than on providing robust estimates of prevalence, distribution or priority across the wider population. Broader understanding is further constrained by inconsistent measurement and barriers to data sharing. This matters because it helps explain why child financial harms can be increasingly visible and institutionally credible, while still being difficult to prioritise consistently at senior policy and operational levels.

### 3.3 Agility added value when it was disciplined by prioritisation and review

The evidence supports a positive but qualified view of the programme's agile approach. Iteration, resequencing and adaptation often improved fit and helped projects respond to changing circumstances. However, agility appears to have worked best where it was paired with clear prioritisation, structured review and a sufficiently strong framework for decision-making.

Across the evidence, most adaptation appears to have preserved rather than diluted strategic intent. Projects were often refined, narrowed or re-sequenced in response to learning, technical barriers, legal constraints or changing external conditions. This is an important strength of the programme. It suggests that the portfolio was capable of learning in motion rather than being locked into a rigid delivery model.

At the same time, the evidence is more mixed on how well this agility operated at programme/consortium-wide level. Interview and synthesis material point to administrative burden, the complexity of managing multiple small projects, and uneven clarity about how strategic choices were

being made across the portfolio. The evidence also suggests that the Theory of Change evolved in the right direction - away from a rigid linear model and towards an adaptive outcomes pathway - but did not always function strongly enough as a live management tool for prioritisation, budget choices and review.

The overall lesson is therefore not that agility was misplaced, but that it needed stronger operating discipline around it. This matters for the programme as a whole because some of its value came from being able to adapt in a fast-moving field. The unresolved issue is how far future phases can retain that flexibility while making portfolio-level choices clearer, sharper and easier to govern.

### **3.4 The programme built visibility and institutional traction, but leverage remained uneven**

The programme appears to have made a meaningful contribution to the visibility and legitimacy of child financial harms, particularly among policy, regulatory, education and closely engaged stakeholder audiences. It also appears to have strengthened the evidence base available to those audiences. However, traction was uneven, and the programme was less successful in securing deeper leverage with some high-power actors, particularly major platforms and direct financial institutions.

This is one of the clearest distinctions in the findings. The evidence supports a reasonably strong judgement that child financial harms became more visible and more actionable in institutional settings during the programme period. The consortium's external connectivity, combined with the growth in research, consultation and applied outputs, appears to have helped move the issue beyond a niche concern. The strongest evidence here is not simply that stakeholders expressed interest, but that the issue was increasingly framed, discussed and used in policy-facing, educational and implementation contexts.

The evidence is weaker, however, on how far that traction converted into broader operational change among the actors with greatest power to alter products, systems and market conditions. Important gaps remained in engagement with major tech platforms, direct financial actors and some emerging technical risk areas. The evidence also remains weaker on why that engagement was limited, because absent or lightly engaged sectors are not well represented in the source base. This makes the judgement clear but bounded: traction improved, but leverage remained partial.

This matters because it sharpens the programme-level story. The programme's most credible external contribution was to build the issue's visibility, legitimacy and evidence architecture. The more difficult next step - converting that position into wider systems change among high-leverage actors - remains incomplete.

### **3.5 Sustainability depended on embedding, ownership and funded stewardship**

The sustainability picture is differentiated rather than uniform. The evidence suggests that the strongest continuation prospects are for work that has been embedded into existing systems, institutional routines or delivery channels. By contrast, consortium infrastructure, research translation, shared assets and more innovation-dependent projects remain more fragile where they still depend on active stewardship, unresolved ownership or further funding.

This is one of the strongest and most consistent findings across Annex 1 and the various data sources. At project level, sustainability appears strongest where outputs have a clear institutional home and a low ongoing maintenance burden. Education and training-related work has the clearest pathway, largely because it aligns with statutory, curricular or established service infrastructures.

Some organisational guidance and practice changes also appear more durable where they have already moved into business-as-usual systems.

The picture is more conditional elsewhere. Research outputs may persist as artefacts, but their influence is less self-sustaining and depends on continued visibility and use. Technical tools and prototype-style projects are the least secure, because their future depends on further investment, ownership, legal resolution or operational development. However, this should also be read in light of project maturity and timing. Several of these strands were developed later in the programme and were still at early stages of rollout, testing or external engagement at the point of evaluation. In these cases, there are emerging signs of stakeholder interest and potential support, but these had not yet translated into fully established delivery or sustained uptake at the time of writing. At consortium level, the evidence is clearer still: the coordinating function that made the model work does not appear sustainable through goodwill alone, and no settled successor arrangement was in place at the point of evaluation. The fragility of this position was captured directly by one participant, who noted that

*“no one’s stepping forward to say, hey, we will fund you to do that.”*

This matters because it shifts the sustainability question onto more realistic ground. The programme did not produce a single sustainable whole. It produced assets with different continuation conditions. The most important unresolved issue is therefore not whether the programme created value, but which parts of that value can endure without deliberate stewardship and which cannot.

### **Overall synthesis**

Taken together, the findings point to a programme that created meaningful value, but did so through a set of demanding conditions rather than through a simple or uniform model of success. The strongest evidence is that the programme built a credible cross-sector platform around an under-recognised issue, strengthened the evidence base, and translated that evidence into more usable forms for policy, practice and delivery. Those contributions are substantive and recur across multiple parts of the evaluation.

The evidence is also clear, however, that the programme’s progress was conditional. Consortium breadth created value only when actively coordinated. Agility added value when paired with prioritisation and review. External traction grew most clearly in institutional settings, but leverage over some high-power actors remained limited. Sustainability was strongest where outputs were embedded, and weakest where continuation depended on shared infrastructure, specialist stewardship or new funding.

The overall programme-level picture is therefore one of substantive progress in defining, evidencing and operationalising child financial harms, alongside a clear set of unresolved questions about stewardship, leverage and long-term continuation. These are not peripheral issues. They are the conditions that will determine whether the progress made through the programme can be consolidated and extended in a future phase.

## **4. Project Landscape and Contribution Summary**

This section provides a concise overview of the project portfolio and its apparent contribution. It follows the cross-cutting findings by shifting from thematic synthesis to comparative perspective: not to reassess each project in detail, but to show how the portfolio developed across different types of activity, levels of maturity and prospects for continuation.

A fuller project-by-project summary is provided in the accompanying annex. For each project, the annex summarises purpose, progress, main outputs, apparent contribution, confidence in the available evidence, connectivity to the wider programme, and sustainability. It is intended as a comparative reference point rather than a scorecard.

Taken together, the portfolio shows a clear progression from early evidence-building and framing work towards more applied delivery, training, advocacy and prototype development. The earlier mapping, consultation and policy-focused projects helped define the issue, identify risks and gaps, and establish a stronger basis for later decisions. Later projects were generally more practical in orientation, translating evidence into guidance, messaging, educational resources, training, public engagement tools and technical proofs of concept.

The programme's contribution did not sit in any single project. It was cumulative. Some of the clearest contributions appear where earlier insight was translated into forms that others could use, particularly through the Education Programme, Youth Support, and organisational guidance. Other projects contributed in different ways, by testing feasibility, clarifying options or creating assets that may support future influence, but whose longer-term effects remain more conditional.

The portfolio also varied in maturity and in the strength of evidence available to support summary judgements. This variation reflects not only differences in performance or continuation prospects, but also the fact that projects began at different points in the programme and were not all intended to reach the same stage by the end of the funded period. Evidence is strongest where projects had clearer outputs, a longer delivery history or more visible routes into practice. For newer, more exploratory or more technically complex projects, the most credible judgement at this stage is often about feasibility, strategic promise, stakeholder interest and the conditions required for further uptake, rather than demonstrated implementation effects.

#### **Illustrative case example: Ratings tool / Gaming Risk Index**

The Ratings tool, now being developed as the Gaming Risk Index, illustrates several of the programme's wider contribution patterns. It built on earlier programme learning, including polling and consultation with parents and young people, and drew on specialist academic expertise on gaming monetisation and related harms. It also demonstrates cumulative development within the portfolio: an initial feasibility phase tested the legal, technical and practical basis for using large-scale review analysis, before the work moved into prototype development and refinement.

The project also illustrates how the consortium approach supported strategic refinement. Rather than moving directly to a full public-facing product, the work appears to have developed through staged testing, feasibility assessment and iteration. This enabled the programme to explore a technically ambitious response while managing uncertainty around data use, legal risk, user needs and regulatory relevance.

At the point of evaluation, the tool should therefore be understood as an emerging and strategically promising asset rather than an embedded intervention. Its longer-term contribution will depend on further development, ownership, stewardship and external uptake. However, early interest from stakeholders, including regulators and policy audiences, suggests that it has potential value as a live risk-signalling tool and as a practical example of how child financial harms can be made more visible in relation to online games.

A similar distinction applies to sustainability. Continuation prospects appear strongest where outputs have been embedded in existing systems, delivery channels or institutional routines, particularly in parts of the education, training and guidance-related work. This was particularly clear in relation to education and training work, where one participant observed that

*“now that financial education has come on the curriculum, it’s going to have a legacy... That’s going to have legs.”*

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By contrast, projects centred on advocacy momentum, shared assets, prototype tools or future system influence appear more dependent on active stewardship, ownership and, in some cases, further funding. This largely reflects differences in maturity, with several strands still at earlier stages of development or rollout at the point of evaluation. In practice, this means the portfolio’s legacy is likely to be differentiated: strongest where work has found an institutional home, and more conditional where projects are still moving from development into sustained use. Overall, the project landscape reinforces the broader programme story set out in the previous chapter. The portfolio combined breadth with a growing practical focus, and it appears to have created most value where evidence was translated into forms that others could use. At the same time, prospects for continuation remain uneven across the portfolio. Some contributions are already embedded; others remain promising but contingent. The accompanying annex provides the fuller comparative detail behind that assessment.

