Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.
Is this a confidential response? (select as appropriate)   No
Social Network/Media site similar to FB. We offer a range of topics and services in which members can communicate with other members and post videos, blogs, discussion topics and a general discussion forum.   All members both public and business are ID verified/business registered and are both fee paying members via a monthly subscription.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?
Is this a confidential response? (select as appropriate)   No
Any social platform / gaming platform / video platform Etc, is likely to attract children and persons of a certain disposition (healthwise or other).

Question 3: What information do services have about the age of users on different platforms (including children)?
Is this a confidential response? (select as appropriate)   No
For my site, It is an absolute requirement that all members (children, adult, business) must submit a valid ID document and be a fee payable subscription member. Children who wish to become a member must have an adult create a Family membership.

Question 3: What information do services have about the age of users on different platforms (including children)?

Not surprisingly, I have found little actual evidence that many services have any real information about the ages of children. Apart from what information children use to fill in the signup form.

My reason for this is that when people sign up to many sites they are not challenged to provide any proof of age such as organisational ID Cards or Citizen ID cards or subscription payment service capability to only allow users of a certain age.

I know this would or may not be enforceable to foreign social/media companies in other countries.

Question 4: How can services ensure that children cannot access a service, or a part of it?

Is this a confidential response? (select as appropriate)

No

Using my site as an example, I would make it requirement that all social/media sites have a mandatory ID and subscription policy on new member signup.

Also, all sites should be "none accessible" to every person (child or adult) that has not registered via the above mentioned.

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

Is this a confidential response? (select as appropriate)

No

All social/media sites have a range of Tech services available to use. These Tech products can allow people to upload a copy of ID document so that companies can verify such documents. Also companies can use PayPal payment services to accept card payments.

Examples are:
Yoti / Citizen card, Passport office, DVLA/DVSA, NHS (for nhs employees) Organisational ID cards.

We have heard much about Algorithms as a tool. Yes they work upto a point but they can

be manipulated and circumvented by any person of any age, children do it all the time. just by changing words or behaviour, but what is even better is a real person actively monitoring members.

Also the best way of protecting children and adults is an active moderator that is responsible for monitoring site subjects such as video, forum and also contactable by members to report any issues.

Yes this is a big ask for any company, but if you want to protect members of any age you need a real person or team of people.

Sometimes it is good to keep one foot in the past whilst working with the tech and demands of the present and future.

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Is this a confidential response? (select as appropriate)

No

There is so much evidence out there that in a way people are becoming blind to the dangers of harmful content to the point that the harm is hidden in overpowering generality "good facts" rather than "Actual facts" or a "good lie" verses "actual lie". It all comes down to wording and ideology.

Search sites are fantastic to research required information. Site like Google, Bing. But the amount of sites on them that on the whole good and useful there are many more that are more dangerous to the point of actual mental or physical harm should any person in a state of desperation or other medical upset starts to view such sites as factual to the point of such sites information debunking actual factual information such as NHS information relating to illness or education or other social issues.

More than ever there are numerous sites dedicated to highlighting global, social issues, health issues, video sites which in themselves are a good thing. However more and more they are becoming viewed as 100% factual. However just try and debate the subjects and youll be Trolled or abused online.

For every Factual site there is a Debunker site and both are working in a way that will draw children and adults in and if said people are easily drawn in to that site then we start to see problems and in many cases hard to leave the sites.
In some way it is linked to the same tactics as indoctrinations or cult behaviour.

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

Children and adults that are of a certain disposition can and are easily drawn in to believing perceived "Good Facts" simply because they can be seen as "actual facts".

Il start with the Cosmetics and Beauty Industry. We tell our children that they are beautiful they way they are and the cosmetics and beauty industry also promotes this ideology. Yet at the same time telling children that they can be looking even better if they wear this type of makeup and dress in their branded clothing.

Children are being bombarded with mixed messages every day by companies.
Another example: Lip fillers, blemishes, cosmetic surgery, hair loss.
I mean, Hair loss ? its not a hair transplant or treatment you need if your worried, it's a councillor to help you get over your social anxiety about what you think others will say about you.

Its so many types of information out there that children are growing up with confusion, anxiety, dysmorphia, and other issues.

