June 2019

Girlguiding response to the Online Harms white paper

Girlguiding
Girlguiding is the leading charity for girls and young women in the UK, with over 500,000 members. Thanks to the dedication and support of 100,000 amazing volunteers, we are active in every part of the UK, giving girls and young women a space where they can be themselves, have fun, build brilliant friendships, gain valuable life skills and make a positive difference to their lives and their communities. We build girls' confidence and raise their aspirations. We give them the chance to discover their full potential and encourage them to be a powerful force for good. We give them a space to have fun. We run Rainbows (5-7 years), Brownies (7–10 years), Guides (10–14 years) and Rangers/ The Senior Section (14-25 years). Registered Charity No. 306016. www.girlguiding.org.uk

Our research
Our submission focuses on evidence from our annual Girls' Attitudes Survey – the largest UK survey of girls and young women – which gathers the views and opinions of over 1,900 girls and young women aged 7 to 21, from inside and outside guiding.

Future Girl consultation with young people
This response also draws on our 2018 Future Girl consultation with 76,000 of our members from age 4 to 18, which identified the key changes girls and young women in Girlguiding want to see – including online.

Our Advocate youth panel
Our response also includes quotes from our Advocate youth panel. Our Advocates are a group of 18 Girlguiding members aged 14 to 25 who lead the direction of Girlguiding's advocacy and research.

Small sample of young people
Our submission also quotes from a small sample of ten Girlguiding young members aged 14 to 21 who we took a poll with for our response to the 2017 Internet Safety Strategy consultation. We based this engagement on the questions in the consultation, but used more accessible language suitable for young people to understand and respond to. This survey is included as an appendix at the end of this document.

Summary of our recommendations

- We support the recommendations made by the End Violence Against Women coalition (EVAW) – particularly those relating to violence against women and girls (VAWG) needing to be recognised and included within the strategy, the need for the emphasis to be on challenging perpetrators rather than all users having to 'stay safe' and the need to 'future proof' the strategy to keep pace with the changing picture online.
- Policies, procedures and reporting mechanisms must be clear and accessible to children and young people.
- The action taken to address reported harms should also be clear and available to the public.

- The regulator should have the power to hold companies to account against the new laws.
- The Strategy should take into account other important work such as that of the UN Convention on the Rights of the Child, the consultation on the digital rights of the child and the UK cross-governmental VAWG strategy. It should also complement, take into account and inform Relationships and Sex Education and Health Education lessons that teach children and young people about safety online.
- The regulator must take the specific gendered harms facing girls and young women into account – as well as all protected characteristics under the Equality Act to understand and tackle the specific pressures facing these groups.
- As well as social media sites, the regulator should consider and monitor other online spaces where girls and women receive abuse and harassment – such as in gaming.
- The duty of care should include:
  - Making it easier to report concerns and remove distressing content
  - Protections for children under the lower age limits of platforms (to take into account that many younger children are accessing these)
  - Transparency about what reports they get, who reported them, what the outcomes were and what they're doing to tackle the issues.
  - A responsibility to tackle body image pressures and other specific, gendered pressures facing girls and young women and a celebration of diverse types of women online
  - Proper recognition across the issues of bullying, harassment, sexism and gender norms.
- Online sites should indicate that images on their platforms are likely to be altered
- We'd like to see evidence of an understanding across media (including online) of the ways in which the representation of gender stereotypes can directly harm and limit children's views of themselves and their choices.
- Sites need to respond quickly and effectively to reports of adult content on their platforms (as this won't be covered by age-verification)
- Regulators should be up to date with how children and young people use the internet and their interaction with different sites to help them determine the highest risk content
- Arrangements to ensure the strategy works on a global basis should be clearly outlined
- Girls and young women should be involved and consulted in designing safe products

Question 1 - This government has committed to annual transparency reporting. Beyond the measures set out in this White Paper, should the government do more to build a culture of transparency, trust and accountability across industry and, if so, what?

