

**Contact: Simone Vibert, Head of Policy and Research,
Internet Matters**

March 2023

simone.vibert@internetmatters.org

The logo for Internet Matters, featuring the text "internet matters.org" in white lowercase letters on a bright green rectangular background.

Key points

- **Parents are key to protecting children in their online lives.** Over four in five children (82%) go to their parents first when something goes wrong online. **The new regime will only succeed if it integrates parents as a key part of children’s user journeys.** For example, child-friendly terms of service should explicitly direct children to speak to their parents about the contents, and parents provided with additional information about the service to support this conversation.
- The new regime provides a huge opportunity to **formalise the role of the third sector.** At the moment, the sector provides informal accountability and input into decision-making processes of platforms, but there is **scope for the sector to do more.** This could take various forms, e.g. as trusted flaggers, the creation of independent ombudsman or a duty on providers of online services to consult the third sector when preparing risk assessments. This work would need to be sufficiently resourced.
- There is a continued role for **strong media literacy provision.** Data shows that the baseline media literacy capabilities of the general population is poor. One challenge is on **ensuring good quality of provision** – one solution to this could be the introduction of a **kitemarking scheme.**

About Internet Matters

Q1. To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online

Internet Matters is a not-for-profit organisation dedicated to supporting parents and professionals to keep children safe and well online. We are one of the most popular information sources among parents - in 2021/22 we received just over 9.7 million visits to our site.

In addition to our work providing advice, information and support, Internet Matters has an **extensive research programme**, giving us significant insight into families’ experiences of digital technology and what they think and feel about being online. We conduct a tracker survey with a representative sample of 1,000 UK children aged 9-16 and 2,000 parents twice yearly, along with our flagship Digital Wellbeing Index study annually. These surveys enable us to analyse trends over time and to compare responses by age, gender and more.

Furthermore, we regularly conduct **deep dive research projects on particular themes.** Examples include [Our Voice Matters](#) (which explored young people’s views on the Online Safety Bill)¹ and

¹ <https://www.internetmatters.org/wp-content/uploads/2022/04/Internet-Matters-TalkTalk-Our-Voice-Matters-report.pdf>

[Refuge and Risk](#) (which demonstrated the elevated risks faced by different groups of vulnerable children online).²

We use our insights to **champion the views and interests of families**, making evidence-based recommendations to all those with influence over children’s digital lives. This includes our industry partners - which span Internet Service Providers, social networks, gaming platforms, hardware and software manufacturers and more - as well as government, policymakers and parliamentarians. Internet Matters is represented on the Government’s Media Literacy Taskforce Steering Board and the Executive Board of the UK Council for Internet Safety (UKCIS), as well as Ofcom’s Making Sense of Media Panel. We chair UKCIS’s Vulnerable Users Working Group.

Internet Matters is a **long-term advocate for greater online regulation**. We are delighted to offer the evidence below in support of Ofcom’s preparation for its new duties under the Online Safety Bill, focused on our areas of expertise. **This submission contains just a snapshot of the data available to us – please do not hesitate to contact us if there is further data or analysis you require.**

Children’s access to services

Q5. What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

In 2021 Internet Matters partnered with TikTok to conduct research into children’s and parents’ views on age assurance across five European markets (UK, Ireland, France, Germany, and Italy). The research explored participants’ views on the importance of age assurance in addition to their preferred methods.

Acceptance of age assurance technology

We found that **age assurance was considered important and necessary by parents and teens** across all five markets. It was recognised that the current system of demonstrating age through self-declaration on sign up was insufficient when used in isolation. There was a consensus that social platforms and tech companies have a crucial role to play to ensure the safety of its users, particularly the youngest and most vulnerable, and that **age assurance was part of the solution**.

Nevertheless, the research identified some concerns around age assurance which should be addressed by platforms when enhancing their processes in this space. For example, some participants said they could become frustrated by more comprehensive age checks, pointing to the **need for platforms to explain these checks** by communicating their role in keeping children safe online. This could also strengthen the case for age assurance being conducted at the level of the app store, to reduce the number of times users need to go through the process. Both parents and teens also spoke of the need for age checks to **respect their privacy and ensure data is handled securely** (note that our [‘Our Voice Matters’](#) research with TalkTalk reinforces the point that teens care significantly about their privacy – to the extent that they have multiple

² <https://www.internetmatters.org/wp-content/uploads/2021/01/Internet-Matters-Refuge-And-Risk-Report.pdf>

accounts on individual apps so that they can have different levels of visibility for different friendship groups).³

Preferred methods

Our research considered **five different AI age assurance methods** that look at user attributes and tested them with parents across the five European markets. In the UK, it was notable all measures tested were received positively by parents. From most to least preferred, the rank order was as follows:

1. Assessing the account holder's appearance in their videos, bio photo, etc.
2. Assessing voice / audio to determine whether it's a child or adult voice
3. Looking at the content they engage with and form a judgement from that
4. Looking at language, phrases and grammar that an account holder uses when they post publicly
5. Assessing movements, e.g., the way they type

Where there was uncertainty from parents on the methods discussed, there were concerns about these methods on **their perceived accuracy rather than the principle** of them.

