BBC RESPONSE TO BYRON REVIEW CONSULTATION   (dated 30/11/07)
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"We aim to provide children with challenging, educative, enjoyable and interesting content to help them make sense of the world in which they live. But, at the same time, we must safeguard the welfare of children and young people both as contributors and consumers of content"

Section 9 – BBC Online Services Guidelines

1. Introduction

The Byron Review has asked the BBC specifically to provide details of how the BBC protects children and young people online from potentially harmful and offensive content. So, in submitting this evidence, we have concentrated mainly on

- the aspects of connectivity that we feel pose the most threat to the safety and well being of these audiences as they grow up,

    and

- on what the BBC does to minimise those risks.

We support the Byron Review's belief in the importance of adopting an evidence-based approach to policy making. However, we have not attempted to respond to the full range of attitudinal or behavioural questions posed by the consultation paper as we feel these are best answered by academic or quantitative research. Where we have relevant, specific information, we have referred to it.

We do feature online games on our sites but we apply the BBC Editorial Guidelines to online games as we do to any other online content (text, audio or video). We have therefore treated games as a subset of our internet response. Similarly, at the end of this document we make a brief mention of our mobile activities and how the BBC is responding to security issues involved.

This paper is written from the point of view of the BBC public service although the same principles normally apply to BBC Worldwide

2. Outline of our services

The BBC has a very clear strategy of supporting children from birth through to early adulthood, with three sites that reflect the varying levels of protection, computer literacy, independence and maturity as they grow up, as well as specific educational services offered by BBC Learning.

1. The CBeebies (www.bbc.co.uk/cbeebies) and CBBC (www.bbc.co.uk/cbbc) websites enable children and their parents or carers to interact with us and each other in a safe, trusted and accessible environment. The sites provide high quality, engaging and relevant interactive content and experiences for children, as well as acting as a springboard to the best appropriate external websites for the under-12s.

2. The focus is on empowering children and giving them the opportunity to gain a deeper relationship with the BBC, the brands and characters, increasing the value they receive, the ownership they feel, and the impact they have on CBeebies and CBBC. To achieve this, the sites offer a range of innovative interactive tools and creative opportunities aimed at all British children, of every ability and background, giving them the space to publish their own content, thoughts and opinions. We also provide a dedicated 24/7 news service for children online as part of Newsround and through the PressPack section we can actively engage children in the topical issues that matter to them.

3. BBC Switch provides an online space for all teenagers, with content aimed at engaging young people, addressing their interests, and encouraging interaction. The site contains both supporting TV and radio programmes and free-standing content. (www.bbc.co.uk/switch)

4. BBC Learning provides output for school-aged children across a broad range of subjects and skills. The following are linked to curriculum or specific skills.
   Bitesize – revision and recap service for all major subjects for children aged 5-16 (www.bbc.co.uk/schools/ks3bitesize)
   Blast – creative development for teenagers, currently focused on creative arts, including partnership with youth arts organisations (www.bbc.co.uk/blast)

   Some services are designed for use in the classroom; others are increasingly used directly by learners at home or at school, without the need for tutor mediation.

Whether designed for relaxation or to deliver specific learning outcomes, all our sites share a philosophy to empower and engage young people in line with the BBC's public purposes.

They have a dual role to;

a) build on the BBC's reputation as a strong public service media brand in the UK (on TV and radio) – providing deeper, stickier, enriched, and engaging experiences around our existing content – by harnessing the known benefits of interactive and on-demand functionality,

b) extend reach (and relevance) to an increasingly digitally aware audience who are spending more and more of their dedicated 'media time' on the web and other digital platforms.

All BBC online services are subject to the BBC Editorial Guidelines (http://www.bbc.co.uk/guidelines/editorialguidelines/edguide)
and the BBC Online Services Guidelines (http://www.bbc.co.uk/guidelines/editorialguidelines/onguide)

3. How and at what age we protect young people from inappropriate BBC material online.

The BBC divides its online audience into distinct age categories with different content rules.

