

Barnardo's NI

**Consultation Response to
'Keeping children and young people safe online: an e-Safety Strategy
and Three Year Action Plan for Northern Ireland 2019-2022'**

April 2019

Barnardo's NI is the largest children's charity in Northern Ireland. We work with approximately 10,000 children, young people and families, across more than 50 different services and programmes, and in over 200 schools. We provide a wide range of services, from providing early intervention services to working directly with children and young people in need of support. We believe that every child deserves the best possible start in life, and our service provision reflects that philosophy.

Barnardo's NI welcomes the opportunity to comment on the e-Safety Strategy and Three Year Action Plan. Our comments are informed by our experiences of supporting children, young people and families. Amongst our priority areas for service delivery and policy development are young people's mental health and wellbeing, children in and leaving care, and children affected by sexual abuse: we therefore welcome that each of these is reflected in the draft e-Safety Strategy as groups for particular consideration.

In preparing our response to this draft Strategy, we facilitated a consultation session with one of our services, the Disabled Children and Young People's Participation Project (DCYPPP). DCYPPP is based in Armagh and aims to give children and young people aged 8-25 years, who have a long-term disability or condition, the opportunity to have a say on issues that impact on them and their families. These issues are particularly relevant to these young people as they have grown up with the internet and are well aware of the benefits and challenges that face young people online. We have incorporated their views and feedback throughout our consultation response.

We also have a range of other relevant service delivery experiences which we have drawn upon to inform this response. These services include Safe Choices, a specialist child sexual exploitation service, which supports children, young people and families affected by, or at risk of, sexual abuse, and can provide specialist therapeutic support for children who have experienced sexual exploitation. We also have a varied portfolio of mental

and emotional health and wellbeing services, reflecting an ACEs (Adverse Childhood Experiences) -aware approach and trauma-informed practice ethos.

This response highlights some general comments in relation to the draft Strategy, before focussing on several key themes. Our comments are not comprehensive, and we would welcome further engagement as this Strategy enters its next stage of development.

1. General comments

- 1.1. Barnardo's NI welcomes the publication and consultation on the draft e-Safety Strategy. In particular, we welcome the emphasis on facilitating young people's use of the internet in a positive way while staying safe online. Digital technology and the internet are becoming increasingly integrated into our everyday lives; in our 2018 study, *Connections: Parenting Infants in a Digital World*¹, over 97% of participants (parents with infants aged 0-3 years) reported having access to the internet, with 95.4% reporting that they accessed the internet every day at home. It is important to recognise both the positive and negative effects this increased use of digital technology may have, particularly on the lives of young people for whom the internet has always been a staple. This e-Safety Strategy must be the first step to assessing and responding to these changes.
- 1.2. In further developing this Strategy and its associated outcomes, we recommend that children and young people are provided with meaningful opportunities to engage with the Strategy development and contribute their views. In doing so, it is important that measures are taken to ensure a wide range of children are able to engage, including young people who are affected by disability. Whilst we welcomed the opportunity to facilitate an engagement session with one of our services, the Disabled Children and Young People's Participation Project (DCYPPP), to give some young people with a disability the opportunity to provide their views on the draft Strategy, we believe that this could be developed further to reach more young people and adapted to ensure accessibility and more meaningful engagement. For example, ensuring materials are in an accessible format and providing those materials in advance would promote better participation, and it is unfortunate that this was not the case for this particular engagement. Given that children with a disability are noted in the draft Strategy as being particularly vulnerable online, amongst other

¹ *Barnardo's NI (2018) Connections: Parenting Infants in a Digital World:*
<http://www.barnardos.org.uk/connections-parenting-infants-in-a-digital-world.pdf>

groups, we recommend that in developing this draft Strategy further, priority is given to meaningfully engaging with children and young people, and ensuring the voices of the most vulnerable children are reflected in the Strategy.

