

HOUSE OF LORDS

Select Committee on Communications

2nd Report of Session 2016–17

Growing up with the internet

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Select Committee on Communications

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See Appendix 1.

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Committee staff

The staff who worked on this inquiry were Theodore Pembroke (Clerk), Helena Peacock (Policy Analyst) and Rita Logan (Committee Assistant).

Contact details

All correspondence should be addressed to the Select Committee on Communications, Committee Office, House of Lords, London SW1A 0PW. Telephone 020 7219 6076. Email

holcommunications@parliament.uk

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Evidence is published online at www.parliament.uk/children-and-the-internet and available for inspection at the Parliamentary Archives (020 7129 3074).

Q in footnotes refers to a question in oral evidence.

SUMMARY

Children inhabit a world in which every aspect of their lives is mediated through technology: from health to education, from socialising to entertainment. Yet the recognition that children have different needs to those of adults has not yet been fully accepted in the online world.

There is well documented public concern about risks to children from the internet such as easy access to inappropriate content, loss of privacy, commercial exploitation and cyberbullying. Our inquiry sought to understand what issues and opportunities children face as they grow up surrounded by, and interacting with, internet technologies.

At the heart of our recommendations we call for sustained leadership from the Government at the highest level, an ambitious programme of digital literacy, minimum standards for those providing internet services and content ('the internet value chain'), and a commitment to child-centred design. We also believe that children must be treated online with the same rights, respect and care that has been established through regulation in offline settings such as television and gambling.

Although there is widespread agreement that the internet should do more to promote children's best interests, we found that Government responsibility for this was fragmented both between and within departments resulting in a lack of coordinated policy and joined-up action. We found a similar lack of coordination in the voluntary sector. In addition, self-regulation by industry is failing. And making progress is made still more difficult by public ignorance of how the internet works.

We noted that the current regime of self-regulation very often puts commercial considerations first. The Government has a duty to hold 'the best interests of the child' as a primary consideration in any action which concerns a child under the UN Convention on the Rights of the Child. We note that the upcoming EU General Data Protection Regulation (GDPR) will give children more rights, including the right to erasure (the so-called 'right to be forgotten'). We ask for a commitment from the Government that the rights provided to children by the GDPR will be enshrined as a minimum standard in UK law.

We call on industry to implement minimum standards of child-friendly design, filtering, privacy, data collection, and report and response mechanisms for complaints. The standards should encompass consideration of children's rights and should be built early into the process of design so that the needs of children are considered preventatively rather than reactively.

We welcome the commitment by the four major Internet Service Providers (ISPs) to provide child-friendly filters, and believe it is necessary for all ISPs do the same. We also recognise the work in this area by the major mobile operators. We recommend that there should be minimum standards for online filters, including a system to manage the over-blocking of websites, and crucially we recommend that filters be required to be 'on' by default.

Digital literacy, that is, the skills and knowledge to critically understand the internet, is vital for children to navigate the online world. It is also an essential requirement of the future workforce. It is no longer sufficient to teach digital skills in specialist computer science classes to only some pupils. We recommend

that digital literacy sit alongside reading, writing and mathematics as the fourth pillar of a child's education; and that no child should leave school without a well-rounded understanding of the digital world. Schools should teach online responsibilities, social norms and risks as part of mandatory, Ofsted-inspected Personal, Social, Health and Economic (PSHE) education, designed to look broadly at the issues that children face online.

We heard of a worrying rise in unhappy and anxious children emerging alongside the upward trend of childhood internet use. We call for more robust research in respect of the possible causal relationship in this regard, while also supporting immediate action to prevent children being adversely affected in the meantime.

Ensuring children's online opportunities and wellbeing are optimised is a shared responsibility. Each group of stakeholders, the Government, the internet value chain, voluntary sector and civil society, schools, parents and children, are interdependent, and each has a vital role to play. Efforts to meet these responsibilities need to be continually assessed and sustained to respond to the fast-changing developments of the digital world. At each point of the internet value chain we support an approach that requires minimum standards that uphold the best interests of the child.

We support the recommendation of the Children's Commissioner to extend her data gathering powers to include social media and internet services. We further recommend that there is an independent mechanism to arbitrate complaints from children who wish content about themselves to be taken down.

We welcome the recent announcement by the Government that round-table meetings with industry representatives are to be held and an Internet Safety Strategy is to be introduced. But there have been meetings and reviews in the past without sufficient progress on digital literacy, prevention of risks and child-centred design. We therefore make two central recommendations. First, we recommend that a permanent role of Children's Digital Champion be established within the Cabinet Office with the power to seek coordinated and sustained action from Ministers across all departments, and to present robust advocacy on behalf of children to industry. We note the current role of the United Kingdom Council for Children's Internet Safety (UKCCIS) and recommend that this is extended and overseen by the new Children's Digital Champion.

Secondly, we recommend that in convening an industry summit, the Prime Minister should seek to establish minimum standards and a code of conduct based on the desires of children, teachers and parents as well as the commercial needs of the companies. The Government should apply existing legal measures rigorously and be prepared to propose new legislation in the face of non-compliance with the new code of conduct.

It is the Committee's view that this issue is of such critical importance for our children that the Government, civil society and all those in the internet value chain must work together to improve the opportunities and support where the end user is a child. Ultimately it is for the Government to ensure that this happens.

SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Key recommendations are in bold.

Responsibility

1. Children of all age groups inhabit a world that seamlessly flows between on and offline. In order to thrive in both they need the protections and privileges that they enjoy offline. Digital technologies are the present and the future of these 21st century children. They will define their opportunities as workers and as citizens. These opportunities need to be upheld and shaped by many different stakeholders. (Paragraph 192)
2. Any future policy should be based on principles which firmly place children's rights, wellbeing and needs as the preeminent considerations at all points of the internet value chain where the end user is a child. This shared responsibility requires all stakeholders to play their part, and all parties to sustain their commitment to children's wellbeing in what is a rapidly changing landscape that will include on the near horizon the Internet of Things and Artificial Intelligence. (Paragraph 353)
3. The Government has a key role in providing an appropriate framework for stakeholders to act in a concerted, joined-up way. It has a particular obligation to comply with the UN Convention on the Rights of the Child to ensure that children's wellbeing is protected, to promote children's right to be heard in matters that affect them, and to act in the best interests of the child in all cases. (Paragraph 360)

The Government

4. ***We recommend that the Government should establish the post of Children's Digital Champion at the centre of the Government within the Cabinet Office, with a remit to advocate on behalf of children to industry, regulators and at ministerial level across all Government departments.*** (Paragraph 364)
5. *The remit of the Children's Digital Champion should include:*
 - *establishing and overseeing the implementation of minimum standards of design and practice across the entire internet value chain,*
 - *working with the Department for Education to set the standard of digital literacy and PSHE in all UK schools,*
 - *commissioning research, and*
 - *ensuring existing rights and legislation are implemented in online settings.* (Paragraph 365)
6. ***We welcome the Government's promotion of an Internet Safety Strategy and the intention to hold round table meetings with industry leaders. We see this as the opportunity for the Prime Minister to take forward the recommendations of this report culminating in a summit which would establish minimum standards for child-friendly design, filtering, privacy, data collection, terms and conditions of use, and report and response mechanisms for all businesses in the internet value chain, public bodies and the voluntary sector.*** (Paragraph 366)

7. ***The standards should be set out in a code of conduct, which should also seek to promote digital literacy. If industry fails to implement the recommendations, then the Government should take action. The UK must be an exemplar in raising standards.*** (Paragraph 367)
8. *We further recommend that the Government should commission a version of the code of conduct which is written by children for children and that it builds on ‘in depth’ contributions of young people from existing research.* (Paragraph 368)
9. *We note the NSPCC’s suggestion for creating a user generated age rating system. We recommend that the Children’s Digital Champion work with others to investigate the potential of such a scheme.* (Paragraph 397)
10. ***The Committee feels that the role of the UK Council for Children’s Internet Safety in research and convening stakeholders should continue but in order to enhance its effectiveness it should report to the Children’s Digital Champion who has the independence from industry and access at a ministerial level. Its remit and membership should be extended to support a broader delivery that includes children’s rights, digital literacy, industry codes, as well as safety.*** (Paragraph 370)
11. *The Government should also involve further education providers as well as universities and encourage them to incorporate the standards and the code of practice in relevant courses.* (Paragraph 371)
12. *Parents and carers need clearly communicated information about the digital world. We recommend that the Government and industry should invest in regular public campaigns to promote information and tools that help parents and carers. In particular, a campaign with a short memorable message, similar to the Green Cross Code, should be developed. It should focus on creating confidence in online parenting.* (Paragraph 216)
13. *We recommend that specific training modules be developed and made compulsory as part of qualifying in frontline public service roles, including but not limited to, police, social workers, general practitioners, accident and emergency practitioners, mental healthcare workers and teachers.* (Paragraph 217)
14. ***We call on the Government to give an undertaking that, irrespective of its membership of the EU, the UK should maintain legislation which incorporates the standards set by the General Data Protection Regulation in respect of children, including the right to be forgotten, as a minimum.*** (Paragraph 245)
15. *We support the age verification provision of the Digital Economy Bill. We hope that the Government will provide greater clarity about the powers of the regulator, and will include social media companies within the definition of ‘ancillary service providers’.* (Paragraph 265)

Minimum standards for industry

16. ***The Committee supports children’s right to have upsetting content that concerns themselves removed. All businesses operating online, particularly companies which provide social media and content-sharing platforms services such as Google and Facebook, should respond quickly to requests by children to take down content. Where***

innappropriate content that concerns a child is reported by third parties, similar processes should be followed. (Paragraph 240)

17. ***Minimum standards should be adopted that specify maximum timeframes for report and response. Companies should publish both targets and data concerning complaint resolution.*** (Paragraph 241)
18. *All platforms and businesses operating online should proactively remove content which does not comply with their own published standards.* (Paragraph 242)
19. **We recommend that, as suggested by the Children’s Commissioner, her power to request information from public bodies should be expanded to include aggregated data from social media companies and online platforms.** (Paragraph 243)
20. *We further recommend that there should be a mechanism for independently handling requests from children for social media companies to take down content. This might take the form of an Ombudsman, as suggested by the Children’s Commissioner, or a commitment from industry to build and fund an arbitration service for young people.* (Paragraph 244)
21. *We recommend that all ISPs and mobile network operators should be required not only to offer child-friendly content control filters, but also for those filters to be ‘on’ by default for all customers. Adult customers should be able to switch off such filters.* (Paragraph 258)
22. *Those responsible for providing filtering and blocking services need to be transparent about which sites they block and why, and be open to complaints from websites to review their decisions within an agreed timeframe. Filter systems should be designed to an agreed minimum standard.* (Paragraph 259)
23. ***We welcome the development of internet services which are specifically designed for very young children but regret that there are no such services for children as they grow older. We have found that there is resistance to providing services which incorporate the support and respect for rights that would enable a better internet experience for all children as they explore the wider internet.*** (Paragraph 298)
24. *We recommend that the Government should establish minimum standards of design in the best interests of the child for internet products. For the avoidance of doubt this is for all products that might reasonably be expected to attract a large proportion of children, not only those designed with children in mind.* (Paragraph 299)
25. ***The minimum standards should require that the strictest privacy settings should be ‘on’ by default, geolocation should be switched off until activated, and privacy and geolocation settings must not change during either manual or automatic system upgrades.*** (Paragraph 300)
26. *Minimum standards should incorporate the child’s best interests as a primary consideration, and in doing so require companies to forgo some of their current design norms to meet the needs of children.* (Paragraph 301)
27. *All platforms and businesses operating online must explain their data collection practices, and other terms and conditions, in a form and language that children are likely to understand. Their explanations should not try to obfuscate the nature of the agreement.* (Paragraph 302)

28. *All platforms and businesses operating online must not seek to commercially benefit or exploit value from the sharing or transfer of data gained from a child's activities online, including data transferred between services that are owned by the same parent company. They should uphold a principle of minimum data gathering necessary for the delivery of a service when the end user is a child. (Paragraph 303)*
29. *All platforms and businesses operating online which large numbers of children use should incorporate a 'time out' function into their design even if it is not in their best commercial interests. It is the view of the Committee that the wellbeing of the child is of paramount importance, and in our view there is sufficient evidence that time-outs or breaks contribute positively to the mental health and wellbeing of children. (Paragraph 304)*

Digital Literacy

30. ***We agree with the Digital Skills Committee that no child should leave school without an adequate standard of digital literacy. It is the view of this Committee that digital literacy should be the fourth pillar of a child's education alongside reading, writing and mathematics, and be resourced and taught accordingly. (Paragraph 317)***
31. ***We recommend that the Government should make PSHE a statutory subject, inspected by Ofsted. The Committee further recommends that PSHE be mandatory in all schools whatever their status. The PSHE curriculum must be designed to look broadly at the issues young people are concerned about online, including compulsive use, data gathering, body image—rather than the current e-safety agenda of risk. Children need support in developing their critical thinking and understanding the veracity of online information. This should form part of the curriculum. We also note Ofcom's duty under the Communications Act 2003 to promote media literacy. (Paragraph 318)***
32. *It is the Government's responsibility to reassess the resources needed to deliver computer science and PSHE in all UK schools and to ensure that teachers are adequately trained and resourced. But we note with interest that graduates currently entering teacher training are the first group of teachers who might be considered 'digital natives'. We recommend that the Government harness and further upgrade the skills of this new generation in the course of teacher training so that UK schools are at the forefront of the digital revolution. (Paragraph 319)*
33. *We commend the work of the voluntary sector and industry in delivering information and resources about online safety and digital literacy for parents and children, but note that it is currently fragmented and insufficient to meet the needs of all children. Once a truly rounded computer science education and fully resourced Personal, Social Health and Economic education is established in schools, we believe that there will be a clearer role for the voluntary sector and industry. (Paragraph 320)*
34. *The Government should ensure that schools are sufficiently resourced and directed to meet their obligations of child protection, including the ability to train their teachers and to develop digital policies which are right for them and to discern what sort of filtering and monitoring systems are appropriate, together with pastoral care, education and supporting parents. (Paragraph 331)*
35. *We caution that internet safety systems should not undermine children's rights to privacy, to learn about the world and to express themselves. The Government*

should require schools to obtain the informed consent of parents and students, and they should have the opportunity to opt out. (Paragraph 332)

Research

36. *Children are often first to encounter problems online because they are digitally active, but often not consulted about the nature of those problems. We recommend that the Government should commission research based on in depth consultation with children. We note that because of the rapid nature of technological change public policy may on occasion have to anticipate the conclusion of long-term research. Such research should include:*

- *the relationship between age and vulnerability, taking account of the differences of ethnic and socioeconomic backgrounds;*
- *the impact of screen time on social and cognitive development;*
- *the effect of watching online pornography upon children's attitudes and sexual development. (Paragraph 338)*

Toward a better internet for children

37. *We find that the current regime of self-regulation is underperforming and believe it will take a step change from the highest level of the Government to represent the needs of children online. (Paragraph 352)*

38. *It is the Committee's view that this issue is of such critical importance for our children that the Government, civil society and all those in the internet value chain must work together to improve the opportunities and support where the end user is a child. Ultimately it is for the Government to ensure that this happens. We look forward to its response to this report. (Paragraph 372)*

Growing up with the internet

CHAPTER 1: INTRODUCTION

Our inquiry

1. We live in a digital age. The internet is not just something children access when they want certain bits of information, it is an essential and intrinsic part of the world they inhabit—it is not an exaggeration to say that to take away a young person’s phone feels to them like removing a limb. We rejoice at the new opportunities for knowledge, creativity and community that this brings, but we yearn for the wisdom that will enable the internet to be a safe and fairly regulated place where all users, and especially children and young people can flourish.
2. The internet has a ubiquitous influence in our lives. United Nations (UN) research has estimated that 3.5 billion people (47 per cent of the world population)¹ use the internet globally. One third are under 18. As a society we need to embrace innovations that are exciting and can transform children’s opportunities. At the same time, we have a duty to consider children’s best interests in this rapidly changing world.
3. The question of children and the internet cannot be viewed in isolation from the changing nature of society and the future workplace where automation and ‘digital by default’ are increasingly the new norm. It will be essential for every child in the UK to participate in society, and to have the necessary skills to be fully 21st century citizens.
4. Our inquiry did not set out to identify and weigh up the relative advantages and disadvantages of the internet. Rather, we considered what skills they might need and what impact the internet has on children’s development, wellbeing and mental health. We also considered what rights children enjoy online, and what impediments there are to these. To this end, we consulted with a broad group of stakeholders and sought the views of young people.²
5. We are grateful to all those who contributed to this report. We are also especially grateful to Professor Marina Jirotko of the University of Oxford and Professor Sonia Livingstone of the London School of Economics and Political Science for their expert advice throughout the course of our inquiry.

Background

6. Those born from around 2000 onwards are often referred to as ‘digital natives’. They have grown up in a world where user-friendly digital technology surrounds them, which they can learn to use intuitively.³
7. Vicki Shotbolt of the charity Parent Zone told us that the use of devices by young children was so commonplace that she had seen an increase in queries from parents “about tech tantrums: about much younger children for whom

1 ‘Nearly 47 per cent of global population now online - UN report’, *UN News Centre* (15 September 2016): <http://www.un.org/apps/news/story.asp?NewsID=54931#.WLLbn8pXUpE> [accessed 3 March 2017]

2 See Appendix 7.

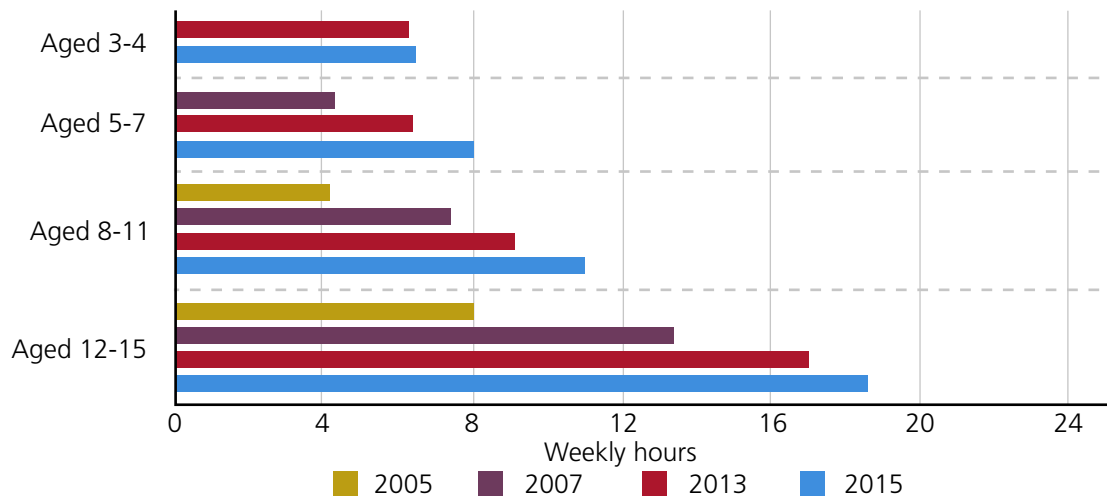
3 [Q 113](#) (Dr Akil Awan)

the device has become the thing that causes the big arguments. It used to be vegetables but not anymore; it is taking the device away.”⁴

8. Baroness Shields, the Parliamentary Under Secretary of State for Internet Safety and Security, told the Committee that:

“Society is evolving in a way in which it has never evolved before. It is almost the largest social experiment in history. We have never had this much change in such a short period of time”.⁵

Figure 1: Time online



Ofcom, Children and parents media use and attitudes report (16 November 2016)

Base: Parents of children aged 3-7 who use the internet at home or elsewhere and children aged 8-15 who use the internet at home or elsewhere (VARIABLE BASE) - Significance testing shows any change between 2015 and 2016

9. The Children’s Commissioner told the Committee that “For most children there is no longer a clear distinction between their online and offline lives.”⁶
10. Barnardo’s, a children’s charity, agreed that the “sheer scope of the internet and its ubiquity means ... that today’s children increasingly may not even distinguish ‘the internet’ as one holistic defined arena that can contrast to physical life.” It believed that many young people are “conceptualising individual platforms such as Facebook, Whatsapp, or Snapchat as different spaces in their life in the way previous generations might have identified ‘school’, ‘scouts’ or ‘dance class’.”⁷
11. Evidence provided to the Committee from a child’s perspective demonstrated the wide range of activities that children do online:

“We can use the internet not only for educational purposes but for finding out new words. Occasionally playing games. You can get answers almost instantly without having to give yourself numerous papercuts flipping

4 [Q 23](#) (Vicki Shotbolt)

5 [Q 133](#) (Baroness Shields OBE)

6 Written evidence from the Children’s Commissioner for England ([CHI0028](#))

7 Written evidence from Barnardo’s ([CHI0013](#))

through heavy books. You can communicate with other people and send pictures of something funny your pet did.”⁸

12. In this environment children are adopting recently innovated technology before policy makers, schools or parents consider or understand the implications of such technology.
13. Vicki Shotbolt criticised the use of the term “digital natives” because “it makes parents feel immediately disempowered.”⁹ This term could also be contributing to a sense of inevitability in which policy makers feel that nothing can or should be done to address the situation.
14. Over recent years, concerns about children’s use of the internet have centred on areas such as cyberbullying and access to unsuitable content, but there are other emerging areas of concern.¹⁰ Parent Zone told us that parents regularly worry about “the commercialisation of childhood, the wholesale capturing of children’s data and excessive screen time”.¹¹ Our witnesses also highlighted concern about the lack of regulation, the need to protect children’s rights and the importance of encouraging online parenting.
15. Some witnesses believed that, fundamentally, the internet does not take sufficient account of children and the fact that their needs are different to those of adults.¹² Still less does the internet recognise differences among children according to their age and maturity, life circumstances and resources.
16. Barnardo’s told us that a failure to consult childhood experts when developing technology “can lead to a narrow perception of children as ‘rational consumers’ rather than emerging human beings whose understanding may lead them to misuse internet technology.”¹³
17. In other areas of life there are laws and regulations in place to protect children. Witnesses suggested that this is not the case with the internet. John Carr, Chair of the Children’s Charities Coalition on Internet Safety, told the Committee:

“Young people are easily the biggest single distinguishable or definable constituent group of internet users. You would not know that if you looked at the internet governance institutions. They are pretty much massively overlooked and disregarded, and it is a fault of governance institutions, fundamentally.”¹⁴
18. The adoption of the UN Convention on the Rights of the Child in 1989 marked an important milestone in the development of an international framework of rights for children and young people. It is the most widely adopted multilateral treaty in history¹⁵ (see Box 1).

8 Written evidence from Poppy Morgan ([CHI0035](#))

9 [Q 25](#) (Vicki Shotbolt)

10 Content may take the form of text, images, music or sound, games, video, or animation.

11 Written evidence from Parent Zone ([CHI0011](#))

12 For example, written evidence from Children’s Media Foundation ([CHI0027](#)).

13 Written evidence from Barnardo’s ([CHI0013](#))

14 [Q 5](#) (John Carr). See Appendix 3 for a table of policy responses which vary depending on whether the child is online or offline.

15 UN News Centre, *UN lauds Somalia as country ratifies landmark children’s rights treaty* (4 May 2015) <http://www.un.org/apps/news/story.asp?NewsID=50759#.WMfxcSIXXct> [date accessed 1 March 2017]

Box 1: The United Nations Convention on the Rights of the Child (UNCRC)

The United Nations (UN) Convention on the Rights of the Child is based on the principle that every child has rights, whatever their ethnicity, gender, religion, language, abilities or any other status. The Convention has 54 articles that cover all aspects of a child's life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights. The UK signed it in 1990, and it came into UK law in 1992.

Four articles in the Convention, known as the "General Principles", have a special role in helping to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:

- (1) Non-discrimination (article 2)
- (2) Best interest of the child (article 3)
- (3) Right to life survival and development (article 6)
- (4) Right to be heard (article 12)

A further list of Articles that are relevant to digital media are listed in Appendix 5.

