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
Ygam are an award-winning charity working to prevent children and young people from experiencing gaming and gambling harms through awareness raising, education and research. Through a portfolio of evidence-based programmes, we develop and deliver training and resources for a range of groups who have influence over children and young people. This includes training teachers to deliver sessions on gaming and gambling harms as part of the PSHE curriculum. Ygam also provides workshops for parents, faith leaders, health professionals, university staff and community groups. The charity reached over 2 million children and young people in 2022, and has recently published its new strategy "Safeguarding our Digital Generation".

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
Identifying what factors might indicate that a service is likely to attract child users is complex. An important example of this is the Advertising Standards Authority (ASA) code which forbids gambling advertising from being of 'particular appeal to children and young persons'. However, what adult professionals might deem to be 'of particular appeal' to children is often out of step with what children actually find appealing. Companies may decide that adverts using cartoons might appeal to children so shouldn't be allowed. However, research from the University of Bristol in relation to gambling advertising and its appeal to children and young people found that gambling adverts on social media channels featuring cartoons were the least appealing to children, with more subtle adverts (content marketing such as political memes or other jokes), which did not breach regulations, of greater appeal.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Decisions about what might attract a child user should be undertaken in conjunction with children to ensure any policy is effective. The voices of children and young people must be at the heart of our work if we are to collectively understand factors are likely to attract child users.

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Research published in 2021 by the University of Bristol looked at the gambling advertising and its appeal to children and young people. The online survey of 210 children (11-17), 222 young people (18-24), and 221 adults (25-78) showed nearly half (45%) of children and almost three-quarters of young people (72%) saw gambling advertising on Twitter at least once a week. A quarter of children (25%) and more than a third (37%) of young people reported seeing it daily.

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

The University of Bristol research referenced in Q6 also found that 19 out of 24 gambling ads on Twitter were twice as likely to appeal to children and young people than older adults, with young people reacting most favourably. Nearly two-thirds (15 out of 24) of gambling adverts prompted positive emotions for young people, such as excited, happy, or delighted, whilst less than a third (seven out of 24) prompted a positive emotional response among adults. By contrast, adults were found to be four times more likely to react negatively, feeling distress, anger, or tension when exposed to gambling ads.

Most notably, the study findings showed disguised gambling marketing and ads for betting on esports were nearly four times more appealing to children than adults. It also revealed nearly half of children are exposed to such advertising weekly and around a quarter encounter it daily.

This could indicate that children and young people may be more positively disposed towards gambling, and potentially more likely to engage with gambling content after seeing advertising.

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

Response not provided as question not applicable to our organisation

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

Thinking about online harm in the context of engaging in gambling, evidence suggests that risk factors for addiction in young people include impulsivity, being male, experiencing depression, using substances such as alcohol, tobacco, cannabis and other illegal drugs, poor academic performance, having peers who gamble, participating in a higher number of gambling activities and starting to gamble at an earlier age. PHE's Gambling-Related Harms Evidence Review provides a detailed overview.

Whilst gaming harms are not identical to gambling harms, some of the same risk factors exist. Environmental factors such as cultural, socioeconomic, parental and external stressors have been suggested as risk factors which may influence the experience of Internet Gaming Disorder, particularly those which relate to the family environment.

Services should consider preventative campaigns focussed on informing both young people and parents/carers about the potential harmful consequences of excessive video game engagement.

Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?

Is this a confidential response? (select as appropriate)

No

Response not provided as question not applicable to our organisation

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

Providers of online services should develop practices which enable young people to co-produce the information on terms of service and public policy statements for children of different ages. This would ensure that the information is provided in a way that is meaningful and clear, and services and their stakeholders would be reassured that they had done all they can to help communicate this important information to their younger audiences. Often, engagement with third sector organisations which regularly engage with children and young people can help support the development and co-production of this type of information.

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?[1]

Is this a confidential response? (select as appropriate)

No

Response not provided as question not applicable to our organisation

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Is this a confidential response? (select as appropriate)

No

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

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Similarly, to the response to Q11., we would advocate for the co-production of these mechanisms with children and young people, ensuring that the visibility, usability and clarity of these mechanisms are tested throughout the design process.

However, accessibility alone is not sufficient to ensure the mechanisms are understood and used by children and young people. It is important to invest in services and campaigns which raise awareness of the availability of these tools and importantly, to ensure children and young people are empowered to use them, understanding why they will be useful to them and in what circumstances they can be used to keep them safe online. This could be delivered through school-based education. Key to this will be clarity of language, consistency of message, and co-production, making the tools easy to flag and use.

Parents' awareness is also critical to the success of these tools. Often, parents may not be aware that platforms have functionality which allows them or their young person to report concerns, and may not trust that the service will act on what they flag and critically, report back to them what has been done following the report or complaint.

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

Response not provided as question not applicable to our organisation

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

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)?

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Services should adopt effective age restriction and age verification which ensures that no person under the age of 18 is exposed to any form of gambling content before they reach the legal gambling age.

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

Services should adopt effective age restriction and age verification which ensures that no person under the age of 18 is exposed to any form of gambling content before they reach the legal gambling age.

Services could restrict or provide extra controls for children and young people to prevent their exposure to gambling-like content before they reach the legal gambling age. This includes free-to-play games as well as some in-app purchase mechanisms.

Services should ensure they provide immediate support when reporting an issue, including signposting to external services that can provide advice and support.

Services should provide information and awareness campaigns for parents, which encourage engagement and support them to understand why they should be interested and engaged in their children's exposure to gambling and gambling-like content.

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Is this a confidential response? (select as appropriate)

No

Moderators should receive training to understand why gambling content can be harmful to children and young people, and trained to spot and respond to content which suggests or may contribute to gambling harms. This training will help raise awareness of why they should be looking out for this type of harmful content and in what contexts it may be harmful, as well as encourage them to actively look for this.

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

Response not provided as question not applicable to our organisation

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

Response not provided as question not applicable to our organisation

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

Is this a confidential response? (select as appropriate)

No

Response not provided as question not applicable to our organisation

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

Children could be better protected by services also providing:
- Parental controls.
- Awareness raising and education about risks, provided universally through, for example, school-based education.
- Clarity about consequences for breaches, and in the absence of regulation, services could establish internal KPIs designed to encourage ways of working which reduce those instances of children attempting to or successfully circumventing the mitigations in place.

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

Other measures could include services being required to invest in awareness raising and education about risks, provided universally through, for example, school-based education, delivered by expert, independent organisations.