

# SECOND PHASE OF ONLINE SAFETY REGULATION: PROTECTION OF CHILDREN

## CALL FOR EVIDENCE - RESPONSE FROM THE ANTI-BULLYING ALLIANCE

### ABOUT THIS RESPONSE

This submission is provided on behalf of the Anti-Bullying Alliance, which forms part of the National Children's Bureau, and our represents over 230 members. Please see a full list of our members and more about the work of the Alliance at the end of this submission.

### DEFINITIONS OF ONLINE BULLYING

It is important when considering online bullying (often referred to as cyberbullying) as an online harm that Government, regulators, and services have a shared understanding of the definition of bullying. This will avoid misidentifying online bullying and ensures that we have better data.

The Anti-Bullying Alliance has an agreed definition of bullying across its membership that is based on decades of academic research. We define bullying as:

*“The **repetitive, intentional** hurting of one person or group, by another person or group, where the relationship involves an **imbalance of power**. Bullying can be physical, verbal or psychological. It can take place face to face or **online**.”*

Online bullying is not a one off incident, which does not mean that a one off incident may not be a serious matter that needs action and could constitute an online harm. It simply means it is not bullying. The impact of bullying is severe and it can have a long term impact on a person's life, so understanding what we mean by it, whether it takes place online or face to face, is vital to preventing it and better responding to it when it does happen. We would like to see the Government and Ofcom have a definition of online bullying within its work.

### NOT SEEING ONLINE BULLYING IN ISOLATION

The wealth of research relating to online bullying shows that in most cases of online bullying, the bullying starts face to face (very often in school or in the community) and then 'goes' online. It is rarer for children and young people to be bullied online alone. Children often refer to online bullying as 'another tool in the toolbox' of how children can bully rather than it being something separate from bullying face to face, often referred to in academic literature as 'traditional bullying'.

Online bullying however does present some challenges that can make it a pervasive problem to address among young people:

- **The 24-7 nature of online bullying:** Bullying can take place anywhere not it takes place on our smart phones and devices. Young people tell us this can be very isolating and make the victims feel like those bullying them can reach them any time and any place.



- **The degree of separation:** Without the ability to see a person's reaction to unkind or bullying posts and messages, children say there is often a degree of separation.
- **Anonymity:** Young people say the ability to be anonymous on platforms can add to the frightening nature of bullying that takes place online.
- **A wider audience:** Often with online bullying people can share and reshare bullying content with an endlessly wide audience. This is not the case for bullying that takes place face to face which can add to the impact of the bullying.
- **New and changing technologies:** As the years go by we see the invention of new technology that has the ability to change the way children can bully. For example, with the invent of 'deep fake' technology, this presents us with new ways that children can use technology to bully others. We must encourage services and developers to consider child safety at design rather than the technology existing and children's safety being considered as an 'after thought'.

At the Anti-Bullying Alliance, we believe that to address bullying that takes place online we must also address traditional bullying too whether it be in school or in the community. We should not see online bullying in isolation.

## PREVALENCE OF ONLINE BULLYING

RELATING TO QUESTION 6 IN THE CALL FOR EVIDENCE

There is a range of research about levels of online bullying experienced by young people today. Some of the key pieces of research about the prevalence of online bullying are listed below:

- **Office of National Statistics research 2020<sup>1</sup>:** Estimates of the prevalence and nature of online bullying among children using data from the 10-to 15-year-old's Crime Survey for England and Wales (CSEW). This research found:
  - Around one in five children aged 10 to 15 years in England and Wales (19%) experienced at least one type of online bullying behaviour in the year ending March 2020, equivalent to 764,000 children.
  - More than half (52%) of those children who experienced online bullying behaviours said they would not describe these behaviours as bullying, and one in four (26%) did not report their experiences to anyone.
  - Being called names, sworn at or insulted and having nasty messages about them sent to them were the two most common online bullying behaviour types, experienced by 10% of all children aged 10 to 15 years.
  - Nearly three out of four children (72%) who had experienced an online bullying behaviour experienced at least some of it at school or during school time.
- **The relationship between 'traditional' bullying and online bullying:** Research by Warwick University released in 2017<sup>2</sup> shows that there is a strong link between 'traditional' face to face bullying compared to cyberbullying. It found:
  - Online bullying doesn't create large numbers of new victims.
  - Most bullying is face-to-face – with online bullying used as a modern tool to supplement traditional forms.

