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Introduction



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The Online Safety Bill is a ground-breaking piece of legislation which is set to transform the way that online services are regulated. Understandably, given the range of issues addressed by the Bill, the plans have generated an enormous amount of public interest and debate. But notable by their absence have been the voices of young people. This is despite the fact that making the internet safer for children is one of the Government's key aims in bringing forward the legislation.

With the support of our partner TalkTalk, Internet Matters wanted to address this gap and bring young people's voices into the debate. In March 2022 we conducted new research with young people aged 14-18, in which we presented key measures contained within the draft Bill (prior to its introduction into Parliament) and gathered feedback. We spoke to two groups: one made up of young people aged 14-16 and another group of those aged 17-18. This report outlines our key findings.

Perhaps the most significant takeaway is just how valuable it was to engage with young people on the Bill. We were struck by the passion with which the young people spoke about the issues, the maturity of their responses and ability to understand the complexities of what the Bill is trying to achieve and how. Most importantly they conveyed some clear priority areas which the legislation needs to address if it is to speak to the real needs and experiences of young people growing up in a digital world.

I hope these findings present a useful lens through which to the examine the effectiveness of the Bill as it makes is way through Parliament. Internet Matters will continue to champion the needs of young people and their families throughout this process and would welcome further discussion on the themes contained within this report and their implications.



Executive summary: key findings

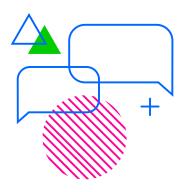
The positives and negatives of being online

- Young people felt that the online world was more of a positive than negative force in their lives. They identified particularly positive aspects as:
 - Finding out more about what's going on in the world
 - Having fun and fighting boredom
 - Connecting with people both friends they knew offline and people they didn't
- Most of the key negative impacts can be seen as the "other side of the coin" to the positives:
 - The potential for misinformation and fake news
 - Feeling a lack of control over the amount of time they spend online
 - The risks of connecting with people they didn't know offline (although this was discussed to a lesser extent than the other two).
- A key area of concern which emerged in both groups was the impact of extreme content promoting unrealistic beauty standards, and the implications for young people's body image and mental health. These concerns were raised by both boys and girls.

Response to key elements of the Online Safety Bill

 The young people felt that on the whole it was right for illegal harms to be given more weight than legal harms. However, they felt that content promoting self-harm should be treated as seriously as illegal harms and that more needed to be done to tackle less extreme content which nevertheless promotes unhealthy behaviours (e.g. extreme dieting or bulking up).

- There were mixed views on whether small and large platforms should have the same responsibilities and sanctions if things went wrong. The older group thought they should, whereas the younger group was split.
- There was consensus across the group that paid for advertising should be within scope of the Bill, including scam ads but also genuine ads that could nevertheless be harmful.
- Young people's experiences of reporting problems
 to platforms tended to be poor, but there were
 examples of good outcomes. Despite that, the
 older group felt there was not space for Ofcom (or
 another organisation) to have a function where
 users could directly bring their complaints. On the
 other hand, younger participants saw more of a role
 for this, and favoured an app as a way of getting in
 touch with it.
- Young people were deeply engaged in the discussion. They appreciated many of the complexities in what the Bill is trying to achieve and how it is going about it, reinforcing the value of engaging young people in these discussions. There was a feeling that despite being a positive step forward, lots more work was needed on the Bill. Young people cited privacy as a top priority and were interested to discuss how the Bill would impact on this.



Implications for the Online Safety Bill

This research highlights three priority areas for young people where the Online Safety Bill needs close attention as it makes its way through Parliament:

1. Legal but harmful content

- The Bill should adopt a wider definition of content harmful to children, explicitly referring to content which is harmful to children's safety but also their <u>wellbeing</u>.

2. Paid for advertising

 Policymakers and parliamentarians should scrutinise the Government's plans for online advertising in tandem to their scrutiny of the Online Safety Bill, ensuring that the two programmes are aligned and that the online advertising programme is progressed with the necessary urgency.

3. Privacy

 The Online Safety Bill needs to align closely with the Age Appropriate Design Code, and the new online safety regime will need to be implemented in a way that reinforces young people's privacy rather than compromising it.

