

Select Committee on Communications

Corrected oral evidence: Children and the Internet

Tuesday 15 November 2016

3.40 pm

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Members present: Lord Best (The Chairman); Baroness Benjamin; Baroness Bonham-Carter of Yarnbury; Earl of Caithness; Bishop of Chelmsford; Lord Gilbert of Panteg; Baroness McIntosh of Hudnall; Lord Sheikh; Lord Sherbourne of Didsbury.

Evidence Session No. 7

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Questions 87 – 107

USE OF THE TRANSCRIPT

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Examination of witnesses

David Austin, OBE, CEO, British Board of Film Classification and Malcolm Phillips, Regulatory Policy Manager, Committee of Advertising Practice.

Q87 The Chairman: We welcome Malcolm Phillips, the regulatory policy manager of the Committee of Advertising Practice, CAP, and David Austin, chief executive of BBFC. I have to declare an interest. My brother chairs the Committee of Advertising Practice, CAP. Does anyone else have any declarations?

Lord Gilbert of Panteg: I am a consultant to Finsbury, a financial PR company, which advises Telefónica UK.

The Chairman: Malcolm and David, perhaps you would just introduce yourselves and describe briefly where you are coming from. We have the background in the CV material we have been given, but those watching from the outside—because this is televised—will not have it in front of them.

Malcolm Phillips: I am the regulatory policy manager for the Committee of Advertising Practice, which is the sister body to the Advertising Standards Authority. CAP sets the standards that ASA enforces. The ASA is public facing and takes complaints from members of the public and industry about advertising. The CAP and BCAP committees set standards for advertising in broadcast material through the BCAP code and for non-broadcast material, including online, through the CAP code.

David Austin: I am David Austin, chief executive of the British Board of Film Classification and a member of the UKCCIS executive board. I have been CEO since March this year. The BBFC is the independent regulator of film and video in the UK, and its core mission is to protect children and empower consumers, particularly families, to make informed decisions about what they view in both the physical and online world. Offline, our classifications have statutory force; in the online world, we have developed a number of voluntary best practice self-regulatory initiatives with a range of industry partners, in response to public demand, to bring trust in BBFC standards online. You will have seen that recently we have agreed with the Government in principle to be the regulator of online pornography in the UK under the Digital Economy Bill.

Q88 Bishop of Chelmsford: David, in a moment I may want you to say a little more about what you have just said. My first question is a general one to David. I want to quote from the evidence of the British Board of Film Classification. It says, "it is too easy for children and young people to access inappropriate and potentially harmful content online". A regulatory framework has been developed in the offline world to protect children, but although it is well regulated in the offline world, for the most part it is unregulated online. The general question is: what do you think are the greatest risks to children from online usage, but also what do you think are the greatest benefits?

David Austin: As to the risks, you can probably categorise them in three words: conduct, contact and content. At the BBFC, our focus is very much on protecting children from harmful content, whether it be online or in the physical space. In relation to online, there is a great range of content that could be harmful to children. Many of the offline protections do not exist online. We are working with a number of industry partners to try to provide, as far as possible, those protections online on a voluntary basis. For example, we are working with mobile operators in the UK to set the standard at which content goes behind adult filters. They apply our standards. When you take out a mobile phone contract, the filters are automatically turned on—we issue a default-on process—so parents can be reassured that when they obtain a mobile phone they do not need to think about child protection in relation to filters.

The core of all our online work is to try to bring offline protections online as far as possible. In many areas, self-regulation has worked well, but in other areas, as we have pointed out in evidence and as you said, they have not worked so well. Pornography is a key area where it has not worked well. In 2012, Claire Perry had an all-party parliamentary inquiry into online child safety. I said then that self-regulation could work to a

large extent, but where industry would not engage—that was the case with the adult industry back in 2012—legislation would be required, so we are pleased that the Government have brought forward the Digital Economy Bill.

Bishop of Chelmsford: Before Malcolm has a go at the question, do you want to say anything about the benefits?

David Austin: I forgot about the benefits. I am not an internet evangeliser; I am a regulator. My goal is to protect children. There is a mass of content online that is great for children, and our role at BBFC is to help children access that great content without being exposed to harmful content.

Malcolm Phillips: That response indicates that perhaps the greatest risks to children online are not connected so much with advertising, but, relative to our remit, I think the ASA places particular emphasis on trying to prevent children from seeing content that might distress them or encourage irresponsible behaviour. One example is an ASA ruling on a case involving a trailer for a horror film that appeared on a games site as an ad before the games could be played. The audience for that site had a mixed profile and included young adults at whom the movie trailer was targeted but also younger children, and in that case the ASA upheld the ruling because they thought that too significant a proportion of the website's audience were children who should not have seen the ad. That is an example of the cases the ASA take most seriously because of the direct emotional impact on children.

Q89 **Lord Sherbourne of Didsbury:** Can I follow this up with a question directed to Mr Austin? Your evidence highlighted the fact that most online pornography accessible in the UK is unregulated—you have talked about this already—and this gives children online unfettered access to the strongest pornography. Can you spell out for us in some detail what powers you are being given in the Digital Economy Bill, and how far those powers will help you deal with the problem you have highlighted in your evidence?

David Austin: Would it help if I explain how we think regulation will work under the Bill as it stands? Our role will be to identify the most popular pornographic websites and apps accessed by children. Data is available so that you can see how many children are accessing which websites, so we will target the most popular with UK children. We will then ascertain whether it is pornography, because sometimes that can be disputed. Usually it is obvious if something is pornography, but not always. The first test is whether it is pornography. The second is: does the website or app have effective age verification? That does not mean just ticking "I am 18"; it has to be proper and effective age verification that can identify whether someone is an adult or child.

The second thing we are asked to look at under the Bill is whether the website or app contains any prohibited material. That is pornographic material that is either illegal under UK law or content that we will refuse

to classify—for example, if it is released on physical DVD. That would be material that promotes an interest in abusive relationships, such as paedophilia or incest; material that features rape, or simulated rape; material that features violent abuse of women. This kind of content we will not classify, so we ask to look at the websites to see if they contain that material as well.

If the answer to either of those questions—does it not have effective AV, or does it have prohibited material?—is no, our duty is to notify the publisher of this pornography, wherever they may be. About 93% of pornography accessed in the UK is hosted overseas, a lot in the United States. We then contact that website or app owner to say, “You are acting in contravention of UK law. Please stop”. Since the exchange of letters with the Government, we have started discussing these issues with some adult providers. We are confident that some will obey the law—they have said that they want to obey UK law—but we know that some will not. We think we will get some compliance at that stage, but certainly not 100%.

We then have a second line of approach under the Bill. We are then required to contact the payment providers to see whether they can disrupt payments to that website or app and what the Bill calls ancillary service providers. Ancillary service providers are people such as ISPs, search engines and some social media sites. There is a whole range of organisations that facilitate the publication of pornography in the UK. As the Bill stands at the moment, we notify them, and under that notification we will ask them to withdraw their services. We cannot compel them to withdraw their services; we can ask them to do it.

I believe you heard evidence from Adam Kinsley of Sky that what the ISPs want is a clear legal requirement from the regulator to withdraw their services. That would be helpful to them and they would obey that instruction, but at the moment that is not in the Bill. Therefore, as part of the notification process, it would be helpful, from the child protection perspective, not just to have an ability to notify and request that an ISP withdraws its services and blocks a website but to notify and require it to do so. You have heard evidence from an ISP that it would prefer that. We certainly think it would increase the effectiveness of the Bill quite significantly. We know from our conversations with child protection groups that they would also like that requirement. An organisation called the Centre for Gender Equal Media did some research, published a few weeks ago, which showed that 78% of the public also think there should be a requirement. I am not a gambling man, but I believe that if a major publisher of pornography was sitting at this desk now they would most likely say that, yes, they also wanted to see compulsory blocking.

Lord Sherbourne of Didsbury: That is very helpful. If I were the Minister looking at the Bill and asking myself whether there was anything more I could ask you to do by way of further statutory powers or obligations in the online area, at least as an option, what would it be?

David Austin: We can achieve an awful lot with the Bill as it stands, because I think we can achieve an awful lot of voluntary compliance.

Lord Sherbourne of Didsbury: But in addition to what is in the Bill.

David Austin: In addition to that, if, as part of the notification process, we can require ISPs to block, that would be significant.

Lord Sherbourne of Didsbury: Would that be practicable?

David Austin: Yes. It happens in other spheres. The research on the effectiveness of blocking is pretty strong. There was some research published in the United States earlier this year in relation to ISP blocking for IP-infringing websites—for example, pirated films. The research found that there was a 90% reduction in traffic to those websites as a result of ISP blocking. The evidence published in the Government's consultation on this Bill highlighted that in one month in 2015, 1.4 million British children accessed a pornographic website. That is not 1.4 million visits; it is 1.4 million individual children. If you can reduce that by 90%, that is a significant child protection measure.

