



## **EU Kids Online**

### **Response to the Green Paper:**

### **“Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values”<sup>1</sup>**

**August 15, 2013**

#### **Introduction**

The EU Kids Online network values the opportunity to contribute to the debate on the ongoing transformation of the audiovisual landscape arising from convergence in the communications and media sector. Our focus is on the implications of convergence for the protection of minors, identified as one of the key issues that underpin European regulatory arrangements for audiovisual media services.

The Green Paper’s recognition that convergence has potentially far-reaching consequences for child protection is very timely and welcome. As a network supported since 2006 by the European Commission’s Safer Internet Programmes, EU Kids Online has sought to enhance knowledge about children and young people’s use of online and mobile technologies, informing policies designed to protect them from harm and ensuring their rights and opportunities. Our response to this consultation is grounded in the evidence base to which we have contributed through a series of significant research initiatives.

As a major part of its activities, EU Kids Online conducted during 2010 a face-to-face, in-home survey of over 25,000 9-16 year old internet users and their parents in 25 countries, using a stratified random sample and self-completion methods for sensitive questions. Now including researchers and stakeholders from 33 countries in Europe and beyond, the network continues to analyse and update the evidence base to inform policy. See [www.eukidsonline.net](http://www.eukidsonline.net) for all news and reports.

In the following, we address those items set out for public consultation which concern children and young people’s audiovisual and media experiences, focusing on policies regarding Media Literacy (Question 14) and the Protection of Minors (Questions 20-25).

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<sup>1</sup> Consultation paper available at <http://ec.europa.eu/digital-agenda/en/public-consultations-media-issues#green-paper---preparing-for-a-fully-converged-audi>

## Question 14: What initiatives at European level could contribute to improve the level of media literacy across Europe?

We recognise the important role that media literacy has played in European audiovisual policy, especially within AVMSD, and its prioritisation of the 'skills, knowledge and understanding that allow consumers to use media effectively and safely'.<sup>2</sup> Our comments here refer principally to the availability of information and advice about safe online use. Our survey of 9-16 year olds experiences of risk and safety online asked them and their parents about their actual and preferred sources of information on internet safety.

Our findings show that children and young people *currently* get internet safety advice first from parents (63%), then teachers (58%) and then peers (44%).<sup>3</sup> This pattern is fairly consistent across Europe, though for older teenagers and for children from lower SES homes, advice from teachers overtakes that of parents. Importantly, our research shows that parental advice to children is the only the factor that can be most consistently related to a lower risk of encountering online risks; it is also linked to a decrease in the likelihood of acting in a nasty or hurtful way towards others.<sup>4</sup>

In the first instance, therefore, ***support for parents should remain a policy priority with increased emphasis upon educational and awareness-raising efforts that improve public understanding of media literacy.***

Our findings further show that parents *currently* get internet safety advice first from family and friends (48%) rather than from more formal channels such as traditional media (32%), the child's school (27%), government or local authorities (7%) or children's welfare organization (4%).

There is a clear appetite for more information on internet safety amongst parents as only around 9% say that they don't want further information on internet safety. A direct comparison between the actual and desired sources of information suggests that more parents would like information to come to them through schools and from the government. However, 'there is no 'one size fits all' solution. Most parents will disseminate information about safe internet use to their children, regardless of the method by which they have acquired it. But parents who have not received any online safety information are less likely to have given such advice to their children, compared with parents who have received advice.

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<sup>2</sup> (2010). Directive 2010/13/EU of the European Parliament and of ... - EUR-Lex. Retrieved from <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:EN:PDF>.

<sup>3</sup> Livingstone, S. (2011). Risks and safety on the internet: the perspective of European children. Retrieved from <http://eprints.lse.ac.uk/33731/>.

<sup>4</sup> Staksrud, E. and Ólafsson, K. (forthcoming, 2013). Awareness strategies, mobilisation and effectiveness. In B. O'Neill, E. Staksrud & S. McLaughlin (Eds.), *Towards a Better Internet for Children? Policy Pillars, Players and Paradoxes* Goteborg: Nordicom, UNESCO International Clearinghouse for Children, Youth and Media.

When asked to identify their *preferred* source of information about internet safety, the child's school was the most popular choice among parents. Schools uniquely have the ability to reach all children and consequently, we have argued that ***levels of teacher involvement in promoting media literacy should be further prioritised.***<sup>5</sup>

It is noteworthy that the youngest children in our survey (9-10 years) report getting the least safety advice from their teachers, even though ever younger children are gaining access to the internet across a variety of devices. Thus we argue that ***primary schools in particular should increase their education efforts around media literacy and safety guidance for pupils.***

The low take up of information support from industry sources is a cause for concern:

- Traditional media (radio, television, newspapers or magazines) are mentioned by 32% of parents;
- Internet service providers are cited by just 22%, and websites with information by 21% of parents;
- Information supplied by manufacturers and retailers selling products are used by just 10% of parents.
- Children also appear to lack trust when it comes to reporting or talking to someone in authority: when something upset them online, just 7% spoke with a teacher and 2% to a person whose job it is to support children.

