

**From:** Common Sense  
**Re:** Online Harms White Paper - Consultation Response  
**Date:** 19th June 2019

Dear Sir/Madam,

We are greatly encouraged by the British government's efforts to address online harms and to hold platforms to account. Thank you for this opportunity to respond to the Online Harms white paper.

Common Sense is an independent nonprofit organisation (based in San Francisco, and launching our first international office in the UK later this year) dedicated to helping kids thrive in a rapidly changing world. Our [research](#) provides parents, educators, health organisations, and policymakers with reliable, independent data on children's use of media and technology and the impact it has on their physical, emotional, social, and intellectual development.

We believe it is critical that governments and companies protect children's privacy; prevent children from experiencing digital manipulation; support independent and longitudinal research; and protect children from inappropriate content on all platforms while ensuring access to positive content.

Common Sense supports the regulatory framework and proposal set out in the white paper, and we will focus our response specifically on two key consultation questions:

- Question 17: Should the government be doing more to help people manage their own and their children's online safety and, if so, what?
- Question 18: What, if any, role should the regulator have in relation to education and awareness activity?

Our research shows that children, parents, and educators want help in managing their and their families' online safety, and the UK government and proposed regulator must intervene to protect and support children online. Many families feel as if they have lost control of their identities and information online, and of their children to screens and videogames. Educators are concerned that children do not know how to critically evaluate the digital world in which they are growing up.

While parents, teachers, and schools are making efforts, these efforts are not enough. They require more support from industry and policy makers. In addition, the burden should not fall squarely on the shoulders of individuals. While we must teach parents, teachers, and kids good digital hygiene practices and privacy skills, we must also ensure that there are baseline protections in place, and that companies do their part. Even extremely savvy digital citizens are powerless if they have no choices or rights. For this reason especially, we appreciate the holistic approach you are considering, ensuring companies remain accountable while also enabling individuals to empower themselves.

**Part 1: Should the government be doing more to help people manage their own and their children's online safety and, if so, what?**

## Families Need Help

This is the first generation of teens to grow up with a mobile device in their hands – and the first generation of parents to face unprecedented challenges in managing digital media in their own lives and in the lives of their children. Media has become such a central part of children’s lives that understanding which media activities children are engaged in, for how long, and in what context is essential knowledge for those who are working to support children’s healthy development.

Common Sense research conducted in the United States is consistent with the [UK Ofcom’s Children and Parents: Media Use and Attitudes Report](#):

- 95% of teens have their own mobile device, giving them nearly unlimited access to tech-driven learning and entertainment.<sup>1</sup>
- 42% of kids age 0–8 have their own phone or tablet.<sup>2</sup>
- On average, kids spend 6–9 hrs per day using entertainment media.<sup>3</sup> (Kids age 8–12 average 6 hours per day, and teens age 13 and up average nearly 9 hours per day—and that's not including screen time for class or homework).<sup>4</sup>
- 81% of teens use social media; 70% of teens use social media multiple times a day.<sup>5</sup>

In 2018, Common Sense Media and the University of Southern California’s Annenberg School for Communication and Journalism embarked upon a global mapping project designed to advance a cross-cultural exploration of family digital media engagement. What we discovered is that the pull of mobile devices is powerful for both adults and teens and is emerging as a new family conflict zone.

Our research in the United Kingdom showed “screen time” ranks as the third-most-prevalent source of conflict for parents, following chores and bedtime. About two thirds of families have rules about mobile device use, such as devices not being allowed at the dinner table. Yet those rules are often broken. Only about 30 percent of families say no one breaks the rules.<sup>6</sup>

Common Sense research in the United Kingdom revealed that nearly half of both parents and teens say they “feel addicted” to their own mobile devices, and many see the other as being “addicted” as well. Asked about time spent on mobile devices, over a quarter of teens (29 percent) feel their parents spend too much time on their devices; sixty-five percent of parents say their teens spend too much time on theirs. A majority of parents and a third of teens acknowledge trying to cut back on the time they spend on their mobile devices.<sup>7</sup>

There is an urge to check devices early and often: in the United Kingdom over a quarter of parents (27 percent) and almost half of teens (48 percent) check their devices within five minutes of

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<sup>1</sup> Pew Research Center, May 2018, “Teens, Social Media & Technology 2018”

<sup>2</sup> The Common Sense census: Media use by kids age zero to eight. San Francisco, CA: Common Sense Media. 2017.

