

## A RESPONSE BY CHILDNET INTERNATIONAL TO THE

### European Commission public consultation on Safer Internet and online technologies for children

7th June 2007



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#### 1) BACKGROUND TO CHILDNET INTERNATIONAL:

Childnet is a children's charity that was set up in 1995 to help make the Internet a great and safe place for children. Childnet is an independent organisation that seeks to promote the positive use of technology, and highlight the positive things that children are doing with new technology, as well as to respond to the potential negative side, and we are active in the area of policy around safe and responsible use, as well as awareness and education <sup>1</sup>.

In 1999 Childnet undertook work for the European Commission under the EU Safer Internet Action Plan "Preparatory Actions". This work involved assessing the key safety messages for Internet safety campaigns and recommendations for awareness work <sup>2</sup> as well as the initial work and scope for the hotlines work stream with the establishment of INHOPE <sup>3</sup>. Since that time Childnet has contributed to the work of a number of Awareness Nodes, continued its support of INHOPE and run and contributed to a number of important initiatives relating to children's safe use of the Internet both in the UK and abroad. As such Childnet has a valuable contribution to the EU Safer Internet programme review.

Childnet have been working in the area of policy and education and awareness in relation to the safe and responsible use of the internet and new technologies. Childnet are active members of the UK Home Office Task Force on child protection on the Internet, and have been since its inception in 2001. As part of this work, we have been part of the group drawing up 'Good Practice Guidance for Industry':

- for chat, instant messenger, and web-based services
- for search providers,
- for moderation services
- we are currently on the group drawing up good practice in the area of social network providers.

Childnet were also active in the process leading up to the UK Mobile Operators Code of Practice for new content services.

Childnet are keen to work constructively with all relevant parties to ensure that the safety and interests of children are paramount. We are working with industry, governments, schools, other organisations, parents and children.

Childnet have developed a range of educational resources on the safe use of the internet and new technologies, for children, for parents and for teachers. Childnet have recently developed and produced a CDROM resource for parents called 'Know IT All for Parents', see <http://www.childnet-int.org/kia/>. This was produced for the Department for Education and Skills in the UK.

Childnet are currently drafting some Guidance for schools on Preventing and Responding to Cyberbullying, and the aim is to launch this in September 2007. This work has been commissioned by the UK Department for Education and Skills, and will be available online. In the drafting of this guidance, there has been extensive consultation with industry, schools, trade unions, children's organisations and children themselves.

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## **2) SUMMARY OF CHILDNET'S RESPONSE**

Childnet has very much welcomed the EU Safer Internet programmes, believing that the leadership that the EU has taken in prioritising the safe and responsible use of technology for vulnerable citizens (including children) has made an enormous contribution to ensuring that all sectors play their role in ensuring that children are safe online.

Childnet believes that at a time when information communications technology is expanding across Europe and there are significant online child protection issues<sup>4</sup>, the Safer Internet Programme should be extended and expanded beyond 2008.

In this submission we respond to the questions outlined in the Questionnaire:

### **QUESTIONNAIRE 1**

#### **Fighting illegal content**

The definition of illegal content varies from country to country due to differing cultural traditions and national legislations. It can be accessed via the Internet, through mobile phones and game consoles. Even though the definitions of what is illegal content varies across countries, from racist and discrimination material to cyber crime, fraud, hacking, identity theft etc., the production and distribution of child sexual abuse material is considered to have the most severe consequences for children, and it is illegal in most European countries.

The production and distribution of child abuse material is facilitated through commercial websites, user generated web sites and peer-to-peer/file sharing networks.

#### **1.1 In your opinion, is there a need beyond the year 2008 to pro-actively fight against illegal content?**

Yes, there remains a need to proactively fight against illegal content. The work of the hotlines, perhaps, most clearly demonstrate this. The IWF in the UK for example, reported an increase of 34% of the number of reports in 2006 compared to the year before. This may have been to a greater awareness of the IWF, but it nevertheless shows that there is a continuing need to devote attention to proactively fighting this crime. Added to this increase in the number of reports are the very worrying trends of an increase in the severity of the content, ie of the recorded abuse, and of younger children being abused in these images. Clearly the need remains to proactively fight against this crime.

