

**Internet Matters**  
**Online Harms White Paper**  
**Consultation Response**  
**June 2019**

## Introduction to Internet Matters

Internet Matters is a not for profit organisation dedicated to helping families keep their children safe online. We are pro-technology, as we believe children from connected homes have better outcomes, and we are focused on providing evidenced based useful and practical insights to families at their point of need. Our advice comes in many ways – by age of child, by issue, by app, device or platform. We are backed by some of the largest companies in the world and through them we are able to reach almost all UK parents. We know that nearly 9 in 10 parents will recommend us to friends and family, and as a result of seeing our content parents are significantly more likely to take some form of action to minimise the risks their children face online. We sit on the Executive Board of UKCIS and are in the process of setting up a working group on protecting vulnerable users online.

## Response to the Consultation Paper – Summary points

Internet Matters welcomes the publication of the Online Harms White Paper and is delighted to contribute our thoughts to the consultation. Whilst the consultation paper is a sizable document, we have confined our responses to the questions that concern us most directly and where we have most expertise. These are questions around the education of parents and what role the government and putative regulator should play in this area. However, before we get into the detail of those two questions we wanted to note:

- i. This paper is a welcome intervention on the subject of online safety, with its **focus on proportionality and the evident care taken to balance the prevention of harms with the protection of free speech**. This is no easy task, and the debates will continue to rage on where this balance should lie.
- ii. We were pleased to see a **focus on harms** in the White Paper, as clarity around the issues and their scale is very helpful. There is more work to do here, but this is a good start, and a step in the right direction, as it places children firmly at the centre of this debate and they must therefore be central to the policy solutions that will emerge from this consultation.
- iii. One way in which we will know we have got the balance right in this complex policy area is if children are safer online. The impact of this White Paper and whatever flows from it has to be judged on whether more children can enjoy the benefits of the internet safely and securely. Any proposals that **drive children off the internet will be a manifest failure**.
- iv. Hence the proposals around the Duty of Care and the Regulator, whilst welcome innovations, will require **considerable and detailed thought** to ensure they do not come with a drag-net of unintended consequences. Recent interventions in the online safety space by some regulators could perhaps have been executed better, so it would behove us to learn those lessons. There is much to be done, and so taking the time to learn from experience could be a good investment of time. The regulator, whether new or reimagined must have the talent, time and money to be effective.
- v. This White Paper focuses on what the tech companies can and should be doing. That's important. Companies across the internet can and should do more. Equally, recognition should be given to the companies who are leaders in this area – those that are making technical changes and investing in education. However, **recognition should also be given to the reality that with harmful but legal content, the harm is dealt from one person (or group) to another. In other words, it's a behaviour, the scope and significance of which is amplified by technology. To achieve the objective of making the UK the safest place in the world to go online, we have to tackle the behavioural issues in our society that permit keyboard warriors and online bullies to say things from behind a screen that they wouldn't own offline.** In the same way that it is now socially unacceptable to drive after drinking or to discipline a child with a cane, we need political leadership to trigger a change in online culture. We should be teaching our children to own their behaviour in every sphere and that words and behaviours have consequences. If this White Paper triggers the conversations that begins to deliver that change, it will make great progress.

## Detailed answers

### Should the government be doing more to help people manage their own and their children's online safety and, if so, what?

The Online Harms White Paper is a welcome intervention in the crowded landscape of online harms education, precisely because it identifies three welcome basic principles. These principles; **education, collaboration and evaluation** should be the foundations upon which the interventions required to make real the ambition, for the UK to be the safest place in the world to go online, should be built.

A market economy has developed in the UK around online safety education and, as with all markets there are products of variable quality. This needs to change. **The single most important thing the government could do to help people manage their own and their children's online safety is to champion one or two gold standard advice giving organisations.** Any such organisation should be required to embody those three principles – of education, collaboration and evaluation. This is important because as the internet has democratised access to so much, so online harms education should be of a consistently high quality for all who need it.

#### Education

Our research shows that whilst 96% of parents recognise it is their responsibility to keep their children safe online, 70% of them need help to do so. Providing this help must be a collective responsibility, where companies, schools, parents and the not for profit sector each play their part. We have to create a cohesive approach that cuts through the overcrowded landscape – and ensures that our messages both reach parents and inspires them to act. Parents are looking for an authoritative voice, they are not looking to wade through reams of text from multiple sources, of varying quality to get the advice they need.

If we are truly committed to making the UK the safest place in the world to go online, we **have to significantly raise the awareness of educational platforms, content and tools that interrupt and engage busy and often confused parents.** That is precisely what Internet Matters does. Internet Matters is solely focused on helping parents and carers engage with their children about their online lives. We provide expert advice, evidence-based insight and simple practical steps for parents and carers.