We welcome the Online Harms White Paper and the government's commitment to keeping girls and young women – and all users – safe online and agree that the online world needs to be as safe as the offline one. As we'll discuss within our response, we're also pleased to see the government's recent announcement that it will be reviewing the law around non-consensual taking, making and sharing of sexual images and believe this will fit well with

addressing some of the harms covered by this strategy. However, we're concerned about further delays to age-verification for online pornography, which we believe will also help to address online harms around children and young people being exposed to harmful sexualised content and hope this can be resolved and rolled out earlier than (or at least within) the six months that has been indicated.

As the leading UK organisation for girls and young women, we're well placed to respond to this consultation, as this is a group that experiences particular gendered harms and pressures online. We capture girls' and young women's views about their experiences online through our annual Girls' Attitudes Survey and other research, which we refer to throughout this response. As we'll show, online safety is a key issue for girls and young women and one they want to see the government take action on to help them stay safe and enjoy the benefits of being online freely and without fear.

We agree with the End Violence Against Women (EVAW) coalition (of which we are a proud member) that the new law and policy being considered by the government is 'a critical area where abuse of women and girls is very real, is increasing and needs specific naming and commitments'. We further agree with EVAW's point that proposals to tackle online harms need to focus on challenging the behaviour and attitudes of people perpetrating these harms rather than simply telling individuals how to stay safe online. We support the recommendations with EVAW's response to this consultation and would particularly highlight their call for detailed recognition and inclusion of violence against women and girls in all its online forms within the strategy to tackle online harms as well as the need to put the burden of tackling harms on platforms not individuals and the need to 'future-proof' the strategy so it has a better chance of keeping up with the rapid pace of change online.

To further build a culture of transparency, trust and accountability across and in industry, it's important that policies, procedures and reporting mechanisms are accessible to young people, so they are clear on what platforms will do to keep them safe and what they and adults supporting them can do when things go wrong (e.g. they experience online bullying, abuse or harassment). This should be enabled by an independent regulator that has the power to hold companies to account. It should also be clear how reported incidents are dealt with. Where sexist harassment and abuse are reported, the figures and steps taken to address this should be publicly available.

It's positive that the White Paper refers to other relevant work on this subject, such as research and publications from Ofcom, the ONS and our own Girls' Attitudes Survey. However, it should also reference the UN Convention on the Rights of the Child and related UN publications on children's safety in the digital world. It should also make direct reference to and draw on the cross-governmental strategy on violence against women and girls (VAWG).

Experiences online

To build a culture of trust and accountability, the government, regulators and platforms need to understand the particular gendered harms facing girls and young women online.

June 2019

Our 2018 Girls' Attitudes Survey showed what girls and young women aged 11-21 have experienced:

- 47% had unkind things said about them on social media compared to 40% in 2013
- 29% often see or experience sexism on social media compared to 25% in 2014
- 25% had threatening things said about them on social media compared to 21% in 2013
- 24% have been sent upsetting photos or content by people they know compared to 17% in 2013
- 8% had photos of a sexual nature sent to other people at school/college/uni/work compared to 5% in 2013 (13+)
- 24% had sexist comments made about them compared to 22% in 2013 (13+)
- 22% had embarrassing photos of them sent to other people at school/college/university/work compared to 2013

50% of girls aged 7-10 were worried about online bullying (2017)

Our 2018 Future Girl consultation showed that 9,706 Guides said bullying (including online) was one of the most unfair things about being a girl. Some Brownies also said they experienced bullying online - 23,158 Brownies (64%) chose bullying as the most important issue for the future.

Girls from our youth panels told us about some of their worries about being online:

> *"Girls can face groomers online who make fake accounts to try and lure them into sending inappropriate photos or to meet them. I think social media sites are responsible for stopping this. They could do this by adding a symbol on someone's profile when they have been verified to show they are who they say. Then, if an unverified account contacts a girl, she would be aware that it has the potential to be a fake account, and to be wary of a potential groomer."* (Laura, Advocate, 16)

> *"I think dating sites make little or no attempt to verify the age of the people using them, so they cannot be considered to be doing their utmost to protect children."* (Girl aged 14 to 21).