Source: UN Convention on the Rights of the Child

19. However, some have criticised the lack of the implementation of the UNCRC in respect of the internet. For example, 5Rights, an organisation which campaigns to promote children's rights online, said:

"Age makes children and young people vulnerable ... [yet] we do not observe children's rights in the digital world. Rights that protect them from commercial exploitation, offer the highest standards in wellbeing and education. Rights that protect them from violence and harm, and give them privacy."¹⁶

20. Some of our witnesses also pointed out that improvements in the design of technology will be the key to improving the internet for children. As Baroness Shields told us: "Technology is what got us here. I believe that it is also what can help to solve these problems, but it takes co-operation and Governments raising the issue."¹⁷

Stages of childhood

21. The Children's Online Privacy Protection Act (COPPA) is a US federal law which was designed primarily with the data protection of the under-13s in mind. John Carr explained that, as most of the social media platforms are American companies, "they are required to make a distinction between persons below the age of 13 and persons above the age of 13, and then up to 18".¹⁸

¹⁶ 5Rights, <http://5rightsframework.com/> [accessed 24 January 2017]

¹⁷ [Q 133](#) (Baroness Shields OBE)

¹⁸ [Q 5](#) (John Carr OBE)

22. But, as the BBC observed, using the term ‘children’ suggests “a single group of users with similar needs. However ... children’s developmental, emotional and social needs change dramatically as they get older.”¹⁹
23. Ofcom research shows clear differences in the devices that age groups use:
- “When asked which device they would miss the most if it was taken away, 12-15s are most likely to say their phone, while 8-11s are most likely to nominate the TV set (30%), although the number of 8-11s opting for their mobile has nearly doubled since 2015 (16% vs. 9%).”²⁰
24. There are also differences in the type of content that children consume. Ofcom research shows that in the case of YouTube:
- “Younger children (3-7) are most likely to watch TV programmes, films, cartoons, mini-movies, animations or songs, with parents saying this is their child’s favourite type of YouTube content. As children get older this makes way for music videos, funny videos/ pranks and content posted by vloggers, with the qualitative research finding that vloggers in particular are an important source of teen orientated content.”²¹
25. This development through the age groups is also reflected in the way that parents manage their children’s internet use.²²
26. Google said that it recognised that teenagers have a different status, saying: “We ... make sure that we respect people’s data related to different age groups. We have different priorities for people aged 13 to 18 who use our services and a different approach to advertisement in the way their data is held. We make sure that all data, whatever the age of the user, is never sold or passed to third parties; it always stays within Google.”²³ It is not clear, however, to what extent such policies are reflected in practice, not least because the difficulty—or lack of effort taken—in identifying users as children.²⁴
27. Moreover, some witnesses were concerned that there were not sufficiently granular policies in place to protect those above 13. John Carr noted that:
- “In so far as we have laws around these things, people under the age of 13 are regarded as children, and there would be a whole raft of things that you would expect to apply in respect of them. But between the ages of 13 and 18 they are all lumped together in one chunk, and, again, similar policies would be applied to them. I am not sure that is a very good approach, because between the ages of, essentially, 12 and 18 children do a lot of growing up.”²⁵
28. BT argued that more research was needed: “There is a need for ongoing research to understand how children of different age groups, e.g., five-year

19 Written evidence from the BBC ([CHI0053](#))

20 Ofcom, *Children’s and parents media use and attitudes: executive summary* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

21 Ofcom, *Children’s and parents media use and attitudes: executive summary* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

22 Written evidence from Children’s Media Foundation ([CHI0027](#))

23 [Q 118](#) (Katie O’Donovan)

24 Written evidence from BT ([CHI0020](#))

25 [Q 5](#) (John Carr OBE)

olds as opposed to fifteen-year olds, are using the internet in order to develop evidence-based policy.”²⁶

29. Dr Nihara Krause, a clinical psychologist and founder of stem4,²⁷ provided an overview of the different stages of childhood:

“When children are very little, you would be working on issues around attachment and trust. As they get a little older, you would expect issues around emotional regulation, learning about give and take in relationships, learning about boundaries and, through that, how they might place boundaries on their own behaviour. That is up to about the age of five.”²⁸

30. Alice Webb observed the progression as children get older:

“At about five to seven they are moving on into the next level of interaction and are playing slightly more complex games. Children at that stage want to start to learn things, to repeat things. With that we see that the learning side of things gets more complicated as they move up, because they move from learning a skill to mastering a skill.”²⁹

31. Dr Krause described the development from the age of six to 12. She said:

“There is a very rapid change in children’s understanding of themselves and the world. They start to think more about morals: for example, what is good and bad; they start to separate what is real and unreal; and they start to think more about cause and effect, so the consequences of their behaviour start to become more apparent to them. Of course, there will be the beginnings of very strong identity formation, and that will happen through testing out a variety of different types of identity.”³⁰

32. Dr Krause told the Committee that it is in:

“Adolescence when there is the most rapid growth in becoming independent, autonomous, starting to think very clearly about what roles they might like to take, what sort of person they might be and how they connect socially, and their responses to other people and how other people in turn affect them. That enables them to think clearly about how they relate to peers and adults.”³¹

Dr Marc Bush also asked us to recognise “the impulsive nature of later childhood and early adulthood.”³²

Devices and services used by children

33. The devices we use to access the internet have changed dramatically in the last few years, from a single family PC, often in a communal area of the house, to individual portable devices such as smart phones and tablets that children can carry with them at all times. As the BBC told the Committee, “Children use multiple devices [used] to access digital services and can

26 Written evidence from BT (CHI0020)

27 A charity set up to increase awareness and reduce stigma around mental ill health in teenagers.

28 Q 98 (Dr Nihara Krause)

29 Q 74 (Alice Webb)

30 Q 98 (Dr Nihara Krause)

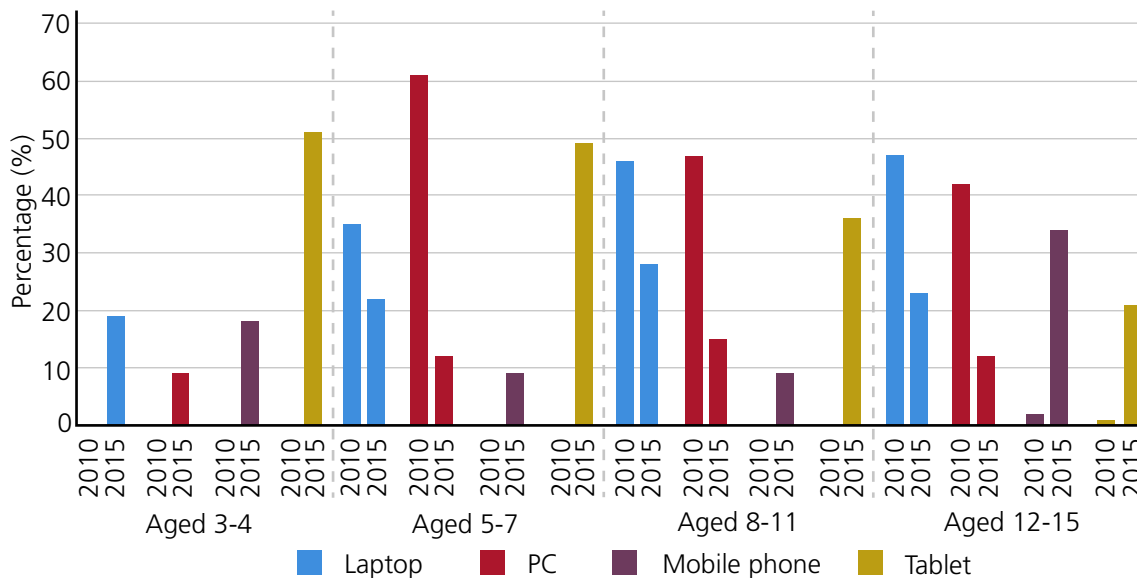
31 Q 98 (Dr Nihara Krause)

32 Q 98 (Dr Marc Bush)

connect from their home network, school, friends' houses, or by using public Wi-Fi and mobile networks.”³³

34. Publicly accessible Wi-Fi has increased to cover places such as cafes, libraries and other public places. The European Commission has now proposed “to equip every European village and every city with free wireless internet access around the main centres of public life by 2020.”³⁴

Figure 2: Devices used by children



Source: Ofcom, *Children and parents media use and attitudes report* (16 November 2016)

Base: Parents whose child ever goes online aged 3-4 (272) or 5-15 (1172 aged 5-15, 264 aged 5-7, 445 aged 8-11, 463 aged 12-15). Significance testing shows any change between 2015 and 2016.

35. Ofcom said that:

“Since 2015 there have been increases in the numbers of 5-15s who say that a tablet or a mobile phone is the device they use most often to go online (39% vs. 33% for tablets and 28% vs. 19% for mobile phones). As a result, the mobile phone is now the second most popular device to go online (after tablets), overtaking laptops which were the second most popular device in 2015.”

36. Furthermore, children at increasingly young ages are accessing portable devices, which can make it harder for parents or carers to monitor activity.

37. With respect to online services, Parent Zone claimed that children used “all of the internet”:

“This includes familiar names like Facebook, Snapchat and Instagram, but it also includes places that fewer adults understand, including services like Putlocker, a site that facilitates free streaming of movies and TV programmes, and VPNs (Virtual Private Networks) that facilitate

33 Written evidence from the BBC ([CHI0053](#))

34 BBC News, *European Commission plans free Wi-Fi in public spaces* (14 September 2016) <http://www.bbc.co.uk/news/technology-37362853> [accessed 24 January 2017]

anonymous surfing and, more crucially for young people, the ability to bypass filters.”³⁵

38. Group chat services that are used to connect with family and friends, including Snapchat, WhatsApp, Facebook Messenger and Instagram, have increased in popularity. Facebook is the most popular main social media profile with 8-11s and 12-15s. This is unchanged since 2015 but has fallen considerably since 2013, when 87% of 12-15s considered Facebook their main site.³⁶ Snapchat has seen an increase from the 12-15 age groups to 51%, up from 43% in 2015, while use of Twitter has fallen by 7% to 20%.³⁷ The BBC told the Committee that “Snapchat is for their friends and they don’t have large networks on here, it is fast paced and funny. Instagram is where they curate their online personas and they can spend hours creating the perfect selfie.”³⁸
39. It is increasingly a norm for a child to have a social media presence and the likelihood of having a social media profile increases with age. Ofcom research states that:
- “0% of 3-4s, 3% of 5-7s, 23% of 8-11s and 72% of 12-15s have a profile ... The biggest increase comes between ages 10 and 11, when the number with a profile doubles from 21% to 43%, and there is another sharp increase between 12 and 13, from 50% to 74%.”
40. The increase at age 11 corresponds to the start of secondary school. This has led some to observe a change in some of the ways in which children interact with their peers in comparison with previous generations. Research has “found that ‘likes’ on social media were important ‘social currency’, with children saying they would remove posts if they didn’t quickly receive what they considered to be an acceptable number.”³⁹
41. Playing games online is also now a norm in a child’s life. Internet Matters cited research from the *Childwise Monitor* which shows that gaming apps are the “most used by 7–16 year olds, with Minecraft being popular amongst 7–10s.”⁴⁰
42. Ofcom noted that some games “offered considerable scope for creativity, particularly Minecraft which many of the children played in ‘creative mode’, engaging in extensive design and construction.”⁴¹
43. The launch of Pokémon Go in 2015 has been credited with inspiring many to take to the streets. This ‘Augmented Reality’ (AR) which “effectively

35 Written evidence from Parent Zone (CHI0011)

36 Ofcom, *Children and parents media use and attitudes report* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

37 Ofcom, *Children and parents media use and attitudes report* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

38 Written evidence from the BBC (CHI0053)

39 Ofcom, *Children and parents media use and attitudes report* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

40 Written evidence from Internet Matters (CHI0040)

41 Written evidence from Ofcom (CHI0051), (CHI0060)

merge(s) the real world with the digital world”⁴² primarily for gaming purposes, is seen as the future of gaming.

44. We also noted that there is a difference in the types of games played by boys and girls. Dr Bush told the Committee:

“Boys tend to use massively multiplayer online games—MMOs—or first-person shooter games, which are very much about participating in questing, adventures or military operations. Girls tend to be involved in role-playing games, which are more about fantasy and sci-fi, and are more likely to use games on their mobile phones.”⁴³

45. Children also use the internet as a source of information. 78% of all 8-11s and 88% of all 12-15s who go online said that they used search engines, according to Ofcom research:

“While the BBC website remains the preferred source of ‘true and accurate information about things that are going on in the world’ for 12-15s who go online (35%), this has declined substantially since 2015 (52%). Instead, children are more likely to say they would turn to Google for this (30% vs. 17% in 2015).”⁴⁴

46. The internet not only provides an unprecedented range of information, but also interactive experiences for children to learn.⁴⁵ Ofcom gives the example of a 10-year-old girl learning Arabic via Skype.⁴⁶ Will Gardner of Childnet emphasised the advantage of being able to communicate within social groups. He also suggested that it can be “a great source of support and advice even for young people for a range of different topics with information that they might not want to ask trusted adults about”.⁴⁷
47. The internet allows children to explore intimate aspects of life. A 2013 survey found that, “while the majority of girls and young women aged 11 to 21 still get information about relationships and sex from talking to friends (63%) and from sex education lessons at school, 35% turned to the internet as a source of information and advice. For older girls aged 16 to 21 the internet was even more important, with 49% getting information about sex and relationships online.”⁴⁸
48. Some of our witnesses highlighted the potential for the internet to be an avenue for political engagement for children. In particular, YouthLink Scotland told us: “Social media provides a platform for young people to express their opinions and be heard. It is narrowing the traditional generational gap of whose voices are heard in decision making.”⁴⁹

42 Written evidence from Internet Matters ([CHI0040](#))

43 [Q 101](#) (Dr Marc Bush)

44 Ofcom, *Children’s and parents’ media use and attitudes: executive summary* (3 February 2017):https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 2 March 2017]

45 [Q 2](#) (John Carr OBE)

46 Written evidence from Ofcom ([CHI0051](#)), ([CHI0060](#))

47 [Q 2](#) (Will Gardner)

48 Written evidence from Girlguiding ([CHI0026](#))

49 Written evidence from YouthLink Scotland ([CHI0006](#))

49. A 2015 survey conducted by Girlguiding UK supported this. It found that “of girls aged 11 to 21, 25% say they share campaigns they care about on social media and 30% sign online petitions.”⁵⁰
50. However, Ofcom also told the Committee that the children who participated in their qualitative research “had limited understanding of how search engines work, with most assuming that the results they saw were selected by some kind of authoritative figure, possibly employed by Google, who selected the ones which were most accurate.”⁵¹

50 Written evidence from Girlguiding ([CHI0026](#))

51 Ofcom, *Children and parents media use and attitudes report* (16 November 2016) https://www.ofcom.org.uk/_data/assets/pdf_file/0020/94025/Childrens-and-Parents-Media-Use-and-Attitudes-2016-Executive-summary.pdf [accessed 24 January 2017]

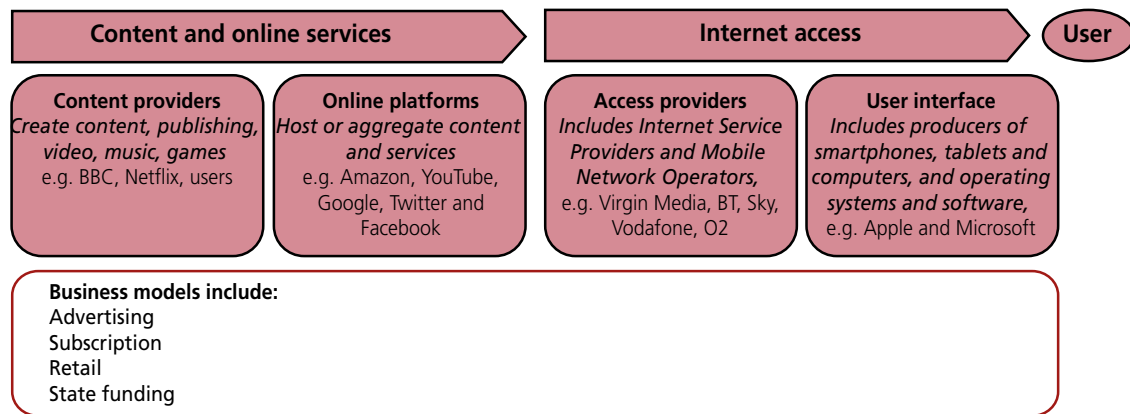
CHAPTER 2: THE ANATOMY OF THE INTERNET

51. The digital sector is still young and rapidly changing. Since the World Wide Web became accessible to the public 26 years ago, the internet has grown to dominate the developed world. In this Chapter we briefly consider the development and function of the internet at a simplified level for the purposes of understanding certain terms and principles in this report. This is a complex and contested area of inquiry, and one which is subject to change as the internet develops.
52. Initially delivered through the existing system of telephone cables, the internet developed into a ‘network of networks’ incorporating tens of thousands of interconnected computer networks, run by individual companies, universities, governments and others.⁵² It was designed to be a non-hierarchical structure with no one in overall control. The technical interoperability between the individual networks is coordinated by non-profit organisations, such as the Internet Corporation for Assigned Names and Numbers (ICANN), working on principles of openness and independence from any national governments. It is transnational, operating across legal jurisdictions with a culture of self-regulation or where possible no regulation at all.
53. Since the 1980s the internet’s development has been characterised by “the creative anarchy of small start-ups that succeed by creating a market for new products and services or disrupting old business models”.⁵³ Innovations continue to develop and to gain prominence among users. However, over time the internet has come to be dominated by a handful of giants.⁵⁴
54. In the UK, almost every aspect of life is now in some way mediated through the internet. It is used by governments, public bodies and services, educators, healthcare professional, businesses and families to communicate. While it is difficult therefore to speak of a single internet sector, a number of different types of businesses play a specific role in contributing to the internet’s ‘value chain’. The internet value chain denotes the structure of different groups of stakeholders who contribute to a user’s ability to access ‘content’ or online services. It is a complex matrix of individuals and organisations performing different functions according to various business models, but one simple way is to divide it into the following components.

52 Internet Society, ‘How it works’: <http://www.internetsociety.org/internet/how-it-works> [accessed 3 March 2017]

53 Livingstone, Carr and Byrne, One in Three: *Internet Governance and Children’s Rights* (2 November 2015): <https://www.ourinternet.org/research/one-three-internet-governance-and-childrens-rights> [accessed 3 March 2017]

54 Digital Trends, *How the father of the World Wide Web plans to reclaim it from Facebook and Google* (10 August 2016): <http://www.digitaltrends.com/web/ways-to-decentralize-the-web/#ixzz4aGmUYmxj> [accessed 3 March 2017]

Figure 3: Internet value chain

55. The first group of those contributing to the value chain are the ‘content providers’. These may be businesses which produce content themselves, for example by commissioning the production of television programmes, or businesses which aggregate the content of others, including those whose main content is from users (‘user-generated content’).
56. Content providers may have their own websites or services, for example BBC News or Netflix. Alternatively content may be hosted through multi-sided sites which connect different groups of users and businesses, ‘online platforms’, for example Amazon, YouTube and Facebook. The European Commission describes such platforms as covering “a wide-ranging set of activities including online advertising platforms, marketplaces, search engines, social media and creative content outlets, application distribution platforms, communications services, payment systems, and platforms for the collaborative economy.”⁵⁵
57. Search engines are an important example of a platform as they provide a conduit to other websites. Katie O’Donovan of Google explained that the search engine used automated algorithms to return results “based on a number of different indicators ... to understand what would be the most relevant search”.⁵⁶ These indicators could include indicators of the quality of the website, based on how many people link to the site and whether it is linked to by other reputable sites. Information filters (such as Google’s Ads and Facebook’s Newsfeed) select and present information such as advertisements or news stories using automated algorithms in the same way.
58. However, without human intervention, such automated processes can return some perverse outcomes. It has been reported that Google’s autocomplete function returned the word “evil” when a user inputs the phrase “are women”. The same word was autocompleted when certain ethnic and religious groups were entered. Google have since corrected this and issued a statement saying “Autocomplete predictions are algorithmically generated based on users’ search activity and interests. Users search for such a wide range of material on the web—15% of searches we see every day are new. Because of this, terms that appear in autocomplete may be unexpected or unpleasant.

55 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and Committee of the Regions on Online Platforms and the Digital Single Market Opportunities and Challenges for Europe. [COM\(2016\) 288 final](#)

56 [Q 117](#) (Katie O’Donovan)

We do our best to prevent offensive terms, like porn and hate speech, from appearing, but we acknowledge that autocomplete isn't an exact science and we're always working to improve our algorithms."⁵⁷

59. Whatever the specific problems in that case, a more fundamental problem highlighted by some was the lack of transparency in how this algorithmic processing works.⁵⁸
60. Search engine services like many others are indirectly paid for through advertising, not least through contextual advertising and sponsored links which are given priority among search results.
61. Internet Service Providers (ISPs) are businesses which provide users with access to the internet through fixed access such as through broadband. They in turn are clients of the Tier 1 network companies that own the transnational underwater cables. In the UK, Virgin Media, BT, Sky and TalkTalk are described as the 'big four' (ISP's) and together they account for 90% of home broadband provision.⁵⁹ Increasingly a number of these companies are beginning to provide public Wi-Fi hotspots and free Wi-Fi in public places.
62. Mobile Network Operators (MNOs) provide another source of internet access through mobile data. In the UK, the largest four by market share are Vodafone, O2, EE (owned by BT) and Three.⁶⁰
63. The final level of the value chain is the user interface in the form of both hardware, such as smartphones, tablets, computers and smart TVs, and software such as operating systems and app stores. Some of these may be produced by the same companies; for example Apple makes both devices and the operating systems that make them work. Increasingly, household objects and wearables are being added to the list of devices which access the internet.
64. The business models of different companies vary greatly. Hardware can be bought outright or free with subscription services. Users pay for a mixture of broadband connectivity and content services. Some content providers and hosts are state-funded or funded through donations, such as the BBC and Wikipedia respectively. Many platforms exchange online content and services for users' data, in effect selling access to the user, as a consumer, to a third party to target advertising. Google and Facebook are prominent examples of advertising-funded services. Like other online platforms, they have benefited from 'networks effects', "where, broadly speaking, the value of the service increases with the number of users"⁶¹ to take a large share of the online advertising market. According to a recent report by a consultancy firm, by 2020 these two companies will take 71% of the income from all

57 *The Guardian*, 'Google alters search autocomplete to remove 'are Jews evil' suggestion,' (5 December 2016): <https://www.theguardian.com/technology/2016/dec/05/google-alters-search-autocomplete-remove-are-jews-evil-suggestion> [accessed 2 March 2017]

58 Web Foundation, Three challenges for the web, according to its inventor (12 March 2017): <http://webfoundation.org/2017/03/web-turns-28-letter/> [accessed 15 March 2017]

59 Written evidence from the Children's Charities Coalition on Internet Safety (CHI0001)

60 Ofcom, *Communications Market Report 2016 (4 August 2016)*, p. 152: https://www.ofcom.org.uk/_data/assets/pdf_file/0024/26826/cmr_uk_2016.pdf [accessed 13 March 2017]

61 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and Committee of the Regions on Online Platforms and the Digital Single Market Opportunities and Challenges for Europe. [COM\(2016\) 288 final](#)

online display advertising in the UK.⁶² They have begun to monetise the analysis of so-called “big data”—that is, huge datasets of information about their users—in ways that are little understood and not open to scrutiny.

65. While the internet may be dominated by a handful of companies, it remains open for businesses and organisations of all sizes. Small businesses play an important role in generating innovation. But increasingly, they are developed in order that they might be bought up by the dominant players.
66. The Dark Web is the part of the World Wide Web that is only accessible by means of special, albeit easily accessible, software, allowing users and website operators to remain anonymous or untraceable. Some argue that it is “vital for people living in countries where you can be arrested, tortured, and killed for the things you do online.”⁶³ However it is also used for illegal transactions, drug selling and child pornography. As a former cyber-crime professional stated with “no possibility to penetrate it, criminals can continue their crimes on a global network. It’s very, very difficult for the police to penetrate, so it’s risk-free crime.” The specific dangers to children were noted by the former Prime Minister, David Cameron, saying it is “where paedophiles and perverts are sharing images, not using the normal parts of the internet that we all use.”⁶⁴
67. A number of our witnesses highlighted that seismic technological changes, which will change the nature of society, work and enterprise, present additional risks and opportunities for children. Many witnesses felt that it is imperative therefore that principles and good practice are established now to minimise future risks and hazards from these innovative uses of the internet.
68. Emerging trends include the ‘Internet of Things’, whereby every-day appliances collect and transmit information, artificial intelligence (AI) and machine learning—in each case, they have increased the capacity for automated decision making to provide goods and services. The value of these innovations is not yet established, but they are considered the future of the digital economy.

62 Jasper Jackson, ‘Google and Facebook to take 71% of UK online ad revenue by 2020’, *The Guardian* (15 December 2016): <https://www.theguardian.com/media/2016/dec/15/google-facebook-uk-online-ad-revenue> [accessed 13 March 2017]

63 BBC, *What is the dark web and is it a threat?* <http://www.bbc.co.uk/guides/z9j6nbk> [accessed 23 February 2017]

64 BBC, *What is the dark web and is it a threat?* <http://www.bbc.co.uk/guides/z9j6nbk> [accessed 2 March 2017]

CHAPTER 3: INTERACTIONS WITH THE DIGITAL WORLD

Introduction

69. In this Chapter we investigate the main issues which affect how children interact with the internet. First, we look at the skills required for children to navigate the digital world, what sort of content children can access, and how they interact with it and other people. We then consider what impact time spent online can have on children's development, wellbeing and mental health. Finally, we consider what rights children enjoy online, and what impediments there are to these.

Digital Literacy

70. There is no agreed definition of the term 'digital literacy' and it is sometimes taken to mean the minimum level of skills and knowledge needed for using computers and technology. However, in the 5Rights Framework the term encompasses "the skills to use, create and critique digital technologies" and the knowledge "to critically understand the structures and syntax of the digital world, and to be confident in managing new social norms".⁶⁵ We consider this usage to be particularly instructive and useful.
71. Learning digital skills, including but not exclusively the writing of computer code, will be crucial as technology continues to develop.⁶⁶ Parent Zone cited a 2013 study which suggested that "47% of all jobs in the US are susceptible to automation".⁶⁷
72. This view is in line with the conclusions of the House of Lords Digital Skills Committee, which advocated greater digital literacy in the UK to address "seismic changes brought about by changing technologies".⁶⁸ It found that the need for digital literacy is not only for careers in IT, but is also "an essential tool that underpins other subjects and almost all jobs".⁶⁹
73. Digital skills and literacy are not only necessary for a child's future career. Research by Parent Zone and the Oxford Internet Institute found that a child's level of digital skills and confidence was one of two factors that were positively correlated to building online resilience.⁷⁰ Such skills underpin a child's ability to navigate the online world.⁷¹
74. However, research by BT identified "behavioural barriers preventing children from developing tech literacy skills and considering tech careers."⁷² These are set out in Box 2.