Parents were more open to the role of AI and tech in identifying underage users than teens, seeing the benefits of a secure and multi-layered system of age assurance. Teens frequently raised concerns about **fairness and accessibility** and were more dubious services could predict age with **sufficient accuracy**. However, as AI technology became more understood through the conversation - and that it would not impact their day-to-day usage - the greater the comfort level was for teens.

Other non-AI based methods were also tested. **'Hard identifiers'** such as the use of official documentation (passports, driving licences, student ID), were more accepted in the context of appeals after a user had been suspended, but **ranked joint lowest when proposed as an upfront requirement during registration**.

A **'selfie test'** was conducted with families where users were asked to follow a set of instructions and report back on how they found it went. The selfie test was positively received both in uptake and feedback. However, there were **concerns about how accurate it could be** to prove teens' age. Many parents stated that **in combination with a form of ID**, it would provide higher levels of accuracy and were supportive.

Content that is harmful to children

Q6. Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Prevalence of harmful content and experiences – including primary priority and priority

³ <https://www.internetmatters.org/wp-content/uploads/2022/04/Internet-Matters-TalkTalk-Our-Voice-Matters-report.pdf>

In our regular tracker survey, we present children aged 9-16 with a list of harmful online experiences and ask which they have experienced. This include the following entries⁴ which can be seen to map onto the **primary priority content** categories:

- Coming across sexual content
- Content promoting bad eating habits
- Content promoting self-harm

It includes the following entries which can be seen to map onto the **priority content** categories:

- Coming across hate speech
- Coming across violent content
- Online bullying from people they know
- Online bullying from strangers

Of primary note, the data shows that a large majority of children experience harms whilst being online – **4 in 5 children reported experiencing at least one online harm**. The graph below breaks down these harms, with primary priority harms highlighted in blue and priority harms highlighted in yellow.

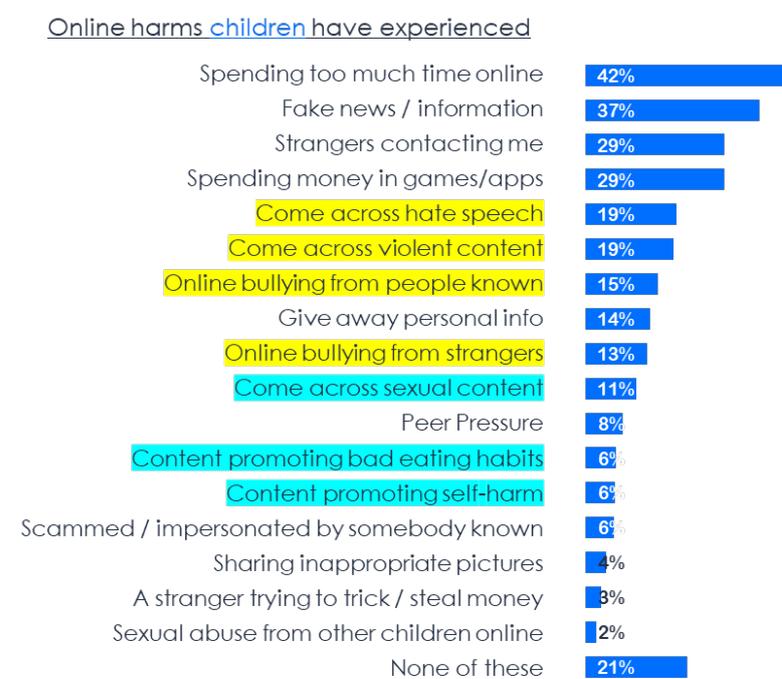


Figure 1 QB5. And which of the following have you done or experienced online? Please select all that apply. Base Wave 2, November 2022. Children (N-1,000)

This shows that **the top four harms children have experienced, according to children themselves, do not fall into the bracket of primary priority or priority content**. These are: spending too much time online (42%), fake news/information (37%), being contacted by strangers (29%) and spending money in apps/games (29%).

⁴ Note that the language used differs between children and parent in order to aid understanding and be sensitive and appropriate.

Unsurprisingly, children report experiencing the **priority harms more frequently than the primary priority harms**. For example, nearly one in five children (19%) say they have come across hate speech, whereas just 6% of children say they have seen content promoting self-harm.

We also ask parents (not necessarily of the same household) the same question about their children. We find that the results differ in some important ways.