> *"I worry about being exposed to "fake news" as I don't want my generation growing up with misinformation about current events happening and without full knowledge of what's going on the world. I think fake news can be particularly damaging to younger children who cannot distinguish as easily between fiction and reality. I think social media sites need to be better at the removal of fake news as this can harm particular groups in society, and lead to prejudice and discrimination against them."* (Izzy, Advocate, 15)

We also know that online gaming is a platform where girls and young women experience harassment and abuse so this should be an area that is also carefully monitored and which has clear and accessible reporting mechanisms that are followed up effectively (as

opposed to this being limited to social media sites). The abuse and harassment experienced by high-profile women gamers reveals the sinister undertones of sexism and misogyny that are present in this area.

Question 2 - Should designated bodies be able to bring 'super complaints' to the regulator in specific and clearly evidenced circumstances?

It would be helpful to have more clarity about what 'super complaints' would look like and how they would be treated differently from standard complaints made by individuals. However, where 'super complaints' refers to a designated body representing collective complainants we believe that this should definitely be permitted, as currently individuals do not benefit from this kind of advocacy on their behalves. We would be interested to hear more about how 'designated bodies' might be defined and believe strongly that charities should be included in that list.

We believe reporting mechanisms for a new independent regulator should be accessible and clearly communicated to groups including children and young people.

Question 3 - What, if any, other measures should the government consider for users who wish to raise concerns about specific pieces of harmful content or activity, and/or breaches of the duty of care?

Platforms' duty of care to their users should include making it easier to report concerns and acting on these in a way that is clearly and accessibly laid out in policies so that users are clear about their rights. It's important that these policies are accessible to children and young people and that it is clear what they are signing up for and what it means. Due to widespread under-age use of sites, platforms should also consider how they protect and support younger children to complain and ensure that all children and young people's complaints are taken seriously. It's not acceptable to only provide protections and support for the ages that are supposed to be accessing the site when we know that the reality is that a much wider range of children are accessing platforms. Sites should be transparent about what reports they get, who reported them, what the outcomes were and what they're doing to tackle the issues. The duty of care should also include platforms' responsibilities around body image to help tackle the specific gendered pressures in this area that face girls and young women.

Girls' and young women's concerns about being online
Our 2017 Girls' Attitudes Survey showed what girls and young women think:

For girls aged 7-10:
- 64% are worried about threats from strangers online
- 61% are worried about people pretending to be someone else online
- 53% are worried about seeing rude pictures online
- 50% are worried about being bullied online
- 40% are worried about how their pictures might be used online

For girls aged 11-16:
- 43% are worried about threats from strangers online

- 45% are worried about grooming online
- 36% are worried about being bullied online
- 34% are worried how their pictures might be used online

For girls aged 17-21:
- 26% are worried about threats from strangers online
- 37% are worried how their pictures might be used online
- 32% are worried about sexual harassment online

Reporting concerns
Despite girls' concerns about being online, our 2018 Girls' Attitudes Survey shows that many girls don't report concerns. This needs to be made easier and more accessible to encourage them to do so.

How girls respond to offensive online behaviour
Girls aged 7-10 (2018):
- 79% tell their parents compared to 69% in 2013
- 33% delete the post or hide the person being rude compared to 27% in 2013
- 32% report it to the social media site compared to 19% in 2013
- 28% tell their friends, sibling or cousin compared to 22% in 2013
- 20% just ignore it compared to 24% in 2013

Girls and young women aged 11-21 (2018):
- 35% tell their parents compared to 22% in 2013
- 46% delete the post/hide the person being rude compared to 57% in 2013
- 46% report it to the social media site compared to 23% in 2013
- 35% tell their friends, sibling or cousin compared to 29% in 2013
- 25% just ignore it compared to 39% in 2013

"I don't think girls feel comfortable reporting abuse, as they may not even recognise it as being abuse in the first place. I think every comment or message with a potentially harmful word in should be flagged, alerting the girl that it has the potential to be abusive. Then, if the girl recognises that the comment is abusive, she can easily report it." (Laura, Advocate, 16)

"I think it's incredibly rare for girls to report abuse and harassment, likely because they fear judgement or being told that 'it happens'. This leads girls to feel as though their harassment is not worth anyone's time, but this needs to end. Spreading awareness of harassment and educating people to know that it should be reported would be a big step forward for reporting abuse to be more supported." (Imogen, Advocate, 15)