- 1.3. Barnardo's NI believes it is crucial that the Strategy reflects that the 'online' and 'offline' worlds are absolutely integrated for young people, and those issues that arise online do not stop when they disconnect. For example, previous consultation we carried out with young people in 2017 indicates that experiences such as cyberbullying can affect school attendance and increase anxiety about going to school. In addition, a 2016 survey² of Barnardo's sexual exploitation services across the UK found that 42% of service users were groomed online, with 61% of those groomed online going on to meet the perpetrator and were sexually exploited. These cases demonstrate that online activity can have real world consequences and we believe this should be more clearly reflected in the Strategy.
- 1.4. We are supportive of the Strategy's indication that the internet should be safe for all children, however, the draft Strategy appears to focus more on school-aged children and has only brief references to younger children. Research has shown that the early years are crucial in a child's life for cognitive, social and emotional development, with the attachment developed with caregivers during the 0-3 years particularly important. Recent research by Barnardo's NI, *Connections: Parenting Infants in a Digital World*³, which looked at how parents of infants use technology at home and with their children, indicates that technology has the potential to play a disruptive role during these years if not used thoughtfully. Although this research is referenced in the introduction to the draft Strategy, we would like to see this learning reflected in the principles and actions. We recommend that the needs of younger children are more explicitly referenced within the Strategy and action plan.
- 1.5. Further, this draft Strategy focuses heavily on how to keep children safe online, but we must also recognise the need for adults to be responsible in their use of technology and the internet, both in terms of being mindful of the impact of 'technoference', as well as acting as role models and teachers for younger generations. We therefore also recommend that the Strategy reflects the need to engage and support parents to understand and respond to the evolving aspects of

² <http://www.barnardos.org.uk/barnardos-online-grooming-survey-2016.pdf>

³ Barnardo's NI (2018) *Connections: Parenting Infants in a Digital World*:
<http://www.barnardos.org.uk/connections-parenting-infants-in-a-digital-world.pdf>

parenting in a digital world - from recognising the potential impact of their own use of digital technology on parent-infant bonding, to the need to communicate with older children and understand the risks to their safety and wellbeing that they may encounter online, in recognition that parental engagement and conversation can act as a key early intervention and prevention tool. This will involve exploring effective mechanisms to engage parents on an ongoing basis.

- 1.6. We welcome that the draft Strategy makes some reference to engaging with the voluntary and community sector. However, given the experience of the sector in directly supporting children and young people, and the need for this Strategy to be truly collaborative and joined-up in its implementation, we recommend that the role of the voluntary sector is made more explicit, including in relation to the governance structures.
- 1.7. Finally, Barnardo's NI welcomes the commitment to ensuring the e-Safety Strategy is flexible and responsive to change. We know that the internet and technology evolve rapidly and in order for information and security to be useful and effective, the Strategy needs to be reviewed and updated regularly, at least annually; indeed, through our consultation with DCYPPP, young people indicated that we should aim to refresh our information and learning every six months. This also applies to information that is published in line with Strategy proposals, and any associated training materials.

2. Key themes

Wellbeing

- 2.1. Whilst we welcome that there are some references to mental health throughout the draft Strategy, Barnardo's NI would like to raise our concern that the discussion around wellbeing, and the mental health impact on young people, is largely absent from the draft Strategy. Although the draft Strategy references wellbeing online, it does not form part of the outcomes, or core principles and commitments outlined in the document. The young people in DCYPPP felt strongly that wellbeing online was very important, with the impact of social media being highlighted as a particular concern; one young person shared that he had left all social media platforms recently as he felt that there was a negative culture of young people being constantly attached to their phones and seeking validation online.
- 2.2. Barnardo's NI would strongly recommend that wellbeing is incorporated into the Strategy as a thread that runs throughout all

aspects of e-safety. Bullying and social media are of particular concern for young people, and in order to keep our children and young people safe online, we must prioritise supporting and promoting good mental health and wellbeing in all areas. This means recognising that mental health is wider than mental illness, and that emotional and mental wellbeing is an important part of the broader definition of safety.