<sup>3</sup> The Common Sense Census. Media Use by Tweens and Teens. San Francisco, CA: 2015.

<sup>4</sup> The Common Sense Census. Media Use by Tweens and Teens. San Francisco, CA: 2015.

<sup>5</sup> Social media, social life: Teens reveal their experiences. San Francisco, CA: Common Sense Media. 2018

<sup>6</sup> Robb, M. B., Bay, W., & Vennegaard, T. (2018). The new normal: Parents, teens, and mobile devices in the United Kingdom. San Francisco, CA: Common Sense.

<sup>7</sup> Robb, M. B., Bay, W., & Vennegaard, T. (2018). The new normal: Parents, teens, and mobile devices in the United Kingdom. San Francisco, CA: Common Sense.

waking up. Another 45 percent of parents and 31 percent of teens check their devices within 30 minutes of waking up. Parents and teens say they feel compelled to check them frequently: Over half (58 percent) of parents and two-thirds (66 percent) of teens report checking their devices at least once an hour. And over half of parents (57 percent) and almost two-thirds of teens (65 percent) “always” or “very often” feel the need to respond immediately to texts, social media messages, or other notifications.<sup>8</sup>

Research has shown that families are concerned with the effects this “always on” digital culture is having on their children, however, it remains unclear exact physical and emotional toll. From distraction to loss of sleep, technology is making a large footprint in the lives of families. 57% of all teens agree that using social media often distracts them when they should be doing homework.<sup>9</sup> There are many households where everyone feels “addicted” to their devices. A majority of children with parents who feel addicted to their mobile device also feel addicted themselves, creating households where the entire family is more likely to feel addicted to their mobile devices. More than half (56%) of teens who have a parent who feels addicted to their device feel addicted themselves.<sup>10</sup>

Doctors and researchers say not to use your phone in the hour before bed but parents and teens do. A majority of parents (61%) check their mobile device within 30 minutes of falling asleep. Similarly, a majority of children (70%) check their mobile device within 30 minutes of falling asleep at night. Many teens and parents are having their sleep interrupted by notifications. One in three teens (36%) wakes up and checks their mobile device for something other than the time at least once a night. One in four parents (26%) does this as well. While parents say they are waking up and checking because they received a notification (51%) and/or couldn't sleep (48%), children say they are waking up and checking because they received a notification (54%) and/or they want to check social media (51%).<sup>11</sup>

Despite reporting concerns about feelings of addiction and distraction, parents and teens in the U.K. express optimism about the benefits of mobile device use. About two-thirds of both teens and parents believe that teens’ mobile device use helps them learn technological skills, and more than half of both parents and teens report that device use helps them develop skills they’ll need in high school or college. While parents and teens express awareness of mobile devices as a source of tension and conflict, most do not believe it harms their relationship. Nearly three-quarters (71 percent) of parents feel their teen’s use of mobile devices has made no difference to their relationship, and 15 percent say it has helped. More than three quarters (83 percent) of teens feel their parents’ use of mobile devices has made no difference to their relationship; another 14 percent say it has helped their relationship. They believe that mobile device use supports family activities such as travel in positive ways.<sup>12</sup>

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<sup>8</sup> Robb, M. B., Bay, W., & Vennegaard, T. (2018). *The new normal: Parents, teens, and mobile devices in the United Kingdom*. San Francisco, CA: Common Sense.

<sup>9</sup> *Social media, social life: Teens reveal their experiences*. San Francisco, CA: Common Sense Media.(2018).

<sup>10</sup> *Screens and Sleep*, San Francisco, CA: Common Sense Media. (To be published May 24, 2019).

<sup>11</sup> *Screens and Sleep*, San Francisco, CA: Common Sense Media. (To be published May 24, 2019).

<sup>12</sup> Robb, M. B., Bay, W., & Vennegaard, T. (2018). *The new normal: Parents, teens, and mobile devices in the United Kingdom*. San Francisco, CA: Common Sense.