Girls from the small sample of young members we polled to inform our response to the 2017 Internet Safety Strategy consultation gave us their views on reporting concerns:

> *"I think social media sites are reluctant to take responsibility for content. They're constantly quoted in the media as emphasising that they're platforms not publishers, and this doesn't give me confidence that they'd respond to concerns. To be honest, I'm not even sure how I'd contact them." (Girlguiding young member aged 14 to 21).*

> *"Although companies always say that they take concerns seriously, too often it's just for show and comments aren't taken down." (Girlguiding young member aged 14 to 21)*

Girls and young women responding to our 2017 Girls' Attitudes Survey told us what would make them feel safer online:

"If you could block bullies and people you don't know." (Girl aged 7-10)

"More serious punishments for bullying." (Girl aged 11-16)

"Social platforms taking more time to delete and remove bad people and their accounts." (Young women aged 17-21)

Online harms

We would recommend that platforms make it clear that images on the platform are likely to be altered (without labelling individual images, as this could be stigmatising to or add pressure onto individual young people, many of whom alter their own pictures) and offering signposting to support for body image concerns and potentially other areas, such as eating disorders. Our 2017 Girls' Attitudes Survey showed that:

- 88% of girls aged 11 to 21 said the advertising industry should make sure all adverts that have been airbrushed are marked to say they have been altered
- 52% have seen airbrushed imaged in the media that made them feel pressured to look different

Platforms should also avoid mechanisms to keep young people online for longer as this adds additional pressures on them.

We welcome the various areas included in the section on 'harms' and would emphasise the importance of there being proper reporting across the issues of bullying, harassment, sexism and gender norms. We would also raise gender stereotypes as a harm that needs to be considered in terms of its impact on restricting the roles children and young people feel they can play, now and in their futures, as well the sexual objectification of women. That's why we were pleased when the Advertising Standards Authority introduced new rules for adverts in June of this year (20129) to ban ads that use harmful gender stereotypes. But we would like to see this approach go further across the media so that there is an understanding of the ways in which the representation of gender stereotypes can directly harm and limit children's views of themselves and their choices.

Social media and advertising

June 2019

Our 2017 Girls' Attitudes Survey showed that girls and young women are aware of and affected by sexism and stereotypes in advertising, including online. Tackling this should also be part of the duty of care:

- 44% have seen statements about women or girls that they thought were sexist on the news or social media
- 47% have seen stereotypical images of men and women in the past week that made them feel less confident to do what they want
- 85% of girls aged 11 to 21 said the advertising industry should not advertise toys using gender stereotypes
- 51% of girls aged 11 to 21 said adverts that are marketed at boys or girls are harmful to women being treated fairly and having equal opportunities to men

Harmful sexualised imagery and pornography

Girls and young women told us about the harmful impacts they feel pornography has on society and how they are treated. We were delighted when the 2017 Digital Economy Act brought in age verification for online pornography (although it's frustrating to hear last week that this has been delayed). However, this ruling won't cover the adult content often shared on social media and removing and restricting this should also be part of companies' duty of care. Platforms need to respond effectively and quickly to reports of such content and also proactively search for content that needs to be taken down. There also needs to be engagement across government departments on this issue.

- 75% of girls aged 11-21 think online pornography encourages society to view women as sex objects (2018 survey)
- 69% of girls aged 17-21 said online pornography sends out confusing messages about consent (2018 survey)
- 8% of girls aged 13-21 had photos of a sexual nature sent to other people at school / college / university / work compared to 5% in 2013 (2018 survey)
- 35% of girls aged 11 to 16 are worried about seeing unwanted pornography online (2017 Survey)
- 48% of girls aged 11 to 16, and 62% aged 17 to 21 have come across unwanted violent and/or graphic images or videos online that made them feel upset or disturbed (2017 Survey)
- 75% of girls aged 13 to 21 agreed that pornographic sites should have age-verification controls (2016 Survey)
- 70% of girls aged 13 to 21 think the rise in online pornography contributes to women being treated less fairly (2015 survey)
- 80% of girls aged 17 to 21 think the rise in online pornography encourages society to view women as sex objects (2015 Survey)
- 66% aged 17 to 21 think pornography puts pressure on girls to have sex before they are ready (2015 Survey)

In addition, as discussed, we were pleased to see the government's announcement that it will review and make laws and policy on dealing with the taking and sharing of non-consensual sexual images fit for purpose to protect people who may experience this.

