

Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.

Is this a confidential response? (select as appropriate)

No

Our division within the TEO is responsible for the administration, governance, and delivery of a number of Good Relations programmes and activities. A number of these activities will include participants who are children and young adults however these are largely delivered in-person.

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

Is this a confidential response? (select as appropriate)

No

The main platforms that tend to attract children online revolve around social media. Platforms that allow children to watch videos, play games and connect with friends.

Question 3: What information do services have about the age of users on different platforms (including children)?

Is this a confidential response? (select as appropriate)

No

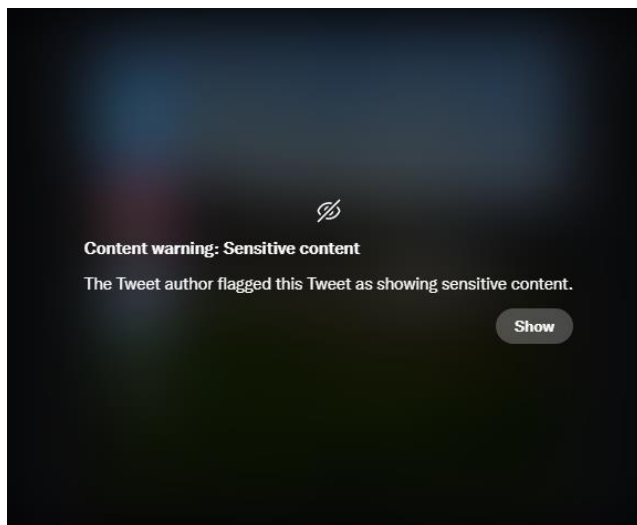
We would have data on the number of children taking part in our programme's and the age category they fall within. However, our programmes are mostly delivered in person as opposed to online. There was an exception during covid when some organisations delivered good relations programmes via tools such as Zoom and Teams.

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

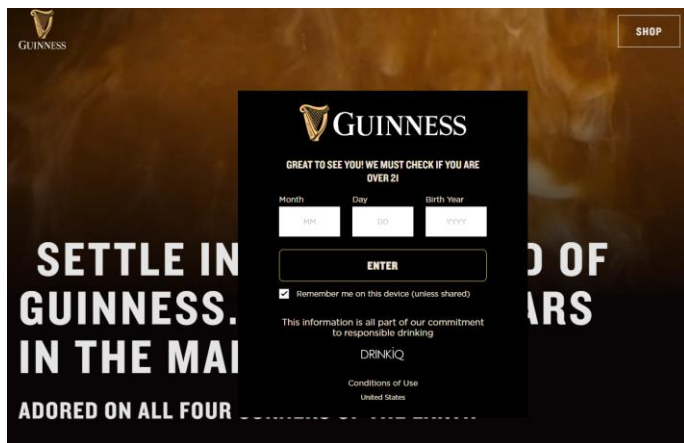
Is this a confidential response? (select as appropriate)

No

I know some services will provide warnings before inappropriate or sensitive content is displayed for example Twitter. However, this is just a warning and does not prevent a user from going ahead and viewing the content.



Alcohol websites also have an age check, however there is no verification process in place.



Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

Is this a confidential response? (select as appropriate)

No

We wouldn't have any harmful content on our website and as such to not implement any assurance or verification processes.

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?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

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

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?

Is this a confidential response? (select as appropriate)

No

In terms of anything we might do in TEO – we do where appropriate provide child-friendly privacy notices and information and consider data minimisation and the like when promoting our own materials.

For any photoshoots – we get signed declaration for image to be used by parent/guardian if under 18.

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)?

Is this a confidential response? (select as appropriate)

No

Firstly, they need to make such documents easily accessible on their site. Often such statements can be hidden away or hard to find. It could be an idea to have these displayed on the home screen or as a pop up when first entering the website or platform. Secondly, the statements can consist of a lot of legal terminology and written in a way which is hard for a child to comprehend. Surely a child friendly version could be created or even a video version which may explain concepts better.

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?¹

Is this a confidential response? (select as appropriate)

No

Our website wouldn't contain any 'primary priority' or 'priority' harmful content.

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

Is this a confidential response? (select as appropriate)

No

Similar to Q11. Such processes need to be easily accessible on websites and platforms. They also need to be acknowledged. Often a report is submitted and you don't receive any feedback on an outcome or what happened next. This reduces confidence in the process and creates an attitude of 'why bother'.

¹ See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Is this a confidential response? (select as appropriate)

No

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The most straight forward way for services to deal with content that is reported as being harmful would be to temporarily suspend or remove it from their platform. This would allow time for the content to be reviewed and/or the systems in place (such as age verification) to be reviewed if a child has managed to access harmful content.

The relevant authorities should also be informed if appropriate.

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

Is this a confidential response? (select as appropriate)

No

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

We are not aware of specific functionalities that would mitigate risk. 'Like' and 'Dislike' functions should in theory help to hide or at least push back content in the algorithms so it is less likely to be viewed. However, this shouldn't be used as a tool to monitor harmful content. It may be helpful if there was a feature allowing users to tag content as 'sensitive', this could then prevent it appearing on young peoples accounts.

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Is this a confidential response? (select as appropriate)

No

I don't believe there is a limit on what services can do. It is about forcing them to do so. They can already present extremely targeted advertising content within our social media feeds. There is no reason why the same tools and techniques could be used to hide harmful content from young users.

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

I suppose there is two ways this can be done. In the context of Social Media, where content is provided by users, more resources need to be invested into the monitoring and reviewing of content when it is being uploaded onto platforms. Organisations either manually or through AI techniques need to better identify content that is inappropriate and prevent it from being posted or classified as sensitive.

As for Adults sites, age verification processes need to be more robust. Some are non-existent.

TIKTOK – I believe there is also a feature on tiktok allowing parents to link accounts to their children. They can then verify the content that they are viewing.

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)?

Is this a confidential response? (select as appropriate)

No

Service algorithms should be able to identify the age of their users. Content hosted on their sites should also be classified in some way such as 'Child friendly' 'Safe viewing' or 'Sensitive/ 18+'. These two measurements should be considered in algorithms to block inappropriate content and push safe content.

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

Is this a confidential response? (select as appropriate)

No

User moderation – similar to a 'like' button, there could be a function to identify 'sensitive' content which would then be hidden from children.

As mentioned in Q18, platforms need to invest more in moderating content themselves before it is public on their site. They could also restrict the ability of users to upload content to only those who are verified, this may help prevent illegal content being uploaded.

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Question 22: How are human moderators used to identify and assess content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

N/A, we have no human moderators employed.

Question 23: What training and support is or should be provided to moderators?

Is this a confidential response? (select as appropriate)

No

I imagine moderators may come across harmful and upsetting content. I would suggest there should be some support in the form of counselling which is readily available to them.

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?

Is this a confidential response? (select as appropriate)

[Please select]

We wouldn't have the knowledge to answer.

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 26: What other mitigations do services currently have to protect children from harmful content?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?

Is this a confidential response? (select as appropriate)

[Please select]

N/A

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

N/A