RESEARCH & INTELLIGENCE

Engaging with children on draft codes of practice for protection of children online

February 2024

ANNEX 1 – Detailed specification

Ofcom
MAKING
COMMUNICATIONS
WORK FOR
EVERYONE

Ofcom invites…

…proposals to conduct deliberative research and engagement with children to understand their views on proposed measures (individually and as a package) to protect children from legal online content that is harmful to them.

e.g., seeking views on issues such as how effective the measures might be, how proposed measures might change children's use of the platform, how supportive children are towards the proposed measures

A note on content

A note on content: Please be aware that this ITT and the resulting project will include reference to Primary Priority Content (PPC) and Priority Content (PC) as set out in Section 61 and 62 of the Online Safety Act and Non-Designated Content (NDC) as set out in Section 60.

*We understand this topic area could be upsetting and that some children will not want to discuss measures proposed relating to these content areas . While we would love to hear from a range of agencies, we encourage you to very carefully consider safeguarding of participants, particularly as the focus for this study is **children aged 13 to 17 years old.** We also encourage you to consider the support available to your proposed team before putting in a bid for this project.*

When submitting a bid: *please think carefully about the level of detail you include to demonstrate any previous experience relating to this topic. Where possible, please do not include specific examples or images that may be upsetting or distressing to readers. Where you consider it essential content to enable Ofcom to make an evaluation, please <u>include a clear content warning</u> on the front page of your proposal.*

Ofcom duties under the Online Safety Act (OSA)

- Under the Online Safety Act, Ofcom is required to prepare a register of risk and risk profiles (see section 98) and risk assessment guidance (section 85) to help in scope services carry out a risk assessment for content that is harmful to children.

- Additionally, Ofcom is required to produce Codes of Practice (see Section 5), describing recommended measures for the purpose of compliance with the duties to protect children from content that is harmful to them. Ofcom is required to consult on its proposed codes of practice for protecting children online. This will take place in Spring 2024

- Section 61 of the Online Safety Act sets out the 'Primary priority content that is harmful to children' and Section 62 sets out the 'Priority content that is harmful to children'.

- The Codes of Practice have been informed using insights from across our wide-ranging programme of research, including that commissioned directly by Ofcom and the work of others. While consulting with children on the proposed codes of practice during the consultation period is not a legal requirement under the Online Safety Act, we consider it important that children shout have a further voice in the development of the policy that affects them and their future online. This piece of engagement is about asking children to 'check our work' in relation to the final proposals.

- For this reason, we plan to proactively engage with children during the consultation window, to gather their views on Ofcom's proposals. This will ensure the inclusion of children's voices in case few children respond via the formal consultation process.

Context and existing research

Background to this brief

- Ofcom is legally required to consult on its codes of practice relating to illegal harms, including offences that target children, in particular child sexual exploitation and abuse. A consultation on these proposals is closing in February 2024.

- In addition, Ofcom is legally required to consult on its codes of practice for the protection of children from legal but harmful content to children. This includes PPC, PC and NDC as set out in the Online Safety Act. This consultation proposes measures to protect children from content that is harmful to them. Ofcom are intending to consult on these proposals in Spring 2024.

- We expect a wide range of stakeholders to respond to the consultation, including a range of groups representing children, but we are keen to maximise opportunities for children themselves to share their views on our proposals.

- Ofcom has engaged with children through our research programme to inform our Codes of Practice, and we now want to engage with children to check our work.

- During the 10-week consultation window, we see an opportunity in which we can engage proactively in dialogue with children, to gather their views on measures that will affect them. Ofcom will be reviewing and considering responses in order to prepare a written statement setting out our decisions on the proposals we have consulted on and publishing our Codes and Guidance documents.

- We are therefore commissioning a contractor to support us by delivering a bespoke **deliberative engagement project with children,** with the activity completed in time for its results to inform our written statement.

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Existing Ofcom research

See below an overview of our broader programme of research which has sought to understand children's views and experiences and has been integral to the design of our policy proposals. We will be able to share more information with the successful bidder / as the work develops.