65 5Rights, *The right to digital literacy* <http://5rightsframework.com/the-5-rights/the-right-to-digital-literacy.html> [accessed 2 March 2017]

66 Written evidence from Samsung Electronics UK (CHI0029)

67 Written evidence from Parent Zone (CHI0011) citing Carl Benedikt Frey and Michael A. Osborne, 'The future of employment: how susceptible are jobs to computerisation?' (17 September 2013): http://www.oxfordmartin.ox.ac.uk/downloads/academic/The_Future_of_Employment.pdf

68 Select Committee on Digital Skills, *Make or Break: The UK's Digital Future* (Report of Session 2014–15, HL Paper 111)

69 *Ibid.*

70 Written evidence from Parent Zone (CHI0011). The other factor is parenting.

71 Q 93 (Dr Marc Bush and Dr Nihara Krause)

72 Written evidence from BT (CHI0020)

Box 2: Behavioural barriers preventing children from developing tech literacy skills and considering tech careers

Children have mixed feelings about technology and are getting conflicting and confusing messages about its use. At school they are told they need strong computational thinking skills but at home told to spend less time on their devices.

The slicker the technology gets, the more it erodes children's curiosity and, unlike analogue devices, it is not designed to be tinkered with.

The language used and emphasis on coding makes it appear dull and 'nerdy' instead of dynamic.

Source: Written evidence from BT (CHI0020)

75. In BT's view it was essential for these barriers to be overcome:

"It is important that children grow up as knowledgeable, practical and empowered digital citizens so that they understand social norms in a digital world and can manage risks for themselves ... For young people to be empowered, they need to understand how technology impacts their lives. With digital technology developing at such a fast rate and many adults not keeping pace or being tech literate, children need to learn about the realities of the digital world and be confident in managing the new social norms and their reputation online."⁷³

76. 'Critical understanding' is a key aspect of digital literacy. It was defined by Ofcom as a "way of describing the skills and knowledge children need to understand, question and manage their media environment." These are essential skills for children to develop as they enable them to "get the benefits it [the internet] has to offer, and avoid the risks."⁷⁴

77. However Ofcom noted that the "complexity of the online environment makes it more difficult for children to develop critical understanding."⁷⁵

78. Vicki Shotbolt of Parent Zone told us that children "are on the receiving end of a tsunami of information—there is a vast amount of information—and helping them to navigate their way through it and develop critical reasoning skills is really challenging."⁷⁶ She added:

"There is a real gap in the area of more reliable information. You used to be able to watch the BBC and would pretty much know that what you saw was true. Now, they are getting their newsfeeds from Facebook, and they have no skilled editors to make sure that what they receive is truthful."⁷⁷

79. The Personal, Social, Health and Education Association believed that it is imperative that "children are taught skills to think critically about the information that they encounter online."⁷⁸ YouthLink Scotland suggested that "Digital literacy education should also include teaching children and

73 Written evidence from BT (CHI0020)

74 Ofcom, *Children and parents media use and attitudes report* (16 November 2015) https://www.ofcom.org.uk/_data/assets/pdf_file/0024/78513/childrens_parents_nov2015.pdf [accessed 24 January 2017]

75 Ofcom, *Children and parents media use and attitudes report* (16 November 2015) https://www.ofcom.org.uk/_data/assets/pdf_file/0024/78513/childrens_parents_nov2015.pdf [accessed 24 January 2017]

76 Q 24 (Vicki Shotbolt)

77 Q 24 (Vicki Shotbolt)

78 Written evidence from PSHE Association (CHI0005)

young people to be critical consumers in order to understand how and why content is created.”⁷⁹

80. The BBC told the Committee that “Children’s levels of critical awareness—about advertising messages, about how services are funded (and therefore whether they are being sold to) and about the extent to which they can trust information—are relatively low, given the ubiquity of internet use.”⁸⁰ Ofcom research demonstrated that less than half of 12-15s who go online in 2015 were aware of paid endorsements by vloggers (47%) or personalised advertising (45%).⁸¹
81. A small but significant proportion of children believe that certain kinds of online information are “always true”, according to Ofcom. However, this proportion grew between 2014 and 2015. The proportion of 8-11s and 12-15s who visit news websites or apps and who answered that all the information on these sites is true increased (23% vs. 12% for 8-11s and 14% vs. 8% for 12-15s). There was also an increase in the proportion of 8-11s who say this for sites used for school work or homework (28% vs. 20%) and among 12-15s, who say this for social media sites or apps (9% vs. 4%). Ofcom links this poor critical understanding to a failure to understand the reasons behind online safety messages.⁸²
82. The question of critical understanding became topical in the light of the large numbers of fake news stories during and after the US presidential elections.⁸³
83. Simon Milner of Facebook assured us that “much less than 1% of the content on Facebook may be inauthentic, a hoax, fake or whatever words you use”.⁸⁴ However, it was not clear from this what proportion of content which appeared to be news was fake. At any rate, he argued that there was “no evidence to suggest that the sharing of fake news in relation to the US election made a significant difference to the outcome of it”, but conceded that this had not provided a “good user experience”.⁸⁵
84. Fake news presented an additional problem for children as a result of their necessarily limited life experience. The problem was compounded by search engines and social media platforms using algorithms to prioritise stories according to a user’s past online activity.⁸⁶ This created a loop of similar information, often referred to as a ‘filter bubble’.
85. The lack of transparency with regard to these algorithms compounds the problem further. According to Horizon Digital Economy Research, based at the University of Nottingham, “Without transparency it is very difficult to identify what kind of bias these systems put on the information flows that children are exposed to.”⁸⁷

79 Written evidence from YouthLink Scotland ([CHI0006](#))

80 Written evidence from the BBC ([CHI0053](#))

81 Ofcom, *Children and parents media use and attitudes report* (16 November 2015) https://www.ofcom.org.uk/_data/assets/pdf_file/0024/78513/childrens_parents_nov2015.pdf [accessed 24 January 2017]

82 Written evidence from Ofcom ([CHI0060](#))

83 Written evidence from Alex Burchill ([CHI0065](#))

84 [Q 107](#) (Simon Milner)

85 *Ibid.*

86 Written evidence from Alex Burchill ([CHI0065](#))

87 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#))

Time online

86. Witnesses stated that there were varied outcomes to children’s wellbeing from the time they spend online. The findings of a study by the Chief Medical Officer in 2013 were “increased physiological arousal, decreased attention, hyperactivity, aggression, antisocial or fearful behaviour, social isolation and excessive use or ‘technological addiction’”.⁸⁸ YouthLink Scotland members raised concerns about excessive use which could “manifest as social isolation, sleep deprivation and dependency.”⁸⁹
87. Young Scot observed that the “impact of increased internet use on emotional development is different for each young person and depends entirely on their experience and circumstances.”⁹⁰ A report conducted by Parent Zone found that young people did not regard the internet as ‘separate’ or even ‘a thing’. Rather it was woven through their lives as a utility and its impact linked to mood, resilience and maturity.”⁹¹ Therefore it is difficult to isolate use of the internet as a cause.
88. Young Scot remarked that some found the internet a good source of support:
- “For some, the internet is comforting, as they realise that they are not alone in their problems and can talk to others going through the same. For others, they feel that the internet gives them confidence, as they can show and express parts of themselves they may have to conceal at school or home through an anonymous web profile.”⁹²
89. Barnardo’s stated that the “positive impact of the internet cannot be [overstated] in relation to children being able to have access to information, learn and socialise with friends. However, we are still grasping to fully understand what some of the negative impacts might be.”⁹³ Public Health England’s report, *How Healthy Behaviour Supports Children’s Wellbeing*, suggests that “specific types of internet activity (social networking sites, multi-player online games) have been associated with lower levels of wellbeing among children.”⁹⁴
90. Because the internet has grown to include so many aspects of children lives, it cannot be considered in isolation but it is essential to understand how interactions with internet services affect children’s wider experiences. The House of Commons Health Committee’s report ‘Children’s and adolescents’ mental health and CAMHS’ concluded that:
- “In our view sufficient concern has been raised to warrant a more detailed consideration of the impact of the internet on children’s and young people’s mental health, and in particular the use of social media and impact of pro-anorexia, self-harm and other inappropriate websites.”⁹⁵

88 [Q 132](#) (Nicola Blackwood MP)

89 Written evidence from YouthLink Scotland ([CHI0006](#))

90 Written evidence from Young Scot ([CHI0034](#))

91 Written evidence from Parent Zone ([CHI0011](#))

92 Written evidence from Young Scot ([CHI0034](#))

93 Written evidence from Barnardo’s ([CHI0013](#))

94 Public Health England, *How healthy behaviour supports children’s wellbeing* (August 2013) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/232978/Smart_Restart_280813_web.pdf [accessed 24 January 2017]

95 House of Commons Health Committee, *Children’s and adolescents’ mental health and CAMHS* (Third Report, Session 2014–15, HC 342)

91. Dr Bevington told the Committee, “we are absolutely clear, and have been for a long time, that it is what you are missing out by spending time on the internet that might be the more important bit.”⁹⁶
92. Others shared this concern that time spent on the internet could be having a detrimental impact on children’s ability to socialise ‘in the real world’. Young Scot warned that “children and young people often stay indoors and choose to interact online, rather than interacting with their peers face to face.”⁹⁷ The submission from the Wild Network, a non-profit organisation, focused on the impact of the internet on so-called Wild Time—“the time that children spend roaming free and playing wild”. They emphasised the importance of this time in “support[ing] countless aspects of their physical, mental, cognitive, and social wellbeing as well as the development of personal and community resilience.”⁹⁸ It was primarily concerned about the “indirect impact ... screen-based entertainment (including the Internet) has in terms of displacing children’s opportunities for Wild Time.”⁹⁹ BT agreed, saying that “Some children, particularly those who are unsupervised for long periods of time, can spend too much time online potentially denying them real world experiences, physical activity and social interaction.”¹⁰⁰
93. YouthLink Scotland members felt that internet use and outdoor activities were not mutually exclusive. They argued that it was more helpful to “find ways to combine digital learning with outdoor environmental engagement. It is possible to use technology designed to enhance rather than distract from time spent outdoors and engage with technology collectively (with real people in real time) rather than singularly.”¹⁰¹
94. Guidelines published by the American Academy of Pediatrics (AAP) in 1999 stated that screen time should be banned for children under the age of two. However these guidelines were updated in October 2016 and now state that for children younger than 18 months, use of screen media other than video-chatting should be discouraged. For those under 2 the new guidelines have changed from “avoid all screens under age 2” to “avoid solo media use in this age group.” For those aged 2 to 5 the AAP “recommends no more than an hour a day of screen use. And it wants caregivers to take part in screen time”.¹⁰²
95. Adam Kinsley from Sky said:
- “We are seeing an 80% year-on-year increase in downloads and streams of up to 10 million per week of children’s content and we have 4,500 hours of children’s content on here, which may bring us to another concern about screen time—how much you want them to see. ... The always-on culture and the amount of screen time is a fascinating area, and I have changed my mind on it—from thinking that it was a problem to recognising that screen time means all sorts of different things. Sometimes it will be educational, sometimes it will be relaxation,

96 Q 12 (Dr Dickon Bevington)

97 Written evidence from Young Scot (CHI0034)

98 Written evidence from Wild Network (CHI0019)

99 Written evidence from Wild Network (CHI0019)

100 Written evidence from BT (CHI0020)

101 Written evidence from YouthLink Scotland (CHI0006)

102 NPR, *American Academy of Pediatrics lifts ‘no screens under 2’ rule* (21 October 2016): <http://www.npr.org/sections/ed/2016/10/21/498550475/american-academy-of-pediatrics-lifts-no-screens-under-2-rule> [accessed 2 March 2017]

- sometimes it will be interactive and social and it is not necessarily a bad thing, and certainly restricting it could be quite dangerous.”¹⁰³
96. A recent report by the LSE Media Policy Project stated that an emphasis on screen time was misleading and that “parents should instead ask themselves and their children questions about screen *context* (where, when and how digital media are accessed), *content* (what is being watched or used), and *connections* (whether and how relationships are facilitated or impeded).”¹⁰⁴
 97. However the Government told the Committee: “we know that children and young people can feel unable to switch off from their online lives, which can be a source of stress.”¹⁰⁵
 98. Dr Krause defines this as “a different type of compulsive behaviour [to addiction]; it is almost like an obsessive behaviour, because often it is fear of being left out.” She explained “If there is a social invite going on, they do not want to be the one who does not get it in time. If there is an image shown for a very short time, they want to be up to see it; otherwise, they will miss it and they will be the one person who does not see it. There are some reports that that sort of constantly switched-on nature reduces intimacy and creates an increase in anxiety and checking.”¹⁰⁶
 99. Many witnesses specified the detrimental impact on sleep. The AAP states that all “children and teens need adequate sleep (8-12 hours, depending on age), physical activity (1 hour), and time away from media.”¹⁰⁷ Dr Bush remarked that “Sleep is a really important part of self-care, and neglecting it through the online world is yet another addition to a whole range of ways of not caring for yourself.”¹⁰⁸
 100. Analysis by Glasgow University showed that overall and night-time specific social media use along with emotional investment in social media were related to poorer sleep quality and lower self-esteem as well as higher anxiety and depression levels. “While overall social media use impacts on sleep quality, those who log on at night appear to be particularly affected. This may be mostly true of individuals who are highly emotionally invested. This means we have to think about how our kids use social media, in relation to time for switching off.”¹⁰⁹
 101. The Headmasters and Headmistresses Conference, in partnership with online safety organisation Digital Awareness UK, conducted a survey of 2,750 pupils aged 11-18, looking into teenage use of mobile devices overnight and the impact this is having on their health and wellbeing. The results can be found in Box 3.

103 [QQ 67–68](#) (Adam Kinsley)

104 LSE Media Policy Project, *Families and screen time: Current advice and emerging research* (July 2016): <http://eprints.lse.ac.uk/66927/1/Policy%20Brief%2017-%20Families%20%20Screen%20Time.pdf> [accessed 2 March 2017]

105 Written evidence from the Department for Culture, Media and Sport ([CHI0055](#)), ([CHI0067](#))

106 [Q 105](#) (Dr Nihara Krause)

107 NPR, *American Academy of Pediatrics lifts ‘no screens under 2’ rule* (21 October 2016): <http://www.npr.org/sections/ed/2016/10/21/498550475/american-academy-of-pediatrics-lifts-no-screens-under-2-rule> [accessed 2 March 2017]

108 [Q 105](#) (Dr Marc Bush)

109 University of Glasgow, *Pressure to be available 24/7 on social media causes teen anxiety and depression* (11 September 2015): http://www.gla.ac.uk/news/headline_419871_en.html [accessed 2 March 2017]

Box 3: Too much screen time?

- The survey found that almost half (45%) of students admit they check their mobile device after going to bed. Of those:
- A quarter (23%) check their mobile device more than 10 times a night
- A third (32%) of these students' parents are not aware that they check their mobile device after going to bed
- Almost all (94%) of these students are on social media after going to bed
- 70% of boys are playing games after going to bed
- 10% of students said they'd feel stressed about missing out if they didn't check their mobile device before going to sleep
- 38% of students said they'd be curious to know what's happening if they didn't check their mobile device before going to sleep¹⁰⁹

Source: HMC Annual Conference, Research: Teenage use of mobile devices during the night (October 2016): <http://www.hmc.org.uk/wp-content/uploads/2016/10/Mobile-Device-Media-Brief-FINAL.pdf>

102. The question of compulsive internet use was picked up by many. The 5Rights framework states: “We have allowed a system to develop where young people are looped into a technology designed [to] keep them attached. Based on the same principle as a casino slot machine. They are being trained to click.”¹¹⁰ Dr Slavtcheva-Petkova observed that out of 63 academic articles concerning internet-related harm, 7 presented evidence of internet addiction or problematic internet use.¹¹¹
103. One 12-year-old girl reportedly stated that: “The internet nearly always controls my actions. I have been told that I am addicted to the internet, and prefer its company rather than being with other people. I feel lost without the internet.”¹¹²
104. Dr Krause told the Committee that “Research is a little divided at the moment and is developing. If you look at the traditional ways of diagnosing an addiction, both DSM-5 and ICD-10, which are the diagnostic manuals to classify internet gaming disorder, are still unclear. They are waiting, pending further research, to see whether this is primarily a disorder.”¹¹³
105. Dr Henrietta Bowden-Jones suggested that “harmful use”¹¹⁴ might be a useful term.
106. Dr Krause explained: “a lot of young people who are vulnerable to compulsive misuse will use whatever the substance might be. In this case, it might be the internet or gaming.”¹¹⁵
107. In respect of the effects of children becoming addicted to online gaming, Dr Bowden-Jones said that:

110 5Rights, <http://5rightsframework.com/> [accessed 24 January 2017]

111 Written evidence from Dr Vera Slavtcheva-Petkova (CHI0054)

112 ‘The online generation: Four in 10 children are addicted to the internet’, *Independent* (8 May 2014) <http://www.independent.co.uk/life-style/gadgets-and-tech/news/the-online-generation-four-in-10-children-are-addicted-to-the-internet-9341159.html> [accessed 2 March 2017]

113 Q 103 (Dr Nihara Krause)

114 Q 12 (Dr Henrietta Bowden-Jones)

115 Q 103 (Dr Nihara Krause)

“They have now fragmented away from the nuclear family. They have lost weight. They are not exercising. Their mood is very low. They spend time being excited online and often then jump from gaming to porn to other types of sites that are very dark, and they have lost sight of who they are.”¹¹⁶... This gaming and this internet addiction as a whole is an issue that we not know enough about. We are not investing enough focus in terms of research and we are certainly not treating them in an evidence-based way, which therefore does not give us the understanding that we could have.”¹¹⁷

108. Dr Bevington observed that “we are commissioned to work with substances and not with the internet. I happen to think that, if you do not ask a young person about their online life, you are not taking a proper mental state history”.¹¹⁸ This was explained in terms of development by Dr Angharad Rudkin:

“Parents have to deal with young people who love the immediate gratification that they get from getting through a different level on a game or from watching a “Peppa Pig” film ... and [not] being able to realise that, if you do this all day long, this may impair your development. We are not quite sure yet, but it may have an impact on it [development]. It is very hard for young people to appreciate that” ... “they say, ‘I just cannot turn my phone off. I just cannot stop playing these games’ ... they do not yet have the capacity to think, ‘If I do this now, then in five years’ time I am not going to be very pleased that I did it’.”¹¹⁹

109. Dr Henrietta Bowden-Jones cited the work of Professor Jeff Derevensky at McGill University, who had investigated how games played by children from an early age might “prime” children’s brains and “how that might feed into the impulsivity that they already experience because of the late maturation of the frontal lobes.” According to Dr Bowden-Jones, playing computer games:

“might also make [children] into human beings who are much more sensitive to a dysregulation¹²⁰ of the reward pathways and more vulnerable to things such as pathological gambling, for example. Although no money is exchanged, there are continuous dopaminergic rushes in the brain as these children are constantly moved from one activity to the other with small rewards that are not monetary but are still relevant within the game.”¹²¹

110. The Children’s Media Foundation (CMF) on the other hand cited studies which had pointed to the benefits for children of appropriate digital platforms:

“Better hand eye coordination, dynamic spatial skills, improved language skills, self-discovery, and greater understanding [of] the world around them are a few of the positives. Accessing content on the internet—just like reading—is extremely empowering.”¹²²

116 [Q 12](#) (Dr Henrietta Bowden-Jones)

117 [QQ 11-12](#) (Dr Henrietta Bowden-Jones)

118 [Q 15](#) (Dr Dickon Bevington)

119 [Q 12](#) (Dr Angharad Rudkin)

120 This term refers to an abnormality or impairment in the regulation of a metabolic, physiological, or psychological process.

121 [Q 12](#) (Dr Henrietta Bowden-Jones)

122 Written evidence from the Children’s Media Foundation ([CHI0027](#))

Time out function?

111. A number of witnesses advocated the design of a time-out or time-limiting function. Katie O'Donovan of Google said that when it “launched YouTube for Kids, we developed a time limit so parents can choose how long they would like their children to use that for.”¹²³ Other providers have also designed in ‘time out or switching off’. Sky Kids designed a Sleep Mode into its new App so that parents and children can be introduced to the idea of the App going to sleep—rather than depending on discipline from a child.¹²⁴
112. Dr Krause thought that a time limit would be a “very helpful feature.” She said that ultimately “we want young people to learn how to implement that control themselves and regulate their behaviour, but if there was a general rule that all that stuff went off at the same time for everyone and no one was communicating, there would not be so much anxiety about being left out.”¹²⁵
113. Samsung agreed but they were focused on parents by offering, “tools on our devices which give parents greater control over their children’s internet use. Our free ‘Kids Mode’ app for smartphones and tablets lets parents control the apps that their children can use, the videos, music and other content they can access, and how long they can use a device.”¹²⁶
114. Concerns were raised about the way in which games and content moved to the next level or video automatically. Katie O’ Donovan of Google explained that “On YouTube, we are trying to serve content that is relevant to the viewer. If they have watched a video and we offer one that is similar and they do not want to watch it, they can very easily click pause or come out of the app and stop watching.”¹²⁷
115. Dr Bowden-Jones however felt that children had the need to pause: “Timeout is essential. I think timeout allows people a moment to get out of that tunnel and say, “Hang on a minute. I have just spent all my birthday money on eBay. Was that a good thing? Do I want to carry on?”¹²⁸ She compared it to gambling: “When your mind is so completely wrapped up with winning or losing and you are chasing losses, you have lost your critical faculties”.¹²⁹ However she pointed to a limitation in that if “you establish it on your own device, then in the heat of the moment you are only going to move to a different tablet or a different mobile phone. I do not have the answer, but, neurobiologically, I know that we could save a lot of people a lot of problems if we asked them to take a moment of rest before they question whether they really do want to continue with an activity.”¹³⁰

Distressing interactions and resilience*Online abuse and cyberbullying*

116. According to Will Gardner of Childnet, children consider bullying to be the most concerning aspect of the internet.¹³¹ Many witnesses pointed to

123 [Q 120](#) (Katie O’Donovan)

124 Written evidence from Sky ([CHI0038](#))

125 [Q 105](#) (Dr Nihara Krause)

126 Written evidence from Samsung Electronics UK ([CHI0029](#))

127 [Q 121](#) (Katie O’Donovan)

128 [Q 14](#) (Dr Henrietta Bowden-Jones)

129 [Q 14](#) (Dr Henrietta Bowden-Jones)

130 [Q 14](#) (Dr Henrietta Bowden-Jones)

131 [Q 1](#) (Will Gardner)

aggravating factors of bullying online. While it used to be the case that school bullying stopped when a child went home for the day, online bullying can go on ceaselessly. It can follow a child from one school to another. It also lacks face to face interaction, so a child may not see the harmful impact of what they are saying or doing upon another child.

