



Younger children and social networking sites:
a blind spot

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Foreword

At around 11 years old, most children in the UK leave behind the familiarity of their local primary school and begin travelling to a much larger secondary school with many new faces and many new pressures, social and personal as well as educational. To speed up the process of adjustment, to find new friends quickly and to ensure they are accepted by their peers, around half join social networking sites even though they are below the age intended or catered to by those sites. As the NSPCC's timely report reveals, the consequences can be troubling, with an estimated one in four 11 and 12 year olds having been upset on a social networking site.

This report raises an equally timely question, what should be done? Facebook (the most commonly used site) protects those who declare themselves under 18, but to avoid the difficulty of gaining parental consent for those under 13 (required by the USA's Children's Online Privacy Protection Act), they assume no under 13s have a profile. As a result, many young children spend time in an environment designed for older teens and adults. If they must have claimed an age over 18 to access the site, their profiles could be public and fully searchable by anyone.

Should social networking sites work harder to prevent under 13s using their service? Or, should they institute a reliable procedure to gain parental permission for younger children so they can meet their needs properly? Or, instead, should they leave things as they are, letting children learn to deal with what life brings? I hope this report stimulates an informed discussion among public policy makers and private companies in the best interests of children.

There are already many pressures on children and parents. For the most part, social networking sites – and the internet more generally – represent a fantastic opportunity for children to make friends, share humour and interests, and learn to stretch their wings. But online as offline, society needs to let them do this at their own pace, in environments that respect privacy and safety as long as those are needed, and with reliable back-up systems in case things go wrong.

For the past few years, we have watched as most young people have converged on Facebook. But now, just as adults are acquiring their own profiles, young people are turning elsewhere – to Twitter, Tumblr and Instagram and, more worryingly, to unregulated sites which provide few or no protections for children. This raises further public policy challenges, as the NSPCC report also emphasises. Serious consideration to the recommendations with which this report ends is, therefore, urgently needed.

Professor Sonia Livingstone, London School of Economics and Political Science

Executive Summary

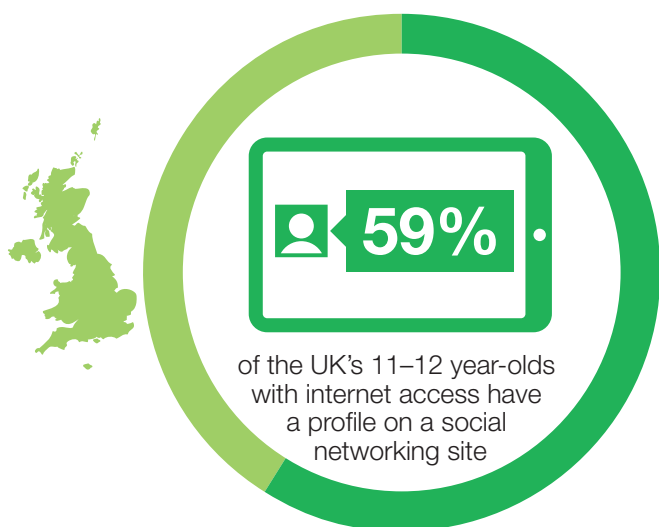
"Now, of course, a free and open internet is vital. But in no other market and with no other industry do we have such an extraordinarily light touch when it comes to protecting our children. Children can't go into the shops or the cinema and buy things meant for adults or have adult experiences; we rightly regulate to protect them. But when it comes to the internet, in the balance between freedom and responsibility we've neglected our responsibility to children... So we've got to be more active, more aware, more responsible about what happens online. And when I say we I mean we collectively: governments, parents, internet providers and platforms, educators and charities."

David Cameron, speech on 24 July 2013¹

"Many providers ban users under 13 and apply particular technical protection mechanisms and moderated services for minors under 18. However, age restrictions are only partially effective. Fewer younger than older children use social networking sites, but many 'underage' children are still using these services. It seems clear that measures to ensure that under-aged users are rejected or deleted from the service are not successful on the top social networking site services used by children in Europe."

UKCCIS Evidence Group²

Social networking sites: The numbers



Social networking sites are very popular with children and young people and offer users opportunities to socialize, learn, have fun and be creative in new ways through the integration of different functions such as photo sharing, blogging, game playing and instant messaging.

New research from the NSPCC³ has found that almost a quarter (23 per cent) of 11 and 12 year olds who have a profile on a social networking site say that they have been upset by something on it over the last year. These experiences range from trolling to online stalking to being asked to send a sexual message. While most of these children were able to recover from what they encountered quickly, around one fifth felt upset or scared for weeks or months after the incident occurred. A fifth of those who experienced something that upset them told us that they experienced this every day or almost every day. Furthermore, the evidence indicates that these upsetting and frightening experiences are not merely an extension of what is happening in the playground. Worryingly, children reported that over half of these experiences were caused by strangers, people they only knew online, or they did not know who caused it.



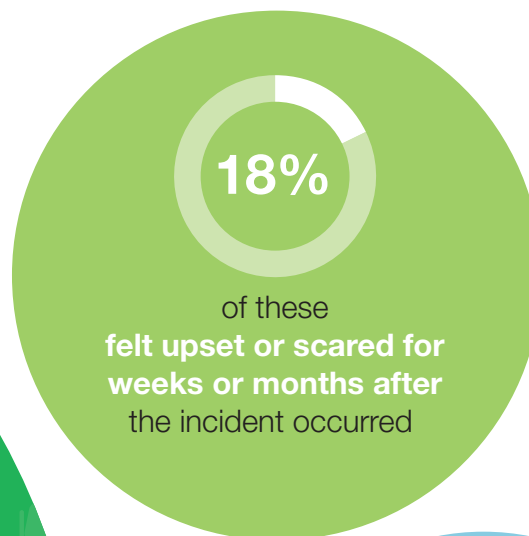
¹ Available at: <https://www.gov.uk/government/speeches/the-internet-and-pornography-prime-minister-calls-for-action>

² Livingstone, S., Davidson, J., Bryce, J., Millwood Hargrave, A., Grove-Hills, J. (2012) *Children's Online Activities: Risks and Safety, the UK Evidence Base*. A report prepared for the UK Council for Child Internet Safety by the UKCCIS Evidence Group. Available at: http://www.saferinternet.org.uk/downloads/Research_Highlights/UKCCIS_Report_2012.pdf

³ The NSPCC surveyed 1024 children aged 11–16 years old. 28% were aged 11–12 years. Of this group, 23% had a negative experience online.



of 11 and 12 year olds with a social networking site profile say that they have been **upset by something** on it over the last year.



of these felt **upset or scared** for weeks or months after the incident occurred



told us they experienced something that upset them **every day or almost every day**



of these experiences were caused by **strangers or people they only knew online**



It is encouraging that 11 and 12 year olds are more likely than children aged 13 to 16 to turn to parents for help when they are upset by something they see on a social networking site. However, parents are not always certain what advice to give, and some are not aware that most popular social networking sites have a minimum age of 13.

Some of the most popular sites, such as Facebook, Twitter and YouTube, require users to be over the age of 13 to have a profile. There is reliable evidence from a variety of sources that large numbers of children under the age of 13 are active users of these sites⁴. We estimate that around half of all the UK's 11 and 12 year olds (666,000 children) have a profile on a social networking site for which the minimum age is at least 13⁵. In many cases parents are aware that their child has a profile, and may have helped them to set it up.

