

Select Committee on Communications

Corrected oral evidence: Children and the internet

Tuesday 1 November 2016

3.35 pm

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Members present: Lord Best (Chairman); Lord Allen of Kensington; Baroness Benjamin; Baroness Bonham-Carter of Yarnbury; Earl of Caithness; Lord Gilbert of Panteg; Baroness Kidron; Baroness McIntosh of Hudnall; Lord Sherbourne of Didsbury.

Evidence Session No. 6

Heard in Public

Questions 72 - 86

Witnesses

[I](#): Alice Webb, Director, BBC Children's, BBC.

[II](#): Tony Close, Director of Standards; Lindsey Fussell, Consumer Group Director, Ofcom.

USE OF THE TRANSCRIPT

This is a corrected transcript of evidence taken in public and webcast on www.parliamentlive.tv.

Examination of witnesses

Alice Webb.

The Chairman: Welcome, Alice. Thank you very much for joining us. Your reputation precedes you. We are delighted to have you with us. Since other people do not have in front of them the excellent CV that we have, I am going to ask if you would put on the record your background, and where you are coming from in relation to our very special inquiry on children and the internet. Could you start us off with that?

Alice Webb: Yes, absolutely. It would be my pleasure. First of all, thank you very much for inviting me here this afternoon to talk about this hugely important subject.

I am Alice Webb. I am the director of BBC Children's and of BBC North. I have been with the BBC for 12 years and I have worked across many parts of production. I was the chief operating officer when we moved the BBC to Salford. I moved up there with my family and 18 months ago I took on the role of director of BBC Children's. In addition to that role, in recent months I have also taken on the role of director of the BBC across the north.

I was delighted to be able to come and speak to you this afternoon, because children and the internet is such an important topic. It is something that we worry about a lot at the BBC. We provide UK public service content for children, which we worry about day and night, and making sure that we can do that in the digital space and with as much access for children as we have done in the linear space is also very important to us. We know, and you know through the work you have been doing here, that there are no easy answers to how we do that.

One of the things that is incredibly important is that children have as much access to the UK public service content in the digital world as they have on TV, so that they have high quality content available to them. We cannot take on the role of supervisors, parents and carers, so we give people the tools and the education for them to have a healthy attitude and connection with digital content. I am delighted to be here to talk about that further.

Q72 **The Chairman:** Thank you very much for that. We are all very dependent on the BBC, the wonderful CBeebies and CBBC—he speaks as someone with six grandsons.

What are the key principles that guide you in deciding on the content that you then deliver? Do you have an evidence base that tells you what you should be bringing before us?

Alice Webb: Yes. First of all, we are absolutely governed by our mission, so we are there to inform, entertain and educate children. We add a fourth for BBC Children's, which is to inspire children to participate, to be

active. We then look across the array of what we create for children to make sure that we are doing exactly that: informing them with documentaries, current affairs and news that is specifically for children. We look at our dramas, making sure that we also provide entertainment. We are across every genre, and one of the things we hold incredibly dear to ourselves, no matter what pressures are on us, is that we still maintain a broad range of content for children.

We look at different age groups for children as well. As you know, we have CBeebies, which is for our nought to six year-olds, and CBBC for our six to 12 year-olds. We also look at subdivisions within that: what is specific for the six to nine year-olds; what might we have that is going to engage and entertain? We make sure that all our content is suitable. It may not hold their attention, it may not be attractive to them, because each child likes and enjoys different things, which is why giving them a variety of things is important, but we make sure that it is suitable for whichever age range it is targeted at.

On your point about what evidence we use in deciding what content to create, we talk to many children. We do something that we call stepping out; we go into schools every week and talk to children. We take over the class—we have some teachers who work for us—to talk to children, and not only about what they are watching or what might they like; we also take some shows before they have been created and show them to children. What is going on in their lives? What is the chatter in the playground? What are they talking about? What are they worried about?

We also do audience research once a quarter with children who do not know it is the BBC. We have a survey called Chatterbox. We go to about 2,000 children, so that they have an objective and independent input. Of course, we have our own audience research team, which means that we study charts and numbers, just as you would expect anyone else to do, to make sure that we have that broad range. We have things like our statement of programme promises; I am required to deliver 85 hours of news for children every year, for example. We deliver way over that, but there are a few other checks and balances in the system to make sure that we are giving that breadth to children.

Lord Allen of Kensington: Alice, can I pick up on one thing about practical examples? There has been coverage recently of the programme “Just a Girl”, which is about children’s sex change and an 11 year-old’s struggle to find hormones and such. This is not being judgmental, but you have MPs and family campaigners at one end of the spectrum saying that it is age inappropriate and people like Mumsnet saying that there is never an age for it to be too young. I would welcome your views on how your programmers make that judgment in what is an incredibly difficult area. This is a CBBC programme, and I think the age range you mentioned was six to 12.

Alice Webb: Yes, six to 12.

Lord Allen of Kensington: Could you help the Committee to understand

how you get to that very delicate judgment?

Alice Webb: Yes, absolutely. "Just a Girl" is a show that is primarily about bullying, which is a hugely important issue. We look at those things very individually and very carefully. We take expert advice from psychologists about the content that we put together. We put it together in a format that is appropriate for the age, and we also cover the storyline in language that we think is appropriate. We make sure that we go on to offer forward journeys, so that if there are questions that children—or indeed parents—have about it they can go on. You will see underneath "Just a Girl" there are a number of links that you can follow for that.

Part of our role is to convey information in an age-appropriate way, which we believe we have with that one—I am very proud of that show—but also to make sure that we are stimulating conversation. That is part of our public service role. We do that by talking to experts, and we have our own people who have decades of experience about how to tell stories to children in an age appropriate way.

Baroness Benjamin: I know how passionate you are about getting it right for kids, especially online, which is even more important. Would you consider having an advisory group that meets three or four times a year, with psychologists, programme makers and so on speaking to you and your team about whether you are getting it right or not? Do you think it would be a good idea to look not just per programme but generally about having an advisory group like the one we have with the BBC? I am on there for diversity. Would you consider doing that for children?

Alice Webb: Absolutely. I am always open to finding the right way to make sure that we are improving what we are doing. We do that internally within the BBC, so I sit down with colleagues across the BBC who are not in Children's to see that we have that check and balance. But I would always welcome the opportunity to broaden that further if we all believe that will help.

Q73 **Baroness Bonham-Carter of Yarnbury:** Moving on to the internet, we heard a lot, particularly last week, about the negative impacts of the internet on children. I am interested in what you think the benefits are of internet usage to children.

Alice Webb: Yes, absolutely. First and foremost, it is an amazing source of learning for children. It gives them fantastic access. One thing that is a huge positive is that every child learns in a different way. If you are a visual learner, you can go to somewhere like YouTube and watch a video about something; if you want to read about something, it gives you access to all that.

We know from our own experience with BBC Bitesize, our own learning platform, that 85% of children come to that during their GCSE time and say they benefit from it being there. That is access that we could not otherwise have for children. So, first of all, it gives them that access. It

gives them an opportunity to express themselves, whether it is film-making or online creativity. It gives them a real opportunity to see a world much wider than their own, which they might otherwise not see, to help them to understand the world around them and to increase their tolerance and understanding as they grow into adults, and it gives them access to content to make them just laugh out loud.

Baroness Bonham-Carter of Yarnbury: Are you concerned that restrictions being imposed might impair these opportunities?

Alice Webb: That is what I was referring to right at the beginning. We need to find the right balance between building in safeguards for children, finding ways to allow children and their parents and carers to have further recourse if they are not getting help from the safeguard, and allowing sufficient freedom. Every child is different. Again, right at the beginning I said that I do not believe that media providers like the BBC can be the people who sit there and say that they should or should not watch this or for this long, because that has to be done much more locally by the parents and carers.

Q74 **Lord Sherbourne of Didsbury:** Quite understandably, in your evidence you divide the very broad term “children” into what you call divisions and subdivisions of age. What is your evidence, from the extensive research that you have mentioned, for the different ways in which these divisions or age groups interact with the internet? In particular, how consistent are your findings for each group? As you have said in answer to the previous question, children learn in many different ways, so I wonder whether a consistent pattern emerges from the research or whether it is very varied.

Alice Webb: It is by and large consistent, so there are main tracks of children. There will always be children whose behaviour is above age or indeed below age. Sometimes children will flip between the two, but there is always a main chunk of children. At the youngest in the preschool end of things, children are making simple interactions. One of the things that is another positive of digital is children are able to exercise choice at an earlier age. It used to be that you had to be able to read, but with the invention of touch screens you simply have to have a finger that is strong enough to touch a screen to start choosing what you watch. It is about simple interactions about choosing, “I would like to watch this over that”. It is about simple interactions with games, about dropping shapes in. It is all about that kind of simple interaction.

There is a progression as children get older. At about five to seven they are moving on into the next level of interaction and are playing slightly more complex games. Children at that stage want to start to learn things, to repeat things. With that we see that the learning side of things gets more complicated as they move up, because they move from learning a skill to mastering a skill. That mastery may be, “I know every name in a football team and I am a master of that”, versus, “I know how to play the piano incredibly well”. Their interaction becomes broader. They start to

follow passions into that space as they get older. They play more complex games, and the breadth of what they are using is wider too.