117. Bullying does not have to be targeted at individual children to have a negative effect. A 2014 Girls' Attitudes Survey found that "45% of those aged 13 to 21 say that they have heard about sexist abuse of women in the media on social media channels and 49% say that this restricts what they do or aspire to in some way".¹³²
118. The 'always on' culture also has an impact on those children who may be victims of bullying. Nicola Blackwood MP, the Parliamentary Under-Secretary of State for Public Health and Innovation at the Department for Health, told the Committee: "It used to be that if you were bullied in one school you could leave, go to another school and leave it behind. You cannot really do that now."¹³³ This inability to "shut out" their harassers can have an extremely detrimental impact on a young person's mental health and wellbeing. Dr Bush told the Committee:
- "We have talked to young people who describe the distress they face in the playground because people are calling them names. That distress follows them on to their Facebook page, and it follows them on to their WhatsApp group among all their friends. Suddenly, it is as if they are always being seen; they cannot hide from that abuse. It is important to recognise that, because the constant surveillance means they feel that they are constantly under threat."¹³⁴
119. The majority of witnesses felt that further steps were necessary from platforms themselves. His Royal Highness The Duke of Cambridge said at the launch of The Royal Taskforce on Cyberbullying, "I think we have a chance to show that on this issue of bullying, technology can do more than create a patch for a problem it has presented; let's instead create an enduring, positive shift in our culture that could not have happened without technological advancement."¹³⁵

Content

120. Ofcom noted that parents were especially concerned by content that contained "violence; sexually explicit content; swearing; horror films and other 'scary' content; content that presented ideas and topics they didn't want their children to know about yet, for instance war or death; and content which might encourage emulation of risky behaviour."¹³⁶
121. The NSPCC confirmed that children equally are adversely affected by inappropriate content, including: "content that they felt incited them to self-harm; to compete to lose weight; and that allowed them to access violent

132 Written evidence from Girlguiding ([CHI0026](#))

133 [Q 137](#) (Nicola Blackwood MP)

134 [Q 99](#) (Dr Marc Bush)

135 BBC, *Prince William forms cyber-bullying task force* (16 June 2016): <http://www.bbc.co.uk/newsround/36549044> [accessed 2 March 2017]

136 Written evidence from Ofcom ([CHI0051](#)), ([CHI0060](#))

and degrading portrayals of sex. Young people tell us that they feel anxious, shocked, and guilty as a result of what they have seen online.”¹³⁷

122. Dr Julia Fossi of the NSPCC also noted the “inadvertent popping up” of such content. She explained, “They use a social-networking site to chat to friends, then on the side-lines there is a news article, an image, or an advert for pornography that pops up that they are not expecting but have to deal with there and then, with no context or anybody around them to help them understand where that has come from.”¹³⁸
123. Indeed in their written evidence the NSPCC emphasised that “children are as likely to accidentally stumble upon pornographic content online as they are to actively search for it”. According to the NSPCC this problem is in part the result of the fact that “Sites are often rated as 13+ for ease, when they are actually designed for adults and expose young people to harmful content or contact”. This is because “categorisation for sites is not based on the content or nature of the platform but relates to privacy laws.”¹³⁹
124. South West Grid for Learning (SWGfL), a non-profit organisation, brought up the content within games. Games have PEGI (age) ratings but these are “either ignored by them as players or not understood by parents”. SWGfL gives the example of ‘Grand Theft Auto’: “This is clearly rated as 18 with warnings on graphic content, sexual material, alcohol & drugs. However when we talk to children it is clear that nearly all year 4 [aged 8 or 9 years old] plus children know the game and can tell you about the characters.”¹⁴⁰
125. Online pornography has emerged as a particular concern for policy makers, children, parents and carers. Barnardo’s cautioned that in some cases “the internet is where children first ‘learn’ about sex, meaning they can attempt to imitate what they have viewed online, which may be extreme and violent.”¹⁴¹
126. John Carr, of the Children’s Charities Coalition on Internet Safety, emphasised that the pornography which is now readily available through the internet is of a different kind altogether from what has previously been available in print. He explained, “Overwhelmingly, it is anti-women violence, although there are other aspects to it, and the idea that any child or young person could ever learn anything of any value or use about sex, relationships or anything of the kind from some of the sites that I have had to look at from time to time is completely absurd.”¹⁴²
127. Evidence from the British Board of Film Classification (BBFC) supported the idea that online pornography is of a different kind to what is available offline:

“A significant proportion of [online pornography] would not be classifiable by the BBFC (because for example it features content that would be deemed obscene under CPS guidelines; involves violence and/or implied lack of consent; involves the infliction of pain or acts which

137 Written evidence from the NSPCC ([CHI0014](#))

138 [Q 23](#) (Dr Julia Fossi)

139 Written evidence from the NSPCC ([CHI0014](#))

140 Written evidence from South West Grid for Learning ([CHI0009](#))

141 Written evidence from Barnardo’s ([CHI0013](#))

142 [Q 3](#) (John Carr OBE)

may cause lasting physical harm; or features material likely to encourage an interest in sexually abusive activity).”¹⁴³

128. The National Council for Women cited research indicating that viewing this kind of pornography causes children to develop dysfunctional attitudes towards sex:

“Viewing pornography can lead to an acceptance of violent and unhealthy notions of sex and relationships, where women are treated as sex objects and aggressive and violent sexual behaviour is regarded as the norm. Learning about sex without any relationship connections - pornography is a poor sex educator. Exposure to pornography helps to sustain young people’s adherence to sexist and unhealthy notions of sex and relationships.”¹⁴⁴

129. Evidence from Girlguiding supported this view:

“The 2015 Girls’ Attitudes Survey found that 53% of young women aged 17 to 21 think that girls are coerced into sex acts because boys are copying what they see in pornography and 71% of those aged 17 to 21 think that pornography gives out confusing messages about sexual consent.”¹⁴⁵

130. According to the BBFC, “This has led to the normalisation of largely unfettered access to the strongest, sometimes unlawful, pornography by children online.”¹⁴⁶ Baroness Howe of Idlicote cited a report from the Children’s Commissioner which stated that, as a result of routine access to such extreme and violent images: “too many boys believe that they have an absolute entitlement to sex at any time, in any place, in any way and with whomever they wish ... too often girls feel they have no alternative but to submit to boys’ demands, regardless of their own wishes.”¹⁴⁷

Child sexual abuse

131. The connected nature of internet technology has the potential to be exploited by child abusers. The National Crime Agency (NCA) explained the different ways in which this may happen: “Online child sexual exploitation includes indecent images of children (IIOC), online grooming, sexual extortion of children and live streaming of child sexual abuse.” The NCA notes that, while the extent of online child sexual exploitation is difficult to quantify, law enforcement is seeing more reports of child sexual exploitation and abuse (CSEA) than ever before.

132. With regard to grooming, the NCA explained that the internet can be used to achieve two objectives:

“(a) to lure the child into a physical meeting with the offender for the purposes of contact sexual abuse and/or;

143 Written evidence from BBFC ([CHI0025](#)), ([CHI0064](#))

144 Written evidence from the National Council of Women ([CHI0030](#))

145 Written evidence from Girlguiding ([CHI0026](#))

146 Written evidence from BBFC ([CHI0025](#)), ([CHI0064](#))

147 Written evidence from Baroness Howe of Idlicote ([CHI0017](#))

“(b) to manipulate victims into abusing themselves in view of the offender via webcam and generate indecent images (and video) of themselves for the offender.”¹⁴⁸

133. Barnardo’s explained:

“While many of the children are still from backgrounds where they are vulnerable to abuse due to being disadvantaged, abused or neglected, children are also now presenting from homes where they have secure attachments to their parents and a protective environment around them ... Increased access to the internet—particularly via smartphones—and, commonly, a lack of awareness among parents about their children’s online activities, is leaving more young people at risk of forming relationships with abusers online”.¹⁴⁹

134. Broadcasting images of child sexual abuse through the internet is a separate, but related, form of online harm: “The victim is condemned to repeated re-victimisation, violation and degradation each time the image or video is accessed. Fear of people viewing the content, can prevent the victim from speaking out about their experiences and seeking help.”¹⁵⁰

135. The NSPCC told us that there is a particular risk that children may feel complicit if they have sent the groomer images or videos: “They may be less inclined to disclose their abuse due to the perception that they will be judged by others for their actions and that they are somehow to blame, meaning that they may not receive the support that they desperately need.”¹⁵¹

Body image

136. Issues of body image and self-esteem have been raised as one particularly negative aspect of greater internet use, often relating to social media. The rise of the ‘selfie’ and the sharing of photos through popular apps such as Instagram, Facebook and Snapchat are all believed to contribute, in some users, to unrealistic expectations of body image.

137. Karl Hopwood told the Committee “What worries me the most is what mainly, but not exclusively, girls, say about the pressure that they feel to look a certain way and to behave in a certain way when they go online.” He referenced a Children’s Society report produced in September 2016 which found that “34% of 10 to 15 year-old girls are unhappy with their appearance, and a lot of that was put down to pressure by social media. That is something that is quietly causing real concerns.”¹⁵²

138. It was noted by some witnesses that these types of behaviour are not a new development but that the internet has provided new tools to enable them in a more immediate way. Dr Bush told the Committee:

“Behaviours that perhaps were there before are becoming more prominent. A lot of the work that has been done on early teenage sexuality has shown that a disproportionate number of early teenagers

148 Written evidence from National Crime Agency ([CHI0043](#))

149 Written evidence from Barnardo’s ([CHI0013](#))

150 Written evidence from the NSPCC ([CHI0014](#))

151 Written evidence from the NSPCC ([CHI0014](#))

152 [Q 53](#) (Karl Hopwood)

are shaving body parts to reflect the kind of bodies they are exposed to online. There are different forms of augmentation.”

139. He observed that:

“The digital world allows you to do that [augment] in the most creative and beautiful ways, but also in ways that create a lot of distress. Most of the surveys, to summarise them, say that most children and young people have augmented their face or body on social media to make themselves look more like the images they see on their Facebook feed, for instance.”¹⁵³

140. Dr Nihara Krause noted, “There is an interaction between the person and their vulnerabilities and issues, together with what is outside. That is true of anything. We are all subjected to, say, social media or body images, but not all of us will go on to develop an eating disorder.”¹⁵⁴

141. Will Gardner referenced the findings of the recent study *Net Children Go Mobile*:

“Girls ... have a worse time online in relation to this area, and that is really important to flag up. It is not exclusive; it is not just about girls; but I think that is very much worth taking into account. Therefore, we need to think about issues relating to body image, peer pressure and other such things,”¹⁵⁵

142. Dr Bush told the Committee that:

“We know that the promotion of different kinds of augmented and enhanced bodies online is affecting young men. Lots of men are starting to become obsessed with exercise; they are exercising on injury or to injury; they are ingesting things that damage their physical as well as mental health ... it is effectively a form of eating disorder—self-harm through ingestion and body dysmorphia.”¹⁵⁶

Importance as a support network

143. Several witnesses stressed the importance of the internet as a support network to those children who felt isolated or disenfranchised. Parent Zone informed the Committee that “This generation of digital natives prefer to access support from their friends and from anonymous online communities.”¹⁵⁷ Dr Powell said “Our results suggest that spending more time on social networks reduces the satisfaction that young people feel with all aspects of their lives, except for their friendships, where the effect is positive.”¹⁵⁸

144. Facebook told us that:

“When they are mentally challenged, it helps to bring people together who are suffering from the same condition, if you like. Not all young people have happy home lives. Unfortunately, we hear all the time about young people who are in the most stressful situations at home, not

153 [Q 102](#) (Dr Marc Bush)

154 [Q 103](#) (Dr Nihara Krause)

155 [Q 4](#) (Will Gardner)

156 [Q 102](#) (Dr Marc Bush)

157 Written evidence from Parent Zone ([CHI0011](#))

158 Written evidence from Parent Zone ([CHI0011](#))

when at school. Therefore, having the ability to access secret groups on Facebook, where their parents do not see what they are doing, can be very important for those young people.”¹⁵⁹

145. Dr Powell observed that:

“An important methodological issue relates to the direction of causality of the relationship between wellbeing and social media use. We have stated here that social media use is an input and wellbeing is an output, but it can also be argued that causality may go in the opposite direction because children with lower levels of psychological wellbeing may choose to spend more time on social media.”¹⁶⁰

Dr Powell noted that there may be additional factors “(for example loneliness or introversion) that drive both social media use and wellbeing. Failing to account for these factors may result in misleading estimates of the effect of social media use on wellbeing.”¹⁶¹

146. A recent study by the Varkey Foundation into those born between 1995 and 2001 looked at wellbeing, hopes and values. The study drew on attitudes, behaviours and experiences across 20 countries. In regard to the UK it found that although the net happiness score was 57%, the second lowest score out of the 20 countries, the largest cause for hope was technological advancements. The survey found that the pressures of social media were seen by ten per cent of young people, across all countries, as one of their main sources of anxiety. The survey stated that “young people everywhere placed great faith in both technological advance and increased communication - which they hope will promote greater cooperation between peoples over the longer term.”¹⁶²

147. There was a general consensus that more research was needed into this area. Barnardo’s told the Committee that there was “minimal concrete evidence about how the internet—and social media in particular—may be affecting social development in areas such as attention span, empathy or self-esteem.”¹⁶³ YouthLink Scotland were “concerned” about the lack of sufficient research on the “impact of increased internet usage alongside increased usage of digital devices on children and young people’s development and mental health.”

148. The Government told us that:

“As a response to the recommendation of the Health Select Committee on Children’s Mental Health on the impact of the online world on children and young people, the Department of Health has also created a specific training package in partnership with MindEd and Xenzone ... aimed at improving the knowledge of children and young people’s mental health among professionals who work with children.”¹⁶⁴

149. The Children’s Society recommended that “The Department for Culture, Media and Sport should commission research to explore the links between

159 Q 120 (Simon Milner)

160 Written evidence from Dr Philip Powell (CHI0008)

161 Written evidence from Dr Philip Powell (CHI0008)

162 Varkey Foundation, *What the world’s young people think and feel* (January 2017): <https://www.varkeyfoundation.org/sites/default/files/Global%20Young%20People%20Report%20%28digital%29%20NEW%20%281%29.pdf> [accessed 8 February 2017]

163 Written evidence from Barnardo’s (CHI0013)

164 Written evidence from the Department for Culture, Media and Sport (CHI0055), (CHI0067)

young people’s mental health and well-being, girls in particular, and social media usage.”¹⁶⁵

150. Nicola Blackwood MP told us that in her annual report the Chief Medical Officer had found that “while there are a lot of positive influences ... bullying and repeated exposure to negative influences are also there.”¹⁶⁶ However she noted that there was a “weakness of evidence” in this area and as a result of this the Department has commissioned a prevalence study which “will estimate the extent of mental ill health in the two to 19 year-old population”.¹⁶⁷ This is due to be published in 2018.

Digital resilience

151. Recent policy and research developments have led to the use of the term ‘digital resilience’. Young Minds defined it as “the social and emotional literacy and digital competency to positively respond to and deal with any risks they might be exposed to when they are using social media or going online.”¹⁶⁸ Vodafone informed the Committee that they were working with the “Diana Award to help build teens’ emotional resilience across various areas of online safety, starting with cyberbullying to help them develop the ability to cope with anything that comes up in their digital lives.”¹⁶⁹
152. Baroness Shields explained that digital resilience could help in protecting children in relation to user generated content:

“A young person may upload an explicit photo of themselves. That photo becomes part of the internet, and there is no way to recall it. It is much easier to take down a piece of content that is developed by a publishing company or an organisation than to take down something that is user generated. The best way in which to deal with the second scenario is to develop digital resilience ... building digital resilience into the curriculum and helping young people to become digitally independent and confident in their choices, so that they do not make that mistake in the first place.”¹⁷⁰

153. A working group has been set up under the UK Council for Child Internet Safety to look at digital resilience. The aims of the group are:

“To develop and co-ordinate activity on a new digital resilience strategy to enable children and young people as well as their parents, carers and teachers, to have the digital skills and emotional understanding to feel empowered to take action when they encounter problems online.”¹⁷¹

154. Edward Timpson MP told the Committee:

“Trying to build in the digital resilience of young people—from a much earlier age than we ever imagined—is one of the best defence mechanisms

165 Written evidence from The Children’s Society ([CHI0004](#))

166 [Q 132](#) (Nicola Blackwood MP)

167 *Ibid.*

168 Young Minds, *Resilience for the digital world* (January 2016): http://www.youngminds.org.uk/assets/0002/6859/Resilience_for_the_Digital_World_YM_Positioning.pdf [accessed 24 January 2017]

169 Written evidence from Vodafone UK ([CHI0023](#))

170 [Q 129](#) (Baroness Shields OBE)

171 UKCCIS, ‘Digital Resilience Group: Terms of Reference’ (October 2016): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573114/Digital_Resilience_WG_-_Final_Terms_of_Reference_1_.docx.pdf [accessed 2 March 2017]

that we have available to us to ensure that, as we become more savvy as adults, we also have a generation of children coming through who are even better prepared for many of the risks, as well as the benefits, that the internet has to offer.”¹⁷²

155. Mr Timpson explained the Government’s role in promoting resilience in schools:

“Since September 2014 we have had the new computer curriculum, which sets out all four key stages, right the way through primary and secondary school. Children will acquire an escalating level of knowledge at those four key stages. Those are exactly the tools that they will need to cope with what the demands of e-safety will be for them.”¹⁷³

156. Karl Hopwood, an e-safety consultant and former head teacher, told us that this requirement to teach online safety was an important shift in policy. However, he urged that teaching in this area should be broader:

“Too often the focus is on risk and harm and perhaps not looking at some of those much more important skills, which they will be using for the rest of their lives, to be quite honest, when they are using this sort of communication. There are many opportunities to do that, but my worry is that a lot of colleagues in schools—not every school, clearly—do not feel that they can deal with this, because young people are talking about things that they are not familiar with or comfortable with; but that critical thinking comes back to basic pedagogy, in my view.”¹⁷⁴

Children’s rights and commercialisation

Children’s rights

157. As we saw in Chapter 1 the rights provided for under the UNCRC have not been well implemented with respect to the internet. These rights are sometimes divided into three groups:

- Rights to Provision: to the resources, skills, education and contributions necessary for the survival and full development of the child.
- Rights to Protection: including protection from all forms of child abuse, neglect, exploitation and cruelty, and preservation of the right to privacy.
- Rights to Participation: including the right to express opinions and be heard, the right to information and freedom of association.

158. Whilst there has been a concerted effort to prevent child sexual abuse perpetrated or facilitated through the internet¹⁷⁵ other rights, such as rights to access, information, privacy and participation, have been neglected.¹⁷⁶

159. Wendy Grossman, a journalist, identified that implementing children’s rights online can be problematic because they often conflict:

172 [Q 130](#) (Edward Timpson MP)

173 [Q 131](#) (Edward Timpson MP)

174 [Q 95](#) (Karl Hopwood)

175 [Q 28](#) (Susie Hargreaves)

176 Livingstone, Carr and Byrne, ‘One in Three: Internet Governance and Children’s Rights’ <https://www.ourinternet.org/research/one-three-internet-governance-and-childrens-rights> [accessed 3 March 2017]

“Children, like everyone else, have fundamental rights: access to information, freedom of expression, privacy. Filtering, blocking, age verification, monitoring, and imposing a duty of care all have consequences for these rights.”¹⁷⁷

She, along with other witnesses,¹⁷⁸ was concerned that, when presented with such conflicts, too often schools, campaigners and policy makers privilege restrictive child protection policies at the expense of other rights.

160. The 5Rights Framework interprets the UNCRC for the digital sphere and suggests that children’s rights be implemented on and offline equally.

161. The Government has stated:

“Material published on the Internet, or by mobile phone, etc, is subject to the same restrictions as material published elsewhere: in other words, what is illegal offline is illegal online ... The law does not differentiate between criminal offences committed on social media or anywhere else—it is the action that is illegal.”¹⁷⁹

Privacy and data protection

162. As we saw in Chapter 2, the use of a consumer’s data to create advertising revenue is one of the key ways that much of the internet’s content and services are financed. It can also have some advantages for user experience. For example, ‘cookies’ retain information about a user so that the user can continue playing a game without having to restart each time. There is also a potential for the large databases of longitudinal data to be used for research.

163. However, the routine, commercial use of data presents particular privacy concerns for children. The Information Commissioner’s Office (ICO) told us that, while the collection and analysis of personal data is not necessarily a negative phenomenon, individuals must be “given an appropriate degree of transparency, choice and control at appropriate points in their online activity.”¹⁸⁰ In the case of children, however, this could be difficult or impossible. Moreover, “it may be impossible to differentiate between an adult or a child user”.

164. The internet enables content to be saved, stored and reproduced, and used in multiple ways. In the UK the Data Protection Act 1998, which derives from EU legislation, provides that individuals’ personal data should not be collected unless it is for a proper purpose and in compliance with certain rules. The EU has recently adopted new legislation in this area, the General Data Protection Regulation (GDPR), which seeks to consolidate and update data protection rights. There are concerns, however, that the EU’s high standards of data protection are not matched in other jurisdictions, including the USA where the most popular technology firms are based and to where data is often transferred.

165. Box 4 lists some of the key provisions which enhance the rights of children in respect of online data protection.

177 Written evidence from Wendy Grossman (CHI0046)

178 For example, Professor Andy Phippen (CHI0045), defenddigitalme (CHI0042)

179 Written evidence from the Department for Culture, Media and Sport (CHI0055), (CHI0067)

180 Written evidence from the Information Commissioner’s Office (CHI0049)

Box 4: Selection of provisions under the GDPR to enhance the protection of children’s personal data online

- Consent: where consent is the legal basis for the collection and processing of data,¹⁸¹ it must be “informed” and an “unambiguous indication of the data subject’s wishes”. Furthermore, it must be either explicit or indicated by a “clear affirmative action” (Article 4). “Silence, pre-ticked boxes or inactivity should not ... constitute consent.” (Recital 32).
- Age limit: Children below the age of 16 may not give consent to processing by online service providers and so normally parental consent is required. Member States are, however, permitted to provide for a lower age in law, as long as it is not below 13 (Article 8).
- Plain language: where services requiring data processing are targeted to a child, information and communication should be in such a clear and plain language that the child can easily understand (Article 12 and Recital 58).
- ‘Right to be forgotten’: The GDPR enshrines in legislation the right of data subjects to require individuals and companies to erase their personal data where it is no longer necessary for the purposes for which it was collected or where the data subject withdraws their consent for processing and there are no other legitimate grounds (Article 17). This right “is relevant in particular where the data subject has given his or her consent as a child and is not fully aware of the risks involved by the processing, and later wants to remove such personal data, especially on the internet” (Recital 65).

Source: ICO, *Key areas to consider*: <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/key-areas-to-consider/> [accessed 6 February 2017]

166. The Regulation requires Member States to transpose its provisions into domestic legislation by May 2018.¹⁸² It is likely therefore that this will come into effect in the UK before the UK leaves the EU. Nonetheless, once the UK has left, there may be pressure to lower these standards once again.
167. In the UK there is currently no specific age limit, or indeed any other provisions which specifically engage children’s rights to data protection. However, the ICO says that it would expect “a data controller to take into account the obligations associated with processing of a child’s data imposed by society and thus should have a high level of security and privacy by default.”¹⁸³ Steve Wood of the ICO explained that this allowed for greater flexibility. But Girlguiding argued that greater clarity would be desirable.¹⁸⁴
168. The GDPR sets the limit at which a child can consent to have their data collected at 16, but allows individual Member States the discretion to lower this limit down to 13 when they transpose the Regulation into domestic law. This may prove difficult to enforce as many children under 16, and even under the existing US minimum age of 13, already use social media and other services.¹⁸⁵ Some of our witnesses noted that the selection of the

181 [Article 6, GDPR](#) lists possible grounds for the legal processing of personal data. Consent is normally required in relation to social media. ‘Processing’ includes the collecting, recording, organising, storing and otherwise using personal data.

182 [Article 51, GDPR](#)

183 Written evidence from the Information Commissioner’s Office ([CHI0049](#))

184 Written evidence from Girlguiding ([CHI0026](#))

185 [Q 117](#) (Simon Milner)

EU age limit appears to have been largely political.¹⁸⁶ It is not clear that an assessment with children was carried out.

169. When individuals use internet services and platforms, they must normally consent for their personal data to be processed by the service provider, usually by agreeing to terms and conditions of use. Baroness Shields explained that people are not aware of their data protection rights although these can be found in the terms and conditions:

“[They are] buried inside the legalese and ... very complicated and difficult for a parent to teach or for a child to understand. You often give consent without care, just by accepting the terms and conditions. The companies have reacted very well, by creating safety centres where they detail exactly what types of data they are collecting. They are very good about privacy notices and various other things, but you have to know that you are looking for that and where to find it.”¹⁸⁷

170. Many children lack the ability to understand how their data are being used. Horizon, a research programme at the University of Nottingham, hosted a series of ‘youth juries’, workshops in which children are invited to discuss hypothetical scenarios concerning internet use. One young person said, “The companies are really smart, because they know most young people don’t want to sit there reading, like, paragraphs and paragraphs about it. And even if you did the way it’s worded it’s complicated so they know people won’t understand it”.¹⁸⁸

171. Professor Derek McAuley, the Director of the Horizon, expanded upon this further in oral evidence:

“I fear that most adults do not understand their rights when it comes to online platforms. How many of you read the terms and conditions? The basis of informed consent as the basis for all data processing is somewhat flawed, to say the least. There is a fundamental problem in that certainly in terms and conditions—and you saw in some of our evidence children talking quite eloquently on terms and conditions—the reading age is often 21 or 22. It requires undergraduate if not postgraduate education to read the text—not to understand the law and the legal implications. I do not think the kids understand it.”¹⁸⁹

172. In other sectors businesses must “display prominently” the most important terms and conditions which affect the rights and responsibilities of consumers. Often there is a designated regulator to ensure that this is done properly and clearly.

173. The Children’s Commissioner’s Digital Taskforce commissioned Schillings, a law firm, to rewrite the terms and conditions of Instagram in language that would be more easily understood by children. These were published in a report in January 2017, an extract of which can be found in Box 5.

186 For example, written evidence from Dr Victoria Nash, Oxford Internet Institute ([CHI0021](#))

187 [Q 130](#) (Baroness Shields OBE)

188 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#))

189 [Q 81](#)

Box 5: Clearly written Terms and Conditions

“Officially you own any original pictures and videos you post, but we are allowed to use them, and we can let others use them we well, anywhere around the world. Other people might pay us to use them and we will not pay you for that.”

“Although you are responsible for the information you put on Instagram, we may keep, use and share your personal information with companies connected with Instagram. This information includes your name, email address, school, where you live, pictures, phone number, your likes and dislikes, where you go, who your friends are, how often you use Instagram, and any other personal information we find such as your birthday or who you are chatting with, including in private messages (DMs).”

Source: Children’s Commissioner, *Growing Up Digital: A report of the Growing Up Digital Taskforce (January 2017)*: http://www.childrenscommissioner.gov.uk/sites/default/files/publications/Growing%20Up%20Digital%20Taskforce%20Report%20January%202017_0.pdf

174. The rewritten terms and conditions were tested with a group of children, one of whom commented:

“I think they should show these terms and conditions to people who sign up because otherwise you don’t really know what you’re signing up to. I would use Direct Messaging a lot less if I knew they could read them.”