Lord Sherbourne of Didsbury: Is there anything else you want in addition to the Bill?

David Austin: The key thing is ISP blocking. That is the most effective measure in our view.

Baroness McIntosh of Hudnall: If I understand that bit of conversation, you are talking of blocking non-compliant websites that would fall outside permitted material. What about young people getting access to material that does not fall outside it? I still do not quite understand how that is going to be dealt with. You seem to be saying that lots and lots of young people access pornographic sites, for example. I imagine that not all of them are outside the law; plenty of them are not.

David Austin: All commercial pornographic websites come within the scope of the law. There are two things they need to do. First, they must have effective age verification. Secondly, they must not contain prohibited material. If they do not have effective AV or they have prohibited material and they refuse to co-operate with the regulator, we would look to the second tier: that is, payment providers.

Baroness McIntosh of Hudnall: You gave a rather alarming number; you referred to 90% of young people accessing this material.

David Austin: The 90% refers to the effectiveness of ISP blocking.

Baroness McIntosh of Hudnall: I see what you are saying.

David Austin: The 90% comes from ISP blocking in the United States. This is US research into ISP blocking of pirate websites. When ISP blocking was brought in to deal with pirate websites, traffic to those websites went down by 90%.

Baroness McIntosh of Hudnall: I understand that, but I am still puzzled by the stat you gave about the numbers of young people accessing this material.

David Austin: These are pornographic websites. This is a statistic I quoted from the Government's consultation document, which they launched in the spring.

Baroness McIntosh of Hudnall: But is that all sites: ie those that do have effective age verification? If so, it is not working. Or are you just talking about the sites that do not have that?

David Austin: I am talking about sites that essentially do not have effective age verification at the moment.

Baroness Bonham-Carter: I have a question about the degree to which it is accidental. The 1.4 million children, which I heard, are not searching for it; they are slipping into it, which is my experience of a young person.

David Austin: That data does not break down whether it is deliberately seeking porn or accidentally stumbling across it. The NSPCC and the Office of the Children's Commissioner earlier this year published research that highlighted the risk of inadvertent access.

Baroness Bonham-Carter: As to that, it seems completely obvious that there should not be the ability to do that. There should not be the ability anyway, but inadvertent access is something that should be looked at.

David Austin: I agree. The key thing that the Bill will achieve is preventing inadvertent exposure. If there is a determined tech-savvy teen who puts a proxy server in the loft, they will be able to access it, but we are talking largely about inadvertent exposure.

Q90 **Lord Gilbert of Panteg:** Can we turn our attention to advertising to children and young people? Therefore, it is Mr Phillips's turn. We have seen evidence that most younger children and many older ones fail to identify advertising particularly in search results. What evidence do you have about the age at which children become better at identifying advertising? If there is an issue, what more can be done to increase transparency so that children and young people are aware of advertising? Can you look across the internet, not just search results but website content?

Malcolm Phillips: This is an issue we are actively considering at the moment. The age at which children start to understand advertising appears to depend on what kind of advertising you are talking about. A lot of the classic studies about children understanding advertising were based on television advertising, but the internet involves greater and more sophisticated capacity for editorial and advertising to intertwine. Therefore, forms of advertising are now less obvious because they are less interruptible and less separated from editorial content.

It is important to note that it is not only children who require clarification where this happens. There are many cases before us about the intermingling of advertising and editorial content to adult audiences. There are also two separate but related issues here. One is the capacity of children to recognise an ad as an ad; the other is the question of children's understanding of persuasive intent, which is something else the studies we have been considering talk about. One needs to recognise that something is an ad, to adopt a more questioning approach and understand the persuasive intent of the communication. This is what we are considering now. We are in the process of developing guidance that we hope will address the kinds of communication where we think children are at greater risk of not recognising advertising and so not being able to activate their understanding of persuasive intent.

Our understanding from studies is that children's understanding of these issues develops most significantly between the ages of eight and 12. Interestingly, by the age of 12, children's understanding of advertising and their capacity to activate that kind of inquiring attitude begins to approach adult levels. Therefore, our guidance is going to focus on communications that might be targeting a younger audience or media consumed by younger children, and the focus will be on what we are beginning to think of as integrated or immersive advertising: that is, virtual worlds or advertising that mimics the website architecture around it, for example on a game site, or advergames. These are all things that have been studied and discussed by various academics working in the field of advertising.

Because of the dynamic nature of the internet, it is not always easy to get a current corpus of material to study: that is, before the eyes of children as you work. We have taken what we believe to be the appropriate time to work with industry to understand what is out there, and what kind of remedies might work for the techniques that are currently in place, because it is not always the same as the kinds of things that have been studied in the academic literature available to us. We hope to have a proposal for guidance towards the end of this year, or early next, to deal with this. It is likely to recommend enhanced disclosure to help children understand more clearly the nature of what they are seeing and explain to them a little more the context of what is happening.

Lord Gilbert of Panteg: Do you think the industry is open to that enhanced disclosure?

Malcolm Phillips: Absolutely. We have conducted working groups with the major parts of industry involved in advertising products of interest to children, such as the toy industry, but we have also worked with a CAP member, the Internet Advertising Bureau, which brings together different parts of the internet marketing industry, including social media platforms, agencies and so forth, to understand the more technological side of things, and we have had great co-operation.

Lord Gilbert of Panteg: You are going to make recommendations that

impact at the point of content and the point at which it reaches children. Do you have recommendations on the role of wider education of children as to the nature of this content generally?

Malcolm Phillips: We collaborate with CAP members on educational resources. Most of the consumer education work is done by some of CAP's partners, such as the Advertising Association, which has a resource called Media Smart. They produce resources that are promoted through contact with schools and educators to try to educate children and young people on the internet and the issues connected with the use of it.

Q91 **Lord Sheikh:** We have discussed children of different ages. We were made to understand by the Internet Advertising Bureau that advertising regulations and self-regulation use different definitions and age-based categories from what we are discussing today. Do you think that the appropriate systems and advertising regulation are in place in regard to content to take into account different ages and stages of child development? Are there sufficient, proper systems in place bearing in mind the different ages of the children?

David Austin: If I may, I will speak first and then let Malcolm talk about advertising. In relation to content generally, yes. We have developed over many years a system for age categorisation. It is the core of what we do. We have age ratings going from U, meaning it is content suitable for everyone, all the way up to adults-only ratings.

Lord Sheikh: Are they in stages?

David Austin: We have developed these different ratings over many years and have refined them.

Lord Sheikh: In other words, it is one to five, or whatever. Is it categorised in that way?

David Austin: Our ratings are U, PG, 12, 15 and 18, and we have refined them over many years, with the help of the public. Essentially, we ask the public every four years. We go out and talk to 10,000 people and say, "What kind of content do you think is appropriate for children at these different ages?" We convert what they tell us into guidelines, and they form the basis of all our classification decisions. We also take input from child psychologists and people who are expert in how children develop from a young age to adolescence and beyond.

In addition to that expert advice, we incorporate advice in our classification policies from people such as the Samaritans, the NSPCC and selfharmUK, who are experts in particular areas. We are quite confident that we have a suite of age ratings. We know from our own research that those are quite well trusted. Eighty-four per cent of parents say that we do an effective job; and 76% of teens, many of whom are frustrated that they cannot see some of the content we have age rated, think we do an effective job and value what we do. We are pretty confident that the suite of age ratings we have developed has public trust.

Lord Sheikh: Is it a moving target? Would you tweak it, for example, depending on what is available?

David Austin: Yes.

Lord Sheikh: How do you do that?

David Austin: Every four years we go out to a major public consultation and look at what issues have arisen over the previous four years. Attitudes towards certain types of content shift. We started doing this public consultation in 1999. If you compare 1999 with 2016, you can see some quite big shifts in attitudes towards racism and other forms of discrimination and towards issues such as self-harm. I imagine that, when we do the next guidelines research in 2017-18, we will look at depictions of transgender issues in the media that were not an issue maybe 10 or 15 years ago. We track societal changes and changes in people's attitudes towards different types of content.

Lord Sheikh: It is important we do that because attitudes change and legislation changes. The legislation now compared with 20 years ago is quite different.

David Austin: Exactly. We track those changes and reflect public attitudes in our classification decisions on different emerging types of content.

Q92 **Baroness McIntosh of Hudnall:** I want to ask you about social media and the difficulty there must be in regulating the kind of material that gets uploaded on to Facebook, Twitter or whatever. I want to pull it together with what was talked about earlier. Mr Austin, earlier you raised the issue of piracy. It has been brought to our attention that a lot of young people use pirate websites and download from them, and those sites often contain advertising, sometimes of an extremely unsavoury nature. Therefore, the general question is: how do you regulate video and advertising content on social media? Do you find that the platforms are willing to engage with you in trying to help that happen? More narrowly, on the issue of sites from which pirated material can be downloaded, do you have eyes on that and any thoughts about how that can be better regulated, or, to be more accurate, regulated at all?