It is also worth noting in this context moves in the UK towards increasing illegal content to cover non-photographic content, which is an indication of the UK Government's perspective on this issue. The Home Office has begun a consultation on the creation of a new offence of the possession of 'non-photographic visual depictions of child sexual abuse'.

**1.2 If so, please give indications on what kinds of illegal content/material should be dealt with.**

Indecent images of children should be dealt with. Childnet also see it as important to include pseudo-images and non-photographic images (including cartoons and computer-generated images). Childnet would also encourage a discussion in relation to text. Though there are clear challenges here, there is an undoubted risk inherent in some writings describing child abuse. Racist content should also be dealt with.

Other areas for consideration should be threatening or malicious communications or harassment, in reference to cyberbullying. Also there should be attention given to content promoting suicide or self-harm.

This content should be dealt with on all platforms, including mobile phones.

**1.3 Which should be the means of fighting the production and distribution of illegal content, in particular child sexual abuse material, and what stakeholders should take initiatives (industry, governments, NGOs, financial institutions etc.)? Please suggest ways in which the different stakeholders can contribute in fighting against production and online distribution of illegal content.**

A range of different organisations have a potential role to play here. Hotlines are a crucial weapon in reducing the amount of content available online, and thus the online distribution of this illegal content. For hotlines to be effective, they need to work closely with the police and industry (in order to inform law enforcement, and to inform industry to get the content taken down). In this area of reporting the public have an important role to play, because the system depends upon the reports the hotline receive from the public. It is essential then that the public are informed and aware of what hotlines are and what they do, and how and why to contact them, in order for them to better fulfil their important role. Thus awareness campaigns are important, specifically promoting the work of hotlines. In the UK the IWF have recently developed a high profile campaign which raised the profile of their organisation, but other organisations working in the internet safety education space (including NGOs, law enforcement industry and others) also need to help inform the public about their national hotline.

International cooperation of hotlines and law enforcement is vital to work against the production and distribution of illegal content.

Use of the Cleanfeed list – industry in each country should take steps to prevent access to known illegal material on the Internet. Greater cooperation with their national hotline or INHOPE will be crucial here in order to be effective.

Credit card companies – preventing use of credit card for the sale and purchase of illegal content, and taking measures against those found guilty of accessing illegal content with a credit card.

Governments can ensure the legal framework ensures that illegal material is covered and that adequate penalties ensure there is a deterrent in place, as well as effective law enforcement active in fighting this area.

Governments can also strongly encourage industry, ie providers of internet and mobile services and others, to actively support their national country hotline.

**1.4 A central element of the fight against illegal content for the Safer Internet plus Programme has been to support an international network of civilian hotlines where the public can report illegal content, should they chance upon it online. In your opinion, is this the most appropriate way of dealing with illegal content beyond 2008? How could their cooperation with law enforcement agencies be strengthened?**

Yes. Models of hotlines co-operation are essential and the work that INHOPE has done in identifying basic standards and procedures for hotlines has been crucial. Whilst there are potential benefits in terms of encouraging reporting of illegal content if it is to a non-law enforcement body, it is necessary for each hotline to have very strong and close links with law enforcement.

The system will work more effectively if there are close links between the hotline, industry and law enforcement, as this will enable both quicker and coordinated action to be taken.

It is potentially difficult for the user/reporter to know where to report illegal content, as it may depend on whether the content is hosted on the Internet or not (for example, it may have been sent to a user's phone by another user). Close cooperation between the hotline and other stakeholders is vital to ensure that these reports go to the right place.

**1.5 How can other organisations support national/local and international law enforcement agencies in dealing with the production and online distribution of illegal content?**

As mentioned in the answer to 1.3, other organisations (as well as the hotlines) can help to raise awareness of where to report illegal content (as well as informing about what illegal content is).

Other organisations can play an important role in the identification of child victims portrayed in illegal images online. For example, close liaison by law enforcement with child support agencies in victim identification operations can help to ensure that the relevant child support agencies can be in position to take on the support function for the victims immediately afterwards. It is vital that victim identification investigations do have a focus on the welfare of the victim in place, and that the relevant agencies to carry out this function are included.