Ofcom's Online Experience Tracker

This study provides useful data around the prevalence of exposure to various harmful content among children aged 13-17 years old (including cyberbullying, negative body image etc.)

Understanding online communications among children (quant)

This project focussed on how children communicate and build friendship networks online.

It covered experience of inappropriate messages.

Children's online user ages

This study user a robust estimation of the minimum number of children with user ages that are older than their real age.

Experiences of children encountering online content promoting eating disorders, self-harm and suicide

This project focussed on pathway among children to encountering eating disorder, self-harm and suicide content online, it's impact and views on mitigations to prevent children from accessing the content.

This study has been commissioned with results expected in March 2024

Key attributes and experiences of cyberbullying among children

This project will focus on pathway among children to encountering cyberbullying, it's impact and views on mitigations to prevent cyberbullying.

This study has been commissioned with results expected in March 2024

Experiences of children encountering violent content

This project will focus on pathway among children to encountering violent content online, it's impact and views on mitigations to prevent children from accessing the content .

This study has been commissioned with results expected in March 2024

Children's media use and attitudes

This report looks at media use, attitudes and understanding among children and young people aged 3-17. It also includes findings on parents' views about their children's media use, and how parents of children and young people aged 3-17 monitor and manage their children's use

Children's media lives

The Children's Media Lives project follows, as far as possible, the same group of children aged 8 to 18, conducting filmed interviews each year to learn about their media habits and attitudes.

Glossary

This glossary of terms explains how we have used some key words and phrases, it is intended to assist the reader, but to the extent that it simplifies, or is otherwise inconsistent with, any of the legal definitions set out in the Online Safety Act (the "Act"), the definitions in the Act prevail.

Term	Definition
Harm	Means physical or psychological harm. References to harm presented by content, and any other reference to harm in relation to content, have the same meaning given to it by section 235 of the Act.
Illegal content	Content that amounts to a relevant offence.
Primary priority content	Content that is a priority harm to children (promoting suicide, self-harm or eating disorders and pornographic content)
Priority content	Content harmful to children (abusive, hateful or bullying content, content depicting or encouraging violence or the ingestion of harmful substances)
Non-designated content	Content that is harmful to children but is not set out as primary priority or priority content under the Act
Engagement / consultation / research	We see this project as being a hybrid of research, consulting and engagement – we have used the term engagement most often as we think it captures the aims of the project most accurately. It also distinguishes this project from other research and consultation activities taking place at Ofcom on this topic (in particular, the main consultation process taking place from May 2023 for 8 weeks). But ultimately there is cross-over between these 3 terms.

Term	Definition
Adult	Person aged 18 or over.
Child	Ofcom considers children to be people under the age of 18.
User-user services	An internet service by means of which content that is generated directly on the service by a user of the service, or uploaded to or shared on the service by a user of the service, may be encountered by another user, or other users, of the service.
Search services	An internet service that is, or includes, a search engine

Objectives and approach

Project Objectives

Core Objective

Engage with children aged 13-17 to understand their views on measures proposed in our consultation to protect children from online harms that are in scope of the OSA

Definitely want to achieve:

Educate children about the Online Safety Act and Ofcom's role in enforcing it

Understand views and attitudes of children towards relevant proposed measures as a whole package

Understand views and attitudes of children towards individual proposed measures

Understand how views differ depending on children's backgrounds and experiences, including wider views on regulation of online platforms

Detailed reporting on findings from engagement with children

Would ideally like to also achieve:

Facilitate engagement with members of our senior leadership team and children on the day (or before) we launch the consultation

Understand views and attitudes towards relevant proposed measures among younger children (aged 8-12), subject to safeguarding and feasibility.