The crucial thing that goes alongside children's interaction is also how their parents interact with them. You can put alongside what children do what parents do as well. In the early years our research and experience shows us that much of that interaction is supervised and parents still have heavy interaction in the choices that are made. In the middle age group, the seven to nine year-olds, they start to make a switch. By the time children are about nine upwards they start to be much more independent and make choices with parents a bit more in the background.

Lord Sherbourne of Didsbury: That is very helpful. This may be a difficult question because your research may not cover it, but do you have any evidence that the learning mastery development that you have talked about is greater now with these age groups than it would have been pre-internet?

Alice Webb: I do not feel that I can comment on that. One thing, though, that is not specific to that point but we know is that children want to be children as much as they ever did. Digital and the internet give them access to a broad range of things, but our research shows that four out of five children still read books for themselves outside school; four out of five children still play sport for themselves. My personal favourite is that four out of five children still want to spend their pocket money on sweets. So they want to be children as much as ever. We have not seen those things being different, but I do not know about your learning question.

Baroness Benjamin: You come from an engineering background.

Alice Webb: I do.

Baroness Benjamin: That is a great skill to have, because it means that you have to use your imagination. What prompted you to develop the iPlayer Kids, the iPlayer and CBeebies Playtime services? What sort of challenges did you encounter in designing these services?

Alice Webb: Why do we not start with the CBeebies applications—the Playtime Storytime and our new one, Playtime Island—which are specific apps for our youngest audience, our CBeebies audience? We developed them partly because they give us the opportunity to allow children to play in the way that I just described. They are all touch screen and allow children to interact and play, so it gives us that opportunity. It also allows us to create standalone playgrounds, online playgrounds for children that they can go and play in and enjoy those things in. Apps are very popular with our youngest audience, and we see people gravitating away from websites and on to apps, which is why you will see that we have more applications, and our more substantial apps sit in that end of the age spectrum.

We developed iPlayer Kids to be an environment that was child-centric, so our absolute focus was making sure that our design was child-centric for those. We created iPlayer Kids, which is particularly targeted at children who are at that crossover age between CBeebies and CBBC, to help them to navigate between. We were finding sometimes for children it was a daunting task about, "Where do I start with CBBC? I might be at the top end of CBeebies". We created the iPlayer Kids app to give them an environment that was just for them, which they could feel at home in, to help them get content that way, and it has further safeguards against them wandering off into content that is not necessarily age appropriate.

Baroness Benjamin: Some witnesses we have had have said that being online has taken children away from books and being creative in the conventional way rather than this new way that children are being introduced to. What risks does gamification—if it is called that—

Alice Webb: Yes. Gamification, yes.

Baroness Benjamin: —present to children? Are you concerned about the amount of time children are spending online and the potential for apps to encourage compulsive behaviour? Do you put anything in place for children to limit themselves, rather than waiting for the parent, because they know when to put a book down? How do they know when to stop there?

Alice Webb: There are a few things. On that last point first, we do not have timers built into our apps. When we developed them we talked to parents a lot. That was not one of the first features that they asked for with our apps. We absolutely promote—and I use them for my own children—overarching devices that limit time and things like that and we promote the education of that. But the flipside of that is why this inspiring part is so important for us for children: it is to inspire and call out to children to go and be active, to read a book, "We have a book club, so put this down and go and do that instead. Draw us a picture and send it in". Our content is absolutely littered with the call to action for children to go out and be active as well as enjoy things online.

On your question about gamification, that is something that we all need to be very aware of and to think carefully about. From a BBC perspective, gamification is another way to help children to engage with learning activities; it puts it into more of a game scenario. That is a minority aspect of what we do, but I observe it more widely on the internet, which is what might be described as sticky content—content that requires children to stay online a long time, because that is the only way they are going to receive the reward that they are desperately searching for, or that requires them to stay online and then pay for further upgrades. That is something that we all, as an industry, need to be very careful about.

Baroness Benjamin: The compulsive element of all that that brings.

Alice Webb: Yes, absolutely. With anything, your use of digital content online or in apps has to be part of a varied diet in life. Anything that is sticky that requires habitual behaviour, anything that requires you to

come back every day because your pet is going to die or anything online are things that we all have to be very careful about.

Q75 Baroness Benjamin: This leads on nicely to the next question. What is the main barrier to more services being designed specifically with children in mind to combat the kind of discussion we have just had? Do you think it is realistic to expect commercial designers to develop products in a child-friendly way, and do you develop products in this child-friendly way that we are talking about?

Alice Webb: Yes, we do absolutely. There are always developments in this space, which is why we made iPlayer Kids to take the big grown-up iPlayer and make it more child-specific. I would sit here and say, yes, absolutely, people should be designing their products and services with children in mind. It is a responsibility that people have. I also think that it is something that people will be demanding of commercial services, as these subjects are discussed more widely and there is greater awareness in the public about them. I see no reason why you cannot put the child front and centre with your designs of apps. One of the things that is hugely important in the digital space is about there being transparency about who is funding what, how things are paid for: are you advertising; do you have product placement? That is another very important aspect when we look particularly for children.

Baroness Benjamin: The BBC told the Committee that legal restrictions on children's data can prevent problems when trying to understand a child's use of a software product. What exactly did you mean by that?

Alice Webb: There are a number of things. Obviously there are incredibly important restrictions on collecting data on what children are doing online. We have seen recently in America people being fined for doing that subtly. It is possible that people will tell you that they cannot design a product to its best potential without being able to track some of the behaviour of what people are doing. For example, if I am a games maker, if I cannot track what children are doing I cannot tell you whether they get frustrated at that particular level or what they are doing with it, but I do not think those are good enough reasons not to be putting children first when we are designing things.

Baroness Kidron: I want to pick up on this idea about timing and time limited. You said you did not do that because parents were not interested or it was not at the top of their list. Then you went on to explain how other people use gamification. I absolutely accept that the BBC does it for the good of the child and in a child-centric way, but do you not think that it would be quite useful for the BBC to introduce time limits or timeouts in a very visible way as an example of best practice in an environment that has the child's best interest at heart? Is it not the case that most parents do not understand the whole issue of compulsive behaviour and that, in terms of what you could offer as an institution, it would be a huge win for the community because we would have something to point at?

Alice Webb: Yes, you are absolutely right. We do have a responsibility and we have a real role because we reach so many people, which is why we are so involved in making sure that we are educating parents with what is the right thing to do for their children. I completely accept your question about the BBC and where it is at the moment. I take that on board and we will look at that.

Baroness Kidron: Thank you.

The Chairman: I will just stay with this a little bit longer. When you are commissioning a programme or a game—and we have heard quite a bit about the compulsive or addictive behaviour that can follow from that—what do you do that is protective of the child that is different from other people whose interest may be to hold the child glued to the screen for as long as absolutely possible? What are you doing differently?

Alice Webb: We do a couple of things. Our games are secondary to the first iteration of that content. Take, for example, our Danger Mouse game, which is so very popular but is not the primary driver that we connect with children. We are already engaging them in a narrative that starts, “It is 11 minutes long. It starts here. It finishes there”. That gives an opportunity for it to stop. That goes for our cartoons too. Our games do not have 697 different levels that just go on and on and on; they are bound. They are engaging and interesting but they stop. They do not then take you on. There is no in-app purchase, no unobtainable goals at the end of it. We create them as simple add-ons to what we already do.

Lord Allen of Kensington: If I could stick with the theme of parental understanding, your own research shows that there is probably a lot of misunderstanding in relation to the internet. For example, a number of parents felt that if they had a parental PIN it would protect more children from post-watershed content rather than the need for guidance. In a practical sense, I would like to understand what work you have done in that area and, practically, what you think the BBC should do to help with that challenge. I think there is a high level of misunderstanding there.

Alice Webb: Absolutely. We participate in a number of moments through the year. We use our channels for grownups and for children to make sure that we are publicising and helping to raise awareness. We do that through our news content and at particular times of the year. We participate wholeheartedly in Internet Day, for example, or on anti-bullying, which is about the cyberbullying side of things. We commission research ourselves that can then generate new stories and further awareness of that. We create the material for our own online guide. Crucially, we are also increasingly playing a wider role in helping to connect together other parts of the industry. The BBC has a huge reach and has an important role to play, but I believe we also have a convening power that we are doing more. That is why you will see that the BBC recently became a founding member of Internet Matters, which is something with industry, ISP providers, alongside Google and now the BBC, about raising awareness that is connecting on to many of the resources that exist for parents.

It is a bit like the Forth Road Bridge; we can never do too much and we just need to keep doing it until it is ubiquitous and everybody understands it, and we will use all our channels and any convening power. We participate with members of this Committee—I also sit on other taskforces—to help to try to push this forward. It says in our submission that the BBC is looking to launch a new portal in the first half of next year, not to be the one-stop shop but to bring together all the power of the BBC and further connections to others out there. There is more for us to do, but it is something that I hope you will increasingly see, as well as what we describe as making sure that our public service is as strong in the additional space for children as it is in the physical and linear space.

Q76 Lord Gilbert of Panteg: Chairman, before I ask a question could I declare an interest? I advise Finsbury, which is a financial PR company, and they advise Telefonica UK.