**1.6 The internet has a global dimension: illegal content can be produced in one country, distributed from a second, and accessed/downloaded in many countries across the world. Please specify which actions should be taken internationally. Are there specific countries which should be focussed on?**

International cooperation is a crucial component of combating illegal content online. This involves the cooperation of hotlines, as well as law enforcement, and others. The cooperation of hotlines is vital for reports received to be forwarded to their correct national hotline for action to be taken, and the growing network of hotlines in INHOPE is important here. Cooperation between national law enforcement is vital to help victim identification, ensuring a police force takes ownership of an investigation into child abuse images for example, or ensuring that knowledge about particular images has been shared. Interpol have played a useful role here, and other international organisations can assist here, also in the area of capacity building in areas where law enforcement needs it. CEOP and the Virtual Global Task Force can play a useful role here.

Eastern Europe and Russia have been increasingly linked to child abuse image production, and there is a perceived need for capacity building at the level of law enforcement but also in terms of child support agencies in order to look after the welfare of an identified children.

**1.7 Research and development of efficient technological tools (filtering systems, image recognition etc) can contribute to reducing online distribution and indirectly the production of illegal content. Which are the subjects which should be addressed when supporting the development of technologies?**

Childnet would be keen for any development in this area to have a victim focus, ie to help the victim portrayed in the abusive image.

There have been cases where children have been successfully identified, yet images of their abuse continue to circulate and hotlines continually receive reports about them. Childnet would welcome further research into technological solutions that could work to address this issue.

**1.8 Analysis of psychological effects of victims and studies of how offenders use the Internet to distribute the evidence of the sexual abuse of children can also contribute to the fight against illegal online content. Which are the subjects which should be addressed in these areas when conducting research?**

How to support victims of this abuse. There are factors about having images of their abuse online which have the potential to make it harder for the victim to reach a level of 'closure' over their abuse. The victim may not be aware images were taken, or if they were, they may not be aware of the implications of these being taken and shared online. This realisation may come as the victim gets older. More needs to be learnt here in order to better support those who have been victim to this abuse.

**1.9 The legal situation concerning online distribution of illegal content and indeed the definitions of what is illegal differ across the EU Member States. Which are the issues which should be addressed when harmonising legal provisions across Member States?**

The harmonisation of legal provisions is an essential step in the fight against illegal material, and the possession, distribution and creation/production should be covered.

The law should be technologically neutral here, so it can apply to all media and all platforms, and in this way future-proofed.

The UK have adopted the definition of a child as under 18, in line with the UN definition. There are clear advantages in consistency here.

Consideration should be given to both photographic (including pseudo-images) and non-photographic images (ie including cartoons, and computer generated images)

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**QUESTIONNAIRE 2**

**Fighting harmful content**

Harmful content is content that potentially can be harmful or dangerous for children, and includes content which parents and carers do not want their child to have access to. It can be accessed through Internet, mobile phones and game consoles. What is considered harmful for children varies across cultures. However, in most cases it ranges from pornography, violence, racism, xenophobia, self-mutilation, anorexia, suicide sites, dangerous sects or hate speech to child sexual abuse material.

Risks for children who are exposed to harmful/unwanted content are psychological trauma and encouragement of harmful behaviour, such as violence against oneself (self-mutilation, developing eating disorders, and suicide) and others (inflicting violence or sexual abuse of others, bullying, happy slapping etc). In addition, accessing and downloading such content can give rise to security risks: viruses, spam, hacking, identity theft which may cause financial problems and damage to the computer, inadequate advertising, copyright infringement and co-participation in an illegal activity.

**2.1 In your opinion, is there a need beyond the year 2008 to pro-actively fight against harmful content? If so, please give indications on what kinds of harmful content/material (subjects to be covered) should be dealt with.**

Yes. The Internet is changing constantly and the way in which new applications and services are being made available mean that there is a continued need to fight against harmful content, including those listed above as well as inaccurate information, threats to and violence.

It is important that children are not only viewed as being exposed to harmful material, but with the development of the Internet and Web v2.0 and user-generated content, they may potentially be the creators, and thus any actions against harmful content needs to covers both these possibilities.

Education, digital literacy and e-safety are key here (see below).