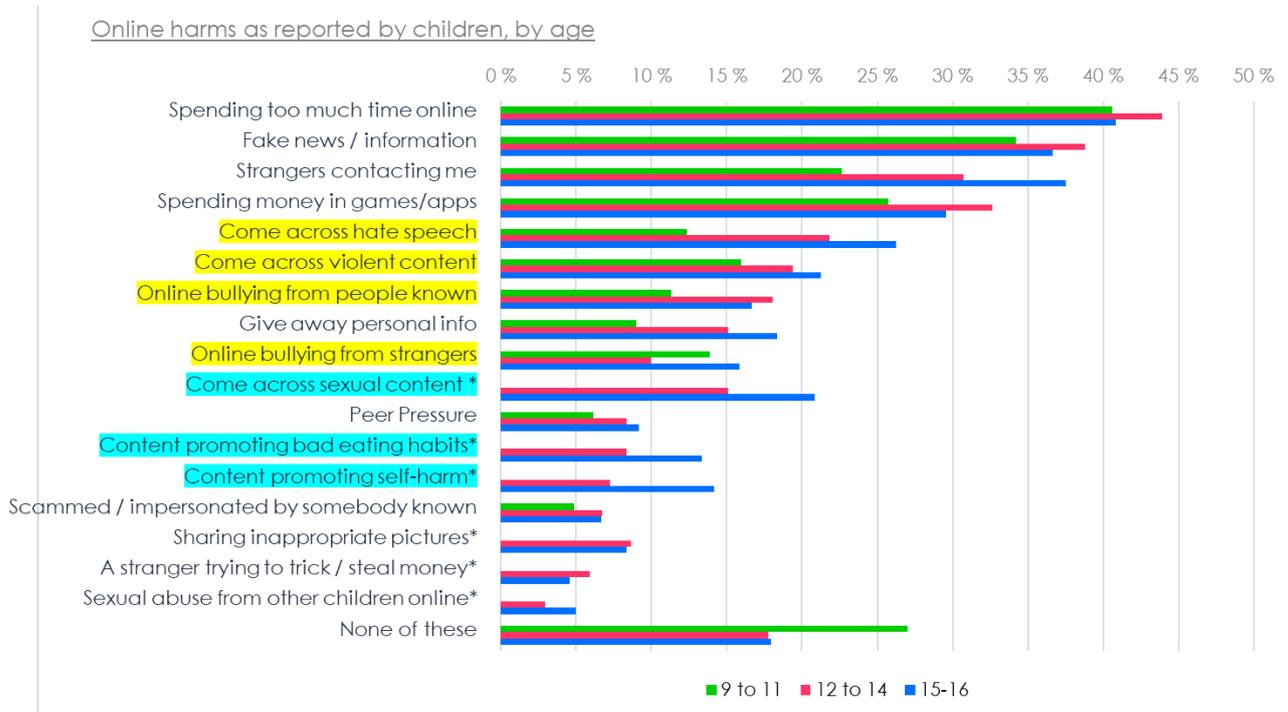
Figure 2 QB5. And which of these issues are you aware your child or children has had direct experience of online? How concerned, if at all, do you feel about any of the following issues in relation to your child / children's online experience? Base Wave 16, November 2022 (N=2,000)

Firstly, **parents appear to underestimate the extent to which children experience the softer harms** – including those in the primary content categories. In contrast, parents report children experiencing the more severe harms, including the primary priority categories, **on a larger scale than children themselves**. From this data alone we do not know if this is because parents overestimate how far children experience these things, or whether children do not recognise some of their experiences as falling into these categories.

Comparing across age groups, online harm experiences differ. We do not ask all online harms to children under the age of 13. Amongst the other dangers we ask about, those aged 9-11 are generally less likely to note that they have experienced a harm compared to older children: 27% of 9-11 say they experienced no online harms, compared to just 18% amongst 15-16 year olds.

The most significant differences of the online harms measured across age groups for the primary categories was seen in content around **hate speech**. 12% of 9-11 year olds said they had experienced this, compared to 26% of 15-16 (22% 12-14 year olds). This is perhaps due to the fact this content requires greater understanding of what it could look like, and that comprehension isn't there for many younger children.

Some of these differences by age may also be a result of older children spending more time online, therefore having greater opportunity to experience both benefits and harm.



* Asked to 13+ only

Figure 3QB5. And which of the following have you done or experienced online? Please select all that apply. Base Wave 2, November 2022, Children (9-11 n-389, 12-14 n-371, 15-16 n-240).

When combining our last two waves of data, we are able to look at how online harms affect different segments or audiences with a more robust dataset. Looking at what **activities or services children use online**, there is a stark difference across certain groups.

Children who use chatrooms and forums (12% of the total sample) were significantly **more likely to experience all of the categorised online harms**, compared to the total figure and also compared to other activities done by children. 36% of chatroom or forum uses were exposed to hate speech online compared to just 20% of children overall.

Online Harms by categories	All Children	Activities done online by children							
		Broadcast videos streamed live	Play games against other (multi-player)	Upload or share videos they've made themselves	Use chatrooms and forums	Use messaging apps	Use social media services	Watch videos streamed live	Play or use software in the metaverse
Come across hate speech	20 %	27 %	25 %	31 %	36 %	27 %	30 %	27 %	27 %
Come across violent content	19 %	24 %	23 %	24 %	30 %	21 %	24 %	25 %	23 %
Online bullying from people known	15 %	21 %	16 %	25 %	25 %	18 %	19 %	18 %	25 %
Online bullying from strangers	14 %	24 %	17 %	24 %	29 %	16 %	20 %	18 %	24 %
Come across sexual content	12 %	19 %	15 %	18 %	24 %	16 %	21 %	16 %	10 %
Come promoting dangerous eating habits	6 %	10 %	6 %	11 %	12 %	9 %	11 %	9 %	8 %
Come promoting self-harm	6 %	11 %	7 %	11 %	13 %	8 %	10 %	9 %	10 %
None of these	20 %	12 %	15 %	8 %	9 %	15 %	14 %	14 %	12 %

Table 1 Online harms, priority categories. Q:A4. And what do they do on these digital devices? Please select all that apply. 2 waves, November 2022 Children (N-2,000 Total, different base sizes for each activity done, all >n-100). Green signifies statistically significantly higher than the Total figure, red signifies a significantly lower figure.