Ive seen it in my family where my niece (age 14) was convinced she was lesbian by a small twisted element of the lesbian community and shown booklets, videos, group meetings, gay parade celebrations, just because she was a tomboy. As an adult she got married and adopted a child. After a couple of years she learned she was not a lesbian. Now she is happily married to a man and has children happily married.

Children and adults can be drawn in to convincing "good truths" rather than "actual truths"

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Speaking for my company. I use the old saying, "if it looks like a duck, quacks like a duck", then it's a duck. Unless it's a goose.

To start with you have to use common sense and an understanding of regional, national and intranational language, context and packaging of the information and video.

"look like a duck" = Information has to look right, "sound like a duck" = be contextual from start to finish. Understandable in the meaning of what is being said, packaged and presented. Then this is a duck.

"then its goose" If some or none of the above match a duck then it's a goose. Might look and sound like a duck but unless you understand the sound a duck makes compared to a goose. You need to understand how a goose talks compared to a duck.

It is this method that will help protect children and adults.

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

No

I find that:
 a high dependency on Tech especially Algorithms is a factor.
Algorithms are (to some degree) viewed as the holy grail of security and monitoring.

In reality, Algorithms are only an aid to the sites security or moderators. It still takes a real person to make a proper person to actively deal with an issue.

I have asked several sites about "sharing" of limited information for security perposes.
In relation to abusers/criminals or rule breaks.
In principle most online abusers/criminals have several accounts on many platforms. If they abuse on one site, they abuse on another.
If we want to get rid of the problem, we need to work together and share info such as IP address, email, location, name. If companies shared such information then every site can ban this person or group leaving nowhere for the abuser/criminal to go. So fare ive not had a good reception. Until companies are willing to share, then this problem will continue to grow.

Also, Banning/deleting/closing of member accounts. One big example of not banning/deleting/ closing membership accounts is FB. People report crime, abuse all the time but they are met with the standard messages saying that the abuser/ad/criminal has

not broken the rules. I mean, it's a crime and abuse. Sure if a real person was dealing with things then the person would and should be banned/deleted/membership closed.

It things like these that abusers and criminals love. Being allowed to carry on.

Also site that do not require ID verification to become members. If people knew that had to provide ID then they are less likely to break the rules. They know they would be identified. They "Abusers/criminals" thrive in that area. They can be who or whatever they choose "child, adult, company, a penguin whatever they like.

Sites need to enforce the rules, be more proactive and be open to collaboration with other sites. Create a safer and better place for all people and businesses. We need to plug the gaps and make it more difficult for people to do bad things online. We need to get rid of "anonymity" and create "accountability".

If companies choose not to, then we do need outside regulation (ofcom/ico) to force companies to be better.

Is this a confidential response? (select as appropriate)

No

Speaking for my site only.
I have simple rules and a member guidance policy. Keeping them simple but direct as to what is required and the punishments for breaking the rules.

We actively tell all members that all personal and member information is openly viewable by all uk police forces both in the uk and overseas territories.

Any abuse/criminal acts can and will be reported to Law enforcement.

We only have real person moderators, admin and security. All contactable to get assistance.

Who are we accountable to: simple, the members, Ofcom and ICO and the UK law.

Who makes the decisions. We all do. Each person follows the rules and id any member breaks the rules then it is dealt with according to the rules.

No matter the type of membership: regular, family and child, Business, everyone is

moderated and protected the same. We do not allow rule breaking. Any such issues will be dealt with.

In matters of abuse against children or the vulnerable or any member. We have a policy that's states: If we have a "report" from child or a child friend or any person, then security will access the child account "family account" gather evidence, and based on the evidence either contact the police for advisement but in any case we will personally contact the parent/guardian and update of the issue. Also we will immediately put a block on the abuser/criminal account so that they can not access their account and delete evidence. Should the police want access to the site for evidence gathering, then they will be given "full and open" access with the ability to access member account, messages, friends lists and other activities. This is our policy on member safety, whether it is a child or adult or company.

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

Is this a confidential response? (select as appropriate)

No

Our site: We stay away from corporate looking and wording TOS and PPS and our Member Guidelines Policy. In any case we know 90% of people don't read them let alone understand them especially if you're a child.

So we keep our self made and personalised TOS, PPSand MGP simple, easy to read, understand and to the point. (keep them crystal clear) no matter if you're a child, an adult, company theyre simple. Obey the rules or your account may be closed. Simple.