**2.2 Which are the means of fighting the production and distribution of harmful content and what stakeholders (media, governments, industry, NGOs, schools etc) should take initiatives? Please suggest ways in which the different stakeholders can contribute in the fight against the online distribution of harmful content.**

Raising awareness about the potential for children to access harmful content (ie preventing access and responding to access by minors), and potentially minors creating harmful content is essential. This needs to be done at a strategic level including ensuring that teachers are trained in e-safety issues, that it is integrated into the formal curricula of schools and then taught and inspected <sup>5</sup>.

Parents too need to be better informed about the ways their children can access harmful content, and what strategies they can take to minimise the risk <sup>6</sup>.

The rating and labelling of content can assist in preventing minors accessing potentially harmful content, and there is a need for this to keep pace with the Web v2.0 environment.

Filtering, blocking and monitoring software can be a useful tool for users. In the UK there have been steps to provide a Kitemark standard for such technology to assist parents and carers in their choice of product.

Childnet would welcome the Commission encouraging the industry to do more to establish a common set of European guidelines for service providers and mobile operators, (and we welcome the European Framework for Safer Mobile use by teenagers and young children), whose products and services are being used by young children <sup>7</sup>, in relation to content and other risks facing children online.

In tandem with the support for self-regulation there needs to be effective monitoring to evaluate the effectiveness of self-regulatory measures.

There are many different forms of harmful material, as outlined above, and the different forms will need different approaches, and all stakeholders will have a role to play.

**2.3 In your opinion, should the media take an active part in the awareness rising in this sphere and in what way?**

Media have a role here and there are some excellent examples where public broadcasters or newspapers have developed effective awareness-raising campaigns. Producing a tool-kit for media professionals which gives the facts, relevant bodies and spokespeople available to comment on stories would be a very helpful resource which each Node could produce and update.

Media can work on awareness-raising particularly around:

- Promoting agreed definitions and giving young people a language with which to talk about harmful content
- Providing public forums and examples of discussion publicly – ensuring that young people understand that harmful content and the associated issues are legitimate issues for discussion
- Signposting resources and agencies

**2.4 Which role could education have in empowering children to deal appropriately with harmful content? Should it be integrated into school curricula? If so, which would be the best ways of doing so?**

Education of children and parents and carers can greatly empower children to deal with harmful content. One example of how you can effectively help empower young children to deal with this is the tip of switching off the screen immediately to remove the content from their view and then tell a parent or carer. It remains important that parents are aware that being approachable about such issues is crucial for them to be in a position to help children.

Schools are the most effective way to ensure that every child has a minimum level of education and awareness about safe use of the internet.

Childnet has produced education resources which show where this subject is best covered in the Citizenship, PSHE and ICT curriculum<sup>8</sup>. Ensuring that this issue is brought into the mainstream of the curriculum is crucial.

Plus for an awareness programme to be most effective this issue also needs to be integrated into the teaching of initial teacher trainers. Again Childnet has piloted this approach in the UK and has evidence to show that this would be welcomed by initial teacher trainers (irrespective of their subject matter) and how it can be integrated into their programme of study<sup>9</sup>.

The categories, impacts, and approaches for dealing effectively with the range of harmful material that children may encounter need to be understood by teachers, school staff, and leaders. Education and support for this needs to take place at various levels, but particularly needs embedding into Initial Teacher Training, continuing professional development and leadership support and development. There is also a need for whole school community (staff, parents and carers, pupils) approaches to raising and addressing the associated issues.

Dealing with harmful content needs to be integrated into the curriculum in terms of e-safety and digital literacy, both of which cut across the whole of the curriculum but have particular relevance to ICT, Citizenship and Personal Social and Health Education (PSHE). Again, this needs to be done in terms of identifying and addressing the different kinds of harmful material, and in terms of the context of the particular subject (eg introducing 'dealing with harmful content' as an explicit element of the component skills for e-safety competency within ICT).

**2.5 A primary activity of the fight against harmful content for the Safer Internet plus Programme has been to support an international network of awareness nodes which promote public campaigns informing the public of the risks linked to the use of online technologies and on safeguard measures. In your opinion, is this the most appropriate way of dealing with harmful content beyond 2008? If so, please indicate in what ways this line of action can be strengthened.**

Nodes can be a great way of ensuring the experience, awareness activities and lessons learned from these can be shared between countries. However, there is an important coordinating role there: the node needs to be aware of what activities are taking place within their country, and be in a position to share these.