We are also able to look at what **apps, platforms or websites that children told us they use** to look at online harms experienced by each user group.

The **gaming related platforms**, Twitch (used by 9% of our 9-16 year old sample) and PlayStation Network (19%) users, have the higher levels of online harms being experienced, particularly for hate speech: 39% of Twitch users have experienced it, and 31% of PSN users.

Online harms by categories	All children	Platforms, apps, websites used by children regularly							
		Facebook	Instagram	Snapchat	TikTok	Twitch	Roblox	Minecraft	PlayStation Network
Come across hate speech	20 %	27 %	30 %	29 %	26 %	39 %	21 %	24 %	31 %
Come across violent content	19 %	23 %	24 %	24 %	22 %	31 %	22 %	22 %	25 %
Online bullying from people known	15 %	20 %	19 %	20 %	19 %	27 %	19 %	18 %	17 %
Online bullying from strangers	14 %	21 %	19 %	18 %	17 %	27 %	19 %	17 %	21 %
Come across sexual content	12 %	20 %	22 %	19 %	17 %	28 %	11 %	13 %	17 %
Come promoting dangerous eating habits	6 %	11 %	12 %	12 %	10 %	11 %	6 %	7 %	8 %
Come promoting self-harm	6 %	11 %	10 %	11 %	9 %	16 %	6 %	7 %	9 %
None of these	20 %	13 %	14 %	13 %	13 %	9 %	15 %	15 %	12 %

Table 2 Online harms, priority categories. Q.A5) Which, if any, of the following sites, platforms, apps or games do you regularly use or visit? 2 waves, June 2022 and November 2022, Children (N=2,000 Total, different base sizes for each activity done, all >n-100). Green signifies statistically significantly higher than the Total figure, red signifies a significantly lower figure.

Whilst **this data does not prove a causal relationship** between the activities done by children and the online harms experienced, it does show a **correlation between types of activities done and online harms experienced**.

Q7. Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

In our tracker survey, where children say they have experienced a harmful experience online, we ask them to rate the effect it had on them from 1 to 7, where 1 is no effect, 4 is unsure/undecided and 7 is a high effect. We also ask parents for the perceived impact when they indicate that their child has had a harmful online experience.

Looking at the **children’s responses**, we find that **the impact of the primary priority harms is significant**. For example, among children who experienced content that promoted self-harm, 46% of children said it gave them high levels of distress, upset or harm whereas 36% said it didn’t impact them much at all (24% were undecided), leaving a net impact score of +10%pts. Similarly for all other primary priority harms, more children said the harm had had a serious impact on them compared to those who said it had low/no impact.

For the **priority content categories**, the impact of the harm is **more variable**. For example, online bullying had the highest impact score of all harms measured (64% net high impact), whereas for hate speech content it was more divided - 35% reporting a significant impact and 35% low/no impact, leaving a net score of 0%.

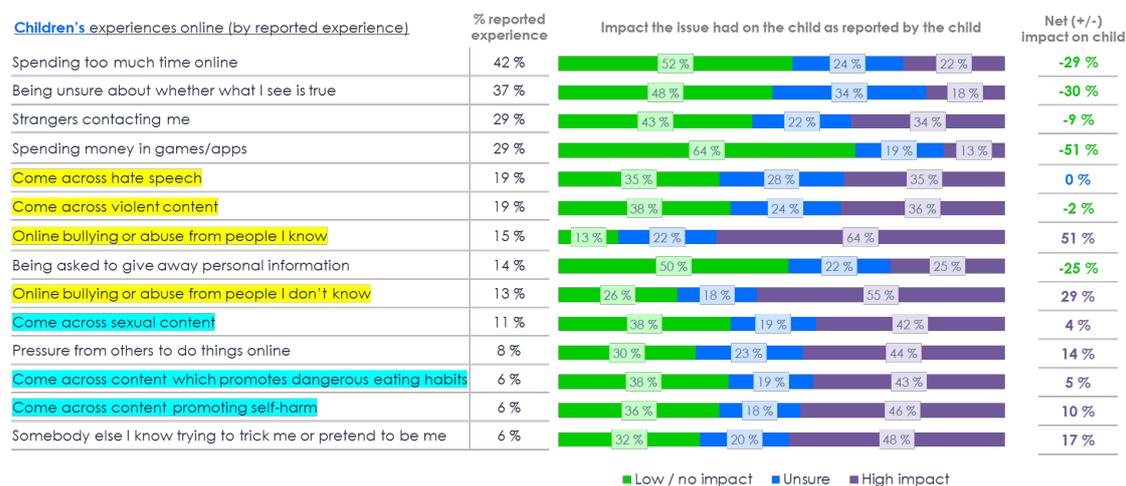


Figure 4 Q:B5b. You mentioned that you have experienced the following issues online. On the following scale 1 means 'it didn't affect me at all' and 7 means 'it caused me serious distress, upset, or harm'. Using this scale, please indicate how much you think this issue affected you, if at all. Please select all that apply. Base: Wave 2, November 2022, Children N-1,000

Turning to **parents**, there was a more concerted view that all harms barring one (spending money in games/apps) had more of a negative impact on their child than leaving no or little impact.