Under 7s
7 to 12s
12 to 16s
16 to 18s
18s and over

The majority of content is designed to be appropriate for general family consumption, acceptable for all ages (although not necessarily targeted at a younger age range). Thus, a complex science documentary strand might be deemed acceptable for a minor, although not necessarily likely to appeal to them (complexity of language, explanation etc). To address this online, we have specific services designed for different audiences and we take account of the expectations of the likely audience.

Under 7s – Cbeebies online

This is a walled garden site designed for use by children with their parents or carers. All content is specifically targeted at the designated age range, and the only links off the site are from the Grown-ups support area to similar support sites, and to specifically approved third party sites maintained by the TV Independents responsible for the programmes. These are pre-vetted by BBC staff to conform to Editorial Guidelines.

In addition, users can link off to the main BBC homepages via our global navigation where all content is designed for family consumption unless otherwise stated.

7–12s – CBBC online

Similar to Cbeebies, CBBC is a walled garden site with links off only to specifically approved sites (See section 4). The only other permanent links are via the BBC global navigation (via the main homepages again), to Cbeebies and to Bitesize Primary which is aimed at the same age group.

12-16s – BBC Switch online
BBC Switch is our third age-specific offer which launched earlier this year to aggregate all the BBC online content currently targeted at a Teens audience. All material is checked to make sure it is age-appropriate and external links are pre-vetted. This service is not promoted to younger children on Cbeebies and CBBC.

BBC Learning (Schools,Blast & Bitesize)

These sites follow similar rules and are targeted at curriculum learning. All external links are vetted for their appropriateness.

Many of the games and other interactive offers like message boards on bbc.co.uk require an extra level of security based on our registration service (Single Sign On) which distinguishes access according to the user's age.

All sites also encourage an active understanding of the Internet and potential hazards for parents and children alike.

4. How we protect young people from post watershed BBC material in an on-demand world

The advent of video-on-demand on the web has brought new challenges. We can no longer simply rely on the TV transmission time of a programme to ring-fence material that is deemed unsuitable for children by using the 9pm Watershed and we have adapted our online services accordingly.

The BBC has led the way in considering how to provide parents with information to complement the Watershed when programmes are increasingly being consumed in an On Demand environment.

Our research indicates that parents want to know about the types of content that may cause concern (such as strong language or violence) rather than being presented with simple age ratings. Because of this, the BBC developed the 'G' for Guidance labelling system where a 'G' is displayed when a piece of content contains challenging material and the nature of the content is spelt out in text alongside the programme synopsis. The presence of the 'G' is used to trigger parental PIN control systems,if enabled, as outlined below

On the current BBC iPlayer, installation is restricted to those aged 16 and over. Users are also told about PIN protection during the registration process and have to make a decision about whether to enable it there and then. If they choose not to, they are told how they can enable it later. Where a programme carries guidance, the 'G' and text label are displayed at the point the user decides to download the content. At the point of viewing, the text label is also displayed and the user has to enter their PIN number, if enabled, before they can view the content. Anyone using the iPlayer without the correct PIN code receives an explanatory message that they don't have permission access to the 'G' rated content.

As we introduce streamed content to the iPlayer shortly, we will also display the 'G' and text label before content can be viewed. A PIN protection system will be available from launch which we will look to make more robust as streaming and downloading are integrated into one system.

The BBC's 'G' for Guidance system has also been adopted by ITV, Channel Four and FIVE for their On Demand offers.

We have worked closely with Ofcom and a number of broadcasters and platform providers to promote best practice on labelling and have been an active participant in the BSG Content Information Group. The BBC is also an associate member of the Association for Television on Demand (ATVOD), the self-regulatory body for On Demand services.

However, protecting children from harmful content is not just about the systems broadcasters and service providers can put in place. This is why the BBC plays an active role in the promotion of Media Literacy. Through our own work, and in partnership with Ofcom, the Council of Europe and the Industry Taskforce, we aim to ensure that parents and children are made aware of both the benefits

and potential dangers which new On Demand technologies can bring. (See also s.11)

The current iPlayer is not promoted on the BBC's children's services and in the near future we hope to release a junior version of the player, specifically designed for children and teens, which will block any material that is not appropriate for a family audience.