As amount of time spent on devices has increased, so have families' concerns regarding online privacy and manipulation. 72% of teens believe that tech companies manipulate users to spend more time on their devices.<sup>13</sup> Very few people think sites do a good job explaining what they do with users' information. Only a third (36 percent) of teenagers agree that social networking sites do a good job explaining what they do with users' data. Parents of teens are much more negative, with almost twice as many (54 percent) saying that social networking sites and apps don't do a good job explaining what they do with users' data as those who say they do a good job (32 percent).<sup>14</sup>

Beyond looking at the amount of time spent on devices, it is also critical to look at the experiences and quality of content children come across. 56% of kids 10 to 18 say they can't tell fake news stories from real ones.<sup>15</sup>

Additionally, more than one in 10 teens (13 percent) say they have "ever" been cyberbullied<sup>16</sup> and a majority of teens (59 percent) have experienced "some sort of cyberbullying."<sup>17</sup> Targets of cyberbullying report feeling depressed, sad, angry, and frustrated. Cyberbullying can also affect self-esteem, contribute to family problems, disrupt academic achievement, lead to school violence, and give rise to suicidal thoughts (Hinduja & Patchin, 2018).

Similarly, more than a quarter of high school teachers report sexting as an issue. Twenty-seven percent of high school teachers reported that sexting occurred in their classrooms at least occasionally, compared to 19 percent of middle school teachers, 5 percent of third- through fifth-grade teachers, and 9 percent of kindergarten through second-grade teachers.<sup>18</sup>

### Solutions for Government To Help Families

The one thing that is crystal clear following research is that families want more help and supports in managing devices and digital life. The Government is in a prime position to offer these supports, and we recommend the following approach:

- Government can help fund more and better research, including longitudinal studies that can take into account variations between kids and look at causation over time. Data on the impact of media and tech on kids can help identify evidence-based harms and opportunities to inform needed changes. Initial research has confirmed what many families have seen in their own lives: digital connectivity is beneficial for learning, creating,

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<sup>13</sup> Social media, social life: Teens reveal their experiences. San Francisco, CA: Common Sense Media.(2018).

<sup>14</sup> Common Sense Media and SurveyMonkey. Privacy Matters:Parents and Teens Share Attitudes and Opinions. 2018.

<sup>15</sup> News and America's kids: How young people perceive and are impacted by the news. San Francisco, CA: Common Sense.(2017)

<sup>16</sup> Social media, social life: Teens reveal their experiences. San Francisco, CA: Common Sense Media.(2018).

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[https://d1e2bohyu2u2w9.cloudfront.net/education/sites/default/files/tlr\\_component/common\\_sense\\_education\\_digital\\_citizenship\\_research\\_background.pdf](https://d1e2bohyu2u2w9.cloudfront.net/education/sites/default/files/tlr_component/common_sense_education_digital_citizenship_research_background.pdf)

<sup>18</sup> Vega, V., & Robb, M. B. (2019). The Common Sense census: Inside the 21st-century classroom. San Francisco, CA: Common Sense Media.

and connecting; at the same time, use of digital devices can leave kids feeling addicted, unhappy, and distracted. But more research is needed, on everything from brain development to the influence of tech on relationships and vulnerable communities. We need far better data, using a range of methodologies, with populations that accurately represent populations at hand. We thank you for committing to further support research including in the areas of children and screens.

- Government must create safeguards to protect kids from exposure to inappropriate content. Legislation enforcing and articulating a strong duty of care would provide users, parents and caregivers with a clear expectation of the platform's responsibilities of providing age appropriate content to content moderation/recommendation, advertising, data retention/privacy, and on-platform purchases. Traditional forms of media in the UK have a long history of incorporating advertising and content rules to create a healthy media ecosystem for kids while preserving a robust marketplace for speech. The best interests and protection of children sit at the heart of the Advertising Codes.
- For government to enforce and improve rules for this fast paced issue, industry must provide regulators with a clear picture of practices. Rules requiring transparency from companies ensure that government, industry, advocates and parents can apply the best practices based on the best information available.

## **Part II: What, if any, role should the regulator have in relation to education and awareness activity?**

### Education is Necessary

Now more than ever, digital citizenship skills are critical to a 21st-century education. Teaching students digital skills is just the beginning. Education and outreach should be provided to families and to children through schools. Schools have the opportunity formalise digital citizenship education for all students. As schools integrate technology for learning, they face challenges protecting kids safety, privacy, and wellbeing. Digital citizenship education is one avenue to help children learn the skills and, crucially, habits of mind to help navigate the digital world.

