

Submission to the DDCMS Consultation on the Internet Safety Strategy Green Paper

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The Government's Internet Safety Strategy provides a useful first step forward in terms of a social media code of practice, safety by design initiatives for services aimed at children, greater efforts in digital literacy in schools and a more holistic approach to internet safety.

- **The single category 'children' is too broad:** More coordinated and concerted Government efforts to tackle the risks of online harm are to be welcomed, because there are serious issues and concerns about children experiencing inappropriate content and cyberbullying, the inadequacy of self-regulation and the paucity of children's digital self-protection skills. Any government responses to these issues need to be relevant to children's diverse needs and as well as offering protection, should also empower children. Responses also need to recognise that children cannot be treated as one monolithic group: younger and older children are at different developmental stages, and any consideration of their safety needs must reflect these differences and the different ways in which children of different ages engage with online content. Children deserve attention in relation to the internet because of their immaturity and vulnerability, but this has been a peripheral concern to internet companies. So far, the companies have only dealt with issues after they emerge. If the word children is to be removed from the title UKCCIS, then their needs must be addressed specifically within UKCCIS, so that they are not further marginalised.
- **Measures need to be evidence-based:** Any Government decisions in this area need to be closely evaluated and researched to ensure that interventions are appropriate, effective and adapted to keep up with the emerging risks facing children. This becomes more urgent as the online world becomes more mainstream, moving from self-publishing to vast swathes of content, owned and distributed by the main platforms (YouTube, Facebook, Amazon and Instagram) in much the same way as any other publisher. Proper evaluation will require funding for research over time that analyses the efficacy of measures and interventions and provides meaningful explanations, supported by evidence.
- **Industry self-regulation is not working:** The Government states that it is their objective to "harness the technical understanding and expertise of industry partners, in order to deliver thriving, safe and innovative online platforms". However, there is a real danger here of continued reliance on self-regulation by industry and this is quite clearly not working. Major international platforms like YouTube (Google), Facebook, Amazon and Instagram are not doing enough to safeguard children's safety online, although they are now effectively publishers, just like broadcasters, and satellite programmers, who are accountable. The time has come for publisher status to be acknowledged and acted upon. Relying on parents and children to avoid harmful content is not good enough, particularly in a situation where children are clearly targeted by platforms (through advertising) as part of a business model, which can be exploitative. Filtering technology does not work and children should not have to encounter inappropriate content or even children's content, such as well-loved cartoon characters, that have been doctored and made upsetting and harmful. We know that platforms like Instagram are extremely popular with children, but these platforms are not following practices that protect children and their data. Self-regulation is not working and government intentions for parents to give consent for children under 13 are unlikely to be effective unless backed up by universal age verification.

