



The Children's Media
FOUNDATION

House of Lords' Communications Committee's
**Children and the Internet Inquiry
Supplementary Evidence**

The Children's Media Foundation
2nd December 2016

1. The CMF has been following the Lords' Communications Committee evidence sessions with interest and we are struck by the unanimous response by ministers (Nicola Blackwood, Baroness Shields OBE, and Edward Timpson) that the challenges facing today's children online require a multi-stakeholder approach by government, parents, teachers, and industry.
2. We acknowledge that the Department of Education and Health are championing a number of initiatives to increase the resilience of children and improve internet media literacy across key stages 1-4 but felt it was not clear whether the DoE intended that to be compulsory across all these age-groups or if it would be dependent on a particular subject choice once a child reaches secondary school.
3. We also applaud the fact the money is to be spent conducting comprehensive evidence-based research into prevalence rates in relation young people's mental health and well being and what and how they consume online. That has been a long time coming and although the report will not be published until 2018, it is very much needed.
4. However, there was an overwhelming sense from all speakers giving evidence that the interventions being offered rarely reach beyond the school gates and all admitted that most parents are ill-equipped to help their kids manage the potential risks they may encounter on the internet.
5. Which then begs the question what responsibility does industry need to take in these issues?
6. We were heartened to hear Baroness Shields say that the government is encouraging the giants of the tech industry to embrace a policy of making their products safer by design, and that (as an ex-industry expert herself) Artificial Intelligence, machine learning and natural language processing could be employed to monitor and /or remove inappropriate material more efficiently. But we were surprised that so much faith is being put into the 'Big Four' companies to do the right thing voluntarily - given their track record to date.
7. Baroness Shields gave an example of a wholly owned Google start-up called Jigsaw pioneering lots of potentially useful tools but the evidence provided by Google and Facebook seemed to present a very different

internal policy view by these large corporate giants.

8. UKCCIS was regularly cited as the place where the government puts pressure on industry to step up (if it wants to protect its self-regulatory status) but UKCCIS has been criticised by others in the sector as a relatively closed club with little transparency or visibility beyond the big corporates represented.
9. We are particularly concerned that this lack of wider scrutiny allows big commercial players to hoodwink ministers or say one thing about best practice and then do another thing in day-to-day operations.
10. The Google and Facebook evidence sessions were a case in point. The Google representative was at pains to say that their services are governed by clear terms and conditions designed to help parents. Yet when it comes to YouTube (the most popular part of the Google empire as far as kids are concerned) the terms and conditions are so buried in legalese that no parent or child seems to understand that they effectively prohibit children even watching videos on the site (let alone posting clips or adding comment). For example: YouTube's Clause 2.3 states "You may not use the Service and may not accept the Terms if a) you are not of legal age to form a binding contract with YouTube or b) you are a person who is either barred or otherwise legally prohibited from receiving or using the Service under the laws of the country in which you are resident or from which you access or use the Service"
11. To make matters worse YouTube is actively engaging with all of the UK's children's broadcasters (BBC included) to create YouTube channels targeted at children - despite their own rules that suggest they shouldn't use the site. The kids' broadcasters (BBC included) collude with this because they want to reach more children but it sends a terrible message about what rules mean on the web.
12. It is important to stress that the CMF is not advocating that YouTube should exclude kids altogether but we do believe they should step up and make their services better by design so they don't need to hide behind legal loopholes.
13. Google's Safe and Restricted Searches were also mentioned as mature solutions, employed by lots of parents but these are again hidden (often a click away or below the fold) and 'off by default', so any child using a new browser as a guest will not benefit by the protections in place.
14. In fact the only significant safety feature introduced over the last five years seems to be the refinement of predictive text in the search in order to filter out sex abuse terms. In Baroness Shield's evidence it transpired this was specifically introduced when the government requested that they find a solution - which suggests more pressure is needed on a more

regular basis to keep that momentum.