The Children’s Commissioner’s report concludes “that the current offering by websites and apps to their users is not acceptable.”¹⁹⁰

175. Indeed, according to Horizon, when children were told what their data were being used for, there was a sense of being manipulated and exploited. As one young person put it: “It’s the way it’s like marketised; it’s so friendly and appealing. It’s like, ‘Enable cookies’. It’s like, you wouldn’t reject a cookie because a cookie is ... a nice thing to have.”¹⁹¹

176. Some witnesses pointed out that it is not only the length and language of terms and conditions that are at fault, but the fact that they take huge data sets when in fact they could in the case of children under 18 take only what they need to provide services.¹⁹²

177. The accumulation of data which can be accessed online, whether individuals have actively uploaded images of themselves or have had their internet activities automatically tracked, is sometimes referred to as their ‘digital footprint’. Such information can be embarrassing and intrusive to children both immediately and in later life when they try to apply for university, work, insurance and credit.¹⁹³ In 2014 the Court of Justice of the European Union ruled that in certain circumstances Google, and other search engines, should be required to remove links to websites containing information about an individual which appear to be “inadequate, irrelevant or no longer relevant

190 Children’s Commissioner, *Growing Up Digital: A report of the Growing Up Digital Taskforce (January 2017)*: http://www.childrenscommissioner.gov.uk/sites/default/files/publications/Growing%20Up%20Digital%20Taskforce%20Report%20January%202017_0.pdf [accessed 23 February 2017]

191 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#)), citing Internet on Trial Youth Juries Report, section 3.1

192 [Q 43](#) (Prof Derek McAuley)

193 See, for example, written evidence from Parent Zone ([CHI0011](#)).

or excessive in the light of the time that had elapsed.”¹⁹⁴ This became known as the ‘right to be forgotten’. Steve Wood of ICO told us:

“People thought it was about censorship, deleting information; quite strong analogies were used about taking books out of libraries ... The reality is that it is a proportionate tool for individuals to control their information. Equally, it is not a magic bullet in solving quite a difficult problem; if you have a mass of information about you on the internet, it is very difficult to get it removed.”¹⁹⁵

178. This right was explicitly reflected in Article 17 of the GDPR. Parent Zone welcomed these as “positive steps” but argued that they were not entirely satisfactory: “A more comprehensive review that includes updating the Data Protection Act is worth exploring”¹⁹⁶

179. There is increasingly a risk that data will not be secure. More devices are becoming ‘connected’, and more businesses are collecting data, leading to “hacks, mishaps or simple complacency”.¹⁹⁷ Dr Victoria Nash told the Committee that:

“In an era where much-loved toys such as Barbie and Lego offer opportunities for online games and voice recording, where even very young children are encouraged to use toy cameras that allow their pictures to be uploaded to a hackable website, and where online banking is available to those aged 11 and up, the risks around misuse of children’s data are greatly expanded.”¹⁹⁸

180. The ICO told us, “in reality there may be little that can be done to prevent unscrupulous third parties from harvesting a child’s data and using it for inappropriate purposes.” Brass Horn argued, “The only way to truly prevent such leaks is to not collect the data in the first place.”¹⁹⁹

Advertising

181. According to the Internet Advertising Bureau, an industry body, in the UK, “online and mobile has a higher share of the total advertising market (43% of a total £20.1bn) than in any other country in the world.”²⁰⁰ The Internet Advertising Bureau informed the Committee that advertisers use the data held by social media platforms about their users to ‘design’ an audience for their advertising campaign that matches their target demographic(s). Young Scot commented:

“These online profiles can (and have been) be sold to future employers and educators, so online habits are increasingly affecting young people’s future chances.”²⁰¹

194 *Google Spain SL, Google Inc. v Agencia Española de Protección de Datos, Mario Costeja González* (13 May 2014) Case C131/12

195 [Q 47](#) (Steve Wood)

196 Written evidence from Parent Zone ([CHI0011](#))

197 Written evidence from the Children’s Media Foundation ([CHI0027](#))

198 Written evidence from Dr Victoria Nash, Oxford Internet Institute ([CHI0021](#)). See also written evidence from Horizon Digital Economy Research, University of Nottingham ([CTI0032](#)).

199 Written evidence from Brass Horn Communications ([CHI0041](#))

200 Written evidence from International Advertising Bureau UK ([CHI0036](#))

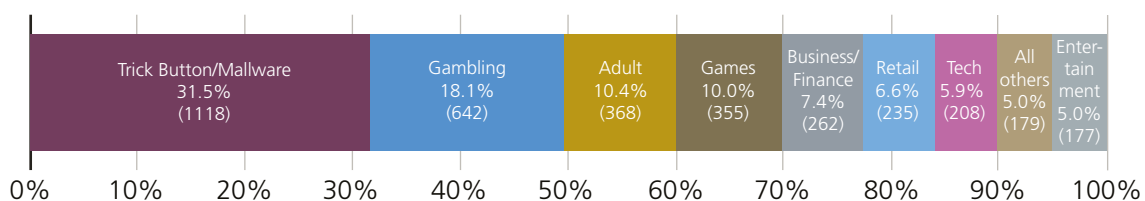
201 Written evidence from Young Scot ([CHI0034](#))

182. The Internet Advertising Body told us, “EU advertising and media trade bodies have published good practice guidance for all EU and EEA markets to enhance transparency and user control for online behavioural advertising (OBA). The 7 Principles of this good practice are: notice, user choice, data security, sensitive segmentation, education, compliance and enforcement and review.”²⁰² The advertising industry also supports MediaSmart, a children’s media literacy programme.
183. However, less than one in six 8-11s and a third of 12-15s in 2015 were able to correctly identify advertising displayed in online search results. In 2015, children aged 8-15 who used search engine websites were shown a picture of the results returned by Google for an online search for ‘trainers’. Their attention was drawn to the first two results at the top of the list, which were distinguished by an orange box with the word ‘Ad’ written in it. Despite this labelling, only a minority of 8-11s (16%) and 12-15s (31%) correctly identified these sponsored links as advertising.”²⁰³

Piracy

184. The term ‘internet piracy’ is generally associated with copyright infringement. The illegal sharing of music and audio-visual content online has been a serious concern for the entertainment industry over the last ten years, following the increases in internet capacity and device ownership.
185. 11-15 year olds are the largest demographic who commit piracy. John Carr told the Committee that “children and young people who are attracted to or use piracy sites, quite apart from engaging in unlawful activity are also becoming immersed in highly unsavoury environments which are likely to be injurious to their health and personal development.”²⁰⁴
186. A study by the Motion Picture Association (MPA) found that, amongst the top 250 unauthorised sites in Europe, advertising is the predominant revenue source.²⁰⁵ The chart below shows the categories of adverts found on the unauthorised sites:

Figure 4: Categories of adverts found on unauthorised sites



Source: Incopro, ‘The revenue sources available to those providing copyright content without consent in the UK’ (March 2015)

187. The Children’s Charities’ Coalition on Internet Safety cited Dr Watters of the University of Ballarat who analysed 500 pirate sites. He found that only 1 per cent of the advertising on the sites came from mainstream businesses.

202 Written evidence from International Advertising Bureau UK ([CHI0036](#))

203 Written evidence from Ofcom ([CHI0051](#)), ([CHI0060](#))

204 Written evidence from the Children’s Charities Coalition on Internet Safety ([CHI0001](#)), ([CHI0057](#))

205 Incopro, *The revenue sources available to those providing copyright content without consent in the UK* (March 2015): <http://www.incopro.co.uk/resources-news-events/case-studies-reports/> [accessed 2 March 2017]

20 percent were linked to sex, 46 per cent were classed as malware and 3 per cent associated with offshore, unregulated gambling.²⁰⁶ This demonstrates that a consumer accessing these sites has a high probability of exposure to harmful content such as malware, gambling and adult material.

206 Written evidence from the Children's Charities Coalition on Internet Safety ([CHI0001](#)), ([CHI0057](#))

CHAPTER 4: RESPONSIBILITIES AND RECOMMENDATIONS

188. In the previous Chapter, we explored aspects of children's use of the internet. In this Chapter we examine in further detail who is responsible for maximising opportunities for children to make the best use of the internet by making it both more child-friendly and safe.
189. It is in the interest of the whole of society that children grow up to be empowered, digitally confident citizens. It is therefore a shared responsibility for everyone: to improve opportunities for children to use the internet productively; to improve digital literacy; to change the norms of data collection and privacy when the user is a child; to design technology in ways that support children by default; for adults to have better understanding of internet technologies so that they can support children's online experience; to invest in the digital resilience of children in order to minimize harm; to deliver all the rights online that children enjoy offline, and to remember that they are not only end users, but children.
190. These responsibilities will not be static but continually changing as technology changes. It is imperative that general principles are established to provide a framework for future action.
191. In mapping out where specific responsibilities lie it is worth remembering that the ubiquity of the internet means that children can access it in the privacy of their room, at a friend's house, on public Wi-Fi, using mobile data, or at school. No one can be supervising them at all times, nor would it be appropriate that they should.
192. **Children of all age groups inhabit a world that seamlessly flows between on and offline. In order to thrive in both they need the protections and privileges that they enjoy offline. Digital technologies are the present and the future of these 21st century children. They will define their opportunities as workers and as citizens. These opportunities need to be upheld and shaped by many different stakeholders.**

Parents and carers

193. Parents and carers have a primary responsibility to ensure that their own children use the internet safely. Parent Zone, a charity, told us that "good enough parenting" was one of only two factors that could be positively correlated to building online resilience. Its evidence quoted the developmental psychologist Diana Baumrind as saying that the fundamental role of the parent is to raise a child "that is socialised to the society they are growing up in"²⁰⁷ and concluded that "parents are right to recognise the need to raise children who can flourish in a digital world".
194. The Family Online Safety Institute (FOSI), an international non-profit organisation funded by industry, highlighted the importance of parents taking an active part in managing, or 'mediating', their children's internet use noting that "parents who often use technology with their child are more confident that they can manage their child's technology use." Accordingly, it "strongly suggests that parents and children go online together from an

207 Written evidence from Parent Zone (CHI0011) citing *A shared responsibility, building children's online resilience*, Dr Andrew Przybylski, 2014: <http://parentzone.org.uk/article/building-childrens-online-resilience>, and *New directions in socialization research*: Diana Baumrind, 1980. The other factor was digital literacy.

early age to help develop ongoing conversations about appropriate use of technology.”²⁰⁸

195. Ofcom highlighted four ways in which parents mediate their children’s internet use:
- using technical tools, such as network-level filters, enabling safe search mode, and software to limit time spent online;
 - regularly talking to their children about managing online risks;
 - supervising their child; and
 - having rules about access to the internet or behaviour while online.²⁰⁹
196. According to Ofcom’s research over 90 per cent of parents of 5–15s who go online mediate their internet access in one of these ways. 57 per cent of such parents use technical tools. FOSI agreed that the majority of parents have rules about their child’s technology use. According to research that FOSI carried out in 2015 in the USA, “75% of parents have specific rules about what their children can or cannot post publicly online.”²¹⁰
197. However, these figures conceal a variety of different levels of engagement. For example, Ofcom’s list of possible solutions includes “software to protect against junk email/spam or computer viruses”. While this is important, it does not address the risks posed by exposure to inappropriate content. Of the parents who do not use technical tools, around half say that they prefer to talk to their children and use other methods of mediation; others trust their children to be responsible. There is natural variation in how parents approach mediation, and “they can range from quite intrusive to just sitting down and talking about it”.²¹¹
198. Wendy Grossman, a journalist, noted that some view parents who choose not use filtering systems as “somehow negligent”. She repudiated this notion: “different people have different values and beliefs about educating their children, and there should be no stigma attached to electing a different path than the government of the day would like”²¹². We endorse her advice that parents should not be stigmatised on the basis of parenting style, but note that trusting children to be responsible cannot prevent them from seeing unsuitable content given much of that content is delivered to children without their actively looking for it.
199. Our witnesses identified several problems with relying on parental controls. Some parents simply lack the knowledge to mediate their children’s internet use effectively: “Almost a fifth (19%) of parents are worried their lack of

208 Written evidence from Family Online Safety Institute (CHI0033)

209 Written evidence from Ofcom (CHI0051)

210 Written evidence from Family Online Safety Institute (CHI0033). Family Online Safety Institute, *Parents, Privacy & Technology Use* (November 2015): <https://www.fosi.org/policy-research/parents-privacy-technology-use/>

211 Q 56 (Adam Kinsley)

212 Written evidence from Wendy Grossman (CHI0046)

tech skills could be putting their children at risk—44% say their children’s expertise outstrips their own.”²¹³

200. David Miles, an online safety expert, suggested that these gaps are likely to be compounded as technology continues to become more sophisticated: “The growing encryption of browsers, websites, messaging services and many popular apps, is likely to make it increasingly difficult for parents to control or manage their children’s activities online. Accessibility through gaming devices, TVs and the inexorable move towards the Internet of Things, will only serve to compound the problem.”²¹⁴
201. The Children’s Charities Coalition on Internet Safety agreed:
- “What we are talking about, in essence, are the skills needed for 21st Century parenting. That repertoire of skills must now include a knowledge of how the internet fits into young people’s lives and how best to support children and young people in the use of the technology.”²¹⁵
202. Research from Ofcom shows that many parents try to educate themselves using a range of different sources.²¹⁶ The Children’s Media Foundation told us: “There is no doubt that parents need to be helped to play a bigger part in their children’s media literacy and media use. However, in our view the efforts to help adults understand their children’s digital lives are disjointed and piecemeal and therefore ineffective.”²¹⁷
203. According to Internet Matters:
- “In the past Government would have invested significant sums in public service broadcasting, to help drive home the message that parents need to get involved. However, pressure on budgets means that this is no longer an option ... [despite] significant progress and investment in the range and availability of technical tools across networks, devices and platforms, there has not been a comparable investment in driving awareness, education and engagement of parents.”²¹⁸
204. Professor Phippen was more critical of parents: “When working with charities who deliver parental information sessions around online safety, I have seen poorly attended (in some cases non-attended) sessions—it seems that for many parents their view is that schools should be attending to child development in this area.”²¹⁹
205. Indeed some of our witnesses suggested that parents were deliberately acting contrary to the best interests of their children, in particular by posting content which affects their children’s privacy or data protection. FOSI carried out research in the US, which showed that “19% of parents who have social networking accounts, acknowledge having posted something online that their child may find embarrassing in the future. 13% of parents say that

213 Written evidence from Three (CHI0016). Three cited uSwitch, *Parents’ grip slipping on youngest children as four-year-olds surf internet unsupervised* (6 January 2016): <https://www.uswitch.com/media-centre/2016/01/parents-grip-slipping-on-youngest-children-as-four-year-olds-surf-internet-unsupervised/>

214 Written evidence from David Miles Consulting (CHI0012)

215 Written evidence from the Children’s Charities’ Coalition on Internet Safety (CHI0001), (CHI0057)

216 Written evidence from Ofcom (CHI0051), (CHI0060)

217 Written evidence from the Children’s Media Foundation (CHI0027)

218 Written evidence from Internet Matters (CHI0040)

219 Written evidence from Prof Andy Phippen (CHI0045)

their child has already been embarrassed by something they have posted, and 10% say their child has asked them to remove an online post that relates to them.”²²⁰

206. Horizon corroborated this, citing a 2010 study by internet security firm AVG, which showed that “92% of children in the United States have an online presence (due to their parents’ disclosures) by the time they are two years old.”²²¹
207. Relatedly, Simon Milner of Facebook told us that parents actively assist their children who are under 13 in setting up Facebook accounts in breach of their rules, which are designed to protect children’s privacy online.²²²
208. On the other hand, some witnesses said that too much emphasis was being placed on parents. Parent Zone advocated the need for greater and more coherent support:
- “Parents ... are being overwhelmed with information about specific risks—often through the lens of the tabloid press—with very limited access to parenting support. Helping parents to develop parenting skills that are adequate to the task of raising digital citizens is vital. We have a crisis that should be dealt with as a public health issue and the response should involve multiple stakeholders.”²²³
209. Others argued that industry should have a greater share of the responsibility. The Children’s Media Foundation wrote:
- “The main focus of industry efforts on safe-guarding children has been levelled at better parental information. This is partially because of a lack of consensus about how to address the issues, but also because of lobbying from the main industry players that they are merely proving the ‘pipes’ for content providers and therefore not responsible for any digressions ... In our opinion, this approach is not sufficient. And we would like to see the new distributors, gatekeepers and search providers make a 21st Century contract with parents and children that they will in future put the needs of children first and foremost, ahead of advertisers, data-miners and brands who all have a vested interest in [practices which] manipulate or influence younger audiences for commercial gain.”²²⁴
210. A policy response that relies on parenting also fails to account for parents who are by choice or circumstance neglectful. Dr Dickon Bevington told us that evidence indicates that children with pre-existing vulnerabilities are most likely to suffer actual harm from “exposure to extreme internet-mediated experience”.²²⁵ By relying only on parents to mediate their children’s online activity, there is a risk that the most vulnerable children in society, and those who are most likely to experience actual harm from the internet, are not being protected.

220 Family Online Safety Institute ‘Parents, Privacy & Technology Use’ (November 2015), p. 22: <https://www.fosi.org/policy-research/parents-privacy-technology-use/> [accessed 13 March 2017]

221 Written evidence from Horizon Digital Economy Research, University of Nottingham (CHI0032)

222 Q 117 (Simon Milner)

223 Written evidence from Parent Zone (CHI0011)

224 Written evidence from the Children’s Media Foundation (CHI0027)

225 Q 11 (Dr Dickon Bevington)

211. Parent Zone told us that there had been a government department leading on parenting work and “significant investment was made in the creation of the National Family and Parenting Institute. That infrastructure has now gone. Parenting has lost its voice in government at a time when it needs it most.”²²⁶
212. Baroness Howe of Idlicote argued that there should be a duty on the Government “to educate parents about the use of family friendly filtering, online safety tools and how to protect their children from risky behaviour online (e.g. bullying and sexual grooming). This could lead to leaflets being available in places parents regularly go, such as schools, libraries, doctors’ surgeries etc.”²²⁷
213. Internet safety experts Will Gardner and John Carr discussed the possibility of the Government issuing a public service broadcast or media campaign to give parents a message on online safety.²²⁸
214. Mr Gardner suggested that there might be scope for such a campaign on individual topics but he was sceptical that an online campaign could deliver all that was necessary:
- “There have been big public awareness campaigns before, and the UK Council for Child Internet Safety has those. “Zip it, Block it, Flag it” was the message that was put out on bus stops, and there have been other attempts to do that. My sense is that it has to be more sustained than that, and the budget is not there to provide that in a sustainable way.”²²⁹
215. Mr Carr told us that the idea was good in principle but the Government has simply not put in enough money:
- “I think a sustained public campaign, public health-type of approach, would benefit us greatly. The problem up to now is that the Government have not been willing to spend any money on this type of public education work. They have relied entirely on the industry to do it. The industry has stepped up to a degree; there is no question about that. They have done very well; they have got something called Internet Matters ... But in relation to the total size of the problem and the challenge, it is nowhere near being enough, and it certainly does not match anything like you get in the public health field. So I would certainly welcome a shift in emphasis in that sort of way.”²³⁰
216. ***Parents and carers need clearly communicated information about the digital world. We recommend that the Government and industry should invest in regular public campaigns to promote information and tools that help parents and carers. In particular, a campaign with a short memorable message, similar to the Green Cross Code, should be developed. It should focus on creating confidence in online parenting.***

226 Written evidence from Parent Zone ([CHI0011](#))

227 Written evidence from Baroness Howe of Idlicote ([CHI0017](#))

228 [Q 6](#) (Will Gardner and John Carr OBE)

229 [Q 6](#) (Will Gardner)

230 [Q 6](#) (John Carr OBE)

217. *We recommend that specific training modules be developed and made compulsory as part of qualifying in frontline public service roles, including but not limited to, police, social workers, general practitioners, accident and emergency practitioners, mental healthcare workers and teachers.*

Regulators, law enforcement and civil society

218. There are a number of public, private and voluntary bodies which contribute towards children's outcomes online.
219. A number of bodies regulate specific aspects of the internet. Ofcom regulates video-on-demand programme services which include on-demand internet services but it does not have a general remit to regulate internet content.²³¹ Indeed Tony Close, the Director of Content Standards, Licensing and Enforcement at Ofcom, made clear to us that Ofcom does not think that it would be well placed to do so.²³² The Communications Act 2003 does, however, require Ofcom to promote media literacy, to monitor internet content and to advise the public on online safety.
220. The British Board of Film Classification (BBFC) is the UK's regulator of film and video. It operates a classification regime and publishes Classification Guidelines, with a primary aim to classify content according to the age for which it is appropriate. It has put itself forward for the new role of regulating online pornography for the purposes of the Digital Economy Bill.
221. The Advertising Standards Authority (ASA) is the regulator of advertising across all media. It applies the Advertising Codes, which are written by the Committees of Advertising Practice, and its work includes acting on complaints and proactively checking the media to take action against misleading, harmful or offensive advertisements.
222. The Information Commissioner's Office (ICO) is responsible for handling complaints in respect of data protection law and for encouraging good practice. It will be instrumental in the implementation of the GDPR, and it has advocated that the UK should maintain equivalent provisions following its departure from the EU. However, the Children's Media Foundation criticised it on the grounds that "Potentially unsafe practices are unlikely to be addressed [by ICO] unless there is a problem".²³³
223. The police and other law enforcement agencies are responsible for enforcing the criminal law online. In respect of child sexual abuse, law enforcement agencies are assisted by the Internet Watch Foundation (IWF), an independent body set up to identify and block images of the sexual abuse of children on the internet. While it has no formal powers of its own, once it finds child sexual abuse content, it notifies the National Crime Agency (NCA) which give permission to it to issue a notice for take-down.
224. The NCA has a command for cybercrime and another for child sexual exploitation.²³⁴ These agencies also help provide resources:

231 See Appendix 6.

232 Q 81 (Tony Close)

233 Written evidence from the Children's Media Foundation (CHI0028)

234 This is the Child Exploitation and Online Protection Centre (CEOP).

‘Thinkuknow’ is an education programme developed by the NCA with three strands: children; parents and professionals. It provides high quality education about sex, relationships and the internet aimed at reducing the vulnerability of children and young people to sexual abuse and exploitation. These messages are delivered through a network of over 140,000 professionals across the UK.”²³⁵

225. The position of Children’s Commissioner was established by statute to promote and protect the rights of all children in England. The position works with the Government and public bodies to improve policy and practice relating to the care system, and to ensure that children’s voices are heard. This involves consistent and systematic consultation with young people in all aspects of the Children’s Commissioner’s work. The current Commissioner, Anne Longfield, has set up a Digital Taskforce to explore children’s experiences online. We noted in the previous Chapter that its report called for clear terms and conditions of use. It also recommended that the Commissioner’s existing power to request information from public bodies be extended to cover aggregate data from social media services.
226. The UK Council for Child Internet Safety (UKCCIS) is a group of more than 200 organisations drawn from across government, industry, law, academia and charity sectors. The Council was established following a Government-sponsored report by Professor Tanya Byron in 2008. It discusses and takes action on topical issues concerning children’s use of the internet. It has five working groups set up to consider social media, education, evidence, technology and digital resilience. It is chaired by Ministers from the Department for Culture, Media and Sport, the Home Office, and the Department for Education.²³⁶
227. Barnardo’s recommended that the remit of UKCCIS should be expanded to include “child internet welfare as well as child internet safety”.²³⁷
228. According to a number of our witnesses, the lack of a joined-up and coherent regulatory framework has given rise to a gap between regulation in the online and offline worlds, in particular with regard to inappropriate content. The BBFC told us:
- “The regulatory framework that has developed in the offline world to protect children from content - for example dangerous and imitable behaviour, self-harm, suicide, drug misuse and violence - that is likely to impair their development and wellbeing has not transferred to the online space. Pornography is of particular concern.”²³⁸
229. Independent research commissioned by the BBFC in 2015 found that “85% of parents consider it important to have consistent classifications off and online ... As more viewing takes place online, consumers expect that the same level of regulation will apply online as currently applies offline.”²³⁹
230. Baroness Howe of Idlicote and CARE agreed that there should be a consistency of approach in regulating different types of media, whether it is accessed

235 Written evidence from National Crime Agency (CHI0043)

236 Department for Culture, Media and Sport, *UK Council for Child Internet Safety (UKCCIS)*: <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis> [accessed 13 March 2017]

237 Written evidence from Barnardo’s (CHI0013)

238 Written evidence from BBFC (CHI0025), (CHI0064)

239 Written evidence from BBFC (CHI0025), (CHI0064), citing Bernice Hardie 2015

online or offline. They each gave the example that material which has been rated ‘18’ by the BBFC should be deemed inappropriate online and should only be accessible through age verification.²⁴⁰ The NSPCC recommend that all websites and other online services should clearly show a ‘site-rating’ stating the age range for which its content is suitable.²⁴¹ Girlguiding also advocated a consistency of approach and recommended “bringing online media in line with the principles of the broadcast watershed.”²⁴²

231. User-generated content poses a serious practical impediment to this suggestion, however. Most users are not trying to market their content and so have no incentive to have it certified. Moreover, there is far too much user-generated content for a body such as the BBFC to review. The Audiovisual Media Services Directive (AVMSD) is an EU legislative instrument which regulates (among other things) the provision of “TV-like content” online. The European Commission has proposed amendments to the AVMSD seeking to harmonise standards and to extend the scope of the AVMSD to user-generated content. In written evidence, the BBFC told the Committee that it supported the extension of the scope of the AVMSD. When we later asked David Austin, the Chief Executive of the BBFC, to explain how this could work, he told us that a Dutch regulator was already piloting a programme to allow other users to self-certify content and to certify other content which they see online.
232. Over the course of the inquiry the Committee heard evidence from all many of the above organisations, and from four Government Ministers. We were struck by the number and fragmented nature of organisations organised to manage internet harms. We also noted that the evidence we received showed increasing levels of reported harms by young people. Therefore we concluded that the current matrix of Government and regulatory responsibility was not working.

Industry

233. Businesses that operate online have a particular responsibility for ensuring children inhabit the online world in a way that is age-appropriate and empowering. Furthermore, industry is also best placed to create services and innovations which are child friendly.