And to some degree, TOS and PS documents are not legally required. More of a decoration. They are just a basis to set boundaries but no real power.
and if site have the wrong TOS,PPS then it makes no point having them.
From what ive seen, most sites have generic TOS and PPS that you can get online and mostly from the US that have little or no legal standing in the US not to mention in the UK or EU.

This is what sites should think about. Keep TOS,PPS short, simple, easy to read and understand and what will happen if rules are broken.

Is this a confidential response? (select as appropriate)

No

For our site only:

WE embrace the "primary priority", "priority" harmful content.

Our TOS,PPS and MGP state what is not permitted and what will happen should these rules against such issues are reported or found.

We have a structure of moderators, admin, security and one other secret group. We call "Marshalls"

While the moderators, admin, security are openly doing their thing, our "marshalls" are doing theirs.

What is a Marshall ?. The "marshal" is a chosen group of ordinary members that act as a secret security and guidance officer. Nothing like sheriffs and marshals like in the cowboy films but more like a person or "event usher" that can guide others to report issues, or report issues discreetly on others behalf directly to admin or security.

They are not listed as marshalls like admin or security are, this means that they can get into places, become friends to criminals, abusers, or other rule breakers without arousing suspicion. They are the secret eyes and ears of our site. Much like undercover police officers. Much better than any algorithm.

Is this a confidential response? (select as appropriate)

No

Simple, Sites need to have an open and engaged moderator, admin and security staff. When members of any age know that they can talk to a real site staff, then you create a community.

Being openly and fully engaged with members then questions of required help or general assistance will be a simple thing to deal with. Engagement will create a trust and friendship between site and user. It is this mechanism that will in turn enhance awareness, trust and the ability for members of any age to know who to talk to (admin, moderators or security) and where to find them. This too is simple. Members just look on the Members list. All site departments are listed as, moderators, admin and security).

---

[1] See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Is this a confidential response? (select as appropriate)

No

For our site only: The best practice is just to listen to members. They may not ask or state directly that they have an issue/problem. So you have to assume they contacted you for a reason.
It is this thinking that will convince staff to investigate further, secretly without notifying the member. Curiosity is the key to a good outcome. Much like a detectives ABC of solving a crime.

Firstly: Be curious but not intrusive or pushy. People especially children will shut down/ close up and then you have lost the connection and trust.

A: ask questions. B: believe nothing, C: corroborate everything.
F: follow the evidence. I: identify all involved. Also: know that many people especially children don't always know how to structure complaints or concerns. So just listen and concentrate on what they mean rather than the words they speak.
Ensure evidence preservation. By suspending accounts access to prevent deletion or alteration.

If needed, contact Police for advisement or Police action.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Is this a confidential response? (select as appropriate)

No

As question 14.

For our site only: The best practice is just to listen to members. They may not ask or state directly that they have an issue/problem. So you have to assume they contacted you for a reason.
It is this thinking that will convince staff to investigate further, secretly without notifying the member. Curiosity is the key to a good outcome. Much like a detectives ABC of solving a crime.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Firstly: Be curious but not intrusive or pushy. People especially children will shut down/ close up and then you have lost the connection and trust.

A: ask questions. B: believe nothing, C: corroborate everything.
F: follow the evidence. I: identify all involved. Also: know that many people especially children don't always know how to structure complaints or concerns. So just listen and concentrate on what they mean rather than the words they speak.
Ensure evidence preservation. By suspending accounts access to prevent deletion or alteration.

If needed, contact Police for advisement or Police action.

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

Is this a confidential response? (select as appropriate)

No

For our site only.

Not including members reporting issues, We have a multi line of defence for monitoring and reporting.

1, We have standard functions such as a "report" tab/button on all posts/comments, uploaded contents. This is a standard function on most sites.

2, Also we have active moderators that each have their own department to monitor and deal with posts/comments and reports. They monitor only their Section all day looking for rule breaks, issues and harmful content and generally engaging with members.

3, We have our secret "marshalls" who also monitor sections and report any rule breaks and other posts that are harmful and report it to moderators, admin or security.

So if one function misses the issue we have another 2 who hopefully will not.

In any case, we will find the issue and deal with it.

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Is this a confidential response? (select as appropriate)

No

A financially lucrative service can adopt a fantastic tech department to create functions or buy in services to carry out a range of services and functions or features. Should the tech not be subject to flaws, manipulation and circumventing by members or other tech.