5. How we protect against inappropriate non-BBC material

All external content linked to via Cbeebies and CBBC is pre-approved by an editorial expert and put on a "green" list which can then be searched via our Search services.

Cbeebies specifically searches out content on the Cbeebies site and approved sub sites created by Independent producers supporting their own Cbeebies programming.

The CBBC Search tool is a more complex resource to help users find the best CBBC and Newsround content, as well as carefully selected sites from around the BBC and the wider web. All the sites must be editorially valuable and relevant to our 7-12 year old UK audience and must not:

- Carry, link to or advertise pornographic material or other sexually explicit material (unless it forms part of tailored sexual education for this audience group)
- Carry, link to or advertise explicit violence or content inciting violent behaviour (including online games and game reviews with fighting, shoot 'em ups or other use of weaponry)
- Incite anything illegal
- Include discrimination of any kind
- Promote poor health / poor eating
- Use unsuitable language
- Exist solely to sell products or services
- Promote gambling
- Restrict features to paying subscribers

We do not allow linking to any social networking sites from CBBC. If any external sites include message boards, they must be pre-moderated at all times. We never link to live chat rooms from BBC children's sites.

The CBBC search database is constantly checked with an automated tool which 'sweeps' all the sites in the database, looking for changes according to key words e.g. 'message boards' or 'chat room'. If such changes are detected, the site is flagged to a researcher, who checks the site again for suitability, and removes it from the database if necessary.

Similarly, BBC Switch operates a rigorous policy when it comes to protecting our users from inappropriate content online. Whilst Switch's presence on third party sites is a key part of our offer to teenagers, allowing Switch to reach out to an audience that may not always be very familiar with the BBC offer, all our ventures in this space are fully moderated and carefully monitored. We include prominent links to features about online safety wherever possible and never link to live chat rooms from Switch.

6. How we protect against inappropriate User Generated Content

To ensure that inappropriate content isn't published on the CBBC message boards, we have a number of procedures in place. These are;

a) **Automatic filter** – inappropriate words are blocked from user names and messages at the point of posting. This filter includes swearing, sexual terms and racist or homophobic language. Non-CBBC or Newsround urls are also blocked, along with email addresses.

b) **Pre-moderation** – all our message boards are pre-moderated by a team of specialised children's moderators against the published House Rules. Each message is checked before it is published, and moderators will also spot and flag suspicious users, as well as users in distress.

c) **Hosting** – In addition to the moderation team, there is a team of four community hosts. The hosts manage the message boards from the public facing side, and are the first point of contact for the moderators when they have concerns about a user.

All CBBC and Newsround moderation is performed by an office-based team of advanced CRB checked staff from a single external agency.

- Working from home is not permitted in order to ensure that nobody else has access to children's information.
- Moderation is team-based so that moderators are able to share concerns about posts or users, and build up their knowledge of users' behaviour as a group.
- Moderation is performed to our strict moderation guidelines, built up over the last 7 years.
- Moderators work from 9am to 9pm, and message boards are only open within those hours. Therefore, when the boards are open for posting, there is always a moderator on duty.

However, this is a very labour-intensive process and the more popular and successful the community, the more resources it takes to moderate.
The ultimate sanction is to block those who persistently disregard the published House Rules but in the future we want to move towards a more "trust and "reputation" based system so as to harness good behaviour and enable peers to teach best practice to each other, by example. Those who are key and

central to the community would be rewarded for their good behaviour and disruptive members would have privileges removed. For BBC Switch, all submitted user generated content is pre-moderated before it can go live - although Switch also plans to move towards a more "trust and reputation" based system.

Exclusive pre-moderated public chat sessions with, for example, children's favourite authors and presenters are an incentive we already use for the target age group to participate in the CBBC communities. Offering these exclusive events and other premium content discourages users from lying about their age and registering for services aimed at older users.

