



THE NEXT CLICK

MOVING TOWARDS A BETTER AND SAFER
ONLINE ENVIRONMENT FOR EVERY CHILD

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1 FOREWORD

The global character of the internet means purely national approaches to tackling its many challenges are unlikely to succeed. The European Union (EU), on the other hand, is big enough and powerful enough to be a serious player. The EU can command the attention of all the major actors and this fits well with its key leadership role in several different aspects of global affairs.

The European NGO Alliance for Child Safety Online (eNACSO) is a network dedicated to making the internet and associated technologies safer for children and young people. eNACSO promotes and supports actions at national, European and international level. Our work is based on the 1989 UN Convention on the Rights of the Child and its Optional Protocol on the sale of children, child prostitution and child pornography².

eNACSO's members are leading children's rights and child protection NGOs from across the European Union. We also work increasingly closely with children's rights NGOs in countries outside the EU and Europe.

The Next Click details eNACSO's recommendations to the EU, industry, international organisations and other stakeholders on how to create a better and safer online environment for children and young people. While the language of this document is written very much with international institutions and forums in mind it is hoped nonetheless that it may also be of interest to people working on online child protection issues at a national level.

The project is co-funded by the European Union, through the Safer Internet Programme
ec.europa.eu/saferinternet

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What we can all do to make sure children are safe online

- 👉 Empower children to become strong, resilient engaged digital citizens
- 👉 Combat the rise in online child abuse
- 👉 Combat child abuse images
- 👉 Make social networking sites safer for every child
- 👉 Protect children against online commercial exploitation and invasions of privacy
- 👉 Support NGOs to participate in policy making decisions about online safety

¹ www.unhchr.ch/html/menu3/b/k2crc.htm

² Throughout this document the term "child abuse images" is used rather than "child pornography" because this more accurately reflects the nature of the content.

2 EXECUTIVE SUMMARY

The internet's ability to provide a platform for learning, creativity, connectivity and games is at the heart of its value and its attraction to the hundreds of millions of children and young people worldwide who use it daily.

The internet and the still growing number of devices which can connect to it are also providing children and young people with immensely valuable new tools which can be used both to express or assert their views and to claim their rights.

In short when thinking about policy in this space it is important to give pride of place to the upbeat and creative dimensions of the digital revolution and shake off the idea that the internet is solely or even principally a place of danger where children and young people go in constant peril.

Furthermore we all need to stop talking and thinking about the internet and children's and young people's use of it as if it were a cordoned off or separate part of their lives, easily distinguishable from "real life" where wholly different rules or standards apply. For children and young people the internet and the devices they use to connect to it are very much part of their real lives. Things that happen at school are quickly replayed and developed online. Things that happen online are quickly replayed and developed at school.

This has important implications for policy. Social workers, teachers, law enforcement officials, indeed anyone working with children in a professional capacity, whether on a paid or voluntary basis, really has to have some level of understanding of the technology and how children and young people use it. Without that understanding they are, in effect, cut off from important aspects of children's and young

people's lives. And if this is true for professional working with children it is even more the case for their parents and carers.

However, having emphasized and being ever mindful of the positive aspects of the new technologies, there is at the same time no getting away from the fact that the internet has also brought with it a number of unwanted consequences. Some of these can put children and young people at risk of significant harm, for example new types of bullying and new forms of sexual solicitation of children and young people have been facilitated by the internet. The number of child abuse images in circulation has hugely increased. Interpol and national law enforcement agencies are understood to hold over 1 million unique images of child abuse involving tens of thousands of different children.

On 17 December 2011 a new Directive came into force in the European Union on combating the sexual abuse, sexual exploitation of children and child pornography. It is a major step forward by the EU and establishes a common framework for child protection across all Member States. Each Member State has up to two years to transpose the terms of the new Directive into their national law. Monitoring progress, not just on the legal dimensions represented by the transposition processes, but also the implementation of the policies which lie behind them will be a major task for eNACSO in the period immediately ahead.

As several different Directorates within the Commission become more deeply engaged with the online child safety agenda there will be a need to keep under review the high level internal arrangements for ensuring the smooth co-ordination of policy development and its implementation.

3 CHILDREN, YOUNG PEOPLE AND THE INTERNET: AN OVERVIEW

The internet³ has become vital to the modern world. eNACSO strongly believes in the potential of the internet to enrich and empower children and young people in many different ways. That's why eNACSO actively promotes safe and equal access to the benefits of the internet for all children and young people everywhere.

3.1 A positive force in the world

When we talk to children and young people about the internet and the new technologies it is essential to maintain an upbeat and positive attitude. We should aim to empower children and young people, helping them to become resilient, have a realistic understanding of the internet's hazards and know how to deal with them.

3.2 Striking the right balance

Parents and educators need to know how to strike the right balance between being realistic about the risks which exist online but not exaggerating them thereby perhaps discouraging children and young people from using the technology at all. That would be a great loss to the children and young people as individuals, as well as to society as a whole.

3.3 Virtual and real worlds becoming more closely aligned

As children and young people increasingly live out significant parts of their lives with and through the new technologies, the nature of the risks they take online have become inextricably entangled with wider aspects of their behaviour.