But for us small less financially able sites, the best we can do is put real people in the place of Tech.
Get members involved in the community. This is much better then Tech in my experience.

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

As I have mentioned previous. Best practice for the safety, wellbeing of all members is active engagement between site and members. Create a safe place where site and members work together, build trust and a community.

Let all members know site staff are here for them at any time.

post reports of scams, cyber crime, remove harm, education topics and so on. Remove abusers/criminals from site membership.

Site has to be open minded, listen, understand and if needed direct members with complex issues to the right source of help.

Sites should not be managed like a "us and them" mentality but as a "we and our"

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

Is this a confidential response? (select as appropriate)

No

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

For my site only:
It is difficult to mitigate any risk posed by algorithms. Techs and groups will always find ways and tech to circumvent ways round, through, under or over algorithms. Them tech companies will try and create tech and other algorithms to combat this. So it's a never ending cycle.

The best way is active real person moderation. An actual real person monitoring all new posts and uploads onto the site. Should any issue arise then moderator can delete item or upload content and also deal with uploader according to the TOS.

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

Is this a confidential response? (select as appropriate)

No

Yes, but as it will always come down to either finance or tech.
Sites need money to buy or create tech also employ people.

But in any case it will eventually comedown to people power.
Sites need to be less reliant on tech and focus more on staff.

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Sadly, there is little or no automated systems. I have spoken to many techs from around the world and they all say the same. Even the best tech cant stop harmful content. At best , we can only manage a losing battle.

reason is, there are too many criminals and certain governments whose aim is to bring down sites, flood the internet and social sites with viruses, harmful content. Even the worlds biggest sites gave up this fight long ago in favour of just managing harmful content. Though all agree, the best practice is people power.

Question 22: How are human moderators used to identify and assess content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

As mentioned many times.

We use moderators to monitor each section visually. Checking all uploads and interaction. As issues are identified, they are dealt with according to TOS.

Each site feature/service has its own moderator. Any issue is deleted upon awareness or passed over to admin or security for further advisement or investigation.

Question 23: What training and support is or should be provided to moderators?

Is this a confidential response? (select as appropriate)

No

Moderators are left to use their own common sense of what is right or wrong.
Also with the knowledge of site TOS,PPS and MGP they know what is the correct thing to do is.

If it is porn, abusive, trolling, then that is a account closer offence. Also police action may be required.
General misbehaviour is a warning offence.
 a third warning is a account closer offence. Life time ban.

Our site rules are simple and clear. So moderators know what is required.
Also, staff discussions talk to each other and learn what is the latest scam, or issue doing

Question 23: What training and support is or should be provided to moderators?

the rounds on site or on other sites.
This way moderators know what to look out for in regards to future problems.

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?

Is this a confidential response? (select as appropriate)

No

Our site uses little automated systems. Moderators, admin see systems as a notifications tool only. We still believe in people first and foremost as the first line of defence.

As far as relative scale. People relates to 99%. Systems hardly play any relative part in site function. The most part the automated system plays is in the "reporting" system which members use to report content.

Systems have bias that could give false negatives or false positives and to some degree open to manipulation from outside interactions.

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?

Is this a confidential response? (select as appropriate)

No

Simple, if harmful content is reported or found my staff it is instantly removed from public view.

Depending on content, site will either reprimand uploader or in sever cases may close member access and start investigations and if required, ask police for advisement or police action.

In any and all cases the harmful content is removed from full site in its entirety. This is in accordance with site TOS,PPS,MGP

Question 26: What other mitigations do services currently have to protect children from harmful content?

Is this a confidential response? (select as appropriate)

No

Again. We have people. Moderators and our Marshalls to monitor and action any needed response to protect children and adults equally. Site TOS,PPS,MGP treat all members equally.

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?

Is this a confidential response? (select as appropriate)

No

Since children are only members of the site through a parent/guardian "family" account. Any child posting content or trying to circumvent systems, again we have service moderators monitoring constantly.
As soon as an issue is discovered originating from a child then this requires site security to contact childs parent/guardian and inform them of the issue.

Hopefully this will be enough to resolve the issue of the first instance.
Should there be a second or third then this will be account closer where the entire family could be banned from the site or at least be banned for a period of 7 days.

The parent or guardian is solely responsible for the account and the childs behaviour on the account.

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

No, not at this time.