Girlguiding's evidence submission to Ofcom for the second phase of online safety regulation: protection of children

Question 1: Please provide a description of your organisation, service or interest in protection of children online.

Girlguiding is the UK's largest youth organisation dedicated completely to girls, with around 370,000 members. Girls can do anything. We help them know that, whether they're 4 or 18 or in between. All girls have a home at Girlguiding - whoever they are, and wherever they are. We show them a world of possibilities, big and small. We help them think big and be bold in a space where they can be themselves, get creative, explore, and have fun. We're a powerful collective voice – with girls, led by girls – changing the world for the better.

Our submission focuses on the specific implications in this area for girls and young women. We are glad to see Ofcom consulting with a range of stakeholders as they prepare to take on a new role as the online safety regulator, and publish codes of practice that will ensure online platforms take the necessary steps to keep children safe online and mitigate any risks or harms.

Girlguiding believes girls and young women should be able to use the internet freely, safely and without fear. Yet we know this currently isn't the case. We believe that actions to tackle online harms should be developed involving young people. Girlguiding believes that social media platforms must take greater responsibility to protect users of their platforms. We want to see all online platforms recognise the specific ways that gender inequality affects girls and young women so their plans to increase the safety and wellbeing of users are most effective. Ways to report harms online should be easily accessible and platforms should demonstrate that they take reports seriously so that users feel confident to report abuse.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Research carried out by CHILDWISE shows how children aged 5-18 are engaging with online services[1]. The research shows the majority of children have access to online services and many of them have their own devices such as a computer

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[1] CHILDWISE (2023) The Monitor Report 2023: Children's media use, purchasing, attitudes and activities

(86%), a games console (78%), a mobile phone (70%), or a tablet (59%). And that they spend an average of 3.6 hours online a day.

The research shows the favourite websites and apps for children aged 7-18 include: YouTube (87%), Netflix (77%), TikTok (62%), WhatsApp (62%), Snapchat (59%), Instagram (47%), FaceTime (41%), YouTube Shorts (39%), Discord (27%), Facebook (25%), Pinterest (25%), Twitter (22%), Messenger (22%), BeReal (22%), Instagram Reels (22%), Twitch (20%), Zoom (14%), and Reddit (12%). For the youngest age group of 5–7-year-olds, Roblox was listed as their favourite app (35%). 51% in this age group say they use YouTube every day. And despite age restrictions, 7% aged 5-7 say they use TikTok every day.

Additionally, top activities for children aged 7-18 include: sending and receiving messages (80%), going on the internet (79%), making and receiving calls (79%), playing games (76%), taking pictures (74%) using social media (70%), taking video clips (63%), and making and receiving video calls (60%).

The top favourable services and activities include consuming and sharing videos and imagery, and services where they can exchange messages or calls, suggesting these services are likely to attract children. The research also shows children aged 7-18 spend just over three hours a day watching programmes, video and short clips (3.2 hours). One in seven watch for an hour or less (14%), one in three watch for 2-3 hours (33%), and one in five watch for 4-5 hours (22%) or 6 hours or more (19%). It should also be mentioned that slightly more girls aged 7-18 chose a video sharing site or app as their favourite (44%) compared to boys (40%).

Question 4: How can services ensure that children cannot access a service, or a part of it?

We would like to see effective age-verification controls used to ensure children aren't accessing inappropriate and harmful content online. Our 2022 Girls' Attitudes Survey[2] shows that 46% of girls aged 11-21 think there should be a way to make sure someone is old enough to use social media platforms and 54% think there should be a way to verify someone's identity online. But verification should not stop the opportunity to be anonymous. 31% say having an anonymous account on social media helps them to feel safe online. This is especially true for LGBTQ+ girls and young women with 40% saying so compared to 27% who are not LGBTQ+.

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[2] Girlguiding (2022) Girls' Attitudes Survey 2022

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Our research with girls and young women shows the types of harmful content they experience online from harassment to appearance pressures. We recommend that the harms experience by children are not divided into primary or secondary priorities, and instead would like to see online platforms focus and address all harms children face online. This includes recognising and addressing the harm caused by appearance pressures, which is currently not listed as a priority harm, but we believe could fall under harmful health content and misinformation.

In relation to appearance pressures, girls tell us they see content repeated day after day from a young age that make them feel insecure and pressures them to change their appearance. And it takes its toll. For example, 36% aged 11-21 do not like posting pictures of themselves without using filters or apps to change their appearance[3].In our 2021 Girls' Attitudes Survey[4], girls aged 11-21 told us images online make them feel insecure because:

- They don't look like the people in them (45%)
- Everyone has the same body type (52%)
- They're unrealistic (eg airbrushed, filtered, the people in them have had cosmetic procedures) (60%)
- Everyone has the same 'perfected look' (66%)

As a result, 94% aged 11-21 think more should be done to protect young people from body image harms online [5].