Key findings. Theme 1: the positives of being online

We first asked the groups some questions designed to help us learn more about what role online services play in their lives.

Young people were clear in recognising the fundamental significance of being online in the modern world:

"If we didn't have it then I don't think we'd be the same people that we are today, maybe in a positive way or a negative way, I don't know." (boy, younger group)

For better or worse, going back to a world before the internet was inconceivable:

"I think I'd actually go insane. I actually think I would. I don't know, it would be so weird." (girl, 18, older group)

Participants described a range of products and services they use, including streaming services, online games, messaging apps and social media sites.

We asked each member of both groups to plot how far they agreed with the statement "Online apps and digital tech play a positive role in my life" on a scale from strongly agree to strongly disagree. The distribution in both groups was similar, with responses evenly scattered from the middle to the 'strongly agree' end. This suggests that on the whole young people thought technology played a more positive than negative role in their lives.

Young people described lots of these positives.

Finding out more about the world and what's going on

Both the older and younger groups quickly identified the value in being able to find out what was happening in the world at the click of button and get different perspectives on things. There was a sense that this gave them great freedom:

"You can really go anywhere really, anywhere you are, you can go and speak to someone, watch something, you can watch something, pad a bit of time." (boy, 16, younger group)

The older group talked about this in the context of the war in Ukraine. One girl said she had wanted to find out more about the origins of the conflict, and described her method for doing so online.

"I use Safari, I use Internet Explorer to just research a bit more... I went on Google, and then tried looking at the ones that came at the top" (girl, 18, older group)

Others in the group also reported finding out more about Ukraine using digital platforms. Some said they used social media and felt that this gave them a fuller insight into what was happening, with a greater range of perspectives represented:

"I feel like I found out more about it all than, like, not on the news, just hearing about things like seeing it on social media and stuff. But do you know when it shows, like, actual videos of the things and stuff? I found out things that I didn't know, that I didn't hear on the news and stuff." (girl, 17, older group) Some felt they would not be as informed without the internet:

"I don't think I would be as intelligent without the internet because I just look up loads of interesting things and learn from the internet, from watching videos. But without it I probably wouldn't have a lot of stuff." (boy, younger group)

Having fun and fighting boredom

Another common theme in both the older and younger groups was the value of digital technology and online platforms in enabling them to simply have fun and fight boredom. Young people described the endless entertainment provided by streaming services:

"It won't ever get boring as so many shows are out there" (boy, younger group)

Both groups also associated scrolling through social media with downtime and identified it as a way of keeping occupied. They described seeing funny content and memes. Some felt that they would become bored more easily without digital technology:

"So, I feel like if you lost the internet, then it would be like, people wouldn't know what to do with themselves." (boy, 18 older group)

Some of the younger group talked about online games being a great source of fun:

"I also like to play with my friends online, games for hours a day, that's fun as well." (boy, 15, younger group)

It was notable, however, that gaming wasn't popular with the girls in the younger group. Nor did the older group report participating in much online gaming, with a couple of boys saying this was something they did when they were younger.

Connecting with people

The social benefits of connected technology was also a strong theme across the two groups. Young people spoke about these benefits both in terms of friends they knew offline, as well as people they had met online.

Contrary to the perceptions some older people might have of online gaming, comments made in the younger group emphasised the social value of this activity:

"I just was gaming with my friends 24/7 [in lockdown]. I made new friends actually from doing that, talking to them as well, we had a chatroom." (boy, younger group)

Young people emphasised the benefit of being able to keep in touch with friends who live far away, and making new friends from different places and cultures:

"You can talk to anyone anywhere." (boy, 18, older group)

"Let's say you're at home and let's say they [friends] live far away, you're in Manchester, they're in London. You've got a way to speak to them." (boy, 14, younger group)

A participant in the younger group described how seeing content online gave them something to talk about when they saw their friends in 'real life':

"If you send stuff to your friends on it then you have stuff to talk about later on so you can meet up and talk about it." (girl, younger group)



This feeling was mirrored in the older group, the majority of whom bonded over their shared interest in 'TGF' – a popular Youtube channel with videos of men performing stunts and pranks.