<sup>1</sup> [Online bullying in England and Wales: year ending March 2020 – Office for National Statistics 2020](#)

<sup>2</sup> [https://link.springer.com/article/10.1007/s00787-017-0954-6?wt\\_mc=Internal.Event.1.SEM.ArticleAuthorOnlineFirst#citeas](https://link.springer.com/article/10.1007/s00787-017-0954-6?wt_mc=Internal.Event.1.SEM.ArticleAuthorOnlineFirst#citeas)



- 29% of UK teenagers reported being bullied – only 1% were victims of online bullying alone.
- Bullying intervention strategies should focus on traditional bullying as well as online bullying.
- **Pupil bullying, wellbeing and school experiences in schools in England (ABA, 2022)<sup>3</sup>:** In 2022, we summarised the findings from the first collection of our pupil bullying and wellbeing questionnaire which forms part of our United Against Bullying programme. Those findings told us that:
  - Nearly a quarter of pupils reported ever being a victim of online bullying, but much smaller numbers (6%) report frequent online bullying.
  - Pupils who report being bullied online, and pupils who report bullying others online, have poorer experiences at school than those not being bullied. They are also more likely to report poor wellbeing.

### Where does online bullying take place?

Cyberbullying can occur both in public and private spaces online, as it can be done by both people known and people the children do not know.

Ofcom's own research<sup>4</sup> in 2022 found that the most common way for children to be bullied via technology was through text or messaging apps (56%), followed by social media (43%) or online games (30%).

In Internet Matters' November 2022 tracker survey 15% of children said that they've experienced online bullying or abuse from people they know, whilst 13% reported experiencing online bullying or abuse from people they don't know. This shows that bullying is more likely to happen online from people they already know.<sup>5</sup> Also - over one third of victims reported that they had been cyberbullied by a friend, while 22% were targeted by another student at their school, and 11% by someone from another school; only 13% reported being cyberbullied by a stranger<sup>6</sup>

Social media: As technology changes however, the types of media used for cyberbullying may also adapt. A multinational European survey, comprising 3,500 children and young people aged 9 to 16, found that by 2013, only a minority of victims reported being bullied through instant messages, phone calls, or text messages (around 2-3% each). Instead, social networking sites were by far the most common source of cyberbullying, with over half of victims having been targeted in this way.<sup>7</sup> The high rate of bullying occurring on social networking sites was confirmed through a dedicated report on cyberbullying by Ditch the Label, who asked social networking users whether or not they had experienced cyberbullying across a variety of social networks<sup>8</sup>. Findings showed that bullying was common across all sites, with over 50% of Facebook users having been cyberbullied, and around 20-25% of those who used Twitter, Instagram, Tumblr and YouTube experiencing the same.

Other research has also found:

- Metaverse, virtual reality or augmented reality – Cyberbullying or abuse is also ranked as the third most common concern for children (all) when they think about being in the metaverse, virtual reality or augmented reality – with 23% selecting this option.<sup>9</sup>

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<sup>3</sup> [Anti-Bullying Alliance: Pupil bullying, wellbeing and school experiences in England \(2021\)](#)

<sup>4</sup> [Ofcom: Children and parents: media use and attitudes report 2022](#)

<sup>5</sup> <https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters%20Tracker%20Nov%202022.pdf>

<sup>6</sup> Mishna, F., et al., Cyber bullying behaviors among middle and high school students. American Journal of Orthopsychiatry, 2010. 80(3): p. 362-374.

<sup>7</sup> Mascheroni, G. and K. Olafsson, Net Children Go Mobile: Risks and opportunities. Second Edition. 2014, Educatt: Milano.