Thank you for your submission, which is very detailed. I will pick up on Lord Allen's question. We are interested in the wider well-being of children, not just preventing danger online. In your view, does the BBC have a role in developing tools for the wider industry to look after the wellbeing of children, particularly technologically, and making them available to others outside the BBC?

Alice Webb: Could you say a bit more about what that might be?

Lord Gilbert of Panteg: We have heard from quite a lot of witnesses about the tools that are available to protect children online. You clearly have a whole suite of services for children. As part of that, you are developing tools. Do you see that the BBC has role, much like the initial development of the iPlayer, in providing tools to the industry?

Alice Webb: Yes, we absolutely do, and one of the areas that we do a lot in—it is front of mind—is helping to develop the emotional and physical resilience of children. That goes hand in hand with the protection, stopping the harm, but also with allowing them to be okay if they are exposed to those kinds of things. That is another area that I would absolutely see us partner with, and indeed we already do partner with, people. For example, Lifebabble for our CBBC audience is all about building that resilience and not just for the digital world; it is about loneliness, grief, bullying. We are already talking to further partners about how we might use that as a format and platform to be able to help build that side of children's lives as well.

We are always open to areas where people think, "Actually, we would like to partner". It is one of the things for the BBC generally, not just within BBC Children's but across the BBC—and with Lord Hall, our director-general, being very clear—that we are here to provide a platform not just for our own content but for other people's content, and to partner with people and be as open as we can. Where there is opportunity to do that, we absolutely will do so.

Lord Gilbert of Panteg: Thank you. In your submission and in your

previous answers, you told us about your role in bringing together resources from a variety of different organisations. Why do you think that is a role that the BBC should undertake? Do you see any conflict at all between your role in providing content, your editorial role, and bringing together guidance for particularly parents? How did the BBC decide to take on that responsibility?

Alice Webb: I do not think that is specific to children. It is part of our role in being there to make sure that we are signposting people to appropriate specialist people who are more experienced in particular areas. You see that across all the BBC's outlets. We are incredibly clear that our editorial content is independent of that. We will never be influenced by one particular provider, charity, whatever it is. It is always independent of that. It is then about providing further journeys where there might be something ongoing. For very specifically that reason, the BBC cannot be the answer to everything, but we do have an obligation, because we have such enormous reach across the organisation, to make sure we are connecting people where appropriate.

Q77 **Baroness Benjamin:** We talked about bullying, loneliness, mental health and so on. How do you ensure that the content that you are putting out, and whatever you are going to provide after you have put it out, ensures that children are at the point where they are using their imagination and they might think they are all like that but in fact it is not really? How do you balance the children who might be drawn into thinking that they are bisexual, that they are mental, and so on? What do you provide to ensure that there are children who—

Alice Webb: Yes, I understand.

Baroness Benjamin: But there are also children who would like to be—

Alice Webb: Yes, absolutely. This goes back to something I mentioned earlier, which is that throughout our content we encourage children to ask questions, to both follow for themselves but to talk to adults, whether that is an adult they know or specialist providers who can then talk to them—a child line or an NSPCC—to help them to express these questions and to understand whether it is real or something that they are exploring with their imagination. It is about putting in safeguards and this net, but also asking questions is a really important tool for the critical thinking and critical awareness that we want children to develop. There is not one specific thing that I can point to because that is something that we try to sow in throughout our content.

Baroness McIntosh of Hudnall: I want to ask you, as a precursor to the question I have written down here, particularly on CBBC, which I think you said is aimed at the six to 12 age range. Do you have any evidence about whether there is an off the cliff cut-off at 12 when puberty kicks in and people are starting to think that it may not be very cool to watch stuff that is branded for children, or is there a tail so that you have kids on into their teens still watching CBBC material? Do you track that in any way, obviously not person by person?

Alice Webb: Yes, our research shows that by the time you are about 10 you are probably starting to be aware, and is CBBC—I do not want to say too worthy—cool enough for you? By about the age of 10, and particularly when they transition into secondary school, we see children's exposure to media not quite explode but there is that cliff, if you like. We have children who are far beyond the age of 12 who come to us consistently, particularly with some of our dramas. Some of our most popular, such as "The Dumping Ground", "Wolfblood" and "Hetty Feather", draw in older children too.

Baroness McIntosh of Hudnall: On that point, I have to say that I did not know about "Dixi" until it came up as a result of this. I have not seen it all, but I see what it is and I see that it is specifically designed to try to get kids to think about some of the issues that we have been discussing. Do you think it hit the right age band? Was it getting to children? Is it getting to children at the point at which that is becoming an important issue for them? You have given us some figures that suggest that it has had a direct and measurable impact on children's behaviour. How did you collect that data and what would you say overall about that particular kind of content? As I understand it, it is designed for kids who are perhaps getting to the point where they may not be sharing their worries with their parents in the way that younger children maybe would, but perhaps do not yet have a network that they can turn to that will help them. How does it work?

Alice Webb: First to your question about did it really hit the right spot. The primary audience for it was 10 to 12 year-old girls. The storylines were slightly above that, which is part of the norm in being slightly aspirational, because that is what children find engaging. It hit that spot for the audience who came to it.

On your second question about the measurement and exactly why we see two-thirds of them and how we know, I will have to write to you and let you know about the surveys and the follow-up that we took with those children, because that is a level of detail that I am afraid I cannot share with you today.

Baroness McIntosh of Hudnall: Okay. But it is quite critical, is it not, for two reasons? One is obviously the stats. If you are going to disseminate them they have to be backed up, and I am sure they can be.

Alice Webb: Yes.

Baroness McIntosh of Hudnall: But more, as I perceive it, in this case you were using drama to be a drama with an end in itself but also to disseminate ideas in a very specific way. How did that come about, and is more of it envisaged?

Alice Webb: It came about in the same way in which we commission all our dramas, as I described right back at the beginning. We look at the whole range of what we do and look at whether there are needs out there for children that we are not fulfilling. We know from our research and

from others that two-thirds of children above the age of 10 are on social media. They should not be because of the age limit of 13, as we know, but they are. It is about making sure that we are playing our part in raising awareness of the right way to engage, to be digitally safe and healthy. Things like "Dixi" were specifically targeted in that light.

On your question about whether there will be more of those, we always use our dramas and all our content to raise awareness, whether about online issues or other issues. We will do that in the same way for our grownup drama and for children.

Baroness McIntosh of Hudnall: You have a section that goes with "Dixi", which I am looking at right now, and says, "Do you have any questions?" It points people towards Lifebabble, which you mentioned, and towards an advice helpline. Is there a lot of take-up for those direct helpline types of opportunity?

Alice Webb: I do not know, is the honest answer to that. Again, I will provide that information to the Committee.

Baroness McIntosh of Hudnall: Good. Thank you.

Earl of Caithness: I want to follow up your answer to Baroness McIntosh about age limits for children, social media accounts and getting parental consent. Are you in favour of a 13 year-old cut-off or a 16 year-old cut-off?

Alice Webb: I think that 13 is an age that is well understood. It is an age that coincides with a significant transition of children's development as they move on to secondary school and the years beyond that. We know that a lot of children are already on social media below that age, and it would be incredibly difficult to move to 16 because we are already struggling to keep them to 13. I think that is an age that is well understood and we are better to try to make that one work than move it up.

Earl of Caithness: You did that research and showed that, I think, three-quarters of 10 to 12 year-olds had social media accounts. Did you also do any research as to whether they had parental consent for that?

Alice Webb: No, we did not. That was not part of our research.

Earl of Caithness: Moving back to the first question then, if we are going to have an age of 13, how are you going to enforce it? Is it enforceable?

Alice Webb: It is incredibly difficult. I can tell you how we do it at the BBC, if that is helpful.

Earl of Caithness: That is a good start.

Alice Webb: I can tell you what we do. First of all, we have an active policy that we do not engage with anybody on social media who is a

child. The verification of their age obviously sits with the platform provider, but if they interact with us and we have any hint of the fact that they may be a child we will not engage with them. We actively do not do that. That is our policy there. We have to get parental verification for children who then come to us at the BBC for sign-in to the BBC. For a child who wants to come to the BBC and have an account with us, we e-mail their parents, and their parents, under our new system that has just come in, already have to have an account with the BBC, and we link them to their parental account. It used to be that the parent simply had to verify, go on to their own e-mail and say, "Yes, I am happy that my child has an account". We have moved that further to make it harder and to close some of the loops between a child sitting there with another inbox going, "Thank you very much", and hit that as well. That is how we do it at the BBC as we are always moving on and making sure that we try to find the right safeguards.

Earl of Caithness: You have just been transposed to being Secretary of State and you are going to introduce a Bill. Minister, are you in that Bill going to recommend that everybody else uses the BBC's standard for checking on 13 year-olds? That is the first part of the question. The second part of the question is: are you also, as Secretary of State, going to put a time limit on what you were saying earlier about apps and play games being too long or going on to charge a bit more money? Are you going to put a control on that, and how are you going to work it if you are?