It is now simply no longer possible, if it ever was, to draw neat lines between so called "internet issues" and "real world" problems. This has important implications both for parents and for those professionally engaged in working with children.

Having said that, the internet certainly does have the potential to compound and even magnify existing individual vulnerabilities of particular children and young people, thereby adding to adversities they may face in the real world.

3.4 An interactive and immersive world

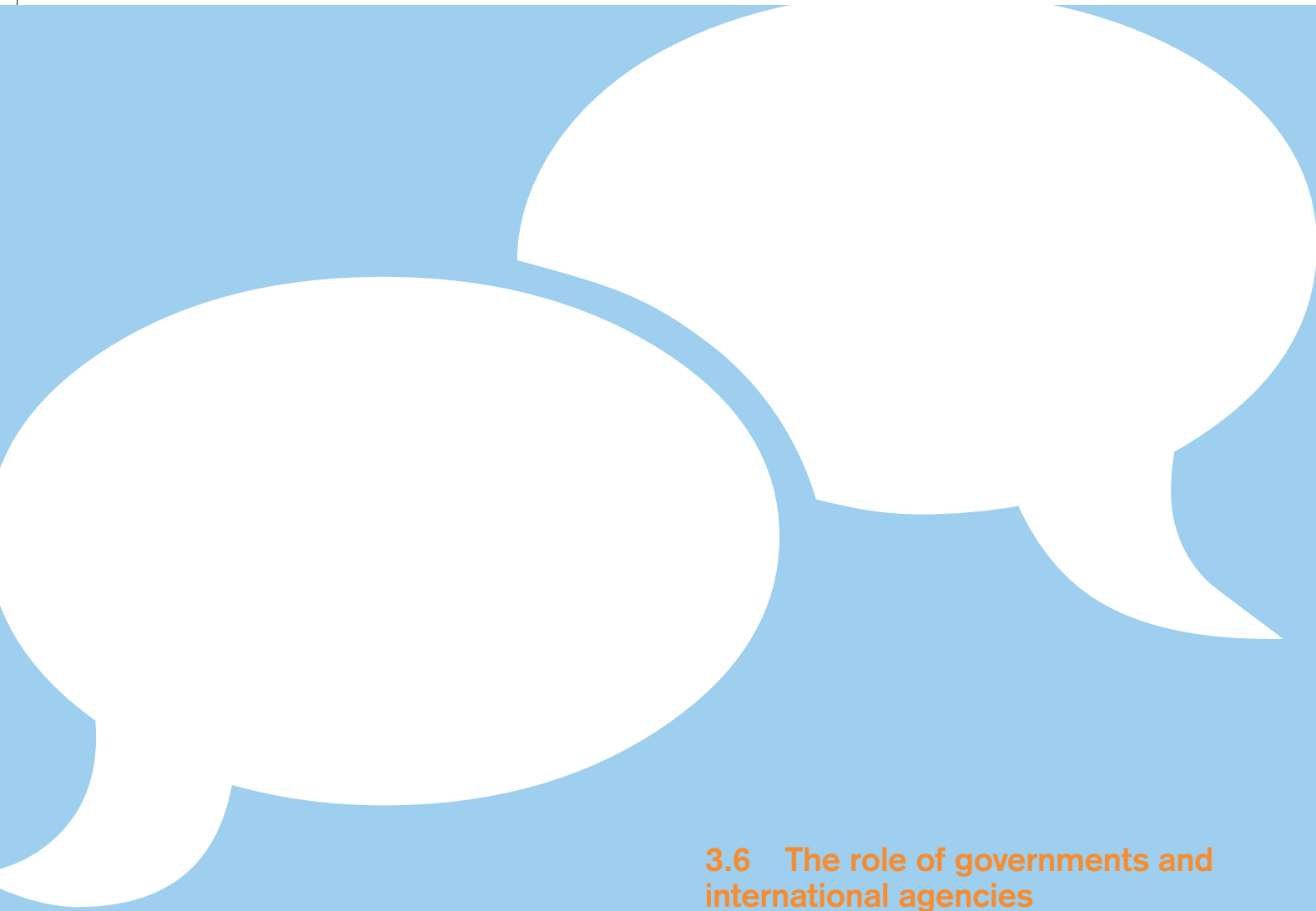
Modern interactive technologies, particularly in the field of gaming, can be incredibly immersive, providing highly absorbing environments. These can help develop a wide range of problem-solving skills but these qualities have also created a new range of concerns, particularly in relation to so-called "addiction" or over-use. This can become an obstacle to the development of a range of interpersonal skills, or to developing a healthy lifestyle, for example through taking exercise or engaging in sports.

3.5 Digital divide?

The United Nations Convention on the Rights of the Child (Article 12), requires that "States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child."

³ There are many ways the internet can be accessed, eg via tablet, laptop, desktop, notebook-sized or handheld computers, through mobile phones, games consoles, personal digital assistants and TV. Rather than repeat this list throughout this document, unless the text provides otherwise, all of these mechanisms may be relevant.