Some of the providers of social networking sites with a minimum age of 13 say that they do not provide bespoke advice for children under the age of 13, because they are not supposed to have a profile on their sites. There is a lack of robust age verification tools and children lie about their age in order to obtain profiles. It is very difficult for providers to ascertain which profiles are underage 12 year old users and which are legitimate 13 year old users. Other providers are concerned that providing bespoke advice to underage users would put them in breach of the American legal and regulatory framework by which

they are governed – a framework primarily designed to protect children under 13 years old from inappropriate advertising. In this respect the American regulation which is designed to protect children under 13 is a false friend, and may be doing more harm than good by discouraging sites from providing adequate protection to their younger users. The NSPCC challenges these providers to take a more pragmatic approach to protecting children, and rise to the challenge of the large number of children under the age of 13 who are on their sites. These sites may not be directly targeting younger children, but sites which appeal to teenage users will inevitably attract tweens, who imitate older peers.

Providers should acknowledge their responsibility to these children and their parents, and improve the way they respond to the safety of younger users, for example by working harder to keep them off their sites, setting the privacy settings to the highest level possible, and by providing a range of ways for reporting illegal or offensive content which have been tested with children to ensure they are child-friendly.

Self-regulation has had some impact, but there is a need for UK based agencies to play a greater role in working with social networking sites to find solutions, and in improving the information available to parents to help them make informed decisions about the risks and benefits of social networking for their children.

4 Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom; Livingstone, S., Haddon, L., Görzig, A., & Ólafsson, K. (2010). *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>

5 See appendix 2 for how these figures were calculated. This figure does not take into account the number of children under 11 years old who have social networking profiles on sites with a minimum age of 13.

Percentage of 11–12 year-olds
with social networking site profiles


63%
Facebook


45%
YouTube


30%
Moshi Monsters


28%
Club Penguin


28%
Twitter


15%
Google Plus+






1% Chatroulette
3% Habbo Hotel
3% Pinterest
4% Tumblr
8% Instagram

NSPCC research, December 2012. Base: children aged 11–12 years who had a social networking account.

Section 1: 11 and 12 year olds' use of social networking sites

Social networking sites offer all users, including children, opportunities to communicate, create and learn through the different functions they provide. But as well as the benefits, social networking sites also present new risks to people of any age. Many of the most popular social networking sites among 11 and 12 year olds, including Facebook, Youtube and Twitter, have a minimum age of 13; the risks associated with these sites may be amplified if they are presented to children who are too young to cope with them. NSPCC research shows that almost half of all 11 and 12 year olds have a profile on a social networking site with a minimum age of at least 13. In real terms that's around 666,000 children⁶.

Although many of the most popular social networking sites have a minimum age of 13 years, research has found that there is a significant jump in the numbers of children who have profiles at the age of 11 compared to those who have profiles at the age of 10⁷. The transition to secondary school may trigger this rise in social networking, possibly as children want to play a full part in the social networks of their new school and stay in touch with friends from their former school, both online and offline.



Facebook got bigger in secondary school



You go on it (Facebook) to fit in. Also if you are on it people won't talk behind your back

It is questionable whether younger children are able to cope with the images and activities they witness on social networking sites. Research suggests that adolescence is a crucial time for the development of certain areas of the brain⁸. The brain's pre frontal cortex, which controls functions like decision making, self-awareness and understanding others, develops enormously during adolescence. Prior to the development of the pre-frontal cortex, children are much less likely to have the emotional regulation and resilience necessary to cope with the full range of things they might see or experience in environments not designed for them. An example of this is sexual content. In the absence of any context, and without being developmentally ready to view such content, children may experience depictions of sex and sexuality as confusing and potentially distressing.

We know that in one year across the internet as a whole 13 per cent of UK children experienced something which has upset or bothered them⁹. New NSPCC research shows that 23 per cent of 11 and 12 year old users of social networking sites experienced something that upset or bothered them. Social networking is a popular activity with so many children in the UK, and this study establishes for the first time the experiences children were having on those sites which upset or bothered them, who was involved in upsetting them and how they dealt with the experience.

⁶ See appendix 2 for how these figures were calculated. This figure does not take into account the number of children under 11 years old who have social networking profiles on sites with a minimum age of 13

⁷ Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom. P. 85. Age 10 = 19%; age 11 = 40%.

⁸ Blakemore, S.J. (2010) The Developing Social Brain: Implications for Education. *Neuron* 65, March 25 2010.

⁹ Livingstone, S., Haddon, L., Görzig, A., & Ólafsson, K. (2010). *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>



Section 2: The experiences of younger children¹⁰

Experience of things which have bothered them



It's people raging on gaming sites that I don't like – they swear into their microphones.



I have seen images posted on a friend's wall that I have found upsetting.



I don't like being hacked – I have been hacked on Facebook and Twitter.



People will ask you really personal stuff on Facebook that they wouldn't dare ask in real life.



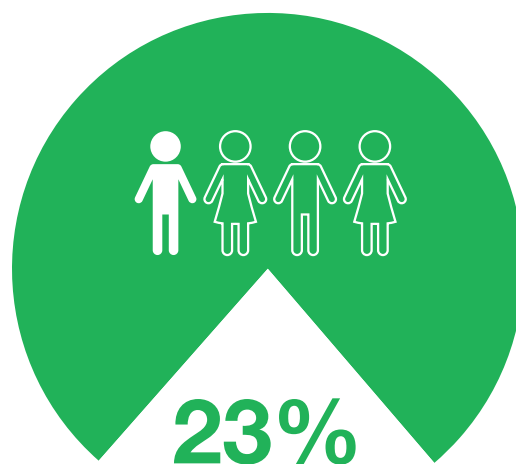
I think people sometimes say things on social networks that they wouldn't say to you in real life.

Almost a quarter (23 per cent) of 11 and 12 year olds who had a profile on a social networking site experienced something on the site which upset them during the last year.

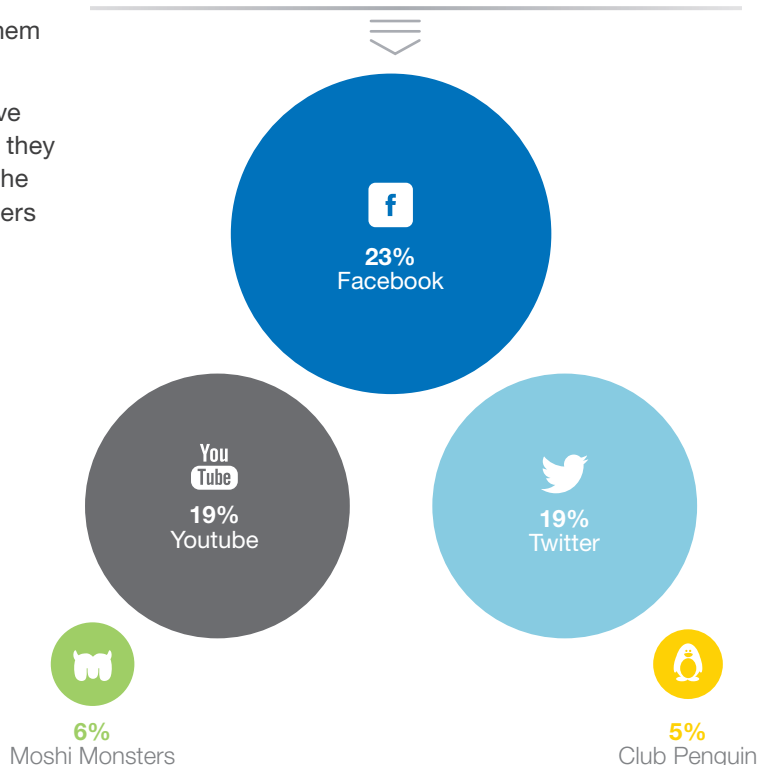
However, younger children were more likely to have experienced something that bothered them when they were using sites aimed at an older audience. On the sites aimed at younger children, like Moshi Monsters and Club Penguin, a smaller percentage of young children experienced something that upset them.