Moderating and taking down content

234. Many of the largest online platforms have made clear that they are not interested in taking ‘editorial control’ over content posted on their site. With regard to the publication of false information on newsfeeds, Simon Milner of Facebook told us that his company did not wish to become “arbiters of truth”.²⁴³
235. Horizon, a research institute, explained that these sites rely on “protections afforded to communications service providers and prefer not to moderate content in advance, but rely on take-down requests for illegal or inappropriate content.” Horizon conceded that some do provide the means to label content

240 Written evidence from Baroness Howe of Idlicote ([CHI0017](#)) and CARE ([CHI0022](#))

241 Written evidence from NSPCC ([CHI0014](#))

242 Written evidence from Girlguiding ([CHI0026](#))

243 [Q 107](#) (Simon Milner)

as “adult”, but that there is no further granulation of advice according to different age groups.²⁴⁴

236. Alice Webb of BBC Children’s recognised that the BBC’s policy of moderating all content on the platforms was labour-intensive.²⁴⁵
237. Nonetheless, the Government told us that it expected social media and interactive services to have processes in place to address inappropriate or abusive content on their sites: “This includes having clear reporting channels, acting promptly to assess reports, and removing content that does not comply with their acceptable use policies or terms and conditions.”²⁴⁶ Most social media sites and online platforms publish ‘community standards’, but it has recently been reported that Facebook declined to remove 82 out of a 100 images which appeared to BBC journalists to break its guidelines when they reported them.²⁴⁷ It is unclear to what extent they, or other social media and content host services, take active steps to search for and take down content which is in contravention of their own published rules.
238. The government of Australia has established the position of Children’s eSafety Commissioner to administer complaints from children about cyberbullying.²⁴⁸ The Children’s Commissioner has recommended that the UK go a step further in establishing a Children’s Digital Ombudsman to “mediate between under-18s and social media companies over the removal of content. It should operate in a similar way to the UK Financial Ombudsman Service and be funded by social media companies themselves but be completely independent of them.”²⁴⁹ This would enable children to challenge “any content that they have accessed via common social media platforms that they are able to report”,²⁵⁰ for example pornography or hate speech.
239. As we saw in the previous Chapter, the terms and conditions of social media companies are themselves often at odds with children’s right to privacy. The group of children we spoke to said that they were aware that, if they did not like content of themselves posted on social media, they could report it, but they acknowledged that normally it is for the uploader of the content to take it down. When asked, they all said that they would like the right to have content taken down.²⁵¹
240. ***The Committee supports children’s right to have upsetting content that concerns themselves removed. All businesses operating online, particularly companies which provide social media and content-sharing platforms services such as Google and Facebook, should respond quickly to requests by children to take down content. Where***

244 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#))

245 [Q 77](#) (Alice Webb)

246 Written evidence from the Department for Culture, Media and Sport ([CHI0055](#)), ([CHI0067](#))

247 BBC, *Facebook failed to remove sexualised images of children (7 March 2017)*: <http://www.bbc.co.uk/news/technology-39187929>

248 Australian Government, *Office of the Children’s eSafety Commissioner* <https://esafety.gov.au/about-the-office/role-of-the-office> [accessed 17 March 2017]

249 Children’s Commissioner, *Growing Up Digital: A report of the Growing Up Digital Taskforce (January 2017)*: http://www.childrenscommissioner.gov.uk/sites/default/files/publications/Growing%20Up%20Digital%20Taskforce%20Report%20January%202017_0.pdf [accessed 23 February 2017]

250 Children’s Commissioner, *Growing up Digital: A report of the Growing Up Digital Taskforce (January 2017)*, p 13: <https://www.childrenscommissioner.gov.uk/news/children-left-fend-themselves-digital-world> [accessed 22 February 2017]

251 See Appendix 7.

innappropriate content that concerns a child is reported by third parties, similar processes should be followed.

241. *Minimum standards should be adopted that specify maximum timeframes for report and response. Companies should publish both targets and data concerning complaint resolution.*
242. *All platforms and businesses operating online should proactively remove content which does not comply with their own published standards.*
243. *We recommend that, as suggested by the Children’s Commissioner, her power to request information from public bodies should be expanded to include aggregated data from social media companies and online platforms.*
244. *We further recommend that there should be a mechanism for independently handling requests from children for social media companies to take down content. This might take the form of an Ombudsman, as suggested by the Children’s Commissioner, or a commitment from industry to build and fund an arbitration service for young people.*
245. *We call on the Government to give an undertaking that, irrespective of its membership of the EU, the UK should maintain legislation which incorporates the standards set by the General Data Protection Regulation in respect of children, including the right to be forgotten, as a minimum.*

Filtering

246. Businesses which provide internet access services, such as Internet Service Providers (ISPs), can play a key role in providing filtering systems which block websites containing inappropriate content for children. Such systems can apply, for example, to the whole network of a household.
247. The BBFC has made an arrangement with the UK’s largest four Mobile Networks Operators (EE, O2, Three and Vodafone) to act as an independent regulator of content. The BBFC explained “Using the standards in the BBFC’s Classification Guidelines, content that would be age rated-18 or R18 by the BBFC, is placed behind access controls and internet. In 2015, the BBFC and EE also adopted a Classification Framework for EE’s “Strict” parental setting, aimed at younger children, with filtering standards set at the BBFC’s PG level.”²⁵²
248. In 2013 the Government made arrangements with the four largest ISPs (BT, Virgin Media, TalkTalk and Sky) to present customers with an “unavoidable choice” to make as to whether they wanted family-friendly filters. This was done on a self-regulatory basis.²⁵³ The four ISPs cover 90 per cent of the broadband market.²⁵⁴

252 Written evidence from BBFC ([CHI0025](#)), ([CHI0064](#))

253 Ofcom Report on Internet Safety Measures, Strategies of parental protection for children online, (16 December 2015), Executive Summary, pages 3-5: <http://stakeholders.ofcom.org.uk/internet/internet-safety-dec-2015>

254 Written evidence from the Department for Culture, Media and Sport ([CHI0055](#)), ([CHI0067](#))

249. However, John Carr argued that this does not go far enough, as there remains 10 per cent not covered by the undertaking to present filter options.²⁵⁵ Furthermore, while all four of the largest ISPs require an ‘active choice’ to be made, only Sky has the setting on by default.
250. Virgin argued against ‘default on’ settings, on the grounds that the user experience is improved if they take an active role in deciding the settings. However, in a discussion on the merits and disadvantages of opt-in systems, Dr David Halpern, a behavioural expert, told the House of Lords Committee on Trade Union Political Funds and Political Party Funding that there is evidence that people have “a very strong tendency to stick with whatever the default had been set at”.²⁵⁶
251. Evidence shows that the usage of Sky’s filter systems is far higher than that of the other ISPs, as would be expected with a default on system. Customers are free to switch the filters off, but there a significant number who do not actively choose to.²⁵⁷
252. Children use multiple devices to access digital services and can connect from their home network, school, friends’ houses, or by using public Wi-Fi and mobile networks. According to the BBC, “These can all have different levels of filtering and present challenges to parents who want to try to control their child’s use of the internet.” Encryption of websites and the use of apps also limit the effectiveness of filters.²⁵⁸
253. Parent Zone was concerned by the risk that filtering might result in children “moving to encrypted services and less savoury parts of the web in attempts to bypass adult restrictions. We also need to ensure that in tackling the familiar risks and services, we are not ignoring new and emerging ones.”²⁵⁹
254. A large number of witnesses identified the need to teach digital literacy and parental mediation, rather than relying on filters alone. Virgin told us, “Supportive and enabling parenting does more to foster resilience than parents who restrict or monitor internet use. In fact, the research indicated that restricting internet access can have a deleterious effect on building resilience.”²⁶⁰
255. Professor Phippen cautioned: “In our rush to ensure children are “safe” online, we risk a dystopia where the young have limited access to relevant and valuable information (for example, sexual health, relationships advice, information about gender and sexuality), increasing erosion of the privacy, and a failure to meet their rights to an education that is fit for purpose and one they are calling for.”²⁶¹
256. Wendy Grossman agreed, noting that “The Open Rights Group’s Blocked project²⁶² has found that at least 19% of the top 100,000 sites as determined by Alexa are blocked on at least one network in the UK.”²⁶³

255 [Q 8](#) (John Carr)

256 Select Committee on Trade Union Political Funds and Political Party Funding, [Report](#) (Report of Session 2015–16, HL Paper 106), page 18

257 [Q 66](#) (Adam Kinsley) and [Q 81](#) (Tony Close)

258 Written evidence from BBFC ([CHI0025](#)), ([CHI0064](#))

259 Written evidence from Parent Zone ([CHI0011](#))

260 Written evidence from Virgin Media ([CHI0052](#)) ([CHI0059](#))

261 Written evidence from Professor Andy Phippen ([CHI0045](#))

262 Open Rights Group, *Blocked*: <http://www.blocked.org.uk> [accessed 13 March 2017]

263 Written evidence from Wendy Grossman ([CHI0046](#))

257. According to David Miles:

“Youth charities and advocates for freedom of expression were rightly worried about the impact of these new filters on online support services and resources. Vitaly important to young people, there was a real danger that teenagers in particular, in seeking online confidential advice through web sites, would be blocked. The risks of over-blocking or under-blocking legitimate web sites could have significant consequences. The online gaming community, LGBT and sexual health charities felt particularly vulnerable.”²⁶⁴

258. *We recommend that all ISPs and mobile network operators should be required not only to offer child-friendly content control filters, but also for those filters to be ‘on’ by default for all customers. Adult customers should be able to switch off such filters.*

259. *Those responsible for providing filtering and blocking services need to be transparent about which sites they block and why, and be open to complaints from websites to review their decisions within an agreed timeframe. Filter systems should be designed to an agreed minimum standard.*

Age verification and the Digital Economy Bill

260. There is a widespread flouting of rules concerning age, for example on social media sites and gaming.²⁶⁵ Barnardo’s suggests, “There is potentially scope for credit cards or similar to offer some form of age-verification.” However, they argue that that this would be excessive for social media sites, and “given young people’s desire to socialise online may even drive them towards shadier sites with less moderation than platforms such as Facebook.”²⁶⁶

261. On the other hand, Barnardo’s accepted that more rigorous age-verification processes would be appropriate in the case of online pornography. The Government has sought to implement such a policy through the Digital Economy Bill, a wide-ranging bill which was going through Parliament at the time of our inquiry. During its passage many argued that it was a narrow provision since it dealt only with pornography but let extreme violence, user-generated adult material, self-harm and anorexia sites all untouched.²⁶⁷ It was also suggested that social media sites that host user-generated pornographic content should be included in the scope of the Bill.²⁶⁸

262. All of our witnesses supported the principle of the age verification provisions (at least as initially drafted) in the Bill. However, some have criticised the proposed mechanism for penalising websites which do not comply with specified age verification requirements. Virgin Media cautioned:

“The decision to include ISPs within the scope of the Bill and to compel ISPs to site block on notification from the BBFC is without precedent, and carries risks ... It is therefore imperative that in bringing forward

264 Written evidence from David Miles Consulting ([CHI0012](#))

265 See, for example, [Q 117](#) (Simon Milner) and written evidence from South West Grid for Learning ([CHI0009](#))

266 Written evidence from Barnardo’s ([CHI0013](#))

267 For example, HL Deb, 13 December 2016, [col 1163](#).

268 HL Deb, 13 December 2016, [col 1155](#)

this legislation the Government is alert to the need for robust checks and balances.”²⁶⁹

Virgin Media also called for greater oversight of the age verification regulator.

263. The Bill has also been criticised by the Delegated Powers and Regulatory Reform Committee and the Constitution Committee on the grounds that it gives too much power to the regulator to determine key terms, such as “ancillary service providers”—that is, internet sites which enable or facilitate the access to pornographic material—and “guidelines” according to which the regulator will exercise its powers, and because insufficient detail is provided on the face of the Bill to allow Parliament to conduct effective scrutiny.
264. The Bill continues its progress through Parliament as we publish.
265. ***We support the age verification provision of the Digital Economy Bill. We hope that the Government will provide greater clarity about the powers of the regulator, and will include social media companies within the definition of ‘ancillary service providers’.***

Child-friendly design

266. The technical solutions that we have considered so far concern preventing children from viewing unsuitable content. According to Dr Victoria Nash, of the Oxford Internet Institute, in recent years such measures have been the focus of policy debate with large tech companies expected to act as “sheriffs” in limiting content for children. She deprecated this focus which “risks obscuring the wider array of commercial actors whose products and services may pose risks to minors ... It would be desirable therefore to widen the focus on the full range of commercial actors providing digital goods and services for children.” She also called for “data and privacy risks, as well as the more familiar content-based risks” to be addressed.²⁷⁰
267. Adam Kinsley of Sky agreed: “There is only so much that an internet access provider can do but, if you are talking about the end content applications, I think it is down to those companies—and it is often the big brands which are doing this—to do the right thing and build in the safety by design. If they stuck to the 5Rights principles,²⁷¹ they would get there.”²⁷²
268. Baroness Shields told the Committee that safety by design, “was a concept that started to emerge in services where kids spent a considerable amount of time and there was concern that they would be exposed. Initially, that concern was primarily about grooming for sexual exploitation, but it became about exposure to all kinds of harms and criminals.”²⁷³
269. However, many of our witnesses highlighted that internet services are not designed with children in mind. For example, Mary McHale, a teacher, argued that insufficient account of children’s need for privacy and data protection was taken in the design of digital products. For example, when an operating system is updated, default settings are restored automatically:

269 Supplementary written evidence from Virgin Media ([CHI0059](#))

270 Written evidence from Dr Victoria Nash, Oxford Internet Institute ([CHI0021](#))

271 The 5 rights principles are The Right to Remove, Know, Safety and Support, Informed and Conscious Use and Digital Literacy.

272 [Q 67](#) (Adam Kinsley)

273 [Q 133](#) (Baroness Shields OBE)

“We tell the students that their geolocations go on every time they have an update on the Apple phone devices, which a lot of students tend to have these days, and that it turns the geotagging or the geolocations back on. Therefore, every time a student takes a picture and posts it, you can actually find out the location of that. We have to keep saying to the students, “You must turn it off all the time”. We say that to our parents too.”²⁷⁴

270. Alice Webb told the Committee “One of the things that is hugely important in the digital space is about there being transparency about who is funding what, how things are paid for: are you advertising; do you have product placement?”²⁷⁵

271. The CMF recommended that there should be “Rules against behavioural mechanics that try to draw children into addictive behaviours or exhortation.”²⁷⁶

272. Horizon told us, “Youth Juries participants also pointed out that removing personal online content should be easier and suggested a self-tracking tool to gain control over their own content, as well as screenshot blocking tools.”²⁷⁷

273. ICO recommended that:

“Social networking sites should explain their data collection practices in language that all users of their services are likely to understand and to invest in a high standard of security for all users. This should also include privacy settings by default (e.g. publication of data).”²⁷⁸

274. Better design can also promote children’s wellbeing in internet use for example by discouraging habitual behaviours and enabling children to switch off. Dr Bush suggested it would “not be a big step to create your own rewards, or to have your own time limit built into a game. Could an app go on that said, “The half-hour is up. Why not reward yourself by walking round the garden or ringing a friend you have been putting off?” Young people could put their own rewards into those things. Young people have told us that they would really welcome that.”²⁷⁹

275. Dr Rudkin called for the “people who are creating these apps, websites and forums [to] be aware of child development informational research so that they know exactly what kinds of things are going on for kids who are going to be accessing this information, whether they are adolescents, three year-olds or seven year-olds, and to have some very clear classification for parents who are introducing their children to these different sites.”²⁸⁰

276. Dr Fossi stressed:

“Putting children at the forefront and putting their needs at the front, centre and heart of the designs in the online world would help us to develop a better internet for children. I am looking at tech developers

274 [Q 54](#) (Mary McHale)

275 [Q 74](#) (Alice Webb)

276 Written evidence from Children’s Media Foundation ([CHI0027](#))

277 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#))

278 Written evidence from the Information Commissioner’s Office ([CHI0049](#))

279 [Q 103](#) (Dr Marc Bush)

280 [Q 14](#) (Dr Angharad Rudkin)

and engineers, as well as at corporations, industry, schools, and parents and grandparents.”²⁸¹

277. The NSPCC recommended that “Platforms that attract both adults and children should distinguish between their audiences by verifying the user’s age and providing specific features to under-18s:

- Default-on privacy settings for children so that their profiles are not searchable and they cannot be contacted by strangers.
- Alerts to young people whenever they are communicating with an adult.
- The option to install parental controls to help protect young people from viewing harmful content.
- Age-checking to distinguish between children of different ages so that tailored, age-appropriate protection can be applied. This should be based upon an impact assessment into the neurological and developmental impact of services upon children of variable ages.”²⁸²

278. The Government told the Committee that “The UKCCIS guide ‘*Child Safety Online. A Practical Guide for Providers of Social Media and Interactive Services*’ includes examples of current good practice for services targeted at and attracting users who are under 18 years old. It describes for industry how different social media, interactive services and child safety charities are currently dealing with key challenges.”²⁸³ We note, however, that UKCCIS have no system for monitoring uptake or evaluating improvement.

279. BT said that the guidelines had “examples of good practice from leading technology companies, and advice from NGOs and other online child safety experts. Its purpose is to encourage businesses to think about “*safety by design*” to help make their platforms safer for children and young people under 18.”²⁸⁴ Ofcom confirmed this: “To accompany the (UKCCIS) guide the working group is supporting a 12 month outreach plan targeted at smaller and start-up social media companies to promote a culture in the online content industry of “*safety by design*”.”²⁸⁵

280. Facebook gave the Committee examples of where it already employs a number of child-friendly features for users who have identified themselves as being under 18:

- Such users cannot see commercial content for age-related products such as alcohol, gambling or dating services.
- It is not possible to search young people by the name of their school.
- Where Facebook judges that an individual piece of content reported to it might be disturbing for a young person but not in breach of their community standards, for example distressing news footage, it will ‘age gate’ the content meaning that no-one under 18 will be able to see it.”²⁸⁶

281 Q 20 (Dr Julia Fossi)

282 Written evidence from the NSPCC (CHI0014)

283 Written evidence from the Department for Culture, Media and Sport (CHI0055), (CHI0067)

284 Written evidence from BT (CHI0020)

285 Written evidence from Ofcom (CHI0051), (CHI0060)

286 Written evidence from Facebook (CHI0044)

281. However we did not receive detailed evidence of the extent to which the social media companies are using the guide in relation to their services. And many witnesses wanted to see a much broader set of standards that include respect for privacy and design for wellbeing.
282. By contrast it seemed that there have been some advances in online content aimed at young children, from major corporate companies like Sky (Sky Kids) and Google (YouTube Kids) to smaller start-ups like Azoomee. These products demonstrate the demand for ring-fenced services for children that allow them to have an age appropriate internet experience.
283. The toy manufacturer Lego launched a social network in February 2017 aimed at the under-13s which they believe will be a “safe” social network. It lets children post photos of their Lego creations but does not allow text comments apart from pre-written responses. There is no personal information requested and no tracking enabled.²⁸⁷
284. Alice Webb of the BBC referenced Playtime Storytime and Playtime Island which are specific apps for the BBC’s youngest audience. She said the reasons for developing them were “they are all touch screen and allow children to interact and play, so it gives us that opportunity. It also allows us to create standalone playgrounds, online playgrounds for children that they can go and play in and enjoy those things in.”²⁸⁸
285. She told the Committee that the BBC had developed iPlayer Kids to be an:
- “environment that was child-centric, so our absolute focus was making sure that our design was child-centric ... to give them an environment that was just for them, which they could feel at home in, to help them get content that way, and it has further safeguards against them wandering off into content that is not necessarily age appropriate.”²⁸⁹
286. The BBC told us that “digital products or content are often not user tested with a young audience, due to the complexity of reaching the broad range of ages with different abilities.”²⁹⁰
287. However, Adam Kinsley told us that children were at the heart of the design of the Sky Kids app:
- “In the way we went through the design process, it was almost built by children, going through constant design refreshes with panels of children, which is just great to watch, seeing them trying to break the thing, and giving them something which they can really use and love.”
- He concluded that “this has to be built into applications by responsible businesses by design” and that in order to achieve this Sky worked with 5Rights and was “driven by its principles to deliver a product specifically tailored for children.”²⁹¹

287 BBC ,‘Lego launches ‘safe’ social network for under-13s’ (31 January 2017): <http://www.bbc.co.uk/newsbeat/article/38806540/lego-launches-safe-social-network-for-under-13s> [accessed 2 March 2017]

288 Q 74 (Alice Webb)

289 Q 74 (Alice Webb)

290 Written evidence from the BBC (CHI0053)

291 Written evidence from Sky (CHI0038)

288. While some companies and content providers have championed child-specific services, ICO was “sceptical about seeing an approach that seeks to differentiate between children’s and adults’ sites as being in itself a solution to the problem of children’s online protection.”
289. Alice Webb of the BBC argued that child-friendly design “is something that people will be demanding of commercial services, as these subjects are discussed more widely and there is greater awareness in the public about them.”²⁹²
290. The NSPCC recommended that “Minimum standards and best practice guidance must be established in these areas so ... they can check that they are providing the requisite safety features to enable young people to participate in a safe environment.”²⁹³
291. The establishment of such standards is all the more pressing in the light of the projected growth of the Internet of Things (IoT), Artificial Intelligence (AI) and Machine Learning in the coming years. Yet IoT has already been deemed to pose a risk for cybersecurity and privacy. As Horizon told the Committee:
- “Far too often security and privacy concerns are given too low a priority in the design process, resulting in easily hackable IoT devices. Particularly concerning are the examples, including connected baby monitors, voice controlled TVs and toy dolls (e.g. Hello Barbie), that continuously stream very personal video and audio information to data centres, often outside of the jurisdiction of the UK (and EU) data controllers.”²⁹⁴
292. Barnardo’s highlighted the issue that “most of the current literature by futurologists anticipating the effects of technological advance is not written with a specific narrative about the potential impact on children in mind.” It cited a study called *Youth and the Internet* which suggested “experts in the tech and children’s sectors should be brought together more regularly to conduct ‘Child Impact Assessments’ on tech developments perhaps similar to the way current policies across Government are already subject to Equality Impact Assessments.”²⁹⁵
293. BT recommended that “standards or best practice guidelines should be set as technology develops, especially with respect to children. Lack of reference to clear guidance and the fact that human rights impact assessments are not yet commonplace for new products and propositions are risks for businesses to mitigate. The civil society organisations Unicef and 5Rights are attempting to address this in the identification of online rights of children and young people.”²⁹⁶
294. Dr Fossi agreed: “Building on self-regulatory principles, and ensuring that children and child protection are the heart of the designs in the online space. Having a code of practice and minimum standards would go an enormous way towards ensuring safety and providing age-appropriate filtered experiences for children and young people in the online world.”²⁹⁷ She also

292 [Q 75](#) (Alice Webb)

293 Written evidence from the NSPCC ([CHI0014](#))

294 Written evidence from Horizon Digital Economy Research, University of Nottingham ([CHI0032](#))

295 Written evidence from Barnardo’s ([CHI0013](#))

296 Written evidence from BT ([CHI0020](#))

297 [Q 27](#) (Dr Julia Fossi)

recommended that such a code of practice and minimum standards should be incorporated into university courses.

