

Principles for the safer use of connected devices and on-line services by children

Consultation response from *EU Kids Online*, June 2011

1. *EU Kids Online* welcomes this self-regulatory initiative by the European and international industry providing internet-related products and services as an important contribution to the ongoing effort to make the internet safer for children and families.
2. Recent research conducted by *EU Kids Online* reveals the scale and scope of online risks currently encountered by children on the internet. Four in ten (41%) of European 9-16 year olds have encountered one or more of the risks asked about in the survey and 12% of European 9-16 year olds say that they have been bothered or upset by something on the internet.
3. We understand that the Principles document (dated 18/4/11) is open for consultation, and we offer the following observations, based on our evidence.
4. The overarching framing of the UN Convention on the Rights of the Child (p.2) is an excellent framework. However, only children's right to privacy is mentioned in the Principles document. We urge recognition also of children's rights to:

... express their views freely in all matters affecting them (Art. 12), freedom of expression (i.e. to seek, receive and impart information of all kinds) through any medium of the child's choice (Art. 13), freedom of association and peaceful assembly (Art. 15), protection of privacy (Art. 16) and to mass media that disseminate information and material of social and cultural benefit to the child, with particular regard to the linguistic needs of minority/indigenous groups and to protection from material injurious to the child's well-being (Art. 17).
5. Taken together, these rights acknowledge the complex balance to be struck, as appropriate to the needs, age and context of children, to both positive (enabling) and negative (protective) freedoms and, therefore, (self-)regulation. As *EU Kids Online* research has shown, efforts to reduce risks can have the problematic consequence of also reducing opportunities, and vice versa. Thus both opportunities and risks must be taken into account when evaluating safety regulation.
6. The four outcomes for users are valuable – essentially, promoting end-user tools, awareness and digital citizenship, transparency and accessibility of information, and provision to report problems to appropriate agencies. It would of course be most desirable if a benchmark were now to be set so that progress towards these outcomes could be transparently evaluated.
7. *EU Kids Online* research shows that, in each of these areas, there is a considerable way to go if these outcomes are to be delivered.

For example, among the 25,000 European 9-16 year old internet users surveyed during 2010, less than one third (28%) of parents were found to filter the websites visited by their child.

Nor do parents get internet safety advice from the industry – most get it from family and friends (48%), then traditional media (32%), their child's school (27%), internet service providers (22%) and websites (21%) – only 9% of parents say that they don't want further information on internet safety.

Perhaps of greatest concern is the finding that only 9% of children who had been upset by cyberbullying reported the problem (e.g. clicked on a 'report abuse' button, contacted an internet advisor or 'internet service provider (ISP)') and, of those, only half said it was helpful. For those upset by online pornography, the figures are a little higher – 15% reported the problem and most of those found the response helpful. For sexting, 18% reported the problem but nearly half did not find the results helpful. For children upset by offline meetings with contacts made online, only one in ten reported the problem and only a third of those found the result helpful.

Children's digital skills are growing - most 11-16 year olds can block messages from those they do not wish to contact (64%) and most can find safety advice online (64%). Around half can change privacy settings on a social networking profile (56%) compare websites to judge their quality (56%) or block spam (51%). In each case, however, it must be asked if those who cannot do these things simply lack skills or whether, instead, the services are too poorly designed to be useful to children.

8. The remainder of the document is not clear in its relation to these outcomes. We propose that the areas of activity (content, parental controls, etc) should clearly state which of these outcomes they contribute to so that it is evident how all four outcomes will be delivered.
9. Finally, we express concern regarding the lack of clarity in section 7 of the Principles document (Implementation and reporting).

First, it is vital to establish benchmarks against which improvements can be measured. Without this, it cannot be clear what has improved or what remains to be done (i.e. where problems persist).

Second, the progress reports should reflect the achievements (or failings) of particular companies and services (- the specificity of the promised collective report is unclear in this regard). Without this, the Principles will not deliver the kind of advice that parents especially want (which services will best meet their needs, which services might leave their child at risk...)

Third, progress towards achieving the proposed outcomes should be independently evaluated and transparently reported. Without this, the Principles will not generate trust and accountability among stakeholders, especially the

public – children, parents, teachers, clinicians and child welfare bodies, leaving it very likely that calls for state regulation will continue.

We might add that academics, regulators, journalists and child welfare organisations will continue to conduct their own independent assessments of the risks and safety issues associated with children's internet use, including of particular technologies or services. The less the industry self-regulates in a trustworthy and accountable manner, the more likely are such external evaluations. It would seem advisable to create a trusted process, including independent evaluation and clear markers of improvement, as part of the self-regulatory process proposed by the Principles.

For further information on EU Kids Online reports:

Livingstone, S., Haddon, L., Görzig, A., and Ólafsson, K. (2011). *Risks and safety on the internet: The perspective of European children. Full findings*. LSE, London: EU Kids Online.

<http://eprints.lse.ac.uk/33731/>

Livingstone, S., Haddon, L., Görzig, A., and Ólafsson, K. (2010) *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. <http://eprints.lse.ac.uk/33730/>

Livingstone, S., and Ólafsson, K. (2011) *Risky communication online*. LSE, London: EU Kids Online. <http://eprints.lse.ac.uk/33732/>

Sonck, N., Livingstone, S., Kuiper, E., and de Haan, J. (2011) *Digital literacy and safety skills*. LSE, London: EU Kids Online. <http://eprints.lse.ac.uk/33733/>

Livingstone, S., Ólafsson, K., and Staksrud, E. (2011) *Social networking, age and privacy*. LSE, London: EU Kids Online. <http://eprints.lse.ac.uk/35849/>

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