¹⁰ The evidence we cite in this report is drawn from three main sources: (1) New NSPCC research about the experience of 11–16 year olds on social networking sites, conducted December 2012 (see Appendix 1 for more information on methodology); (2) Livingstone, S., Haddon, L., Görzig, A., & Ólafsson, K. (2010). *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>; (3) Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom

Percentage of upsetting experiences from most popular sites



of 11-12 year-old SNS users
experienced something that had
upset them

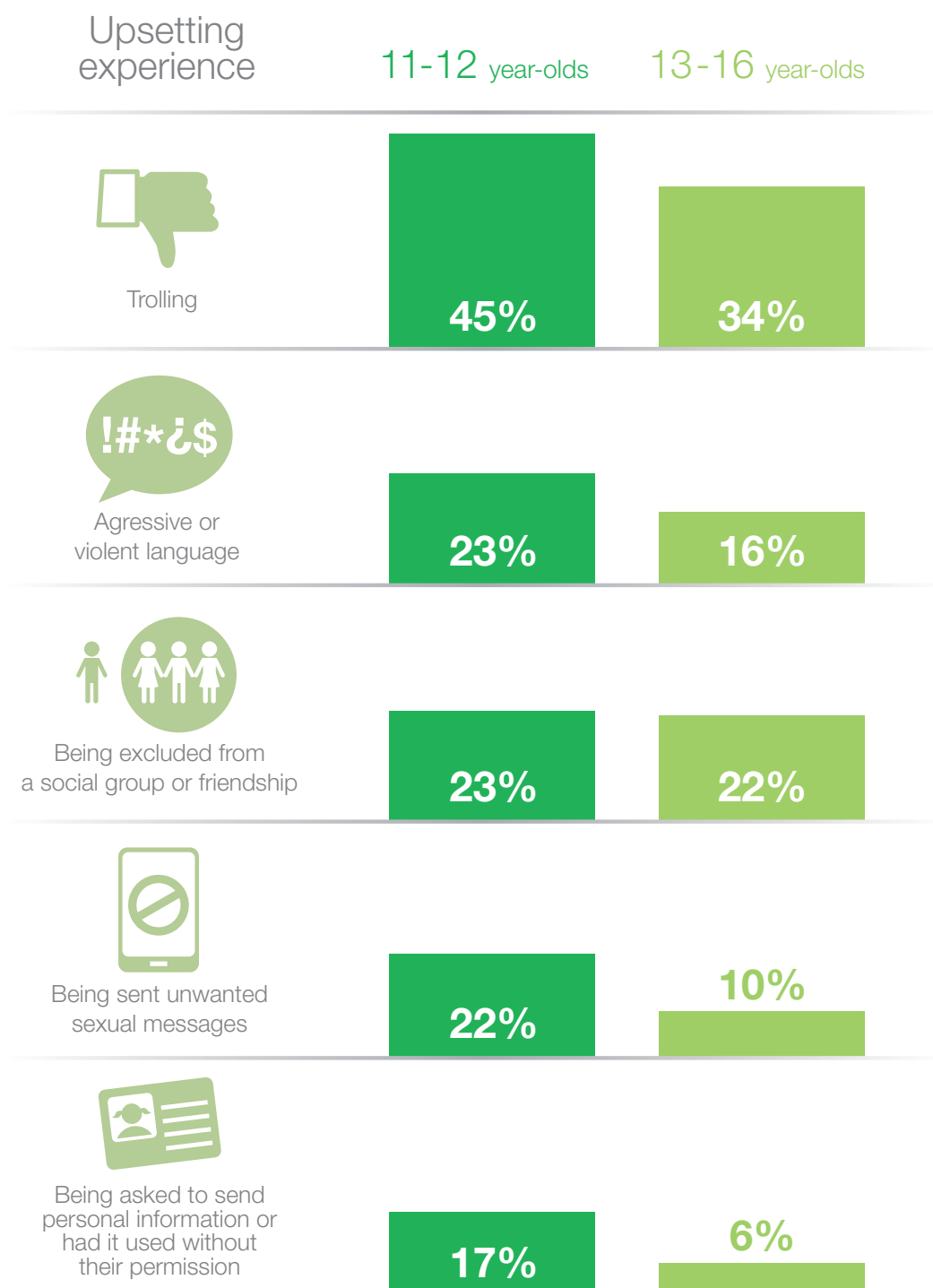


Source: NSPCC research. Base: All 11–12 year olds who had a social networking account: Facebook: 171; YouTube: 119; Twitter: 60; Moshi Monsters: 70; Club Penguin: 64. We have only included the five most popular sites as the sample size for other sites was too small.

Experience of particular things

The main issues that the 11 and 12 year olds who answered our survey faced while using social networking sites that upset them are listed below.

Difference in upsetting experiences between 11–12 and 13–16 year-olds



Source: NSPCC research. Base: all 11 and 12 year olds who experienced something that upset them

The 11 and 12 year olds surveyed were significantly more likely than 13 to 16 year olds to say they had been upset by being sent unwanted sexual messages, and being asked to send personal information, or having had personal information used without their permission. A greater proportion of 11 and 12 year olds surveyed compared to the 13 to 16 year olds reported being upset by their experiences of trolling, aggressive or violent language and being excluded from a social group of friendship. Young children may encounter these negative experiences more frequently than older children, possibly because they lack the skills and experience to use social networking sites in a way that can minimise these experiences. Younger children may find experiences such as trolling or being asked to send personal information more upsetting or threatening than older children do, particularly if have less experience of navigating the online world.

In addition to these experiences, a small number of 11 and 12 year old children in our survey had experienced even more serious risks via social networking sites, such as online stalking, being asked to send a sexual message and being encouraged to hurt themselves. The numbers who did so were too small to draw any conclusions, and further research is needed. Nevertheless, this deeply concerning result is consistent with other trends that we are seeing. ChildLine has received a marked increase in the number of contacts relating to online stalking in the last few years. During 2012–13, ChildLine dealt with over 100 counselling sessions where young people specifically mentioned online stalking¹¹. Additionally, contacts to ChildLine about self-harm have risen dramatically in recent years and self-harm is the fourth most common reason for children to contact ChildLine¹².

Experiences of 11 and 12 year olds

I had nasty stuff about someone I know as a friend who is gay. When I told them they didn't know what they were talking about they posted really horrible things. I blocked them. They go to my school and was worried they would say stuff to my face

Girl, 12

I'm being bullied through Facebook. The person goes to my school so I know they're really tough which is making me more scared. They've said some really aggressive things. I don't know what to do – if I tell someone I'll get called a grass or I might get beaten up by the bully. I'm just so worried.