Another younger participant described their feeling that socialising online gave them greater control than in the offline world:

"You can also just have the power to hang up on your friends if you don't want to speak to them any more." (girl, 15, younger group)

A more surprising use: to "do business"

A number of other helpful uses for digital technology were identified by the group. Perhaps most significantly, in the older group, a handful of participants discussed using digital platforms to "do business". One 18 year boy said he participated in day trading, while another 18 year old boy and an 18 year old girl said they were getting into crypto and NFTs (non-fungible tokens – digital assets that represent ownership of real-world items such as art or video clips). Others in the group also seemed to be exploring these too.

These markets are unregulated and therefore present risks, even though these were not acknowledged by the group.

Theme 2: the negatives of being online

Our discussions also revealed some of the negative aspects of young people's online lives. Some of these were identified by young people themselves, others were not.

Three of the main areas of negative impact identified in the discussion can be considered the flipside of the three main areas of positive impact outlines above. These are:

- Misinformation and fake news
- Time management, and
- (To a lesser extent) interacting with strangers

One more key area of concern emerged: the impact of online platform on self-esteem and body image, including content related to extreme weight loss, self harm and suicide.

Misinformation and fake news

Although they saw the value of digital technology in helping them learn about the world, young people themselves, in both groups, also raised the topics of "misinformation" (boy, 18, older group) and "fake news" (boy, 16, younger group). A girl in the younger group expressed her concern that it's quite difficult to tell true from false online and to not believe everything you see:

"It's really hard because why would you not believe something that you see, why would someone tell you a lie? But then there's so many ways and it's just the misuse of it from people that are spreading the false information and that's where it gets dangerous because you can't tell what's right." (girl, 16, younger group)

The same girl described using fact-checking, but said that she didn't fact check everything she saw.

More worrying perhaps were some cases where young people did not appear to know much about these challenges. For example, one 18 year old girl said that getting news online means it's "it's not biased". Some of the older group described getting their information about Ukraine from sources such as blog posts or social media timelines/feeds – not necessarily credible sources.

Separate to the issue of misinformation, a couple of participants in the younger group described being kept informed by simply looking at the headlines when they popped up on their phones:

"You can have notifications on your phone for Sky News. It'll just pop up, with the headline of what it is that day and then you just learn. You don't have to actually look at the article." (boy, younger group)

"Just a line, title". (boy, younger group)

While the boys appeared to consider this a positive, it raises the question of whether they are understanding the detail and context behind headlines which are designed to grab attention.

Time management

Perhaps the biggest challenge young people identified was managing their time online. Although young people appreciated the value of digital technology in keeping them entertained, many participants in both groups recognised that good quality time online could quickly turn into a less valuable activity. This seemed to be associated with a feeling of not being in control:

"You waste time on the internet without realising that you do it, and that's not always good for you". (boy, 15, younger group) Members of the older group were acutely aware of how much time they spent online, with the majority making use of the time management tools available on their phone to monitor this. Despite the issue being on their radar, many felt unable to control it – particularly during lockdown, with 12-13 hours spent online per day commonly reported, compared to around 8-9 hours per day now.

Members of the younger group used the language of "addiction" to express their concerns:

"When COVID was at its height I was spending most of my time gaming, and that was addictive to me." (boy, younger group)

Similarly to the older group, they also reported increasing their usage during lockdown:

"I think you'd end up being on it for so long in lockdown that you'd be bored of it. When it's school and stuff it's not as bad because you've only got short amounts of time to go on it but you'd literally be on it all day. I don't know, I must have watched about 20 shows because I just had the time and I'd never had the time before because of school and other responsibilities." (girl, younger group)

Participants in both groups described how they might be "more physically active" without the internet (boy 18, older group and boy, younger group). Furthermore one participant said that he would read more, while another discussed the impact on sleep:

"I'd say if I didn't have the internet I'd read books but I've got the internet so I don't read books but if I didn't then I'd start to read a lot more." (boy, younger group) "It's probably an issue towards sleep, as in, if I'm in my bed and I'm on my phone I can stay on there for hours and not fall asleep." (boy, younger group)

But in the older group there was a discussion about how far these opportunities would be used in reality by young people.

