Public consultation response

Age Verification, Cross Media Rating and Classification,

Online Social Networking

http://ec.europa.eu/information_society/activities/sip/public_consultation/index_en.htm

EU Kids Online

www.eukidsonline.net

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Questionnaire 1: *Cross Media Rating*

We agree that, given the current trend towards platform and media convergence, the feasibility of cross media rating systems needs urgent discussion.

1. Of which media rating systems are you aware in your country. Has there been an attempt to implement a cross-media rating system? If yes, what are the positive outcomes of it and its success factors? If no, what could be used as a starting point towards a cross media rating system?

For console gaming, Iceland has implemented the PEGI system and this year the same system will be applied to DVD/VIDEO/TV. The system has been promoted by SAFT, the Safer Internet Action node in Iceland, in collaboration with the industry. The system is well known by consumers and used by the industry.

The UK has rejected a uniform content-rating system to date, recognising the different relationships that viewers have with content through various delivery platforms. Ofcom has suggested that the possibility of a cross-media common labelling system should be considered, treating as part of its media literacy remit investigation into the feasibility of a common labelling scheme for content across all broadcast and interactive platforms.

2. What are the main obstacles moving towards a pan-European cross media rating system?

We identify no serious obstacles in principle and, some hold, in practice.

3. What role should the different stakeholders play (industry, public bodies, etc.), towards implementing a pan-European cross media rating system?

Industry should accept and promote the system in collaboration with relevant public and private bodies. The legal environment should be clear and be able to address issues raised quickly.

that relies on children's truthful self-reporting of their age (something that the number of under 13's using social networking services quickly undermines).

3. Are you aware of legal requirements in your country for providers of online services to verify the age of their visitors/customers?

In so far as we have replies from different countries, the answer is generally 'no'.

In the UK, the Home Office Taskforce on Child Protection on the Internet has published guidance for social networking, aimed at parents and children, and the providers of social networking sites.[i] It makes several recommendations including those relating to safety information, editorial responsibility (including appropriate advertising), registration, user profile and associated controls, identity authentication and age verification.

4. Are you aware of relevant research, pilot projects or national initiatives towards age verification on the internet? If published online, please provide us with the relevant URL.

Unfortunately not.

Questionnaire 3: *Online Social Networking*

1. What risks are minors most likely to encounter on SNSs? Are you aware of relevant research or statistics? If published online please provide us with the relevant URL.

Any SNS user in general and youngsters in particular are most likely to encounter the following risks:

Loss of privacy

Sexual harassment online

Sexual harassment offline when youngster arrange a meeting with online friend

Loss of high security level in physical life, e.g. by giving out information about hometown, high school, home address, phone numbers, personal picture

Receiving embarrassing content, such as sexual related, violent, xenophobic pictures, videos etc of unknown individuals or even of (close) friends

Viewing embarrassing content on friends' profiles

Becoming a victim of bullying

Being drawn into becoming a perpetrator of bullying

Online fraud, e.g. reconstruction of users' social security number using information often found in profiles, such as hometown and date of birth

Collection and storage of personal and private data/information used by corporations for advertisement and consumption reasons, e.g. by revealing information about favourite books, movies, music, TV shows, interests, hence, being bombarded with advertisements and special offers

Research:

As we have already noted in responding to the recent EC consultation on Social Networking Sites, there are only a limited number of European surveys with statistics relating to children's general usage and experience of social networking sites: e.g. Larsen (forthcoming) in Denmark, Anchor Ireland (2007) in Ireland and Ofcom (2008) in the UK. Many surveys do not report the age of the user or survey only adults.

The picture can be supplemented by other quantitative studies focusing on specific aspects e.g. Valkenburg, et al (2005) in the Netherlands (looking at self-esteem) and Taraszow et al (forthcoming) in Cyprus (looking at personal information online). In addition there are the various qualitative studies, such as Livingstone (2008) in the UK (on styles and privacy), Fluckinger (2007) in France (on the emergence of peer networks), Siibak (2008) in Estonia (on content creation) as broader studies that include data on the use of social networking sites, such as Aas-Hansen (2007) in Norway, Mascheroni et al (2007) in Italy and the TIRO project (forthcoming) in Belgium.

73% have used instant messaging at least once.
the most used instant messenger is MSN, and the most social media site is YouTube.

- 6,4 have found embarrassing, disconcerting images of people they know
- 5,6 have experienced the diffusion of personal information without their consent
- 2,3 have found embarrassing images of themselves

42,2% of the interviewees and 86,6% (81,1% boys, 91,3% girls; 89,2 % aged 13-14, 85,5% 15-17) of the users think ISPs should do something to prevent these situations.

2. What controls, if any, should be available to parents over their children's SNS accounts? Should parents be allowed to cancel accounts or change profiles of their children?

Not without their permission. This is their site and as children of the social networking generation they would never accept that and then there would become a gap between the parents´ and the child's communication and then there would be true danger. If there is no communication then parents don't know what is going on. It would be likely that the child would e.g. get a different site that their parents would not even know about and then they have no control. The best thing is for parents to have access to their sites and comment on the content and have an open communication.

3. Which tools are the most appropriate to protect minors when using SNSs? What further steps should SNS providers take to reduce the risks to minors on their sites?

(i) Education about privacy and online protection. Privacy is something that children (and sometimes adults) tend to forget and look at as non important when it truly is. In International Youth Panels, there has been much discussion about how difficult it is for children to report when something isn't right. They want a more visible "help button" where they can report if someone is bothering them and confidence that any request will be responded to promptly, confidentially and effectively.

(ii) SNS providers could:

automatically and regularly search for illegal, annoying, disturbing and risky behaviour/activities of its members
block a user's profile if illegal/inappropriate content is found on their profile or in their activities
introduce an age verification system to ensure user provides correct age
ensure default (privacy) settings when a new profile is being created and for all those who reveal themselves in some way to be legal minors, while also providing reminders of the importance of privacy subsequently.

4. What should Members States do in order to improve the safe use of SNSs by minors? (E.g. legislation, co-regulation, awareness activities, introduction of the subject into the educational curricula, etc).

Educational curricula both for children and their parents - parents update

ourselves! When teaching children - use videos that spark conversation, make them write personal information on their t-shirt and walk around school - how does it feel to walk around with all this information about you - how is that different from what you do on SNS?

Codes of conduct among self-regulating industry is also appropriate, as now developed in the UK with the Home Office's code of conduct just agreed and published. It is vital that such codes are independently audited on a regular basis to ensure compliance. This is the proposal of the UK's new Council for Child Safety on the Internet.

Awareness activities, e.g. production of spots, videos to be shown on TV and/or distributed to schools; workshops in schools.

Cooperation with public and private TV channels to incorporate a show about the safe use of the Internet and its risks, SNSs included into the children's programs.

SNSs being one lesson of the safer Internet subject to be introduced into the educational curricula.

Creation of a CyberCrime Unit at the police to deal with illegal internet content.

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