Girl, 12

I get teased at school a lot because of my weight but recently people have started to post nasty things about me. I don't know who I should talk to about it because my teacher isn't very supportive.

Boy, 11

I'm feeling so down. I'm being bullied over Facebook and it's starting to get me really worried. The things they're saying keeps getting worse and worse so I'm struggling to cope. I don't want to tell my parents because I know they'll constantly worry. I'm starting to feel like it would be better if I just wasn't here.

Gender Unknown, 12

I don't want to tell my parents because I know they'll constantly worry

if I tell someone I'll get called a grass or I might get beaten up by the bully.

Somebody asked me what school I go to and I didn't tell them.

¹¹ A specific category of cyber-stalking was introduced in 2012 in response to the increasing number of children contacting ChildLine about the issue.

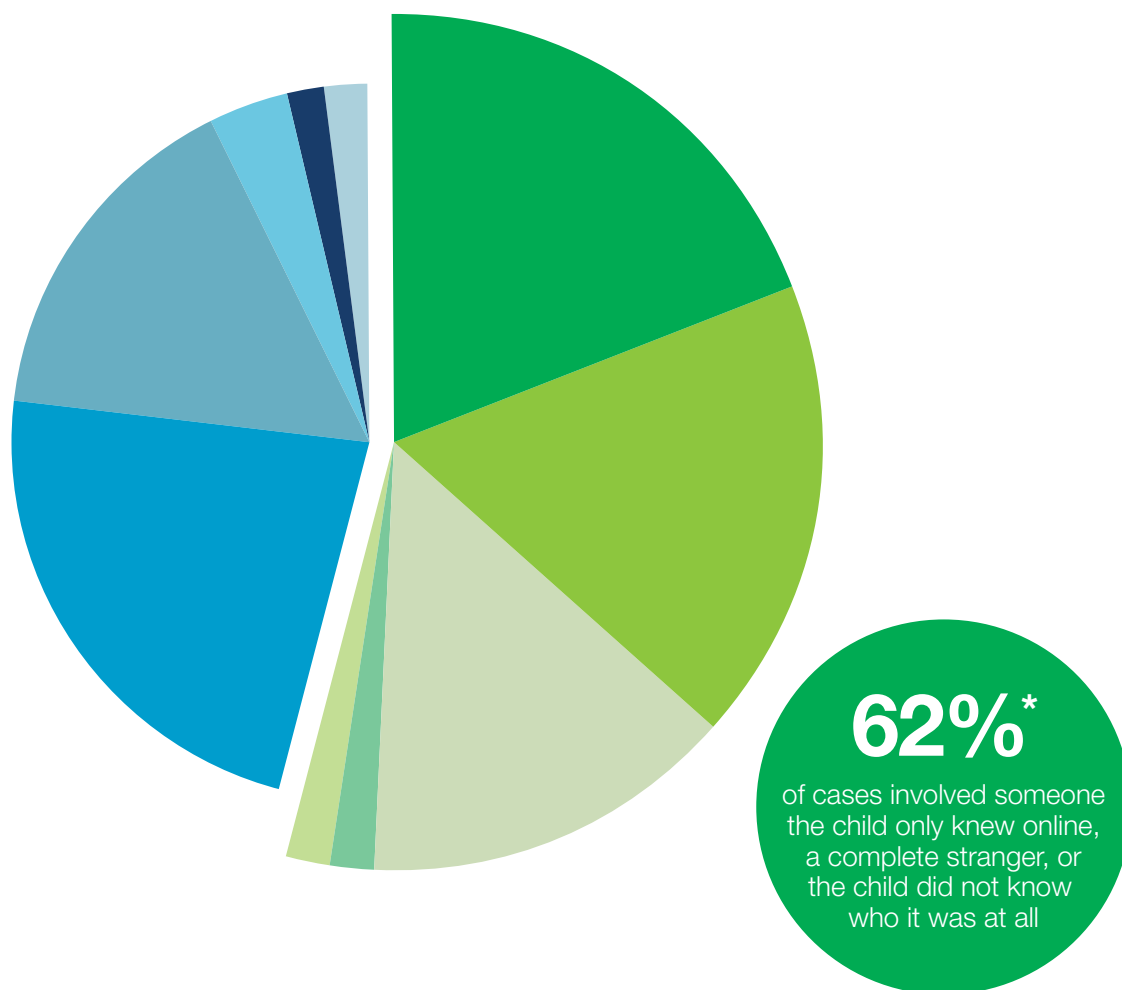
¹² Harker, L., Jutte, S., Murphy, T., Bentley, H., Miller, P., Fitch, K., (2013) *How safe are our children?* London: NSPCC, pp29.

Who children identified as responsible

In over half the cases reported by 11 and 12 year olds, the person or people responsible were identified as someone the child only knew online, a complete

stranger, or the child did not know who it was at all. A fifth of 11 and 12 year olds identified the person or people responsible for this behaviour as 'a complete stranger'. Although the number of 11 and 12 year olds who responded to these questions was relatively small, the results are concerning and indicate further research is needed.

Who children identified as the person or people responsible for the behaviour they experienced



*Percentages do not add up to 100 as respondents could select multiple options

How they felt

When we asked 11 and 12 year olds in more detail how they felt about thing which had upset them on a social networking site, unsurprisingly their feelings were overwhelmingly negative. A third reported feeling ashamed/embarrassed or humiliated, another third felt vulnerable and a fifth felt threatened or betrayed. Many younger children may not be resilient enough to cope with the experiences they are having on social networking sites, particularly those designed for an older audience.

The majority of 11 and 12 year olds were no longer upset about their experience within a few days. However, around a fifth (18 per cent) felt upset for a few weeks or months.