David Austin: In terms of social media, our interaction with them is about to enter a new phase with our role under the Digital Economy Bill. Over the next few weeks and months, we will contact those social media outlets that allow pornography to encourage them to engage with us and see how we can work together to regulate pornography that appears on those social media outlets. We have not started yet; we have only exchanged letters with the Government recently, but we will be engaging with them on that issue.

Baroness McIntosh of Hudnall: Specifically on that issue, one thing that occurred to me when you talked earlier about pornography was the issue of user-generated content. Clearly, as far as social media sites, and pornography particularly in relation to those, are concerned, I assume

that a lot of that will be user-generated.

David Austin: Yes.

Baroness McIntosh of Hudnall: Is that the kind of thing on which you are going to attempt to come to some sort of understanding with them?

David Austin: We will be looking at a range of pornographic content on their websites. In terms of user-generated content more generally, we were part of the CEO Coalition, which was created by the Commission in Brussels to make the internet a better place for kids. We were a third-party expert body on that. One of the things we were asked to do with our Dutch counterparts was to create a tool for age-related user-generated content on social media and video-sharing platforms. We have created that tool and have been trialling it in Italy for the past year. It has worked very well. Next week, we are going to Luxembourg to present to the Commission the outcome of that trial. We will be urging the Commission to encourage social media operators to look carefully at using this tool. It is a simple questionnaire.

The beauty for industry is that, if they operate in many territories, it is a single questionnaire that a member of the public, a crowd or the person uploading the video can complete. The beauty for the consumer is that that single output produces nationally sensitive ratings. So far, four countries are part of this project. In testing it, we have found that the same video content can produce different ratings. We looked at a pro-anorexia video that got an adults-only rating in the UK, but in the Netherlands it got a 12 rating. That reflects different societal concerns and national sensitivities about different bits of content. Therefore, the consumer in the UK, Netherlands or wherever they are, would get a rating they understand and would reflect their sensibilities. For industry, it is a single tool. We have trialled it and it has worked very well. We are presenting the results to the Commission next week, and we would very much like social media platforms and video-sharing platforms to look carefully at using this tool.

You asked about piracy. We were part of a campaign about 18 months ago to highlight to children the risks of going on to pirated websites. They might want to watch a pirated film but there is all sorts of other content. It is not regulated by us by definition; it is a pirate website, and there is a risk of coming across content that potentially could be quite harmful to them. We were part of this campaign. We go to schools around the UK and among the things we talk to students about is how to avoid potentially harmful content online, and piracy websites are places where they can come across content that is very problematic.

Baroness McIntosh of Hudnall: Since you are engaging in that quite actively in trying to bring that to people's attention, could anything be done at a more national level, or possibly even at government level, equivalent to a public health campaign, that would more effectively and widely bring that kind of danger to the attention of more people?

David Austin: There are a lot of campaigns already with lots of people engaged in informing children and protecting them online. We are just part of a much bigger ecological system represented by organisations such as ChildNet and InternetMatters that are set up by the ISPs, Baroness Kidron's 5rights and all sorts of people. A good place for all this work to come together, as it does, is UKCCIS. I sit on its executive board, but there are many members of UKCCIS who are not part of the executive board. UKCCIS has a number of working groups. I have been part of some of them—the BBFC continues to be part of some of those working groups—that look at things like building resilience. How can we help educate children to be resilient when online? What are the technical solutions? What are the educational solutions? UKCCIS brings together regulators, child protection groups, education experts, researchers, industry and government. This is a really good forum for developing helpful tools. I think you heard evidence from Ofcom a couple of weeks ago about the social media guidelines. That was something on which we worked as well under UKCCIS. I think UKCCIS is a very good body for co-ordinating this work.

Bishop of Chelmsford: Do you think it could be done?

David Austin: If you are asking me whether we should create a single portal for parents to go to for everything, my answer is that that might not be the answer. We tried it in relation to something called ParentPort. This was a recommendation by Reg Bailey's independent report on the commercialisation and sexualisation of childhood. One of the things he recommended and government encouraged all regulators to do was the creation of a portal where, if you had any concern about a particular issue, be it advertising—the ASA was part of this—a video game, broadcast TV, film, video or cinema, you could go to that portal, but the experience of all the regulators is that the public know where to go to complain or give feedback. From the BBFC's perspective, most of the feedback from the public continued to come to us directly rather than through ParentPort. We have established mechanisms. There is certainly scope for raising awareness of these, but whether there should be a single place for everyone to go I am not convinced.

Q93 **Baroness Bonham-Carter of Yarnbury:** Advertisers are obviously about building up databases, building brand loyalty and so on. One assumes that, the younger they get you, the longer they have you, as it were. How do advertisers obtain data about online usage, and to what degree are they constrained, or not, by the age of the people they are obtaining data about?

Malcolm Phillips: The CAP code follows ICO guidelines in prohibiting advertisers from collecting information from web users under 12 without parental consent.

Baroness Bonham-Carter of Yarnbury: How can that be possible? I understand the point about prohibiting targeting, but how can you stop data being garnered?

Malcolm Phillips: I think the primary force of this rule is in places where there are online accounts or sign-in, but another important provision in the code relates to online behaviour and advertising where information related to web use is collected through cookies. Third parties, advertising agencies, collect online information about web users by planting cookies on browsers. It is possible in some cases to identify the age of a user by the kinds of interests they display. Our rules say that for interest segments, which are the plans that ad agencies use to target web users with particular products they think will be of interest to them, you cannot create an interest profile for under 12s; you just should not be targeting online behavioural advertising at an under-12 audience.

One of the concerns over time is that the capacity of anyone to identify child web users is imperfect at best, particularly during a period where children's access to the internet was mainly through a shared computer in the family home. One of the interesting positive developments over the past few years is that the increase in the use of smartphones and tablets means that children tend to have their own accounts; they access the internet individually. While that obviously carries risks as well, it does have benefits in terms of making it easier for people to identify a child internet user and modify their targeting accordingly.

In terms of online behavioural advertising, you talk about the idea of getting people early. When we speak to agencies involved in online behavioural advertising, they tend to think of their engagements in much more short-term ways, even when dealing with an adult audience. They are really interested in what any web user is looking for at that particular time when they are online.

Baroness Bonham-Carter of Yarnbury: Really?

Malcolm Phillips: They understand that that changes.

Baroness Bonham-Carter of Yarnbury: They do not have long-term plans.

Malcolm Phillips: One week it might be one thing; another week it might be something else. That is the real use of online behavioural techniques; it is display advertising featuring products. There are other methods of developing brand loyalty in the longer-term relationships you were talking about. Perhaps social media is one of the places where advertisers try to do that, but the information that is gathered and used to target individual web users is much more about individual purchasing decisions on a very quick sequence.

Baroness Bonham-Carter of Yarnbury: I think you are saying that this is imperfect at its best. What is your view of business models that do not rely on advertising? Is that a reality?

Malcolm Phillips: I understand that they exist. We do not take much of a formal position on them at the ASA. I suppose Netflix, or a subscription service for audio-visual media content, would be an example. We tend

not to take a view on those. There are circumstances where a subscription model can rely partly on advertising. I suppose there are examples of audio-visual media service providers that use their subscription information to target advertising to their audience. That is something in which we would obviously take an interest, but I guess we are content to leave alone a service where there is no advertising.

Baroness Bonham-Carter of Yarnbury: It is a good thing.

Malcolm Phillips: We are content to leave it alone.

Baroness Bonham-Carter of Yarnbury: Quite. Are there measures in place to prevent children being inappropriately targeted by advertisers?

Malcolm Phillips: Yes. I think the rules that I have mentioned on online behavioural advertising are relevant. We also have rules that address particular sectors where we think it would be inappropriate for advertisers to target children. We have rules that prevent advertisers from using children's media to promote gambling or alcohol, for example. Those work in tandem with content restrictions that we think mitigate the risk of children coming across those ads in media of broader appeal with a broader audience. It is important to have those two systems in place from our point of view.

Q94 **Earl of Caithness:** Can I take you on to parental filtering controls? We have had a range of evidence. I would be interested to know whether you think that the UK system, which is slightly unco-ordinated, although it is a voluntary system among the four top providers, is a good one. Would you prefer there to be a set system that works throughout all the providers?

David Austin: You are right to highlight that different providers have different systems, not just the four main ISPs. There is another system for public wi-fi; there is another system for the mobile network operators, which is the area in which we have expertise. You need to look at filters generally in the context of other measures. It is a technical measure among others, such as age verification. There are other issues, such as education and building children's resilience, which all contribute to making the internet a better place.