Amongst the **primary priority categories**, content on **dangerous eating habits** was seen to have the highest net impact score (+42%pts), meaning that the majority of parents felt this content was particularly damaging amongst their children who experienced it.

For the **other priority categories**, there were similarities with the children's responses including that **online bullying** was seen as one of the most impactful online harms. 64% of parents said it left their children in serious distress, upset or harm and just 17% said it left no or little impact (17% were undecided).

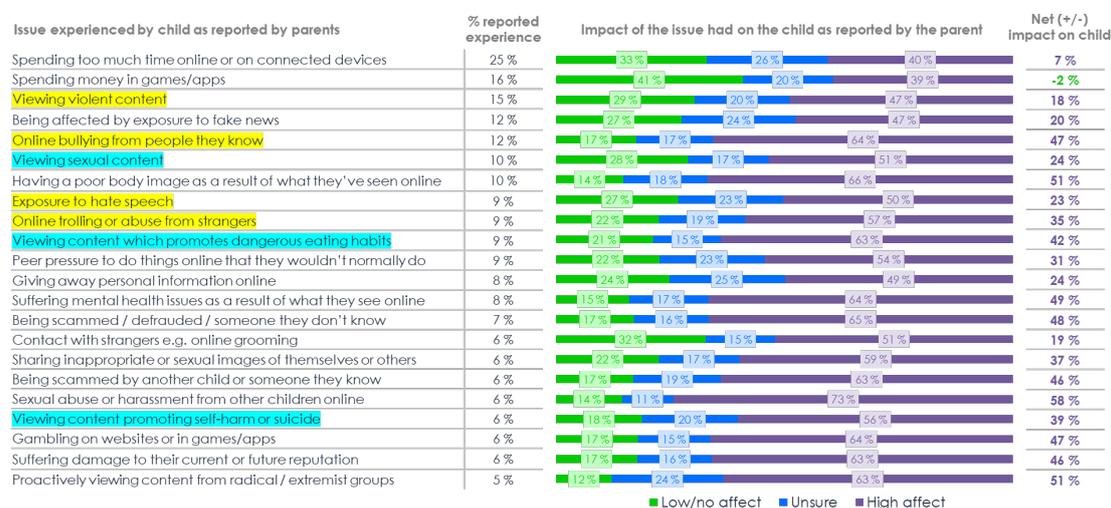


Figure 5 Q:B5b. You mentioned that your child / children has or have experienced the following issues online. On the following scale 1 means 'it didn't affect them at all' and 7 means 'it caused them serious distress, upset, or harm'. Using this scale, please indicate how much you think this issue affected them, if at all. If they have experienced this issue more than once or more than one child has experienced, please think in general. Base Wave 16, November 2022, Parents N-2,000

When looking at other **demographic segments**, there were groups that showed more significant impact over others. For **parents of vulnerable children**, all online harms measured had a high net

impact score, meaning most parents of vulnerable children who had experienced an online harm felt it **caused their child serious distress**. Amongst the **primary priority categories**, there is a similar pattern to the total parents' figures; 73% of parents of vulnerable children who experienced content around dangerous eating habits saw it had a high impact compared to 12% as low/no impact (5% undecided). All other primary content categories saw similar levels of high impact scores for this group.