Increasingly, we are encouraging our users to send us photos and videos as well as text. All these are pre-checked to make sure that the material is suitable for publication on CBBC and to check that children do not publish sensitive personal information about themselves or others eg. school signs, road names, door numbers which could put them at risk, for example through 'jigsaw id'.

In particular, when videos are submitted we normally require the telephone number of a guardian or parent, to get formal adult consent before publication. (This is in line with our TV policies and protects for example against children being traced by estranged parents who may have court orders against them).

7. Data protection and CRB clearance for all those with access to minors and/or their details

The BBC's approach to data protection is based on the principle of ensuring that the child is protected, their data is protected, but that the burden of parental approval is relevant to the level of risk to the child.

The Data Protection Act 1998 does not differentiate by age. All organisations are therefore forced to rely on contract law, which means that in theory no one under the age of 18 can supply any personal data, or agree to a website's terms and conditions without parental consent. If this was taken to its logical extreme, we would need express parental validation before allowing a child (under 18) to register for any BBC service. The BBC therefore takes a pragmatic approach ensuring that the level of parental approval is both legally justifiable and appropriate to the child and its involvement with the BBC.

The BBC Data Protection approval system is based on two principles:

- Children under 16 must obtain a parent or guardian's permission before sending the BBC any personal details.
- Verification of parental consent depends on the level of a child's involvement with the BBC. (4 levels, from very low level to high level)

For a very low level of interaction, for example playing a game online using a BBC registration system that does not hold any personal data, we will only require a check box stating that the child has the parent's approval. Whereas for a high level interaction, for example an appearance by a child on a TV programme, explicit verified parental consent on a variety of forms is required.

The BBC is presently engaged in a range of trials to review the use of parental consent by email, and by a registration system that would allow parents to decide what activities their children could engage in on BBC websites and what level of reporting they would receive. The BBC is also reviewing what rules should apply for teenagers up to 16, and whether they should have access to greater levels of interaction before they need to ask for parental consent.

Children's data is always regarded as sensitive and is treated as the highest priority in information security terms. It is never supplied to third parties without consent and is not used for commercial marketing purposes. The BBC's privacy policy applies to all children's sites, although they sometimes add additional terms and conditions in order to increase specific provisions or to highlight key issues.

For all children's services, we also insist that anyone with access to personal data is pre-cleared with the Criminal Records Bureau.

The BBC will only contact children:

- In relation to the functioning of a service to which they have signed up, to ensure effective delivery
- Where they have opted to receive further correspondence
- In relation to any contribution they have made to bbc.co.uk, e.g. on the BBC message boards;
- To invite them to participate in surveys about BBC services (participation is always voluntary and involves parental permission);
- and for BBC promotional purposes (e.g. programme alerts and newsletters) where they have specifically agreed to this.

All staff at BBC Children's and BBC Switch who would initiate such contact are again pre-checked for CRB clearance.

8. Online bullying/ peer to peer pressures

The automatic word filter and the pre-moderation of all user content before it can be published offer significant protection against online bullying. However, our hosts (see s.6 above) also play an important role in the prevention of cyber bullying in the CBBC communities. They are alert to signs of bullying behaviour, and work to ensure that the communities are welcoming and inclusive,

discouraging exclusive clubs and cliques. It can sometimes be difficult to spot a subtle pattern of bullying when looking at individual messages, out of context, in the moderation system, as the moderators do. So it is the hosts who play a vital part in being across all the various discussions and consequently being able to identify troublemakers as well as users who are in danger of being isolated.

We also encourage our audiences to make sure they are open and honest with their parents or guardians when communicating online. We reinforce our advice to children with the following information as part of our media literacy support:

"Make sure a parent, teacher or guardian knows when you're surfing the net.
If you get an e-mail with rude or unpleasant things, you MUST tell a responsible adult straight away and DON'T reply to it!
Remember that it's not your fault that someone has sent you this."

