Ofcom Online Safety Bill: Call for Evidence

Parent Zone Submission, September 2022

About Parent Zone

Parent Zone sits at the heart of modern family life, providing advice, knowledge and support to shape the best possible future for children as they embrace the online world. We were founded in 2005 and since then have gone on to collaborate with many organisations who share our vision. The online world offers enormous opportunities to children, young people and families. But we also know it can pose huge challenges.

Our mission at Parent Zone is to improve outcomes in a connected world, so that children will be:
- safer online
- resilient to the challenges of the online world
- educated for a digital future

Reporting Mechanisms

This section outlines evidence about what providers of online services can do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms. This includes what features make user reporting and complaints systems effective, such as reporting routes for children and adults.

Parent Zone welcomes provisions in the bill designed to ensure that users can easily navigate the complaints procedures. However, that offers no comfort to adults with parent responsibility trying to act on behalf of their children. Parents are the gatekeepers of the internet for their children, and Ofcom's own Media Use and Attitudes Report 2020/21[1] highlights the need for them to be supported in this role through clear provision of parental complaint procedures.

The report records that just over half of 12-15 year olds have had some form of negative online experience, and while 70% of children in this age group had an awareness of reporting functions, only 14% had ever used the function. Children should not be expected to shoulder the responsibility for taking on these complex reporting systems without aid; it is imperative that parents be enabled to act on behalf of their children.

Just as there is a specialised reporting system for child sexual abuse online through the IWF[2], and support systems in place through the government for teachers who face abuse, parents need specialised support. We need to see greater clarity on the role of adults with parenting responsibility and how they might bring complaints to platforms or have access to a 'super complainants' process.

Child users

This section will discuss factors which might indicate that a service is likely to attract child users.

The factors which make services attractive to children are well known - a quick internet search brings up many articles advising app and website designers on how to make their products attractive to children: bright colours, characters with story lines, celebrating their achievements in the game to keep them interested, and an easy to navigate site.

We must think more broadly than this. Services should assume that children will go anywhere. Child users will access spaces that are not just designed for child users, so provisions must be made despite whether a space is more or less 'likely' to attract children. This line of thinking is

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[1] https://www.ofcom.org.uk/__data/assets/pdf_file/0025/217825/children-and-parents-media-use-and-attitudes-report-2020-21.pdf

[2] https://www.iwf.org.uk/report/?gclid=EAIaIQobChMI7t2A8p3i-QIVj4BQBh0W_Qr0EAAYASAAEgJZcfD_BwE

reflected in the Aged Appropriate Design Code passed in California (30/08/22), as the statue reads "Children should be afforded protections not only by online products and services specifically directed at them, but by all online products and services they are likely to access."[3]

The online world should not be treated as an anomaly, distinct from the rest of life, but instead as an extension of children's daily lived experience. Taking this into account, we should consider the way in which children are protected from unsafe spaces or unsuitable content. Just as there are websites designed for child users, so are there physical spaces - play parks, soft play areas, schools. These spaces have additional protections, but their needs are also considered in supermarkets or train stations. Similarly, we must think beyond 'child-friendly' areas on the internet, and consider what provisions can be put in place across the online world. In some online spaces, supervised access is appropriate, so we shouldn't make age a binary restriction that is likely to impact on children's rights and lead to risk taking behaviours amongst older young people.

This sentiment is supported within the UK's political system, as Baroness Kidron argues "We design playgrounds to be reasonably safe and a lot of fun. We design medicine to be reasonably safe and appropriate to your size. And we need to design the digital world to be reasonably safe and appropriate to your age any time."[4]

The OSB with its emphasis on age verification will inevitably lead to an increase in the use of VPNs - Virtual Private Networks. These will strip away existing protections and take children and young people to less safe parts of the internet, which needs to be considered. David Ludlow, writing for National Online Safety[5], highlights the risks of VPNs to parents. Namely, that parental controls don't work with a VPN so children can look at anything online, completely unrestricted; and that free VPNs often bring problems of malware and tracking. A study found that 38% of free android VPNs contain malware, and 75% are designed to track activity[6].

We must also be wary of adult-only services targeting (whether intentionally or inadvertently) children through their online design. One area in which this is a concern is online gambling - as gambling increasingly infiltrates the gaming industry, children are also exposed to more explicit forms of gambling. Fruit machine apps - colourful, with fun games and a rush similar to gaming - are attractive to even young children.

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[3] https://www.nytimes.com/2022/08/30/business/california-children-online-safety.html
[4] https://www.nytimes.com/2022/08/30/business/california-children-online-safety.html
[5] https://www.haberdashersabrahamdarby.co.uk/wp-content/uploads/2020/11/What-parents-need-to-know-about-VPNs.pdf

[6] https://www.haberdashersabrahamdarby.co.uk/wp-content/uploads/2020/11/What-parents-need-to-know-about-VPNs.pdf