June 2019

Appearance pressures in the media

The duty of care should also include tackling the appearance pressures that girls and young women face online so that users can report pressures like inappropriate adverts for fad diets and/or use of celebrities to promote these.

To set these pressures in context, our 2018 Girls' Attitudes Survey showed that 30% of girls and young women aged 11-21 are not happy with how they look. Our 2016 Survey showed that 47% thought that they way they look holds them back in life. In terms of girls' online lives, our **2018 Girls' Attitudes Survey** shows:

- 80% of girls aged 11-21 think there's too much discussion about women's body shape in the media
- 22% said they've tried a diet after hearing about a celebrity using it
- 53% said bloggers and YouTubers create the idea of being perfect that is unrealistic and unachievable
- 52% said they sometimes feel ashamed of the way they look because they're not like the girls and women in the media
- 59% think one of the main causes of stress among girls is the pressure from social media
- 44% think that one of the main causes of stress among girls is the pressure to look like a celebrity

"There are a number of issues that girls face online. One is body image. When girls go online and, say, go internet-shopping for clothes or make-up, they will immediately be confronted with models who seem to have "perfect" bodies. Almost all will be white, and very thin. This can lead to girls who don't have bodies like this feeling less comfortable with their bodies. At the same time, the internet is full of articles and ads promoting "fad diets", low-calorie diets or food substitutes, frequently promoted using images of very slim people. This can perpetuate the dangerous idea that calories are always "bad", and diets, even those that involve missing out on key nutrients, "good". Advertisers should take responsibility for the messages they're sending out online and choose a diverse group of models with a range of body shapes to promote products. I believe the government must take action. For example, it could require that warnings about possible nutritional deficits arising from using them be put on dieting products, and ban the use of models below a minimum healthy BMI, as France has done." (Juliet, Advocate, 17)

Representation in the media including online

Our 2018 survey also showed where girls and young women would like to see more representation of women, including online and we would like to see social media sites promoting and celebrating a range of girls and women from different groups across their platforms. This should also be taken into account within the duty of care.

- 38% of girls and young women aged 11-21 said they'd like to see more representation of women in the media (e.g. online)
- 47% of girls aged 11-21 said sexualised pictures of women online lead girls and women to be treated less fairly than men

- 67% girls aged 7-10 said that naked pictures of women in the media affects the way people treat girls and women
- 52% aged 13-21 have heard about the recent sexist abuse of women on social media channels and 25% said this makes them scared that they could also receive this abuse just for being a girl / young woman

Distressing content

In addition, our Future Girl consultation shows that girls care passionately about protecting animals and so seeing videos of animals being harmed would be very distressing to them. The impact of such content on children and young people needs to be taken into account so that it is appropriately restricted and can be reported and removed easily – particularly as it is likely to be illegal content that needs to be removed for that reason.

Question 4 - What role should Parliament play in scrutinising the work of the regulator, including the development of codes of practice?

We believe Parliament should champion users' rights and particularly protect and promote children's rights in the digital environment by holding platforms to account. The regulator needs to have the resources and power to do its job so it's useful if Parliament can support and enable this. For example, Parliament should make sure that the regulator and codes of practice reflect any developments in the UN Council on the Rights of the Child and related work on children's digital rights. For example, we contributed to the UNCRC consultation on children's rights in the digital environment. Here are our key recommendations:

1. Businesses operating in the digital environment should have to follow minimum standards and must consider the best interests of the child.
2. Young people should receive high-quality education on how to stay safe online
3. Parents and other caregivers should also receive education about online safety so that they fee equipped to keep their children safe online and understand the risks of sharing photos and information about their children.
4. The voices of girls and young women - and all young people – must be included in discussions and decisions on this issue, through direct participation and taking advice from experts in children and young people. This includes finding a way for the voices of children under 18 to be heard in relation to the 'right to forget'.
5. Terms and conditions should be clear and easy to understand so that young people know how to report harassment and abuse. A good example of this is from the Children's Commissioner for England's[1]. However, the barriers that stop girls and young women from reporting issues such as the normalisation of sexism and abusive behaviour or the fear of being bullied for speaking out, should also be tackled
6. Social media sites should be responsible for removing adult content from their platforms