9. Stranger Danger

By keeping our message boards restricted by age, reverting to limited text functionality in games where moderation isn't available and keeping our moderators aware of the latest grooming techniques, we aim to minimise the potential for grooming online.

However, we believe there are a number of ways we can improve upon this with greater industry collaboration.

Age verification

When children sign up to the message boards, they are asked to provide their correct date of birth. They are not able to change this at a later date. As there is no accessible national database we can use to check identity and age against, we are unable to confirm these ages, but we do all we can to keep the boards safe and age relevant.

One way we do this is to ensure the communities are very much aimed at the target age (7 -12) thus putting off older users, who will find more engaging content and conversation for their age range in other BBC communities. Our strict rules regarding the publication of personal information ensure that it would be extremely difficult for an adult masquerading as a child to access the personal details of other users on the site. We block any attempts to swap direct contact information or suggestions to redirect online conversations to sites with less stringent security measures and we constantly monitor for other behaviours associated with online grooming.

In some cases we also add a maximum age for entry, based on the Single Sign On registration data.

However, in spite of all these measures, the BBC would welcome a pan-industry initiative to explore the feasibility of developing an age verification system that could "talk" to a secure and reliable database containing relevant children's personal information.

Parental Consent

When creating a user account, children are advised to ask their parents' permission, and make sure that their parents are aware that they will be using the message boards. The terms of use also make it clear that children should have a parent or guardian's permission before using the message boards.

If a child posts a message which suggests that their parents don't know or don't want them to use our communities, we will message the user making it clear that they must have parental/guardian permission to use the message boards.

Some organisations require parental verification by return email for added security. However, our own user testing suggests that many children share their parents' email addresses which would undermine the efficacy of the system, and that a proportion of our audience only access CBBC through after school clubs, either because they don't get that support at home or because they don't have access to the Internet.

Therefore, a tick-box solution or email verification is not sufficient to acknowledge that an informed parent / guardian / teacher is actually monitoring the child's activities and doesn't help children who fall the wrong side of the digital divide.

We would again welcome some pan-industry exploration into more robust parental consent procedures that are socially inclusive and not open to abuse.

10. Our duty of care to children and young people who confide in us about problems and/or abuse in the real world

Occasionally, we do receive messages from children in distress. Our team of trained moderators read every message before it is published. They refer any messages which ask for help, or which hint at a situation where the child may be at risk, to the CBBC staff Community Team.

Such situations include: extreme bullying, eating disorders, self harm, domestic violence, depression, sexual or physical abuse or potential grooming.

When a child posts a message directly asking for help, or is troubled, a BBC staff host will post a reply using one of a list of 'distress responses', which cover scenarios ranging from having an eating disorder to domestic violence.

These responses have been developed with leading children's charities such as ChildLine and Childnet International and were revised with the help of trained counsellors. We also work closely with a children's psychologist and counsellor who gives public (and, where necessary, private) in-depth help to children who need it.

The host response will typically urge the child to talk to an adult they know and trust (parent, teacher) and offer them helplines such as ChildLine ,Young Mind, the NSPCC or Samaritans in case there is nobody they feel they can talk to. If the content of the message is graphic or particularly distressing, it won't be published.

We also provide a number of direct links for children to self-report to different agencies. These are also searchable under the CBBC search system. They include a link to CEOP for children who may wish to report criminal abuse or grooming direct, rather than using our single integrated "complain about this post" system.

We also assess whether the child would appear to be in **immediate danger or serious distress.** In the majority of cases, this is not the case but if a message is more serious, we follow the escalation / referral procedure described in s.13 below.

BBC Switch also follows a clearly defined escalation policy, the team pre-moderate all comments before publication and they refer any worrying ones up. Switch uses "distress response" emails which are adapted from CBBC ones. Switch also believes in defining expectations about what level of response a distressed teen can expect from the team and makes it clear that not every email can be published. The site offers direct links to dedicated resources such as Samaritans and ChildLine.