⁴ Drawing conclusions from new media research: reflections and puzzles regarding children's experience of the internet, LSE, 2006



The internet can provide an enormously enriching environment for very many users, particularly younger users, but unless all children and young people have access it could also be contributing to a further widening of pre-existing divisions in society or maybe even be responsible for opening up new ones. Such a divide might be rooted not simply in possessing, or not possessing, the physical means of accessing the internet.

Professor Sonia Livingstone's research into children and young people's activities online established⁴ that an individual's level of media literacy and self-confidence in using the internet will be decisive in determining whether or to what extent that individual benefits from it. For these reasons, in developing policies to address the digital divide, it is imperative that media literacy initiatives go hand in hand with efforts to widen the availability of the physical means of access.

3.6 The role of governments and international agencies

Clearly national governments have the prime responsibility to act to protect all children and young people within their jurisdiction. However, the internet is a global medium. This places a particular onus on international institutions to lead and encourage action at national and international level.

The EU⁵ has been a pioneer in this field. Its annual "Safer Internet Day" in effect has gone global, providing a very valuable focus for education and awareness activities in every major language across all five continents.

Through its Child Online Protection initiative the International Telecommunication Union, part of the United Nations,⁶ is now also spearheading a very important worldwide initiative that continues to gather momentum. Perhaps most importantly, international institutions such as the ITU and the EU are best placed to help countries that are just beginning to grapple with the challenges of online child safety. We can all learn from the experience of others.



⁵ <http://tiny.cc/eusip19>

⁶ <http://tiny.cc/itucop>



Schools have a pivotal supporting role to play here. NGOs are also key but they may need some assistance to help develop their capacity to contribute. Partnerships with law enforcement are also vital to ensure appropriate messaging is developed and properly integrated into wider education and awareness measures.

Industry is uniquely placed to make a contribution in two ways: first, by helping all stakeholders to produce and promote effective education and awareness resources as well as producing materials themselves which speak to their own customer base and markets. Secondly, by developing and promoting more and better technical solutions which underpin and reinforce the safety messages.

Against this background eNACSO was delighted to welcome the initiative started by several major high tech companies to develop an overarching set of principles reflecting their commitment to establishing a new self-regulatory framework for the internet within the EU. This initiative culminated in the announcement in February, 2012, of the ICT Principles Coalition.

New machinery is being defined and refined to take this initiative forward. eNACSO is pleased that the Secretariat, along with several key network members, were able to help shape this outcome.

In addition on 1st December, 2011, Commissioner Neelie Kroes unveiled a major pan-EU programme on online child safety. Entitled the "Coalition to make the internet a better place for kids" its tasks and objectives are very specific. The initiative is meant to be completed within 18 months of launch. Again eNACSO is pleased to be playing a part within the multi-stakeholder groups that are taking the work forward. The Kroes Coalition is focusing on five clear objectives:

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3.7 A multi stakeholder approach is essential



The internet and IT sector generally is characterised by constant and fast-moving innovations. These developments need to be matched by evolving policies that promote the permanent, facilitation and support for children and young people's participation in the online world while always bearing in mind the need for proper and proportionate safety and measures.

No single agency or interest, public or private, no company or other organisation has a monopoly of knowledge or expertise in the field of online safety. Providing a safe environment for children and young people on the internet is a shared responsibility.

Children and young people need to be equipped to keep themselves safe online. Parents, guardians and teachers need to be helped to understand how children and young people use the new technologies so they, in turn, can help ensure children and young people get the most out of them and know how to use them safely.

Simple and robust reporting tools easy-to-find and recognisable features on all devices to enable effective reporting and responses to content and contacts that seem harmful to kids

Age-appropriate privacy settings settings which take account of the needs of different age groups

Wider use of content classification to develop a generally valid approach to age-rating, which could be used across sectors and provide parents with understandable age categories

Wider availability and use of parental control user-friendly tools actively promoted to achieve the widest possible take-up

Effective takedown of child abuse material to improve cooperation with law enforcement and hotlines, to take proactive steps to remove child sexual abuse material from the internet



4 CHILDREN'S VULNERABILITIES

As children's rights and child protection organisations, the principle that children and young people are more vulnerable is core to our perspective and our work on internet safety. It is also embedded in a range of child protection, child welfare policies and legislation in many different countries in all parts of the world.

In relation to the internet there are a number of issues about children and young people's vulnerabilities that are of ongoing concern. These may be summarised as follows:

4.1 Content

1. The internet's ability to provide the means to expose children and young people to legal but age-inappropriate material eg adult pornography or very violent imagery.
2. The internet's ability to provide the means to expose children and young people to different kinds of illegal content eg child abuse images.

