Ofcom's engagement with children on the draft Children's Safety Codes

Protecting children from online harms consultation

Background

Ofcom has recently launched its consultation for protecting children online.

To inform this work we completed an extensive research programme, talking to more than 15,000 children and over 7,000 parents to understand online experiences and exposure to harms. Now, we want to hear children's views on the draft Children's Safety Codes we've designed, based on their experiences, to keep them safer online.

However, we are aware that the information in the consultation document is complex, detailed and includes sensitive, potentially distressing, information about online harm. Consulting children requires a tailored approach that sensitively builds their understanding of the proposals before seeking their views.

We have commissioned the multidisciplinary agency, Revealing Reality, to speak with children from across the UK, to find out what they think about our draft Children's Safety Codes. As part of this project, Revealing Reality and Ofcom are developing child-friendly materials about the codes and designing activities such as workshops in which to share these.

This will allow children's views to be fed into the consultation process and considered alongside those of everyone else who responds, meaning their voices will be heard. We expect to learn a lot from this project that will also help us when Ofcom is carrying out future research, engagement and consultation activities with children and members of the public.

The purpose of this document is to outline what we are doing, including an example approach for our project, so that stakeholders have more information about this process.

The approach we're taking to consulting children

Earlier this year, around 80 children shared their views on safety measures from our illegal harms consultation related to online grooming. To do this, Praesidio Safeguarding ran workshops in schools in England and Wales.

For the protection of children consultation, Revealing Reality will speak to between 100-120 children in the UK aged 8-17, using a mix of workshops, interviews and small group discussions.

The approach we're taking is based on the following principles.

- **Prioritising the safety and wellbeing of participants**. All participants are being given clear information upfront about what we're doing and why, and they won't take part unless both they and their parents give informed consent. We are designing the materials to balance the need to provide relevant background information about online harm that the codes are addressing, whilst also minimising the risk of distressing participants; materials will also be tailored for different age groups. We are aiming for children taking part in group discussions to be grouped with peers of a similar background (e.g. year group, age, gender), and we are developing a safeguarding protocol with clear procedures in the event that we're concerned about a child's welfare.

- **Ensuring children are heard and valued during the process.** Each participant will take part in three separate phases or 'touchpoints', so that they have the chance to digest information, reflect on this over time, and provide feedback at a few points. As well as ensuring materials are accessible, visually engaging, and that there are opportunities to ask questions, facilitators from Revealing Reality, who have experience talking to children about online safety, will use a range of techniques to ensure participants are heard e.g. active listening, positive reinforcement, equitable turn-taking. There will be multiple ways to contribute, including a mix of individual and group exercises, involving engaging, participatory activities – such as exploring scenarios and trade-offs – to support children with understanding and responding to our proposals. We will also look for ways to sense-check with children the key points raised to ensure we have accurately represented their views, and update participants when our position on the proposed measures is publicised.

- **Speaking to a diverse and broadly representative audience.** We will aim to include:
    - Children in all 4 UK nations, from a mix of geographies (e.g. urban, rural) and socio-economic groups, including looked after children
    - Children with SEND and with protected characteristics, such as minority ethnic groups, children with disabilities, and children who identify as LGBTQIA+
    - An equal number of male and female participants, as well as participants with other gender identities (e.g. non-binary)
    - Children with a mix of experiences relating to life online, including some with more limited access to devices, and others with large social media followings online (e.g. children who are considered social media influencers)
    - Children with past experience of online harm related to the consultation – such as eating disorders and self-harm. Our engagement will be participant led, for example any participants who may be in vulnerable circumstances will be able to take part in a setting they are most comfortable with (e.g. an individual interview).

    This will help us to hear a diversity of perspectives, and we will consider the feedback to identify key themes and how these differ (e.g. according to age).

How will children participate?

Each child will be asked to share their views over three phases, as follows – this deliberative approach allows children to reflect with others, and over time, on the draft Children's Safety Codes:

1. **Building context - an activity completed at home** where they watch a video about Ofcom, the Online Safety Act and the safety codes, and answer some questions about their thoughts on these.