- **Safety matters as much online as it does in crossing the road:** Children are adept at exploring the online world and benefit from it in many ways in terms of friendships, learning, and freedom. However, being ‘digital natives’ does not mean that children don’t need protection from the risk of harm online. If we are concerned about things like road safety and mental health in the offline world we should also be paying attention to children’s safety in the online world. This requires a more holistic approach that goes beyond children, teachers, parents and digital literacy. It also means more than just relying on technological tools developed by industry. Any Internet Safety Strategy needs to be properly funded and resourced and evaluated for effectiveness. Past experience tells us that self-regulation and voluntary codes are largely ineffective unless they are evaluated over time. Working to make apps safer is not enough when children are still accessing online material through websites.
- **Building children’s resilience requires greater levels of trust:** There is a difference between the government wish for the UK to be “the safest place in the world to be online” and the best place to be online. If the Government is serious about the latter then it should also be thinking about the creative, educational and civic potential of the online world in addition to safety issues, and this requires clearer proposals. There is a danger that too highly restrictive measures on children’s online experiences will affect children’s ability to develop the resilience that will help them to deal with online risk as they develop. Highly restrictive measures are unlikely to build trust between children and parents/carers.
- **It’s adult behaviour that needs to change:** Rather than requiring children to change their behaviour online, there should be more emphasis on adults changing their behaviour. Rather than placing the burden on parents and by extension to children themselves (peer to peer, for example), there needs to be greater recognition of the complexities of screen media, that go beyond control and restriction. Rather than creating digital products without thinking about child safety, digital companies should be making products that are child safe from the outset.
- **The public deserve transparency and responsiveness from companies:** Rather than placing the burden of safety on parents and children It seems appropriate that the small number of global corporations that own social media platforms should take more responsibility for unpleasant and harmful content, should recognise and respond to legitimate public concerns about data gathering, and take effective measures to moderate content. At the moment there is Industry complacency and a lack of transparency about how they are dealing with issues, concerns and complaints that affect children. There are dangers if the industry self-regulates in ways that not accountable, and therefore not in the public interest. There are difficulties in implementing regulation. Regulation should be independent, transparent, and should include measures and complaints procedures that allow the public to have their concerns dealt with fairly and promptly. Just as factories that employed children came to be regulated in the 19th century in the interests of children and to stop their exploitation, it is now time for independent governance of the digital industry to be backed up by regulation.
- **Financing safety infrastructure needs careful thought:** A Social Media Levy could be a useful way of supporting the digital industry to develop safe content, experiences and spaces for children, but social media are only one part of what children access online (gambling, streaming). The levy should cover a wider spectrum of technologies and platforms. If it is to work effectively, the levy should be mandatory, and contributions should be based on

revenues not profits on companies of a certain size. It should be linked to an independent body, underpinned by legislation that can monitor digital safety, promote media literacy, and also undertake research and training. Large corporations should not be able to hide behind claims to commercial secrecy and global operations; it is in their interests to be more open about complaints and issues and how these are being dealt with.

- **Editorial standards can be regulated online as they are offline:** A Social Media Code of Practice is a good idea, but only deals with social media. Moreover, it will only have any impact if it is effectively monitored and tied to a regulator with powers to enforce standards through fines for non-compliance. Self-regulatory measures and codes have been singularly ineffective, and public opinion suggests that the industry has not done enough, and that commercial priorities take precedence over issues of public interest, particularly where children are concerned. When it comes to children, companies operating in the online realm should be regulated in the same way as those in the offline world. There are effective editorial standards for children's content in the broadcasting world and it would seem appropriate that digital platforms should be held to a similar set of standards. Focusing on online abuse is important, but this does not deal with other adult-oriented content which it is too easy for children to access inadvertently (sexual or violent content or content that promotes imitative behaviour). There is a clear need for a single, child-friendly responsive body, where children and adults could direct complaints so that **children's voices are heard**.
- **Parents are not the only ones responsible:** Improved digital literacy is only part of the solution, particularly if there is a risk that industry will take less responsibility. Focusing on technical and e-safety issues offers too narrow an approach. In the Green Paper there is too much emphasis on control and restricting children rather than encouraging positive uses of the internet. There is too much emphasis on parental responsibility when as a society we, including industry, are all responsible.

Bio: Jeanette Steemers is Professor of Culture, Media and Creative Industries at the Department of Culture, Media and Creative Industries, King's College London. A graduate in German and Russian at the University of Bath, she completed her PhD on public service broadcasting in West Germany in 1990. After working for research company, CIT Research, and international children's television distributor HIT Entertainment, she rejoined academia in 1993. Her book publications include *Changing Channels* (1998), *Selling Television* (2004), *European Television Industries* (2005 with P. Iosifidis and M. Wheeler), *Creating Preschool Television* (2010), *The Media and the State* (2016 with T. Flew and P. Iosifidis), *European Media in Crisis* (2015 with J. Trappel and B. Thomass) and *Children's TV and Digital Media in the Arab World* (2017 with Naomi Sakr). She has published many articles on the children's media industry. Her work has been funded by the British Academy, the Leverhulme Trust and the Arts and Humanities Research Council. She is a Trustee of the Voice of the Listener and Viewer and a Board Member of the Children's Media Foundation.