<sup>8</sup> [Ditch the Label. The annual cyberbullying survey 2013](#)

<sup>9</sup> [https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters\\_Towards%20a%20Child-Friendly%20Metaverse.pdf](https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters_Towards%20a%20Child-Friendly%20Metaverse.pdf)



- 42 percent of adolescents have experienced cyberbullying on Instagram, and 37 percent of them have experienced bullying on Facebook. ([Ditch The Label](#))<sup>10</sup>
- Children ages 9 to 10 are more likely to be bullied on gaming websites, while teens ages 13 to 16 are more likely to be affected by cyberbullying on social media. ([European Parliament](#))<sup>11</sup>

### Who is most at risk of being bullied online?

Research has shown that some groups of children are more at risk of being bullied than others. These groups are outlined below.

- **Age differences in online bullying:** Involvement in traditional bullying is strongly linked to age; as children grow older they are less likely to be bullied, or to bully others. Research has attempted to identify whether a similar trend exists for cyberbullying, however, at present the findings remain unclear. The majority of studies tend to suggest that the likelihood of being cyberbullied is not related to a child's age and this is confirmed by our own research from 2021<sup>12</sup>.
- **Sex differences:** The Ditch the Label report on bullying through social networking sites suggests sex differences may be marginal: while slightly more females than males were cyberbullied often or very frequently (68% compared to 57%), this did not represent a significant difference<sup>13</sup>. Our own recent data shows that male pupils reported experiencing slightly more online bullying than their counterparts but we will look again to see if this trend continues when we release our 2022 research later this year.<sup>14</sup>
- **Sexuality:** Research shows that one in 5 LGBT pupils (19 per cent) are bullied for being LGBT while at school via mobile phone or online.<sup>15</sup> Research also shows that there has been an increase in the number of YP who have personally experienced homophobic bullying or aggression online, from 4% in 2015 to 15% in 2019<sup>16</sup>. On a regular basis across numerous studies and years, research is clear that those youth who belong to the sexual minority are more likely to experience bullying and cyberbullying than their heterosexual peers<sup>20-25</sup>. This was the case in a 2021 sample as well; the rate of cyberbullying victimization among LGBTQ youth was 50% higher than that of non-LGBTQ youth (31.7% v. 21.8%).
- **Children with SEND:** Our own research from 2021<sup>17</sup> shows that children who have special educational needs or disability (SEND) are more likely to be frequently bullied online (5% vs 8%). YouthWorks found that young people with hearing loss were twice as likely to be cyberbullied than their non-vulnerable peers.<sup>18</sup>
- **Young people with an eating disorder:** Internet Matters' research has found that young people with eating disorders are more likely to experience online bullying "...experience of cyberbullying is extremely high for vulnerable groups, in particular those with an eating disorder"<sup>19</sup>
- **Young carers:** 58% of Young Carers and 48% of those in care said they had been cyberbullied compared to 25% of young people with no vulnerabilities<sup>20</sup>

<sup>10</sup> <https://www.ditchthelabel.org/wp-content/uploads/2017/07/The-Annual-Bullying-Survey-2017-1.pdf>

<sup>11</sup> [https://www.europarl.europa.eu/RegData/etudes/STUD/2016/571367/IPOL\\_STU\(2016\)571367\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2016/571367/IPOL_STU(2016)571367_EN.pdf)

<sup>12</sup> [Anti-Bullying Alliance: Pupil bullying, wellbeing and school experiences in England \(2021\)](#)

<sup>13</sup> [Ditch the Label. The annual cyberbullying survey 2013](#)

<sup>14</sup> [Anti-Bullying Alliance: Pupil bullying, wellbeing and school experiences in England \(2021\)](#)

<sup>15</sup> [https://www.stonewall.org.uk/system/files/the\\_school\\_report\\_2017.pdf](https://www.stonewall.org.uk/system/files/the_school_report_2017.pdf)