Our experience is that they are not enough on their own. They are imperfect, but they are by and large pretty good, but our experience is limited to the mobile networks where we set the standards of filters. When you take out a mobile phone contract, the filters are turned on and the standards that they apply are determined by the BBFC. We derive that standard from our large-scale public consultations. Essentially, we ask the public what content should be blocked for children and what content is okay for them to see. We publish those guidelines and rely on the mobile network operators and the filtering companies that work for them to apply them. They do a pretty good job, but filters are not as good as humans in reaching nuanced decisions, so we have a backstop power to deal with difficult cases.

I will give you an example. One difficult case that we had involved the website Dignity in Dying. The filters identified this as a pro-suicide site. Dignity in Dying contacted us as the regulator and said, "Please take a look at our site. We are not a pro-suicide site", and we did. We agreed with Dignity in Dying. It is a legitimate organisation that is campaigning for a change in UK law about assisted dying. It is not a pro-suicide site. The kind of debate it is encouraging is one you would have in GCSE studies at school. It is not limited to adults. We said we would not classify this content as 18 and asked the MNOs to remove the adult filter, and they did. That is a kind of hard case where we get involved.

We think the MNO system works well; it is a default on. When, as a parent, you are taking out a contract for your child, you do not need to think about whether the filters are turned on, or what security safety measures you need to think about, because it is already taken care of. For an adult, it is easy to remove the filters; if you want to you can do so. At the moment you take out the contract you can say, "Can I tick the box to turn off the filters?" or at a later date you can contact them, give your credit card details and get the filter removed. Therefore, it is easy to get it removed. The MNOs find that that system works very well. We think it works well, and we are very happy to continue to work with the MNOs on the basis that we set the standards, deal with hard cases and the default is on.

Earl of Caithness: What do other countries do? What does America do for parental filters?

David Austin: I am not sure. I can check for you. The UK leads the world in filters. The ISPs have done a very good job. They all have slightly different filters. The MNOs have done a very good job, so we do lead the world. One area where I think we could improve the effectiveness of filters is public wi-fi in a café, restaurant, shop, or outlet where children can be present. There is an organisation called the Registered Digital Institute, which is essentially the regulator of wi-fi in these places. They will give a tick to anyone who has a friendly filter. The minimum standard an operator needs to have for a friendly filter is that it does not allow pornography—the RDI, with whom we work closely, takes our definition of pornography—and it will not carry images of child sex abuse; and on that it is advised by the IWF. Anything else is fair game for the minimum standard.

Many public wi-fi providers operate a higher standard that is much closer to our published guidelines for mobile network operators, but some do not. Therefore, the risk is that if you are a child out in the street and you are on your mobile network—02, 3EE, Vodafone—and go into a café and switch to the wi-fi, the level of protection will be different and often lower, never higher. We think there is a case for standard public wi-fi, in order to get the tick, to align much more closely with our standard for mobile operators.

Earl of Caithness: Would that be easy to introduce?

David Austin: It could be done. A dialogue would be needed with public wi-fi providers, but many of them already operate to a much higher standard than the minimum standard.

Earl of Caithness: What happens to your mobile network providers if they do not comply, even with your little rap over the knuckles? What is your ultimate sanction?

David Austin: I would not say it is a rap over the knuckles. We work very closely and co-operatively with them. They want us to regulate them. They have said, "We have a headache. We are applying different standards. You are the experts. Take away the headache". We have a contract with all of them. The contract says that if we say that content would be rated 18 or higher, they are contractually obliged to put it behind adult filters. They always have. If we say that it does not need to go behind filters, such as Dignity in Dying, they have the option to keep it behind filters because they might want to operate an even higher standard of protection, but they never have. In every single case, they have followed what we have asked them to do.

Q95 **Baroness McIntosh of Hudnall:** Can I ask about public wi-fi providers? What you say is really interesting, because it is a very wide-ranging opportunity for lower standards to be applied. What would be the downside for those providers in introducing, as a matter of standard practice, a higher level of filtering? You said you thought they would have to be persuaded, and I am struggling to understand what they would be losing.

David Austin: Personally, I do not think they would be losing anything. I would need to have the conversation with the RDI who would be able to advise me better because they work more closely with these providers. We do not work with them; we work just with the mobile network operators, but technically it is definitely doable. All the mobile networks do it, and there is no technical reason why public wi-fi providers cannot do it.

Baroness McIntosh of Hudnall: Is there an economic downside to them?

David Austin: I cannot immediately think what it would be.

Baroness McIntosh of Hudnall: Good; thank you. I thought you might say that.

Q96 **Lord Sheikh:** We are discussing an international issue, because obviously other countries have similar problems. Are you liaising on what you and our European counterparts are doing to see if you can achieve some conformity? The problem applies to all countries.

David Austin: We work quite closely with a number of regulators around the world, many in Europe, the United States, Australia, New Zealand, Singapore and Korea.

Lord Sheikh: Are the standards different from ours?

David Austin: The standards are different. Each country has its own. There is the famous play "No Sex Please, We're British". We tend to be stricter in the depiction of sex than, say, the Scandinavians. The Germans tend to be stricter than anyone else in relation to depictions of discrimination and violence, given their 20th-century history. Everyone has different standards. As part of our written evidence, we have provided examples of how those standards can be different, but we can all learn from one another. Many of the methodologies and systems we use are very similar. We get together at least once a year with regulators from around the world and share best practice. Some of the innovations that we have adopted in the UK we have copied from other countries. I am going to South Korea next week to talk to the Koreans, Australians and representatives of a number of other countries in Asia about how they deal with online content and help to protect children online, so we are learning from one another all the time. Across the board, the UK probably has better and more comprehensive child protection than most other countries.

The Chairman: There may be an EU dimension to this.

Q97 **Baroness Benjamin:** Thank you for all the work you have done so far. With regard to our link with Europe, what are the BBFC's concern regarding the audiovisual media services directive? Are there some changes you would recommend the directive do to ensure that it does not lower protection standards for children in the UK, because it seems to look at things quite differently from the way we want to look at them? What is your view?

David Austin: The European Commission has brought forward proposals for a new audiovisual media services directive. One of the key goals behind the new proposals is to increase child protection online, and we very much support that. One of the things we argued for in our evidence to the Commission was a "seriously impair" test. Any content that would seriously impair the development of minors should be put behind access controls. That test has been reduced to "impair", so there is a clear desire to improve child protection. We think the methodology they are proposing, in which one member state would regulate for all the other 27, is not the right way forward in terms of child protection. We think there could be a risk of a rush to the bottom and VOD services moving to an EU member state where the protections are less stringent than elsewhere.

Baroness Benjamin: Who will decide which state will regulate?

David Austin: It will depend on where the VOD service is based. For example, we have seen that to an extent in relation to the adult industry. The Government have introduced legislation that requires Ofcom to regulate pornographic VOD in the UK. It does a very effective job. The result has been that many UK publishers of pornography have moved to the Netherlands where the rules are less stringent. We think there is a risk of a rush to the bottom and that British children are not best served

by it. We think there is a risk that the protections we have designed, in partnership with industry, which have been developed painstakingly over many years to achieve good online protection, will be disrupted and destroyed by a well-meaning desire to improve child protection.

Probably the best way of explaining it is that, if you look at a graph of where different EU member states are, we are near the top and there are some near the bottom. The Commission is bringing up the bottom and in doing that the risk is that they bring down our levels of protection. We think the Government should look at a derogation from the country of origin principle in relation to child protection only. We are not suggesting there should be a blanket derogation, because the country of origin principle is very important for the EU and for UK broadcasters, for example, who want to be able to provide their content all around the EU but, in terms of child protection, we would like to see a derogation to enable the British public to benefit from the existing protections they enjoy rather than see those protections diminished.

Baroness Benjamin: If we are not part of Europe, would that make it more difficult for us?

David Austin: When we are not part of Europe, presumably we would have the option of signing up to the AVMSD, in which case we would still need that derogation, or we would not sign up to it, in which case we would not need it because our standards would continue to apply.

Baroness Benjamin: But the material will still be able to come into this country.

David Austin: Yes, but if it was regulated by Ofcom according to UK standards that is better than not.

Baroness Benjamin: How could the BBFC or others work to prevent unsuitable user-generated content coming here?

David Austin: As to user-generated content, I talked about the tool we have developed with our partners in the Netherlands that we have been trialling in Italy. We think this is a very inexpensive and easy way of enabling platforms operating in many countries to have a robust system for age rating user-generated content. When we designed this tool, one thing we considered really important—the Commission said it had to be in there—was a report abuse button. If you see content on a video-sharing platform that you think is beyond the pale, you can press that button. In the Italian experiment we did—we would see it working on other platforms—that would send a message straight to the compliance team of that platform. They can take a look at the video and see whether they think it is beyond the pale, or not. We think it is a really good system. We have developed it over a couple of years and it has now been trialled. We would like to recoup some of our costs. We are a not-for-profit organisation, but, frankly, we would give it away. If people want to use it, we would give it away.