## 5. Conclusions

This chapter draws together the overall conclusions of the evaluation. It sets out the clearest judgements that can now be made about the CFH programme, the contribution it appears to have made most credibly, the areas that remain unresolved or insufficiently evidenced, and the implications that follow for Parent Zone and the consortium, Nominet, government, regulators and platforms, and the wider ecosystem.

### 5.1 Overall judgement

Overall, the evaluation concludes that the programme made a credible and strategically important contribution in an area that was under-developed at the outset. Its strongest contribution was not to resolve child financial harms as a field of practice or policy, but to move the issue forward: by surfacing it more clearly, strengthening its legitimacy as a cross-sector concern, building a more usable evidence base, and translating that learning into forms others could use.

The programme’s value lay less in any single project than in the combined effect of evidence generation, framing, translation and practical application across the portfolio. Taken together, the work helped establish child financial harms as an issue that could be addressed more coherently across policy, regulatory, education and delivery contexts, while also producing outputs that gave that work practical form.

The evaluation also points to clear limits. Progress was uneven across the portfolio, and not all areas of activity showed the same level of traction or continuation potential. External engagement was strongest in parts of the system already more open to the issue, and weaker where influence depended on deeper leverage with major platforms, direct financial institutions and other high-power

actors. Sustainability was similarly mixed, with the clearest continuation pathways where outputs had already been embedded in existing systems or delivery routes.

The overall judgement is therefore positive but qualified. The programme appears to have advanced the field materially in defining, evidencing and operationalising child financial harms. Within a relatively short three-year period, it was not realistic to expect this progress to be fully converted into secure long-term stewardship, broad-based systems change, or consistent operational uptake among the actors with the greatest capacity to reshape products, services and market conditions. The more credible conclusion is that the programme laid substantial groundwork for future action, while many of the longer-term changes to which it contributes remain contingent on what happens next.

## **5.2 Most credible contributions**

### **5.2.1 Building legitimacy and strategic salience**

One of the programme's most credible contributions was to establish child financial harms more clearly as a legitimate issue within relevant institutional settings. The evidence suggests that it helped move the issue beyond fragmented concern and into more substantive policy, regulatory, education and stakeholder discussion. In a field that previously lacked a strong shared platform, this was an important foundational contribution.

### **5.2.2 Strengthening the evidence base and its usability**

A second clear contribution was the development of a more credible and usable body of evidence. The programme did not only generate insight; it helped make that insight usable. Research, consultation and framing work were translated into guidance, training, educational materials, messaging tools and other practical outputs. This is one of the programme's strongest areas of contribution because the evidence is clearest where learning informed materials, practice and decision-making, rather than remaining at the level of general awareness.

### **5.2.3 Translating across sectors and audiences**

The programme also added value by translating a complex and emerging issue across different sectors and audiences. This was evident not only in cross-sector learning within the consortium, but in the way evidence and framing were adapted for policy, education, guidance and parent-facing work. This matters because child financial harms gained traction most clearly when the issue was made actionable for specific audiences, rather than presented as a single abstract concept expected to travel unchanged across settings.

### **5.2.4 Creating cumulative value across the portfolio**

The most credible account of programme contribution is cumulative rather than project-specific. Earlier work informed later activity, and learning was carried through into more applied outputs and pathways. The portfolio created value where evidence, framing and practical development reinforced one another over time. This cumulative quality is one of the clearest reasons the programme mattered at field level, even where individual projects varied in maturity, reach and continuation prospects.

The Ratings tool / Gaming Risk Index is a useful example of this cumulative pattern. It drew together prior research, parent and youth insight, academic expertise and feasibility work, and translated these into a prototype with potential relevance for parents, regulators and wider online safety debates. Its value at this stage lies less in proven downstream impact than in demonstrating how programme learning could be carried forward into a more practical and system-facing asset.

### 5.2.5 Establishing practical pathways and strategic groundwork

The strongest continuation prospects were associated with outputs that had already found routes into practice, particularly where resources or approaches had been incorporated into existing delivery, education or training contexts. This does not support a blanket claim of sustainability across the programme, but it does indicate that some elements have moved beyond pilot or exploratory status and now have clearer prospects for continued use. More broadly, the programme appears to have created a stronger platform from which further institutional, policy and implementation work could proceed, even where longer-term outcomes remain to be secured.

### 5.3 What remains unresolved or insufficiently evidenced

Important uncertainties remain. First, the evidence is weaker on deeper operational change among the actors with the greatest power to alter products, systems and market conditions. The programme appears to have strengthened the visibility and legitimacy of child financial harms more clearly than it secured wider systems change among the highest-leverage actors.

Second, the evidence does not support a uniform conclusion on sustainability. Some outputs appear likely to continue because they have been embedded in existing systems, but the broader coordinating, convening and translation functions that gave the programme much of its value remain more contingent. At the point of evaluation, those functions did not appear to have a fully secured successor arrangement.

This unevenness should not be read simply as a hierarchy of stronger and weaker projects. In several cases, it also reflects different stages of maturity. Some strands were already embedded in delivery systems by the end of the programme, while others were still in prototype, testing or early rollout phases. For these later-stage or more exploratory projects, the key unresolved question is not whether they have already achieved sustained uptake, but whether the interest, evidence and infrastructure now exist to support their next stage of development.

Third, the programme showed constructive adaptation, but portfolio-wide prioritisation, review and strategic discipline were not always equally strong. Agility often added value, but it was not always accompanied by the clarity needed to ensure that adaptation was consistently governed and transparent at programme level.

Fourthly, understanding and uptake of child financial harms remain uneven across the wider ecosystem. The concept appears to work most effectively as a policy and systems frame. Evidence is more limited on how far it is understood, adopted or acted on consistently across all relevant audiences and sectors, particularly beyond those already closely engaged.

Finally, a further unresolved issue concerns the maturity of the evidence base itself. The evaluation is stronger on the existence of credible pathways into child financial harms, and on increased recognition of the issue among engaged stakeholders, than on robust estimates of prevalence, distribution and priority across the wider population. It is not yet possible to conclude with confidence which pathways should be treated as the most important system-wide intervention points, because the available evidence remains uneven across harms, audiences and settings. Existing sources appear partial and fragmented, while broader understanding is constrained by inconsistent measurement and barriers to data sharing. This helps explain why child financial harms can be increasingly visible and institutionally credible, while still being difficult to prioritise consistently at senior policy and operational levels.

## 5.4 Implications

### 5.4.1 Implications for Parent Zone / the consortium

The evidence suggests that the next phase should be shaped by greater clarity about where the programme's value now lies. Some assets appear capable of continuing through embedding in existing systems; others depend on active stewardship, translation and coordination. For Parent Zone and the consortium, the main implication is the need to be explicit about which functions are now best sustained through institutional embedding, and which still require deliberate ownership if value is to be retained and extended.

A second implication is that the consortium is now better placed to use the report externally because the strongest conclusions concern credible contribution rather than broad claims of solved system change. The most useful public and strategic position is therefore likely to rest on the programme having helped define the issue, strengthen the evidence base, and create practical pathways and relationships on which further work can build.

### 5.4.2 Implications for Nominet

For Nominet, the main implication is that consortium-based programme models should be commissioned selectively and with a clear rationale, rather than treated as a default approach. In this case, the model was appropriate to the nature of the issue and helped generate value through coordination, cross-sector learning and cumulative development across the portfolio. The evidence also suggests, however, that such models are demanding: they require time to build trust, sustained coordination, and a timeframe that matches the scale of change being sought.

Where future commissioning depends on a consortium approach, it should therefore be based on a clear assessment that the intended results genuinely require this model and that the conditions for it to work are in place. The findings also point to the need either for a longer investment horizon or for a more explicit post-programme strategy for funding, stewardship and ownership where significant elements are unlikely to be embedded or transferred within the initial funding period.

### 5.4.3 Implications for government / regulators / platforms

For government, regulators and platforms, the evaluation suggests that child financial harms now has sufficient credibility to warrant clearer institutional ownership than was evident at the outset of the programme. The report supports further attention and action, but in measured terms: it does not evidence resolved systems change, and it does not suggest that issue recognition alone is enough.

The next stage depends on translating a stronger evidence base and clearer framing into more concrete operational responses. This includes how child financial harms is addressed within policy, regulation, product design, safety systems, education, guidance and support pathways. It also points to the need for a more systematic evidence architecture, so that future action is informed not only by credible examples and emerging pathways, but by stronger evidence on prevalence, distribution and priority. The evaluation therefore strengthens the case for more explicit institutional response, while also indicating that the scale and form of that response still need to be worked through in ways that are proportionate to the evidence.

### 5.4.4 Implications for the wider ecosystem

For the wider ecosystem, the main implication is that child financial harms can now be treated as a credible systems issue, but not yet as a fully settled or uniformly understood field. The programme has helped strengthen the language, evidence base and practical framing available to different

actors. The next stage depends less on further issue-definition alone and more on whether organisations across the system use that foundation to develop clearer responses, responsibilities and points of coordination.

The evaluation also suggests that future progress will depend on continued translation across audiences and sectors. The evidence supports retaining child financial harms as a useful umbrella and systems frame, while recognising that different audiences will engage more effectively through other more established harms, operational language and specific intervention points. In that respect, the programme's strongest legacy may lie not only in what it delivered directly, but in the extent to which it has made more coherent future action possible.

## 6. Recommendations and Implementation Considerations

These recommendations follow from the evaluation's conclusions and are intended to support the next phase for Parent Zone and the consortium, Nominet, government, regulators and platforms, and the wider ecosystem. They are strategic, prioritised and proportionate to the evidence.

### 6.1 Prioritised recommendations

#### **Recommendation 1. Clarify what should be embedded, actively stewarded, or concluded**

The first priority is to make explicit portfolio-level decisions about which outputs should now be embedded in existing systems, which require active stewardship to retain value, and which should conclude. The evaluation shows that sustainability is uneven: some outputs have clearer continuation pathways, while others depend on coordination, translation or shared stewardship that will not continue automatically after the grant period.