Understand views and attitudes towards future proposed measures (see slide 12)

Gather ideas for additional measures

Record our activities in a way that we can publicly demonstrate our engagement (e.g. Ofcom films parts of workshops that can be shared publicly)

The following are <u>out of scope</u>:

In depth context of experiences of relevant online platform functionalities and harmful content e.g. pathways to harm, behavioural insight

You are invited to comment on the above aspirations in terms of feasibility and approach most likely to deliver these. Please also comment on feasibility/appropriateness/approach to including children in the younger (largely primary school) age groups i.e. 8-12 year olds.

Information about measures in the draft codes of practice

- We are currently working up draft codes of practice that will be consulted upon in the spring. The codes of practice will describe proposals for measures that if implemented would require online services to take steps to mitigate against the risk of children experiencing harms on their platform. Some of the measures set out in the proposals may align with those set out in Ofcom's <u>Protecting people from illegal harms online consultation</u>.

- Codes of practice will apply to User to User platforms and/or Search services. The topic areas that these codes of practice cover may include: how children access online platforms and what opportunities there are to complain about content.

- **The main aim of this project is to understand children's views on draft measures to protect them from harm online.** However, we do not consider that all measures in the draft codes of practice will need to be discussed at an individual level with children in this project – this is because of the high volume of measures, and as some of them are less directly related to children's experiences online).

- An example of what specific measures could look like are below. **Please note this is illustrative only and will not be one of the measures used in this research.** It is drawn from a summary version of our illegal harms consultation document that has already been published <u>here</u>, and is intended to mitigate against the risk of online grooming (a harm that will not be explored as part of this engagement).

> **Default setting to protect child users:**
> Children using a service are not presented with network expansion prompts, or included in network expansion prompts presented to other users.
> Children using a service should not be visible in the connection lists of other users. The connection lists of child users should also not be visible to other users
> Non-connected accounts do not have the ability to send direct messages to children using a service.
> Services with no formal connection features should implement mechanisms to ensure children using a service do not receive unsolicited direct messages.
> By default, location information of child users' accounts should not be visible to any other users via profile or content posts. In addition, any location sharing functionality should be 'opt in'.

> **The successful bidder will be given more detailed information about the codes after commissioning and required to keep this information confidential.**

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Information to share with children taking part in the project

- **In this project we intend to explore children's views on: (a) a whole 'package' of measures, and (b) approximately 16 individual measures where we think their more in-depth views will be particularly valuable.** We therefore want the methodology in this project to include a higher-level exploration with children of the whole 'package', and a more detailed exploration of approximately 16 measures, where each measure should be explored in depth with some or all participants.

- We are not allowed to share information about the measures at this stage, but for illustrative purposes, slide 13 shows how many measures are currently being considered overall, and how we think 16 of these are suited to in-depth exploration. This slide is indicative only: the successful bidder will receive updated and more detailed information about the codes, in order to co-design the participant-facing materials with Ofcom.

- Alongside these codes of practice there will be a rationale about why Ofcom is proposing them. This will draw on evidence about what risks of harm exist that the measure seeks to address, and we expect we'll need to share some of this information with children alongside the measures themselves.

- Alongside information about the measures, in order to have fruitful conversations about these, we think it will be important to share relevant **background information.** Potential topic areas for this include:

    - What the Online Safety Act is, and what Ofcom's role is in delivering it

    - What harms the Act is supposed to protect people from, whilst also trying to make sure people are able to continue receiving the benefits of being online

    - What harms are particularly relevant to children, and Ofcom's duties

    - The nature and purpose of the consultation and this engagement with children

- **We will work with the successful bidder to develop the engagement 'toolkit' for the project, making sure all information presented to children in is balanced and accurate. We will seek the successful bidder's input in designing all participant-facing materials to be engaging, and supporting children to participate in an accessible, safe and sensitive way.** We welcome suggestions on how to test materials before engaging with children to ensure they meet these needs, and Ofcom may have opportunities to involve some of our stakeholders in review of materials for this purpose.