I felt vulnerable not knowing what they were going to do next



Scary, frightening, intimidating – I wished I was dead

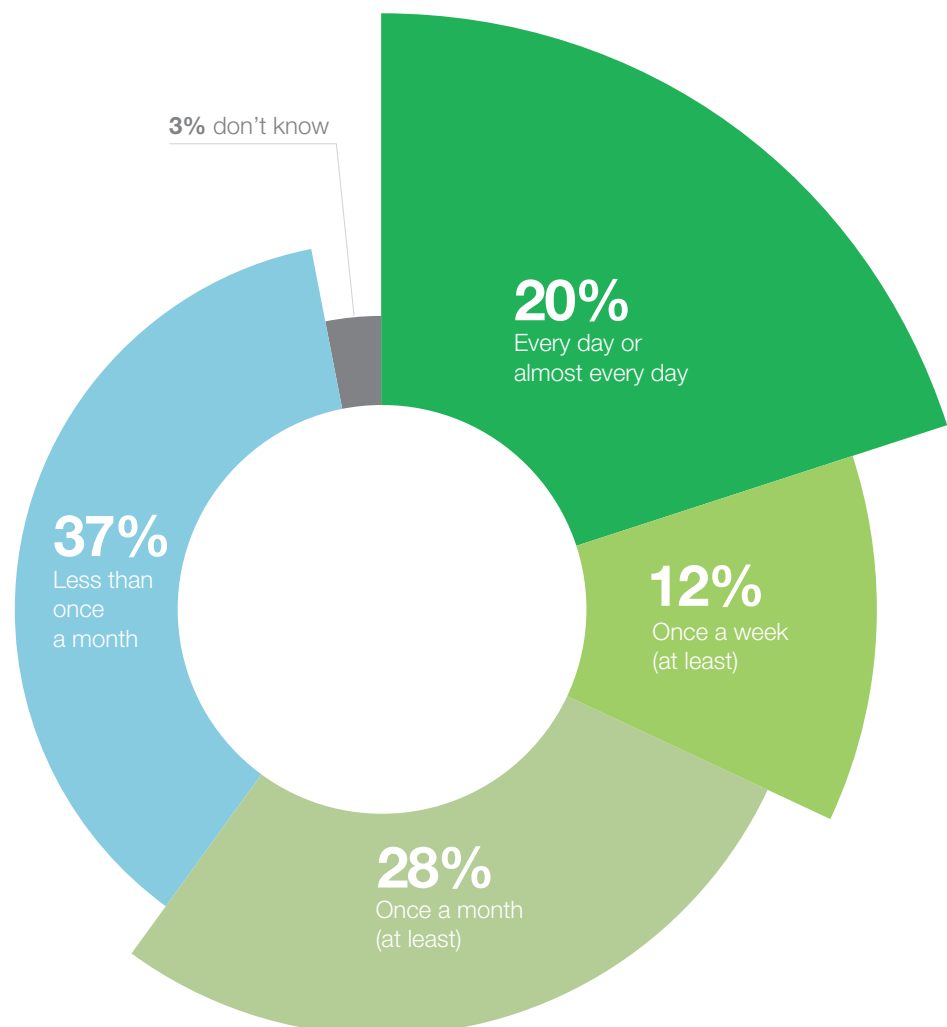
Frequency

These negative experiences are rarely one-offs. Sixty per cent of 11 and 12 year olds who had experienced something negative said they experienced this at least once a month. A fifth of the 11 and 12 year olds experienced something negative every day. The frequency with which some children were facing negative issues may indicate that these children lacked the confidence or skills to resolve the situation themselves or to seek help.



I think Facebook can be a horrible place sometimes. Some people who say they are friends gang up on you and then get others who are your friend to be horrid to you online and everyone then knows that you are not liked. It can be very upsetting

Frequency of upsetting experiences



Source: NSPCC research. Base: all 11 and 12 year olds who experienced something that upset them.



Actions taken

When they have been upset or bothered by something on a social networking site, the responses of younger children tend to be less assertive than older children. The disparities are striking: the 11 and 12 year olds were significantly more likely than older children to stop using the website for a while (34 per cent vs. 19 per cent) and to stop using the internet for a while (14 per cent vs. 3 per cent), and proportionately more likely to shut down their account completely (12 per cent vs. 8 per cent) as a response to what they experienced.



I was abused on YouTube when I commented on a video someone had uploaded, so I no longer comment on there.

Eleven and twelve year olds were less likely than older children to seek to regain control of their social networking experience by, for example, changing their privacy or contact settings (12 per cent of 11 and 12 year olds vs. 20 per cent of 13 to 16 year olds), and significantly less likely to block the person or people from contacting them in the future (18 per cent vs. 34 per cent). These differences in responses may be as a result of lower confidence and assertiveness levels, and also linked with their level of skill in navigating the website.

Only one in ten 11 and 12 year olds chose to report experiences that upset them to the social networking provider. This low number could be due to the fact that they do not want to highlight to the provider that they are under age, and so do not report. However, reporting levels are similar to those for older children (10 per cent vs. 11 per cent of 13 to 16 year olds), suggesting that there are other explanations for this low level of reporting.

One in five 12 to 15 year olds with a social networking profile do not know how to report worrying, nasty or offensive material to the website provider¹³. A comparable figure is not available for younger

children, but it is likely that younger children are less aware of this feature of social networking sites. Research has shown that 11 and 12 year olds are less likely than 13 and 16 years olds to say they know how to take a variety of actions online which could help to keep themselves safe, such as changing privacy settings on a social networking profile or blocking messages from someone they do not want to hear from¹⁴.

Of those 11 and 12 year old children who knew how to change their privacy settings, 25 per cent said they had their profile set to public; of those who did not know how to change their privacy settings, 31 per cent had them set to public¹⁵. Ensuring children know how to change their privacy settings can make a significant difference to the level of risk they encounter. The industry has a role to play in highlighting the availability of privacy settings and reporting tools, and in making them as easy as possible to use so that there is not a skill barrier to using them.



hard to report someone or make a complaint, sometimes hidden within the help pages and even then you can only report people you are friends with so you have to be a friend before reporting them – defeats the whole object....



YouTube is full of bad language, racism etc. they would have to remove and stop all comments but they have not done this

An encouraging finding is that younger children are more likely than older children to talk to someone else about their experience (30 per cent of 11 and 12 year olds vs. 19 per cent of 13 to 16 year olds). For the majority of the younger children (81 per cent) the person they approach would be a parent or carer. At 11 or 12 years old, children may be receptive to messages from their parents and this is a golden opportunity to talk to them about the benefits and risks of online social networking.



I talked to my father, he's very clever on computers and showed me what to do/how to deal with it.

13 Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom. pp94 The report does not provide a figure for younger children.

14 Livingstone, S., Haddon, L., Görzig, A., & Ólafsson, K. (2010). *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>

15 Professor Sonia Livingstone, speaking at Digital Youth Symposium held in Dublin, Nov 02, 2012. Recording available at: <http://www.dit.ie/digitalyouth/video/>

Section 3: The role of parents

I didn't realise at first the person was a stranger, my mum realised there was a problem when she checked my account and saw I had made friends with people who she realised I didn't know. They had then been sending horrible messages. Mum helped me to block them. (Girl, 11)

Many parents find themselves caught in a dilemma. They do not want their children to be excluded from social activities online, but they are also aware that sites may not be appropriate for their child. Parents in the UK are trying hard to strike the right balance: 69 per cent of 9 to 12 year olds say that their parents have imposed some rules over their use of social networking sites, for example only letting them use them under supervision or with permission, or not letting them use them at all¹⁶.

The good news for parents is that when restrictions are imposed, younger children generally adhere to them. Only three per cent of nine year olds whose parents ban their use of social networking sites have a profile. As they become teenagers more will ignore parental bans, although this is still a minority. Thirty per cent of 16 year olds whose parents ban their use of social networking sites have a profile¹⁷.

Among children whose parents impose no restrictions, most have a social networking site, ranging from 71 per cent of nine year olds to 92 per cent of 16 year olds¹⁸. Some parents are happy for their child to use social networking sites. One study found that three quarters of parents of 12 year olds who had a social networking account said they had helped the child

gain access¹⁹. There may be other parents who need the confidence and support to say 'no' if they do not think their child is ready to go on a particular site.

Nearly half (45 per cent) of all parents whose child had an under-age profile on Facebook either did not know that there is a minimum age requirement, were unsure what it is, or underestimated the minimum age requirement²⁰. The reported data was only available for Facebook due to its popularity, but the findings are likely to be similar for other sites which have an age restriction. The lack of parental knowledge that there is a minimum age requirement of 13 highlights the need for awareness raising activities to be undertaken by social networking sites with a set a minimum age limit.