"[Some people] only want to stay at home. They're not comfortable going outside. So, I feel like if you lost the internet, then it would be like, people wouldn't know what to do with themselves." (boy, 18, older group)

Although not expressed directly by participants, it seemed that what was judged to be excessive amount of time spent online was associated with certain product features, in particular scrolling through content.

"If you're on it for ten hours a day and upwards on certain apps, you will get bored because there're only a matter of things that you can do." (boy, younger group)

Some felt the same way about video streaming services:

"It can get a bit boring after a while and you can get a bit lost in it when you don't want to get lost in it." (boy, 15, younger group).

One participant made the point that it's not just about how much time you spend online, but what you are doing online that's important to consider:

"If you're spending loads of time online doing college work or researching or doing actual useful things, then it's not really that bad. But if you're just scrolling, it's not good for you, but at the same time, it's not going to affect many people really." (girl, 18, older group)

Interacting with strangers

Many of the young people described talking to people online that they don't know in the offline world. Indeed, as set out above, they saw significant benefits in doing so – e.g. being able to connect with people from diverse backgrounds and places.

There was little direct reference from the young people to the risks involved in this. Those who mentioned it were, unsurprisingly, members of the younger group:

"Obviously there's the generic phishing and stuff where people pretend to be other people. That can be dangerous because you can end up getting groomed or just taken advantage of if you're younger and if you're naive." (girl, younger group)

"You get a few weirdos on there" (boy, 16, younger group)

Some of the younger participants described making greater use of chatrooms during the lockdown to connect with people they didn't know as a way of having fun. These participants did not overtly recognise the risks involved in this:

"I just was gaming with my friends 24/7. I made new friends actually from doing that, talking to them as well, we had a chatroom. Yes, I was just spending ages gaming over lockdown." (boy, younger group)

Young people in the younger group also described the abuse young people could receive if someone disagreed with something they posted, or the way they looked, or similar – although it was not completely clear from the discussion whether they meant from people they knew or from strangers.

"If you say one thing wrong on the internet some people could send you death threats or something." (girl, younger group)

"On social media I've seen people and they look a certain way and people might be attacking them for it and they can't do anything about it." (girl, younger group)

Self-esteem and body image

In both groups there was significant discussion about the impact of being online on young people's self-esteem. This started with recognition of the fact that many people (both their peers and celebrities) used online platforms to project idealised versions of their lives, emphasising the best parts while hiding the bits they were not as happy with.

"It only shows good things in people's lives, they only post things about good things, they don't say anything about bad things that happen so they show fake life, it's not real 100% of the time" (boy, younger group)

"Influencers can create a kind of fake life... they're not going to post everything" (girl, 18, older group)

Young people connected this content to feelings of inadequacy and poor self-esteem, and in some cases the development of mental health problems:

"You see other people's lives being perfect when yours isn't and that leads back to the point of being depressed and whatever else" (boy, younger group)

There was particular concern around seeing people with 'perfect' bodies and the impact on young people's body image. Importantly this concern was voiced by boys as well as girls.



"When they see pictures, it makes them feel insecure about themselves, when they see other people's pictures and stuff and the beauty standards and stuff. I feel like that." (girl, 17, older group)

"Some people suffer from body images on the internet with models and so on and it'd be easier for them if you didn't have that, so they thought they were the standard but their mind thinks that what they see is the normal when it's not." (boy, younger group)

However one younger participant argued that it was not necessarily always a bad thing to see people with an attractive body shape because it could be a motivating force in a young person's life:

"If you see a guy or girl how you want to look and they say how to do it and how they train, that can be a positive impact as well because then you know how to follow that stuff to get where you want to be" (boy, younger group)

Even more worryingly, participants in the younger group were quick to identify the prevalence of selfharm and suicide material on online platforms.

"Things like self-harm and stuff like that, I think that people say it's acceptable on apps and things and they encourage people to do it." (boy, younger group)

How the Online Safety Bill should approach these harms

We described to each group the draft Online Safety Bill's approach in attaching more significant duties and sanctions to illegal harms than legal harms, such as those described above.