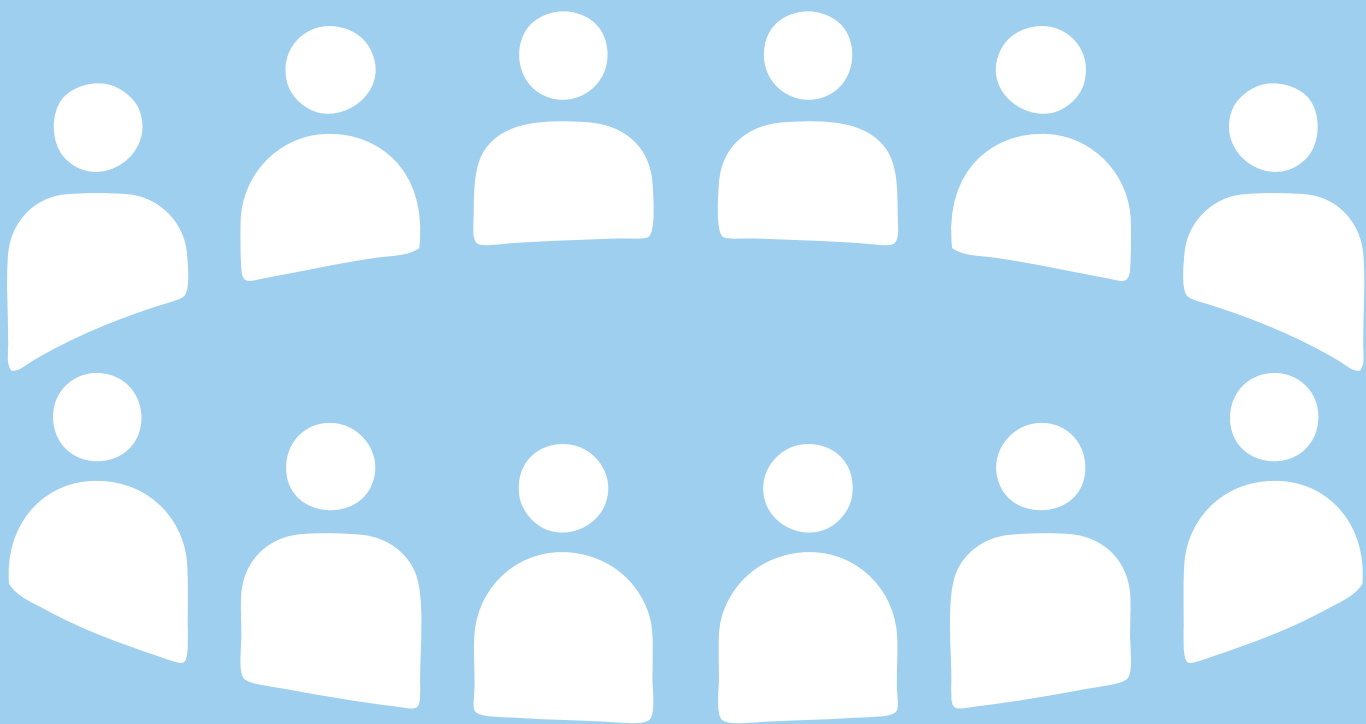
4.2 Contact

3. The internet's ability to provide the means to expose children and young people to bullying or exploitative behaviour or sexual solicitations from adults or other minors, or both.
4. The internet's ability to provide the means to expose children and young people to harmful online communities such as sites which encourage anorexia, self-harm, suicide, violence, hate and political extremism.

4.3 Conduct

5. The internet's ability to facilitate and promote risky sexual interactions between children and young people, including encouraging them to take and post pictures of themselves or others ("sexting") which, aside from being potentially harmful, typically might also be considered to be illegal.
6. The internet's ability to facilitate or encourage children to place in the public domain information about themselves, or post pictures or videos or texts that compromise their personal safety or jeopardize future career options. The development of location aware services and the emergence of a range of mobile apps which have been subjected to scant quality control are markedly increasing these risks.
7. The internet's ability to expose children and young people to bullying can also promote an environment in which children and young people are encouraged to bully others.





4.4 Commerce

8. The internet's ability to enable children to access or acquire legally restricted goods and services.
9. The internet's ability to enable children to access or acquire age-inappropriate goods and services.
10. The internet's ability to expose children and young people to age inappropriate advertising, scams, identity theft, fraud and similar threats that are economic in nature.
11. The internet's ability to compromise a child or young person's personal safety through inadequate, unclear or unenforceable data protection or privacy laws.

4.5 Addiction

12. The internet's ability to facilitate access to games which can be played over it, or to create alternative environments, where these seem to have encouraged forms of obsessive behaviour or excessive use which may be having a bad effect on their health or social skills, or both.

4.6 Societal

13. To exacerbate or entrench social divisions within a society between the digital haves and the digital have nots.
14. At a macro level a digital divide between nations or regions similarly may entrench or widen existing global patterns of disadvantage.

