



**Formal (Public) Response from Sonia Livingstone,
London School of Economics and Political Science,
and Director of EU Kids Online (see www.eukidsonline.net),
dated 5 December 2009**

**To the Federal Communication Commission's
Notice of Inquiry in the matter of Empowering Parents and Protecting
Children in an Evolving Media Landscape (MB Docket No. 09-194), adopted
October 22, 2009**

A. Children's Media Use¹

Access (both quality and quantity) to the internet precedes any kinds of opportunities, and thus it matters that 25% of 6-17 year old children are still not online in Europe. Particularly low access persists in certain countries (notably Italy, Greece, Cyprus) and among certain population segments (esp. less well-off and/or rural households) – as well, of course, among younger children. However, e-inclusion policies largely focus on adults and surveys of use generally exclude children. When they address children, the focus is usually on schools, though many children lack sufficiently flexible access at school to explore the potential of the internet; to really grasp the benefits, home access is vital. Moreover, the evidence suggests that children's internet use is encouraged by their parents' internet use, so parents not yet online should be encouraged to use the internet.

At the same time, educational investment in ICT remains vital. Generally, greater internet use is associated with higher levels of education at both country and individual levels. So, improving educational achievement in general may be expected to increase the extent and sophistication of internet use. Beyond this, it is evident that there are many gaps in provision or insufficient or outdated provision of ICT in schools. This creates difficulties in ensuring that digital literacy in general, and internet safety in particular, is addressed as it arises across the curriculum (not simply in ICT classes) by teachers who have been recently and appropriately trained, and with adequate resources at their disposal.

Further, to embed the wider take up of online opportunities, media education should be recognised and resourced as a core element of school curricula and infrastructure. And schools must overcome the tendency to regard children's use of the internet at home as beyond their remit. For crucially, the resources of the school outstrip those of many parents, making schools the most efficient, effective and fair way of advising all children.

¹ See Livingstone, S. (2009). Maximising opportunities and minimising risks for children online: From evidence to policy. *InterMedia*.

B. Benefits of Electronic Media for Children

B1. A matter of children's rights

Online opportunities, whether provided at home or at school, are not only a matter of inclusion or the national skills base but also one of rights. The UN Convention on the Rights of the Child asserts children's rights to express their views freely in all matters affecting them, through any medium of the child's choice, plus freedom of association and peaceful assembly, protection of privacy and access to mass media that disseminate information and material of social and cultural benefit to the child, with particular regard to the linguistic needs of minority/indigenous groups and to protection from material injurious to the child's well-being.

Such an agenda that can and should occupy researchers, policy makers and industry alike, especially since the evidence suggests that while each child begins climbing a 'ladder of online opportunities' with enthusiasm, not so very many are, in practice, creative, productive, critical or civically engaged. Ensuring that all children get the opportunity to advance from simple to more complex activities requires encouragement, resources and support.

contact and conduct (see Hasebrink et al, 2009).⁴ This classification derives from the three modes of communication afforded by the internet:

- Content: one-to-many (child as recipient of mass distributed content);
- Contact: adult-to child (child as participant in an interactive situation predominantly driven by adults);
- Conduct: peer-to-peer (child as actor in an interaction in which s/he may be initiator or perpetrator).

The most common risks, in terms of the three C's, are as follows.

With regard to content, it appears that seeing pornography and seeing violent or hateful content are among the most common risks, although not encountered by a majority of the children and teenagers and with some gender differences in these experiences. Boys appear more likely to seek out offensive or violent content, to access pornographic content or be sent links to pornographic websites. Girls appear more likely to be upset by this. Not every use of pornographic or violent content constitutes a (emotional) problem and there can be disagreement about these risks between parents and children. Generally, there is more policy attention paid to pornographic than to violent content, and arguably efforts to reduce children's exposure to violent online content could be strengthened.

Prominent contact-related risks are receiving unwanted sexual comments and meeting an online contact offline. The latter is the least common but arguably most dangerous risk. Although we have little empirical research on commercial risks, this may be added to the list, since research shows that young children find it difficult to separate commercial and non-commercial content, and since this is difficult for many of all ages in the digital environment.