Both groups felt that this approach was justified. One of the younger participants agreed with this because they felt platforms could do more to stop the illegal harms than legal harms:

"I think the illegal things that are more serious, they can lead to bigger things than just small things like cyber-bullying. Rather than someone attacking some other person, companies can't really control that as much as they can with the illegal things" (boy, younger group)

That being said, the younger group felt that content promoting self-harm and suicide should be treated as seriously as the illegal harms.

In the older group, the feeling was that the legal harms they themselves had encountered were fairly minor. However, there was a comment that deciding between more and less serious harms was "subjective" (boy, 18, older group).

Theme 3: the scope of the Bill

Small and large platforms

We asked young people whether they used any online services which might be considered smaller or less commonly used by other generations.

Young people described a range of smaller platforms which they used, and felt that older people might not be familiar with. The younger group identified several online games (FIFA, Call of Duty, F1) and both groups identified apps associated with gaming including Discord, which was described as "a mixture between messages and Facetime" (boy, younger group), and Twitch – although one participant noted that "there are plenty of adult gamers" (boy, younger group) who would be familiar with these.

The older participants also identified certain messaging services which were used by several members of the group. Note that this group mainly used WhatsApp to talk to family only.

We explained to each group that, under the current plans, smaller platforms would have fewer duties than larger platforms, and could receive a smaller sanction if found to have breached their duties.

The older group were in almost unanimous agreement that this was not the right approach, and that the duties/sanctions a platform had should not be dependent on size. There was recognition that "on the bigger site, it [harmful content] would probably be seen more" but that it still "doesn't make any sense." (boy, 18, older group)

This was elaborated on by a girl who drew attention to the fact that the impact on the young person is the same, regardless of whether they are on a large or small platform "Like, for an example, cyber bullying. So, the person that's going to be hurt and abused, just because it's not a larger app or like less known, that doesn't mean that the abuse would be less. It's still hurting someone. So, I feel like they deserve the same amount of, I don't know if it's punishment or whatever it is, but, yes." (girl, 18, older group)

Views were much more mixed in the younger group. Some voiced the same line of argument as in the older group:

"Let's say there's a small app that you can buy drugs on or illegal stuff on, that might be overlooked by the government and not sorted out if it's only big websites that have these things put on them." (girl, 15, younger group)

However others in the group were sympathetic to the likelihood that smaller platforms would have fewer resources than larger platforms:

"I think that for the smaller companies, they might not be able to afford or be able to put in more precautions on their apps and websites, but the bigger companies, they'll be able to afford putting things in a lot more easier than the smaller ones." (girl, 16, younger group)

Someone also echoed the point raised in the older group that larger platforms would have more of the problems owing to their size, which justified the current approach in the draft Bill:

"The bigger ones are the ones that are attracting more audiences, so more problems will probably be within the bigger apps and stuff. Obviously, the smaller ones still need controlling and stuff, making sure that everything's okay, but more stuff is likely to happen on the more mainstream apps and platforms" (girl, 14, younger group)

Paid for advertising

We explained to each group that as it stands, paid for advertising is out of scope of the Bill. At the time the discussions took place, this applied to scam ads as well as genuine (but potentially harmful) ads for goods and services (the Government has since announced that scam ads will be brought into scope, while it has launched a separate consultation on online advertising).

We asked whether the participants saw ads and if so whether they were bothered by it. The young people reported seeing ads frequently. There were mixed responses to how bothered they were about it:

"Yes, I think it can get quite annoying at times, actually. And if you click on one thing, it can bring you to another, and you click on that, it can bring you to another, and it just keeps on redirecting you to something that you wouldn't want to buy but you clicked on something that you do want to buy." (girl, 15, younger group)

"Not really. As long as I can skip it. If they make me watch the whole thing" (boy, 18, older group)

Members of the older group appeared more concerned about advertising when discussing the implications for their data privacy (see more on privacy below):

"Yes, but it's crazy because we accept it because no one really reads this whole terms and conditions, but when you press Accept Cookies, it's like the whole thing. They are literally tracking you." (girl, 18, older group)

There was also greater concern from one member of the older group when thinking about the impact of online advertising on society at large, rather than on young people's lives specifically: "So, Russia could advertise people to join the army right now, and as long as it's a paid advertisement, it'd get sent. That's obviously ridiculous...