5 KEY RECOMMENDATIONS

12 5.1 The new Directive and institutional matters

1. The new Directive on combating the sexual abuse, sexual exploitation of children and child pornography, has to be transposed into national law by all Member States by December 2013.
2. The Commission should make an early statement about how it will ensure the Directive will be fully implemented, both generally and specifically in relation to the steps taken by Member States to combat the distribution of online child abuse images.
3. In 2006 the Commission recommended that children's rights should be 'mainstreamed' across all EU policies. Yet initiatives still emerge from the Commission where it is quite apparent that the teams responsible for drafting them have not considered the impact on child safety or child welfare in relation to the whole or parts of the proposals they are making.
4. The establishment of the new Commissioner for Fundamental Rights, with cross-departmental responsibilities, provides a good opportunity to review existing working methods. The existing machinery for co-ordinating policy development across Directorates needs to be enhanced so it is able to intervene in the policy-making process authoritatively and in a timely manner. Although the Child Rights Unit in DG JUSTICE has been strengthened, the Inter-Service Group on Children's Rights has not met systematically. It also not clear what mechanisms exist for encouraging co-operation at Commissioner level over children's rights issues
5. The Commission needs to enhance its capacity and expertise on children's rights and how it relates to the online arena. The relevant directorates within the Commission would benefit from appointing dedicated experts – if necessary from outside the Commission – to strengthen and provide a deeper understanding of children's rights. Such expertise should also be made available to other EU institutions.

5.2 Ensure the right to participation for every child

1. Governments should encourage public awareness debates and campaigns to promote a positive cultural climate towards children and young people's participation in all matters that relate to them and their lives.
2. Governments should also provide more political and financial support to e-participation processes for young people, working to increase media literacy, reducing the digital divide, and providing a safer ICT environment. To this end the use of new media and new forms of participation should become an integral part of formal and informal education.
3. It is important to promote greater awareness of Article 12 of the UN Convention, and to develop training modules demonstrating its application in practice for all professionals working with and for children and young people, including NGO staff, ICT industry representatives, lawyers, judges, police, social workers, community workers, psychologists, care givers, teachers at all levels of the educational system, doctors, nurses and other health professionals.

5.3 The need to develop a comprehensive children's rights strategy

1. The EU and national governments should develop a comprehensive and mutually supportive approach to child safety on the internet ensuring that it is fully integrated into a wider children's rights strategy. In that regard the Commission's Communication of May 2012, entitled a "Strategy for a Better Internet for Children" statement is most welcome. In developing the policies to underpin the strategy it will be essential to draw on the expertise and knowledge of all the stakeholders.

2. It is particularly important to produce education and awareness programmes which reach out directly to children and young people. Law enforcement needs to find appropriate ways to integrate their messaging into these programmes.
3. It is essential to find ways to help parents and teachers to understand the new technologies and how children and young people use them so that they, in turn, can provide help, advice or support.
4. Hi-tech companies have a particular role to play in helping all stakeholders to develop and promote effective educational resources as well as developing materials for use with their own customer base and markets.
5. Hi-tech companies also have a unique role to play in terms of developing technical solutions which can contribute to online child safety.
6. In developing any new products and services hi-tech companies should always take child safety fully into account.