295. The NSPCC recommended that an “independent regulator, as proposed within the Digital Economy Bill, should be endowed with the power to set minimum standards of child safeguarding across all social networks, platforms and ISPs to ensure that child safeguarding is incorporated into the design, content and functionality of all online services.”²⁹⁸
296. The BBC told the Committee, “Clear guidelines and rules regarding design and content that apply beyond content explicitly aimed at children could help open up wider ranges of content to younger audiences.”²⁹⁹
297. The 5Rights framework agrees and states:
- “There is no technological impediment to delivering children’s rights online - it is a choice. To support the presence of young people online, we must design and implement as standard, into every interaction of the digital world ALL the rights they enjoy offline.”³⁰⁰
298. **We welcome the development of internet services which are specifically designed for very young children but regret that there are no such services for children as they grow older. We have found that there is resistance to providing services which incorporate the support and respect for rights that would enable a better internet experience for all children as they explore the wider internet.**
299. *We recommend that the Government should establish minimum standards of design in the best interests of the child for internet products. For the avoidance of doubt this is for all products that might reasonably be expected to attract a large proportion of children, not only those designed with children in mind.*
300. *The minimum standards should require that the strictest privacy settings should be ‘on’ by default, geolocation should be switched off until activated, and privacy and geolocation settings must not change during either manual or automatic system upgrades.*
301. *Minimum standards should incorporate the child’s best interests as a primary consideration, and in doing so require companies to forgo some of their current design norms to meet the needs of children.*
302. *All platforms and businesses operating online must explain their data collection practices, and other terms and conditions, in a form and language that children are likely to understand. Their explanations should not try to obfuscate the nature of the agreement.*
303. *All platforms and businesses operating online must not seek to commercially benefit or exploit value from the sharing or transfer of data gained from a child’s activities online, including data transferred between services that are owned by the same parent company. They should uphold a principle of minimum data gathering necessary for the delivery of a service when the end user is a child.*

298 Written evidence from the NSPCC ([CHI0014](#))

299 Written evidence from the BBC ([CHI0053](#))

300 5 Rights, <http://5rightsframework.com/> [accessed 24 January 2017]

304. *All platforms and businesses operating online which large numbers of children use should incorporate a ‘time out’ function into their design even if it is not in their best commercial interests. It is the view of the Committee that the wellbeing of the child is of paramount importance, and in our view there is sufficient evidence that time-outs or breaks contribute positively to the mental health and wellbeing of children.*

Providing resources to improve digital literacy

305. Many of our witnesses pointed out that whilst companies have a duty to support children by technological means children themselves need to grow up digitally literate. As we have seen, the largest companies already contribute to this through sponsoring Internet Matters, which acts as hub of information and resources. BT and Samsung also gave us evidence of their initiatives to educate children about technology and digital literacy.
306. Members of the Committee visited a school in Brixton where an online safety assembly was presented by Google in partnership with Parent Zone (see Appendix 7). We found the assembly to be a powerful learning tool but it was notable that it would only be produced at a small number of schools, and it was not clear that a similar standard message was being delivered at other schools.
307. We heard from a number of charities that the gap in provision for children, particularly on the digital literacy and resilience agenda, had been tackled by the third sector and industry. We found that this too was piecemeal and fragmented.
308. The NSPCC has developed a website, Net Aware, “where parents can find information about the top 50 sites that young people have told us they use ... based on evidence collected from 1700 children and 500 parents about their experiences on the most popular platforms”.³⁰¹

Schools

Computer science and PSHE

309. We recognise that education is a devolved issue and therefore our analysis and recommendations in this section apply to England but we feel that this is more widely applicable. The Government told us that it had “introduced the new computer science curriculum, which includes topics such as online safety and security, providing the computational thinking skills which will enable young people to adapt to emerging technologies.”³⁰²
310. On the other hand, a large number of witnesses said that computer science lessons did not go far enough in teaching digital literacy.
311. The Committee heard from teachers that computer science including e-safety was taught to students from year 7. Karl Hopwood recognised that when e-safety began in schools, it “sat in the lap of the IT department—I understand why—but for a lot of people it made them think it is a technical issue rather than a behavioural challenge.” However both he and Mary McHale agreed that setting e-safety within the PSHE framework could be beneficial. Mr

301 Written evidence from the NSPCC ([CHI0014](#))

302 Written evidence from the Department for Culture, Media and Sport ([CHI0055](#)), ([CHI0067](#))

Hopwood said this was “because ... safety pervades everything that young people are doing.”³⁰³

312. In addition to computer science standing at the heart of the curriculum there remains an urgent need to consider the social and sexual aspects of digital use. Witnesses were almost universal in recommending the implementation of a much broader, better resourced PSHE programme taught by trained teachers. PSHE education is defined by the schools inspectorate Ofsted as a planned programme to help children and young people develop fully as individuals and as members of families and social and economic communities. Its goal is to equip young people with the knowledge, understanding, attitudes and practical skills to live healthily, safely, productively and responsibly.
313. The PSHE Association told the Committee
- “Worryingly, PSHE education lessons, through which these issues are taught, is increasingly being squeezed off school timetables. This means that many pupils miss out on education which could help to keep them safe online. The most recent Ofsted review of the subject has stated it is ‘not good enough’, pointing to the serious safeguarding implications of failure to teach many of these issues, while the Commons Education Committee says the situation is “deteriorating”. The National Council of Women said “the non-statutory status of much of PSHE education means that some schools are not prioritising the subject and not allocating sufficient curriculum time to it. Some schools are not delivering it at all.”³⁰⁴
314. The Children’s Commissioner told us that participants of their survey into online pornography called for “more education about pornography delivered in a relevant and engaging way. Young people wanted to be able to find out about sex, relationships and pornography in ways that were safe and credible.”³⁰⁵
315. The Government has announced that relationships and education (RSE) would be compulsory in all schools and laid open the possibility that PSHE could be too.³⁰⁶
316. The benefits of PSHE go beyond sex and relationship education. Dr Sarah Marsden advocated “developing young people’s critical thinking and political consumption skills and their digital literacy so that they are better able to assess and interpret the content they find online”.³⁰⁷ With regard to online radicalisation, Dr Akil Awan told us that better education of digital citizenship and media literacy could also help counteract the negative influence of extremist content.³⁰⁸
317. ***We agree with the Digital Skills Committee that no child should leave school without an adequate standard of digital literacy. It is the view of this Committee that digital literacy should be the fourth pillar of a***

303 [Q 58](#) (Karl Hopwood)

304 Written evidence from the PSHE Association ([CHI0005](#))

305 Written evidence from the Children’s Commissioner ([CHI0028](#))

306 Department for Education, *Schools to teach 21st century relationships and sex education* (1 March 2017): <https://www.gov.uk/government/news/schools-to-teach-21st-century-relationships-and-sex-education> [accessed 13 March 2017]

307 [Q 125](#) (Dr Sarah Marsden)

308 [Q 125](#) (Dr Akil Awan)

child's education alongside reading, writing and mathematics, and be resourced and taught accordingly.

318. *We recommend that the Government should make PSHE a statutory subject, inspected by Ofsted. The Committee further recommends that PSHE be mandatory in all schools whatever their status. The PSHE curriculum must be designed to look broadly at the issues young people are concerned about online, including compulsive use, data gathering, body image—rather than the current e-safety agenda of risk. Children need support in developing their critical thinking and understanding the veracity of online information. This should form part of the curriculum. We also note Ofcom's duty under the Communications Act 2003 to promote media literacy.*
319. *It is the Government's responsibility to reassess the resources needed to deliver computer science and PSHE in all UK schools and to ensure that teachers are adequately trained and resourced. But we note with interest that graduates currently entering teacher training are the first group of teachers who might be considered 'digital natives'. We recommend that the Government harness and further upgrade the skills of this new generation in the course of teacher training so that UK schools are at the forefront of the digital revolution.*
320. **We commend the work of the voluntary sector and industry in delivering information and resources about online safety and digital literacy for parents and children, but note that it is currently fragmented and insufficient to meet the needs of all children. Once a truly rounded computer science education and fully resourced Personal, Social Health and Economic education is established in schools, we believe that there will be a clearer role for the voluntary sector and industry.**

Schools' duty of care

321. Schools have a legal duty of care to protect children and staff from harm, and this duty extends to harm from electronic communications.³⁰⁹ But we heard that many are struggling to do so.
322. SWGfL, a non-profit organisation, published a report which showed that: "40% of primary schools only had a basic filtering system in place and 6% had none at all. It also highlighted that 55% of school governors and 50% of staff had received no online safety training. Policies around technology were also poor with 35% of primary schools having no policies around mobile phones."³¹⁰
323. The NSPCC recommended:
- "Teachers need to have concrete risk assessments so as to be able to spot signs of online abuse, escalate and report cases appropriately and know how to signpost and support each child taking into consideration the additional impacts that online abuse has on the child."³¹¹

309 Written evidence from South West Grid for Learning ([CHI0009](#))

310 Written evidence from South West Grid for Learning ([CHI0009](#))

311 Written evidence from NSPCC ([CHI0014](#))

324. The Department for Education has published statutory guidance, which recommends filtering and “appropriate monitoring”.³¹² However, it does not define what this means.
325. In oral evidence, Mark Donkersley, the Managing Director of e-Safe, explained that he provided an early warning system for safeguarding risk, which monitored any school devices or devices using the school network. This could detect images and video, in an attempt to find pornography. It also references against a list of “literally tens of thousands of terms, phrases, euphemisms, slang, in multiple languages associated with a range of behaviours”, to identify inappropriate content or harmful behaviour. If it has a match, a screenshot of the material is sent to a team of “multilingual behaviour specialists”, who review it. Depending upon how serious they deem it to be the school is notified immediately or as part of a weekly or monthly report. It is then for the school to deal with the matter.³¹³
326. Mr Donkersley told us that his monitoring went beyond detecting inappropriate content. It could detect speech related to “paedophile grooming, child abuse, FGM, bullying, self-harm risk and so on and so forth.” The system could also detect “depression indicators”, which could be “either cries for help or low-level things going a bit awry at home”.³¹⁴
327. DefendDigitalme was highly critical of Department for Education data policy and practice, especially in regard to what it viewed as “statutory web surveillance, [which will] affect children across all State education, age 2-19 in England.” According to DefendDigitalme this and other policy changes were “characterised by lack of transparent due diligence, public engagement, or democratic debate before imposing significant policy with far reaching potential, and that encroach on children’s rights.”³¹⁵
328. With regard to e-Safe Systems, Mr Donkersley explained that schools are responsible for developing and managing a system for children or parents to consent to the monitoring system, but students, parents and staff sign a consent form which includes terms of use for electronic equipment.
329. Mr Donkersley told us that his system had detected “some horrible situations”, and as a result “We have managed to alert somebody to intervene and protect, help and support an individual”.³¹⁶ He also explained that his system was limited to school devices or personal devices used in the school environment, and furthermore that information about children was anonymised and encrypted. Nonetheless, we are concerned by a system that allows any personal thought, which is typed out, potentially to be scrutinised in such a way.
330. In order for schools to undertake the responsibilities that we have outlined above, they need to allocate sufficient time, resources and personnel to meet the task.
331. ***The Government should ensure that schools are sufficiently resourced and directed to meet their obligations of child protection, including the ability to train their teachers and to develop digital***

312 [Q 131](#) (Edward Timpson MP)

313 [Q 37](#) (Mark Donkersley)

314 [Q 37](#) (Mark Donkersley)

315 Written evidence from defenddigitalme ([CHI0042](#))

316 [Q 43](#) (Mark Donkersley)

policies which are right for them and to discern what sort of filtering and monitoring systems are appropriate, together with pastoral care, education and supporting parents.

332. *We caution that internet safety systems should not undermine children’s rights to privacy, to learn about the world and to express themselves. The Government should require schools to obtain the informed consent of parents and students, and they should have the opportunity to opt out.*

Children as users

333. Dr Bush emphasised that children are fundamentally “active” users of the internet: “When we talk about the internet, sometimes we assume that children and young people can be protected from everything, yet frequently they are the people creating as well as using that content.”³¹⁷
334. It is therefore also children’s responsibility to practise self-governance but they have to be supported by “community guidelines with clear ground rules of what is and is not acceptable, including hateful content, nudity or sexual content, and online harassment and bullying.”³¹⁸
335. Dr Bush explained ways that children’s responsibility for one another can go beyond self-restraint. Peers can provide positive role models for one another and be a source of information to encourage digital literacy.
336. The Committee was struck by the repeated calls for research, particularly qualitative research with young people. Dr Dickon Bevington called on mental health professionals to ask child patients about their internet use. Dame Sue Bailey, chair of the Children and Young People’s Mental Health Coalition, described mental health services as a:
- “Car crash waiting to happen ... if we want a sustainable society that can help young people support themselves. We need to listen to them more about what their problems are, with all the risks that surround them, such as all [those] that come out of social media.”³¹⁹
337. FOSI also argued that Government funding should be provided for research into the social aspects of the internet, “online behaviours and educational efforts that promote digital literacy and parental engagement”³²⁰.
338. *Children are often first to encounter problems online because they are digitally active, but often not consulted about the nature of those problems. We recommend that the Government should commission research based on in depth consultation with children. We note that because of the rapid nature of technological change public policy may on occasion have to anticipate the conclusion of long-term research. Such research should include:*
- *the relationship between age and vulnerability, taking account of the differences of ethnic and socioeconomic backgrounds;*

317 Q 89 (Dr Marc Bush)

318 Written evidence from TechUK (CHI0047)

319 ‘Act on children’s mental ill health or risk national crisis, warns expert’, *The Guardian* (1 October 2016): <https://www.theguardian.com/society/2016/oct/01/fund-nhs-child-mental-health-services-to-avoid-crisis> [accessed 24 January 2017]

320 Written evidence from the Family Online Safety Institute (CHI0033)

- *the impact of screen time on social and cognitive development;*
- *the effect of watching online pornography upon children's attitudes and sexual development.*

Self-regulation

339. There is no comprehensive system of regulation of the internet in the UK.³²¹ Instead in the UK businesses operate under a system whereby they are expected to develop and employ good practice and self-governance. In specific areas where regulation exists, for example in respect of advertising inappropriate content in video on demand, a system of 'co-regulation' has developed whereby businesses work in partnership with regulators such as Ofcom to develop and enforce a system of good practice. BT explained the advantages of the UK's current approach:

"We believe that the multi-stakeholder self- and co-regulatory approach has made the UK a world leader in online child protection. It has allowed children to experience and reap the benefits of the internet whilst improving online safety via technical tools and providing the education, awareness and skills to allow children, parents and teachers to manage and avoid risks."³²²

340. The Government agreed:

"Self-regulation also allows a broad range of interested parties to participate and can be an effective way of coming up with innovative and effective solutions to issues which, due to the nature of the internet, are often global."³²³

341. However, John Carr of CCCIS argued that the current regulatory regime is not adequate in the face of fast-changing innovation.

"I think we should try to establish, either through law or culturally, that any and every company has a duty of care to children if it brings out a new product or a new service, just as it does in the physical world. If you bring out a new iron, a new toaster, a new motor car or a new anything, there is a whole set of hoops that you have to go through to prove that it is fit and proper to be put in the marketplace in which you are about to put it ... That idea of establishing a duty of care would be a very big step."³²⁴

342. Parent Zone agreed:

"It is rather like some playgrounds having play equipment that children routinely fall off. It is unfeasible in the offline world that such a playground would be allowed to continue without some warning information for parents.

343. Parent Zone went on to argue for specific changes to increase child protection:

"It is time for the Children's Act and Working Together to Safeguard Children guidance to be reviewed to consider whether a legal duty

321 Written evidence from the Children's Media Foundation ([CHI0027](#))

322 Written evidence from BT ([CHI0020](#))

323 Written evidence from the Department for Culture, Media and Sport ([CHI0055](#))

324 [Q 8](#) (John Carr)

of care could be included to ensure that services that identify a child experiencing harm are required to report that child to the appropriate authority. Online services have a unique window into children's lives. It cannot be right that they are allowed to look through that window, observe a child experiencing harm and have no legal duty to do anything with that information.”³²⁵

344. Wendy Grossman, on the other hand, was highly critical of this notion of a duty of care:

“Successive British Prime Ministers have sought to make Britain “the best place in the world for ecommerce”. Requiring advance permission for all such experiments, Carr’s idea here, would effectively void that long-held policy ... I think policy makers would struggle to define such a “duty of care” for services and technologies that are still in the research phase.”³²⁶

345. Many witnesses argued that it is simply not possible for legislation to account for all possible future changes. Sky noted, “For legislation to be truly effective, it needs to be developed so that it can be applied and enforced globally. This is clearly a significant challenge ... Care needs to be taken to avoid focusing on in-country operators subject to local regulation, but to ensure that the largest and most popular global platforms are part of any response.”³²⁷

346. Indeed, SWGfL, a non-profit organisation, were concerned that unilateral legislation on the part of the UK may cause internationally based companies to withdraw “both from UK geographical locations and from agreements shown above, returning to foreign territory and therefore not engaging as they currently do.”³²⁸

347. Dr Nash and Dr Slavtcheva-Petovska argued that any legislative burdens placed upon companies should be proportionate, particularly in the light of evidence to establish causal links “that translate particular risks into harms for specific children.” In the view of Dr Nash, “Policy intervention may still be justified in this area, however any resultant interventions should be understood as ‘precautionary’ only, implying a particular responsibility to ensure proportionality, frequent review of policy efficacy as well as reconsideration if new evidence emerges.”

348. However, YouthLink Scotland wrote, “An agile mind set is required in order to future proof legislation. Rather than referring to specific platforms or sites, legislation should focus on the common elements and principles.”³²⁹

349. It further recommended that “Child’s Rights Impact Assessments are carried out on future legislation in order to ensure that children and young people will not be adversely affected. This is in line with the recent UN Convention on the Rights of the Child Concluding Observation 9a.”³³⁰

350. The law firm Schillings undertook a review of existing English law to see whether the 5Rights Framework was adequately reflected in it. It

325 Written evidence from Parent Zone ([CHI0011](#))

326 Written evidence from Wendy Grossman ([CHI0046](#))

327 Written evidence from Sky ([CHI0038](#))

328 Written evidence from South West Grid for Learning ([CHI0009](#))

329 Written evidence from YouthLink Scotland ([CHI0006](#))

330 Written evidence from YouthLink Scotland ([CHI0006](#))

concluded that while the laws are “broadly and theoretically sufficient to provide protection for children’s rights online, the key issue is that the laws are routinely ignored”. The author suggests that there is a lack of will and resources directed at applying rights on behalf of children online.³³¹

351. The Children’s Media Foundation argued that “UK regulators need to have ‘teeth’ to ensure that regulation can be enforced”, while conceding that it is important not to stifle innovation. In its view, “the status quo which is based on self-regulation is not adequate to ensure”³³² that an ethos of mutual trust between the digital sector and parents is maintained.
352. **We find that the current regime of self-regulation is underperforming and believe it will take a step change from the highest level of the Government to represent the needs of children online.**
353. *Any future policy should be based on principles which firmly place children’s rights, wellbeing and needs as the preeminent considerations at all points of the internet value chain where the end user is a child. This shared responsibility requires all stakeholders to play their part, and all parties to sustain their commitment to children’s wellbeing in what is a rapidly changing landscape that will include on the near horizon the Internet of Things and Artificial Intelligence.*

The Government

354. In its report, the House of Lords Digital Skills Committee concluded that “the Government should act as the ‘conductor of the orchestra’ and play an enabling role” in order to lead the UK through changes brought about by changing technologies.³³³ It also advocated that their efforts should be better coordinated and that it should develop a ‘Digital Agenda’ for the UK, which would include as an objective that “No child leaves the education system without basic numeracy, literacy and digital literacy”.³³⁴
355. According to BT, the current system of self-regulation requires multi-stakeholder collaboration in order to maximise the benefits and minimise the risks of children’s online activity. It recommends that “The Government would be an appropriate convener of academia, civil society and business”.³³⁵
356. Internet Matters further explained how this should work:
- “It is the role of government to set clear direction and strategy that engages all parties and effectively uses the resources that already exist.”³³⁶
357. The NSPCC welcomed the work of the Government to help protect young people online, but noted “Some companies were more committed than others. In a self-regulatory regime, the Government is in a strong position to make decisions about uniform standards, guidance and best practice”.³³⁷

331 Written evidence from Schillings (CHI0024)

332 Written evidence from the Children’s Media Foundation (CHI0027)

333 Select Committee on Digital Skills, *Make or Break: The UK’s Digital Future* (Report of Session 2014–15, HL Paper 111)

334 *Ibid.*

335 Written evidence from BT (CHI0020)

336 Written evidence from Internet Matters (CHI0040)

337 Written evidence from the NSPCC (CHI0014)

358. Three, a mobile network operator, concluded that it should be for Government to “adopt a strategy that empowers the parents, teachers, guardians and children alike - viewing filtering, age verification, and other technological methods as supporting tools for staying safe online, in addition to a critical skillset that prepares children and adults to deal with a wider variety of situations.”³³⁸

359. The Children’s Charities Coalition on Internet Safety emphasised the need for urgency:

“Finding ways to help parents to help their children get the most out of the internet while remaining safe is a major and urgent societal challenge. We cannot blithely assume it is a problem which will solve itself with the passage of time.”³³⁹

It advocated that the matter should be treated as a public health issue.

360. *The Government has a key role in providing an appropriate framework for stakeholders to act in a concerted, joined-up way. It has a particular obligation to comply with the UN Convention on the Rights of the Child to ensure that children’s wellbeing is protected, to promote children’s right to be heard in matters that affect them, and to act in the best interests of the child in all cases.*

361. Our inquiry showed that the subject of ‘Children and the Internet’ covers a number of Government Departments. We interviewed three ministers—Nicola Blackwood from the Department of Health, Edward Timpson from the Department of Education and Baroness Shields, Minister for Internet Safety and Security at the Department for Culture, Media and Sport as well as being a minister in the Home Office. Baroness Shields’ role was altered in December 2016 when she was appointed as the Prime Minister’s Special Representative on Internet Crime and Harms and became solely a Home Office minister. We are concerned that the apportionment of responsibility and accountability is still not clear and we detect a danger of departmental segregation.

362. We note that the Secretary of State for Culture, Media and Sport has announced a new Internet Safety Strategy initiative involving ministers and officials from departments across Government including the Home Office, Department for Education, Department of Health and Ministry of Justice. We recognise the primary intention of this is “preventing children and young people from harm online”.³⁴⁰

363. While we commend this, we are concerned on two fronts. First, we are concerned that the focus of the Government’s policy is primarily danger and risk. We call on the Government to recognise that rights, literacy and education are as important in equipping children with the necessary tools to navigate the online world. Second, we note that there have been meetings and reviews in the past without sufficient progress. We are concerned that the recommendations of this report will not be implemented meaningfully

338 Written evidence from Three (CHI0016)

339 Written evidence from the Children’s Charities’ Coalition on Internet Safety (CHI0001); see also written evidence from Parent Zone (CHI0011).

340 Department of Culture, Media and Sport, ‘Government launches major new drive on internet safety’: <https://www.gov.uk/government/news/government-launches-major-new-drive-on-internet-safety> [accessed 13 March 2017]

in the long term without commitment to agree minimum standards and without a champion to advance them.

364. *We recommend that the Government should establish the post of Children's Digital Champion at the centre of the Government within the Cabinet Office, with a remit to advocate on behalf of children to industry, regulators and at ministerial level across all Government departments.*
365. *The remit of the Children's Digital Champion should include:*
- *establishing and overseeing the implementation of minimum standards of design and practice across the entire internet value chain,*
 - *working with the Department for Education to set the standard of digital literacy and PSHE in all UK schools,*
 - *commissioning research, and*
 - *ensuring existing rights and legislation are implemented in online settings.*
366. *We welcome the Government's promotion of an Internet Safety Strategy and the intention to hold round table meetings with industry leaders. We see this as the opportunity for the Prime Minister to take forward the recommendations of this report culminating in a summit which would establish minimum standards for child-friendly design, filtering, privacy, data collection, terms and conditions of use, and report and response mechanisms for all businesses in the internet value chain, public bodies and the voluntary sector.*
367. *The standards should be set out in a code of conduct, which should also seek to promote digital literacy. If industry fails to implement the recommendations, then the Government should take action. The UK must be an exemplar in raising standards.*
368. *We further recommend that the Government should commission a version of the code of conduct which is written by children for children and that it builds on 'in depth' contributions of young people from existing research.*
369. *We note the NSPCC's suggestion for creating a user generated age rating system. We recommend that the Children's Digital Champion work with others to investigate the potential of such a scheme.*
370. *The Committee feels that the role of the UK Council for Children's Internet Safety in research and convening stakeholders should continue but in order to enhance its effectiveness it should report to the Children's Digital Champion who has the independence from industry and access at a ministerial level. Its remit and membership should be extended to support a broader delivery that includes children's rights, digital literacy, industry codes, as well as safety.*
371. *The Government should also involve further education providers as well as universities and encourage them to incorporate the standards and the code of practice in relevant courses.*

372. *It is the Committee's view that this issue is of such critical importance for our children that the Government, civil society and all those in the internet value chain must work together to improve the opportunities and support where the end user is a child. Ultimately it is for the Government to ensure that this happens. We look forward to its response to this report.*

APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

Members

Lord Allen of Kensington
 Baroness Benjamin
 Lord Best (Chairman)
 Baroness Bonham-Carter of Yarnbury
 Earl of Caithness
 Bishop of Chelmsford
 Lord Gilbert of Panteg
 Lord Hart of Chilton
 Baroness Kidron
 Baroness McIntosh of Hudnall
 Baroness Quin
 Lord Sheikh
 Lord Sherbourne of Didsbury

Declarations of interest

Lord Allen of Kensington
Chairman, Global Radio Group
Owns a share of over £50,000 in ITV plc

Baroness Benjamin
Vice President, Barnado's
Speaks on behalf of the NSPCC
Vice Chair, All-Party group Children, Media and the Arts

Lord Best (Chairman)
No relevant interests declared

Baroness Bonham-Carter of Yarnbury

Earl of Caithness
No relevant interests declared

Bishop of Chelmsford
No relevant interests declared

Lord Gilbert of Panteg
Consultant for Finsbury, a public relations company, which has advised Telefonica UK

Lord Hart of Chilton
Lord Hart did not participate in any proceedings for this inquiry.

Baroness Kidron
Founder, 5Rights (a set of principles that would ensure the application of the existing rights of children on and offline equally)
Member, Royal Foundation Taskforce on Prevention of Cyberbullying
Commissioner, Children's Commissioner for England Taskforce 'Growing up Digital'
Commissioner, UNESCO Broadband Commission for Sustainable Development
Member, UNESCO Broadband Commission Working Group on Education
Board Member, Freeformers (digital transformation company committed to train young people in digital skills)
Founder, The Imagine Workshop (collaborates on technological designs that would make digital interactions better for young people)

Baroness McIntosh of Hudnall
No relevant interests declared

Baroness Quin
No relevant interests declared

Lord Sheikh
No relevant interests declared

Lord Sherbourne of Didsbury
No relevant interests declared

Specialist advisers

Professor Sonia Livingstone OBE
Member of Children's Commissioner's Taskforce on 'Growing up Digital'
Consultant to the Council of Europe (Dec 2016 – September 2017):
'Comprehensive guidelines for member States to empower, protect and support children's safe access to their rights on the Internet'
Member of Royal Foundation Taskforce on Cyberbullying
UNICEF research grant Global Kids Online
Executive board member of UK Council for Children's Internet Safety
Professor Livingstone has been commissioned by DCMS to participate in a literature review as part of its Internet Safety Strategy initiative

Professor Marina Jirotká
No relevant interests declared

A full list of Members' interests can be found in the Register of Lords' Interests:
<http://www.publications.parliament.uk/pa/ld/ldreg.htm>

APPENDIX 2: LIST OF WITNESSES

Evidence is published online at <http://www.parliament.uk/children-and-the-internet> and available for inspection at the Parliamentary Archives (020 7219 3074).