**Engaging parents is about changing behaviour** – and there are two ways in which we need to do that. Firstly, we need to continue with the preventative, mass market information / advice work. This has to provide families with relevant and actionable information, by age of child, to inspire them to get involved with their child's digital lives. The Change 4 Life campaign that has been successfully operating for over 10 years is a strong example of a behavioural change programme that targets physical wellbeing. We believe there is a role for a similar approach for children's digital wellbeing.

Clearly looking to industry to drive this engagement is an obvious conclusion, however as the White Paper suggests this will be most successful if this is achieved in a co-ordinated and unified way, such that parents are not bombarded with individual activities and programmes from the many companies involved in connected technology. Internet Matters has established a unique framework where industry can leverage the relationships they have with their customers to engage almost every parent in the UK. The results to date demonstrate that this is a successful model and one that could be easily expanded with government support.

The second way to change behaviour is to **go where the harms really are** and make a material difference to the children and young people who are being genuinely harmed through their internet usage. Our evidence suggests that we can predict the online risks a child or young person are likely to take if we understand the cluster of vulnerabilities they are enduring. Of course, prediction in and of itself is insufficient. But for the 2 million children the Children's Commissioner (for England) suggests are living in such troubled places the state has to intervene, we can do something. We need to equip the responsible adults that support these most vulnerable children –

teachers, SENCO's foster parents, mental health professionals, social workers etc. – with the training and resources they need to engage effectively with the digital lives of the children in their care. Internet Matters is working through the Executive Board of UKCIS to create a working group to create the resources that these professionals will need across the UK.

This dual approach of the **provision of mass market information / advice combined with a relentless focus on how to make the digital dividend available for vulnerable children** will make a material difference.

Meaningful parental engagement is the single most important factor in keeping children safe online – and **the government should use its influence to back the organisations that do that best, so that parents and carers can find the information they need faster and be confident in the quality of the information they see**. Precisely because we are backed by some of the largest brands within the internet we enjoy significant scale and reach amongst families.

Indeed, the Government response to the Science and Technology Committee's inquiry, published on 23 May 2019 suggests we are getting it right:

“It is critically important to ensure that parents and carers are media literate and have the right support in place to have a meaningful dialogue with their children on online risks. Organisations such as... **Internet Matters... already produce high-quality materials to support parents and carers**”.

## Collaboration

The second principle that the White Paper identified was collaboration. Whilst it is tempting to look towards the biggest internet companies to individually lead the way, we know that there is a vast eco-system of organisations that are involved in facilitating the digital lives of our children. It is complex to attribute responsibility amongst such a broad group that includes, sectors like social media, gaming, networks, content platforms, hardware providers, software companies and retailers. All share in the challenge of ensuring the UK is the safest place for a child to be online. We encourage government to support educational and awareness programmes that allow the broadest range of organisations to collaborate as this will ensure that together we can have the greatest impact.

Internet Matters is a **proven model of industry collaboration** where despite many commercial and competitive differences, a number of the UK's leading organisations have come together to contribute their resources to addressing this huge societal challenge. We are five years old and have in just that short time expanded our corporate supporter base from 4 ISPs to 13 blue-chip companies who between them represent a significant part of the internet eco-system. We acknowledge the on-going support from our Founding Partners BT, Sky, TalkTalk and Virgin Media who lend us their continued support over the last five years.

Critically, these companies also engage in our partnership by activating it in a way that works for their brands. Importantly, many of these organisations not only support Internet Matters campaign but they continue to develop bespoke programmes of activity that meet their own customer's needs.

Finally, the recognition by parents that a programme is supported by so many household names reassures parents they are engaging with a credible and trustworthy organisation. Our research also indicates that parents have high expectations of what companies that profit from young people being online should do to demonstrate their responsibility. Nearly three quarters (**74%**) of parents agree that **funding organisations like Internet Matters is a demonstration that the companies want to help**. There are benefits for the companies too, with **70% of parents saying they are more likely to trust a company that supports Internet Matters**.

## Collaboration confers both authority and reach – two vital ingredients.

There are several reasons collaboration is effective:

- i. For modest investment companies partnering with us receive evidenced based insights, resources and recognition. We are **efficient** and our impact data demonstrates our **effectiveness**.
- ii. It can be **complementary to the work our supporting companies want to deliver** by themselves. Whether it's Sky's work on Broadband Buddy or Talk Talk's report on Teenage Loneliness, BT's PlusNet Plays or Virgin

Media's focus on Digital Resilience, we've demonstrated that organisations can collaborate, whilst also engage in their own business priorities – in addition to creatively engaging with ours. Business led collaboration can inspire rivalry and competition with a desire to beat competitors through innovation and best practice.