The Chairman: I am afraid we are out of time. Can I ask Malcolm Phillips whether he has any final thoughts he wants to share with us? Are there areas of greater collaboration and centralisation of resources from the perspective of advertising that might better protect children?

Malcolm Phillips: We welcome the opportunity to be here today, and what we look forward to most is a continued dialogue on regulatory matters connected with advertising and the protection of children, which is at the heart of what we try to do with the ASA and CAP system.

As to collaboration and centralisation of resources, David has probably pointed the way, in the sense that our experience, in common with the BBFC, is that people know where to come. We feel reassured that people know where to come to complain about advertising in the UK. We operate a one-stop shop for advertising complaints. While we are keen to continue to explore the possibilities that things like ParentPort might present, we feel that people know where to come to express their concerns about what their children might be seeing online.

The Chairman: Thank you both very much for a really helpful session. We have covered a lot of ground.

Examination of witnesses

Dr Nihara Krause, Consultant Clinical Psychologist, Founder and CEO, stem4; Dr Marc Bush, Chief Policy Adviser, Young Minds.

Q98 **The Chairman:** We are sorry we kept you waiting for a bit. We were having a very good session before, and we know we will have a very good one now. Dr Nihara Krause and Dr Marc Bush, you are both very welcome. Thank you for joining us. Can I ask both of you to introduce yourselves briefly and explain where you are coming from in relation to our inquiry?

Dr Nihara Krause: I am Nihara Krause. I am a consultant clinical psychologist and the founder and CEO of stem4, a charity that offers workshops in secondary schools in four areas of mental health and resilience. We also educate school nurses and GPs.

Dr Marc Bush: I am Marc Bush. I am the chief policy adviser at YoungMinds. We focus on mental health from nought to 25. Last year, we did a lot of work on digital resilience, which covers the online world.

The Chairman: I am going to ask a very big question, so perhaps you could get the answer into three or four sentences. How would you assess briefly the current state of children's and young people's mental health and well-being in the UK? Where are we now?

Dr Nihara Krause: Our data are still a little old, but one in 10 five to 16 year-olds present with some form of diagnosable mental ill-health condition. That statistic increases to one in four in young adults. About half of the children with mental ill-health conditions present with conduct disorder, and just under a quarter with anxiety or depression. It is probably true that the rates of disorder rise steeply in middle adolescence and again between the ages of 18 and 20.

The Chairman: Not good.

Dr Marc Bush: Child and adolescent mental health is in a period of big change at the moment. The Government have invested £1.4 billion in a transformation programme, but we are not at the end of that journey. We know that a quarter of all young people who are referred by GPs or teachers are turned away from CAMH services because the services are just not there, or the young people do not meet the thresholds of eligibility for those services. Double the number of children and young people turn up at A&E as a result of not having their needs met elsewhere. While there are some wonderful services and professionals within the NHS and schools, we know that people are waiting too long to access services, and in the period before accessing a service their needs escalate and they end up in crisis.

The Chairman: Would you say a brief word about child development stages? How do the emotional, cognitive and social needs of children change as they grow older?

Dr Nihara Krause: There are a number of different ideas, but briefly there are expected developmental stages. When children are very little, you would be working on issues around attachment and trust. As they get a little older, you would expect issues around emotional regulation, learning about give and take in relationships, learning about boundaries and, through that, how they might place boundaries on their own behaviour. That is up to about the age of five.

From the age of six until about 12, there is a very rapid change in children's understanding of themselves and the world. They start to think more about morals: for example, what is good and bad; they start to separate what is real and unreal; and they start to think more about cause and effect, so the consequences of their behaviour start to become more apparent to them. Of course, there will be the beginnings of very strong identity formation, and that will happen through testing out a variety of different types of identity.

That continues into adolescence when there is the most rapid growth in becoming independent, autonomous, starting to think very clearly about what roles they might like to take, what sort of person they might be and how they connect socially, and their responses to other people and how other people in turn affect them. That enables them to think clearly about how they relate to peers and adults. As they get older, there is the formation of intimate relationships.

The Chairman: Dr Bush, do you have anything to add to that very comprehensive answer?

Dr Marc Bush: Not much. I would pick out a couple of key words. The first is about children and young people being active in all the things that were mentioned. When we talk about the internet, sometimes we assume that children and young people can be protected from everything, yet frequently they are the people creating as well as using that content. That is a really important thing in those developmental stages. The second point is the recognition, which has already been mentioned, of the impulsive nature of later childhood and early adulthood. The final point to flag is that identity and relationship formation is happening, and that is a really important part of where we start to see the well-being impact of their online world.

Q99 **Bishop of Chelmsford:** This question gets to the nub of many of the things we are trying to explore in this piece of work. The House of Commons Committee on Health reported that the sharing of indecent images on mobile phones and other types of communication was harming young people's mental health and led to big increases in self-harm, et cetera. The Committee concluded that "in our view sufficient concern has been raised to warrant a more detailed consideration of the impact of the internet on children's and young people's mental health, and in particular the use of social media and the impact of pro-anorexia, self-harm and other inappropriate websites".

I have two questions. First, to what extent are the cognitive, social and developmental needs of children catered for or undermined by internet use? In your experience, which particular elements of children's internet use have an impact on children's mental health and well-being? Perhaps you could deal with that one; there is another question to follow.

Dr Nihara Krause: Thinking about children's developmental stages, on the positive side the internet provides an arena. It is almost an anonymous identity playground for children to play out the different roles they might feel they want to undertake. In a way, it helps them with creativity and helps them to direct where they want to be. As mentioned, they are active users of what is there outside them. The negatives are that, in a way, there is pressure to put forward your best self, and that is very difficult for children, particularly developmentally, as they are thinking about themselves. If they put forward their best self and that is criticised, or not liked, it leaves children very vulnerable and susceptible to how they might deal with things. The internet has also at some level become an escape to avoid the pressures children feel in their daily life, so it is thinking about how they might use that escape, and whether they use it positively or negatively, based on what they interact with.

Bishop of Chelmsford: Before Marc comes in, perhaps I could add my second question, which is something we have touched on at various points. Thinking probably of very young children, Public Health England's report, *How Healthy Behaviour Supports Children's Wellbeing*, identified a large body of research that showed a negative association between

screen time and mental well-being. Is there clear evidence for linking internet use? I am thinking particularly of excessive screen time and the detrimental impact on development, mental health and well-being. What further research, in your view, is needed?

Dr Nihara Krause: From what I have read, it would seem that three-and-a-half hours per day of screen time had a negative effect on children's self-esteem and body image. That is what the report mentioned. In this type of research, it is very difficult to look at the individual factors for the children who use the internet for three and a half hours. Are they the one in 10 children who might drift into using it, or might it be any child who uses it? We need to know a little more about the groups of children who might use the internet in that particular way.

Bishop of Chelmsford: What research should be done in your view?

Dr Nihara Krause: The research should be more comprehensive and use better definition of subject groups and how things are evaluated. It should use more robust methodologies, and should compare potentially vulnerable children and those who might be more susceptible to misuse of the internet with children who are not.

Bishop of Chelmsford: Although I do not have it in front of me—I should have brought it with me; I apologise—I seem to remember reading at the beginning of this inquiry some evidence related to very young children, perhaps as young as 18 months, where excessive use of, say, a tablet affected the way the brain was wiring itself. I do not know whether you want to make any comment on that. I am sorry for explaining it in such lay man's terms.

Dr Nihara Krause: Not at all. There is some research to indicate that there is neural activity, particularly if you use a tablet before you go to sleep, for example; the amount of blue light can affect sleep cycles and can aggravate overactivity in some children.

Dr Marc Bush: About a third of internet users in the world are below the age of 18. That gives us a sense of the growing population of young people who will always have been web-enabled. Two in three nine to 16 year-olds have at least one social media or networking account, and for 15 to 16-year-olds it rises to nine in 10. By their early to mid-teens, the majority of people are already frequently using online or social media accounts.

I shall skip over the impacts on behaviour, well-being and mental health because I know that is coming up later. I want to talk about some of the features that might aggravate people's mental health. The first is that the online world creates an environment where people can be cyberbullied and where offline bullying can follow people to their online activity. We have talked to young people who describe the distress they face in the playground because people are calling them names. That distress follows them on to their Facebook page, and it follows them on to their WhatsApp group among all their friends. Suddenly, it is as if they are

always being seen; they cannot hide from that abuse. It is important to recognise that, because the constant surveillance means they feel that they are constantly under threat.