Common Sense recently conducted research to explore how educators have adapted to these critical shifts in schools and society. From the benefits of teaching lifelong digital citizenship skills to the challenges of preparing students to critically evaluate online information, educators across the United States shared their perspectives on what it's like to teach in today's fast-changing digital world. Teachers' top technology-related concern was that "students lack skills to critically evaluate online information," which 35 percent observed "frequently" or "very frequently" in their classrooms. Relatedly, news and media literacy was the fourth most taught digital citizenship competency. The second top concern was that "technology distracts students from the learning experience and interferes with learning," reported by 26 percent of teachers as "frequent" or "very frequent" in their classrooms. This issue was also reported more often as grade levels increased.<sup>19</sup>

As media and technology continue to evolve, educators and parents are looking for guidance. They need new strategies to engage and empower the next generation of digital citizens. That is why Common Sense developed an award-winning Digital Citizenship Curriculum that supports

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<sup>19</sup> Vega, V., & Robb, M. B. (2019). The Common Sense census: Inside the 21st-century classroom. San Francisco, CA: Common Sense Media.

teachers and prepares students to think critically and use technology responsibly to learn, create, and participate. Now in 50% of schools in the United States, the Common Sense K-12 Digital Citizenship Curriculum takes a whole-community approach by providing education materials and strategies for schools, and has lessons and teaching tools that prepare students to take ownership of their digital lives—in school, at home, and in their communities. Recently, we launched a new module to help children distinguish “fake news” and misinformation online.

Internet safety often requires that families have robust broadband. Mobile applications often have fewer safeguards when compared to the low cost, higher quality safeguards available for computer software and applications. Students with limited broadband access or limited access to digital tools are disadvantaged when their teachers are not able to assign homework that's most relevant to or useful for them. Lack of access to computers and the internet could limit learning, making it more difficult for low income children to keep up or develop the skills that are necessary for academic and professional success. It is even more troubling as children enter high school, where much more of the work requires online access to complete assignments or tasks.

Our experience in the US is that educators believe that digital citizenship programmes are highly effective in preparing students for the online world. 700,000 registered educators use our comprehensive and free Digital Citizenship materials in the US and we think the same approach could work well in the UK.

In the UK, 3,000 schools already use our materials, and in the UK we have 4 million unique visitors to our website every year. In Wales, through our partnership with South West Grid For Learning, the Common Sense Digital Citizenship curriculum has been included as part of the Welsh Government's online safety project.

In addition, we have created many parent-facing advice columns, blogs, FAQs, as well as family media agreements, all freely available on our website, that help support parents in making better informed media choices for their families and learning more about what their children are doing online.

#### Solutions for Government to Support Education

We think that Ofsted could play an important role by including key digital citizenship competencies in their inspection criteria. We also believe that the Department for Education should mandate that digital citizenship learnings be integrated into different subjects to help embed learnings.

There are a variety of ways a regulator can support education. At the most basic level, a regulator can serve as a clearinghouse for educational materials, and help those seeking information find the appropriate tools. When the regulator sets plans around access and deployment, the inclusion of resources for educational materials at the planning stage will help ensure that these tools are made available alongside efforts to provide access to broadband. Department for Education and Ofsted can also help guide schools in developing best practices by highlighting key principles or competencies that students should understand.

For example, in 2016, Washington state, working closely with Common Sense, championed the first comprehensive [digital citizenship and media literacy legislation](#) in the United States. The approach convened a state advisory committee composed of researchers, administrators,

educators, and others to review digital citizenship and media literacy curriculum and policy with the purpose of developing best practices and resources. The legislation then called on the state education agency to develop and distribute a list of digital citizenship and media literacy best practices and recommendations to school administrators.

Schools should be required to teach students about Media Balance and Wellbeing, Privacy & Security, Relationships and Communication, Cyberbullying, Digital Drama and Hate Speech, and although we welcome the introduction of mandatory RSE, including online relationships education, we think that it does not go far enough to prepare children for the digital world they are growing up in.

We welcome the government's plan to develop an online media literacy strategy and look forward to contributing to the consultation. We agree with DCMS and the Children's Commissioner's finding that digital literacy is the 'fourth pillar' of education and that a digital citizenship programme should be mandated for all children.

### **Conclusion**

We reiterate that we are pleased and encouraged by the British government's efforts to address online harms and to hold platforms to account. We believe the above steps are necessary, but not sufficient, in order to create a safer online space for our children.

Companies also have a critical role to play, and efforts to educate and assist consumers should be paired with similar outreach, guidance, and strong requirements for industry to act in the best interest of kids (the proposed "duty of care") and to ensure industry is protecting children and teens' privacy and enabling access to enriching and educational content.

The government should invest in more research and the DfE should mandate a comprehensive Digital Citizenship programme for all Key Stages.