Sites that do not have a minimum age requirement also carry risks to children, as do those which are not covered by any form of robust regulation. This is a fast-paced industry, with new sites emerging regularly. Parents need advice on how to navigate the options available, while allowing their child to participate in age-appropriate social activities online.

16 Livingstone, S., Haddon, L., Görzig, A., & Ólafsson, K. (2010). *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>

17 Livingstone, S., Ólafsson, K. & Staksrud, E. (2013) Risky Social Networking Practice Among "Underage" Users: Lessons for Evidence-Based Policy *The Journal of Computer-Mediated Communication* 18 (2013) 303–320 pp310

18 *ibid*.

19 boyd, d., Hargittai, E., Schultz, J., & Palfrey, J. (2011). Why parents help their children lie to Facebook about age: Unintended consequences of the 'Children's Online Privacy Protection Act.' *First Monday*, 16(11).

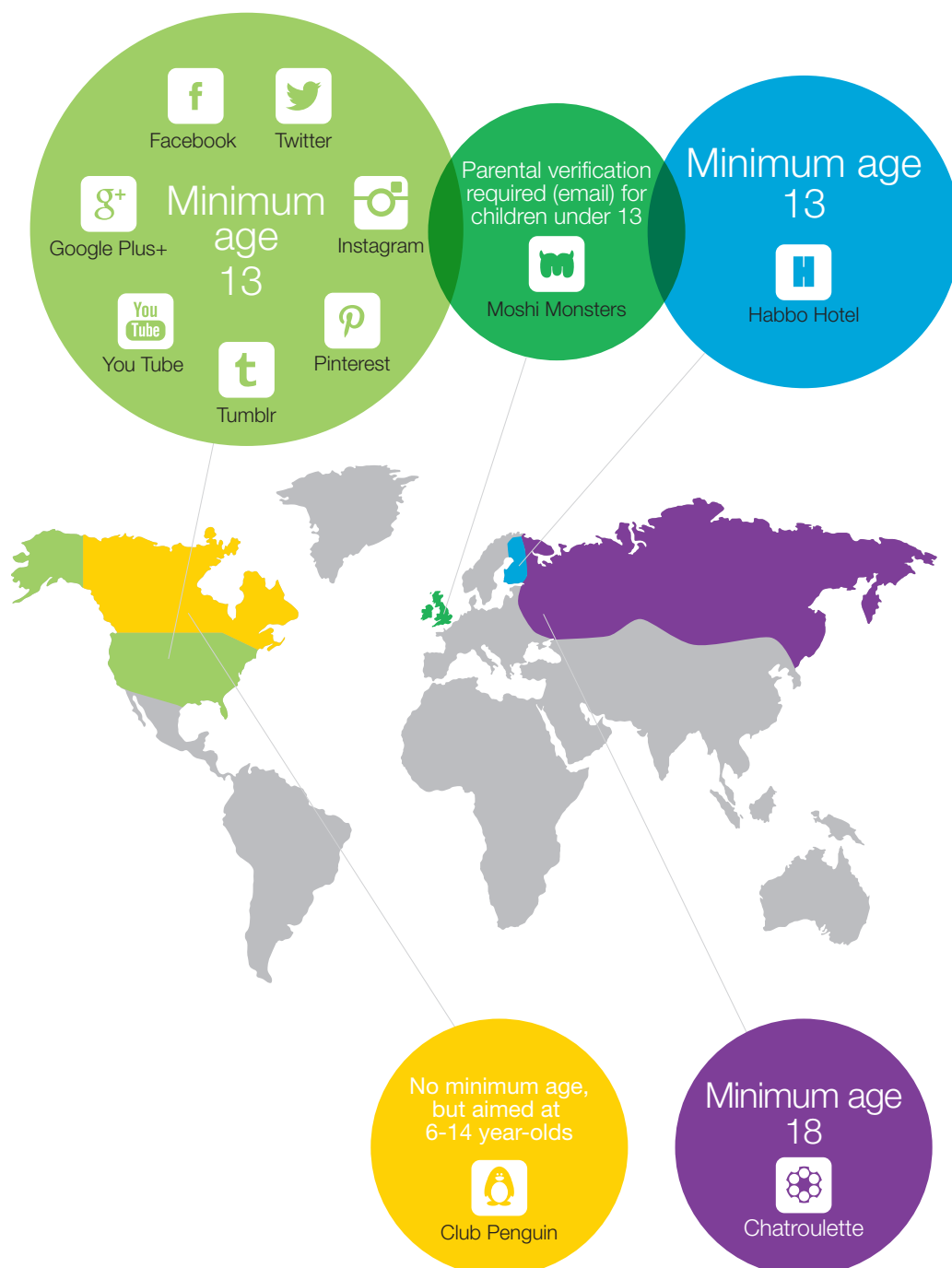
20 20% parents do not know there is a minimum age requirement, 5% parents know there is a minimum age requirement but are unsure of the exact age, 8% parents believe there is no minimum age requirement, 11% parents know there is a minimum age requirement but think that it is under 13. In contrast 24% parents think correctly that the minimum age requirement is 13, and 31% parents believe that it is over 13. Source: Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom.

Section 4: The role of social network providers and regulation

Providers of social networking sites have a corporate and social responsibility to create as safe an environment as is possible for their users. However, the legal and regulatory frameworks governing social networking sites are complex.

Different legal and regulatory frameworks govern social networking sites depending on where they are based creating an incredibly complex picture. New sites that originate in countries with weak regulation or ineffective enforcement are of particular concern, but even the sites in countries with stronger regulation struggle to enforce minimum age requirements.

Minimum age requirements for the most popular social networking sites used by 11–12 year-olds in the UK



Self-regulation has had limited impact

At European level, several self-regulation initiatives have been taken by the information and communications technology (ICT) industry with the support of the European Commission. One of these is the Safer Social Networking Principles²¹, a self-regulatory agreement signed by the major social networking services providers active in Europe. The Safer Social Networking Principles are:

1. Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner
2. Work towards ensuring that services are age-appropriate for the intended audience
3. Empower users through tools and technology
4. Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service
5. Respond to notifications of illegal content or conduct
6. Enable and encourage users to employ a safe approach to personal information and privacy
7. Assess the means for reviewing illegal or prohibited content/conduct

The establishment of these Principles has provided a benchmark of what sites should provide as a minimum, and on some sites it is now easier to employ privacy settings, find safety information and use safety tools than it was before they existed.

However, unless industry self-regulation becomes more effective, children's safety will depend substantially on their own skills and practices. Since younger children than anticipated by site developers are using social networking sites in ways contra to the Principles, it should be of concern that between a quarter and a third – and a considerably higher fraction of younger users – cannot find safety information, block unwanted messages or change their privacy settings²².

The European Commission ran independent assessments of the implementation of the Principles in 2010–2011²³. Out of the 11 sites currently most popular with UK 11 and 12 year olds, 8 have never been assessed at all²⁴. Given that some of these sites were founded as far back as 2005, it is unclear why they have not been assessed. In addition, sites which are based outside the EU, like Chatroulette, face no pressure to adhere to the Principles.

In the UK a self-regulation model is also used. In 2010, the UK Council for Child Internet Safety²⁵ produced good practice guidance for the providers of social networking sites²⁶. The Information Commissioner's Office has recognised that children of a similar age can have different levels of maturity and understanding, and that this should be borne in mind by companies operating online, who cannot always rely on the information provided by users about their age. They recommend that 'some form of parental consent would normally be required before collecting personal data from children under 12' but that this depends on the level of risk and should be assessed on a case by case basis²⁷.