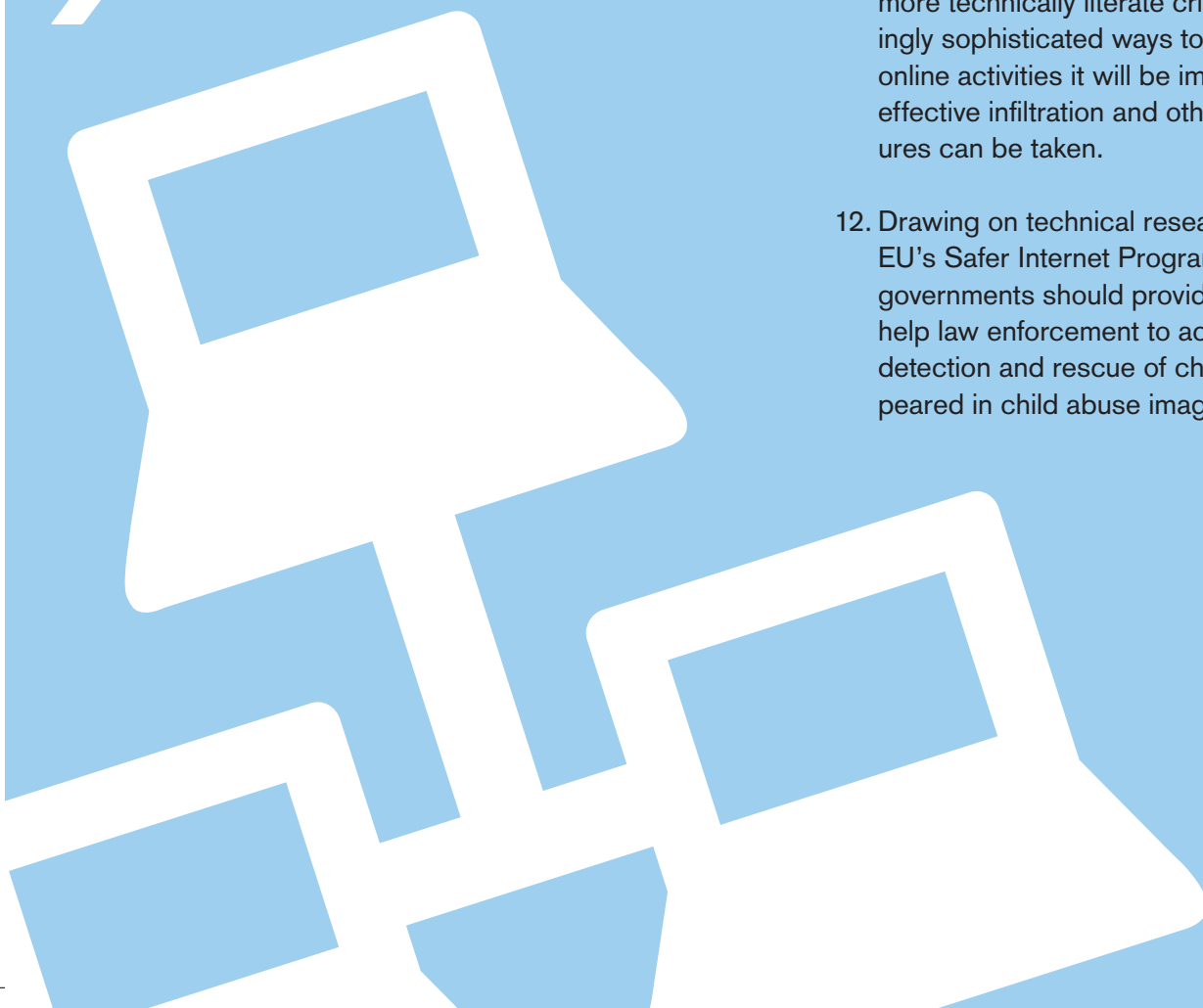



5.4 Encourage international leadership

7. The global nature of the internet places a particular responsibility on international institutions to lead and encourage action at national and international level.
8. Intergovernmental and regionally based initiatives such as the ITU's Child Online Protection initiative and the EU's Safer Internet Programme play a vital role in pushing forward the agenda. When the Safer Internet Programme comes to an end in 2013 to be replaced by "Connecting Europe" it will be important to find ways to sustain the impetus of the EU's pioneering work. International institutions are very well placed to help those countries just beginning to grapple with the challenges of online child safety.

5.5 Combat the spread of online child abuse and child abuse images

9. Laws made before the arrival of the internet may need to be modified to ensure they do not create barriers to the proper safeguarding of children online i.e. modern laws should recognise that a range of sexual offences against children and young people can be committed in environments such as the internet.
10. There is an urgent need to achieve a much greater degree of harmonization of police procedures for collecting, preserving and presenting evidence of online offences against children.
11. Governments should ensure that adequate resources and leading edge technical tools are available to law enforcement agencies charged with dealing with child abuse images and other online offences against children. In particular, as more technically literate criminals find increasingly sophisticated ways to hide traces of their online activities it will be important to ensure that effective infiltration and other disruptive measures can be taken.
12. Drawing on technical research funded by the EU's Safer Internet Programme and others, governments should provide more resources to help law enforcement to achieve a higher rate of detection and rescue of children who have appeared in child abuse images on the internet





13. The recent announcement concerning the creation of a new European Cybercrime Centre as a division of Europol is a very encouraging development. Given the international nature of online offending against children the new Centre should be able to play a role, on a transnational basis, in strengthening national and local law enforcement's overall forensic and investigatory capabilities thereby assisting national and local police investigations particularly in respect of victim identification work.

14. Hotlines which receive reports about the addresses of child abuse images on the internet are essential. Every country should have a mechanism which meets the needs of all linguistic groups within its jurisdiction. The hotline should meet or exceed INHOPE's⁷ standards.

15. It is important that faster deletion times for illegal images are achieved within the EU. This may require law enforcement to be provided with additional resources. It is also important to find ways to encourage non-EU countries also to improve their deletion times.

16. Worldwide, international and intergovernmental bodies, national governments, police agencies and others should expedite the creation of a single list of all known child abuse web addresses (or a list that is as large as possible, drawing on any and all national lists that are not currently encumbered by local legal constraints) to promote the more efficient deletion, investigation, or blocking of online child abuse material. With appropriate security surrounding its deployment, this list should be made available to relevant online service providers, technology and filtering companies and others with an appropriate interest.

17. Worldwide, international and intergovernmental bodies, national governments, police agencies and others should expedite the creation of a single database of all known child abuse images (or a database that is as large as possible, drawing on any and all national databases that are not currently encumbered by local legal constraints) to promote the more efficient deletion, investigation, or blocking of online child abuse material. With appropriate security surrounding its deployment, this database should be available to relevant technology and filtering companies and others with an appropriate interest.

18. Governments, law enforcement and industry should begin discussions about how to combat the increasing use of peer-to-peer software for the distribution of child abuse images and how to combat the emergence of other types of closed groups or communities that have the same purpose.

19. The hi-tech industries should identify ways to prevent the misuse of encryption software and other anonymising technologies from facilitating the exchange of child abuse images.

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⁷ <http://www.inhope.org>



20. Representations should be made to the Internet Corporation for Assigned Names and Numbers (ICANN) with a view to securing a substantial improvement in the regulatory performance of those domain name registries that currently appear to be ineffective in preventing child abuse images from being published under their auspices.