Conduct risks are often associated with self exposure. Giving out personal information (such including textual information or images on blogs or social networking profiles) is very common, and may be detrimental to the reputation of young people or it can expose them as possible victims for adults or adolescents with a sexual interest in children. Sending and receiving hostile messages within the peer group occurs fairly frequently, though less common is the use of various information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others (i.e. cyber-bullying). The common forms of potentially offensive internet activities are personal intimidation, exclusion, humiliation, ridicule, and so forth.

C2. Balancing Opportunities and Risks

One temptation is to seek all means of keeping children safe. But it is inherent to childhood and especially adolescence to take risks, push boundaries and evade adult scrutiny – this is how children gain resilience. On the one hand, genuine and unacceptable risks should be addressed and where possible prevented, but on the other hand, children

borne in mind to prevent safety proposals restricting children's rights and to prevent the promotion of online benefits neglecting possible risks.

reasons, schools have a key role to play in encouraging and supporting creative, critical and safe uses of the internet, crucially throughout the curriculum but also at home or elsewhere.

internet to support their children. The European parenting group, COFACE, outlines useful principles for supporting parents in their responsibility to keep their children safe online⁸.

Use of filtering technology has increased in recent years⁹ but filters remain difficult to choose and use and much problematic content (e.g. user-generated) is inadequately dealt with.¹⁰ Moreover, little is known of how consistently and appropriately parents employ these tools or whether, as popularly claimed, children can and do 'get around' them. Cultural differences mean that social and technical tools may be preferred by or more useful to parents in some countries compared with others. Generally, it seems clear that many parents find it difficult to know where to obtain guidance on supporting their child online, choosing a filter, assessing a website, reporting a problem, or setting rules. Therefore, a well-promoted, reputable, easy-to-use, publicly-funded 'one-stop shop' or parent portal in each country is greatly needed.

However, the most recent work by EU Kids Online suggests that different styles of parental mediation may be more effective in different cultural contexts, depending in part of parental values and preferred styles of parenting. Thus, when designing parental awareness-raising and mediation strategies, local contexts matter.

c. Raising awareness

Described by the European Commission's Safer Internet Programme as "actions that can contribute to the trust and confidence of parents and teachers in safer use of the Internet by children", awareness-raising is clearly a central focus of EC's Safer Internet Action Plan, implemented across Europe through the Insafe network of national awareness-raising nodes.

The use of picture and video sharing gives rise to new awareness issues with regard to *personal information risks*. Users' awareness of these risks should be a priority. Awareness materials should contain specific information on the implications of picture and video files being publicly accessible in terms of discoverability, communication of location identifying information, and syndication. It should also include the potential risks of posting pictures or videoclips to sharing sites, blogs, mblogs etc. as a permanent digital record which, once uploaded, may circulate freely in networks beyond the users' control.

Such awareness-raising should focus on both the collection and dissemination of pictures and videos by adults or adolescents with a sexual interest in children, as well as their use in other forms of online abuse such as bullying and stalking. Information should also include the risks associated with producing and uploading image or video-based content

intentioned purposes such as grooming or bullying. They should also be advised that services exist which enable blog discussions to be monitored, and that these may be used to enable users with ill intent to join discussions and appear to be knowledgeable about specific topics.

Users need to be aware of the fact that *cyber-bullying* can have far-reaching consequences for the victim. While some victims react less emotionally to cyber-bullying, others feel threatened or harassed (Hasebrink et al. 2009, *ibid.*). Children should be made aware that high-risk behaviour on the internet (handing passwords to peers, online posting of personal information, etc.) increases the risk of being bullied. Because of the anonymous nature of some internet communication services children believe that they can't be traced and consequently can't be punished. Also parents and schools should be made more aware of cyberbullying and related risks.

At the individual level, the priority now must be awareness-raising among younger children (and their parents and teachers) as they (rather than teenagers) are the fastest growing user group and little is known of their activities

(iv) that those who are vulnerable online are likely to lack adequate social and parental support offline.

d. Filters

Filtering has been deployed in the EU by Internet Service Providers (ISP) and mobile

online information and communication. The promise of media literacy, surely, is that it can form part of a strategy to reposition the media user - from passive to active, from recipient to participant, from consumer to citizen.