Our research[6] with girls aged 13-21 shows 79% have experienced online harms in the last year including sexist comments (35%), cyberflashing (22%), sexual harassment (20%), catfishing (20%), pressure to share nude pictures (16%) and cyberstalking (13%). And only 15% think social media is a safe space for them.

Additionally, 4% found that their images were made nude using editing software. The tactics online abusers use are getting more sophisticated too. The ease at which people can access artificial intelligence (AI) has meant that deepfake video and imagery has now not only affected those in the public eye but normal girls online too.
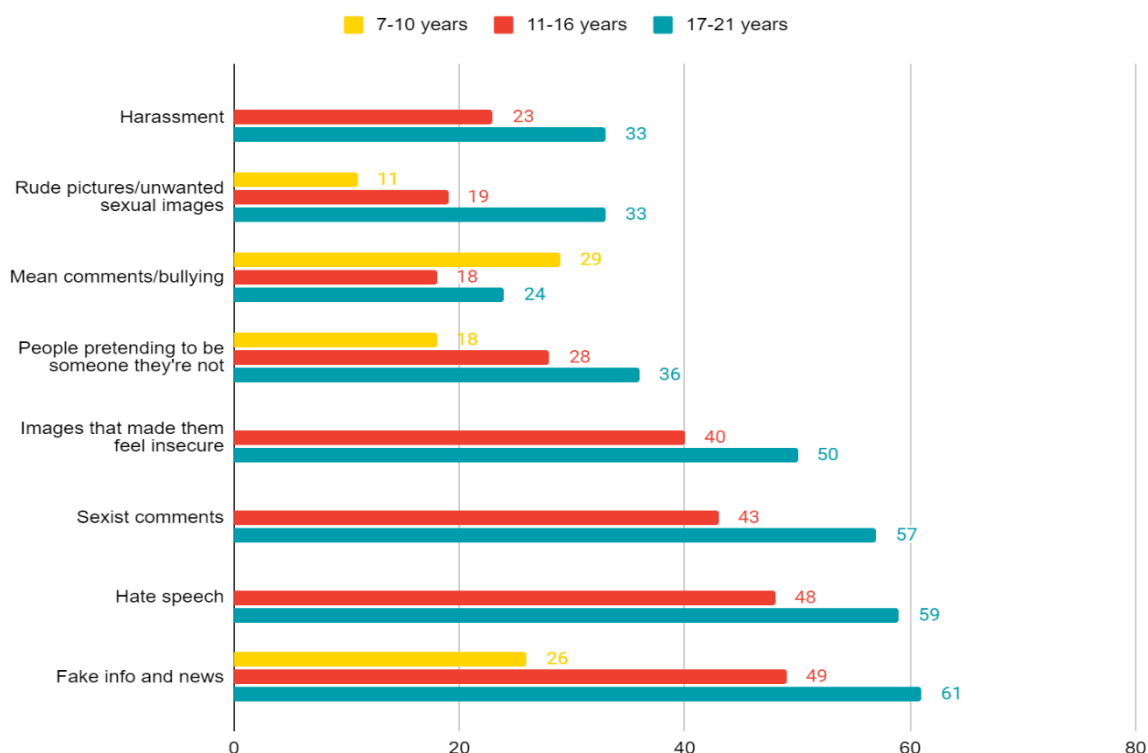
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[3] Girlguiding (2022) Girls' Attitudes Survey 2022
[4] Girlguiding (2021) Girls' Attitudes Survey 2021
[5] Girlguiding (2021) Girls' Attitudes Survey 2021
[6] Girlguiding (2022) Online harms research

Our 2021 Girls' Attitudes Survey[7] shows that 71% of girls and young women aged 7 to 21 had experience some form of harmful content online while online in the last year. This includes 49% aged 7-10, increasing to 73% aged 11-16 and 91% aged 17-21. Below is a graph that shows the types of online harms girls and young women had experienced in the last year across the different age groups[8].

Online harms girls and young women experienced in the last year

Legend: 7-10 years | 11-16 years | 17-21 years

Harm	7-10 years	11-16 years	17-21 years
Harassment		23	33
Rude pictures/unwanted sexual images	11	19	33
Mean comments/bullying	29	18	24
People pretending to be someone they're not	18	28	36
Images that made them feel insecure		40	50
Sexist comments		43	57
Hate speech		48	59
Fake info and news	26	49	61

Research by CHILDWISE also shows for children aged 9-18[9]:

- 63% feel the need to be perfect. Girls feel this way more (73%) compared to boys (54%).
- 38% compare themselves to celebs. Girls are more likely to compare themselves to celebs (49%) compared to boys (28%).
- 56% feel the way they look holds them back. Girls are more likely to feel this way (70%) compared to boys (41%).

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[7] Girlguiding (2021) Girls' Attitudes Survey 2021
[8] Girlguiding (2021) Girls' Attitudes Survey 2021
[9] CHILDWISE (2023) The Monitor Report 2023: Children's media use, purchasing, attitudes and activities

- 67% feel they don't look good enough. Girls feel this way more (79%) compared to boys (53%).