Age restrictions are not enforced

The most popular social networking sites, like Facebook, YouTube (Google) and Twitter are American companies, and therefore are governed by the Children's Online Privacy Protection Act 1998 (COPPA), which is a Federal Law in the USA. COPPA governs the data collection and advertising practices for every big commercial American company that operates over the internet. The COPPA Rule²⁸ states that if a commercial website is directed to children under the age of 13 and collects personal information from them, then they must make reasonable efforts to ensure that verifiable consent is obtained from the parent of that child. Obtaining verifiable parental consent is not easy to achieve over the internet, therefore the most popular social networking sites state that users should be over the age of 13 so that parental consent is not required. Individual nation states can impose an age requirement higher than

21 Available at: <https://ec.europa.eu/digital-agenda/en/safer-social-networking-principles-eu>

22 Livingstone, S., Ólafsson, K. & Staksrud, E. (2013) Risky Social Networking Practice Among "Underage" Users: Lessons for Evidence-Based Policy *The Journal of Computer-Mediated Communication* 18 (2013) 303–320.

23 These are available at: <http://www.saferinternet.eu/web/insafe-inhope/safer-social-networking-second-assessment>.

24 Moshi Monsters, Club Penguin, Twitter, GooglePlus, Instagram, Tumblr, Pinterest, Chatroulette

25 UKCCIS is a group of more than 200 organisations across the government, industry, law enforcement, academia and charity sectors, who work in partnership to help keep children safe online. Its executive board is chaired by government ministers.

26 See <http://media.education.gov.uk/assets/files/industry%20guidance%20%20%20social%20networking.pdf> [Accessed 11.10.13]

27 Information Commissioner's Office (2010) *Personal information online code of practice*. Wilmslow: Information Commissioners Office. Available at: http://www.ico.org.uk/~_/media/documents/library/Data_Protection/Detailed_specialist_guides/personal_information_online_cop.pdf

28 See www.coppa.org

13. For example, the minimum age requirement to have a Google account in Spain is 14 and 16 in the Netherlands²⁹.

Some social networking sites with a minimum age of 13 do not provide bespoke advice for children under the age of 13 because these children are not supposed to have a profile on their sites, and their user data tells them that no child under 13 has a profile on the site. Other social networking sites with minimum age requirements are concerned that providing bespoke advice for children under 13, would put them in breach of COPPA because it would imply that they know children under 13 are on their site even though the site does not seek parental consent. Ironically, the law which is designed to protect children may actually be stopping social networking sites from taking a pragmatic approach to protecting underage children.

The dilemma for regulators and policy makers in individual countries and in the European Union is to ensure that younger children in their countries are not inadvertently harmed because of the policies that govern how these sites operate, whether they are based in America or elsewhere.

²⁹ Age Requirements on Google Accounts accessed from: <http://support.google.com/accounts/bin/answer.py?hl=en&answer=1350409>



Section 5: Recommendations



They don't check that some one is the age they say.



I have reported one abuse and they did NOTHING.

The genie is out of the bottle. Large numbers of younger children are accessing social networking sites that are not intended for them, and as a result are being exposed to risk of harm. Parents are trying hard to work out how to keep their children safe online without the benefit of easily accessible information about both the risks and the benefits of social networking. It can be difficult for providers, many of whom take their child protection responsibilities seriously, to identify underage users on their sites. Other, often less well established sites and those based in countries with ineffective regulation make little or no effort at all to protect children, including those who are younger, from risks.

It is clear that the efforts of social networking sites, regulators, parents, child safety advocates and professionals working with children to keep children younger than 13 off sites aimed at older audiences are not working. This leaves children under the age of 13, who are using social networking sites, in a 'blind spot', where, while no one denies there is an issue, little is being done to fix it.

Recommendations to keep younger children safer on social networking sites

1. **Social networking sites should acknowledge that large numbers of children under the age of 13 are using their sites.** From this should follow a range of activities that would increase the protection offered to younger children:
 - a. Social networking sites which have a minimum age should be transparent about what that age is, do more to make parents aware of what the age is, and to make parents aware of the particular risks younger children face on their site. The providers of the most popular social networking sites in the UK should also do more to keep underage users off their sites.
 - b. Providers should ensure there is a range of options for how to report illegal or offensive or bullying content or behaviour, and these should be tested by children of a range of ages to ensure that they are easy to find and use, and that there is no skill barrier involved

in doing so. In addition to the option to report content, social networking sites operating in the UK should promote an easy route for younger users to seek support and help via ChildLine.

- c. Default privacy settings should be set to the highest levels possible.
- d. The most popular sites in the UK should produce a transparent annual child safety audit, outlining the progress they have made that year with the aim of improving child safety, and detailing, for example, how many underage accounts they have removed, how many reports from children were received, what they were about and how they were dealt with. They should make these annual audits available for independent evaluation, and take action based on their findings.
- e. Sites should provide incentives to new users to take a safety and etiquette tutorial when they sign up. This tutorial should include safety information such as how to use reporting tools, how to maximise privacy settings and why this is important, how to share personal information safely and what the possible consequences of not doing so might be, as well as reiterating the idea that behind every social networking profile there is a real person who should be treated with respect. Users could be incentivized to take this tutorial by the use of a rewards system – for example by gaining credits for playing online games when they successfully complete the tutorial, or for example, by being unable to put a profile picture up until they have completed the tutorial.
- f. Sites should develop pop up, in line reminders of safe or good practice. These should appear in a timely manner whenever a particular action or activity is about to happen e.g. posting a picture. Such pop ups could appear on every occasion the behaviour in question takes place, for example during the first three months of membership, and then appear randomly thereafter depending on the volume of transactions.

Self-regulation at EU level is proving slow and ponderous, with no imminent prospect of progress. We therefore see a larger role for UK based agencies.

2. **Ofcom should play a greater role in providing information for parents** about social networking sites, and the risks children face on them. They could do this by:

- a. Including questions about the harm children report they experience on the social networking sites that they use, and what action was taken, in their annual 'Children and Parents: Media Use and Attitudes' tracker survey.
 - b. Publishing information for parents about which social networking sites are designed in a way which is likely to minimize risk and which provide tools to support children when they have seen or experienced something troubling. This would fall under their media literacy duty. This information could also be useful to those making decisions about which social networking sites to advertise on.
3. In 2010 UKCCIS published 'Good practice guidance for the providers of social networking and other user-interactive services'³⁰. **The UKCCIS Executive Board should make tackling the risks children, including younger children, experience on them a priority issue.** This would include forming a project group to identify possible solutions and highlight good practice, as well as what might be done to protect children on sites which are subject to ineffective or nonexistent regulation in their country of origin. UKCCIS should also be responsible for the independent evaluation of the annual child safety audits we have suggested that sites produce at para 1(d).

As with all aspects of child safety online there is an on-going need to build the digital judgment of children and young people, so that they know how to communicate respectfully with others online, how to protect themselves online, and so that they have the resilience and confidence to deal with risks and issues they encounter as they arise.