11. Media literacy skills (specifically regarding potential dangers online)

CBBC has a media literacy section called Stay Safe, presented by an animated cartoon rabbit called Dongle. Research has shown that children of primary school age respond very well to the character. The section includes an interactive quiz, a 'pop video', and links to other resources such as 'thinkuknow'. The material covers online and mobile safety, and the content is built around the Stay Safe smart rules:

S = Keep Safe
M = Don't Meet Up
A = Accepting emails can be dangerous
R = Reliable? People may not be who they say they are.
T = Tell an adult if you feel scared or uncomfortable

The Stay Safe section is linked to from all the community pages, and these messages are reinforced by the hosts as they encourage the right sort of behaviour from users. But it is important to note that although the SMART rules are widely used and recognised, several different versions of it are being used across the industry, which is likely to confuse some children.

12. The BBC's integrated complaints system

Through audience testing, we have found that the best approach is to provide one single complaints system, as children seldom distinguish between criminal abuse, bullying or simple differences of opinion. Our trained staff then route messages as appropriate according to our referrals process below.

We are cautious about adding external complaint functions to this trusted " One-Stop-Shop" system as this may create more confusion for our audience (for example, which button do they press?), encourage misuse if directly routed to the police, or risk overloading police and other agencies with a large number of queries which their services are not designed or equipped to deal with. We also tread a careful line between making children aware of the potential threats of the online world and seeing to it that younger children aren't overly intimidated by perceived threats that actually don't relate to the activities they're involved in.

We need to maintain our reputation as a safe environment but are aware from audience feedback that too many on-screen caveats can be off-putting and could potentially drive some users to less reputable, unregulated sites.

13. Our internal referrals procedures.

If we do receive a message from a user who requires further help, the following rapid referral procedure is followed, and a member of senior management is alerted on a formalised rota system.

The following are mandatory for instant referral

- If the user says they are going to kill themselves
- If they are reporting sexual abuse (online or real life) or physical abuse
- If they are going to run away
- If they have been left alone at home
- If they or a friend are going to meet someone from the Internet

Hosts can also escalate any other issue which poses an immediate danger or which they are unsure how to treat.

The senior manager then decides the next steps, including whether or not to refer the message to the NSPCC. (The hosts are able to contact the on-call senior manager at any time when the boards are open, between 9am and 9pm, 7 days a week).

In the meantime, the host will post the appropriate distress response, or the 'seek urgent help' response, as advised by their senior colleague.

When messages of concern relate to specific suspected criminal activities or behaviour, they are then referred on immediately to CEOP.

14. Computer games.

The BBC's public service activities in this sector are restricted to games downloaded from the Internet for free; single player online games and multiplayer games played on the Internet with others across the UK or internationally. In this paper, we do not refer to commercial games or franchises based on BBC brand licenses.

Our emphasis is on games which fulfill the BBC's public purposes to encourage creativity, self-expression, social confidence, exploration and learning. These games may have specific educational value relating to the curriculum or supporting key developmental themes according to the different age ranges. We also feel it is increasingly important that they should reflect the lives of British children in the global marketplace.

All our audience research and user testing suggest that children retain more information through direct interaction. For the younger age group, Cbeebies games can be used to encourage core dexterity and cognitive functions; on CBBC, role-playing enables them to ascertain boundaries in the real world. Increased connectivity can, if given specific purpose and direction, encourage greater collaboration and awareness of others.

Online communities are often at least partially self policing and actually encourage social inclusion among those who may feel disenfranchised in the

world of the playground. As well as supporting logic skills and empirical reasoning, we believe that, contrary to common perception, games do also encourage language and conversations skills either in-game or as part of playground chit-chat.

We also recognize specific societal benefits of role playing games – encouraging citizenship and establishing relevance of 'reputation' and appropriate behaviours within your community (eg. climate change games or "right vs wrong" games); as well as economic benefits in the online space with games such as Bamzooki which are actively encouraging core skills that are important for the UK knowledge economy.