**Lead:** Parent Zone / consortium, with Nominet | **Timing:** Immediate | **Key dependency / risk:** Honest assessment of maturity, ownership and resource needs; risk of trying to continue too much and weakening follow-through.

#### **Recommendation 2. Define and resource a backbone function for the next phase**

If this work is to continue beyond the grant period, the backbone function should be made explicit and resourced accordingly. Coordination, convening, translation, synthesis and relationship management were central to the value created across the programme, but are unlikely to continue at the required level if treated as informal or residual activity. The next phase should therefore identify where this function will sit, what it is expected to do, and how it will be supported.

**Lead:** Parent Zone and Nominet jointly | **Timing:** Immediate to near-term | **Key dependency / risk:** Agreement on host, scope and funding; risk of assuming the function can be absorbed without dedicated capacity, leading to fragmentation or loss of momentum.

#### **Recommendation 3. Build a more systematic evidence architecture for CFH**

Future effort should give higher priority to strengthening the evidence base on prevalence, distribution, priority pathways and the practical conditions for safer data sharing. The evaluation is stronger on credible pathways into harm and improved evidence usability than on robust estimates of scale or priority across the wider population. The next phase therefore needs more systematic evidence, including routine measures where feasible, tighter synthesis, and practical, governed approaches to data sharing.

**Lead:** Government / regulators / platforms, with Parent Zone / consortium and wider ecosystem partners | **Timing:** Near-term to longer-term | **Key dependency / risk:** Institutional buy-in and workable governance; risk of setting an over-ambitious evidence agenda instead of starting with feasible measures and targeted pilots.

**Recommendation 4. Convert strategic legitimacy into more targeted engagement with high-leverage actors**

The next phase should focus less on broad issue recognition alone and more on securing clearer operational engagement from the actors with greatest power to influence products, systems and market conditions. The programme increased the visibility and legitimacy of child financial harms, but the evidence is weaker on deeper leverage with major platforms, direct financial institutions and other high-power actors. The next step is therefore to translate legitimacy into more targeted institutional response, while continuing to adapt the framing and practical offer for different audiences.

**Lead:** Parent Zone / consortium, with government / regulators / platforms | **Timing:** Near-term | **Key dependency / risk:** Clear targeting and sufficient convening credibility; risk of reverting to broad awareness activity without securing operational ownership.

**Recommendation 5. Use consortium-based programme models selectively, and match them to the scale and timeframe of the change sought**

Where future funding considers another consortium-style model, this should be based on a clear case that the intended outcomes genuinely require cross-sector coordination, and on a timeframe and resourcing model that match the scale of change being sought. In this case the model was appropriate and value-adding, but also demanding: it required active coordination, trust-building and a longer horizon than a single short funding phase is likely to support if systemic change is the goal.

**Lead:** Nominet | **Timing:** Longer-term | **Key dependency / risk:** Early design clarity and realistic appraisal of coordination demands; risk of treating consortium working as a default rather than a deliberate strategic choice.

# Annex 1

## *Detailed Findings by Evaluation Question*

### Section structure

Field	Used to capture
Short answer	Narrative to directly answer the evaluation question.
Summary of findings	A concise synthesis of the main patterns, drawing together the relevant sub-question evidence analysed.
Strongest evidence	The best-supported parts of the answer.
Uncertain or limited	Mixed evidence, gaps, or weaker areas.
Implications	Practical implications flowing directly from the findings.

## Working as a consortium

### Evaluation Question 1

What has been learned about the consortium model in terms of membership, structure, processes and coordination, and how might this inform future Nominet programmes?

<p><b>Short answer</b></p>	<p>The evidence suggests that the consortium model added value through the breadth of expertise, credibility and reach that a cross-sector membership could bring, but that these benefits depended on active coordination rather than emerging organically. In practice, the model worked best when diverse membership was matched by a well-resourced backbone function, clear but flexible structures, and collaboration formats suited to different tasks. The main lesson for future Nominet programmes is that consortiums can add strategic value, but only where their coordination demands are recognised and designed for from the outset.</p>
<p><b>Summary of findings</b></p>	<p>Taken together, the evidence points to a consortium model that was useful because it combined complementary expertise from different sectors, but demanding because those differences also created friction. Membership appears to have strengthened the programme's legitimacy, broadened its perspective and enabled knowledge sharing across education, fraud, finance, research, digital design and family support. At the same time, differences in pace, language, incentives and ways of working increased the need for translation, brokerage and day-to-day coordination. The overall picture is therefore not of diversity as an automatic strength, but of diversity as an asset that required active management.</p> <p>This is reflected in the strongest finding across the sub-questions: the consortium was not self-managing. Formal governance and communication structures mattered, including meetings, huddles, workshops, working groups and reporting routines, but they were not sufficient on their own. In practice, the model depended on a central coordinating role to maintain momentum, align specialised partners, manage reporting, and prevent the work from fragmenting into separate organisational silos. As one participant put it, <b><i>“Someone has to set deadlines, convene meetings, chase reporting and hold the pen on the overall process. Had it been left to us without dedicated project management, it just would not have happened.”</i></b></p> <p>The evidence also suggests that the most workable consortium form was layered rather than uniform. Collaboration appears to have been most effective when different formats were used for different purposes: larger forums for shared direction and legitimacy, smaller groups or one-to-one engagement for detailed alignment, and specialist-led workstreams for delivery. This mattered because broad consortium structures were useful for shaping a common agenda, but less effective as the sole mechanism for progressing complex or technical work. The findings therefore point away from an ideal</p>

	<p>of fully devolved, equally shared delivery, and towards a more mediated model in which participation was differentiated, coordinated and adapted over time.</p> <p>A further lesson is that flexibility was valuable, but only when contained within a disciplined structure. The evidence suggests that the agile or test-and-learn approach helped the programme respond to delivery barriers and refine activity, but it did not reduce the need for strong coordination. In this sense, the consortium became more workable not because complexity diminished, but because the programme adapted its structures and ways of working to manage that complexity more realistically.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four areas. First, cross-sector membership added value through legitimacy, specialist expertise, reach and peer learning. Second, these benefits came with clear coordination costs and operational friction. Third, a funded backbone or secretariat function was essential to making the consortium workable in practice. Fourth, the most effective operating model combined formal governance with more flexible, task-focused and brokered collaboration formats rather than relying on full-consortium working alone. These themes recur consistently across the source summaries and provide a solid basis for conclusion.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on which consortium model would be most effective relative to alternative delivery approaches, and it does not provide strong comparative evidence on value for money or management efficiency. There is also only limited basis for causal claims that particular coordination arrangements directly produced better long-term outcomes. Some findings, especially those concerning the limits of the devolved model and uneven engagement from some sectors, are better supported as reported experience than as independently verified fact. As a result, the evidence is stronger for identifying recurring operational lessons than for determining an optimal consortium design.</p>
<p><b>Implications</b></p>	<p>For future Nominet programmes, the findings imply that consortium design should begin with realism about what cross-sector collaboration requires. Diverse membership can add substantial value, but this needs to be matched by funded coordination capacity, clear roles and decision-making arrangements, and processes that support translation across different sector cultures and constraints. The evidence also suggests that collaboration should be designed in layers, with different formats used deliberately for shared direction, detailed alignment and delivery. More broadly, future programmes may benefit from distinguishing between formal consortium membership and looser strategic alignment, since broad inclusion does not always require full partnership to be useful.</p>

## Evaluation Question 2

**What forms of collaboration have taken place across the consortium, how effective have they been, and what learning has emerged from cross-sector working?**

<p><b>Short answer</b></p>	<p>The evidence suggests that collaboration across the consortium took a number of forms, including consortium-wide convening, smaller task-focused engagement, one-to-one working, specialist-led collaboration, shared knowledge infrastructure and follow-on joint activity. These forms appear to have been most effective when they were actively coordinated and used selectively for different purposes, rather than relying on broad collective working alone. Overall, the consortium generated meaningful cross-sector learning and some continued collaboration beyond core delivery, but both effectiveness and learning were uneven and depended on sustained brokerage, translation and coordination.</p>
<p><b>Summary of findings</b></p>	<p>Taken together, the evidence points to collaboration as a layered and adaptive system rather than a single, uniform mode of working. The consortium used a mix of plenary meetings, workshops, advisory exchanges, one-to-one discussions, shared knowledge mechanisms, specialist workstreams and collaborative activity linked to delivery, advocacy and follow-on opportunities. This mattered because the consortium brought together organisations from different sectors with distinct mandates, cultures, vocabularies and operating rhythms. The main lesson is therefore not simply that collaboration happened, but that it had to be designed and mediated if it was to become productive.</p> <p>The evidence suggests that collaboration was most effective when the form matched the function. Broader convening appears to have been useful for trust-building, shared direction and surfacing collective priorities. By contrast, smaller groups, in-person exchange and one-to-one engagement appear to have been more effective for resolving detail, clarifying positions and enabling practical peer learning. This is consistent with a wider finding across the sub-questions: effective cross-sector working depended less on all partners collaborating in the same way, and more on using different formats to support different kinds of work.</p> <p>The strongest evidence of effectiveness lies in learning that moved beyond exchange into outputs, capability and changed ways of framing the issue. Cross-sector input appears to have informed tools, training, guidance, messaging and educational materials, and in some cases improved understanding of what might be feasible in practice. The clearest evidenced example is the jointly developed MHI training, which produced measurable improvements in practitioner confidence and understanding. This supports a measured conclusion that collaboration was not only relational, but at times practically productive. As one participant reflected, “I had no idea of the extent of financial engagement that young people have to deal with online and how easy it is for</p>