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Indicative illustration of the number of measures, and how many to be explored in greater depth

Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8
Measure 1	Measure 1	Measure 1	Measure 1	Measure 1	Measure 1	Measure 1	Measure 1
Measure 2	Measure 2	Measure 2	Measure 2	Measure 2	Measure 2	Measure 2	Measure 2
Measure 3		Measure 3	Measure 3	Measure 3	Measure 3	Measure 3	Measure 3
			Measure 4	Measure 4	Measure 4	Measure 4	Measure 4
			Measure 5		Measure 5	Measure 5	Measure 5
			Measure 6		Measure 6	Measure 6	Measure 6
					Measure 7	Measure 7	Measure 7
							Measure 8
							Measure 9

■ Higher level exploration with participants

■ More detailed exploration with participants

Please note that the 'Areas' above could be used as overarching themes in discussions with children, but there are other potential ways of thematically grouping measures that we will be able to share upon commissioning (e.g. if we wanted to group together measures from more than one 'area'.)

Potential questions to discuss with children

- Below we have outlined key areas for discussion we want to explore in this project. However, the means of exploring these and the exact wording will be decided between the successful bidder and Ofcom.
- In your proposal we would like you to say how you would recommend exploring these questions with children in a child friendly way.

Background views on OSA, risks of being online, key proposed changes		• How do you feel generally about stronger regulation of online platforms, to give children greater protection?
Views on Ofcom's proposed measures for protection of children	**Overall views**	• How effective do you think all the proposals together are at protecting children from harm online? • Do you expect your own use of platforms to change if these measures are introduced? (If so, how?) • How supportive do you feel towards these measures? (If not, why not, what might change this?)
	Individual measures	Discussion in depth of selected proposed measures, related to a specific topic area (see slides 13 and 15) Examples of questions to explore about individual measures • How effective do you think this would be [in the context of the risks highlighted]? What would make this more effective? • (If requires users' input, explore barriers and openness to use) How likely are you to use this measure? • Will your use of the online platform change as a result? (Why/why not. If so, how?) • How supportive do you feel toward this measure? (If not, why not?)
	Potential measures*	As above but based on these being potential future measures (will be discussed in our consultation document as measures not taken forward but with potential to consider in the future, if more evidence comes to light).
Wrap up		Discussion about whether participants' views have changed at end of exercise What else do children more generally think is needed to improve online safety

* Agency are asked to consider the feasibility of this within their proposed methodology and time spent engaging with children.

Potential 'journey' for participants

- We have thought about what the 'journey' participants experience in this project *might* look like so that they are in a position to provide more informed views on Ofcom's proposals. This 'flow' might apply in a workshop setting or for alternative methods (e.g. multiple sessions, online communities).
- We have provided some detail of this below for illustrative purposes. In your proposal, please say how your recommended methodology could complement or differ from this approach.

Participant journey

Background information	Introduction to measures proposed by Ofcom	Core discussion and deep dive	Follow up
• Participants receive information about: the OSA and relevant evidence on what harms are being addressed • Introduce Ofcom's role, responsibilities under OSA and how we interpret these for relevant areas. • Potential opportunity for participants to express some initial views, e.g. supportiveness towards regulation	Participants receive information on overarching vision for relevant measures aimed at protecting children online, consolidated into themes, to avoid overwhelm and filtering out more 'back-of-house' measures.	• Discuss views on package of measures as a whole; any individual measures they think are particularly effective/ ineffective, any they particularly like/ dislike • Each participant takes part in a deep dive discussion on a small number of related measures, brought to life with illustration of how these might work.* • If in a workshop, facilitator to prepare a summary of key points with the children during conversation, for group to agree • Wrap up discussion about children's views at end of the workshop	Presentation by Ofcom to participants on summary of findings and the outcome of this work e.g. summary of Ofcom's written response / next steps.
This could take the form of an initial introductory session or a video	These could be covered in a workshop (or if more appropriate for some children, an interview), possibly preceded by an individual activity completed in advance		This could be sent as a follow-up email, with a summary report, infographic or video

*As noted we currently expect that there are 16 measures to explore in more detail, in this project. Our expectation is that in a workshop methodology, a group of children could review 3-5 different measures in detail, and that each measure can be reviewed in detail by multiple groups – as we expect it will be too challenging for all children taking part in the project to review all measures in detail.