<sup>16</sup> <https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf>

<sup>17</sup> [Anti-Bullying Alliance: Pupil bullying, wellbeing and school experiences in England \(2021\)](#)

<sup>18</sup> <https://www.youthworksconsulting.co.uk/wp-content/uploads/2019/02/Vulnerable-Children-in-a-Digital-World-FINAL-004.pdf>

<sup>19</sup> <https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf>

<sup>20</sup> <https://www.youthworksconsulting.co.uk/wp-content/uploads/2019/02/Vulnerable-Children-in-a-Digital-World-FINAL-004.pdf>

- Young people with mental health difficulties: Internet Matters has found that 40% of young people with self-reported mental health difficulties report having been cyberbullied in contrast to 23% of those with none<sup>21</sup>. A link between being cyberbullied and visiting pro-suicide websites has been found by Gorzig (2016) who found that both those who were cyberbullied and the perpetrators, were likely to be viewing this content<sup>22</sup>
- **Sexist online bullying:** In 2021, Ofsted<sup>23</sup> found that particularly girls were at risk of a range of sexual abuse including sexual bullying online.
- **Racist online bullying:** Internet Matters has also found that there has been an increase of young people who have experienced racist bullying or aggression personally online, from 4% in 2015 to 13% in 2019<sup>24</sup>
- **Children in receipt of Free School Meals:** Our own research from 2021<sup>25</sup> found that pupils in receipt of free school meals are more likely to experience online bullying than those not in receipt of free school meals.

## THE IMPACT OF ONLINE BULLYING

### RELATING TO QUESTION 7 IN THE CALL FOR EVIDENCE

There is substantial evidence which shows the significant and lasting impact that traditional bullying can have upon a young person's physical and mental health<sup>26</sup>. At this stage, similar research examining the effects of cyberbullying is limited, but there are some indications to suggest that cyberbullying may be as dangerous to a young person's wellbeing as more traditional bullying behaviours.

In Internet Matters' November 2022 tracker survey, out of all the issues experienced online, bullying, both from people they know or do not know, is recorded as having the highest effect on the children studied. 64% of those who experienced bullying from people they know reported it to have had a high effect on them – whilst the number was 55% for those who reported being bullied by people who they don't know.<sup>27</sup> - "Vulnerable children" in the report "includes children with special educational needs and disabilities (SEND), children with mental health problems and children in care."<sup>28</sup>

Research has consistently supported the notion that increasing levels of cyberbullying lead to higher levels of depression. In fact, one study found that 93% of those victimized by cyberbullying reported feelings of sadness, powerlessness, and hopelessness.<sup>29</sup>

Other research has shown:

- One in five students report having skipped school because of cyberbullying. (UNICEF)<sup>30</sup>

<sup>21</sup> [Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf](https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf) (internetmatters.org)

<sup>22</sup> <https://youthworksconsulting.co.uk/wp-content/uploads/2019/02/Vulnerable-Children-in-a-Digital-World-FINAL-004.pdf>

<sup>23</sup> [Review of sexual abuse in schools and colleges - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/Review_of_sexual_abuse_in_schools_and_colleges_-_GOV.UK.pdf) ([www.gov.uk](http://www.gov.uk))

<sup>24</sup> <https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf>

<sup>25</sup> [Anti-Bullying Alliance: Pupil bullying, wellbeing and school experiences in England \(2021\)](https://www.anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Anti-Bullying-Alliance-Pupil-bullying-wellbeing-and-school-experiences-in-England-2021.pdf)

<sup>26</sup> ABA. Focus on: Bullying and mental health. 2015; Available from: <http://www.anti-bullyingalliance.org.uk/media/34591/ABAMental-health-briefing-Nov-15.pdf>.