21. ICANN should also be asked to give an undertaking that it will not permit any national or other registries to accept or allow domain names to be registered or maintained which advertise or promote the availability of child abuse images.

22. ICANN should be asked to ensure that throughout the domain name allocation and management system it is a requirement that the identity of everyone registering or owning a domain name is verified and authenticated both at the time of purchase and renewal. It is imperative that the accuracy of the WHOIS directory is substantially improved as a matter of urgency.

5.6 Support professionals and treatment programmes

23. The bodies responsible for the accreditation of police, health, social workers, youth workers, teachers, probation and prison staff, need to ensure that proper recognition is given within their professional qualifications and their professional development programmes to the importance of being able to recognise the manifestations of online abuse in victims, and be familiar with the kinds of abuse engaged in by perpetrators.

24. Governments should ensure that appropriate resources are developed to address the therapeutic needs of sexually abused children, including where images of that abuse have appeared on the internet.

25. Appropriate assessment and treatment programmes should be available for children displaying inappropriate or aggressive sexual behaviour online.


26. The relevant agencies need to ensure there is sufficient availability and take up of treatment programmes for internet offenders.

5.7 Create new advertising, e-commerce, privacy and data protection standards

27. Policies and standards need to be developed which protect children and young people from exposure to age inappropriate advertising and age inappropriate commercial activity.

28. The internet should not become a way for vendors to avoid or evade laws on the sale of age-restricted goods and services e.g. alcohol, tobacco, pornography, gambling and weapons.





29. Appropriate regulations should be developed to govern the online sale of age-restricted goods and services. In particular these regulations should guard against the possibility that differences between countries in legal restrictions in terms of the minimum age of the purchaser might encourage transnational trade to develop in ways which undermine local laws.

30. In particular if there is to be a new “28th jurisdiction” or common sales law for the EU it must recognize and take appropriate steps to counter the potential hazards associated with encouraging transnational sales of age restricted goods and services.

31. Adult products and services should not be advertised on websites which are primarily used by children and young people, or where substantial numbers of children and young people are known to be regular users. A clear definition of what constitutes a children’s website should be formulated and all advertising on such sites should conform to the equivalent or relevant real-world advertising standards. A mechanism may need to be established to resolve any disputes about whether or not a given site should be classified as a children’s site.

32. Regulators need to monitor the development of forms of online payment which are anonymous and could therefore facilitate the illegal purchase of age restricted goods and services, or could facilitate trade in other illegal items e.g. child abuse images.

33. In the context of the draft Data Privacy Directive currently being discussed by EU institutions eNACSO supports the idea of an EU-wide minimum age below which any company collecting data from a child must first obtain verifiable parental consent. However, the level at which that age should be set must be determined following appropriate research.

34. eNACSO does not support the draft’s current suggestion which, without any further explanation, suggests the EU should simply adopt the US standard of 13. That standard was adopted in the USA in the late 20th Century, for another purpose and before social networking sites existed. Moreover it is a standard which, on a very large scale, is not being observed within the USA. eNACSO can see little point or purpose in importing a system which would be ineffective in Europe as well.

35. It is very important that the new Data Privacy Directive does not erect any barriers to children and young people being able to access online advice or helpline services intended for their benefit. A child cannot be expected to ask permission from an abusive parent in order to obtain advice about how to deal with that same parent.

36. eNACSO is keen to see the development of innovative new ways of ensuring that children and young people understand the implications of choosing different privacy settings. There should be more scope for the use of intuitive icons and pictograms.



5.8 Seamless safety in a wireless world

37. As media convergence gains ground we will soon be in a position where internet access is ubiquitous and access will be available via a wide range of devices, many of which will be portable and in the possession of children and young people e.g. smartphones and games consoles.
38. We are moving towards an environment where WiFi or more advanced forms of wireless access will become the default means of interfacing with the internet.
39. In such a world what will be important, from a child safety perspective, is for there to be a regime of seamless safety. In a family home with a dozen or more internet enabled smartphones, games consoles, tablets, laptops and MP3 players it should not be necessary for parents, potentially, to have to learn a dozen different ways of making everything acceptably safe.

40. The Radio and Telecommunications Terminal Equipment Directive could be an extremely useful route to follow. This Directive allows standards to be prescribed for any device which wants to connect to a functioning public network of which the internet is the largest. Such standards could embrace basic aspects of online safety for children.

41. Mobile network operators have long accepted that they have a special responsibility towards children and young people. Only appropriate e-commerce activities are available to minors who use their networks. All adult services should be behind an adult bar.

42. The new types of location services and tracking technologies now emerging into the consumer market pose challenges not only in the field of online safety for children and young people, but also in relation to the civil and privacy rights of every citizen. Strong safeguards must be developed to govern their use. All location based services and apps should be classified as adult.

43. Mobile phone handset manufacturers should accept a larger role in the ongoing discussions about child safety on the internet, with a view to developing safety features that can operate by default and are integrated directly into the handsets. They should also consider developing devices with a much reduced feature set and therefore avoid some of the risks to children and young people that seem to be associated with the more sophisticated models.