Methodology and approach

- In this project we would like to hear in particular from children aged 13-17. We welcome agency recommendations around ethical and safeguarding considerations for working with children aged 13-17.

- However, we are also interested in options for expanding the age group, and so welcome considerations for the potential inclusion of 8-12 year olds, where it is considered appropriate, safe and ethical to do so.

- As indicated on the previous slides, we believe that in order to discuss some aspects of Ofcom's proposals effectively and safely with children, it will be necessary to share various pieces of information from our consultation document. The volume and sensitivity of information that we'd like to share, and the need for this to be digestible enough that children can respond meaningfully to our proposals, points to **a need for this engagement to have a methodology with deliberative elements.** However, we are open to considering other approaches in addition to or alongside a deliberative approach, such as participatory, qualitative, or peer/community-led research or engagement, or an advisory board, panel or citizens' assembly of children.

- **We believe that deliberative, in-person, group workshops are likely to be an appropriate method and are therefore asking all agencies to provide an option for this in their proposal.** However, we are also aware that in person one-to-one discussions might be more appropriate for some children, and are asking for an option for this for some participants – see next slide for which audiences we think should take part in workshops or depth interviews.

  - Our preference is for participation to take place in person, in a workshop or interview setting. However, we are happy to receive recommendations for how this activity could take place online and/or involve other methods (e.g. online communities, one-to-one interviews or dialogues), provided they meet the other requirements of this brief. We are also happy to consider a 'hybrid' approach for example one that would enable participants to be engaged at multiple touchpoints, or more appropriate for particular demographics/age groups - but appreciate this may be more challenging.

  - **For the above reasons, if you recommend an alternative methodology, please do include this and associated costs in your proposal.**

  - Should we use a workshop format, we would expect this to last for a few hours in order to cover the range of topics and questions we're interested in, whilst also allowing for breaks. We will also try and involve Ofcom staff to observe and if appropriate, in the event of any questions or to talk through any relevant information about our work. Alongside this, we also see this as an opportunity to facilitate engagement with members of our senior leadership team and children on the day we launch the consultation and share this publicly (see slide 19).

  - We invite agencies to consider and make a recommendation around conducting the research within educational settings. We recognise that facilitating fieldwork with children aged 16-17 via an educational setting may be challenging within the timescale, given the exam period. Therefore, we invite agencies to provide alternative approaches for engaging with this age group.

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Audience of participants

- **We request agencies to provide costs based on a minimum sample size of 95 children, across the two audiences outlined below.** But we encourage bidders to think of creative ways to hear the views of a higher number of children. Examples of how this could potentially achieved include conducting larger workshops (for example, if these took place with an entire class or year of children in a school, with some discussions taking place in breakout groups), or by using other online qualitative methods (e.g. online communities). We also welcome proposals that include any alternative approaches to the sample that might be needed if only a smaller number of children can be spoken to in our budget.

- We would like to include a 'core' audience taking part in workshops, with the features below to ensure it is diverse and inclusive of the different backgrounds of children in the UK as a whole. We would expect two workshops to take place in England, one of which should take place in London. We would expect a minimum of one workshop to take place in Scotland, one in Northern Ireland and one in Wales. We would also be keen for participants in Wales to be able to share their views through the medium of the Welsh language.

- We also want to include other audiences of interest. This could include those who might have different experiences or needs in relation to the topics under discussion, for example because they might experience particular benefits or challenges as a result of the proposals – see details of these below. We think these groups may require a different approach to the methodology and are asking for costs for these to be conducted as one-to-one, in person depth interviews.

