

BT Group's response to Internet Safety Strategy Green Paper

Thank you for the opportunity to input into the government's Internet Safety Strategy.

We have completed the online survey but thought it would be helpful to expand on our response as the online survey does not allow for an evidenced based response.

We share the government's ambition to make Britain the safest place in the world to be online. We believe that the current multi-stakeholder self-regulatory approach, particularly where ISPs have worked together, has made the UK a world leader in online child protection. This has allowed children to reap the benefits that the internet offers whilst improving online safety via technology tools and providing the education, awareness and skills to children, parents, and teachers need to manage and avoid risks. The Internet Safety Strategy should build on this approach, which has helped to make the UK one of the safest places to be online.

There continues to be the myth that young people are digital natives. They are brought up surrounded by technology and are voracious consumers but they do not know how it works or how it influences and shapes their lives. They do not understand the commercial realities of the digital world. BT has made a long term commitment to build a culture of tech literacy, preparing the next generation to be savvy, empowered digital citizens who know what it takes to navigate the digital world, keep safe and protect their data.

In partnership with 5Rights¹, the civil society coalition, Baroness Kidron and children aged 8-13, we ran an innovation hothouse² to look at ways we might actively educate children on the commercial realities of the internet. This highlighted the need for a comprehensive approach to online safety. It cannot be all about access but must encompass, for example, deliberate targeting of children to suck them in. The children at the hothouse also recognised the challenge of addiction to gaming and other online activities that has an impact on their mental well-being and sleep. These online risks need to be addressed in the Strategy and we welcome the recommendation in the Green Paper "Transforming Children and Young People's Mental Health Provision" that the government will set up a working group of social media and digital sector companies to explore what more can be done to keep children safe online, in terms of the impact of the internet on their mental health and wellbeing.

It is important to highlight that access to pornographic images was the main online risk four years ago but today research³ tells us that children, parents and teachers are more worried about harmful online behaviour and content on social-media platforms. As a consequence it is appropriate that these online risks should be the key focus of the government's Internet Safety Strategy.

We want to protect our customers when they go online but we also stand up for the right to communicate openly, whenever and wherever possible. We believe in the right to access information online and are clear when we will restrict free expression by blocking online content. We block access to child sexual abuse images. We block malware to protect our customers' communications and our network. When a court orders us to, we block material which infringes other people's rights. Our parental control tools give customers choices over blocking certain content on devices in their homes. The government should respect this balance so everyone can make the most of being online in a safe and positive way.

¹ <http://5rightsframework.com/>

² <https://www.youtube.com/watch?v=fv-cCT5HG1s>

³ BT and Unicef research published in Dec 2016 (part of Unicef & BT schools online safety programme The Right Click: Internet Safety Matters) found teachers' biggest concern for their pupils was cyberbullying (79%) which was also the most frequent internet safety discussion parents have with teachers (71%).

BT has long taken the issue of online safety very seriously. We have invested millions of pounds to provide and promote free technology products and services to help protect against harmful content online. In 2014, we helped found Internet Matters, the online portal that provides safety advice to parents and teachers to keep children safe online. We are also a member of the Royal Foundation Taskforce on the Prevention of Cyber-bullying which recently launched the campaign Stop, Speak, Support, to promote the first national, youth-led online code of conduct for the internet. We have donated substantial advertising space and used our marketing channels to promote the campaign to over 2 million people.

BT also has a partnership with The Marie Collins Foundation that supports their national training programme "*Click: Path to Protection*" for front-line child protection professionals to help children and their families who have suffered online sexual abuse and exploitation. To date over 3000 front-line child- protection professionals have received the training. I attach a list of commitments (see Annex) that BT has made as a member of the Alliance to Better Protect Minors Online⁴ to highlight our significant investment and commitment to making the internet safer.

BT is also committed to, and working with, the new age-verification regulator (British Board of Film Classification) and DCMS to ensure that the age-verification framework established by the Digital Economy Act to prevent access to pornographic material by minors is as effective as possible.

Please find below comments on the government's proposals. However, we have restricted the response to those questions that are most relevant to BT's business of providing fixed-line and mobile voice and broadband services.

Social media code of practice

BT welcomes a joined-up approach to online safety via a voluntary code of practice as it should help ensure that online safety policies are consistent across social-media platforms.

BT supports the suggestion that the code should cover how to identify illegal content and contact, and report it to the relevant authorities. Where appropriate, eg, for offensive and pirated content, the code should also cover a mechanism for removing this content from the platform sooner rather than later, to address the offence or infringement quickly.

Transparency report

BT is committed to transparency regarding our approach to tackling online harms facing our customers via our publicly available transparency report *Privacy and free expression in UK communications*⁵. We have also provided information to Ofcom for its four reports on *Internet safety measures – Strategies of parental protection for children online*, which reported on internet filters and online safety, including measures put in place by BT and the other main ISPs.

If social-media companies are required to publish an annual transparency report, the reporting requirement should include information that helps inform future policy interventions, is not disproportionately commercially sensitive, and does not require an unreasonable amount of time to provide. The transparency report should also have clear and easily understood metrics that should not be open to misinterpretation.

The requirement to publish an annual transparency report should be aimed at those social-media companies whose users are at the greatest risk of experiencing online harm.