Alice Webb: I will answer your second question first, if I may. I am not going to put a time limit on things, because content is different and the quality of content is different, just in the way quality of food is different, and it is about what you consume. It is too easy for us to stick to a time limit and to feel that we have done the job. It is about the quality of the content, the interaction that children have with that content and the parental supervision. My worry is that with a blanket restriction we then allow people to step away from the supervision of children and their overall education, so I am not going to do that.

On the first question, I do not feel qualified, as Secretary of State, to decide whether others should. I can only tell you what we do, and that is why you will find the BBC may not be the fastest to market. We may not have the fastest moderation, but we will always err on the side of caution for children in this space.

Earl of Caithness: That is what is so important to us in the Committee. How do you get that spread more widely?

Alice Webb: I think it is by this important work, raising public awareness of the issues out there. We must make sure that children have access to high quality content. In the digital world it is not just about the kinds of content. It is the distribution of content as well. If you go on to a connected television now I can tell you if you are, for example as I am, a Sky user, it will take you 11 clicks at minimum to get to CBeebies; sometimes above 20 clicks depending on where you start. It is making

sure that we still allow children to have access to this content so that when we do not have those time limits, which I think are a false economy, they have access to free-from-advertising, UK public service high-quality content.

Lord Gilbert of Panteg: You describe the sort of process that you take to make sure that you are not engaging through social media with anyone under the age of 13 coming to you from other social media platforms. Can you tell us how that works? Is it a technological process? Do you have some process that enables you to do that or is it very labour intensive? It seems that it must be one or the other.

Alice Webb: Everything that we do is labour intensive, absolutely. That is why I say that we may not have the widest breadth of everything because we pre-moderate. If somebody posts on our website, we moderate that first with human eyes looking at it. A child cannot even sign up with a user name and inadvertently give a name that might indicate who they are because we will pre-moderate that. The same with the way that people interact with us on our social boards. There are people at the other side of that who look at it and worry, not just about whether we think you are a child but do we think you are an adult posing as a child? Do we think there is anything that gives us any cause for alarm? We will act on that.

Lord Gilbert of Panteg: So the answer is basically very intense moderation?

Alice Webb: Intense moderation, absolutely. We, like others, look to see how technology can come behind us with that, because we will always want to stay as relevant and as close to the front end of children's interaction as possible. We are not simply saying we will be a cottage industry forever, but we will always put that line of human intervention in as well.

Baroness Benjamin: CBeebies and BBC Children are the most trusted if you ask any parent, and you have heard from our Chairman, when he first introduced himself, that his grandchildren watch CBeebies because it is a trusted brand. What can you do to make parents feel that you are a trusted brand when it comes to online content and for other people in the industry to follow what the BBC is doing? What can you do to headline, apart from raising awareness, to say, "This is what we are doing that is different from everybody else"?

Alice Webb: I guess a few things. One is by completely bringing all our standards to bear in our online content as well as our linear content, by playing an active role in the industry, making our voice heard, and I have mentioned a few of the ways that we are doing that already. One of the things that we are doing as the BBC is the global children's media summit next year in Manchester. This is something that happens every three years. The last one was in Kuala Lumpur and next year it will be in Manchester, hosted by the BBC, specifically looking at children's media in the digital age. That will bring together content makers, platform

providers and policymakers to specifically raise this and make it more of an issue; to continue to build public awareness; to continue to showcase the good things, the best practice that I believe we follow, and there are others out there too; to use our convening power to bring some of the highest level parties from the west coast of America to these shores to have these conversations. Many of the answers lie over there with the way that digital is international. I do not think there is one thing that we can do, but we will continue to push in every way we can.

Q78 Baroness Kidron: I think you have answered this question in fragments in answer to other questions, because you have mentioned the phrase “critical awareness” several times. The evidence that was put forward said that advertising messages about how services are funded and, therefore, whether they are being sold to, and about the extent to which they can trust information, which is what Floella was just talking about, are relatively low among children. I am interested in who you think has responsibility for making sure that children know, which is a slightly different question. Who should be labelling things in a very transparent way?

Alice Webb: It is a really good question, and I think that platform providers have a huge responsibility in this space. They are just that, the platform. They provide the stage by which these items, these people and these games stand on that platform. I think they have a responsibility to be transparent and clear about the basis on which they stand on that stage. I am sure that does not catch it all, because one of the great advantages and disadvantages of digital is that people can start their own. The new outlets and new apps come so quickly and it becomes very difficult, which is why it is not an easy problem to solve. I cannot help feeling that there are significant platforms out there that are well established, that have more to do in that space in transparency and making sure that they are allowing children to exercise their own choice, their own critical awareness.

Baroness Kidron: On top of that, a lot of the time when we demand those sorts of behaviours, people scratch their heads and say, “This is technologically very difficult”. Would you care to tell us whether transparency, terms and conditions, pointing out what an advert is and so on are technologically difficult or whether, like the answer you gave my colleague just now, it is about the effort you put into doing it?

Alice Webb: There will always be a gap between technology and behaviour, and that is where you have to invest the money and the human effort to go through it. If what you want to do is to provide technology all the way up to the human eyeballs, there are always going to be gaps. The net is never going to be closed enough. It is about effort and prioritising, and I believe that it is possible to bridge any gaps between what technology and algorithms and all the rest of it might give you with human effort.

Baroness Kidron: One last little question, which we have not really touched on. I know the BBC does an awful lot about education, but do

you feel that you are doing enough to explain the internet itself? You just used the word “algorithms”, but most of the young people I talk to think of them as “neutral” and, as we know, they are designed to determine people’s behaviour. Is that something that you in your capacity as teacher/informer—

Alice Webb: It is a really good question. We cover some of those areas. “Absolute Genius” was a show specifically designed to unpack those ideas. This goes back to my Forth Bridge analogy. We can absolutely do more of that, and I will take that away and have a look at it, too.

The Chairman: Alice, colleagues told us that you would bring us all kinds of really useful and positive stuff, and you have, so thank you very much indeed for spending an hour with us. It is much appreciated.

Alice Webb: It is my real pleasure and, as you can tell, it is something that I feel strongly and passionately about. It is a huge responsibility on all of us for children, so thank you for giving me the opportunity to come and talk to you.

The Chairman: Thank you very much.

Examination of witnesses

Tony Close and Lindsey Fussell.

The Chairman: Thank you very much indeed for joining us, Lindsey Fussell and Tony Close. I am going to ask you to introduce yourselves and tell us a little bit about yourselves and where you are coming in on this question of children and the internet. I will start with you, Lindsey.

Lindsey Fussell: Yes, of course. I am Lindsey Fussell. I am the consumer group director at Ofcom, and in this context I look after Ofcom’s market intelligence and market research functions through which we conduct most of our media literacy research, including into children’s internet use.

Tony Close: My name is Tony Close. I am Ofcom’s director of content, standards, licensing and enforcement. I look after a broad range of the enforcement areas of Ofcom’s work related to television, radio, video on demand and any work that we have in relation to internet protection and audience safety.

The Chairman: Great, we look forward to your contributions, starting with a question from Baroness Kidron.

Q79 **Baroness Kidron:** I wanted to ask a couple of questions. The first is very general, just for those who have not read your submission in its entirety. Could you tell us the high points—what you think is important

about the changes in the media use of young people?

Lindsey Fussell: Of course. I will start by saying that our written submission drew on the 2015 research and our qualitative and quantitative research into children's internet use. In the next couple of weeks we will publish our 2016 reports, so in answering this question I might draw on some of the updated information if that would be helpful.

Baroness Kidron: Fantastic.

Lindsey Fussell: Of course, you will have the reports shortly anyway. So, three points. Looking at our 2016 research, I suppose the high point is that children's internet use continues to increase across all age groups from three right through to 17, typically by about 75 to 90 minutes a week. If you like, the proportion of children using the internet has not particularly changed but the amount of time continues to grow. As a result—and I imagine this may catch some headlines—children from the age of five to 15 are now spending more time online each week than they are watching television, and that is the first time that we have observed that trend. It is particularly driven this time by an increase in eight to 11 year-olds going more online than watching television. That is the first thing.

The second point that we note is that the growth of portable devices among children continues to rise with increasing child ownership and usage of both tablets and smart phones to access the internet. From the qualitative research, what we see from that is perhaps an increasing division of children accessing child-orientated content on those kinds of devices on their own and television increasingly being more of a sort of family-orientated viewing activity than perhaps it has been typically in the past where we have seen children watching a lot of child content on television as well.

The use of portable devices obviously has a number of implications, some of them quite interesting. Clearly, it does, I would say, increase some of the risks around children accessing the internet on their own, less on the laptop in the family living room, and that having some implication for the level of supervision. From wider research, it also has some implications for children developing the necessary digital skills, which you tend to get through using laptops for the future world of work and so on, which we can explore if you are interested.

The third point I wanted to make—I am sure we will talk quite a lot about some of the risks of the internet for children—is that it is probably worth saying that about two-thirds of parents continue to say that they think the benefits of the internet outweigh the risks and that their children achieve a good balance between online and offline activity, if I can put it that way. Children themselves increasingly see the internet as a crucial part of the way that they live. They do not necessarily make a distinction between online and their broader activity in their world. They see that as a critical part of their lives. I will stop there and give you an opportunity to ask any particular points.