- For our suggested method of in-person workshops, we would like to include **75 children** in the core audience. We wish to include **20 children** in the other audiences via whatever methodology you recommend. However, you are welcome to make alternative suggestions (e.g. if there are characteristics in the 'other' audiences that can be captured within the 'core' audience and methodology) and encourage you to include a suggested sample framework in your bid.

| 'Core' audience – children aged 13-17 | Mix of locations across the England, Scotland, Northern Ireland and Wales with a mix of rural and urban locations. | Inclusive and representative in terms of gender identity and sexuality | Mix of protected characteristics (e.g. ethnicity) | Mix of socio-economic groups |

| Other audiences of interest | Children with special education needs / disabilities | Content creators with larger online networks | Children in care/looked after children | Young carers | Children with lived experience of harm related to PPC/PC – such as experience of having suicidal ideation, self-harm, or an eating disorder |

Outcome of engagement and follow up on our statement

- In our consultation stakeholders will be asked to submit responses to a series of questions.

- To the extent possible, we would like this engagement with children to mirror the questions being asked in the consultation about relevant measures, and result in a similar, tangible outcome – children's own 'response' to our consulting with them. Our key consideration is that it should be an account of children's views that if read by them can to some extent reflect what they shared during this exercise. Some examples include the following:

  - All children could individually answer one overall question (e.g. 'Do you agree with our proposal') that is used as a verbatim account of their views

  - Groups who take part in a workshop together could collectively write up a series of key points from their discussion that they want to share with Ofcom and other participants – putting forward a collective view on what they've discussed during the engagement exercise. This could be facilitated as the final activity during a workshop;

  - A descriptive report detailing what was discussed during the engagement with children, written up in a summary that is accessible to children who took part.

- In addition, we are hoping we will be able to provide children with some form of response from Ofcom to the engagement activity, to demonstrate what impact their input has had on this work. This could take written and/or video form. We would therefore like to have a means of sharing this with child participants, via the winning bidder, later in the year or early next year, after they have taken part in the project.

Formal consultation responses from children and other members of the public

- We are separately considering how children and other members of the public might respond to our separate, formal consultation questionnaire, alongside more organisational and professional respondents.

- If possible, Ofcom will provide you with ways to signpost participants from this project to the formal consultation, if they wish to respond to it separately from their participation in the workshops.

- We expect that in some cases, as we will not have as established stakeholder relationships with members of the public (including children) who respond to the formal consultation, compared to organisations/professionals, that it might be useful to have the means to follow up with them to understand their responses in greater detail, by carrying out a telephone or video based interview.

- For this reason, we would be grateful if bidders can provide an additional, optional cost, for **carrying out telephone or video call depth interviews with members of the public (adults and children) who have submitted a consultation response.**

- The objective of these interviews would be to understand their written consultation responses in greater detail. As participants will have provided contact information and expressed interest in receiving follow-up contact, in order to take part in such an interview, bidders would not have any recruitment costs, but would need to allow for:

  - Design of interview materials

  - Arranging interviews – whilst all participants will have provided contact details and opted in to receive further contact about their responses, they will still need to provide informed consent to take part in an interview (as would the parents/guardians of any children)

  - Ensuring appropriate ethical considerations and safeguarding provisions are in place for both children and adults, as some adults could include more vulnerable individuals such as bereaved parents.

  - Conducting analysis and reporting.

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Communicating our engagement publicly

As part of our work to proactively engage with children on the proposed measures, we want to publicly demonstrate our work in embedding children's voices within policy thinking. This project will serve as an initial trial to help us establish our approach in doing more proactive consultation with children.

We will collaborate on this aspect of the engagement, working closely with our internal Comms team. Our current thinking includes:

- The possibility of filming workshops and using footage as part of our external comms plan e.g. via social media channels. We would like you to be prepared for in-person fieldwork to commence in a location in London, where it will be possible for Ofcom to film some of the activities and for a senior colleague from Ofcom to be in attendance.

- The possibility of Ofcom's Senior Management Team attending workshops/engaging with children/teachers – potentially on the consultation launch day
    - This could include filming conversations to be used in our campaign

Agencies are asked to consider feasibility of ensuring that this engagement is Comms friendly including:

- Consent from children and parents for filming during the workshops;

- Ability to re-contact participants to ensure consent for using footage;

- Impact of presence of Senior Ofcom colleagues during engagement activity and how to mitigate any impact of observation/presence of Ofcom colleagues on children's responses.