In your question, you mentioned self-harm. We are worried about self-harming websites on the dark web, be that pro-ana or pro-cutting websites, which effectively promote and encourage people to self-harm. Somewhat paradoxically, some of the information on them is important for children who self-harm, because it tells them how to do so safely, but overall they promote self-harming and in some situations encourage suicidal behaviour. That is the deep web.

If we go to the light dark web, as it were, I could get my phone out right now, go to Instagram, for instance, put in a hashtag which does not include the words "suicide", "self-harm", "cutting" or "anorexia", and find a whole range of pictures and instructions about how to cut, how to ingest dangerous materials or how to restrict my diet. We feel that this is all happening in very deep spaces on the web, but I and all our children are only one hashtag away from accessing that information. Then there are the closed groups, where we will probably never be able to intervene. If I am an eight or nine year-old and I have a smartphone and my friends have a smartphone and we go off to school, we might all be in a WhatsApp group. There is no way of looking at that encrypted messaging. Therefore, promotion of those behaviours, or bullying or intimidation, can happen within that closed network. There is no way of penetrating it.

Finally on the negative side, before a couple of positives, it is important to remember that every single day on social media screens children and young people are encountering normative and unrealistic representations of their bodies, of identities and of what it means to be a particular gender. We know this is having a disproportionate impact particularly on girls but also on young men's mental health and well-being.

On the positives, when you ask young people about the risks of the online world, they rank them extremely low. That is because they are active contributors; it is where they go to get information and advice, for example from our HeadMeds site, which gives them advice on psychiatric medicines. It is also where they reach out online either to offline friends or to people they will never meet on the other side of the world to try to ask their advice. There have been recent studies that suggest there are positive benefits from going online. To give a very contemporary example, a Positive Outcomes study suggested that using Pokémon Go not only got children and young people out and about searching for Pikachu and Pokémon but engaging with their offline environment as well as their online one.

Q100 Baroness Bonham-Carter of Yarnbury: I am so glad you ended with that. We are looking at the influence of the internet on the mental health of children and young people, and of course it is important to concentrate on the bad, but I worry that that is all we are doing. I am pleased you said what you said, because there are isolated young people who can find

that information. I should be asking you a question rather than making a statement. Your description of the internet sounds a little like what we read about boarding schools of the 19th and 20th centuries—you could not get away from bullying and so on. I think you have answered the point, but I would like to press you a little more on the positives, because I do not think we should be concentrating on just the negatives of the internet for the mental health of young people.

The Chairman: Are there any more positive thoughts?

Dr Nihara Krause: It encourages children to be creative and to be innovators. It offers huge scope from that angle. From an academic and learning perspective, it is an immense source of information, if it is used positively. For children who lack social skills or who are very shy, it is a very important place to meet, connect and learn how to be part of a peer group. Certainly, a lot of young people feel that the emotional benefits that online offers are very big. They like the group support they can get from their peers.

Baroness Bonham-Carter of Yarnbury: It is a positive thing, but we have to find a way of navigating away from the potential harm.

Dr Nihara Krause: Yes. It is about enabling children and young people to know how to navigate it and be able to use it.

Q101 **Lord Sheikh:** I want to ask about emotional and behavioural problems relating to boys and girls, and how different they are. Do you find that the mental health and well-being of girls and boys is affected in the same way and to the same extent? How are they affected? Is it possible to measure and assess the effects? What remedial action can we take to deal with the different effects on boys and girls?

Dr Nihara Krause: In a general context, at a younger age there are not many differences between girls and boys. As they get older, there are more gender differences, but in general more boys than girls present with conduct disorders and behavioural problems. At a younger age, more girls—but only slightly more—present with anxiety and mood disorders. There is a lot more reporting of girls presenting with self-harm, but I think that is based on the definition of self-harm, and even with anxiety and depression it is about how boys present their anxiety and self-harm. A lot of boys who present with conduct disorders or behavioural conditions are anxious; they just show it in a different way.

Lord Sheikh: It is not easily manifested when it comes to boys. They do not tell us what they feel, although they may be feeling it inside.

Dr Nihara Krause: Yes. They might be more likely to show it through their behaviour than verbally. More boys are reported to present with addiction-based issues than girls, but again it depends on the type of addiction. If it is a shopping addiction, it may be biased more towards girls than boys. Definitely more girls than boys have eating disorders, but if you look at body image issues, a lot more boys present with concerns about their bodies.

Lord Sheikh: Do eating disorders such as anorexia apply to boys as well? Do boys have the same problems?

Dr Nihara Krause: Yes.

Lord Sheikh: I thought there would be more girls than boys.

Dr Nihara Krause: Boys present with the same types of eating disorders as girls: anorexia nervosa, bulimia nervosa and binge-eating. Boys also sometimes present with body dysmorphic disorder, which might lead them to talk about bodybuilding. They might have a slightly different concept, but the issues are the same: control, dissatisfaction with themselves and their bodies and low self-esteem.

Dr Marc Bush: As to how those behaviours manifest themselves, self-harm is more commonly reported or identified among girls, less so in boys, but in recent years the number of girls, although it is much higher, has been declining and the number of boys has been increasing. The reverse is true for suicide and suicidal behaviour. It is much higher in boys but declining; in girls, it is much lower but increasing.

It is important to mention, given the nature of the inquiry, that most gaming at the moment is web-enabled, and there is a significant difference in the gender consumption of gaming. Most of the gaming world is female: 52%. Boys tend to use massively multiplayer online games—MMOs—or first-person shooter games, which are very much about participating in questing, adventures or military operations. Girls tend to be involved in role-playing games, which are more about fantasy and sci-fi, and are more likely to use games on their mobile phones. The reason I mention that is that all those routes have the possibility of dialogue with whoever you are playing with, so there is a communication point, both positive and negative, for mental health.

Lord Sheikh: Do you find that sometimes it is temporary and they grow out of these phases? Is that the general position?

Dr Marc Bush: Yes, although there has been a huge increase in the number of adult women who play online games. The nature of some games is that people grow out of them, but actually we have games—

Lord Sheikh: But generally, is the problem you are referring to a temporary phase, or do you find that after a while it withers away in most cases?

Dr Marc Bush: No. The gender divide seems to be there within that different type of gaming world, and that is probably because of what we were saying about boys being encouraged to express anger and emotion through questing, military expertise or aggression, and girls through fantasy, creativity and showing emotion.

Dr Nihara Krause: On the question about whether it continues into adult life, it depends on each individual and why they use it. One of the difficulties with multiplayer online games, for example, is that there is no

ending. Your score gets higher and higher. For some children, for example if they have attention deficit disorder, boundary setting and impulse regulation is very difficult, so those children can become adults who continue to use those games in a different way. Similarly, if girls who are quite isolated use role-playing and do not have significant role models in their life, they may carry on using those sorts of games for much longer in adult life, because they might have an attachment to a character or an identity the games provide them with. It depends on individuals.

Q102 Baroness McIntosh of Hudnall: I was going to ask you about body image, but you have talked about that, so I am not sure how much more you want to add. Instead, I want to go back to something that occurred to me as a result of everything you have said up to now. How much of what you are describing is, as far as you can assess it, genuinely new behaviour, and how much of it is behaviour consistent with what we know has always been part of child development and adolescent behaviour, including things such as eating disorders, which we regard somehow as modern afflictions but are not? If you look at Victorian novels, you can find plenty of evidence; it is just not described in that way.

Picking up the point Baroness Bonham-Carter made about the highly inward-looking worlds of certain kinds of education, you see the same tropes manifesting themselves. How much of what you observe is genuinely new behaviour, and what order of problem do you believe the internet is creating through its ability to amplify what are standard behaviours that we have always known about?

Dr Marc Bush: I will comment on both. To answer your second question first, you are totally right. There are existing behaviour sets—responses to emotional distress and poor mental health—being played out in a new world either online or on social media. For me the big difference, and this is what children and young people tell us, is that they have the opportunity now to enhance or augment their bodies and worlds in a way that was not there before. The digital world allows you to do that in the most creative and beautiful ways, but also in ways that create a lot of distress. Most of the surveys, to summarise them, say that most children and young people have augmented their face or body on social media to make themselves look more like the images they see on their Facebook feed, for instance.

Baroness McIntosh of Hudnall: It is new because the tools are new.

Dr Marc Bush: Exactly. Behaviours that perhaps were there before are becoming more prominent. A lot of the work that has been done on early teenage sexuality has shown that a disproportionate number of early teenagers are shaving body parts to reflect the kind of bodies they are exposed to online. There are different forms of augmentation. Linked to your first point, we know that the promotion of different kinds of augmented and enhanced bodies online is affecting young men. Lots of men are starting to become obsessed with exercise; they are exercising on injury or to injury; they are ingesting things that damage their

physical as well as mental health. It reinforces that spiral in a way that is not recognised. For girls and young women, there is a lot more sensible conversation about what girls' bodies should look like. For boys, the majority of things they are consuming say that it is realistic to ingest all that, to go every single day to the gym and have a huge six pack and a huge body; but it is effectively a form of eating disorder—self-harm through ingestion and body dysmorphia. For me, that is the stuff that children and young people are saying is different about this kind of platform.