Baroness Kidron: That is very helpful. I wanted to bring you to something that may or may not be considered a risk. It is not traditionally on the list, but the evidence that you put forward about critical thinking is a bit show stopping: that one in five young people think that if it is listed it must be true. A very similar proportion do not even think about whether anything that comes up on a search engine is true. Does that give you any cause for concern? Secondly, do you think that we need to act—and who might need to act—more responsibly and perhaps delineate what information is for, such as for advertising, and what the source is?

Lindsey Fussell: Yes, I agree. It is a really important issue. I think it is a source of concern that as children's internet use grows—although there is some evidence, which I will touch on, that they are becoming savvier about the internet—there is quite a distance to travel. We have seen some evidence that far smaller numbers of children—and we are now down to quite a small percentage of children—believe that everything they read on social media is true. Children are now much more sceptical about social media generally, and there is some awareness among particularly older age groups about things like personalised advertising on vlogging sites, which they typically access a lot.

We definitely see some evidence that children are becoming savvier, but the type of evidence that you are talking about remains the same. Only a minority of children across all age groups, although the older children get the savvier they get generally, can still identify a Google ad even though it is in an orange box with "ad" at the top. Similar proportions of children to those you were talking about still think that what they get on search engines is likely to be true. Our qualitative research is quite interesting. We find that children often believe there is some kind of authority figure behind search engines who somehow selects those that are most accurate, which is quite an interesting perception.

I think all that points to the fact that there is a distance to travel here. Clearly, there is a regulatory aspect to this that the Advertising Standards Authority take and they have done some things. I know they banned a recent makeup demonstration video for not making clear the links to sponsorship. I do think that a lot of this is less about specific delineation and more, frankly, about increasing children's understanding through education, discussion with their parents, and so on. As I say, from our research, even where the advertising is reasonably clearly delineated, children do not always pick up what that signifies.

Tony Close: Would you mind if I add one point? It is really crucial, because what this is about is building children's resilience online and building their critical thinking powers. I am a member of UKCCIS. Ofcom is represented on the UKCCIS board, and UKCCIS has recently begun a programme of work looking at children's resilience online, what that means and how you might go about improving it. It is at a very early stage, but I think it will be a really fruitful piece of work. I think the Committee will be interested in its findings.

The Chairman: Very much.

Q80 **Earl of Caithness:** Could I take you on to on-demand programme services and your role there? Are there particular difficulties in regulating this, and do you think that the Communications Act 2003 is now out of date and needs a revision?

Tony Close: That is a great question. Ofcom has been looking after video-on-demand regulation for a few years now, and at the beginning of the year we brought day-to-day regulation of video-on-demand in-house for the first time. It had previously been part undertaken by a co-regulatory arrangement, but we decided that it was a good time to take charge. Our experience is that it is a pretty effective system. VOD services, on-demand services, tend to know what the rules are. There are good levels of compliance within the sector. When there is not compliance, when people breach, we have a good set of tools to take action. We have fined errant providers and we have suspended services, and that has been appropriate. We have directed services to change the way they are behaving, with good results.

One area where it is quite difficult is deciding who is going to be regulated. The scope of video-on-demand regulation is not the clearest situation. It can be difficult to determine who is in scope of regulation and who is out of scope of regulation, and I think that is mainly caused by the fact that is a fairly nascent industry. It is an industry that is undergoing change, and some of the services within the industry that are regulated or are not regulated are very different in character. You have things that are obviously video-on-demand that are like television and should be subject to regulation, but then you have many more niche services where there is a query over whether or not they should be regulated.

Another aspect of scope is determining whether or not services are established in the UK, which is a crucial part in determining whether or not they will be regulated by Ofcom. That can sometimes be very difficult. I do not think that can necessarily be fixed by changes to the Communications Act, but it is a challenge and I think it will remain a challenge for some time.

Earl of Caithness: Can I take you on to a more European context than what we have just been discussing? That is the EU's audiovisual media services directive. As you know, the Commission is thinking of changing that. Do you think that the proposed changes are beneficial? Are they going to help in your role? Could you also enlighten the Committee as to what your thinking is for the future? In two and a bit years' time we might be free of Brussels. How is Ofcom going to work then? Are we going to follow religiously what they are doing across 22 miles of English Channel, or are we going to go our own way?

Tony Close: I will answer both of those in order. The second half is a very difficult question, so I will answer the first half first. On the AVMS directive—sorry, I should check—I am assuming you are particularly

interested in the changes that it is proposing around video-on-demand regulation.

Earl of Caithness: Yes.

Tony Close: The revised AVMS directive on video-on-demand regulation makes a couple of proposals. One is to remove some of the current constraints on who should and should not be regulated. There is the removal of certain important terminology such as “TV-like”, which has the potential to increase substantively and substantially the number of services that might fall within the scope of regulation, potentially further increasing the very tricky judgments that I just spoke about. The second, and perhaps more important, is the proposal to extend some form of regulation to video-sharing platforms, a significant proposal within the directive.

Our position is that the overarching objective is a good one. It is difficult to argue that it is not a good thing to ensure that children are protected when they are online, particularly when they are consuming content on video-sharing platforms. It is difficult to argue that it is not a good thing to try to limit race hate and other forms of hate speech online. My worry about the proposal is twofold. The first is that they largely replicate some of the good practice that many of the larger service providers and video-sharing platforms already do on their own, and to that extent there is a degree of gold-plating or unnecessary regulation potentially.

Another potential issue with the proposal as it is currently drafted is that it might also place quite a significant burden on national regulators. For example, I do not know how easy or appropriate it would be for a national regulator to consider specific individual complaints from members of the public about content that is shared on a video-sharing platform. I am not sure in coming up with the proposal whether or not the Commission did a great deal of research on the numbers, the resource burden that might be involved. I do not know whether the team and I could have to consider hundreds of complaints a year or whether it could be hundreds of thousands, if not millions, of complaints a year. I think that is a challenge.

You asked about Brexit. Ofcom, you will be not be surprised to learn, has no specific view on Brexit. I would say, though, that when the Government and policymakers are thinking about how they manage the impact of the UK leaving the European Union they should put at the heart of their thinking consumers and the communications sector—the second biggest sector in the UK behind financial services, I think, so incredibly important for us—and ensure that we have the tools available, perhaps through new or amended domestic legislation, to carry on doing the job that we currently do under the European framework, including the AVMS directive.

Baroness Bonham-Carter of Yarnbury: I may be in completely the wrong territory, so I apologise to everyone. What powers of regulation do you have over video that is embedded in news pieces?

Tony Close: For example, on a newspaper website?

Baroness Bonham-Carter of Yarnbury: Yes, on a news website. It is just I had a very unpleasant experience coming across something that I did not want to look at. I did not see it, I am glad to say, but I am not quite sure how that content is regulated.

Tony Close: I would like to be able to give you a really simple answer, but I am afraid that there is no very simple answer. In deciding whether or not something falls within the video-on-demand regulated space, you have to assess the characteristics of the service as a whole, which means looking at the broad balance of content that it is offering, seeing how much is text, how much is video, whether or not it is provided as a service for the principal purpose of providing consumers with video-on-demand. That leads to some very finely nuanced judgments on a service-by-service basis. It could mean that one particular very text-heavy site—just pick any national newspaper that has a significant web presence but also lots of video—falls outside of regulation because of the balance of text and video, but another that has a slightly different balance of text and video might very well fall inside the sphere of regulation.

Baroness Bonham-Carter of Yarnbury: Obviously, this is something that children can come across quite easily.

Tony Close: Yes, potentially.

Q81 **Lord Allen of Kensington:** Can I turn to filtering? Somebody came to the Committee and basically said that Ofcom merely asked the ISPs to inform it of their take-up levels. My question is: should that take-up be monitored? Should that be part of what Ofcom would do? Should we be looking at the ISPs being accountable for both the quality and the volume of take-up, and, frankly, is that desirable and/or enforceable?

Tony Close: That is a great question. I have had the pleasure of leading three reports for Ofcom on ISP family-friendly network-level filtering. We published three of them over the last few years looking at the rollout and take-up. Also, independently of that process, we monitor reported and claimed awareness and take-up by parents themselves rather than just relying on the numbers given to us by ISPs. We have seen year-on-year increases in both the awareness of filters and the take-up of filters by parents—or certainly the claimed awareness and claimed stated take-up by parents—to the extent that, even absent information given to us directly by the ISPs, our own research tells us that around two-thirds of parents are aware of network-level filtering, what it does and how it works, and a third of parents across the UK state that they also use it in some form or another. That roughly matches some of the figures that we have been given by ISPs as part of the report preparation process, so we are fairly confident that they were telling us the truth.

Our research also says that ISPs have been fairly successful in raising awareness through things like their Internet Matters campaign, a collective campaign on behalf of all the major ISPs that they put quite

significant funding into. They have been successful in rolling out filters absent any existing external monitoring or external oversight. In those circumstances, and as we see a continued success with take-up, I would query whether there is currently a requirement to have an external monitoring or an external enforcement programme. I think if we saw a tailing off of take-up or even a decrease or some concern over lack of awareness or ineffectiveness, perhaps it would be a question worth asking. At the moment, there is a very positive story to tell about network-level filtering and what ISPs have done.