In addition, we try not to encourage prolonged usage – much of our content is aimed at a casual gaming audience which is short form and episodic - and we often flag when kids should take screen breaks

Evidence is anecdotal, but from our message boards, parents' perception of risk is very mixed. In our experience, parents are less proficient and sometimes unnecessarily fearful about the risks. Feedback from parents also suggests they often divide up their child's screen-time between TV/ web/ games and that parents like to send their children to CBBC because it relieves them of the pressure of checking that all material is appropriate.
For Cbeebies parents, we offer a specific site alerting them to best ways to use the site as a developmental support.

BBC Switch uses quizzes, short form games and, increasingly, new narrative formats that provide a distinct approach to casual gaming - mixing high quality audio visual storytelling with interactive opportunities to solve puzzles, look for clues and to learn more about yourself.

As a matter of corporate policy, the BBC does not offer "shoot-em ups" or any games where children or teens can chat in private through the BBC systems.

15. Mobile Phones

The BBC is currently reviewing its editorial position in relation to mobile services for children but we believe mobiles to be an important tool for social inclusion in a digital world. Many families now have no fixed line telephone services at home and penetration of mobiles amongst our older audience can help us guarantee universal reach for our digital services.

However, we are acutely aware of the on-going debate about potential health risks of mobile telephony.

The 2000 Stewart report concluded that mobile phones did not appear to harm health, but recommended further research was carried out. In 2005, Sir William added that mobile phone use by children should be limited as a precaution - and that under eights should not use them at all.

Government guidance stresses that mobile phones should not be <u>over-used</u> by young children.

We therefore take the view that mobile services around the Cbeebies brand should be restricted to our Grown-ups service targeted at providing adult support and that, on CBBC, the emphasis should be on providing mobile content through other mechanisms (via Bluetooth or side-loading from our own website) in preference to wireless telephony transfer.

This is a precautionary approach and we welcome more detailed scientific research into potential or perceived health risks.

We also believe we may need to increase our audience awareness about children not putting themselves unnecessarily at risk from traffic accidents or street crime based on current national statistics.

Again we would welcome pan industry research about the best way to communicate these messages.

16. Additional Comments

Online child protection filters

The BBC recognizes that online parental controls and filters can provide valuable protection for children against harmful and offensive content. The BBC's own iPlayer system offers PIN protection for video downloads so that parents can control their children's online access to challenging content.(See s. 4 above)

But there appears to be a significant issue with over-blocking. This not only limits freedom of expression and restricts older children's ability to study online. It is also a safety issue. One operator of online parental controls has reported that over-blocking was the number one reason why parents turned off their parental controls. Another has acknowledged that their filter products sometimes block access to the BBC's own site for children, CBBC.

In order to stimulate a reduction in over-blocking and a possible increase in use of parental controls, the BBC hopes that the proposed BSI kite mark standard

for online parental controls will require demonstrably low levels of over-blocking before an award is made and that reputable children's sites like CBBC will be an essential part of the testing process.

Self regulation and legislation

The BBC is a long-standing, active and committed member of the Home Office Task Force on Child Protection on the Internet.

Over the last six years, the Task Force has produced a range of Good Practice Guidance for example on Chat, IM, web-based services, Search and Moderation. The guidance relies on the knowledge of experts from the children's charities, law enforcement, industry, government, regulators and others. (While the core guidance is aimed at reducing the risk of illegal behaviour, some areas also cover harmful and offensive content)

The BBC greatly values the Government's continuing support for the Home Office Task Force and the self-regulatory principles it embodies. In this area of rapid technological development, where timely and flexible responses are likely to be most effective, we believe that the voluntary collaborative approach, where service providers take into account the particular nature of their own services, has delivered real benefits. This is in part because the collaborative process itself encourages providers to share their own methods and practices with each other and with the relevant group as a whole, which often acts as a stimulus for robust debate, for self-examination and for improvement before the guidance is formally published.

However, we believe that there may be room for more work on how the Good Practice Guidance is publicised and in the evaluation of its practical effects.