	<p>them to find themselves being involved unwittingly. The course has opened my eyes to the potential risks that are there for youngsters...”</p> <p>At the same time, the evidence consistently qualifies this positive picture. Cross-sector learning and collaboration were not frictionless, and they did not spread evenly across all interfaces. The evidence is stronger for learning and joint working across education, fraud and youth-support interfaces than for some tech, design or external stakeholder relationships. There was also progress towards more shared language and framing, but this remained partial rather than fully settled or institutionalised. The overall picture is therefore positive but qualified: collaboration added value where it was deliberately structured and translated into outputs or practice, but neither its effectiveness nor its learning effects can be assumed to have been uniform across the consortium.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four points. First, collaboration took multiple forms and worked best as a differentiated model rather than a single consortium-wide forum. Second, cross-sector learning did occur and was most clearly evidenced where it informed outputs, training, tools or practical decision-making. Third, the most convincing learning was about operational realities, sector constraints and feasible intervention points, rather than simply the exchange of general information. Fourth, some collaboration and relationship strength extended beyond core delivery into follow-on activity, mutual endorsement, joint advocacy and selective funding-related opportunities. These themes recur consistently across the sub-question evidence and provide the firmest basis for judgement.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on the comparative effectiveness of different collaboration formats, and does not allow strong claims that any one model was consistently superior or more cost-effective than others. It is also weaker on the breadth and durability of learning across the full consortium, particularly in relation to some tech/design partners and external stakeholders. Progress towards shared terminology appears real but incomplete, and the evidence does not support a strong claim that a fully agreed or widely embedded common language emerged. More generally, much of the evidence remains self-reported or inferred from outputs, so the conclusions are stronger on recurring operational patterns than on long-term institutional change or causal attribution.</p>
<p><b>Implications</b></p>	<p>For future Nominet programmes, the findings suggest that cross-sector collaboration should be designed as a differentiated system rather than a single shared forum. Broad convening appears useful for legitimacy, trust-building and shared direction, but effective delivery and learning are more likely to depend on smaller, task-specific and brokered forms of engagement. The evidence also suggests that learning should be treated as an active programme objective, with deliberate mechanisms to translate cross-sector insight into outputs, practice and decision-making. Finally, if future programmes want collaboration to endure beyond funded delivery, it may be more realistic to track a broader set of outcomes, including strengthened working</p>

	relationships, follow-on activity and strategic alignment, rather than relying mainly on formal joint ventures as the main marker of success.
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### Evaluation Question 3

**What added value has the consortium model generated through funding, relationships and wider connectivity, and what gaps or future coordination needs remain?**

<b>Short answer</b>	The evidence suggests that the consortium model generated added value primarily by combining funded coordination, cross-sector relationships and wider external connectivity, rather than through formal expansion alone. This appears to have strengthened the programme’s ability to convene relevant actors, generate follow-on activity and influence wider agendas on child financial harms. At the same time, important gaps remained in operational leverage with major platforms and direct financial actors, specialist capability in emerging risk areas, and long-term stewardship beyond the funded period.
<b>Summary of findings</b>	<p>Taken together, the evidence points to the consortium model creating value through a particular combination of assets: a funded backbone function, trusted relationships across sectors, and outward-facing connectivity that extended beyond the formal consortium itself. The strongest evidence is not that the model removed all coordination or influence barriers, but that it created a credible platform from which the programme could convene stakeholders, connect into external systems and increase the visibility of child financial harms in wider policy and practice discussions. This included engagement with bodies such as MaPS, Ofcom and government stakeholders, with effects evidenced in consultancy input, refreshed materials, commissioned research and agenda-setting activity. In this sense, the added value of the consortium lay as much in the access and legitimacy it created as in the formal composition of the partnership.</p> <p>The evidence also suggests that this added value was uneven and bounded by clear functional gaps. The main issue was not simply who was absent, but where the consortium lacked the forms of influence, capability or holding power needed to move from visibility to wider systems change. The clearest gaps concerned stronger engagement from major tech platforms, more operationally useful relationships with direct financial institutions, additional cyber and AI expertise as risks evolved, and greater parent-facing representation and delivery capacity. As one participant observed, <b>“we may have had [...] success if we’d partnered with a bank... like the work that NatWest did when they were part of the Money and Pension Service roundtable....they seconded people to do research around children and digital</b></p>

	<p><b>money”</b>, which captures the wider lesson that sector representation in principle does not always translate into operational leverage in isolation.</p> <p>A further theme across the evidence is that relationship strength and wider connectivity did not in themselves resolve the question of future coordination. While the programme appears to have built relational capital and ongoing external connections, the evidence does not show that a new organisation has already emerged to take on the coordinating or backbone role. Instead, it points to several plausible pathways, including continued coordination by Parent Zone if resourced, partial convening by bodies such as MaPS, or the creation of a new dedicated structure. The central finding is therefore less about spontaneous succession and more about the continued need for deliberate stewardship, funding and mandate.</p> <p>The evidence also qualifies the extent of wider connectivity within Nominet’s own funded ecosystem. While CFH clearly interacted with external organisations and appears to have influenced their thinking, materials and agendas, the source base does not provide clear, named examples of operational collaboration with other Nominet-funded programmes or projects. The model’s wider value therefore appears to have been realised mainly through outward-facing system engagement rather than documented cross-portfolio integration. Overall, the consortium model appears to have generated meaningful strategic value through funding, relationships and connectivity, but that value remained dependent on active coordination and did not resolve longer-term questions about institutional ownership.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four points. First, the consortium created value through funded coordination and cross-sector relationships that supported wider external engagement and influence. Second, its clearest connectivity effects were outward-facing, particularly in relation to regulators, government and sector bodies, rather than to other Nominet-funded programmes. Third, key gaps remained in high-leverage engagement with major tech platforms and direct financial actors, as well as in cyber and AI capability and longer-term stewardship. Fourth, there is no clear evidence that a successor coordinating organisation has already emerged, and future coordination appears to depend on explicit decisions about funding, governance and mandate.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on the relative weight of different forms of added value, and does not allow a firm judgement on which relationships or external connections produced the greatest practical effect. It is also weaker on whether stronger representation from missing actors would have changed outcomes materially, and on whether informal interaction with other Nominet-funded programmes may have occurred without being captured in the available summaries. Some conclusions about future coordination pathways are necessarily tentative, because the evidence is perceptual and forward-looking rather than based on confirmed transition plans or resource commitments. As a result, the findings are stronger on recurring gaps and coordination needs than on the optimal institutional solution for the next phase.</p>

<b>Implications</b>	For future Nominet programmes, the findings suggest that the added value of a consortium should be understood in terms of leverage, connectivity and coordination capacity, not simply breadth of membership. If the aim is to influence systems, products or institutional practice, programmes may need more direct relationships with specific firms, stronger access to specialist technical expertise, and clearer mechanisms for converting sector presence into operational change. The evidence also suggests that relationship-building and external connectivity are valuable, but do not remove the need for funded coordination and deliberate long-term stewardship. More broadly, if Nominet wants cross-programme learning or portfolio-level collaboration to be part of the model's value, this may need to be designed more explicitly rather than assumed to emerge through shared funding alone.
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## Taking an agile/iterative approach

*Paste the publication-ready synthesis for each revised evaluation question below.*

<b>Evaluation Question 4</b>
<b>To what extent is cumulative knowledge developing across the projects, including learning loops, transfer and reuse or iteration?</b>

<b>Short answer</b>	The evidence suggests that cumulative knowledge is developing across the CFH projects, with clear examples of learning loops, transfer, reuse and iteration across multiple strands of work. This appears to have been strongest where projects were deliberately sequenced, where shared assets such as research and messaging were designed for reuse, and where pilots, feasibility work and prototypes created opportunities for refinement. However, the evidence suggests that this cumulative learning was more evident within and between particular projects than as part of a consistently embedded portfolio-wide learning system. Its spread and consistency were at times limited by administrative burden, uneven follow-through, and the absence of routine mechanisms for capturing and reusing learning.
<b>Summary of findings</b>	Taken together, the evidence points to a programme in which cumulative knowledge was developing in substantive and repeated ways, but not yet through a fully embedded portfolio learning system. The clearest pattern is that projects did not operate as isolated strands. Instead, earlier research, polling, narrative work and pilot activity were used to shape later design, messaging, delivery and technical development. This suggests that cumulative knowledge developed not simply through proximity between projects, but through deliberate sequencing and the active use of earlier outputs to inform later decisions.

	<p>A central feature of this cumulative learning was the role of bridging assets and staged development. Narrative and messaging work appears to have functioned as shared infrastructure across the portfolio, supplying framing, concepts and tools that could be reused in later parent engagement, polling and ratings work. At the same time, pilot, feasibility and prototype phases created practical learning loops by allowing projects to be tested, adjusted and carried forward in more refined forms. The evidence suggests, for example, that learning from the Youth Experience work informed later strands of activity, including the parent consultation and the education programme. It also indicates that the Ratings Tool work developed iteratively, moving from feasibility work into prototype development and testing. Together, these examples suggest that cumulative knowledge was not simply being generated, but was in a number of cases being applied in later work.</p> <p>The evidence also indicates that these processes were strongest where transfer and reuse were actively engineered. Learning appears to have moved most effectively where projects were intentionally linked, where timing allowed one strand to inform another, and where shared artefacts or coordination mechanisms helped carry insight across workstreams. This included both project-level learning and some strategic-level adaptation, such as movement from an initial Theory of Change towards a more flexible Outcomes Pathway. At the same time, interview material suggests that learning often travelled through individuals, coordination work and practical workarounds rather than through a stable programme-wide system for routine synthesis and redeployment.</p> <p>Overall, the evidence supports a measured conclusion that cumulative knowledge was one of the programme's clearer strengths, but that its institutionalisation remained partial. The evidence is stronger on where learning clearly transferred, where reuse was intentional, and where iteration was built into delivery. It is weaker on failed or incomplete learning loops, on the exact changes made through iterative refinement in every case, and on whether reused knowledge travelled into wider sustained practice beyond the consortium core.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four areas. First, projects were deliberately sequenced so that earlier research, narrative work and insight could shape later delivery. Second, pilot, feasibility and prototype stages provided clear mechanisms for iteration and refinement. Third, shared strategic assets, especially messaging, narratives, typologies and research findings, were reused across multiple projects. Fourth, there are concrete examples of cumulative knowledge feeding into later outputs, including education materials, parent engagement activity and ratings-tool development. These are the most consistently evidenced features across the three linked sub-questions.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on how systematic this cumulative learning was across the full portfolio, and whether it amounted to a durable programme-wide learning system rather than a set of strong but uneven practices. It is also weaker on failed or partial learning loops, on exactly what changed within some iterated products, and on the long-term downstream adoption of reused knowledge beyond the core programme. Some conclusions about where learning did not transfer remain evidence-informed but partly</p>