Lord Allen of Kensington: I was interested in your report at point 5.8 about the differential between 6% and 40%. Your footnote said that it was because of the demographics of the various ISPs. That seems a massive differential, and frankly I am surprised that you say that it can be explained by the differential of the customer base. I have two questions. First, have those at the top end, which looks like Sky, done something different to the others, and are there lessons to be learned there? Secondly, do you think we should have default-on filtering?

Tony Close: I think they might be inextricably linked, those questions, so do you mind if I provide one answer?

Lord Allen of Kensington: Yes.

Tony Close: The first thing I would say is that although it cannot be the only reason, the nature of your customer base is an important factor in determining the extent to which people will take up filters. If you have a customer base that has more parents with young children than another ISP, you are probably going to see an increase in take-up of filters. But let us be clear: the two ISPs that have had the most success with take-up—if success is measured by take-up—are those that have adopted a default-on process. I think it is fairly clear, based on behavioural economics, that people are much less likely to opt out than they are to opt in. Of course, it is a small set of data, but I think the default-on in these circumstances has indicated that it drives take-up.

Does that mean that everyone should have default-on? I do not know. There are still differences in the customer base, and I think it should be appropriate for ISPs to decide how they tailor their products depending on who their customers are. Not everyone will have the same results as Sky. It is Sky that had the most results with default-on. Sky has a very family-focused customer base, and if you are an ISP and you know that you have a slightly older customer base who are less likely to have young children in the house, you might well start annoying or infuriating your customers if you make it default-on.

Baroness Kidron: One of the things that we are looking for is trying to create an ecosystem in the world that is good for children. If it puts a few adult customers out, that is a minor commercial consideration versus taking care of children. We know that opt-out works hugely better than opt-in. Is there not a cultural or social argument that we take care of our young for possibly taking that line of inquiry?

Tony Close: I would not disagree, and I think the facts tell their own story. Default-on does drive take-up. It is as simple as that.

The Chairman: But you are not going to do anything about that knowledge?

Tony Close: Ofcom is not the regulator of internet filters. We have had the pleasure of working with the ISPs to monitor the take-up and are really pleased to be able to witness the positive impact that we think it is having on the child protection debate in the online sphere. There is a question for the ISPs themselves whether or not other ISPs want to follow suit with Sky, whether or not they think that the benefits outweigh the risks to their customer base. It is also for policymakers and for Parliament to decide.

Baroness Benjamin: Do you think there should be legislation?

Tony Close: I do not know whether there is a case for legislation. Based on what we have seen, based on the solid uptake of parents, even with ISPs that do not have default-on, I do not know whether the case is there or not, but other people will have a different view.

Baroness McIntosh of Hudnall: Can I ask a very dumb question to pull this thread a little further? If you have a default-on system and it is universal, how difficult is it to switch it off?

Tony Close: If you know it is on, it should be fairly easy to switch off.

Baroness McIntosh of Hudnall: But if you are going to be annoyed by it, it will be because you know it is on. If you are not annoyed by it, why do you care?

Tony Close: Yes, absolutely.

Baroness McIntosh of Hudnall: I understand that this is not entirely your issue, but just as a matter of interest it feels to a relatively uninformed bystander as though this is making rather heavy weather of what is, in the end, a fairly simple issue.

Lord Allen of Kensington: If it is universal, you tell your customers, "When you get your kit, it is on, and here are the three things that you need to do, fairly simply, to take it off". If we had legislative change, would that move us forward substantially? In terms of new kit, you would also need to address whether they need to do it with their existing customer base. I know from an ISP perspective that is more difficult technically, but it is not enforceable either, provided that you communicate with the customer.

Tony Close: Apart from agreeing with you all, I think the facts tell their own story. Default-on drives uptake. It is a factor in driving uptake, but you cannot argue with the numbers.

Lindsey Fussell: It may be worth adding that having to switch my parental filters back on, having just changed provider, even if you want them on, engaging with the system is a good idea because most filtering systems will have different levels within them and different decisions to take. Of course, I absolutely accept that you may well want to have a basic level as a default-on system, but as a consumer, to be certain that you are blocking what you want to block and not blocking what you do not want to block—and most parents think the filters are getting blocking right—a certain level of engagement with the filter is a good idea to make sure you get that right.

Q82 **Lord Sherbourne of Didsbury:** Can I broaden out the question about parents trying to manage online safety for their children? Paragraph 4.4 of your submission is packed full of statistics, and I am trying to understand what they mean. In particular, can you deduce from the huge amount of research you have done what proportion of parents do not know what to do? I could not work it out myself.

Lindsey Fussell: What our research indicates, and I accept as charged the statistical heavy nature of it—

Lord Sherbourne of Didsbury: It is not a criticism. I am trying to work out, as I said, how many parents either do not know where to get information or do not have the information and so are bereft of being able to do anything to help.

Lindsey Fussell: We see evidence that parents are accessing a huge wealth of information about this and are actively in increasing numbers talking to their children about it. The latest research indicated that about 85% of parents said that they had spoken to their children about internet safety in the past year. Interestingly, 95% of children said that they had discussed internet safety. That is interesting, because sometimes children and their parents do not tell us the same results in these circumstances.

Lord Sherbourne of Didsbury: Can I interrupt? On that, the children may know much more than their parents.

Lindsey Fussell: Indeed. I was going on to say that we see that parents use a variety of methods in helping their children access the internet and stay online, and that includes discussion rules, filtering that we have just been talking about, and supervision. We see parents saying increasingly that they are using all of those.

This year, for the first time, we asked parents where they got their information from and we gave them a selection of 10 places as to where they got information from about the internet and their children. You will not be surprised that their children themselves did feature on that list, but we see that most parents are turning to schools and to various other what they see as trusted sources, which can be family and friends but also information on websites and so on. I think there is some really good information out there. Tony has referred to Internet Matters, which I think is a great campaign that brings together a real wealth of

information. We also work very closely with a charity called Childnet, which does a great job at getting more resources out to schools and to parents.

I think it is one of those things that for parents is not perhaps front of mind every day. They do not sit there and think, "Today I am going to find out about child online safety". They do not go to a single place and say, "I am going to educate myself". They use a wealth of information and a wealth of sources to pick up what they feel they need, and they talk to their children. They apply different rules for their children on an iterative basis rather than, "This is the week I am going to talk to them about it". I do not think we see much evidence that parents do not know where to turn for information. While undoubtedly there are some parents who are not yet talking to their children as much as others, there is evidence that in increasing numbers parents do talk to their children on a very regular basis about internet safety.

Lord Sherbourne of Didsbury: I understand that whole range of different sources that parents go to. Would it be helpful if there was one place where you could direct parents? Rather than hoping that they will find their way—and obviously the majority do find different sources, schools and family and so on—if there was a central information place that could be signposted when people buy kit and so on, what would be the downside of doing that?

Lindsey Fussell: I am not sure there would be a significant downside. I think we would probably say that the evidence suggests that it is probably not where people would necessarily turn. It is perhaps just not the way people access information now. They do not turn to a single place that they see as trusted, even if it is a government website or something like that. People tend to use a range of sources every day—the people they talk to, the things their children tell them when they come back after an online safety chat at school and so on—to gather information and ideas about what to talk to their children about and what rules to apply in their internet usage. I certainly do not think there would be any harm in more central gathering, but I am not sure that we would necessarily see parents turning to it in droves.

Lord Sherbourne of Didsbury: Do I infer that one of the best things to do would be to encourage schools to do more and more?

Lindsey Fussell: Certainly our research suggests that over half of parents of school-age children in increasing numbers will look first to schools for information about online safety and then, as I say, from family and friends, from internet service providers and on down the list.

Baroness Kidron: May I quickly ask about the quality of information as well as the availability of it? One of the things we are discovering is that there seems to be a huge emphasis on content, on bullying and on certain aspects of safety, but the sort of knowledge that may be an algorithm might not be neutral—the sorts of things we were talking about right at the beginning—

Lindsey Fussell: The critical thinking, yes.

Baroness Kidron: —or, indeed, that when your app refreshes your GPS automatically goes on so everybody knows where you are, those sorts of things that have huge implications on safety are very poorly represented in the whole gamut. Would you like to comment on the quality and range of what is available as well as the multiple sources?

Lindsey Fussell: Yes, that is a fair comment. Probably a lot of child safety online started, quite naturally, with concerns about content, online bullying, hate speech and that kind of thing, which we have talked about and which children might see, and about safety and children sharing personal information about themselves and explaining to children that people are not always who they see on the internet. All those concerns are entirely natural and probably first spring to mind for parents and tend perhaps to attract the most media coverage.

I think it is fair to say that they have potentially swamped some of the more important information on critical thinking. Certainly, some of the work that we have done with Childnet and others is increasingly exploring fact sheets and other things that we provide to schools, and we need to talk to young people about that kind of critical thinking in a much broader way, recognising advertising and the sharing of personal data in a much less overt way than has been done previously. It is fair to say that that is a space where more could be done to encourage greater understanding.

Baroness Kidron: Is Ofcom willing to look into advertising some of that?

Tony Close: Maybe not advertise but—

Baroness Kidron: I do not mean advertise. I am referring to the extent.