Key gaps in our knowledge

It has been argued that "it is in children's best interests that younger ones do not use social networking sites (or at least, those used also by adults) unless appropriate safety features are in place. In other words, we suggest that the risk (to privacy, safety and self-esteem for children) is likely to outweigh the benefits of social networking site use"³¹.

The NSPCC supports this precautionary approach and the need for further qualitative research to explore the interplay between children's wish to be on social networking sites, parents' concerns and technological opportunities and risks.

Research is needed to understand the motivations of younger children who set up profiles on social networking sites, as well as the reasons why other younger children choose not to do so. Research has been undertaken into the reasons teenagers are interested in using social networking³². Their reasons include opportunities for self-expression and creating their own space away from adult surveillance. It is important to understand why a younger audience uses social networking sites in order to keep them safe more effectively. Their motivations may be the same as older children, they may be mimicking the behavior of older children or they may want to fit in because of peer pressure.

Linked to this, it is crucial that further research is done around younger children's perceptions of risk on social networking sites: despite the risks which exist, and the age limit of 13, many of them judge the benefits of having a social networking profile to outweigh the risks. Are there safer ways to provide them with what they perceive as the benefits?

Finally, we need to know more about the experiences and behaviour of specific groups of children on social networking sites. A more refined picture can help target interventions and policy to help keep these different groups of children safe on social networking sites. Our research found that 11 and 12 year old boys were more likely to cite the person responsible for the behaviour which upset them as being a complete stranger than 11 and 12 year old girls were (30 per cent vs. 13 per cent). For 13 and 14 year old girls, the person responsible was significantly more likely to be a friend they knew face to face, than it was for boys (64 per cent vs. 15 per cent). Until there is more information available about the experiences children are having on social networking sites, it will not be possible to devise nuanced, effective prevention methods. Social networking site operators themselves provide the key to unlocking this information.

30 <http://media.education.gov.uk/assets/files/industry%20guidance%20%20%20social%20networking.pdf>

31 Livingstone, S., Ólafsson, K. & Staksrud, E. (2013) Risky Social Networking Practice Among "Underage" Users: Lessons for Evidence-Based Policy *The Journal of Computer-Mediated Communication* 18 (2013) 303–320.

32 Livingstone, S. "Taking risky opportunities in youthful content creation: teenagers' use of social networking sites for intimacy, privacy and self-expression." *New Media & Society* 10.3 (2008): 393–411.

Appendix 1: Methodology and ethics

Methodology, consent and ethics

In December 2012, the NSPCC conducted an online self completion survey of 1024 11 to 16 year olds in the UK. Interviewees were recruited by a market research agency, ResearchBods, who had a pre-existing panel of over 45,000 children. Interviewees received a written explanation of the research aims before signing a consent form. Their parents had previously given their consent for their child(ren) to be part of the online panel, and were given the opportunity to opt-out of this particular survey due to its sensitive nature. Each interviewee received a modest honorarium. Questionnaire completion lasted an average of seven minutes, and comprised of a series of questions presented online.

The NSPCC's Research Ethics Committee approved the research methodology and appropriate protocols were put in place to ensure that the rights and well-being of children were protected during the research process. These included:

- The right to opt out of answering any or all questions, without penalty
- Obtaining informed consent from both children and parents
- Clear signposting to ChildLine
- Information about how to complain
- Information about anonymity and confidentiality, data storage and publication of findings

Twenty eight per cent of the sample was aged 11 and 12. We did not sample children younger than the age of 11 because of the ethical issues involved, which would have significantly added to the cost of the research. For results based on the total sample, we can say with 95 per cent confidence that the error margin attributable to sampling and other random effects is +/- 3.06 per cent. For results based on 11 and 12 year olds (n=280), the margin of sampling error is +/- 5.86 per cent.

Appendix 2: Population data

This annex sets out more detail on data sources.

Population Data

Our estimates are based on 2012 mid-year population estimates that is available for all four nations of the UK and is based on the 2011 census. Data for England and Wales was downloaded from the Office for National Statistics website; Northern Ireland data is from the Northern Ireland Statistics and Research Agency and Scottish data is from the General Register Office. The table shows the data we used.

	Number	Rounded to the nearest 1000
Total 0–17 population (E, W, NI, S)	13,524,338	13,524,000
9 year olds		
England	582,500	583,000
Wales	31,900	32,000
NI	21,828	22,000
Scotland	52,757	53,000
Total 9 year olds UK	688,985	689,000
10 year olds		
England	571,400	571,000
Wales	31,900	32,000
NI	21,939	22,000
Scotland	52,644	53,000
Total 10 year olds UK	677,883	678,000
11 year olds		
England	586,200	586,000
Wales	33,300	33,000
NI	22,166	22,000
Scotland	54,785	55,000
Total 11 year olds UK	696,451	696,000
12 year olds UK		
England	601,900	602,000
Wales	34,200	34,000
NI	23,057	23,000
Scotland	56,171	56,000
Total 12 year olds UK	715,328	715,000

	Number	Source
Total 9 and 10 year olds in the UK	1,367,000	Govt population Stats
96% have access to the internet	1,312,320	Ofcom (2013) <i>Children and Parents: Media Use and Attitudes Report</i> . London: Ofcom
28% have an SNS profile	367,000	EU Kids Online, UK report, pp. 21
Total 11 year olds in the UK	696,000	Govt population Stats
96% have access to the internet	668,160	Ofcom (2013) <i>Children and Parents: Media Use and Attitudes Report</i> . London: Ofcom
59% have an SNS profile	394,000	EU Kids Online, UK report, pp. 21
Total 12 year olds in the UK	715,000	Govt population Stats
99% have access to the internet	707,850	Ofcom (2013) <i>Children and Parents: Media Use and Attitudes Report</i> . London: Ofcom
59% have an SNS profile	418,000	EU Kids Online, UK report, pp. 21
Total 11 and 12 year olds in the UK who have an SNS profile	812,000	
82% of 11 and 12 year olds in the UK who have a profile on a social networking site, have at least one profile on a site which has a minimum age of at least 13	666,000	NSPCC 2012 survey

According to Ofcom 96 per cent of all 8 to 11 year olds and 99 per cent of all 12 to 15 year olds have access to the internet³³. The EU Kids Online study found that 59 per cent of 11 and 12 year olds who use the internet have a profile on a social networking site³⁴. New NSPCC research found that 82 per cent of 11 and 12 year olds who have a profile on a social networking site have at least one profile on a site which has a minimum age of at least 13. These percentages have been applied to the total number of 11 and 12 year olds in the UK and suggest that about 666,000 of them (almost half of the total) have a profile on a site which has a minimum age of at least 13.

33 Ofcom (2013) *Children and Parents: Media Use and Attitudes Report*. London: Ofcom.

34 Livingstone, S., Haddon, L., Görzig, A. & Ólafsson, K. (2010) *Risks and safety for children on the internet: the UK report*. LSE, London: EU Kids Online. Available at: <http://eprints.lse.ac.uk/33730/>

Appendix 3: Quotations

Quotations in this report have been sourced from one of:

- The NSPCC's online survey of 1024 children, conducted in December 2012.
- ChildLine Snapshots: these are created from real ChildLine contacts but are not necessarily direct quotes from the young person.
- Pupils at Chadwell Health Academy in Essex – our thanks to those who took part in the focus groups there.

All potentially identifying details have been changed to protect the identity of the child or young person.



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