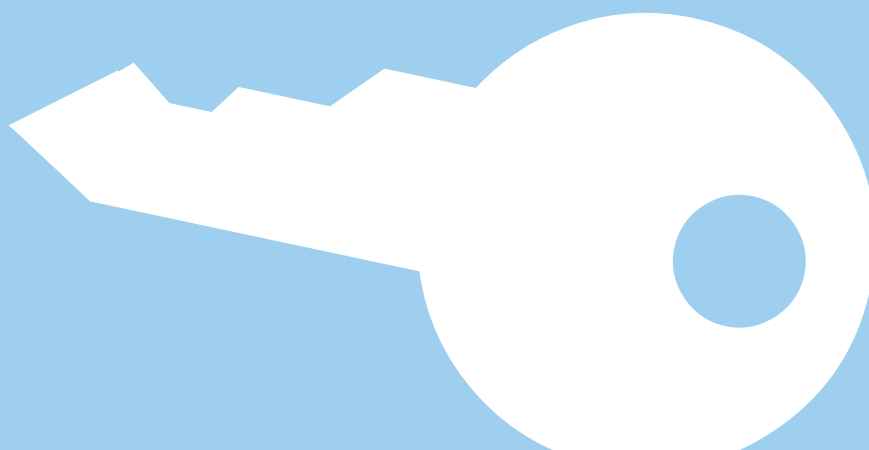
44. Providers of wifi or other forms of remote internet access should replicate the arrangements currently made by many mobile network operators to restrict the availability via handsets of adult sites on the internet.

5.9 Navigating an interactive and immersive world

45. Games publishers and games hardware manufacturers need to collaborate with other elements of the interactive and online world to develop campaigns around promoting the notion of digital citizenship and digital responsibilities. Campaigns and actions based on peer-based education initiatives should be given particular priority.

46. Support for the Pan European Game Information system and PEGI online systems needs to be developed to encompass as large a number of countries as possible. More needs to be done to promote awareness of games rating systems both in relation to parents and children and young people.

47. As apps migrate from mobile phones to other portable devices and computers they are becoming increasingly important to the EU's digital economy. Their influence is likely to extend into many different parts of our personal, social, economic and political lives. In that context it is vitally important that improved quality control and age rating systems become more commonplace.





5.10 Make social networking sites safer

48. Social networking sites should have clear and transparent standards to address online child safety, including easy to use procedures to report abuse to the appropriate agency.
49. Social networking sites should have mechanisms which allow them to review content on their site, especially pictures and videos. They should also ensure they review all content reported to them within a clearly specified time period.
50. Independent mechanisms should be developed to monitor and report on the extent to which agreed standards are being observed by social networking sites.

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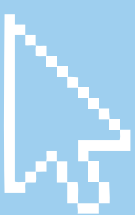
5.11 Remove legal barriers

51. Efforts should be made to clarify the civil and criminal liabilities of online service providers in relation to user-generated content hosted on their sites.
52. In particular authoritative clarification should be issued in relation to the E-Commerce Directive's "safe harbour" provisions. Any hosting company that merely inspects content on its site simply in order to ascertain whether or not there is any material present which falls foul of its terms and condition should under no circumstances attract any form of liability merely for doing that alone. The principle should always be that for any kind of civil or criminal liability to exist, it is always necessary to show the hosting company had actual knowledge of the content in question or, following receipt of a notice, deliberately took no action to remove it or failed to act to remove it within a reasonable time.

5.12 Enable NGOs to participate in the policy making processes

53. The multi-stakeholder approach to policy making ultimately depends on each individual stakeholder having both the will and the means to take part. Typically very many NGOs have the will but too often they lack the resources to allow them to make an optimal contribution. Ways should be found to help NGOs to develop their capacity to engage constructively and in a well-informed and timely way in the multi-stakeholder policy making processes, both nationally and internationally.
54. To maintain public confidence in self-regulation as a mechanism for policy-making, convincing evidence of an improvement in online child safety is required.

MEMBERS







ENASCO MEMBERS (MAY 2012)

22

1 	2 	3  Save the Children
4  Lastekaitse Liit Estonian Union for Child Welfare	5  Save the Children	6  action innocence
7  DEUTSCHE KINDER HILFE Advocates for Children	8  obrela.gr	9  KÉK VONAL Gyermekkrízis Alapítvány
10  ISPCC ALWAYS HERE FOR CHILDREN	11  Save the Children	12  Paramos vaikams centras Children Support Centre
13  kanter jugend telefon	14 	15  NOBODY'S CHILDREN FOUNDATION
16  Instituto de Apoio à Criança	17  Save the Children	18  protegeles .com
19  NSPCC Cruelty to children must stop. FULL STOP.™		

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| 2 Czech Republic | 9 Hungary | 16 Portugal |
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| 4 Estonia | 11 Italy | 18 Spain |
| 5 Finland | 12 Lithuania | 19 United Kingdom |
| 6 France | 13 Luxembourg | |
| 7 Germany | 14 Netherlands | |

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1 Armenia

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