15. We were also concerned that the overarching message we heard in the committee sessions was that User Generated Content is somehow much harder to monitor or pull down. Ironically content recognition of User Generated Content is where Google/YouTube have had real technological success in recent years - but only because it was needed for commercial reasons. If any child uploads a video with a commercial music track on it or an excerpt from a TV show, YouTube can automatically detect that this is not the child's own content and then run ads across it which then, in turn, generate income for the original rights holders (not before YouTube have taken their share!). If a fraction of the resource used for content attribution was directed at making YouTube more child friendly we believe we would see a vast improvement in the service in just a few months.
16. Similarly Facebook appeared to be saying that they don't profile their users based on what they post. (Their argument being that once a child slips through an age-gate by lying, they're unidentifiable unless another user raises an alert). This may be semantically correct but Facebook does profile users by what other pages they like etc. and generates huge income by offering the ability for third parties to target adverts at individuals with a particular profile. Again it wouldn't be impossible to use this to flag potential under-age users and then complete manual follow up checks.
17. On a similar note, the Facebook representative confirmed Facebook does not share personal data with non-Facebook companies. But they do offer extensive services to advertisers to target users with profiles similar to their specific market demographic via their own ad-platform. So while it is true no data exchanges hands, users are still targeted. This means that although an advertising executive may not know where you actually live, he or she can still bombard you with messages you may or may not want, based on some opaque profile Facebook has assigned to you.
18. What concerns the Children's Media Foundation most is not the individual instances cited above but the lack of transparency about what the big internet corporations really do beneath the bonnet and their public responses when questioned. None of the big User Generated Content sites have explicit children's policies and many say one thing in public whilst chasing contradictory content partnerships in private.
19. Even the BBC, the largest provider of home-grown digital children's content in the UK, seemed conflicted about how it should address industry trends. At one point the Director of BBC Children's appeared to agree that compulsive online content wasn't necessarily appropriate for kids but the in-house tech specialists at the BBC regularly brief games producers about how to make their content more 'sticky'. Again policy and practice may not be aligned due to pressures to hit targets and Key

Performance Indicators etc.

20. We were heartened to hear the Director of BBC Children's say she felt that it was important major products like the iPlayer should be designed with children in mind but we are minded this is not necessarily a view held across the BBC. (We were recently informed that the BBC had to close down a whole cohort of registered child users from their sign-in service because of an upgrade that had not considered children's data protection requirements adequately). The linking of children and adult accounts was apparently a fix to that and we don't know how effective it has been at migrating children across.
21. On social media too, the BBC response was a bit confused. There was a clear message that they do not engage on social media with children under thirteen years and yet they have Facebook pages for both Cbeebies and CBBC. Officially these are for parents only, but the content that the BBC social media managers post is inevitably attractive to children who may or may not already be on Facebook and it can send mixed messages to parents and kids. "Surely, if CBBC is on Facebook, Facebook must be safe?"
22. Finally, although not directly within the remit of this enquiry, the CMF feels the BBC should be more transparent about its strategy, spend and best practice regarding the evolution and improvement of children's digital services. We believe the BBC is in a unique place to influence the big players and champion a better internet for kids 'by design' but it is not always as open as it could be with research, technology and knowledge sharing and it often comes across as inaccessible and too introspective. We regularly hear from professionals in the children's production community that the BBC has commissioned research into particular areas of interest regarding safety, behaviours etc., but this research is not available for wider consumption.
23. Furthermore, to date there has been no public or industry consultation on the BBC's new children's iPlay service (as distinct from iPlayer) that was flagged as a major innovation in the Charter Renewal discussions. As far as we know all of the technology development for this has been done internally and we would urge the BBC to remember there are many independent digital producers who are also highly qualified in this area and that there is a positive advantage to engaging the wider industry and external expertise.
24. In an ideal world we would like to see the BBC open source some of these new solutions to other reputable children's online providers rather than use its public funding to just build its own in-house platforms into a massive digital one-stop shop that could drown out some smaller players.
25. To conclude, we believe that the government must put pressure on all major platforms that attract significant numbers of kids to make sure

their services are child-appropriate by default, and that they must publish clear, plain English, documentation about their children's policies that can be scrutinised and interrogated in an annual report - along with the operating costs and Research and Development spend on those child-friendly features. And if self-regulation proves inadequate then government should be prepared to intervene.



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