If the Nodes are focussing on delivering awareness programmes themselves, there is the risk of overlooking other initiatives within the country.

Whilst each country will have different issues to deal with (for example the maturity of the industry, the extent of the media interest, the local concerns and incidents of abuse, etc,) it is increasingly important that there is within the Nodes a greater commitment to basic standards activity and some co-ordination of their work-plan. To this extent the current co-ordination of the Nodes has been much improved in recent years, but the establishment of best practice, greater sharing and co-ordination of work packages does need to be extended and built on.

One of the most effective targets for each Node would be the mainstreaming of the education and awareness work from separate “campaigns” and websites into the national schools curriculum, work of law enforcement harm reduction programmes and industry campaigns. It is only in this regard that the education and awareness work and advice to parents and children will be sustained and effectively rolled out longer-term. In order to be effective, it is important for the Nodes to work better to ensure that all schools are integrating E-safety into their work.

**2.6 Efficient technologies can help to make the use of the Internet, mobile phones and game consoles safer for children to use (eg. filtering software by Internet Service Providers or at user’s computer, age verification mechanisms etc). Which are the subjects which should be addressed when supporting the development of technological tools?**

A robust, scalable age verification system is seen by many as a solution to many of the child safety issues online, and Childnet see that this could provide a useful tool. On mobile we have seen age verification used to determine who can access material and services suitable for those 18 and over, though credit cards have been an important tool here.

In addition to having such technologies available it is imperative to make sure that there is good awareness and understanding of these tools. In order to be effective, they need to be known about, they need to be simple to use or activate, and they need to be trusted.

Efficiency in technologies in relation to filtering is important. For example overblocking on the part of the software can lead to families giving up on the software, and can also be very frustrating for schools that can’t access educational sites which are deemed to belong to an inappropriate site. A more efficient means would be refining the blocking process so that specific pages were blocked, rather than whole domains, as well as some very fast (say, via password) way to unblock pages and sites for spontaneous use within schools.

**2.7 Research on sociological issues and analysis of psychological effects of particularly of the harm to children on different kinds of harmful content can contribute to building knowledge about how to deal with these issues. Which are the subjects which should be addressed in these areas when conducting research?**

How children conceptualise, define and identify harmful material? What do children consider harmful?

How children come into contact with harmful material, both unintentionally and otherwise?

What impact does seeing harmful material have on young people and children’s behaviour?

How do children respond to contact with harmful material, do they have information about this or other ways for dealing with this?

Addiction or excessive use of technology to the detriment of other areas of young people’s lives, can be harmful, and an area in need of further exploration.

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## **QUESTIONNAIRE 3**

### **User- generated content and online communication**

Children and adults alike use online technologies for communication. It takes place in a number of different ways; through mobiles, e-mail exchange, sites which facilitate users to create profiles, virtual networks, image exchange sites, Instant Messaging Services, blogs, chats and peer-to-peer services, dating sites and other “social networking sites” and user interactive services. Amongst others, the risks for children using these features are grooming, disclosure of sensitive personal information/images, exposure to harmful content (pornography, sexual speech, violence etc) encouragement to harmful behaviour (e.g. happy slapping”), bullying and harassment.

Internet allows both children and adults to create their own content (“user-generated content”) and make it accessible to other users through Internet or mobile phones. Children are particularly vulnerable as they more easily disclose sensitive personal data (information and images), they sometimes engage in behaviour that is risky to themselves and can quickly get out of hand. They can also get traumatic experiences when confronted with illegal and harmful content or conduct. In addition, their use is in some cases associated with copyright infringement.

### **3.1 Which are the best means of addressing these risks with the aim of child online protection, in particular grooming and bullying? Which stakeholders should be responsible for initiatives in this field, and what roles should they have (industry, media, governments, schools, NGOs etc)?**

Education and awareness of children and young people, and of those responsible for them is a key part of addressing the risks of grooming and bullying, and there is a role to be played here by all stakeholders. The service providers for example need to have clear and prominent information on how to keep safe while using their service for their users, and also think about how to communicate key messages to parents and carers and teachers and schools.