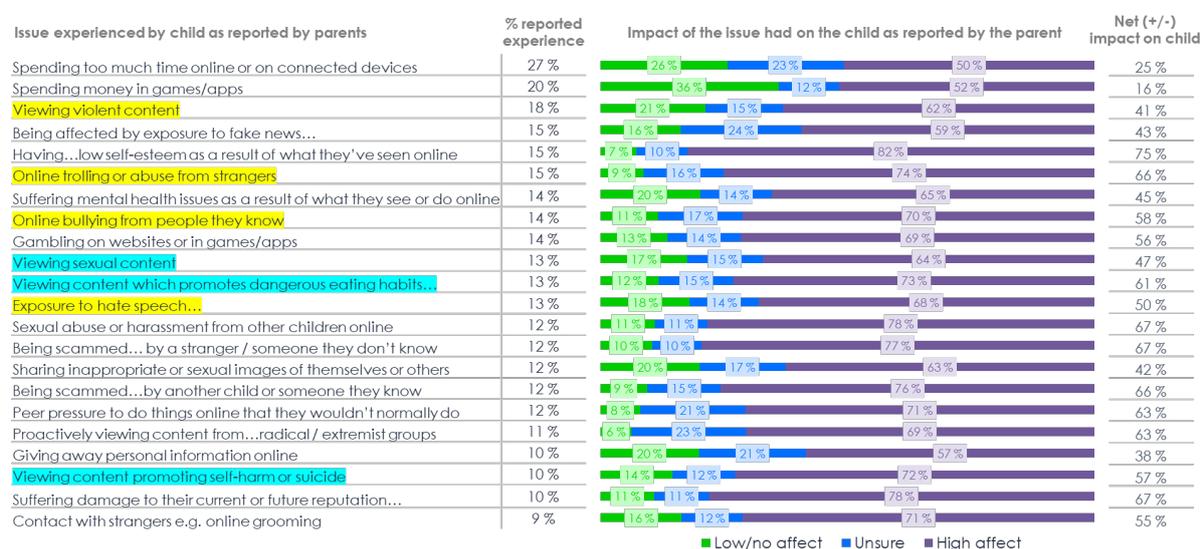


Figure 6 Q:B5b. You mentioned that your child / children has or have experienced the following issues online. On the following scale 1 means 'it didn't affect them at all' and 7 means 'it caused them serious distress, upset, or harm'. Using this scale, please indicate how much you think this issue affected them, if at all. If they have experienced this issue more than once or more than one child has experienced, please think in general. Base Wave 16, November 2022, Parents of vulnerable children N-516

Further evidence about the impact of online harms can be found in our [latest index report](#) on children's wellbeing in a digital world.⁵ In this research, we spoke to UK households of parents and a child of the same family unit to better understand digital habits, behaviours and experiences that impact a young person's wellbeing. In one finding around online harms, experiencing just one severely negative event online meant children reported significantly more negative effects on their wellbeing.

⁵ <https://www.internetmatters.org/resources/childrens-wellbeing-in-a-digital-world-index-report-2023/>

The wellbeing of children who have and haven't experienced an online harm

Children with at least one negative experience of online harm with severe impact



A black star denotes a statistically significant difference
Children aged 9-15, experienced at least one online harm reporting a severe impact. Wave 2 N=211.

Children with no reported experience of online harms



A black star denotes a statistically significant difference
Children aged 9-15, experienced no online harms. Wave 2 N=350.

Figure 7 Digital Wellbeing dimension measures for Children aged 9-15. Base: W2 DWI, August 2022, N=1,000

Children who reported at least one experience from the list of online harms and said that it had a severe impact on them appear to have significantly higher scores for all negative dimensions relative to the average for the 9-15-year-old sample. These scores are also drastically different from the negative dimensions scores of those who reported experiencing no harms at all, who show significantly lower negative dimension scores compared with the sample.

Risk assessment and management

Q9. What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Early evidence suggests that there are risks to children posed by **metaverse technologies** which need to be considered and addressed, as explored in our report '[A Whole New World: Towards a Child-Friendly Metaverse](#)'.⁶

Many (if not most) of these risks are not unique to metaverse technologies. They include:

- Exposure to inappropriate content
- Harassment, exploitation and abuse
- Misuse of personal data

However, our report explores how these risks can be **deepened and amplified in a metaverse environment**. For example, the impact of seeing self-harm, suicide or adult content in a metaverse environment, where children feel in close physical proximity to it, is likely to be more profound. Furthermore, typical strategies for addressing these familiar risks may not be effective in the metaverse. Traditional online content is largely text and image-based, and there is typically a record of it, which allows moderators to review it and users to report it if necessary. In contrast,

⁶ <https://www.internetmatters.org/wp-content/uploads/2023/01/Internet-Matters-Metaverse-Report-Jan-2023.pdf>

the metaverse is based on the idea of interactions between users, with a much greater audio-visual component. They may not be recorded as they happen.

The risks of the metaverse are reinforced by the fact that **many parents are not familiar with this technology**, with four in 10 parents (41%) say they don't know much, or anything, about the metaverse. These parents are less well equipped to support children as the metaverse continues to emerge, making safety by design even more important in this area.

While there are risks to the metaverse, our research also reveals that there are many benefits. It is therefore important that the metaverse is shaped in a child-friendly way, so that children can benefit safely. This will likely require a combination of:

- Preventing children from accessing certain parts of the metaverse;
- Making parts of the metaverse appropriate for all users, including children; and
- Adapting parts of the metaverse so that children receive a differentiated service according to their age.

Through the new regulatory regime, there is an **opportunity for Ofcom to shape the development of the metaverse while it is still nascent technology**, and help bring about this child-friendly metaverse. It is very encouraging that both the Government and Ofcom have stated publicly that they consider metaverse services to be in scope of the regime. But this intent needs to be matched by tangible action. In order to focus minds within industry on the need to address the possible risks of their metaverse services, rather than simply focusing on web 2.0 platforms, they need to be explicitly directed to do so. Internet Matters would like to see providers of **online services required to state which risks are created (or amplified) by their metaverse platforms, as part of their children's risks assessments**. Furthermore we urge Ofcom to consider whether there needs to be a **specific code of practice** for metaverse services.