Privacy and data protection

- 2.3. One theme that emerged very strongly when consulting with young people involved with DCYPPP was their awareness of the lack of privacy and data protection online. This theme was raised in every area of conversation, ranging from accessing public WiFi where your data may be unsecured, to voice assisted technology which is always actively listening for command prompts. Many of the young people felt that they took the necessary actions to protect their data and privacy, but that ultimately there was no way to be completely secure. All the young people felt that they could access and change their privacy settings on the various social media sites without needing information on how to do so; they described this as an intuitive knowledge that they have from being so familiar with digital technology. However, many felt that their parent's knowledge of this information was lacking and that parents would benefit from a targeted Facebook campaign to educate them on keeping your data and personal information safe online.
- 2.4. Another area where young people felt their personal data was particularly vulnerable was when accessing public WiFi. These networks are very vulnerable to attack, and as a result data shared when using these open networks can be stolen. In addition, public WiFi can be easy to mimic and these false networks can be difficult to distinguish from genuine public WiFi. Barnardo's NI recommends that the e-safety messages should also include information about the risks of public WiFi and the steps that young people can take to verify networks and protect their data online.
- 2.5. As part of the online resources developed through the e-Safety Strategy, young people said it would be useful if information was available on what to do if you realise your privacy or data has been compromised. Although steps can be taken to minimise risks, online attacks and viruses are becoming more sophisticated; it would be helpful if young people had a reliable source, i.e. the central e-safety hub, that could help them take action to protect themselves. This information must be available in an accessible, age-appropriate way for all children, in terms of age, disability and language needs.

Online content restriction

- 2.6. Barnardo's NI notes the intention of EA, in line with the Strategy, to provide internet access through the C2K filtering system in order to empower and educate children online, rather than restriction (p38). While this is well intentioned, the young people in DCYPPP noted that the reality in many schools is that content restrictions are not fit for purpose – young people highlighted that in some cases, current firewalls are so limiting that even some educational site are blocked. The young people in DCYPPP advised that most children in their schools were aware of how to bypass these restrictions to allow access to any website they needed, often times to complete coursework. Our concern is that this draft Strategy, and EA, are reliant on the C2K content restrictions to safeguard children, when young people tell us that this is not always effective.
- 2.7. During our consultation with DCYPPP, the young people voiced concerns about adult material appearing online while they were browsing the internet. A suggested solution was to implement an internet watershed – similar to the watershed rules for TV programming in the UK. Although there would be challenges in implementing any type of content restriction, young people want to be able to access the internet without the risk of inappropriate content popping up on their screens. It is crucial that the internet is a safe place for children and young people by design and does not cause harm to their wellbeing and safety. We urge that in developing further, the Strategy seeks to engage with developments at Westminster in relation to online harm.

Understanding the scale of the problem

- 2.8. Barnardo's NI welcomes the intention to adopt data collection on the scale of e-safety related incidents. We recognise that this data would be a valuable tool in shaping evidence-informed strategies and action plans. However, research into e-safety needs to be much broader than a statistical count of incidents – particularly as many incidents will not be formally reported and recorded, or are seen as too 'everyday' to be raised despite having a harmful impact on a child or young person. It is important to engage with children and young people to understand the nature and impact of social media and other aspects of the digital world on young people's daily lives, including their mental health and wellbeing. We cannot effectively assess and address the challenge of promoting and supporting wellbeing and safety online if we do not understand the nature of the problem.

Industry regulation

- 2.9. Barnardo's NI is broadly supportive of the charter mark scheme proposed in the Strategy, however there should be clarity on how this scheme will be implemented, including how often companies will need to re-apply to ensure their provision is up to date. In order for the charter mark scheme to be effective, there should be clear repercussions on companies that do not provide a service to the level guaranteed by the charter mark. Furthermore, the young people in DCYPPP were concerned that many of these companies will have access to sensitive data due to the nature of their work; it is important that clear reporting and whistleblowing processes are made publically available.
- 2.10. Finally, tech companies have a clear role to play in ensuring children's safety online. We welcome the draft Strategy's commitment to working with the major internet providers on safer internet policy; however, this engagement with the industry must be broadened to include major tech companies, e.g. Facebook, Twitter and other platforms as they emerge. We urge that the Strategy engages with current developments in Westminster, in particular the draft Online Harms White Paper, and monitors for developments and examples of best practice in other jurisdictions as they emerge, in recognition that the issue of e-safety goes beyond any one geographical area.

Conclusion

Barnardo's NI welcomes the opportunity to respond to the draft e-Safety Strategy. We welcome the intention of the draft Strategy to improve e-Safety for all children. Barnardo's NI urges that the e-Safety Strategy reflects the current reality of how digital technology and the internet are incorporated into most aspects of young people's lives. It is important that this Strategy is up-to-date and is continually refreshed to keep pace with the rapid rate of change online. We would be happy to continue to engage with the development of this Strategy and to reflect the experiences and views of the children, young people and families we support as this Strategy is developed further.

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