There is great value in having a coordinated approach in terms of education and awareness, to ensure consistency in messages. Without consistency in messages there is the danger that the end audience may be confused by a variety of different messages portrayed in different ways. To achieve this, those involved in these activities need to consult with each other, for example, industry, NGOs and government and other organisations involved in this work.

The Government has a role to ensure that pupils know how to stay safe online as part of the push towards ICT literacy. Schools and parents have a large role to play in terms of e-safety, digital literacy, and in entering into conversation with young people about their online and technological practices.

The service providers need to ensure that their service provides the user with the tools they need in order to take control of their activities. Minimum requirements for service providers here include providing blocking tools, reporting tools, safety advice, and clear terms of service/boundaries of acceptable behaviour. The UK Home Office Task force on child protection on the internet have produced several good practice documents for service providers, including chat and instant messenger providers, search providers, and are currently working on one for social network providers. See <http://www.police.homeoffice.gov.uk/operational-policing/crime-disorder/child-protection-taskforce>. As well as providing these tools, it is crucial that users are made aware of them and can both find them and use them easily.

Governments need to ensure that the legal framework covers this area – grooming, malicious communications. There is also an important role to ensure that any self-regulation is working, for example there may be a role in assessing the implementation of any agreed good practice or minimum requirements.

Childnet are developing guidance for schools on preventing and responding to cyberbullying, and have done this for the Department for Education and Skills in the UK. This will be launched in September 2007.

Childnet believe that schools blocking use of technology, for example, social network and user-generated content sites sends out messages to children that these are not legitimate areas of activity for school and may inhibit the reporting of their misuse. In addition, teachers and school staff may be unable to both exploit the educational potential of these technologies and familiarise themselves with their students online activities.

Childnet are exploring the positive and creative value of user-generated content sites for both formal and informal education, social participation and citizenship. We are currently working on the Digizen project, which consists of research and associated activities and aims to provide schools with practical advice on using user-generated content and social network sites within schools and addressing risk management issues. We will be running a competition in parallel with our research to highlight and showcase young people’s use of web 2.0 tools to produce resources for their peers around the issue of tackling cyberbullying.

**3.2 Can you name further, not listed risks or further potentially dangerous forms of communication? Which are the best means and ways of addressing them?**

Clearly there are other dangerous forms of communication including threats of violence to be posted on to the internet and we have seen in America how those intent on causing harm have used the internet to publicise their intended or executed actions. Other potential risks to children not mentioned earlier include the creation and promotion of self harm, suicide, and eating disorder websites, the ease in which young people can access adult gambling sites, as well as peer-to-peer services which open up a range of security and content risks to young people.

With all these potentially dangerous forms of communication developing it is imperative that media education and E-safety education is taught in schools and that children are equipped to think critically when assessing information online. This needs to be coupled with effective technology tools which can help block and filter harmful content and greater leadership from industry as to how they better support their customers through choice of restricting some services for young people, (for example mobile phone providers allowing restricted services for young people) as well as providing better advice, reporting mechanisms and efficient take down services.

**3.3. Which role could education have in empowering children to deal appropriately with harmful and illegal user-generated content? Should such issues be integrated into school curricula? If so, which would be the best ways of doing so?**

Yes – see 2.4 above. This needs to be approached across the curriculum in terms of e-safety, digital literacy and information management, and within specific competencies and topics with in ICT, Citizenship and PHSE.

Childnet believes that there needs to be a greater recognition that an important part of education and awareness programmes should involve children and young people themselves in showcasing their own education resources and inspire peers for positive self and collective expression. We would recommend that funding should be made available to encourage a national and international programme which actively encourages children to positively exploit the positive content generating technologies to educate their peers and inspire children in using the new technologies safely and positively.

**3.4 Should the media take an active part in the awareness-raising in this sphere and in what way?**

Yes- see 2.3 above.