Q10. What are the governance, accountability and decision-making structures for child user and platform safety?

The UK's third sector plays a role in the processes outlined above, including by providing advice which informs decision-making regarding child user and platform safety, as well as a degree of informal accountability. The new regulatory regime presents an opportunity to potentially formalise this contribution, leveraging the expertise of the third sector to enhance decision-making and accountability within industry.

Two examples demonstrate Internet Matters' existing contribution in this space:

(1) In June 2022 Internet Matters was contacted by our partner **BT**, which was in the process of conducting a **company-wide Digital Child Rights Impact Assessment (CRIA)**. BT's objective was to inform and support its work in identifying, preventing and/or mitigating risks to children's rights in the digital environment, as well as in positively enabling those rights.

Internet Matters provided expert input into this process, advising on:

- The most important child rights issues for BT and our expectations of companies such as BT;
- What we consider to be good practice; and
- Emerging child rights trends, risks and opportunities;

BT is now in the process of creating principles on children's rights in the digital environment to help inform consistent decision making across their business activities, which Internet Matters is providing feedback on.

- (2) In 2022, Internet Matters partnered with TikTok on [new research exploring the role of agency in teenagers' lives](#), with a focus on screentime.⁷ We undertook a series of focus groups with young people and parents across the UK and Europe, exploring how far children feel in control of their screentime, and how they could be supported to exert greater control. **Our research insights were fed back into TikTok's product development team and used to guide the creation of new screentime management tools**, including specific prompts for 13-17 year olds who use the app for more than 100 minutes in a single day.⁸

There is a challenge that **some providers of services are much more engaged with the third sector than others**. Some services which do not engage with the third sector have large populations of children using their platforms, and arguably have the greatest need of expert advice. Ofcom should consider how it can influence providers so that there are greater incentives on them to engage with experts in the third sector. For example, there could be a **duty to consult third sector organisations** (as well as parents and children themselves) when conducting children's risk assessments.

Terms of service and policy statements

Q11. What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

There are several factors which can improve the clarity and accessibility terms of service for children.

The most obvious and effective way in which children can be helped to understand terms of service is by **directing them to speak to their parents about it**. Tracker data from Internet Matters shows that **parents are by far children's first port of call for support** in their online lives: when something goes wrong online, over four in five children (82%) go to their parents (the next on the list is less than half of that with 39% stating they speak to their friends). Furthermore, our wellbeing research shows that in families where children and parents say they talk to each other about things that are important to them, children experience more of the positive effects and fewer negative effects of digital technology on their wellbeing than in families who say they don't talk to each other about these issues as often.⁹ Parents help children make sense of the online world – children should be continually encouraged to seek their support, including in interpreting terms of service.

Not all children have parents with the capacity to provide support in this area. This includes vulnerable children, such as those growing up in unstable households or in care. Therefore terms of service should direct children to speak to their parents **or another trusted adult, such as a teacher**. In our tracker research, a quarter of children say they go to their teacher when something goes wrong online, indicating that these are also an important source of support.

In addition to providers producing child-friendly versions of terms of service, providers should produce **additional information designed specifically for adults supporting children**, to help equip parents and teachers with the fuller picture so that they can have effective conversations with children on these. Furthermore, Ofcom should work with the **Department for Education** to ensure that children are **taught about terms of service at school** – despite online safety being key components of the RSHE and computing curricula, there is no requirement to teach

⁷ <https://www.internetmatters.org/wp-content/uploads/2022/06/TikTok-Agency-Report-ENG.pdf>

⁸ <https://newsroom.tiktok.com/en-gb/digital-wellbeing>

⁹ <https://www.internetmatters.org/digital-wellbeing-research-programme>

specifically about terms of service, nor is this a subject covered in the Department's non-statutory guidance on teaching online safety.¹⁰

Finally, it is important that providers **consult closely with parents, teachers and children themselves** when producing their terms of service, so that they can test their language and identify the areas which children, parents and schools think the documents should focus most closely on. Providers should not underestimate the skill that is needed to produce child-friendly versions of terms and service, and should be encouraged to work closely with child safety experts when producing them.

Reporting and complaints

Q13. What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Q14. Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Findings from our tracker survey reinforces wider evidence that there is currently a **challenge in supporting children to report harmful online content** and interactions. Over half (53%) of children say they know how to report when things go wrong, but **just one in five children who have experienced an online harm (20%) say that they have reported it**. The reasons behind this are **varied and complex**: For example, children often tell us that they do not have faith that platforms will act on their reports, while others do not consider the harm to be serious enough to warrant it, or are concerned about what the repercussions could be - on their friendships, school life and more.

This is another challenge which will only be successfully overcome by **engaging parents**. Given that parents are the first port of call for the majority of children when things go wrong online, they can play a critical role in **encouraging children to make reports and complaints**. However, they need to understand why doing so is important and how their children, or they themselves, can go about it. Part of the solution might be an **industry-wide campaign** to help communicate this message, run by an **independent platform** such as Internet Matters.