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Girls and young women in the UK report levels of wellbeing amongst the lowest in Europe and significantly lower than boys and young men in the UK, and that this has been getting worse over the past decade. We know many of the pressures girls and young women face today have a lasting negative impact on their wellbeing and mental health. These particular gendered pressures affect girls and young women online including around their appearance, sexual harassment, exposure to harmful imagery, sexism, misogyny and gender stereotyping.

Our research shows 94% of girls aged 13-21 said they experienced negative emotions as a result of online harms with 76% saying it made them feel anxious, angry, scared, depressed or less confident in themselves.

Additionally, from a young age, girls say they don't feel happy with how they look and can feel embarrassed and ashamed of their appearance. They experience intense appearance pressures and tell us that fear people will criticise their bodies and appearance holds them back from doing everyday things they'd like to do. Our research[10] shows 54% aged 11-21 have seen adverts online that have made them feel pressured to look different. And 39% aged 11-21 feel unhappy they can't look the way they do online.

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

Providers need to make sure that the services they provide have accessible terms of services and public policy statements that use clear and simple language that can be understood for all ages. Girlguiding advocate Charlotte, aged 16 says:

'The terms and conditions need to be able to be understandable for the minimum age that the platform allows. This should mean that for most platforms minimum reading level of High school should be used. At the moment the communications are written in such a way that a 13-year-old child may not understand fully what they are signing up to'.

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

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[10] Girlguiding (2020) Girls' Attitudes Survey 2020

Providers must ensure their services have reporting and complaints mechanisms that are clear to identify and not easily missed. The process must be made really clear and simple so that children and young people can report harmful content. Online providers also need to make it clear what action has been taken so that young people feel confident their concerns have been taken seriously. Girlguiding advocate Charlotte, aged 16 says:

'Often reporting a post or a user can be a very time consuming and confusing process, this is often followed by a message that no action will be taken to that user or post reported. This will lead to less people reporting posts that need to be taken down. Online services need to make their reporting services easier to use, this can be through having a customer help line that is well signposted and accessible to those wishing to access support and/or help while reporting a post they found upsetting'.

Question 16: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

We believe there should be better prevention measures by online platforms to address the harms that girls and young women experience daily when they're online from the relentless appearance pressures they face to harassment and abuse. We think online platforms should take greater responsibility for users' safety and wellbeing, by preventing these harms. Ofcom should provide guidance on these harms, and make sure there are consequences for online platforms that fail to do so.

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

Research by CHILDWISE shows 79% of children aged 7-18 don't have to think about what they watch on TikTok as the algorithm recommends it for them. 58% say the same about YouTube. And 32% of TikTok users and 28% of YouTube users say they don't like how much the service seems to know about them and what they want to watch. Additionally, 85% of YouTube users and 51% of TikTok users would prefer it if the services didn't have so many adverts[11].

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[11] CHILDWISE (2023) The Monitor Report 2023: Children's media use, purchasing, attitudes and activities

Our research in 2020 revealed that the number of online adverts described as harmful by girls had increased, with many of these focusing on body image, objectification and sexualization[12].

In this review, Girlguiding youth panel members highlighted their experiences:

'I think repeated images which demonstrate a specific body type are potentially damaging as this narrows a young person's outlook as adverts lack a diverse selection of bodies. This alarms me as the messages portrayed by adverts impact people's opinions of themselves and others. If there is a continuing lack of diversity in the media, then this can have a detrimental impact on how girls and women perceive themselves.' Kirsty, previous British Youth Council delegate, 18 at the time.

'I think online ads are more invasive due to the nature of the relationship between young women and their phones. My social media is where I go for my role models, for inspiration and for empowerment so when it's infiltrated by damaging stereotypes or products such as weight loss pills, it leads me to doubt myself and feel bad about my body. As a generation we use our phones all the time so are more likely to be exposed to these harmful ads.' Grace, previous British Youth Council delegate, 16 at the time.

Online services must implement a safety-by-design approach to their platforms, ensuring that there are mechanisms in place to reduce the harmful content girls are exposed to online. This includes ensuring there are design standards that platforms must abide by when thinking about specific functions of their algorithms. This can be done through:

- Allowing users to disable addictive product features and opting out of algorithmic recommendations, or making it automatically this was automatically disabled for under 18s.
- Ensure algorithms do not allow harmful content to be promoted towards children. For example, content relating to self-harm, suicide, eating disorders, substance abuse and sexual exploitation.

Girlguiding advocate, Charlotte, aged 16 also raises a really important point concerning algorithms and content warnings:

'Online platforms don't protect vulnerable people using their services. Algorithms need to be regulated to ensure that it's not promoting harmful content to children

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[12] Girlguiding (2020) Are gender stereotypes in advertising harming girls and young women? A review by Girlguiding youth panel members

and young people. Some online platforms have harmful content warnings but it would be helpful to know what it could trigger as just "This content may be harmful" is extremely vague and gives little to no information to the person accessing the post to aid in their decision whether to open it or not'.