

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?	<p><i>Is this response confidential? – N</i></p> <p><u>About the LEGO Group and Overview</u></p> <p>At the LEGO Group, children are our role models, and our mission is to “inspire and develop the builders of tomorrow”. We understand that through our play experiences – both offline and online – we have an impact on the lives of the millions of children couwe engage with around the world. As such, we</p>

have a clear responsibility to ensure that wherever we engage with them, the impact is positive, that we protect and uphold the rights of children, and that we foster their well-being.

By way of background, the LEGO Group was founded in Billund, Denmark in 1932 by Ole Kirk Kristiansen – its name derived from the two Danish words Leg GODt, which means ‘play well’. Today, the LEGO Group remains a family-owned company headquartered in Billund but with around 1,500 people employed in the UK.

Building on years of experience in creating safer digital spaces for children, we welcome the opportunity to contribute to this consultation. Our response is focused on Ofcom’s workstream headed ‘we live a safer life online’ and will also outline learnings from our work undertaken in this space, including with Ofcom directly, focusing on the topics of ‘Online Safety’ and ‘Making Sense of Media’.

Specifically, we see an opportunity for Ofcom to protect and promote children’s rights and well-being in its delivery of the new online safety regime. The new online safety regime rightly prioritises regulated services’ obligations to identify and mitigate risk of harm to children, as they require enhanced and proportionate protections to ensure that technology works in their best interests. Additionally, we would welcome the opportunity to **work with Ofcom to give due consideration to children’s rights and the benefits of technology to their well-being. This comes alongside the critical requirement of protecting children and enabling the design of positive experiences online for children.**

Online Safety – Ofcom should give due consideration to children’s rights and the positive benefits of technology to children’s well-being in the implementation of the new online safety regime

The LEGO Group’s primary focus relating to online safety is of course the Online Safety Bill. We welcome the Bill’s focus on prioritising the safety of children. We believe that the expectation on regulated services must go beyond the avoidance of risk of harm and consider the positive benefits that technology

has for children's development, their rights and overall well-being. Alongside the inclusion of this requirement in the 'safety duties protecting children' section of the legislative text, there is also the opportunity to include this principle in Ofcom's codes of practice and its implementation of the law/oversight of the new regime.

Online Safety – information about the LEGO Group

At the LEGO Group, we have always strived to be best in class when it comes to our users' online safety. We were pleased to have our safety by design approach through the launch of our LEGO® Life app referenced positively by the UK Government in the full government response to the Online Harms White Paper. Our proactive work around online safety has also been cited as best practice by the Home Office and Information Commissioner's Office and we continually strive to make sure this work is maintained and improved upon.

The LEGO Group has also had a partnership with UNICEF since 2015. We developed industry-first policies to strengthen child safeguarding and created the Child Online Safety Assessment tool (COSA) that other companies can use to improve their own online safety. Furthermore, together with UNICEF and global academic experts, we also launched a project in 2021 called the Responsible Innovation in Technology for Children (RITEC). This explores how businesses and policymakers can create a digital world that prioritises the well-being of children, including a newly developed framework to achieve this.

The framework illustrates key outcomes and indicators that children told researchers are important for digital play experiences. These outcomes and indicators are design objectives that that evidence suggests a digital play experience – if designed with the goal to promote well-being – should aspire to impact upon. This includes making sure the child feels: competent, creative, emotionally regulated, self-actualised, safe and secure, digitally included, empowered and socially connected. For more information about the project's status

and next steps, please visit:

<https://www.unicef-irc.org/ritec>

Making Sense of Media

In addition to designing safe and fun digital play products for children, we want to empower children and their families to be digitally smart and equip them with a better understanding of their digital rights, responsibilities and own well-being in a digital world. 'Digital empowerment', including media and digital literacy, is a very important part of the LEGO Group's approach to help children learn skills to stay safe, healthy and happy online. **We welcome a strengthened focus in Ofcom's plan on 'media literacy' and are proud to be a part of Ofcom's Making Sense of Media working group. We will continue to work closely with the organisation to achieve our shared ambitions.**

Making Sense of Media – information about the LEGO Group

We have a range of initiatives at the LEGO Group that seek to support this agenda as part of the free resources included in our "Digital Empowerment" program for children and families. This includes fun, interactive guides, games and play activities designed to equip digitally smart families. Resources such as Doom the Gloom, a mix of mini-games and interactive videos, provides children with the opportunity to playfully explore and learn more about safety and well-being in a digital world.

Build & Talk is a range of activities to help parents and caregivers talk with their children about digital safety and well-being supported by physical play. These activities include addressing issues such as cyberbullying, screen time, false information, online security, privacy and safe sharing and digital footprints.

To learn more about the LEGO Group's Digital Empowerment programme and our latest resources for families, please visit:

<https://www.lego.com/en-us/sustainability/children/digital-child-safety/>

Conclusion

There is global consensus around the complexity of the digital environment and the collective responsibility of all stakeholders to “ensure that children can benefit from digital opportunities and protect them from online harm” (2019 UK Government response to the drafting process of the UN General Comment 25 on Children’s rights in the digital environment¹). Risk of harm will continue to evolve and with the speed of innovation, new risks may emerge or existing ones may change in nature and scale. Therefore, we believe there is also benefit in giving due consideration to upholding children’s rights and enhancing the positive benefits that technology has for children’s well-being (such as increased competence, social connectedness, empowerment, sense of belonging).

We look forward to continuing to work with Ofcom to promote and achieve the design of a nurturing digital world that fully delivers for children, by protecting their rights and fostering their well-being on a firm foundation of safety and privacy.

¹ [General comment No. 25 \(2021\) on children’s rights in relation to the digital environment | OHCHR](#)