The third sector could play an even greater role than this. For example, there is a case to be made for the introduction of an **independent ombudsman** who children and parents can go to when they feel that a report/complaint has not been dealt with satisfactorily – similar to a provision that already exists in the VSP regime. The independent ombudsman would be able to help resolve individual cases, while also being in a position to identify trends in harmful experiences across different platforms and demographic groups, thus helping to inform the working of the wider regulatory regime. The ombudsman would need to have a clear understanding of the reporting processes across different platforms and be able to work with industry to overcome challenges.

In addition, third sector organisations could play a role as **trusted flaggers** to providers. This would be helpful in particular for tackling issues affecting **vulnerable children and parents who are less likely to engage with reporting and complaints processes themselves** – e.g. due to poor literacy, disability or many other factors. Evidence from Internet Matters consistently shows that children

¹⁰ <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

who are vulnerable offline are more vulnerable online too, experiencing harm at greater rates. This underlines the importance of their needs being prioritised.¹¹

Design and operation of the service, including functionalities and algorithms

Q18. How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

It is vital that providers have greater obligations to build safety and wellbeing into their products by design, which is why Internet Matters has been a long term advocate for the Online Safety Bill. But even in the context of a high quality, fully functioning regime, providers cannot have wholesale responsibility for keeping children safe online. There needs to be a **collective effort** between industry, government, parents, teachers and children themselves.

Ofcom needs to consider how media literacy fits with and alongside the new regulatory regime. As Ofcom's research itself shows, there is a **desperate need to improve the media literacy of both adults (including parents) and children**, for example:

- A third of adult internet users are unaware of the potential for inaccurate or biased information online.
- Nine in ten children aged 12-17 are confident that they can recognise advertising online, but less than four in ten (37%) correctly identify the links at the top of a search engine page as sponsored ads.

This is also indicated by Internet Matters research: for example, half of parents do not initiate an open, honest conversation with their children when something bad happens to them online, and just a third respond by turning on parental controls.

Media literacy education is critical – **on a greater scale than is currently provided, and to a higher quality**. It was extremely disappointing to see a proposed new duty on media literacy for Ofcom removed from a previous iteration of online safety legislation. In the absence of these explicit requirements, and over and above the existing work initiated by Ofcom in its December 2021 strategy, Ofcom needs to consider how to shape the landscape so that **all** children and parents receive a comprehensive offer in this space, including **but not limited to** the most vulnerable and hard-to-reach. This will necessarily involve working closer with schools and the Department for Education, as well as DSIT, to ensure a clear, joined up approach that encompasses both curriculum provision and out of school provision.

The third sector plays an important role in helping online services to provide media literacy support and resources. In the case of Internet Matters, our established operating model is for our partners to **direct their users to visit our independent site** via their help/safety centres, social channels and direct marketing.

We have operated this model since our inception in 2014 and have found it to be successful because:

- Families have **greater trust** in information, advice and support provided via an independent platform than that which is provided directly by online services themselves. They are reassured about the quality checks our resources go through and our impartiality. This makes them more likely to take act on what they read. For example,

¹¹ <https://www.internetmatters.org/wp-content/uploads/2021/01/Internet-Matters-Refuge-And-Risk-Report.pdf>

during our [Play Together/Play Smart campaign](#) with Electronic Arts, 600,000 parents accessed our resources, with 55% responding by turning on parental controls on their family's games console and 81% saying they were more likely to have a conversation with their child about staying safe online.

- Our website is a **one-stop shop** where families can receive support for all the platforms, activities and challenges relevant to their online lives. Rather than having to navigate numerous different pathways to support on individual platforms, they can access it in one place at Internet Matters, assisted by functionality such as [My Family's Digital Toolkit](#) which tailors our support for individual families.
- We are **experts in children's online safety and wellbeing**. Partners work with us because of our insight into family life and expertise on specialist topics such as support for vulnerable children.

The growth of our partnership base over the past nine years is testament to the success of this model, in the eyes of online services themselves. We now have 19 partners, including many of the large global organisations who will be covered by this new regime, who collectively enable us to provide support via a single organisation and brand to millions of families every year.

We envisage a **strong, continued role for the third sector** in providing media literacy support under the new regulatory regime. Our independence gives us credibility amongst families, while industry partners can coalesce around third sector organisations in a way that would be difficult in relation to a regulatory body (and also pose challenges to the regulator given its enforcement role). But there remains a question about the **future sustainability** of the media literacy sector, as identified in strategies from both Ofcom and the Government, with most of the sector being made up of charities and not-for-profits such as Internet Matters.

Linked to this challenge is the operation of some organisations, typically for-profit companies, providing online safety resources and/or training which is poor quality. In a fragmented marketplace, schools and other services can find it challenging to know where to turn for quality support. **Some companies are capitalising upon this fragmentation**, monetising schools' need for training and resources which fail to keep pace with changes in technology, or worse, offers inaccurate or irresponsible messaging. The solution to this challenge could be an **accreditation or kite-marking scheme** to signal to schools and parents which resources have met a certain quality standard and can therefore be trusted.