---

[1] https://www.childrenscommissioner.gov.uk/2017/09/29/childrens-commissioner-launches-social-media-giants-terms-and-conditions-jargon-buster-to-give-kids-more-power-in-digital-world/

June 2019

7. Other documents should be considered - such as the VAWG Strategy[2], the Age-appropriate design[3], and the Online harms white paper[4] in the UK. We also recommend considering issues of online harassment and abuse alongside other online pressures, such as the pressure to live the perfect life online, body image anxiety and sexual harassment.

It's vital that girls and young women are able to access online spaces without fear of abuse and harassment so that they can enjoy the many advantages of being online.

Our 2018 Girls' Attitudes Survey showed that girls use social media to speak out on issues they view as important:

- 22% of girls and young women aged 11-21 have spoken up by posting online
- 18% of girls aged 11-21 have spoken up by supporting a Facebook or Twitter campaign

Question 5 - Are proposals for the online platforms and services in scope of the regulatory framework a suitable basis for an effective and proportionate approach?

We're concerned about the timescales involved in the overall strategy of tackling online harms as it is a rapidly changing picture and difficult to keep up with as online platforms and the ways in which young people and others use them constantly evolve. On the level of individual complaints and reports, we're also concerned about the time it can take platforms to respond – e.g. taking down abusive comments or offensive images – as children and young people could already have been badly affected before the issues are addressed. For this reason, we believe it's vital that platforms are expected to improve their processes of addressing complaints and reports so that this happens faster and users have more confidence. Reporting on how these complaints are addressed should be used to update and develop policies to tackle issues more strategically and effectively. As discussed, we support EVAW's recommendation that the strategy be future proofed to help keep up with the changing picture. Also, where the document says that Ofcom will be responsible for this area until the Online Harms Strategy is in place, it's important that Ofcom is properly resourced to hold this massive and complex area for as long as it is expected to.

> *"I feel as if social media companies act on things eventually, but not quickly enough – so the damage has already been done by that point."*

As discussed later in this document, prevention is preferable to dealing with harms after the fact and so it's vital that regulation complements and takes into account digital

---

[2]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783596/VAWG_Strategy_Refresh_Web_Accessible.pdf
[3] https://ico.org.uk/media/about-the-ico/consultations/2614762/age-appropriate-design-code-for-public-consultation.pdf
[4]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793360/Online_Harms_White_Paper.pdf

education being received by children and young people through Relationships and Sex Education and Health Education.

In addition, where the document talks about determining and prioritising the highest risk content in taking things down, it would be useful to understand how this will be determined. For example, regulators should need to be up to date on which platforms children and young people are currently using most and in what ways, so that this informs how they determine risk. It would also be helpful to understand what will happen to content judged to be of a less high risk while higher priority content is being dealt with and how long users can expect it to take to remove and address content and concerns.

Question 7 - Which channels or forums that can be considered private should be in scope of the regulatory framework?

It's important that users can report abusive or offensive content sent to them on private channels such as WhatsApp or Facebook Messenger. This could be achieved by users clearly understanding that they can screenshot and report abuse and that this would result in action being taken – this could include sites reporting this to the police where appropriate or actioning the complaint through the same processes they would on public sites (although probably adapted to fit private platforms – e.g. banning or issuing warnings to individuals would work but removing content would be harder on private channels) once evidence of abuse or harassment has been passed to them by individuals. Although sites wouldn't be able to search for inappropriate content proactively on private channels (as we'd expect them to do on public ones) we want to see them respond proactively to reports of abuse from users and for the system to do this to be clear so that individuals just have one place to pass their concerns to and the platform itself deals with assigning the next steps and who should be responsible for addressing it.

Question 8 - What further steps could be taken to ensure the regulator will act in a targeted and proportionate manner?