	inferential, because the source material is stronger on intended and successful reuse than on non-transfer or weak uptake. As a result, the evidence supports a measured conclusion about substantial cumulative development, but not a claim of fully institutionalised portfolio learning.
<b>Implications</b>	The findings suggest that cumulative knowledge is most likely to develop where learning is designed into the programme rather than assumed to emerge through proximity alone. This implies the value of sequencing projects intentionally, creating shared assets early, and retaining pilot, feasibility and prototype phases that allow knowledge to be tested and refined before scaling. The evidence also suggests that stronger portfolio-level learning would require more explicit mechanisms for reflection, synthesis and redeployment, alongside lighter administrative barriers and better tracking of whether learning is actually embedded in later work. More broadly, future programmes may benefit from documenting not only that reuse or transfer occurred, but also what changed as a result and whether those changes endured beyond the immediate project cycle.

### Evaluation Question 5

**How sustainable is the consortium approach and the individual projects, and what is required to sustain what has been developed?**

<b>Short answer</b>	The evidence suggests that sustainability across the CFH programme is uneven and depends on different conditions at consortium and project level. The consortium approach does not appear likely to continue through goodwill or informal relationships alone; it requires a funded backbone function, a credible host and ongoing resource for coordination, visibility and maintenance. At project level, sustainability is strongest where outputs have been embedded into existing statutory, training or service systems, and weakest where continuation depends on active stewardship, further technical development, unresolved ownership or additional investment.
<b>Summary of findings</b>	<p>Taken together, the evidence points to a differentiated rather than uniform picture of sustainability. Across both the consortium and the individual projects, the key issue is not simply whether activity was valued, but whether it has a durable institutional home, a realistic delivery route and a manageable ongoing resource requirement. Sustainability therefore appears to depend less on momentum alone than on whether what has been developed can be absorbed into existing systems or supported through explicit post-programme arrangements.</p> <p>At consortium level, the evidence suggests that sustainability is unlikely without deliberate stewardship. The coordinating or backbone role emerges as central to the</p>

	<p>way the model functioned in practice: convening partners, maintaining momentum, following up actions, drafting outputs and holding coherence across sectors. This function does not appear capable of being sustained through dispersed partner effort alone. Rather, continuation would require paid coordination capacity, a named and legitimate host, and funding for the connective work that sits between projects. While several possible future hosts were identified, the evidence does not indicate that a confirmed successor arrangement or funded handover was in place. The consortium model itself therefore appears contingent rather than secure.</p> <p>At project level, sustainability is more mixed but follows a clearer pattern. The most durable projects are those that have already been embedded into existing systems. Education and training work appears to have the strongest continuation pathway because it aligns with established infrastructure such as PSHE, curriculum-linked delivery and practitioner or volunteer training routes. Some organisational changes and guidance also appear likely to persist where they have moved into business-as-usual practice. As one participant reflected, “now that financial education has come on the curriculum, it’s going to have a legacy... That’s going to have legs.”</p> <p>By contrast, the evidence suggests that technical tools, cross-cutting assets and projects that still depend on legal resolution, commercialisation decisions, further development or active cross-sector coordination are materially more fragile. A similar distinction applies between what may continue in reduced form without funding and what is unlikely to do so. Discrete and embeddable outputs, such as some curriculum-linked materials, training resources and elements of family-hub-linked parenting support, may continue where delivery channels already exist. However, backbone coordination, active research translation, convening, visibility work and broader parent engagement appear unlikely to continue at the same level without dedicated funding. As one participant put it, “no one’s stepping forward to say, hey, we will fund you to do that.”</p> <p>Overall, the evidence supports a measured conclusion that sustainability is strongest where outputs have already crossed into established systems, and weakest where continuation depends on shared infrastructure, specialist stewardship or unresolved funding and ownership questions. The programme appears to have created assets with different sustainability profiles rather than a single sustainable whole. Some elements are likely to endure, but the consortium’s connective capacity and the more innovation-dependent strands remain vulnerable unless explicit post-funding arrangements are put in place.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four points. First, the consortium approach requires a funded backbone function, a credible host and ongoing resourcing for coordination and maintenance if it is to continue. Second, project sustainability is uneven and is strongest where outputs have been embedded into statutory, training or existing service systems. Third, education and training projects have the clearest continuation routes, while technical pilots and tools appear the least secure without further investment and ownership decisions. Fourth, many of the functions that made the programme connective and visible, including convening, coordination, research translation and</p>

	cross-sector stewardship, are unlikely to continue at the same level without dedicated funding.
<b>What remains uncertain or limited</b>	The evidence is more limited on the practical shape of any future sustainability model. It does not identify a confirmed successor host, costed governance model, funded handover package or long-term ownership arrangement for the consortium as a whole. At project level, the evidence is stronger on likely pathways than on confirmed continuation: there is limited evidence of secured post-programme funding, formal handover agreements, large-scale uptake data or long-term tracking of use. There is also some uncertainty around boundary cases, particularly family-hub and parenting work, the lasting influence of research outputs, and the future of technical assets that appear promising but remain dependent on deliberate investment and stewardship.
<b>Implications</b>	The findings suggest that sustainability planning should distinguish clearly between outputs that can be embedded and functions that must be actively financed. For future programmes, this implies designing from the outset for integration into statutory, training or service infrastructure wherever possible, while also identifying early which elements will require ongoing ownership, maintenance and post-grant funding. If funders want consortium-level collaboration, research translation, parent engagement at scale or shared technical assets to continue, these will need named hosts, explicit governance and dedicated resource beyond the innovation phase. More broadly, the evidence suggests that sustainability should not be treated as a single end-state, but as a set of different continuation conditions across different kinds of work.

## Evaluation Question 6

**To what extent have projects continued to work towards their intended end goals, how and why have goals changed over time, and what does this imply for the Theory of Change?**

<b>Short answer</b>	The evidence suggests that most projects continued to work towards their intended end goals, but often through adaptation rather than linear delivery against fixed initial plans. Changes to goals, scope, timing and methods were usually responses to learning, external change, technical constraints, legal risk or stakeholder realities rather than simple drift, although some participants also experienced the wider portfolio as diffuse. Overall, the findings suggest that the Theory of Change should continue to evolve away from a rigid linear model towards a more adaptive Outcomes Pathway that makes assumptions explicit, reflects system complexity, and supports clearer prioritisation, review and implementation.
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### Summary of findings

Taken together, the evidence points to a programme in which projects generally remained oriented towards their intended end goals, but did so through a pattern of iterative adjustment rather than stable delivery against fixed starting assumptions. Across the portfolio, changes to goals and methods were driven by a combination of internal learning and external constraint. In broad terms, the evidence suggests that these changes were more often purposeful adaptations than uncontrolled drift. However, it also indicates that this was easier to see at project level than across the portfolio as a whole, where the breadth of activity and number of concurrent experiments sometimes made the overall strategic logic harder to hold clearly in view.

A consistent pattern across the evidence is that different pressures changed projects in different ways. Internal learning appears to have supported constructive refinement: resequencing work so one strand could inform another, improving methods, adjusting collaboration formats, and strengthening coherence between related activities. External conditions more often acted as forcing factors, prompting delays, scope reduction, pauses, redesign or workarounds in response to regulatory change, stakeholder sensitivity, technical complexity, vendor reluctance and the emergence of AI-related issues. This distinction matters because it suggests that the programme was not simply changing direction unpredictably; rather, it was responding to both generative learning and real-world constraint within an agile model that allowed recalibration.

The clearest examples of appropriate adaptation are where projects narrowed, phased or adjusted their ambitions without abandoning their underlying purpose. Technically complex strands such as the Ratings Tool and Currency Converter appear to have moved into feasibility or proof-of-concept modes when fuller delivery proved unrealistic within programme conditions. Elsewhere, methods changed while strategic intent remained broadly intact, for example where interviews became desk research, broad workshops gave way to one-to-one engagement, or timelines were extended so narrative and polling work could shape later activity. These examples suggest that adaptation often helped preserve strategic purpose under changing conditions rather than signalling failure to pursue end goals.

At the same time, the evidence qualifies how well this adaptive approach was governed at programme level. Interview material in particular suggests that the portfolio's breadth, the administrative burden attached to staged funding and approvals, and the absence of sufficiently explicit strategic review moments sometimes made it difficult to distinguish clearly between productive agility and perceived drift. As one participant reflected, "The things that really play to the strengths of having a multidisciplinary consortium where it started to drift. I think if it drifted... there weren't those agile moments built in." This does not overturn the wider finding that adaptation was often appropriate, but it does suggest that agile change was not always matched by equally strong collective mechanisms for reprioritisation, focus and decision-making.