⁴ <https://ec.europa.eu/digital-single-market/en/alliance-better-protect-minors-online>

⁵ <http://www.btplc.com/Thegroup/Ourcompany/Ourvalues/Privacyandfreeexpression/index.htm>

Social-media levy

BT notes the proposal for the introduction of a social-media levy to support greater public awareness of online safety and enable preventative measures to counter internet harms. BT and the other main ISPs have led the way in supporting public awareness and education by founding Internet Matters in 2014 in response to then Prime Minister David Cameron's call to help crack-down on online pornography and to make the internet safer. BT and the other founding members of Internet Matters have recently announced that they have agreed to back the scheme for another three years. The founding members have jointly invested more than £6m, and that will rise to £10m over the next three years. Internet Matters has been a proven success with more than 5.5 million visits to its advice website, of which over 70% were identified as new. Visitors mostly look for help and advice managing their children's social media problems, as well as with cyber-bullying. After visiting the site, 78% of parents say they will talk to their child about online activity and safety, and 84% of parents feel more confident handling issues that might come up in the future after visiting the website. Internet Matters recently published an Impact Report⁶ to highlight how its work has encouraged parents to keep their children safe online since it was launched in 2014.

BT welcomes the acknowledgement that companies (of which BT is one) have already invested heavily to improve the online safety of their users including working with charities. Those companies whose users are at greater risk of experiencing online harm and have not invested in improving the online safety of their users should be eligible for a social-media levy.

Funding raised by a social-media levy should be targeted at existing and new initiatives that:

- address online harms that have been clearly identified by the government's internet safety strategy
- have a demonstrably impact on improving internet safety
- do not lead to duplication or fragmentation
- can be easily scaled up, for example, Internet Matters which continues to attract support from companies such as Twitter, Facebook and Huawei.

Industry needs to play a key role on how funding raised from a social media levy is used. This may involve setting up a new independent body comprising industry representatives, which is transparent to government on the impact of levy funded initiatives.

Technological solutions

BT has invested millions of pounds in providing and promoting increasingly advanced free technical solutions to help keep customers safe online. Currently, BT promotes a large variety of free parental control tools (network and device) for home and mobile, public wi-fi and on demand TV content. BT also offers and promotes tools to protect against cyber-crime and security threats. These are listed in our commitments document to the Alliance to Better Protect Minors Online (see Annex). BT continually reviews these online safety technology products and services to ensure relevance to customer requirements, technology developments and new online threats.

There are many online safety technology products and services available to parents who can feel overwhelmed by choice. To help parents navigate which products and services best meets their family's needs we have worked with Internet Matters to provide easy to understand guidance and advice. We welcome the government's request in the Strategy for UKCIS to streamline and signpost information that is available to parents and schools and we envisage Internet Matters playing a key role.

⁶ <https://www.internetmatters.org/about-us/impact-report-2014-2017/>

Developing children's literacy

BT believes that schools can and do play a leading role in educating and helping children manage online risks and welcome the government's decision to ensure that digital literacy plays a role in upcoming new compulsory education subjects. Government, industry and civil society should work together to develop the most effective way of updating the curriculum to provide children with the skills and tools required to stay safe online which includes teaching children to be critical thinkers so that they can interpret content encountered online, help them navigate a digital world confidently and are in control of it. For example, The Digital Competence Framework in Wales puts digital competence alongside literacy and numeracy as a cross-curriculum responsibility from early years and includes topics such as learning about their digital footprint, understanding how digital usage is tracked, how it is used, and guarding against scams.

The consultation asks if the technology industry has a role to play in supporting children develop their digital literacy skills. BT has been engaged in successful partnerships with civil society to support children develop their digital literacy skills. For example, between 2014 and 2017, BT in partnership with Unicef UK delivered a schools-focused support programme called The Right Click: Internet Safety Matters⁷, which consisted of a series of interactive workshops in primary schools to equip parents and teachers with the tools to keep children safe online. BT volunteers delivered 527 workshops, reaching more than 8,000 children and over 5,200 parents. BT trained 1,300 teachers to redeliver the workshops to even more children and parents meaning the impact of the programme will continue long into the future. Furthermore, Internet Matters has a dedicated schools section that provides a diverse selection of teaching resources, online safety training, policy and guidance and parent support resources to help engage with children on a number of online safety issues.

Through our commitment to build a culture of tech literacy we have a target to reach five million children in the UK by 2020, focusing on helping primary school teachers become more confident with the computational thinking concepts that are the building blocks required for any future job. In partnership with the British Computing Society (BCS) BT is upskilling primary school teachers to deliver the computing curriculum through the Barefoot Computing programme providing free resources and volunteer-led workshops to take teachers through the materials available. Over 1.5 million children have been reached through c 50,000 teachers across the UK. Barefoot Computing is now used in over 50% of primary schools in England and Scotland and 40% in Wales and Northern Ireland. A campaign starting in January will encourage further uptake through a new lesson plan for 5-7 year olds to get them discussing online safety while playing a fun 'Safety Snakes' game with a programmable Beebot.

BT looks forward to continuing to work with government, industry and civil society to realise the ambition to make Britain the safest place in the world to be online.

I would be happy to discuss the points raised in this letter further if required.

Yours faithfully

Julian Ashworth
BT Group Policy Director

⁷ The Right Click: Internet Safety Matters programme was a three year partnership between Unicef and BT which ran from 2014 to 2017.

Annex

Commitments that BT has made as a member of the Alliance to Better Protect Minors Online.