<sup>27</sup> <https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters%20Tracker%20Nov%202022.pdf>

<sup>28</sup> [https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters\\_Towards%20a%20Child-Friendly%20Metaverse.pdf](https://anti-bullyingalliance.org.uk/sites/default/files/uploads/attachments/Internet%20Matters_Towards%20a%20Child-Friendly%20Metaverse.pdf)

<sup>29</sup> Nixon CL. [Current perspectives: the impact of cyberbullying on adolescent health](https://doi.org/10.2147/AHMT.S36456). *ADOLESC HEALTH MED THER*. 2014;5:143-58. doi:10.2147/AHMT.S36456

<sup>30</sup> <https://www.unicef.org/press-releases/unicef-poll-more-third-young-people-30-countries-report-being-victim-online-bullying>



- Students who are bullied are three times as likely to engage in school violence and delinquency. (Cyberbullying Research Center)<sup>31</sup>
- Non-heterosexual victims and perpetrators of cyberbullying exhibit more depression, social anxiety, and psychopathological symptoms than heterosexual victims and perpetrators. (Media Education Research Journal)<sup>32</sup>
- Students who experience cyberbullying tend to have poor sleep quality and show symptoms of depression. (Sleep)<sup>33</sup>
- One in four students who experienced bullying turned to self-harm. (Ditch The Label)<sup>34</sup>

## TERMS OF REFERENCE FOR SERVICES

RELATING TO QUESTION 11 IN THE CALL FOR EVIDENCE

Terms of reference for service providers are sometimes not accessible. They are often long documents that are not easy to understand. Young people tell us they need clear terms of reference / community guidelines and also value having reminders about behaviour that may break those community guidelines.

## REPORTING HARMFUL OR BULLYING CONTENT TO SERVICES

RELATING TO QUESTION 8, 13, 14, 15 AND 25 IN THE CALL FOR EVIDENCE

Young people have told us that when they report bullying they don't always know what has happened to the report, are sometimes confused about how to report, often feel discouraged by the platform to report (for example by suggesting they do other things or that there are not breaches of their community guidelines) and they don't always feel reports are treated fairly.

They tell us they want:

- Clarity about the behaviour that is expected by service providers: The young people we've worked with talk about not always understanding policies on platforms or knowing what content is acceptable.
- Platforms to be transparent about the type of bullying taking place of their services: We have very little reliable data about what type of bullying is going on and to whom it is happening. We ask that social media companies publish data about the amount of bullying that is happening on their platforms and if there are groups of young people more likely to experience it.
- Services to be better and more consistent when handling report of bullying and removing harmful content: Young people we've spoken to had very mixed feelings about the handling of reports with some having dealt with them quickly but in some cases feeling discouraged to report and not knowing what happened to reports when they are made.
- Report reminders: They wanted for clarity about how to report bullying on platforms. They wanted to make sure these report services are accessible to young people.

<sup>31</sup> <https://cyberbullying.org/bullying-cyberbullying-delinquency>

<sup>32</sup> [https://www.scipedia.com/public/Garaigordobil\\_Larrain\\_2020a](https://www.scipedia.com/public/Garaigordobil_Larrain_2020a)

<sup>33</sup> [https://academic.oup.com/sleep/article/42/Supplement\\_1/A322/5451404](https://academic.oup.com/sleep/article/42/Supplement_1/A322/5451404)

<sup>34</sup> <https://www.ditchthelabel.org/wp-content/uploads/2017/07/The-Annual-Bullying-Survey-2017-1.pdf>



*“SOCIAL MEDIA PLATFORMS SHOULD MONITOR THEIR CONTENT MORE AND ACT APPROPRIATELY” - YOUNG PERSON ON THE YOUNG ADVISORY GROUP*

## HELPFUL FUNCTIONALITY OF PLATFORMS

RELATING TO QUESTION 16 IN THE CALL FOR EVIDENCE

Young people tell us they find it helpful to have control over the content that is seen on their platforms.

For example, the invent of being able to mute users and delete comments as well as automatic functionality such as ordering negative comments to lower in feeds helps to prevent bullying and lessen the impact when it does happen. We would want to encourage services to consider these types of solutions, assess them for impact and think about it from a safety by design approach.

We would like to see companies ensuring that when a child or young person signs up to their platforms that they provide them with the highest privacy security settings as default with things like geo-location settings turned off to help protect them.