"Also, the company's going to push that video. Like, if I post a video of some terrorism or whatever, no one's probably going to see it besides some people I know, whereas that, that's going to pushed to everyone in my area or wherever I set it, I suppose." (boy, 18, older group)

Younger participants specifically highlighted the problem of scam ads.

"The fake advertising, fake products that aren't actually real, and you order something and you think it's something else, and you've just wasted your money. And then you can't send it back or get your money back." (girl, 16, younger group)

That being said, one younger participant was sympathetic to the role of adverts in the business models of online platforms:

"They're a bit annoying but I think they're there for a reason, so the companies, you're using the app, they get money, or there's no other way they'll get money. So I think advertisement's very important." (girl, 16, younger group)

There was nevertheless consensus in both groups that advertising should addressed through the Online Safety Bill, with views that it's "horrible" (boy, 18 older group) and "obviously ridiculous" (different boy, 18, older group) for it to not be included.

Theme 4: reporting and complaints

Finally we talked to participants about reporting and making complaints to online platforms.

The majority of participants in both groups had reported something to a platform at some point. Some described more comprehensive action taken by companies:

"So many times when you try and post a video, it'll be like you're blocked from posting for, like, three days. And you've not even done anything bad. It just thinks that it might be something. They take down a lot of things all the time." (girl, 18, older group)

However there were many experiences of little action being taken in response to reports and complaints.

"I had a social media account when I was about nine, eight, ten, and I'd got my sister on there, and my other sister on there, my friends on there, and it's very embarrassing, and I've reported it multiple times, and not one of them have gone through and it's not been taken down. And it's still up there." (girl, 15, younger group)

"Videos I've seen that promote fake news or things that aren't real that I've reported, it gives you a response a few days later, but no action's taken on it, even though it does violate the terms." (girl, 16, older group)

"All they really do is just block the person. Like, they say, okay, you can report. Do you want to block them? That's it, but that person's still out there, making fake accounts, or still out there tagging other people. So, the matter's not really being dealt with. It's just on your behalf. That was my experience." (girl, 18 older group)

There was a broad sense that often nothing happened after reporting:

"They just didn't respond quickly, they just didn't do anything." (girl, 14, younger group)

Many of the reports were concerned with scam ads. It was noted by more than one participant that this was challenging for platforms to deal with because accounts would be shut down but simply pop up again.

"It was for that, something was going around, like two weeks ago, like you win a free iPhone." (boy, 18, older group)

"You get these accounts that add you that are not actual people, and they're asking you to buy stuff. And let's say you do report them, I doubt they'll be taken down. Or if they do take them down..." (girl, 15, younger group)

"They make a new one." (girl, 14, younger group)

"Yes. It takes about five minutes to make a new account." (girl, 15, younger group)

Through the Online Safety Bill, companies will be required to do more to demonstrate how they are responding to reports and complaints. We asked participants whether they thought this was sufficient, or whether they would like another organisation (e.g. Ofcom) to be able to raise complaints with (this will not be a function of Ofcom in the current plans).

Participants in the older group said that they did not think they would use this function as most of the challenges they experience online are fairly minor and can be brushed off:



"I usually just delete the chat and forget about it." (boy, 18, older group)

Many of them said they'd keep the problem to themselves, rather than tell anyone else, although some said they would tell their friends.

Similarly, younger participants said they would be unlikely to share the problem – although friends would be more likely than family. However, this group were more open to the idea of there being a separate organisation to make complaints to, even though it would need careful planning:

"Probably, but it would need to work." (girl, 16, younger group)

Theme 5: privacy

On additional theme to emerge, particularly in the older group, was the importance of privacy.

Young people reported taking proactive steps to guard their privacy. For example, they used different platforms with different groups of people in their lives to create a sense of separation.