Evidence received by the Committee is listed below in chronological order of oral evidence session and in alphabetical order. Those witnesses marked with ** gave both oral evidence and written evidence. Those marked with * gave oral evidence and did not submit any written evidence. All other witnesses submitted written evidence only.

Oral evidence in chronological order

*	Will Gardner, CEO, Childnet International	QQ 1–10
*	John Carr OBE, Secretary, UK Children’s Charities’ Coalition on Internet Safety	
*	Dr Dickon Bevington, Consultant Child and Adolescent Psychiatrist	QQ 11–17
*	Dr Henrietta Bowden-Jones, Consultant Psychiatrist in Addictions	
*	Dr Angharad Rudkin, Child Clinical Psychologist	
**	Dr Julia Fossi, Senior Analyst, Child Online Safety Team, National Society for the Prevention of Cruelty to Children (NSPCC)	QQ 18–27
**	Ms Vicki Shotbolt, Founder and CEO, Parent Zone	
*	Ms Susie Hargreaves OBE, CEO, Internet Watch Foundation	QQ 28–36
**	Dr Jamie Saunders, Director, National Cyber Crime Unit, National Crime Agency	
**	Mark Donkersley, Managing Director, e-Safe Systems Limited	QQ 37–43
*	Professor Derek McAuley, Professor of Digital Economy, University of Nottingham	
*	Adam Glass, Partner, Lewis Silkin Solicitors	QQ 44–51
**	Steve Wood, Interim Deputy Commissioner, Information Commissioner’s Office	
*	Mary McHale, Teacher	QQ 52–60
*	Karl Hopwood, e-safety consultant, esafety Ltd	
**	Adam Kinsley, Director of Policy, Sky	QQ 61–71
**	Paul Morris, Head of Government Affairs and Sustainability, Vodafone	
*	Alice Webb, Director, BBC Children’s, BBC	QQ 72–78

- ** Tony Close, Director of Standards and Lindsey Fussell, Consumer Group Director, Ofcom [QQ 79–86](#)
- ** David Austin OBE, CEO, British Board of Film Classification [QQ 87–97](#)
- * Malcolm Phillips, Regulatory Policy Manager, Committee of Advertising Practice
- * Dr Nihara Krause, Consultant Clinical Psychologist, Founder and CEO, stem4 [QQ 98–107](#)
- * Dr Marc Bush, Chief Policy Adviser, Young Minds
- ** Simon Milner, Policy Director, UK & Ireland, Middle East, Africa and Turkey, Facebook [QQ 108–121](#)
- * Katie O’Donovan, Public Policy and Government Relations Manager, Google
- * Dr Akil Awan, Associate Professor/Senior Lecturer in Modern History, Political Violence and Terrorism, Royal Holloway, University of London [QQ 122–128](#)
- * Dr Sarah Marsden, Lecturer in Radicalisation and Protest in a Digital Age, Lancaster University
- ** Baroness Shields OBE, Parliamentary Under-Secretary of State for Internet Safety and Security, Department for Culture, Media and Sport [QQ 129–137](#)
- * Edward Timpson MP, Minister of State for Vulnerable Children and Families, Department for Education
- * Nicola Blackwood MP, Parliamentary Under-Secretary of State for Public Health and Innovation, Department of Health

Alphabetical list of all witnesses

- Anonymous [CHI0003](#)
- * Dr Akil Awan (QQ 122–128)
- Barnado’s [CHI0013](#)
- BBC [CHI0053](#)
- * BBC Children’s (QQ 72–78)
- ** BBFC (QQ 87–97) [CHI0025](#)
[CHI0064](#)
- * Dr Dickon Bevington (QQ 11–17)
- * Dr Henrietta Bowden-Jones (QQ 11–17)
- Brass Horn Communications [CHI0041](#)
- BT [CHI0020](#)
- Alex Burchill [CHI0065](#)

*	Dr Marc Bush (QQ 98–107)	
	CARE	CHI0022
*	Childnet International (QQ 1–10)	
	Children’s Charities’ Coalition on Internet Safety	CHI0001 CHI0057
	Children’s Commissioner for England	CHI0028
	Children’s Media Foundation	CHI0027
	The Children’s Society	CHI0004
*	Committee of Advertising Practice (QQ 87–97)	
	David Miles Consulting	CHI0012
	defenddigitalme	CHI0042
**	Department for Culture, Media and Sport (QQ 129–137)	CHI0055 CHI0067
*	Department for Education (QQ 129–137)	
*	Department of Health (QQ 129–137)	
**	e-Safe Systems Ltd (QQ 37–43)	CHI0015 CHI0056
**	Facebook (QQ 108–121)	CHI0044
	Family Online Safety Institute	CHI0033
	Girlguiding	CHI0026
*	Adam Glass (QQ 44–51)	
*	Google (QQ 108–121)	
	Wendy Grossman	CHI0046
*	Karl Hopwood (QQ 52–60)	
	Horizon Digital Economy Research, University of Nottingham	CHI0032
	Baroness Howe of Idlicote	CHI0017
**	Information Commissioner’s Office (QQ 44–51)	CHI0049
	Internet Advertising Bureau UK	CHI0036
	Internet Matters	CHI0040
	The Internet Service Providers’ Association	CHI0031
*	Internet Watch Foundation (QQ 28–36)	
	JAN Trust	CHI0063
	Mike Johnston	CHI0062
*	Dr Nihara Krause (QQ 98–107)	
*	Professor Derek McAuley (QQ 37–43)	
	Emily McDool, Department of Economics, University of Sheffield	CHI0008

*	Mary McHale (QQ 52-60)	
*	Dr Sarah Marsden (QQ 122-128)	
	Mayor's Office for Policing and Crime	CHI0048
	Microsoft UK	CHI0050
	Poppy Morgan	CHI0035
	Abhilash Nair	CHI0037
	National Council of Women	CHI0030
**	National Crime Agency (QQ 28-36)	CHI0043
**	National Society for the Prevention of Cruelty to Children (QQ 18-27)	CHI0014
**	Ofcom (QQ 79-86)	CHI0051
		CHI0060
	Dr Victoria Nash, Oxford Internet Institute	CHI0021
**	Parent Zone (QQ 18-27)	CHI0011
	Professor Andy Phippen, Plymouth University	CHI0045
	Philip Powell, Department of Economics, University of Sheffield	CHI0008
	PSHE Association	CHI0005
	Jennifer Roberts, Department of Economics, University of Sheffield	CHI0008
*	Dr Angharad Rudkin (QQ 11-17)	
	Samsung Electronics UK	CHI0029
	Jenny Afia, Partner, Schillings	CHI0024
**	Sky (QQ 61-71)	CHI0038
	Dr Vera Slavtcheva-Petkova	CHI0054
	South West Grid for Learning (SWGfL)	CHI0009
	stem4	CHI0061
	Stonewall	CHI0039
	Karl Taylor, Department of Economics, University of Sheffield	CHI0008
	techUK	CHI0047
	Terrence Higgins Trust	CHI0058
	David Thewlis	CHI0066
	Three	CHI0016
	Virgin Media	CHI0052
		CHI0059
**	Vodafone UK (QQ 61-71)	CHI0023
	The Wild Network	CHI0019

Young Scot

CHI0034

YouthLink Scotland

CHI0006

APPENDIX 3: CALL FOR EVIDENCE

Children and the internet

The House of Lords Select Committee on Communications, under the chairmanship of Lord Best, is to conduct an inquiry into *Children and the Internet*. The Committee thus invites any interested organisation or individual to submit written evidence to the inquiry. Written evidence must be submitted by Friday 26 August 2016.

The Committee expects to hear oral evidence from invited witnesses from July to November 2016 and intends to report in the New Year. The Government has undertaken to respond in writing to reports from select committees.

Background

In the last few years, technology has rapidly increased the number of ways in which children access the internet and has enabled them to do so outside of the view of parents and teachers. At the same time, the variety of roles that media services have in a child's life has also rapidly expanded. The internet enables access to the World Wide Web, social media, games and many other online applications.

Ofcom's 2015 report *Children and Parents: Media Use and Attitudes* showed that:

- Over half of those aged 3–4 use a tablet and 1 in 7 have their own tablet,
- The amount of time 8–11s and 12–15s spend online has more than doubled,
- 12–15s now spend nearly three and a half hours a week more online than they do watching television.³⁴¹

This has raised a number of concerns. Children are now more likely to turn to social media and the internet for information than other more 'traditional' sources. Qualitative research commissioned by Ofcom showed "children and young people visited sites and accessed content online without actively thinking whether or not they could trust what they saw and read."

It is well-documented that greater access to the internet has increased the risk that children may view pornography or be the victim of 'cyberbullying'. One in four children have experienced something upsetting on a social networking site.³⁴² Social and technological 'blocking' strategies, such as parental controls, school-wide blocking of sites or parental supervision, have been employed in an attempt to restrict access to such harmful content.

Concerns have also been raised that new technology might encourage addictive behaviour and could alter cognitive, social and neurological development patterns in young children. In particular, it appears that some elements in the design of internet and digital services, present problems for young people. Among them, the presence of 'reward loops' as the building block of design to extend or prolong use.

341 Ofcom, 'Children and Parents: Media Use and Attitudes Report' (November 2015): http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/children-parents-nov-15/childrens_parents_nov2015.pdf [accessed 14 March]

342 NSPCC, 'Online abuse: Facts and statistics' <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/facts-statistics/> [accessed 14 March 2017]

Data protection poses another problem for children.³⁴³ There is a risk that their personal data may be collected or transferred without them being aware. There is also concern that the online activity of children may remain visible to future employers or academic institutions.

Rationale for the inquiry

The aim of this inquiry is to examine the concerns, as well as the possible benefits, presented by the changing relationship between children and the internet; and to investigate how policies and practices might increase the value of the internet for children. We define ‘children’ to mean any person under the age of 18, but we would be interested to hear how policy should be adapted to address the particular needs of different age groups. The inquiry will focus on three main areas:

- (1) How the increase in use of and access to the internet is affecting the development and wellbeing of children in both positive and negative ways.
- (2) The responsibility of industry to develop and maintain controls, and the responsibility of users to practise self-governance
- (3) Legislation and regulation in this field.

Questions

The Committee would like to receive evidence which addresses the following list of questions. Witnesses are requested to concentrate on areas of expertise.

Risks and benefits

- (1) What risks and benefits does increased internet usage present to children, with particular regard to:
 - (i) Social development and wellbeing
 - (ii) Neurological, cognitive and emotional development,
 - (iii) Data security.
- (2) Which platforms and sites are most popular among children and how do young people use them? Many of the online services used by children are not specifically designed for children. What problems does this present?
- (3) What are the technical challenges for introducing greater controls on internet usage by children?
- (4) What are the potential future harms and benefits to children from emerging technology, such as Artificial Intelligence, Machine Learning and the Internet of Things?

Education

- (5) What roles can schools play in educating and supporting children in relation to the internet? What guidance is provided about the internet

³⁴³ Margarita Hakobyan, ‘Parent’s Guide to Keeping Kids Safe Online and in Social Media’, *Huffington Post* (21 March 2016) http://www.huffingtonpost.com/margarita-hakobyan/parents-guide-to-keeping-kids-safe-online-and-in-social-media_b_9506274.html [accessed 14 March 2017]

to schools and teachers? Is guidance consistently adopted and are there any gaps?

- (6) Who currently informs parents of risks? What is the role for commercial organisations to teach e-safety to parents? How could parents be better informed about risks?

Governance

- (7) What are the challenges for media companies in providing services that take account of children? How do content providers differentiate their services for children, for example in respect of design?
- (8) What voluntary measures have already been put in place by providers of content to protect children? Are these sufficient? If not, what more could be done? Are company guidelines about child safety and rights accessible to parents and other users?

Legislation and Regulation

- (9) What are the regulatory frameworks in different media? Is current legislation adequate in the area of child protection online? Is the law routinely enforced across different media? What, if any, are the gaps? What impact does the legislation and regulation have on the way children and young people experience and use the internet? Should there be a more consistent approach?
- (10) What challenges face the development and application of effective legislation? In particular in relation to the use of national laws in an international/cross-national context and the constantly changing nature and availability of internet sites and digital technologies? To what extent can legislation anticipate and manage future risks?
- (11) Does the upcoming General Data Protection Regulation take sufficient account of the needs of children? As the UK leaves the EU, what provisions of the Regulation or other Directives should it seek to retain, or continue to implement, with specific regard to children? Should any other legislation should be introduced?
- (12) What more could be done by the Government? Could there be a more joined-up approach involving the collaboration of the Government with research, civil society and commerce?

18 July 2016

APPENDIX 4: DEVELOPMENT OF CHILDREN

This chart summarises the development of children at various ages from 3-18: how they see themselves, their priorities, their behaviour online and their attitude towards risk.

3–5 year olds		
Overall development	Key online activities	Attitudes to risk
<p>They can put themselves in others' shoes, but they are still quite fooled by appearances.</p> <p>Beginning to learn that there are social rules to follow.</p> <p>Starting to build up friendships but peer pressure remains low.</p>	<p>Entertainment, particularly games and TV.</p>	<p>They may be unaware of risks.</p>
6–9 year olds		
Overall development	Key online activities	Attitudes to risk
<p>Play is mainly pretend/role-play, moving towards greater rule-based reality play. Becoming socially more sophisticated; the need to fit in and be accepted by the peer group becomes more important.</p> <p>Learning how to manage their thinking and their emotions. Learning about the complexities of relationships; if they can't manage these it can lead to alienation, bullying and loneliness. At around 7, they undergo a significant shift in thinking to more order and logic.</p> <p>They are now frequent users of the internet but with limited information on staying safe online, which may make them vulnerable.</p>	<p>Entertainment and fun–games, films, TV, video.</p> <p>Communications largely with family only</p>	<p>Children largely compliant with messages from school/home– although if risks aren't explained clearly, they imagine their own explanations.</p>

10–13 year olds		
Overall development	Key online activities	Attitudes to risk
<p>Moving towards more adult ways of thinking but still not making decisions the way adults would.</p> <p>Very aware of social pressure and expectations; will change aspects of themselves in order to fit in and be accepted by peers. Friends are becoming more important.</p> <p>More aware of what’s ‘cool’ or not, including brands.</p> <p>Girls show a decrease in self-esteem as they compare themselves to others around them.</p>	<p>Communications with friends; games (for boys), gossip, TV/ films, shopping.</p> <p>Open communication across a range of sites.</p> <p>Visual communication becomes key.</p> <p>Development and honing of self-image.</p>	<p>Developmentally, the strong desire for immediate rewards triggers risk-taking behaviour</p>
14–18 year olds		
Overall development	Key online activities	Attitudes to risk
<p>Undergoing significant neuro-psychological changes, leading to differences in the way they perceive emotions and make decisions. Developments in the pre-frontal cortex may contribute to the increase in risk-taking behaviour seen during adolescence.</p> <p>Mental health difficulties such as anxiety and depression can intensify.</p> <p>Still have difficulties realising that others can have a different perspective, so may find it hard to work out interpersonal problems.</p> <p>Adolescence is a time characterised by idealism, with a tendency towards all-or-nothing thinking.</p> <p>Highly dependent on peers for a sense of well-being. They need to feel as if they are part of a group - yet also want to be viewed as unique.</p> <p>Can appear to shun adult influence but still require clear boundaries and support from parents and teachers.</p>	<p>Communications with friends; games (for boys), gossip, TV/ films, shopping.</p> <p>Open communication across a range of sites.</p> <p>Visual communication now vital and the ‘currency’ of likes and ratings is very important.</p>	<p>More settled within peer groups.</p> <p>Beginning to get better at the risk/reward equation.</p>

Source: Dr Angharad Rudkin, Chartered Clinical Psychologist, University of Southampton

APPENDIX 5: THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD

Article 2

1. States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
2. States Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members.

Article 3

1. In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration.
2. States Parties undertake to ensure the child such protection and care as is necessary for his or her well-being, taking into account the rights and duties of his or her parents, legal guardians, or other individuals legally responsible for him or her, and, to this end, shall take all appropriate legislative and administrative measures.
3. States Parties shall ensure that the institutions, services and facilities responsible for the care or protection of children shall conform with the standards established by competent authorities, particularly in the areas of safety, health, in the number and suitability of their staff, as well as competent supervision.

Article 12

1. States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.
2. For this purpose, the child shall in particular be provided the opportunity to be heard in any judicial and administrative proceedings affecting the child, either directly, or through a representative or an appropriate body, in a manner consistent with the procedural rules of national law.

Article 13

1. The child shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of the child's choice.
2. The exercise of this right may be subject to certain restrictions, but these shall only be such as are provided by law and are necessary:
 - (a) For respect of the rights or reputations of others; or
 - (b) For the protection of national security or of public order (ordre public), or of public health or morals.

Article 16

1. No child shall be subjected to arbitrary or unlawful interference with his or her privacy, family, home or correspondence, nor to unlawful attacks on his or her honour and reputation.

2. The child has the right to the protection of the law against such interference or attacks.

APPENDIX 6: THE ONLINE AND OFFLINE WORLDS

373. There are a range of measures designed to protect children from harmful or inappropriate content. The table below highlights the difference between measures applicable in the traditional media or 'offline' arena in comparison to the online.

	Television and Radio content	Gambling	Pornography	Gaming
Offline	<p>Viewing content:</p> <p>The Broadcasting Code has a section dedicated to protecting children from unsuitable content on TV and radio, including rules about the 9pm watershed on TV.</p> <p>There are rules about the times broadcasters choose to schedule their programmes, as well as restrictions on programmes broadcast before the watershed that include offensive language, violence, sexual material, and dangerous or harmful behaviour that children might try to copy.</p> <p>Purchasing content:</p> <p>Proof of age required: under the Video Recordings Act 1984 Supply of an '18' classified DVD/Blu-Ray to someone under 18 is a criminal offence - subject to a fine or imprisonment for up to six months</p>	Proof of age required	<p>Proof of age required</p> <p>Supply of DVDs/ Blu-Rays that are classified 'R18' outside of a licensed sex shop is an offence - subject to a fine or imprisonment for up to six months</p>	Proof of age required for certain age restricted (usually console) games.

	Television and Radio content	Gambling	Pornography	Gaming
Online	<p>“TV-like” video On Demand Programme Services (ODPS) in UK jurisdiction are subject to a set of minimum regulatory standards. ODPS include services such as TV catch up and online film streaming services.</p> <p>The platform these services are delivered on does not matter, so services on connected TVs, apps on mobile phones and programmes viewed through set top boxes may be regulated under this legislation.</p> <p>Content not classified as “tv-like” is not subject to any particular child protection regulation.</p>	<p>Age verification requirement</p> <p>Gambling (Licensing and Advertising) Act 2014 requires all overseas gambling operators have to apply for a license to offer services to British consumers.</p>	<p>Largely unregulated.</p> <p>Protection generally relies on use of filters.</p> <p>(age verification measure proposed in Digital Economy Bill)</p>	<p>Voluntary rating system by Entertainment Software Rating Board</p>

APPENDIX 7: MUMSNET FORUM, COMMITTEE VISIT AND MEETING WITH CHILDREN

Mumsnet

From 24 October 2016, Mumsnet, a website for parents, hosted an online discussion forum on behalf of the Committee inviting users to contribute their views about children's use of the internet. The forum can be viewed here:

http://www.mumsnet.com/Talk/child_internet_safety/2763806-MNHQ-here-contribute-to-House-of-Lords-Children-and-the-Internet-inquiry

Committee visit to Richard Atkins Primary School

On 8 November 2016 Members of the Committee visited Richard Atkins Primary School in Brixton to observe a special assembly presented by Google. Lord Best, Lord Gilbert of Panteg, the Earl of Caithness and the Bishop of Chelmsford were in attendance. This was part of the 'Internet Legends Tour', an initiative which Google had developed in partnership with Parent Zone to promote online safety in schools. The information was targeted at children between 9 and 10, and was centred around four messages encouraging children: not to share personal information or images which might be embarrassing; to protect passwords; to think critically to avoid 'phishing' type scams; and, to respect one another online. The assembly was presented by a professional actor and with a well-made set. In a post-assembly meeting, Google told Members of the Committee that the assembly was presented in 40 schools a year. Google was intending to develop resources so that schools could present a modified version of the assembly by themselves. It had already developed lesson plans and presentation slides.

Meeting with children

On 29 November 2016 the Committee held an informal meeting with a group of visiting schoolchildren from Trinity School, Redditch, Worcestershire, with the assistance of Parliament's Education Centre and the Outreach Service. The children were aged between 14 and 16.

Lord Best, the Chairman of the Committee, led the discussion and other Members were invited to ask questions. Lord Best, Baroness Quin, Baroness Kidron and Lord Sherbourne of Didsbury were in attendance. An anonymised note was taken, a brief summary of which is below.

All the children used the internet in some form. One remarked that, while this technology "started so small", it was now possible to get everything on a phone. This came with a loss of privacy as it was possible to find out so much about a person online. GPS had enabled people to find their phone, but also potentially someone else's.

When asked about the effect of the internet on friendship, one child said that faceless interaction meant that there could be no filters on what people can or cannot say as they do not have to deal with the consequences.

While some children were aware about apps to track screen time and to send notifications when a limit had been passed, according to the children, the school did not hold discussions about overuse (the school did have e-safety lessons). All the children said that they would welcome alerts about overuse.

The children also agreed that maximum privacy settings on devices should be on by default.

The children said that they were aware that they were being targeted by advertisers.

The children were aware that, if they did not like content of themselves posted on social media, they could report it, but they acknowledged that normally it is for the uploader of the content to take it down. When asked, they all said that they would like the right to have content taken down.

Some children also suggested that prohibition of the internet would not work, but that a flexible approach was needed.

They advocated more education about hacking and privacy, and recommended that this should be for children of all ages.

APPENDIX 8: INSTAGRAM TERMS

Instagram Terms: Our Rules if you want to use Instagram

- (1) You have to be 13 or over.
- (2) Don't post anything showing violence, or that might make other people feel scared, or any images that contain nudity.
- (3) Don't use anybody else's account without their permission or try to find out their login details.
- (4) Don't let anyone else use your account.
- (5) Keep your password secret.
- (6) Don't bully anyone or post anything horrible about people.
- (7) Don't post other people's private or personal information.
- (8) Don't use Instagram to do anything illegal or that we tell you not to.
- (9) If you want to add a website to your username, make sure you get permission from Instagram first.
- (10) Don't change anything about our website or applications, upload any type of virus or do anything that might interfere with the way Instagram works. Don't send us ideas on how to improve Instagram.
- (11) Don't use any type of software or robot to create accounts or access Instagram, and don't send spam or unwanted emails.
- (12) Read our Community Guidelines and obey them when using Instagram.
- (13) Don't do anything that might affect how other people use and enjoy Instagram.
- (14) Don't encourage anyone to break these rules.

Your rights and our rights

- (1) You have the right to feel safe using Instagram.
- (2) Officially you own any original pictures and videos you post, but we are allowed to use them, and we can let others use them as well, anywhere around the world. Other people might pay us to use them and we will not pay you for that.
- (3) You are responsible for anything you do using Instagram and anything you post, including things you might not expect such as usernames, data and other people's music.
- (4) It will be assumed that you own what you post, and what you post does not break the law. If it does, and you are fined, you will have to pay that fine.
- (5) Although you are responsible for the information you put on Instagram, we may keep, use and share your personal information with companies connected with Instagram. This information includes your name, email

address, school, where you live, pictures, phone number, your likes and dislikes, where you go, who your friends are, how often you use Instagram, and any other personal information we find such as your birthday or who you are chatting with, including in private messages (DMs).

We are not responsible for what other companies might do with this information. We will not rent or sell your personal information to anyone else without your permission. When you delete your account, we keep this personal information about you, and your photos, for as long as is reasonable for our business purposes. You can read more about this in our “Privacy Policy”. This is available at: <http://instagram.com/legal/privacy/>.

- (6) Instagram is also not responsible for:
- Links on Instagram from companies or people we do not control, even if we send those links to you ourselves.
 - What happens if you connect your Instagram account to another app or website, for instance by sharing a picture, and the other app does something with it or takes your personal details.
 - The cost of any data you use while using Instagram.
 - If your photos are lost or stolen from Instagram.
- (7) Although Instagram is not responsible for what happens to you or your data while you use Instagram, we do have many powers:
- We might send you adverts connected to your interests which we are monitoring. You cannot stop us doing this and it will not always be obvious that it is an advert.
 - We can change or end Instagram, or stop you accessing Instagram at any time, for any reason and without letting you know in advance. We can also delete posts and other content randomly, without telling you, for any reason. If we do this, we will not be responsible for paying out any money and you won't have any right to complain.
 - We can force you to give up your username for any reason.
 - We can, but do not have to, remove, edit, block and/or monitor anything posted or any accounts that we think breaks any of these rules. We are not responsible if somebody breaks the law or breaks these rules; but if you break them, you are responsible. You should use common sense and your best judgment when using Instagram.
- (8) Although you do not own your data, we do own ours. You may not copy and paste Instagram logos or other stuff we create, or remove it or try to change it.
- (9) You can close your Instagram account by logging into Instagram and completing this form: <https://instagram.com/accounts/remove/request/>. If you do, your photos, posts and profile will disappear from your account but if anyone has shared your photos or personal details, or if anyone has shared your photos or personal details, or if we have used them ourselves for any reason, they might still appear on Instagram.

We will also keep all the data we already have from you and can use it as explained in paragraph 5 above.

- (10) We can change these rules whenever we like by posting an update on Instagram, whether you notice it or not.