- iii. The engagement of supporting companies – both financial and proactive provides **unrivalled reach into homes and around tech products**. We know that parents are looking for an authoritative voice to help them navigate online risk and harm – which is another reason why Government should use its powers of influence to back / accredit or publicly support one or two organisations. This would help parents have confidence in the advice they receive.

But it is not only with industry that we collaborate, Internet Matters has long acted as a sign-posting destination for the many organisations that provide products, service, resources and support to parents, carers, professionals and children themselves. Like Change 4 Life, an established authoritative voice can act as a successful vehicle to drive engagement with the best available resources from the sector.

We wanted to conclude our comments on collaboration with a view from **Children's Commissioner Anne Longfield, 2018**

*“By bringing together industry and providing expert advice to parents, **Internet Matters is making an important contribution** to giving children the resilience, information and power they need to make informed choices in this rapidly growing digital world.”*

## Evaluation

Anyone can have a point of view and create resources – but unless they are regularly and robustly evaluated to ensure they are inspiring parents to make a material difference in the online lives of their children it's impossible to know if they are any good. We poll 2,000 parents of children between the ages of 4-16 every quarter to ensure that our resources are genuinely useful. Those thousands of parents have told us what they are concerned about, what their experiences of parenting this digital generation are, and shared in depth their thoughts, hopes and concerns on topics such as screen time, online gaming, livestreaming and online pornography.

This consistent, frequent and independent engagement with parents and their children enables us to create a virtuous circle where we are effectively addressing known parental needs, understanding their nascent concerns and fears and feeding those insights back into our resources and campaigning. As new trends emerge or concerns in some areas diminish we can adjust our content and campaigning.

It's the continuous feedback that ensures that over time, consistently nearly 7 of out 10 parents (69%) tell us that our resources are either very good or excellent. Nearly four in five parents (79%) are inspired to talk to their children about online safety after visiting our site, and 70% are inspired to talk to other people. This, plus the inspired to act figures that we highlighted earlier explains why nearly 9 in 10 parents recommend Internet Matters resources to their friends and family. We know that what we do makes a difference, making our biggest challenge one of awareness and reach.

Online safety is too important to leave to pet projects and resources from organisations that cannot demonstrate the impact they have. The Government could and should consider backing the organisations and programmes that are making a material difference to make it easier and simpler for parents, carers and professionals to embrace the challenge of helping children stay happy and healthy online.

**Question 18: What, if any, role should the regulator have in relation to education and awareness activity?**

Whoever the regulator is, and whenever they start work, it will be important to recognise that there is an existing eco – system of education and awareness in place. They are not starting from a void. Industry has invested a significant amount of money in organisations and programmes which are making a difference. Of course, more needs to be done, and some sections of industry could and should increase their investment in this area. Equally recognition should be given to the notion that as risks and harms evolve, new and agile solutions will need to be found. However, the need for high quality, evidenced based, actionable advice to parents and professionals is here to stay for the long term.

The regulator could and perhaps should play an important role in convening the commissioning of publicly funded research / education to ensure it meets the three principles in the White Paper – that it is educational, that it is collaborative and that it will be independently evaluated, with lessons and insights freely shared. Perhaps therefore the role of the regulator is to identify and commission research into the gaps in provision – which may be geographic, thematic or identity based – and challenge / incentivise / inspire a solution to the issues raised by that research. In doing so, the regulator will be adding to the sum of knowledge, rather than replicating it. Additionally, the regulator may also want to develop a methodology to determine effectiveness for work funded by tax payers to ensure value for money is a key criteria.

The question then becomes what does the regulator do with those insights - is open-sourcing them sufficient or should they also commission awareness activity? The basis for that judgement has to be whether the regulator is optimally placed to deliver that awareness activity, or whether there are other organisations that can do that better / more impactfully / more efficiently. Given our expertise in this area, built from 5 years of experience and engagement with some of the most exciting brands in the UK, we have some learnings that would be useful to the regulator. We would be happy to share our insights at the appropriate time.

Of course, the having the regulator engage in large scale awareness activity will incur significant cost – and if industry is to fund the regulator due regard should be given to the levels of investment already being made by some parts of the industry. Perhaps therefore, if the regulator were to concern itself with the under-served parts of the community investments could be better targeted. For example, our research into the digital lives of vulnerable children suggests that much more could and should be done to equip and enable adults surrounding vulnerable children to engage more effectively with them. This will take significant resources, and is something the regulator should actively consider engaging in.

There is much to be done to make the UK the safest place in the world to go online and the role of the regulator is one more building block along the way. The White Paper is another, and we will continue to work with colleagues at DCMS, Home Office, DfE, UKCIS and across the sector to play our part in ensuring every child can benefit safely and securely from the internet.