These findings point directly to the implications for the Theory of Change. The evidence suggests that the original framework was useful, but too linear and insufficiently explicit in some of its underlying assumptions. It had already begun to evolve into an Outcomes Pathway during programme delivery, and the direction of travel appears well supported

	<p>by the evidence. Future iterations would benefit from going further by making key assumptions explicit and testable, particularly around consortium governance, backbone coordination, industry engagement, parental support, knowledge transfer, sustainability and the limits of agility under staged funding. The framework also appears to need stronger operational value: not only as a framing device, but as a live guide to prioritisation, delivery, review and implementation. In that sense, the evidence suggests that the Theory of Change should evolve from a broad statement of intended change into a more usable model of how change is expected to happen under real system conditions.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four areas. First, most documented changes to projects were purposeful adaptations rather than uncontrolled drift. Second, internal learning and external context both drove change, but in different ways: learning mainly supported refinement and resequencing, while external pressures more often forced scope reduction, redesign or delay. Third, technically complex projects adapted through phased development or reduced ambition rather than false completion. Fourth, the original Theory of Change had already begun to evolve into a more adaptive Outcomes Pathway, and the case for continuing that evolution is strongly supported across the evidence.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on whether all significant goal changes were formally recorded, approved and reviewed in a consistent way across the portfolio. It is also weaker on whether every adaptation improved eventual outcomes, and on how far apparent adaptation may in some cases have masked reactive mitigation of delivery difficulties. More generally, the documentary sources are stronger on describing changes than on providing a full audit trail of re-scoping decisions, while interview evidence is stronger on perception, governance constraints and practical judgement than on formal confirmation. The evidence is therefore stronger on the broad pattern of adaptation and the need to evolve the Theory of Change than on the exact frequency, quality or downstream effect of every individual goal change.</p>
<p><b>Implications</b></p>	<p>The findings suggest that future programmes operating in fast-moving policy and technology environments should retain the capacity to adapt, but pair that flexibility with clearer strategic review points and more transparent rules for when goal change reflects learning rather than drift. They also suggest that the Theory of Change should be treated less as a static statement of intent and more as a live operating framework, with explicit assumptions, clearer implementation pathways, defined workstreams and stronger links to delivery, governance and sustainability. More broadly, if agile programmes are expected to respond to both learning and external shocks, then decision rights, approval processes and funding mechanisms need to be designed to support timely and proportionate recalibration rather than slowing or distorting it.</p>

## Overarching outcomes

### Evaluation Question 7

**Is there evidence of increased wider-sector interest in CFH, including stakeholder engagement, research and evidence generation, media attention, and political attention?**

<p><b>Short answer</b></p>	<p>The evidence suggests that wider-sector interest in CFH has increased, particularly in policy, regulatory, education and parliamentary-adjacent contexts. The strongest evidence is for increased stakeholder engagement, a more substantial and visible evidence base, and growing political and institutional attention. Evidence of increased media attention is more qualified: CFH-related issues appear to have gained profile, but the available evidence does not demonstrate a measured increase in media coverage of CFH itself.</p>
<p><b>Summary of findings</b></p>	<p>Taken together, the evidence points to CFH moving from a relatively niche concern towards a more recognised cross-sector issue, although that increase in interest has been uneven across sectors and forms of attention. The clearest pattern is that engagement has deepened most where stakeholders have clear policy, statutory or practice-related reasons to engage. Regulators, government departments, education bodies and some public-service organisations appear increasingly to have sought evidence, briefings, terminology and practical guidance. The strongest signs of traction lie not simply in expressions of interest, but in evidence being cited, requested, discussed and used within strategies, guidance, implementation activity and formal engagement processes. Wider-sector interest is therefore most convincingly evidenced where attention appears to have moved into some form of use.</p> <p>This increase in interest also appears to have been supported by the growth of a broader and more usable evidence base. Across the programme and the wider field, CFH-related evidence now includes mapping, polling, qualitative consultation, narrative work, literature reviews, technical analysis, academic research and applied evidence for policy, education and guidance. The significance of this is not only that more material exists, but that stakeholders appear to have had more credible evidence on which to act. The programme therefore seems to have contributed both to raising attention and to strengthening the evidence architecture that made that attention more actionable.</p> <p>At the same time, the evidence suggests that this increased interest should not be interpreted as uniform system-wide adoption. Traction appears strongest where CFH aligns with existing agendas such as online safety, fraud, gambling-related harms, education and digital financial capability. It is less consistently evidenced as broad uptake of CFH as a single umbrella concept, and weaker in relation to major banks, platform companies and some private-sector actors. This suggests that wider-sector</p>

	<p>interest has often developed through specific harm strands and operational concerns rather than through full consolidation around the CFH framing itself.</p> <p>The evidence on media and political attention is similarly positive but differentiated. Political and parliamentary-adjacent attention appears to have increased through ministerial briefings, parliamentary events, select committee-related activity, direct MP engagement and the incorporation of CFH-related material into policy and government-facing outputs. Media attention is less firmly evidenced. There are signs of growing profile and public debate around CFH-aligned issues such as money muling, gamblification, loot boxes and commercial influence, but the source base does not support a firm claim of a measured increase in media coverage of CFH as a named construct. Overall, the most defensible conclusion is that CFH has gained wider salience and institutional attention, but that this is more strongly evidenced in stakeholder, research and political domains than through systematic media metrics or broad private-sector buy-in.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four areas. First, there is clear evidence of increased engagement from regulators, government departments, education bodies and other public-service actors. Second, a substantial mixed-method evidence base has been developed, and this appears to have supported wider uptake and use of CFH-related findings. Third, political and parliamentary-adjacent attention has increased through briefings, events, invitations and policy uptake. Fourth, the strongest evidence of wider-sector interest lies in institutional signals such as citations, requests for evidence, strategy references, guidance changes and role creation, rather than in general claims of raised awareness.</p>
<p><b>What remains uncertain or limited</b></p>	<p>The evidence is more limited on the scale, durability and distribution of that increased interest. It is weaker on hard quantitative measures such as inbound demand over time, repeat engagement, budget commitment or sustained operational take-up. Evidence of media growth is especially limited, as the available material does not include systematic media monitoring, time-series comparison or robust coverage data. The evidence is also weaker on broad and consistent engagement from major banks and platform companies, and on the extent to which increased interest reflects the consortium's influence specifically as opposed to wider shifts in concern about online safety, fraud and youth digital risk. As a result, the findings are stronger on the existence of increased attention than on its exact scale, attribution or durability.</p>
<p><b>Implications</b></p>	<p>The findings suggest that CFH now has a stronger platform for wider-sector engagement than earlier in the programme, particularly where there are clear policy hooks, statutory duties or evidence gaps that stakeholders need help to address. Future strategy should therefore build on the areas where demand appears most developed, especially regulator-facing evidence, education-system implementation and operational guidance. At the same time, the unevenness of engagement suggests the need for more targeted strategies in sectors where traction remains weak, particularly finance and platform actors. More broadly, if future evaluation is expected to evidence changes in</p>

	wider visibility more robustly, it will require stronger tracking of stakeholder demand, media attention and political engagement over time, rather than relying mainly on qualitative and documentary signals.
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### Evaluation Question 8

**How well is CFH understood and defined by key stakeholders, how has the definition evolved, and where does the framing of CFH land or not land?**

<b>Short answer</b>	The evidence suggests that understanding of CFH is strongest among engaged policy, regulatory and education stakeholders, and weaker among parents, young people, frontline practitioners and some industry actors. Across the evidence base, recognition of specific pathways into harm appears more developed than uptake of a single shared definition, and the concept has evolved mainly through sharper practical framing and external uptake rather than through formal redefinition. The framing lands best as a policy and systems-level concept, but less well as a standalone public-facing label unless it is translated into concrete harms, child wellbeing and practical examples.
<b>Summary of findings</b>	<p>Taken together, the evidence points to CFH becoming more established as a cross-sector concept, but not uniformly understood or equally useful across all audiences. The clearest pattern is that understanding is strongest among stakeholders already working in policy, regulation, education and related systems settings, where CFH has increasingly been used in briefings, guidance, institutional discussion and policy-facing activity. In these contexts, the concept appears to have gained enough clarity and legitimacy to function as a useful organising frame. However, this does not amount to a fully shared understanding across the wider ecosystem. The evidence suggests that understanding remains more partial among non-specialist audiences, some frontline practitioners and some industry actors, and that many stakeholders recognise the constituent harms more readily than the umbrella concept itself.</p> <p>A central theme across the evidence is that CFH has evolved more in practice than in formal definition. The consortium appears to have retained a broad working definition while prioritising translation, action and audience-specific framing over an extended process of formal definitional closure. As one participant put it, “We’ve not kind of put it out to consultation... we’ve sort of said this is our working definition...” Over time, the concept appears to have become more operational and more legible through stronger emphasis on concrete pathways such as scams, money muling, gaming monetisation, sextortion, digital money and the wider digital enabling environment. External uptake by bodies such as Ofcom and other institutional actors appears to have reinforced this shift by helping make the concept more visible and more usable. The overall pattern is</p>

	<p>therefore one of evolution in framing, emphasis and external recognition rather than a neatly revised settled definition.</p> <p>The evidence also suggests that where the framing lands depends heavily on audience and mode of communication. This interpretation is reinforced by the December 2024 messaging guide produced through the programme’s narrative work. While the guide should be treated as an artefact of project learning rather than as evidence of external uptake, its structure and recommendations align closely with the wider findings: it seeks to build common language around CFH, provides audience-specific guidance for media and policy audiences, and advises communicators to lead with familiar contexts, concrete harms and support for parents rather than abstract terminology alone. This lends further support to the conclusion that the framing required active translation rather than expecting the umbrella term to travel on its own. CFH appears to work best as a broad systems-level frame for policy, regulatory and institutional audiences, where its breadth is useful because it brings together harms that are often treated separately. That same breadth appears to make it less effective as a public-facing label. For parents, young people and some frontline audiences, the umbrella term often seems too abstract unless it is translated into concrete harms, practical situations and morally legible language. The evidence is especially consistent that terms such as money muling, money manipulation or the monetisation of childhood are more resonant than CFH on its own, and that framing around wellbeing, agency, fairness and practical examples is more readily understood than technical or purely economic language. This suggests that the issue is not that CFH is conceptually weak, but that it is not self-explanatory.</p> <p>This also helps explain why understanding is stronger for pathways than for definition. Stakeholders appear increasingly able to identify visible routes into harm, but terminological inconsistency remains a barrier to shared understanding. Terms such as fraud, scams and financial harm are still used unevenly, and some audiences continue to interpret the issue through narrower, more familiar categories. Parents, for example, may recognise specific online risks while still holding a relatively limited understanding of the full range of harm involved. Overall, the evidence supports a measured conclusion that CFH is more established as a policy and systems concept than at the start of the programme, but that its definition remains deliberately broad and its wider resonance depends on translation for different audiences.</p>
<p><b>What the evidence is strongest on</b></p>	<p>The evidence is strongest on four areas. First, CFH is better recognised among engaged policy, regulatory and education stakeholders than among wider grassroots, frontline or industry audiences. Second, understanding of specific pathways into harm is more developed than uptake of a single shared umbrella definition. Third, the concept appears to have evolved through shifts in framing, emphasis and external uptake rather than through a formally agreed rewritten definition. Fourth, the framing lands most effectively with policy and institutional audiences, while public-facing communications work better when they lead with concrete harms, wellbeing, agency and practical examples.</p>