2. **Core engagement - a workshop, small group discussion, or interview**, taking place in their local community or at school – the exact format will depend on the age and background of the child/children. During this session they will hear more about the draft Children's Safety Codes, relevant background information (e.g. what types of platforms are affected), and discuss how far they agree or disagree with the proposed measures, whether or not they think the proposed measures will be effective, and any changes they think would make them more effective. Sessions will include focused discussion on the proposed measures of the draft Children's Safety Code.

3. **Follow up and reflection -** A follow-up **activity completed at home**, similar to the first, in which children reflect on what it's been like to take part and share feedback to help inform future engagement.

What materials will children see and what questions will they be asked?

At time of writing (June 2024) we are developing the materials to use during this project. There will be different versions of these for participants, depending on their background (e.g. age), and we are also going to use these flexibly: for example, we will consider changing the wording of materials during the project if it's clear they could be made more accessible to children. We will need to be flexible in our approach in workshops or interviews depending on where the conversation goes, so that we're being led by participants.

It is also worth noting that the large number of proposed measures in the draft Children's Safety Codes means it's not possible to expect every child to feedback on every proposed measure. For this reason, we are asking children to provide more in-depth feedback on some proposed measures than others and are prioritising those that are more obviously part of the front-facing user experience for children.[1]

With this in mind, we have drafted an example approach to grouping measures and written some possible questions we could ask at different stages in the project – this is on the next page.

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[1] For example, we are planning to give lower priority to measures about the governance of an online service. The proposed governance measures relate to the management of a service and address internal monitoring, staff training, standards for employees and senior accountability, among other things. These measures do not directly relate to the front-facing user experience that children have on a service, so they have not been prioritised for in-depth discussion. We are still looking for ways that participants could provide feedback on these measures if they wanted to do so.

Draft approach for structuring Ofcom's engagement with children

Below are some questions that could be put to children as part of our deliberative engagement exercise.

During the core engagement session, each participant will focus on one theme, and related draft Children's Safety Code measures that correspond to it. The measures could be broadly themed for discussion with children as follows:

- **Access to platforms and sites** – proposed measures controlling or restricting children's ability to access certain platforms or content harmful to children

    o This theme could focus on proposed age assurance measures (e.g. AA1 – AA4)

- **Viewing age-appropriate content** – proposed measures aimed at reducing the prominence, automatic recommendation, or exposure of content harmful to children

    o This theme could include proposed recommender system measures (e.g. RS1 and RS2), content and search moderation measures (e.g. CM1, SM1 and SM2) and additional age assurance measures (e.g. AA5 and AA6)

- **Tools to give users control** – proposed measures giving children control over their response to content that is harmful to them and their interactions with other users

    o This theme could include proposed user support measures (e.g. US1 – US4) and proposed measures focussing on user reporting and feedback (e.g. UR2, UR3, RS3 and SD1)

- **User support** – proposed measures ensuring children can access clear and accessible information and guidance about a service

    o This theme could focus on proposed measures concerning the provision of information to children (e.g. US5, US6, SD2, TS2, CM7)

Possible questions for engagement

Scene setting questions could include:
- When you are online, what are the things that keep you safe?
- How would you feel if there were more things in place to keep you safe online?

Overarching questions could apply to the draft Children's Safety Codes as a whole, to individual measures, or to groups of measures. These could include:
- If online platforms had to follow Ofcom's proposals, what difference do you think this would make to you, and to other children?
- From what you have heard, what do you think about Ofcom's proposals?
- How should Ofcom's proposals work in real life, on the platforms you use, to keep children safer online? Can they be improved?
- Do you have any other reflections or suggestions for Ofcom?

The overarching questions could be revisited after sharing information with children about the proposals and completing different activities – such as:
- Describing the proposed safety measures in an accessible way
- Explaining what harms the proposed measures are trying to address – doing so in a sensitive way, tailored depending on the age, characteristics and experiences of the child participant(s)
- Scenarios about different children, to discuss the impact of proposals for different individuals
- Trade-off exercises to discuss preferences for what rules there should be to keep children safe online
- More visual exercises – e.g. picking emojis to indicate how different pieces of information, for example fictional scenarios or persona's, make the participants feel