Tony Close: Yes, absolutely. I think we probably do it already with varying degrees of success. I mentioned our role on the UKCCIS board earlier. In addition to being a board member and leading a number of the groups, we also provide all the information and all the media literacy work that we do in this area, including our work on critical thinking—and you are right, there is not a lot of other information out there—to the evidence group and try to ensure that it is socialised with the kinds of industry players and non-industry players that have a direct relationship with children and with parents. I do not know how successful that process is at the moment, but it is certainly something that we are working on.

Baroness Benjamin: Do you think that is the reason why more parents are engaging with finding out more information about how to keep their children online? Why are there suddenly more and more parents being proactive?

Lindsey Fussell: Obviously, it is difficult to say, but I would guess that it is driven by the increasing amount of time that children are spending online in a way that is perhaps less visible to their parents. As I say, the switch from more traditional TV viewing into access to the internet via portable devices is encouraging more parents to feel that they need to

take an active interest in what they are doing and to talk to their children rather than relying on perhaps more active supervision at all times.

Tony Close: I think it is worth adding that our own research on parents' resilience or parents' critical thinking or understanding of the risks of the internet indicates that over the last few years we have seen more parents using the internet more often to do more things and that there is an increased awareness of the risks of the internet. I was quite startled about four or five years ago to see some of our research that showed that parents thought that television was more dangerous for their kids than the internet. That is not the case now. I think it is that level of awareness that plays a role in driving parental engagement.

Q83 **Baroness Benjamin:** I spent some time at Ofcom, and I have heard it said that Ofcom always shies away from regulating the internet, but you have announced that you will be working with the Information Commissioner's Office to regulate the internet of things. Does this indicate a change in policy to greater intervention in the regulation of the internet in the UK? Perhaps you could tell us what internet of things means.

Tony Close: I am going to begin with an apology. Neither Lindsey nor I know a great deal about the internet of things. There are lots of really bright people at Ofcom and many of them know about the internet of things, but we do not really. I will do my best to provide part of an answer. If you are not happy with my answer—and I suspect that I will not be able to cover it in sufficient detail—I will commit to ensuring that we will ask someone who knows what they are talking about back at Ofcom to provide you with the relevant information and the relevant answer.

The starting point for my answer is, no, I do not think this signals a change in our attitude towards being the internet regulator. I think it indicates that we think that we can play a crucial role helping people who are the primarily responsible organisation, such as the ICO, when it comes to data privacy issues online. We can help them with our resource and our understanding of the internet, the technology and the issues facing consumers. We can collaborate with them, the Government and other agencies to ensure that they come to good outcomes for consumers.

Our formal regulatory role in relation to the internet of things is probably quite limited. We are very interested in ensuring that it does not have a potentially negative or dangerous impact on the management of spectrum, for example, but has a clear regulatory role in ensuring that our management of spectrum on behalf of the Government is not impacted upon by wireless devices that facilitate the growth of the internet of things. I do not think that in and of itself is a signal that Ofcom is ready to change its tack and become the internet regulator, but we are absolutely ready to ensure that we can help people do a great job protecting consumers in relation to the risks associated with the internet of things but also to ensure that people understand the benefits as well.

Baroness Benjamin: Why do you not feel you can be the regulator of the internet? What sorts of challenges do you think that will bring that you will not be able to cope with?

Tony Close: That is a really big question. Being the regulator of the internet is not just one thing. The internet is many things. Ofcom currently regulates 2,000 television and radio services that span the globe. Ofcom regulates fixed telephony, mobile telephony, the airwaves, the post, and we are just taking on the BBC, which will be the most significant cultural change and change to our remit since we began 13 years ago. My fear about being the regulator of the internet in any guise is that it fundamentally jeopardises our ability to carry out all our other duties with a degree of effectiveness that I think everyone round the table would expect us to. I think it is as simple as that.

Baroness Benjamin: Do you have anything to add?

Lindsey Fussell: No, not at all. I think it is a huge issue, but if, as Tony said, you want us to provide more information specifically on the internet of things we are very happy to do that.

Baroness Benjamin: I think it would be helpful to us to know what the internet of things means and whether it feeds into our concerns on children. We need to drill down to find out if people can infiltrate into an area where they should not be by hiding behind these sorts of things. That is what I am trying to get at.

Tony Close: Do not get me wrong; the obvious issue, certainly for us and for you, with the internet of things is the data privacy issue, which has a particular child focus. Nobody wants an environment where people are able to snoop on children, abuse the trust of children and use, analyse and distribute their data in a manner that is unsavoury. The Information Commissioner is the existing regulator for data in that sphere. What we would hope to do is help them carry out a great job in regulating privacy of data.

Baroness Benjamin: How will you be helping them?

Tony Close: I will come back to you with an answer.

Baroness Benjamin: Yes, because we are really interested to know. This is not flippant but something that we really need to understand. We need to understand the role that you will play and what the internet of things means, because it is a broad picture and if people do not look at this it can be harmful to children.

Tony Close: I am happy to commit to providing more information on that.

The Chairman: More to follow.

Q84 **Lord Gilbert of Panteg:** We look forward to that information. Could I turn to social media? From your evidence, do you have a view as to

whether the age limit for signing up to a social media account should be 13 or 16? In any event, is it an academic question? Is it in any way enforceable? We have just heard from the BBC, which does an amazing job of monitoring how young people engage with them through other social media platforms, but it is massively labour intensive. It is very intense monitoring and moderation. Is there any other route for either enforcing or monitoring the use of social media by young people?

Lindsey Fussell: Perhaps I will say a bit about research and what that indicates, and then I will hand over to Tony to talk about regulation and enforcement.

The first thing to say is that latest research indicates fairly stable but with some increase in children's social media use. Around a quarter of eight to 11 year-olds and around three-quarters of 12 to 15 year-olds have a social media profile. Facebook is still the most likely one, although we see increasing use of Instagram, Snapchat and so on. Quite interestingly, we did a bit more work on this this year and it is not a flat curve. There is a very sharp uptake of social media at certain ages, particularly at 10 and around the 12-to-13 mark. The 12-to-13 mark certainly indicates that that 13 year-old barrier is quite well understood. The 10 mark is perhaps somewhat harder to decipher.

The qualitative research suggests that many children, whether they are under or over 13, are signing up for these sites with parental knowledge, so not necessarily all of this is going on without parental consent. I think that indicates that the 13 year-old limit or cap is quite well understood—and certainly sites like Facebook do a lot to try to enforce it—but also that children themselves see social media as an increasing part of the way they interact with others. I suppose what we see now is increasing use of group chat services, and children will talk about that as the way they talk to their friends, do their homework, live their lives. In other words, what you are regulating is perhaps quite a lot more about behaviour and culture than something that is a bit more rules based. Tony, you might want to say something about regulation.

Tony Close: Could you be a bit more specific about the regulation or enforcement aspect of the question?

Lord Gilbert of Panteg: I am thinking about whether organisations that engage with young people through social media are heavily moderating. The BBC told us that they moderated very heavily and if they have an inkling, I think they said, that somebody is under the age of 13, then they do not engage with them through social media. You just mentioned Facebook. At what point is the enforcement in place? Is it at the point of sign-up? Do they have any due diligence process or is it through moderation and deriving an inkling that somebody is under the age of 13?

Tony Close: My understanding of the practice is that it varies significantly from provider to provider. Facebook is probably an example of best practice, although it does a lot of its quality assurance, to put it

another way, through moderation. A number of other service providers are not as proactive in probing the consumers that use their services. The BBC is obviously a great example of a socially conscious organisation that will go to great length to ensure that they are not interacting with people under the age of 13.

I am struggling with imagining what an enforcement or regulatory regime might look like. I think it would have to attach to the protocols or principles of practice that you have in place as opposed to a monitoring or enforcement of your specific interactions with the millions of individuals that you might have on your service. I am not sure what an effective enforcement regime would look like, but I know that there are models of great practice out there. Facebook is one, the BBC is another. It is not universal, but a number of social media providers could learn from their peers.

Lord Gilbert of Panteg: Is that an area that you would explore—educating providers in the gold standard that you say is provided by the BBC, Facebook and others?

Tony Close: It is an area that we have had a bit of experience of recently and we have had the privilege to be involved in. Last year I think it was—it may have been the year before—the then Secretary of State asked us to lead a specific working group on best practice guidelines for social media providers, which enabled us to get lots of social media providers around the table, and people with an interest in child safety online in particular, to come up with a set of principles and guidelines that represented best practice, borrowing heavily from some of the really good practice out there but also coming up with what we think is a consensus of what represents good practice.

Having published those guidelines for social media providers, we have spent the last year finding novel ways to hit start-ups, new services, services that have not already got the systems in place to ensure that they are properly moderated, to ensure that they are dealing adequately with young customers, to socialise those best practice guidelines, to ensure that people build them into their business case when they start thinking about a social media business. There are lots of great examples out there and there are lots of great examples of not so good practice that people can learn from as well.