<b>What remains uncertain or limited</b>	The evidence is more limited on how far understanding extends beyond already engaged stakeholders, and there is weak evidence on systematic unaided understanding across representative samples of parents, teachers, frontline practitioners, banks or platform teams. It is also weaker on formal textual change, since the evidence supports evolution in framing and use more clearly than a documented before-and-after redefinition. More generally, the evidence is stronger on direction of travel and audience differences than on the precise prevalence, consistency or durability of understanding across the full ecosystem. It is also limited in showing exactly which public-facing label should consistently replace or accompany CFH across different contexts.
<b>Implications</b>	The findings suggest that future work should retain CFH as a useful umbrella and systems frame, but not assume that the term will travel effectively without translation. For policy, regulatory and institutional audiences, the current framing appears strong enough to retain and build on. For parents, young people, frontline practitioners and some industry audiences, communications are more likely to succeed if they use shorter, audience-specific operational definitions and lead with concrete harms, wellbeing, agency and practical examples. More broadly, the evidence suggests that future effort should focus less on securing a single definitive formulation and more on improving segmented understanding, frontline upskilling and audience-specific messaging that links visible harms back to the wider CFH model.

## Annex 2

### *Evidence of wider sector uptake, recognition and influence*

Evidence Item	Date	Evidence Type	What it shows	Verification Status	Updated Notes / Caveats
Ofcom Advisory / Literature Review	Nov 2025	Third-party report	Direct citation of consortium research 1-4	Confirmed	Provides high-authority validation of CFH risks to children.
MaPS Digital Financial Literacy Review	July 2024	Literature review	Identifies gaps in common definitions and highlights "gamblification" risks. 1, 5, 6	Confirmed	Validates the core thematic focus and sectors addressed by the consortium.
Ofcom Persuasive Design / CFH Work	June 2025	Policy report	Explicitly adopts the term "Child Financial Harms" in the title and scope. 7-9	Confirmed	High conceptual uptake by the UK regulator using consortium terminology.
Updated RSHE Guidance	2025	Guidance / policy	Embeds financial and media literacy into the national school curriculum. 7, 10	Confirmed	Direct policy alignment; cited as a response to risks identified by partners.
Home Office Fraud Strategy 2026-2029	March 2026	Govt Strategy	Cites Crest Action Plan and Parent Zone; names Children's Society as a partner. 2, 11-13	Confirmed	Flagship evidence. Direct policy commitment to victim referral pathways.
BPS Digest on gambling mechanics	Feb 2026	Media digest	Wide discussion of virtual gambling mechanics and "gamblification." 11, 14	Supported	Strong contextual alignment with consortium themes regarding in-game harm.
Children's Commissioner Report	Feb 2026	Public report	Highlights children's exposure to commercial influence and illegal advertising. 15, 16	Supported	Contextual evidence of commercial pressure on children's self-esteem.

KCL Child & Teen Consumption Conf.	April 2026	Sector event	Explores boundaries of marketing and children's agency in the digital economy. 15, 17	Supported	Strong signal of academic and sector demand for CFH expertise.
Sydney Univ / ACM Research	2024-25	Academic research	Regulatory precedent (ACM fine on Epic Games) and "child gambling" analysis. 18-20	Supported	Provides international regulatory weight against unfair commercial practices.
Financial Inclusion Strategy	n/k	Strategy / policy	N/A	Unverified	No direct source file provided in the bundle to verify claims. 18

## Annex 3

### *Project Landscape and Contribution: Project by Project Summary*

Project	Purpose / Focus	Progress / Status	Outputs and apparent contribution	Confidence in evidence base	Connectivity	Sustainability
<b>Landscape Mapping</b>	Map the CFH ecosystem and identify opportunities for systemic change.	Completed.	Produced mapping reports, surveys and interviews; appears to have provided the early strategic picture that shaped later commissions and programme direction.	Moderate	Foundational to later policy and education work.	Likely to persist as a strategic reference, having been absorbed into programme thinking rather than as a stand-alone live asset.
<b>National Fraud Database Process and Support</b>	Improve the journey and support available to children recorded on the Cifas National Fraud Database.	Completed.	Produced user journey mapping, opportunity areas and guidance changes; appears to have contributed to amended Cifas guidance, improved signposting and the creation of an internal CFH lead role.	Higher	Strong cross-sector collaboration between Cifas and Reason Digital; one of the clearest early system-facing projects.	Strong, because changes appear embedded in Cifas guidance and organisational practice.
<b>CFH Stakeholder Engagement (2023)</b>	Convene senior cross-sector stakeholders to test assumptions, build awareness and identify opportunities.	Completed.	Produced the Connecting the Dots event and follow-up materials; appears to have helped validate the issue, test early framing and widen the programme's network.	Higher	Connected early mapping to later policy, support and consortium activity.	Mainly relational; likely to persist through networks and follow-on collaboration rather than as a continuing delivery asset.
<b>Young People's Experience</b>	Generate direct evidence on children and young people's experiences of CFH.	Completed.	Produced consultation and polling reports plus stakeholder briefings; appears to have provided a core evidence base	Higher	Strongly connected across the portfolio and used in external briefings.	Likely to persist as a cited evidence asset, though active influence depends

			on normalisation of harm and informed later education, parent and advocacy work.			on continued use in advocacy and delivery.
<b>Policy and Regulation Mapping</b>	Clarify the regulatory landscape, grey areas and routes for policy influence.	Completed.	Produced a policy mapping report, stakeholder list and action plan; appears to have strengthened the consortium's policy framing and identified clearer advocacy routes.	Higher	Linked research to later education, advocacy and parliamentary work.	Promising as an advocacy framework, but longer-term value depends on continued policy engagement and political opportunity.
<b>Parent Consultation</b>	Understand parents' perceptions, experiences and intervention challenges in relation to CFH.	Completed.	Produced focus groups, a policy note and briefings; appears to have clarified parental knowledge gaps and informed later parent-facing and policy work.	Higher	Closely linked to youth research, the Parent Poll and later creative work.	Likely to persist mainly through policy influence and reuse of insights rather than as an active ongoing project.
<b>Child Financial Harms Education Programme</b>	Create a preventative education offer for schools to build awareness and resilience.	Embedded and live in schools.	Produced lesson plans, teacher training, videos and supporting materials; appears to have created the clearest practical route for preventative school-based action, with evidence of early uptake, including reported reach across schools and educators during the programme period.	Higher	Strongly connected to earlier youth and parent insight and launched through wider programme advocacy.	Strong, because resources are aligned to existing PSHE infrastructure and appear embedded in established delivery channels.
<b>Narratives</b>	Develop a clear and usable messaging framework for communicating CFH.	Completed.	Produced a messaging guide, audience typology and supporting materials; appears to have improved coherence and usability of CFH	Higher	A key bridging asset for the Parent Poll, Parent Engagement Creative Response	Reasonably strong as a published toolkit that can continue to be reused, though active influence

			communications across the portfolio.		and Support Mapping.	depends on ongoing uptake.
<b>Parent Poll</b>	Produce nationally representative quantitative evidence on parental experience of CFH.	Completed.	Produced nationally representative polling data, published findings and additional qualitative context; appears to have strengthened the evidence base on scale, normalisation and parental knowledge gaps.	Higher	Closely linked with Narratives, Support Mapping and parent engagement work.	Strong as a reusable evidence asset, though its active contribution depends on continued citation and application.
<b>Parent Support Mapping</b>	Map available support for parents, identify gaps and generate system-building recommendations.	Partial progression; roundtable delivered and analysis advanced.	Produced consultations, mapping analysis, a roundtable and recommendations; appears to have clarified where support gaps sit, more than demonstrating implemented service change.	Moderate	Directly linked to Parent Poll findings and wider parent-facing work.	Potentially useful as a roadmap, but continuation appears dependent on follow-through by funders, policymakers or service providers.
<b>Parent Engagement Creative Response</b>	Translate evidence into a tested creative concept for wider parent engagement.	Completed (concept phase).	Produced tested campaign concepts and a costed delivery plan; appears to have identified a more workable parent-facing framing, rather than delivering a scaled campaign.	Higher	Acts as a delivery-facing extension of Narratives and Parent Poll work.	Conditional, because the concept appears ready for scale-up but active continuation depends on further funding and delivery decisions.
<b>CFH Ratings</b>	Test and develop a tool to surface financial risks in online games using large-scale review analysis.	Prototype developed; now moving into early rollout and further development	Produced legal and feasibility work, UX design, a taxonomy and a working prototype; appears to have demonstrated technical feasibility and opened a plausible route for live risk signalling in online games. Its contribution is best understood	Higher	Connected to Parent Consultation insight and wider tech-focused strands.	Strong, because Parent Zone has committed to continuing to develop and promote the prototype and provide ongoing stewardship. See <a href="https://parentzone.org.u">https://parentzone.org.u</a>