Baroness McIntosh of Hudnall: Given that what we are trying to do is see whether anything can be done to moderate that, or in some way influence people not to be so vulnerable to such pressures, from your perspective what could be done and is not being done that we should know about?

Dr Marc Bush: There are two practical things. One is an international movement to recognise iRights—you may have seen the iRights statement—which would enable children and young people to delete their digital footprint after a period. Not only should children and young people have that right; we should all have it. Secondly, there are a lot of measures that we think are really important about prevention or protection, but not everything from government and industry. They are saying, "Let us stop people using these platforms", which obviously you cannot do, and then, "Let us wrap these platforms in cotton wool", which you cannot do either, because many young people create the content themselves. We believe that digital resilience should be embedded in all curricula, so that we teach people about the consequences of what they are doing online—what it means to form an identity and seek advice online—so they can navigate the online world for themselves. The risk is that, if we do not do it for that generation, we are allowing ourselves and other generations to define a different kind of protection that possibly does not exist for children and young people. When we ask them, "What do you want us to do about it?" they say, "We are the people creating the future of these platforms. Give us the tools to navigate them and support others, and, importantly, if things go wrong we know where to refer our peers to".

Dr Nihara Krause: To add to what Marc has very comprehensively said, you are right. A lot of what is being shown is usual growing-up behaviour. Where a lot has changed is in the expectation of immediacy. It is very difficult for children to know how to deal with that. Learning to wait is no longer a concept for a lot of young people, and that creates difficulty: how do you learn things, acquire things and have patience? We need to think about that in educating children in school and home.

Secondly, because of the public nature of what they might be expressing and finding out, children are not always aware of how to protect themselves and how to know the difference between what might be real friendships and virtual friendships. There needs to be much more cohesive input into understanding relationships. There should be some

sort of social relationship education throughout. If you know how to make friends in real life and how to protect yourself against untrue friends, it becomes easier to translate those skills into your virtual life and interaction.

The third point is about more choices. Two generations ago, if you admired a pop star, you might have stuck posters on the wall and joined a fan club. Now you can follow them. You can post something benign about them. It makes children and young people feel there is a huge number of choices. How do you limit choice? How do you curb temptation, in a sense? Those are all fundamental lessons that can be brought into schools and homes. Greater education of parents needs to be encouraged. Parents are becoming a lot more digitally aware. There are courses and training, but the scene is always changing, so there needs to be some input. Adults or parents who have mental health issues themselves find it incredibly difficult to set boundaries and manage children, and those children are potentially the ones who will present with more mental health issues, so we also need to think about supporting parents.

Q103 Lord Gilbert of Panteg: We are very conscious of the danger of just listening to a whole range of problems and negatives about the internet. In the vein of Baroness McIntosh's question, can we have a look at addiction and habit-forming behaviour? Children use the internet and internet-connected devices in every aspect of their life, so it is not surprising that they use them a lot; yet children say that they feel concerned that they may be addicted, or that they are displaying some sort of habit-forming behaviour. I think you said, Dr Bush, it was more prevalent among boys than girls. Is it really habit-forming behaviour, or is it just overuse of the internet, which could be addressed through education?

Dr Nihara Krause: Research is a little divided at the moment and is developing. If you look at the traditional ways of diagnosing an addiction, both DSM-5 and ICD-10, which are the diagnostic manuals to classify internet gaming disorder, are still unclear. They are waiting, pending further research, to see whether this is primarily a disorder. However, a number of young people present with a range of symptoms that are very typical of something that is more than overuse and is more similar to addiction or misuse. They include increased tolerance, so people need to play for longer and longer to get the same hit; they show withdrawal, in the same way as you might if you were decreasing some sort of compulsive behaviour; and a few brain studies show increases in dopamine in the brain, which is our pleasure-seeking neurotransmitter. That might indicate higher levels, but the research is at its beginnings.

Lord Gilbert of Panteg: Is it possible to identify whether the children who are beginning to have those issues would otherwise have had an inclination to such behaviour in any event and this is just the way it is displayed to you, or whether it is brought about by those devices and the internet?

Dr Nihara Krause: With any condition, there is an interaction between the person and their vulnerabilities and issues, together with what is outside. That is true of anything. We are all subjected to, say, social media or body images, but not all of us will go on to develop an eating disorder. You need a combination. In that sense, a lot of young people who are vulnerable to compulsive misuse will use whatever the substance might be. In this case, it might be the internet or gaming.

Dr Marc Bush: It is important not to pathologise that use. It is just a normal response to things that children and young people are experiencing. Children and young people tell us they are using the online world both to mitigate and enhance anxiety, in effect. It is predominantly anxiety. There is a range of other things, such as looking for information or seeking help. A lot of it is about anxiety mitigation. People might go back on the same kind of apps to self-soothe. It does not matter what the content is; it is about having something they can pull out of their pocket and look at in a situation that they find triggering or anxiety-ridden.

Some positive practical solutions could be built into all those platforms. Building on a positive one that has already been done, the majority of social media platforms now have some form of message that comes up if you search for a difficult term like “suicide” or “self-harm”. You could get them to prompt other things. For instance, other areas of the world are playing with this idea: what if someone who is registered in a domain is searching at three in the morning and they are known to be under 16? Could you get a message that flashes up that says, “Is everything okay? If not, this is who to ring”? A US and Australian-based company is looking at peer-based support mechanisms to enable young people to talk to other young people on the other side of the globe. If you need to talk about your anxiety, depression or social phobia, you can discuss it with people who are experiencing exactly the same thing; they are just in a different time zone. The moderation issues are quite difficult, but it is a really good idea.

Building on that, a lot of people use gaming platforms. They are designed to be addictive because they create a virtual reward. It would not be a big step to create your own rewards, or to have your own time limit built into a game. Could an app go on top of gaming apps that said, “The half-hour is up. Why not reward yourself by walking round the garden or ringing a friend you have been putting off?” Young people could put their own rewards into those things. Young people have told us that they would really welcome that.

Finally, we know that loads of behavioural prompts ping out of everywhere—they literally ping. The first thing we hear in the morning is the alarm; the second thing we hear is a ping from our email, Facebook or Twitter. A couple of people in the tech world are thinking about whether there could be user-generated behavioural prompts. Could the first ping be, “Why not do a wake-up meditation?” or, “This is the time of day when you usually feel most stressed at school. Why not spend five

minutes in the toilets cooling down?" Is there a different way to use health-based informatics to prompt positive things, as opposed to, "Keep engaging, keep engaging"?

One in three adults have enduring mental health conditions because of childhood adversity or trauma. A great way to deal with the effects of childhood trauma or adversity is to use a fantasy—an online or different kind of world—so there are positive effects for many children and young people. However, they are also the group at great risk of becoming addicted. It starts off being really positive and then it might become an addiction, so intervening in childhood adversity and trauma more broadly through social interventions would help reduce addiction.

Lord Gilbert of Panteg: Thank you very much for highlighting those positive aspects. It is clearly an area you are both working on currently. The Committee would be interested to hear from you as your thinking develops as you conduct your research.

Q104 **Lord Sherbourne of Didsbury:** Can I follow up on compulsive and addictive behaviour that might be partly a result of the features of the app or website, or simply the response to it? Let me give you a precise analogy in the form of motor cars. Of course, we can always encourage everybody to drive safely, but what the motor manufacturers have done is build into their cars, year after year, safety mechanisms to make them easier and safer to drive. Do you have a view about whether the people who develop and create websites and apps should take a leaf out of the motor manufacturers' book?

Dr Nihara Krause: Absolutely. A number of the suggestions Marc made are part of those safety features. In addition, a lot of apps and websites have embedded marketing, for example. One of the things they could have instead are embedded safety features, such as, "Is this getting you stressed? How do you recognise whether this is working positively or negatively for you? Can you go down a gear or two?" Things like that will enable people, in a similar way, to reduce their stress.

Lord Sherbourne of Didsbury: Are there any examples at present where producers and designers of apps do precisely that?

Dr Nihara Krause: Marc? I am not sure about that one.

Dr Marc Bush: Are you referring particularly to health promotion?

Lord Sherbourne of Didsbury: No. Are there designers who have been sufficiently responsible to say, "We are going to build into our app or website something that prevents what we regard as detrimental, compulsive or addictive behaviour"?