It would be useful if the research that the document mentions is taking place to implement the Online Harms Strategy could take into account the impact of online harms on specific groups – such as girls and young women, young people more generally, people from different ethnic backgrounds or with different needs or disabilities or with different sexual orientations – and the specific harms they face and identify targeted ways to address these. Therefore, the regulator should consider its role in relation to the Equalities Act and protected characteristics. Part of this will be following EVAW's recommendation that a detailed recognition of violence against women and girls be included in the strategy so that there is understanding of how unacceptable sexist and abusive behaviours can arise in efforts to tackle online harms.

It would also be vital to consider the experiences of different groups and how they use platforms in determining which content is of the highest risk (as discussed previously).

Question 9 - What, if any, advice or support could the regulator provide to businesses, particularly start-ups and SMEs, comply with the regulatory framework?

It's positive that smaller companies will be given resources to build capacity to carry out their responsibilities under the Online Harms Strategy as all need to be involved – not just

those companies rich or big enough to be able to afford to be. It's likely that different sized companies will need different types and levels of support to ensure they are meeting these responsibilities properly.

Question 10 - Should an online harms regulator be: (i) a new public body, or (ii) an existing public body?

We don't have evidence to directly answer this question but would emphasise the importance of whatever arrangements are chosen taking young people and their needs into account in regulating online spaces and harms. As discussed, it's also vital that the regulator has the resources and power it needs to hold online companies to account against the new legislation.

Question 12 - Should the regulator be empowered to i) disrupt business activities, or ii) undertake ISP blocking, or iii) implement a regime for senior management liability? What, if any, further powers should be available to the regulator?

Although we don't have evidence to comment on the specific options here, we wanted to emphasise the importance of the regulator implementing meaningful change with measures that actually deter platforms from not meeting their responsibilities to keep users safe.

> *"I have reported concerns before. I asked for a post to be taken off Facebook but was told it wasn't inappropriate. I disagreed. I have no confidence that enough is being done to stop harmful posts or content."* (Girlguiding Advocate, aged 14-25)

> *"A lot of the time social media can be lazy when responding to concerns. This is evidenced through countless occasions where I have come across racist, misogynistic and offensive attacks where the perpetrator's comments were not a one-time thing. I think social media doesn't take these hate remarks as seriously as they should, as I know of people that have reported others and the most that was done was that the account was temporarily suspended, but not permanently, and further checks were not undertaken."* (Girlguiding Advocate, aged 14-25)

Question 13 - Should the regulator have the power to require a company based outside the UK and EEA to appoint a nominated representative in the UK or EEA in certain circumstances?

Although we don't have evidence to comment on specific arrangements to achieve it, it's vital that the Online Safety Strategy works on a global basis, as the internet has no national boundaries and it would be impossible to keep users safe without addressing harms wherever they are found. It's positive that the strategy recognises the importance of this global aspect, but it would be helpful to understand what will be done to ensure it will work.

Question 15 - What are the greatest opportunities and barriers for (i)innovation and (ii) adoption of safety technologies by UK organisations, and what role should government play in addressing these?

As discussed, we're concerned that the rapidly changing picture online will act as a barrier to effectively using the strategy to tackle online harms. Therefore, the government must take this changing picture into account as well as keeping up to date on how people –

particularly young people – use the internet and different platforms to try and stay on top of the situation and appropriately address abuse and concerns.

Question 16 - What, if any, are the most significant areas in which organisations need practical guidance to build products that are safe by design?

Ensuring arrangements take into account the specific needs and experiences of people from different groups. For example, the age-appropriate design code has many effective examples of ensuring online spaces are both safe and accessible for young people and should be considered in making these arrangements. Girlguiding also contributed to the consultation on the age-appropriate design code.

Consulting with girls and young women to understand and reflect the specific, gendered pressures they experience.

Question 17 - Should the government be doing more to help people manage their own and their children's online safety and, if so, what?

We believe there needs to be a balance between education on critical engagement with the internet for children, young people and their families and responsibilities for companies. As discussed, we agree with EVAW that the emphasis of the strategy should be on preventing people from perpetrating harms rather than only on encouraging users to stay safe. While it's vital that online users are equipped to deal with the online harms they may come across, this should not in any way replace the need for government, regulators and platforms to effectively address them and we welcome the news that fines will be given to companies that don't meet their responsibilities in tackling perpetrators abusive content and behaviours.