		as the Gaming Risk Index.	at this stage as strategic and developmental, with early stakeholder interest suggesting potential relevance for parents, regulators and policy audiences, though downstream regulatory or consumer impact is not yet evidenced.			<a href="#">k/ChildFinancialHarms</a> (now referred to as Gaming Risk Index)
<b>Youth Support</b>	Build specialist CFH training for youth-facing practitioners and volunteers.	Embedded and rolling out.	Produced co-designed training and implementation through The Mix/MHI; appears to have strengthened frontline capacity to recognise and respond to CFH, with delivery reaching a cohort of youth-facing practitioners through established training channels.	Higher	Builds on youth insight and broader programme learning.	Strong, because the training appears embedded in an existing onboarding and support system.
<b>CFH Parliament Event (2025)</b>	Launch the Education Programme and build political and stakeholder visibility for CFH.	Completed.	Produced a parliamentary event and follow-up briefing materials; appears to have strengthened visibility, validated the work publicly and supported the Education Programme launch.	Higher	Highly connected showcase for research, education and stakeholder engagement strands.	More fragile than embedded delivery projects; value lies mainly in momentum, relationships and future advocacy follow-through.
<b>CFH AI Support Review</b>	Assess how generative AI tools respond to CFH scenarios and create guidance for parents.	Testing underway / late-stage development.	Produced prompt testing, comparative analysis and draft guidance; appears to have addressed an emerging risk area and generated practical mitigation material, with materials and guides now	Moderate	Aligned with Ratings.	Potentially durable as a hosted guidance asset, but active relevance depends on updating and stewardship in a fast-changing AI context.

			published online (see <a href="#">here</a> and <a href="#">here</a> ),			
<b>CFH Converter</b>	Create a proof-of-concept tool to show the real sterling value of in-game spending.	Constrained / delayed.	Produced a proof of concept and summary work; appears to have clarified the problem of obscured costs and provided a tangible advocacy device more than a mature deployable product.	Moderate	Part of the CFH Lab and conceptually linked to education and transparency work.	Fragile; future value depends on further technical development and whether the concept is taken forward in regulation or product design discussions.
<b>CFH Game</b>	Develop an age-appropriate KS1 educational game introducing CFH concepts.	Prototype developed and positively tested.	Produced a playable prototype and concept for wider rollout; appears to have extended the prevention agenda into younger age groups, though evidence remains at prototype stage.	Higher	Complements the main Education Programme by covering an earlier age range.	Promising but still conditional on piloting, uptake and decisions about wider integration into delivery.

## Annex 4

### Evaluation framework matrix

Review Focus Areas	#	Evaluation Questions	#	Sub-Questions	Data Source Triangulation			
					Nominet Agile Project Reports	Quarterly Overall Progress Reports	Consortium Member Learning Calls	3rd Party Publications, Research and Media
<b>Area 1: Working as a consortium</b>	1	What has been learned about the consortium model in terms of membership, structure, processes and coordination, and how might this inform future Nominet programmes?	1.1	What has been learned in terms of membership/ structure/ process of running and maintaining a consortium that could inform other Nominet programmes?	X	X	X	
			1.2	What form has collaboration taken across the consortium?	X	X	X	
			1.3	What are the most effective forms of collaboration within the consortium (and why)?			X	
	2	What forms of collaboration have taken place across the consortium, how effective have they been, and what learning has emerged from cross-sector working?	2.1	Have consortium partners learnt from working with other partners from different sectors?		X	X	
			2.2	Have any further collaborations occurred/strengthening relationships within the consortium? (e.g. joint funding bids)		X	X	

		2.3	Have stakeholders learnt anything new about each other's work/ terminology/ way of working?	X		X		
		2.4	Has the consortium funding model aided innovation and has any additional value been added into the project? (e.g. in kind contributions, additional joint-funding)			X		
	3	What added value has the consortium model generated through funding, relationships and wider connectivity, and what gaps or future coordination needs remain?	3.1	Is there anyone missing / which gaps remained in the CFH Consortium membership?			X	
			3.2	Are new organisations emerging that could take a coordinating role to drive the CFH consortium in future?			X	
			3.3	Has the CFH programme interacted with other Nominet-funded programmes/projects? If so, to what effect?			X	
	<b>Area 2: Taking an Agile/Iterative Approach</b>	4	To what extent is cumulative knowledge developing across the projects, including learning loops, transfer and reuse or iteration?	4.1	Is there evidence of learning loops across projects?	X	X	X
4.2				Where did/didn't learning transfer across projects?	X	X	X	
4.3				Are there any examples of reuse/ iteration across projects?	X	X	X	
5		How sustainable is the consortium approach and the individual projects, and what is	5.1	What must exist to sustain the CFH consortium approach (coordination/backbone, resources, ownership)?			X	

		required to sustain what has been developed?	5.2	How sustainable are the individual projects?	X		X	
			5.3	What can continue without funding vs what can't?			X	
	6	To what extent have projects continued to work towards their intended end goals, how and why have goals changed over time, and what does this imply for the Theory of Change?	6.1	Did project goals drift or adapt appropriately?	X	X	X	
			6.2	What drove changes (learning vs external context) in project goals?	X	X	X	
			6.3	How should the Theory of Change and its' underpinning assumptions evolve to reflect learning and future goals?	X	X	X	
	<b>Area 3: Overarching Outcomes</b>	7	Is there evidence of increased wider-sector interest in CFH, including stakeholder engagement, research and evidence generation, media attention, and political attention?	7.1	Are consortium partners seeing any changes in interest (stakeholder demand/ engagement) on the issue of CFH?	X	X	X
7.2				What research/evidence has been produced related to CFH?	X	X	X	X
7.3				Has there been an increase in media coverage of CFH?			X	X

		7.4	Are politicians mentioning CFH more? In parliament, at events etc	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	
	8	How well is CFH understood and defined by key stakeholders, how has the definition evolved, and where does the framing of CFH land or not land?	8.1	How well is the definition of CFH known and the pathways to CFH understood by key stakeholders?	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
			8.2	Has the definition of CFH shifted and why?			<b>X</b>	
			8.3	Where does the framing of CFH land/ not land (and messaging implications)?	<b>X</b>	<b>X</b>	<b>X</b>	

## Annex 5

### Data sources register

Data Sources	Description	Source Type	Time Period Covered	When/ Frequency collected
<b>CFH Agile Project Reports</b>	A pdf report on the individual agile projects carried out by the CFH consortium programme across the period of the overall programme timespan (3 years). It consists of PINK SECTIONS FILLED AT THE START OF THE PROJECT. THEN GREEN SECTIONS FILLED AT THE END OF THE PROJECT. Each individual agile project relates back to the CFH Theory of CHange.	Pdf report bundle	Section completed at start of project and then another section completed at the end of project.	According to timeframe for each individual project
<b>Quarterly Overall Progress Reports</b>	This document provides a narrative summary of activity and outputs for the Child Financial Harms programme (CFH) funded through the Nominet Countering Online Harms Innovation Fund (COHIF). Scope - The report is intended for Nominet's use only and not for wider sharing. It is intended to be read alongside the programme impact reporting and project specific reports where appropriate.	Pdf report bundle	Start to end of project (Years 1-3)	Produced every quarter
<b>Consortium Member Learning Calls (Year 3)</b>	Transcripts of Learning calls carried out with consortium members at end of Year 3	Pdf interview transcript bundle	Start to end of project (Years 1-3)	End of Year 3 (Mar 2026)
<b>3rd Party Publications, Research, Guidance and Media</b>	3rd Party Publications, Research, Guidance and other Media Produced on or about CFH that may have been influenced or inspired by the work of the consortium.	Pdf docs/ website links to blogs/ articles	Start to end of project (Years 1-3)	Ongoing across the period of the programme - as and when released/ produced
<b>Background and Framing Documentation</b>	Background Consortium Planning and Funder documents; Theory of Change; Year 1 evaluation report	Pdf docs	Start of Project; updated across the term	Ongoing across the period of the programme - as and when updated- version control

## Annex 6

### Study Interview Participants

Participant Name	Title	Organisation Name	Organisation website link
Cliff Manning	Research and Development Director	Paret Zone	<a href="https://parentzone.org.uk/article/digital-family-life">https://parentzone.org.uk/article/digital-family-life</a>
Vicki Shotbolt	CEO	Paret Zone	<a href="https://parentzone.org.uk/article/digital-family-life">https://parentzone.org.uk/article/digital-family-life</a>
Rahul Mudholka	Manager of unauthorised fraud	UK Finance	<a href="https://www.ukfinance.org.uk/about-us">https://www.ukfinance.org.uk/about-us</a>
Dr David Zende	Senior Lecturer, Psychology	University of York	<a href="https://pure.york.ac.uk/portal/en/persons/david-zende/">https://pure.york.ac.uk/portal/en/persons/david-zende/</a>
Simon Miller	Director of Policy, Strategy and Communications	CIFAS	<a href="https://www.cifas.org.uk/about-cifas/what-is-cifas">https://www.cifas.org.uk/about-cifas/what-is-cifas</a>
Jonathan Baggaley	CEO	PSHE Association	<a href="https://pshe-association.org.uk/our-vision/why-pshe-education-matters">https://pshe-association.org.uk/our-vision/why-pshe-education-matters</a>
Matt Haworth	Co-founder & Director	Reason Digital	<a href="https://reasondigital.com/">https://reasondigital.com/</a>
Charlotte Churchill	Policy Manager	Money and Pensions Service (MAPS)	<a href="https://maps.org.uk/en/about-us/who-we-are">https://maps.org.uk/en/about-us/who-we-are</a>
Sarah Brenig-Croft	CYP Policy Manager	Money and Pensions Service (MAPS)	<a href="https://maps.org.uk/en/about-us/who-we-are">https://maps.org.uk/en/about-us/who-we-are</a>