"I feel like WhatsApp can get crowded as well. Like Telegram, sometimes, for an example, I would use Telegram for business, but WhatsApp would be, like, for my friends and family. So, it's a good separation." (girl, 18, older group)

Young people also reported setting up separate accounts on the same service so they could have greater control over who saw what.

"Me and my friends had these accounts that are private and we can just post whatever we want on them. We try and make it really funny and it's fun to rewatch each other's" (girl, 14, younger group)

Younger participants raised the issue of data privacy as a potential harm of being online

"Then there's also your digital footprint as well so if you post something, then in 20 years you can go to get a job and it ends up coming back and affecting it. It's hard, to be held accountable for something that you've done when you weren't as mature or aware of what you were doing." (girl, younger group)

When thinking about the impact of the proposals for the Online Safety Bill, some in the older group were keen to emphasise that they did not want it to compromise their privacy:

"I think [privacy is] probably the most important thing there is." (boy, 18, older group)

"I think the privacy aspect of it could be worked on. It's not a bad idea, per se. Like, they should be trying to get rid of this stuff, but not at the expense of people's privacy online." (different boy, 18, older group)

Implications for the Online Safety Bill

The young people we spoke to for this research shared the view that families commonly express to us: that change is desperately needed to ensure that young people enjoy the same rights and protections online as they do online.

The Online Safety Bill is a once in a generation opportunity to transform children and young people's online experiences. The overall approach is the right one and there is much in the draft Bill to be welcomed. But that should not stop policymakers and parliamentarians from working to ensure it is as effective as it can possibly be.

Our conversations revealed three priority areas where the Bill needs to be developed further so that it speaks to the real needs and experiences of young people. These are:

1. Legal but harmful content

The young people were clear that some of the most harmful material they see online relates to extreme beauty standards and weight loss. They described the immense pressure this content can put on young people to follow suit and the fact that this pressure can lead to the development of serious mental health problems, including depression, anxiety, self-harm and even suicide.

The draft Bill (both the previous version which was examined in pre-legislative scrutiny and the final version presented to the House) places much greater emphasis on addressing illegal content than legal but harmful content. The definition of content harmful to children in the current version of the Bill is content where there is "a material risk of significant harm to an appreciable number of children". The notion of "significant risk" appears to set too high a bar and may not capture lower-level harmful content such as that promoting extreme dieting.

Making this shift is particularly important given that the Government has not yet accepted the Law Commission's recommendation that a new criminal offence be created against encouraging someone to self-harm (although it is welcome that encouraging suicide is now a priority offence in the Bill).

The Bill should adopt a wider definition of content harmful to children, explicitly referring to content which is harmful to children's safety but also their wellbeing.

2. Paid for advertising

Young people are aware of how much advertising they see. While some of it they simply brand a nuisance, they see some as deeply damaging. Most obviously this includes scam ads, but also genuine ads.

An important step forward was taken by the Government recently when it announced that the Bill would be amended to address scam ads. But this does not address the problem of ads which could be genuine but nevertheless cause harm, either to individuals or to society.

The Government has announced a consultation into Online Advertising to explore how effective regulation in this space currently is and possible ways in which it could be strengthened. The consultation closes in early June but the timeline beyond that point is unclear.

Policymakers and parliamentarians should scrutinise the Government's plans for online advertising in tandem to their scrutiny of the Online Safety Bill, ensuring that the two programmes are aligned and that the online advertising programme is progressed with the necessary urgency.



3. Privacy

Privacy regularly emerges as a top priority for young people growing up with digital technology, and this group of young people were no different. Young people welcomed the idea of more being done by online services and regulators to improve their online lives, but they emphasised that these efforts could not compromise their privacy.

Children's data privacy is now primarily protected through the Age Appropriate Design Code (otherwise known as the Children's Code), and this will not change with the introduction with new online safety legislation. However, it is important that privacy considerations are at the forefront when the details of the online safety regime are developed – e.g. ensuring that data collected from online services by Ofcom is collected and held in a privacy-conscious way, and that age verification/assurance processes are not used to collect more data from young people than is necessary.

The Online Safety Bill needs to align closely with the Age Appropriate Design Code, and the new online safety regime will need to be implemented in a way that reinforces young people's privacy rather than compromising it.