**3.5 A central element for the Safer Internet plus Programme in making Internet safer for children has been to support an international network of awareness nodes which promote public campaigns informing the public of the risks linked to the use of online technologies and on safeguard measures. In your opinion, is this the most appropriate way of dealing with communication risks and user-generated content beyond 2008? If so, please indicate in what ways this line of action can be strengthened.**

Nodes can assist in the coordination of awareness and education work of NGOs and governments. But industry needs to share good practice internationally in the same way. National departments for education or schools should also be involved in this and the Nodes could be playing a far more strategic role in ensuring that the education work in the country becomes “mainstreamed” within the formal curriculum of schools.. It would be good to know how effective the nodes have been in terms of reaching schools and the general public.

The recent working of the Nodes to identify best practice and share knowledge across countries has been excellent and more needs to be done in this regard.

In addition there needs to be support for stronger industry self-regulation codes and agreement of minimum standards.

**3.6 Development of efficient technologies can help to make the use of the online communication safer (e.g. monitoring social networking sites, age verification systems etc). Which are the subjects which should be addressed when supporting the development of technologies within this field?**

Age differentiation – some technological solutions may be more appropriate for younger age groups (ie moderation, age verification).

There could be more research into the development of peer-led monitoring within online communities – how to effectively mobilise members to manage their own communities. There is little guidance on managing and implementing this effectively.

**3.7 Research on sociological issues concerning use of online technologies, particularly how children themselves perceive risks, how offenders use online technologies to get into contact with children, the effects of grooming and bullying on children, as well as analysis of effective awareness-raising methods, can help to understand better how trends, behaviours and risks evolve in the society and to formulate awareness-raising initiatives in this field. Which are the subjects which should be addressed in these areas when conducting research?**

Research and evaluation work needs to be carried out on finding out how to effectively communicate with children and young people about internet safety issues, as well as communication to parents and teachers.

The incidents of addiction to internet gaming sites and the extent to which children are missing out on other offline activities.

**3.8 The legal situation concerning grooming online differs across the EU Member States. Which are the issues which should be addressed when harmonising legal provisions across the Member States?**

Childnet are a strong supporter for the introduction of a grooming offence into legislation, and our original paper on this (from 2001 which relates to the UK, <http://www.childnet-int.org/downloads/online-grooming.pdf>) outlines the reasons why, though particularly it allows the law to step in before a child is hurt.

There are some important considerations to address when looking to introduce such legal provisions that relate to its effectiveness. The legislation will need to provide a clear deterrent against engaging in grooming activity. Enabling covert sting operations by law enforcement is a powerful deterrent here, and ensuring that there is the possibility of such police activities within the legislation would be important to include. The advantages of ensuring such proactive police approaches include:

- the facilitation of gaining appropriate and adequate evidence,
- it acts as a powerful deterrent, as an offender can never be certain they are not talking to and grooming a police officer
- it would lead to an increase in arrests, and has the potential to enable prosecution without having to involve a child through the potential trauma that court process and procedures can often bring.

For such operations to be successful, there would need to be transparency and accountability of police actions to ensure that ‘entrapment’ techniques were not being used.

## NOTES

1: See [www.childnet.com](http://www.childnet.com) for further information on Childnet including links to its award-winning projects.

2: See [www.netaware.org](http://www.netaware.org)

3: See [www.inhope.org](http://www.inhope.org)

4: Including a growth in the incidents of cyber-bullying,

5: Childnet has done a great deal of work in this regard including undertaking research with initial teacher training institutions in the UK to see where the subject of E-Safety can be taught at the teacher training and integrated into the curriculum.

6: Childnet has worked with the DfES in the UK to produce a ground-breaking resource for parents called 'Know IT All' This resource helps educate parents about e-safety issues and has sections in 7 different languages. Schools can order this free of charge in bulk quantities. –see [www.childnet-int.org/kia](http://www.childnet-int.org/kia)

7: For example encouraging schemes such as the The European Telecommunications Standards Institute (ETSI) proposed “child aware” kitemark

8: See Childnet’s submission to the Qualifications and Curriculum Agency on the importance of intergrating E-safety into the curriculum at [www.childnet-int.org/news](http://www.childnet-int.org/news) (May 2007 article).

9: Childnet’s research into where E-Safety can be taught in Initial Teacher Training involved responses from over 400 trainees in 4 institutions and was funded by The TDA and Microsoft. The report will be published on the Childnet website in late June 07.