Agencies' proposal and research requirements

We require the following elements to be included in agencies' proposals, with details on how these will be achieved. Note that these requirements will be included in the evaluation process.

Format and detailed requirements of proposal

- Bidders are invited to **submit a proposal** to conduct research and engagement as described on the previous pages. Bids will be evaluated based on your response to the technical envelope and pricing schedule. Please also complete the additional questions and forms included in the MS Word ITT document.

- Your response to this tender should include your understanding of our requirements and objectives; how you would meet these using Ofcom's suggested methodology and sampling approach for in-person workshops and in-depth interviews, how you would carry these out; and your understanding of the advantages/disadvantages of these approaches. In addition if you recommend alternative methodologies and/or sample frameworks, please set these out, their advantages/disadvantages, and how they would meet our objectives. Bidders should propose their recommendations based on their experience of working with these methodologies and their suitability for this project.

    - If your recommended methodology involves different costs to those in the pricing schedule, please add these to the 'additional costs' table. This will not form part of the pricing evaluation.
    - Please also submit an additional document, along with your response to the tender, outlining how you would carry out the follow-up depth interviews detailed on slide 19 of this Powerpoint. This document can also cover any other additional deliverables you are submitting costs for that you think could add value to this project, but which you have not discussed in detail in the technical response. This document will not form part of the technical evaluation.

- Your response to this tender should also include:

    - Any **challenges** that bidders identify and explain how these challenges will be met. In particular, agencies should detail their **contingency plans** – in particular, changes in personnel, methodology or fieldwork and reporting timings.

    - **Careful consideration to the legal, safeguarding and ethical issues** associated with the work and **provide detail on your approach to safeguarding and follow-up support** for your team and the participants specifically tailored to this project.

    - Full details of **achievable sample groups**, including costings for adaptations to these

    - Full details of **required deliverables**, including an agency debrief virtually or in person.

    - Details and relevant experience of the **key personnel** who will work on this project, as well as any subcontractors.

- Ofcom, on this occasion, are happy for suppliers to **partner with other specialist agencies**. However, Ofcom would like to remind you of the management of third parties as detailed within the terms and conditions Clause 3 (Assignment and Sub-Contracting), which can be located within Appendix 3 of the ITT.

Other research requirements

Agency proposals should discuss and address the following requirements, plus anticipated issues and challenges around safeguarding:

- **Ethical considerations relating to conducting research among children**

- <u>Please provide information on safeguarding policies, and state how researcher(s) will balance a duty of care with the child participant's right to anonymity</u>.

- **Full compliance with UK GDPR and the Data Protection Act 2018**
  Agency proposals should discuss how this study will ensure compliance, including:

  – Completion of a *Data Protection Impact Assessment* (DPIA). As the research involves children, Ofcom are required to complete a DPIA, with official sign-off needed ahead of commencement of research fieldwork. The commissioned agency will be required to work closely with Ofcom to develop the DPIA.

  – A description of the responsibilities of the Data Controller/s and, if applicable, Data Processor on the project.

  – Details of if and when the Data Controller's identity will be revealed to the research participant.

  – Confirmation of the proposed legal grounds for processing personal data.

- **Gaining parental and child consent, and agency adherence to guidance**
  Agencies will be required to obtain child and parental/carer consent for their child's participation, collection of personal data, potential video* and/or audio recording of the session and usage of footage, prior to fieldwork, and confirm that records are kept to comply with the *MRS Code of Conduct** and *Best Practice Guidance***. The successful agency and researchers must also be registered with the *Disclosure and Barring Service (DBS) **** or relevant bodies in the nations.
  Both parent/carer and child participants should be made aware of the purpose of the research and be free to withdraw at any point during the study.