## SUPPORTING SAFETY AND WELLBEING OF CHILDREN AND YOUNG PEOPLE ON SERVICES

RELATING TO QUESTION 10, 17, 18, 19, 23 AND 28 IN THE CALL FOR EVIDENCE

### **Safety by design:**

We want to ensure we see that companies are not able to become multi-million user services before they consider children’s safety. We are signed up to the

The Anti-Bullying Alliance is signed up to 5Rights. 5Rights provides a framework of five simple principles for how we should engage with children and young people (under 18s) in the digital world. Supported by a broad coalition of partners representing both adults and young people, 5Rights puts young people’s needs at the centre of how everyone can behave when they design, deliver and consume digital content and services.

The 5Rights framework contains five simple principles:

1. The right to remove.
2. The right to know.
3. The right to safety and support.
4. The right to make informed and conscious choices.
5. The right to digital literacy

### **Training and support for parents/carers, schools and youth services:**

Research from Public Health England<sup>35</sup> has found that:

- young people who reported positive family communication, especially with a father, were less likely to experience online bullying.

<sup>35</sup> [Public Health England: Cyberbullying: An analysis of data from the Health Behaviour in School-aged Children \(HBSC\) survey for England, 2014](#)



- positive perceptions of the school environment were associated with lower levels of online bullying.
- online bullying was associated with feelings of safety in young people's local neighbourhood.

The research showed that by far the most important factor in reducing the likelihood of a child being bullied online was positive perceptions of the school environment. Therefore, we know that if we want to protect children from online bullying, as well as addressing the service providers themselves and we have to ensure that school staff, youth workers and parents and carers have the skills and knowledge to prevent online bullying and provide children.

#### **Education:**

In 2021, the government introduced a new relationships and sex education curriculum<sup>36</sup>. This curriculum includes a number of areas<sup>37</sup> relating to online safety and online bullying that we believe will help protect children from online bullying. We want to make sure however, that the quality of this education is of a high standard, so we'd like to see a review of the impact of this new curriculum and training and resources made available to teachers to deliver this curriculum effectively.

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MARTHA EVANS – DIRECTOR OF THE ANTI-BULLYING ALLIANCE

On behalf of core members of the Anti-Bullying Alliance  
March 2023

## **APPENDIX 1 – ABOUT THE ANTI-BULLYING ALLIANCE AND OUR CORE MEMBERS**

The Anti-Bullying Alliance (ABA) is a unique coalition of organisations and individuals, who work together to stop bullying and create safer environments in which children and young people can live, grow, play and learn. ABA is hosted by the National Children's Bureau. [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

The Anti-Bullying Alliance organises Anti-Bullying Week each year, which takes place in over 80% of schools in the UK. We have a whole-school programme called United Against Bullying which works to support schools to take a whole-school approach to preventing and responding to bullying and provides a particular focus on bullying of those most at risk. In 2022 we provided CPD training, including training covering online bullying, to over 40,000 participants.

We have three key areas of work:

- Raising awareness of the impact of childhood bullying and how adults can prevent it and respond to it more appropriately through campaigns
- Practice improvement through providing training and resources to the children's workforce
- Working with national, devolved and local government to improve policy relating to childhood bullying

To work effectively within these three areas of work, we ensure we bring the anti-bullying sector together to learn from and share best practice; listen to the voices of young people – we have a vibrant Young ABA group of young people from across the country we work with regularly; and ensuring our work is underpinned by a strong evidence base.

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<sup>36</sup> <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

<sup>37</sup> <https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/whole-school-and-setting-approach/curriculum>



ABA are supported by an elected Advisory Group that includes representatives from the NSPCC, Kidscape, Ditch the Label, Wandsworth Council, Childnet, NASUWT, Mencap, Nottingham University and is chaired by Claude Knights. ABA coordinate Anti-Bullying Week each year.

You can find out more about our 230 members at our website here: [www.anti-bullyingalliance.org.uk/membership](http://www.anti-bullyingalliance.org.uk/membership)