With this in mind, topics like critical engagement with online media and content and offering support and signposting for when people experience abuse and harassment will be useful parts of the Relationships and Sex Education (RSE) and Health Education curriculums. It's also important that parents are supported to help their children stay safe online and not inadvertently place them at greater risk of harm, embarrassment or discomfort through a lack of knowledge – for example through sharing images of them widely without their permission ('sharenting').

In our 2017 Girls' Attitudes Survey, 34% of girls aged 7-10 said their parents had asked for their consent before posting pictures of them online. 21% of those said this made them feel embarrassed.

> *"I think parents need to show their children how to make their social media accounts private, as this would prevent a lot of issues arising. [Parents] should ask children when sharing photos of them online because children are entitled to privacy. A photo being posted without permission could make the child uncomfortable and carries the risk of these getting into the wrong hands, especially if photos include personal information e.g. school name affecting children's safety." (Laura, Advocate, 16)*

> *"I think parents should know what social media their child uses to make sure they are comfortable with the sites. However, teenagers should be given the freedom*

to use social media, as it comes with many benefits such as keeping in contact or sharing memories. Raising awareness about risks is important for both parents and children to understand how to stay safe online." (Imogen, Advocate, 15)

"It's important that parents are aware of dangers and know ways to prevent their children from risk online, through parental security and blocking certain types of pages." (Girl, aged 14 to 21)

"Parents should be taught how to set child locks and restrictions, as lack of knowledge can lead to children seeing inappropriate content. Parents sharing photos of children can certainly be frustrating, from the child's point of view. Too often, parents see it as a compliment when really it can be embarrassing, and at the more severe end, put the child in danger of being featured in ads or even porn sites. Posting photos is seen as so harmless. If a campaign could be launched that could make parents see that no photo is an exception to the rule, that permission should be sought, this might be effective." (Juliet, Advocate, 17)

Education for parents about how children use and interact with the online world could also help more understand the particular challenges and concerns their children have. Our Girls' Attitudes Survey showed that children and young people's greatest concerns about being online often didn't match those of their parents:

Our 2017 Girls' Attitudes Survey showed what girls aged 7 to 10 think:

- 64% are worried about threats from strangers online (65% thought their parents would be concerned about this)
- 61% are worried about people pretending to be someone else online (61% thought their parents would be concerned about this)
- 53% are worried about seeing rude pictures online (65% thought their parents would be concerned about this)
- 50% are worried about being bullied online (52% thought their parents would be concerned about this)
- 40% are worried about how their pictures might be used online (47% thought their parents would be concerned about this)

For girls aged 11 to 16:
- 43% are worried about threats from strangers online (61% thought this is what their parents were most concerned about)
- 45% are worried about grooming online (65% thought this is what their parents would be most concerned about)
- 36% are worried about being bullied online (51% thought this is what their parents would be most concerned about)
- 34% are worried how their pictures might be used online (only 26% thought this is what their parents would be most concerned about)

For girls aged 17-21:

- 26% are worried about threats from strangers online
- 37% are worried how their pictures might be used online
- 32% are worried about sexual harassment online

In our 2018 Girls' Attitudes Survey, we asked girls and young women what one thing they would change to improve girls' lives:

> *"Increase of real-life images of normal people on social media, without make-up and filters."* (Girl, 11-16)

> *"Educate everyone on how to behave in relationships."* (Girl, 11-16)

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

The regulator should take the education children and young people receive through RSE and Health Education on engaging with the online world into account through their activities and consider ways to complement this through online education. For example, the peer education scheme discussed in the 2017 Internet Safety Strategy consultation (which we also [responded to](#)).

> *"I think peer interaction is one of the best ways to engage young people and make them feel they are being addressed as equals. But I only feel it would be effective if every child knew about it, had access to it and was encouraged by their peers themselves to use it."*

> *"[Having a peer education scheme] could help children recognise internet danger and help them prevent future issues."*

It would also be useful if updates from the regulator informed the content of RSE and Health Education lessons on online topics to help schools stay up to date with teaching children about navigating the changing online world.