There are many reasons to welcome the growing efforts to promote media literacy at national and international levels, as this must surely aid efforts to maximise opportunities and minimise risks. But some express reservations that media literacy and safety awareness agendas are getting confused,¹⁴ even though the former has the wide ambition of overcoming the participation gap,¹⁵ supporting critical and creative literacies, and harnessing the benefits of the internet for all; while the latter is more instrumental, narrowly focused on a particular agenda of child safety to complement to self- and co-regulatory initiatives.

On the one hand, research charts many ways in which children (and adults) are gaining knowledge, confidence and sophistication in their navigation of and contribution to the online environment. On the other hand, many appear to use the internet narrowly, lacking confidence or knowledge, unsure what the possibilities are, anxious about the risks.¹⁶ For example, the interactive and creative online opportunities on offer can support learning, participation, communication, self-expression and fun. Yet some of these – for example, blogging or creating webpages – are only practised by a minority of young internet users across European countries, leaving the full potential of media education for enhancing pupils' creative digital skills far from being realised. Thus, media education should turn more attention to fostering children's creative participation in online environments.

Research also shows that children (again, like adults) vary considerably in their ability to access, judge and navigate among the range of media contents and services. Many r ability

D2. Teaching Media Literacy to All Stakeholders

In terms of media literacy programmes and initiatives, it is now vital to conduct thorough evaluations of the diverse media literacy initiatives being developed. It is not yet known, crucially, whether media literacy brings real benefits in terms of protection against harm, take up for communication rights, enhancing active citizenship or creative and cultural expression and learning. Nor is it known which strategies work best for which groups or under which circumstances.

It does seem, for instance, that peers have a substantial influence on how children take up the opportunity for creative online activities; also, young people discover new things to do with the internet mostly through their friends (Kalmus, 2007).¹⁸ This suggests the value of peer-to-peer teaching, and this could be more effectively resourced and integrated as part of media education in schools. Also, several entertainment and communication related online activities lead to the take-up of more 'approved' opportunities, e.g., searching for additional information or creative activities. Thus, instead of considering online games or instant messaging as a waste of time or even restricting using them, both parents and teachers could encourage a wider array of child-centred activities on the internet, to stimulate interest and self-directed learning.

Given the lack of critical knowledge of the online environment, especially its political, commercial and safety dimensions, teachers should also give a higher priority to guiding children in making informed choices online. As the online environment – in terms of platforms, contents and services, as well as regulatory and cultural conditions of use – continues to change, this education must be continually revised and updated.

As noted elsewhere, it must be recognised the encouraging creative participation will also bring risks, hence risks and opportunities must be addressed together. Furthermore, as with safety awareness and parental mediation, the limits of children's media literacy must be recognised. This is not to denigrate their abilities but rather to recognise the demands of a complex technological, commercial and, increasingly, user-generated environment. Hence the importance also of co-and self-regulation to complement and support children's media literacy.

D3. Regulation

Across Europe, all kinds of self-and co-regulatory initiatives are underway, including the EC's Safer Internet Programme's support for hotlines and awareness-raising, the Council of Europe's call for 'public service value' in online provision, the 2009 *Safer Social Networking Principles for the EU*,¹⁹ and the endorsement of the importance of media literacy in the EC's Audiovisual Media Services Directive. Since EU Kids Online has found that substantial proportions of children are encountering, often accidentally, pornographic, violent, hostile or racist content.²⁰ Since many lack the tools and skills by which they (or their parents) can prevent such exposure, such initiatives are important: potentially, age-verification, take-down, opt-in and opt-out, safe search procedures, moderation, filtering preferences, kitemarks, user-defaults, privacy settings, report abuse buttons etc. will make a real difference.

¹⁸ Kalmus, V. (2007). Estonian Adolescents' Expertise in the Internet in Comparative Perspective. *Cyberpsychology: Journal of Psychosocial Research on Cyberspace*, 1(1), 1-11. <http://www.cybpsych.org/>