Baroness Kidron: I am sorry to pick up on this, but the stats show a quarter of eight to 11 year-olds, who are clearly under the age of 13, and then however many others. We are talking about millions and millions of children who are under 13 regularly with a Facebook account, with or without their parents' permission, yet Facebook is the gold standard. I am hugely sympathetic to Ofcom for not wanting to get into this space because it is so enormous and the capacity argument is pretty enormous. But we are then left with ICO with the data, you with a little bit of the education, and millions and millions of children using these services—I do not know whether it is illegally or at least services to which they are not supposed to be signed up—and no regulatory presence. I am just curious

that we are selling Facebook as the gold standard, there is no regulatory presence because of capacity, and it is all rather haphazard. I am not saying whether anything is right or wrong here; I am just beginning to grasp a picture that seems unsatisfactory. Obviously, you cannot fill the gap if it is not your responsibility, but I am interested to know from you whether you are prepared to say there is a gap. This seems a yawning gap, to my level of understanding.

Tony Close: Am I prepared to say that there is lots of good practice out there? It is not always well co-ordinated and it is not perfect, absolutely. More needs to be done to ensure that not just social media providers but more online platforms, more online providers, behave in a consistent manner in the interests of their customers. Absolutely, lots more needs to be done. While I describe Facebook as the exemplar or gold standard, they do so many good things. They are not perfect, but they do so many good things to ensure that their customers—

Baroness Kidron: No, I recognise that they do some very good things and are absolutely brilliant about bullying, for example. I understand that, and I am not anti-Facebook at all. I am just interested how they can be an exemplar if they have tens of millions of underage users. That is just a bit difficult for me.

Tony Close: No, I appreciate that. My final point would be that they are not perfect, but they try hard to ensure that they have decent guidelines in place and that consumers understand what they can expect from Facebook. There are social media providers out there and other online providers that do not really bother to do that. They do not have the presence or size of Facebook and they can learn from them. I feel as though I have mentioned Facebook too many times now. There are other fabulous social media providers.

Baroness Kidron: No, and to be fair I am not interested in Facebook either. I am just saying that there is a gap of provision or regulation for the millions of children who are using things under age. That is a much bigger issue, not one or the other service.

Lindsey Fussell: It is probably worth saying that we ask children whether they have a social media account. I am not suggesting, by the way, that none of those children have Facebook, but some of them will say yes when what they mean are the types of accounts that are reasonable, that are effectively very heavily constrained spaces that are suitable for children under age, and many of them would certainly probably say that their mum or dad had agreed to them using either that site or one of the other sites. I guess from a Facebook perspective, or indeed any social media site, that if parental consent has been given and they go on to moderate and try themselves to pick out anybody who is under the age of 13, it is quite hard to know what extra provision they could put in place to try to prevent children who are under the age signing up to those sites.

Lord Gilbert of Panteg: Are you aware of any really powerful

moderation tools—the BBC depends very heavily on human moderation—that are enabling providers to identify potential under-13 year-olds using their platforms?

Tony Close: I think the providers themselves would probably be better placed to explain the technology behind it, but it is worth saying that many of them still rely on banks and banks of human moderators, which is obviously not without its faults.

The Chairman: Do you not have any idea what proportion of the three-quarters of 10 to 12 year-olds who have social media accounts have had parental consent for them?

Lindsey Fussell: No, we do not. I should say that the three-quarters actually referred to all the children—the 11 to 15 year-olds—which will obviously encompass a good proportion of children who are 13 and over.

Baroness Kidron: Might I suggest to Ofcom that they count to 13 next year?

Lindsey Fussell: Yes.

Baroness Kidron: I am not even in particular favour of the COPPA law that says 13 or of banning children. I am just saying that if that is what is in place, should we perhaps count to that place?

Tony Close: That is a good point.

Lindsey Fussell: We certainly can look at that.

Q85 **Baroness McIntosh of Hudnall:** I think some of what I wanted to ask has been covered one way and another by the way the questioning has gone in the last 10 minutes. What I am hearing—please correct me if I am wrong—is that Ofcom, for perfectly sensible and understandable reasons, is continuing to shy away from the notion of having any explicit regulatory role in relation to these platforms and a number of other things to do with the internet. But I am also hearing you say, “We know there is lots of good practice out there and we are trying to get people to talk to each other so that that good practice can be disseminated”. That is “regulation-lite” to say the least, but it does imply that you recognise that you are in a very good position to provide an overview of practice that can be shared. You may want to challenge me about that, but I am not going to let you this second. However, it has been put to us by more than one witness that Ofcom should have the power to regulate in the sense of requiring online platforms to reveal their working practices so that it can be verified that they are transparent and that the practice is as good as it can be. I sense that you do not want to have to do that, and I understand why but, leaving aside the resource issues, is it desirable and can it be achieved?

Tony Close: Okay, I will leave aside the resource issues. I find myself in this odd position. Each day I come in and I am responsible and deeply committed to ensuring that different constituencies of people are

protected from bad things. That is my job and that is the job of all the people who work with me. That is their noble purpose each day when they come in. I do not want to come across as flippant or not conscious of the significant risks to the most vulnerable in society presented by the internet, but I find myself cast in that role as we have the discussion today.

I am not going to talk about resource, but I am going to talk about a couple of things. The first is that although Ofcom is not and does not want to be the regulator of social media or the broader internet, that is not to suggest that providers in this area are wholly unregulated. That often goes unspoken. There are a significant number of constraints on their behaviour, not all relating to child internet safety, but some of them are linked. They are subject to data protection provisions. They are often investigated and the subject of successful investigations. They are subject to a number of obligations relating to otherwise unlawful content, not just copyright but child abuse images and other unlawful content. They proactively engage on a voluntary basis with a range of agencies that all have a role in ensuring that some kind of consumer good or protection for the most vulnerable is achieved.

It is not just that they have good practice in place. It is that they are, in fact, also bound into a number of obligations. They are not unconstrained, swirling around wildly causing untold damage to people, and if they were I think the case for regulation would be much stronger. It is in part because they are constrained, there are checks and balances on their behaviour and they proactively engage on a voluntary basis to ensure better outcomes for kids and other vulnerable consumers that I do not think the case for regulation is as strong as it would be. That is why I do not think that Ofcom should regulate it, because I just do not think the case is there.

Baroness McIntosh of Hudnall: By the way, I hope you do not go away feeling that you have been cast in the role of somebody who does not take this seriously—on the contrary. If I have understood what you just said, you not only do not think Ofcom should regulate, you think that it is not necessarily a good way forward to think of any further regulation in this area.

Tony Close: At the moment, yes. At this time, based on my understanding of the existing constraints placed on these providers and their willingness to engage and submit themselves to further constraints and good practice, I do not think there is a very, very strong case for regulation in this area at the moment.

Baroness McIntosh of Hudnall: You are saying that there is a significant quantum of good will, which is already operating to moderate some of the harms that might ensue?

Tony Close: Yes.

Q86 **The Chairman:** We are more or less out of time. I will try a couple of

quick questions in case you have something very significant to add to the excellent presentations you have made already. Some people have told us that, in respect of its age verification provisions, the Digital Economy Bill should give a regulator, not necessarily you, the power to require that access to non-compliant sites should be blocked. How do you react to that?

I will throw you the other question as well. Either or both can take one or the other. What about the famous EU net neutrality regulation that we keep hearing about? Could that have an impact on content?

Tony Close: It is helpful. They are linked questions and I will tell you why. You will not be surprised to learn that we do not want to be the regulator of age verification for a range of reasons, but we do recognise that at the heart of this proposal is a rock solid foundation, a public policy objective to protect the most vulnerable in society from harmful sexual material. Again, that must be a good thing. We are also really pleased that the BBFC, a very trusted partner of ours with a great deal of experience in content assessment and working in the online arena, has agreed to play a crucial role in this. I think that is a really positive step.

There are some challenges with the scheme as it is proposed. We responded publicly to the Government's consultation earlier in the year, and we pointed out that, for example, the scheme does not require ISPs to block on a firm statutory footing. If ISPs were to take any action blocking non-compliant sites, they would do so on a voluntary basis. That is quite tough to enforce, but it also puts ISPs in quite a tough spot. I think you might have heard from ISPs about the legal difficulties they think they would face if they were to undertake voluntary blocking to secure compliance in this area: that it would raise issues in relation to net neutrality. I think we agree with the points they have raised. A big challenge with the current proposals around age verification centres on the ISP's role, which neatly leads me to your other question.

The EU regulation on net neutrality limits the circumstances in which ISPs can block content. What it does not do, though, is render ineffective many of the other excellent measures out there at the moment. It does not impact on the network-level filtering that we have been talking about today. The reason why we think it does not impact on that is because at its heart consumers are provided with a choice in relation to network-level filtering. They are able to turn them off or turn them on, so it does not suffer from the same net neutrality problems as a broad and mandated blocking program does.

The Chairman: That is a helpful and very clear response, thank you. Lindsey, any final comments from you?

Lindsey Fussell: No. Thank you very much. We are delighted that this review is taking place. It is a really broad-ranging review, but it covers, as we have been discussing, some hugely important issues that we are interested in. We will publish our research in a couple of weeks, but we obviously very much look forward to seeing your report as well.

Tony Close: Thank you very much.

The Chairman: Great. Thank you both very much indeed. Do not worry, we feel you are very much on the same side as we are in all that we are doing. Thank you for coming.