Dr Marc Bush: As a group, social media providers have responded well, but they are at phase two, as it were. There are reporting, flagging or signposting features. I talked about Instagram earlier. If I search for terms like "self-harm", it will say, "Is everything okay? This is a distressing image. Do you really want to view it?" The problem is that I

can say, "Yes, thanks", push it to one side and keep going. The prevention side works only so far. We need to start thinking about what industry can do, along with government, to intervene when people choose to ignore safety or health promotion.

Lord Sherbourne of Didsbury: You are saying that there are examples of, if not best practice, at least better practice.

Dr Marc Bush: Better and getting there.

Lord Sherbourne of Didsbury: People could look at that as leaders of good behaviour.

Dr Marc Bush: Yes, definitely. There are also apps that go on top of apps, as it were, which effectively help parents to control the features, or limit the amount of time they use, or support mental health, such as peer-to-peer apps you can talk to or get advice from, or things like mindfulness apps. Lots of positive things are being built as well. You have set a very important challenge for government, the charity sector and industry: what is the next wave of interventions that are not just the first line of defence, but educate people to think about how they interact with the online world more effectively, and get the benefits from it?

Dr Nihara Krause: It is a great point that, at the moment, there are safety apps and potentially impulsive behaviour-inducing apps. The two being merged together is definitely the way forward. I cannot think of anything that does that, but that is the way app manufacturers are moving.

Q105 **Baroness Benjamin:** I visited several schools recently. When I asked how many children had phones, computers and mobile devices in their bedrooms, the majority put up their hands. A recent survey has shown that almost half of children admitted that they check their mobile devices when they go to bed. They play games, and sometimes they feel a bit anxious if they are not looking at their mobiles. Do you see any evidence that the always-on nature of some devices and platforms is having an adverse effect on children and young people's mental health and well-being?

Dr Nihara Krause: Yes, there are definitely some reports to indicate that children are finding it much harder in relation to their attention span; for example, there is greater distractibility. It is a different type of compulsive behaviour; it is almost like an obsessive behaviour, because often it is fear of being left out. If there is a social invite going on, they do not want to be the one who does not get it in time. If there is an image shown for a very short time, they want to be up to see it; otherwise, they will miss it and they will be the one person who does not see it. There are some reports that that sort of constantly switched-on nature reduces intimacy and creates an increase in anxiety and checking.

Dr Marc Bush: Research at Cardiff University found that three-quarters of children sleep with some kind of portable media or online device in their sleeping environment, so it is really immediate. If they wake up

during the night, they can grab it and look at it. Glasgow University found that children as young as 11 were on social media sites way into the early hours both as a way of keeping themselves engaged in what was happening in that world, which is insatiable, and as a way of avoiding sleep.

Rather than repeating what has just been said, perhaps I could end with where to take this. For us, the next part of education is thinking about self-care. In previous generations, we would have taught people to think about downtime. We would have thought about self-soothing, having a good meal, going to bed and getting the right amount of sleep. We just need to re-educate parents and young people to think about self-care, including the online world. Sleep is a really important part of self-care, and neglecting it through the online world is yet another addition to a whole range of ways of not caring for yourself.

Baroness Benjamin: You are right. I was chatting to a young girl who told me that she had a terrible life during the day and her only comfort was looking at television and people late at night and forming a relationship with them. That is another type of mental issue we are dealing with. When any of us plays a physical game, we get timeout; we get an interval and time to relax, breathe and stop playing the game and so on. Do you think that, if the providers could build a timeout limitation into whatever young people are watching on their devices, it would be a helpful feature to deal with some of the issues you are talking about?

Dr Nihara Krause: It would be a very helpful feature. Ultimately, we want young people to learn how to implement that control themselves and regulate their behaviour, but if there was a general rule that all that stuff went off at the same time for everyone and no one was communicating, there would not be so much anxiety about being left out.

Dr Marc Bush: My answer is yes, but probably only to the extent that all the preventive or protection measures work. Coding is in the curriculum; every young person is exposed to ways of navigating round all those safety features. That is where we need to make a big leap beyond just safety as the intervention. Young people are resourceful. If they want to be up all night because World of Warcraft is the only place where they have meaningful relationships, they will be up all night having meaningful relationships on World of Warcraft.

Baroness Benjamin: I tell them to empower themselves by making the decision. Perhaps that is something we need to look at as far as mental awareness and well-being is concerned—for them to be empowered to do it for themselves.

Dr Marc Bush: You are totally right.

Q106 **Earl of Caithness:** I want to follow up Lord Sherbourne's question in a bit more detail. Both of you have now been transposed into Secretaries of State in government. You have told us about lots of good ideas. How are you going to implement them? What is the role for government in this, if

there is one?

Dr Nihara Krause: It is to continue to keep the issue as an ongoing discussion and raise awareness in that way, and think about how and where the education of children and parents might take place. An obvious direction is for that type of education to be placed in schools, but it needs to be wider than schools. It needs to be in a number of different community and other settings; that needs to be part of the way we start to think. There needs to be some sort of regulation for the type of research that is carried out, who is involved in that research and how its results are promoted and advocated. It is exceptionally good that there has been so much prominence of the importance of looking after our mental health, for example. That has been incredibly important in a Cinderella of a Cinderella service at some level. However, a number of surveys are not necessarily carried out by researchers or by using some sort of psychological framework. They are publicised in a variety of ways, and they become the tools that inform and are carried into education.

Earl of Caithness: That is great. It is lovely, but is it a government job? Is it a directive from government to say, "This is what you have to do", or is it for the sectors doing it to work closer together?

Dr Marc Bush: It is about collaboration. The role for government is to work out the parameters and framework to make it work within what is knowable about the online world. Regulation is important, but it is a matter of them setting out the kind of prevention and promotion measures they want. If I was the Secretary of State, that is where I would be going.

There is also a very important collaborative role with industry, which creates most of the solutions, and the charity and public service sectors, both of which innovate in this space. Government can promote innovation; it can create funds. The DfE was thinking about that and the DH has huge innovation grants in the space, but if we want good practice models, we know that Australia is far ahead on this. The Australian Government spend a huge amount of money collaborating with both charities and industry to create online-based mental health provision. I can provide further detail offline. The Canadian Government also do that. There are working models from around the globe to show that government, through its vision in upholding children's rights but also in creating and market-shaping a new environment, can get other players to innovate in that space.

I said earlier that children and young people are active. The DfE was thinking about—I do not know where it has got to—whether some of the innovations needed to be done on a peer-to-peer basis. It was barking up the right tree, in that case, because young people probably know where other young people will go to get advice or navigate around those interventions.

Earl of Caithness: Do you agree with the evidence we have been given that children in the UK are as well protected on the internet as any

children in the world?

Dr Marc Bush: We are not a web-based organisation; we are about mental health. From what we understand, they are probably some of the best protected among web-enabled youth. It is just that where we have got to is slightly dated, and we need to update some of those protections and move to a promotion agenda.

Q107 **Baroness Bonham-Carter of Yarnbury:** This question is about social media platforms. A topical story at the moment is about the disappearance of a young man, Arthur Heeler-Frood. His parents are requesting that Facebook supply information. Facebook is not supplying information. What is your take on the responsibility of social media platforms? It is a big question.

Dr Marc Bush: It is a huge question. I would have to take it from a children's safeguarding perspective. For me, if it tips into a protection or child safeguarding perspective, there should be a requirement on those platforms to share necessary data, because it could lead to a child being found earlier than otherwise.

Dr Nihara Krause: I agree.

Baroness Bonham-Carter of Yarnbury: You said something interesting earlier, which I wrote down but have now lost. You said it was the responsibility of ISPs to allow people to get rid of things, if they want to do that. I think you are saying it is also up to them to give information if it is of use in situations that involve children's safety.

Dr Marc Bush: Yes, particularly because information on the internet is not accredited; it is not checked factually. There are fewer spaces such as HeadMeds, which we run, that give young people practical advice on psychiatric medication and the consequences of taking it. That is an important place to signpost, because a peer telling a peer about their experiences of a medicine can say, "I had a good experience, but here are the things that might happen", or, "I had a terrible experience, but here are the things that might be good for you". It is enabling peers to be informed. Sometimes in peer-to-peer education we forget that it should be an informed peer to an informed peer, and a confident peer to a confident peer. If you lack confidence, you should be signposting on.

Baroness Bonham-Carter of Yarnbury: What if it is misinformation?

Dr Marc Bush: A lot of it is misinformation, and that is where the Government's role comes in, because they can say, "Here are places that we trust". For instance, Facebook could say, "Here are the 10 places we trust if you are in distress and you want to know more about mental health". That is being piloted in other countries in the world; it would not be a huge thing to pilot here.

The Chairman: You mentioned informed peers. That is what you have helped all of us to be. I thank you both very much. We have got to the heart of some of the stuff the inquiry has been most concerned about. It

is incredibly helpful. Thank you both very much for joining us today.