*Note that it might be only one workshop/engagement activity requires video recording in order to meet the communications objectives described earlier in this brief.

Other research requirements (continued)

Agency proposals should discuss and address the following requirements, plus any other anticipated issues and challenges around safeguarding:

- **Appropriate supervision of the child participants to be ensured:** dependant on the age and vulnerability of the child. Agencies should discuss their safeguarding policies.

- **Consideration of discussing sensitive subjects:** In particular among younger children, agencies should discuss how these topics will be handled so to ensure children are not distressed by the research, or inhibited from speaking freely about such subjects. No participants or facilitators will be shown any harmful content

- **Handling disclosures:** Agencies will be required to discuss their protocols, including escalation processes, for responding to any information disclosed by participants during fieldwork that may pose a safeguarding risk to the child.

- **Illegal material:** We would not expect suppliers working on behalf of Ofcom to be obtaining any illegal material as part of their data collection, as this may result in the commission of offences, particularly in relation to child protection.

- **Protection of each child participant's identity:** The identity of, and data belonging to, participants will be protected by the agency throughout the research process – including participant recruitment, data collection, data storage, analysis and reporting. Agencies to discuss their processes for these.

- **Research tasks within the study to be appropriate for the age groups involved:** Any tasks included within the study may need to withhold certain details to avoid biasing the results, prompting or leading the children, however participants should not be actively deceived.

- **High quality personnel:** A team that can provide excellent data quality and accuracy, alongside flexibility and responsiveness, experience of conducting research with children, and open and transparent communication.

- **Dissemination of follow-up communications from Ofcom:** we wish for the agency delivering this work to share Ofcom's response to the results of the workshops with participants; we would therefore like the successful agency to consider whether this requires consent to re-contact children or would be facilitated by the school (where relevant).

These considerations should not be regarded as an exhaustive list and we invite agencies to identify other issues which may arise, and the proposals for addressing these.

Deliverables

The following deliverables should be provided to Ofcom as a minimum:

- **Participation management**
  Processes and strategies for gaining participant confidence and minimising drop-outs. In addition this may involve re-contacting participants to share Ofcom's summary of the impact of participation in this project.

- **Ofcom engagement**
  How to ensure Ofcom colleagues are immersed in the findings and involved in the analysis process.

- **Research materials**
  The commissioned agency will be expected to draft all research materials (including documents for participants, such as consent forms, privacy notes, etc) in collaboration with Ofcom, conduct fieldwork and report back to Ofcom.

- **Data Protection Impact Assessment (DPIA)**
  The commissioned agency will be required to work with Ofcom to complete a DPIA prior to recruitment commencing.

- **Reporting requirements**

  - Ofcom will require a **full debrief presentation** (assume up to 2 hours, in person at Ofcom's London Riverside House location or virtually, to be decided), as well as a **PPT report** (assume c. 40 slides).

  - Ofcom will also require a **written word report** which must be of publishable quality. All information which could lead to the identification of a participant must be removed. It may also be necessary to remove any information relating to specific platforms in the published report, this will be agreed prior to decisions around reporting requirements.

Timing

Milestone	Individual milestone	Timing
Tender process	Invitation To Tender (ITT) Issued	28 February 2024
	Deadline for Clarification Questions	5th March 2024 at 12:00pm
	Deadline for Tender Submissions	20th March 2024 at 12:00pm
Commissioned project	Project set up and agreement of DPIA, safeguarding and ethics	March/April 2024
	Complete design of engagement toolkit	April 2024
	Identifying participants	April – mid May 2024
	Commissioned engagement/fieldwork with children	Early May – mid July 2024*
Deliverables	Interim debrief from agency Summer – to support review of consultation response	August 2024
	Further outputs: full report, delivery of summary version for participants	October 2024

*Our consultation on the codes of practice is scheduled to take place in Spring. The contractor needs to be prepared to conduct fieldwork during the 10-week consultation window. The consultation window dates have not been confirmed, but we require the contractor to be prepared to begin fieldwork in early May.