There is considerable scope, therefore, for industry to increase awareness of its own efforts in relation to internet safety and to build trust in its capacity to respond to children's concerns. The 'Strategy for a Better Internet for Children'<sup>6</sup> calls on industry to step up its support for user-friendly tools and safety features and to work proactively with NGOs and schools to support digital and media literacy. ***This important emphasis on industry tools and awareness should be further encouraged through co-regulatory measures, and it should be verified through independent evaluation.***

Civil society, NGOs and independent groups are also important actors in awareness-raising for online safety. However, across the EU their initiatives do not follow a common strategy, and are often fragmented even within individual countries. This arises partly from their diverse funding sources and partly because they work in different cultural/political/economic contexts. There is a need, therefore, for greater cohesiveness across the sector in relation to approaches to media literacy. Sustainable funding mechanisms for literacy and safety initiatives, as well as independent evaluation of their effectiveness, are now vital to guide and improve future developments in this area.

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<sup>5</sup> (2013). EU Kids Online II Final Report - London School of Economics and ... Retrieved from <http://eprints.lse.ac.uk/39351/>

<sup>6</sup> (2012). Creating a Better Internet for Kids - Digital Agenda for Europe ... Retrieved from <http://ec.europa.eu/digital-agenda/en/creating-better-internet-kids>.

EU Kids Online welcomes the establishment of the CEO Coalition of 31 leading companies to address the five key objectives of i) simple and robust tools for users, ii) age-appropriate privacy settings, iii) wider use content classification; iv) wider availability and use of parental control and v) effective removal of child abuse material. We note that members of the self-regulatory ICT Coalition have pledged to support education and awareness-raising of internet safety on behalf of its members.<sup>7</sup>

**We urge that industry support for media literacy, as recommended in the Strategy for a Better Internet for Children, features strongly in the CEO Coalition’s commitments.**

Appropriate mechanisms to promote pan-industry support for partnerships in digital and media literacy would be a valuable means of connecting industry knowledge of current technological trends with the pedagogical expertise of civil society groups.

**Question 20: Are the current rules of the AVMSD appropriate to address the challenges of protecting minors in a converging media world?**

One of the principal challenges to the effectiveness of AVMSD in protecting minors is the increasingly blurred boundary in a converging media world between traditional forms of media consumption and new connected services and devices adopted by children and young people. In particular, the anomaly noted in the Green Paper (p.11) whereby content on the same device may be subject to different regulatory regimes, resulting in user confusion, has important implications for safety provision and awareness-raising.

Noting that the remit of AVMSD extends only to media service providers (i.e. to professional media organisations which retain overall editorial responsibility for output), there are grounds for concern regarding the proliferation of user-generated content, as well as other content from outside the European Union, that is not subject to any regulatory oversight except under terms of service applied by internet service providers.

Our evidence suggests that such content, while an intrinsic feature of a dynamic and open internet, affords potential harm to children. When asked if there were things on the internet that would bother children their own age, 55% of 9-16 year olds in Europe confirmed that there were things online that made them uncomfortable, upset or felt they shouldn’t have seen it.<sup>8</sup>

In response to open-ended questions about what bothers them online, potentially harmful content tops the list of children’s concerns, constituting 58% of all risks mentioned by children. Pornography (22%) and violent and aggressive content (18%) were among the main forms of content cited by children.<sup>9</sup> 21% of 9-16 year olds (and nearly a third of all older teenagers) had seen one or more types of potentially harmful user-generated content. The particularly graphic nature of gory or violent content online, including real

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<sup>7</sup> (2013). ICT Coalition. Retrieved from <http://www.ictcoalition.eu/>.

<sup>8</sup> Livingstone, S. (2013). Risks and safety on the internet: The perspective of European children. p.46. Retrieved from <http://eprints.lse.ac.uk/33731/>

<sup>9</sup> Livingstone, S., Kirwil, L., Ponte, C., & Staksrud, E. (2013). In their own words: what bothers children online? with the EU Kids Online Network. Retrieved from <http://eprints.lse.ac.uk/48357/>

depictions of cruelty, killings and abuse of animals, added to the depth of many children's reactions.

The wide availability of potentially harmful online content and its negative impact on many children suggests that current arrangements are not working. Beyond the provisions for protection of minors under AVMSD, a range of self- and co-regulatory initiatives (such as the *CEO Coalition to make the internet a better place for kids*), have been charged with the task of developing pragmatic solutions to fostering better safety. These include, *inter alia*, reporting tools, wider use of content classification and parental controls.

***We argue that to be effective such solutions need to be supported and updated by evidence from children themselves of the problems they encounter. Also vital are appropriate evaluations of the effectiveness of proposed and actual solutions.*** Expert assessments, while useful, may not reflect all areas of concern for children and the involvement of children in the testing and assessment process should be an important principle of evaluation. Evaluation, furthermore, should be periodic in nature and independently conducted to determine progress made.

**Question 21: Although being increasingly available on devices and platforms used to access content, take-up of parental control tools appears limited so far. Which mechanisms would be desirable to make parents aware of such tools?**

Our research investigated the use of parental controls in the context of children's internet use. Parents, as our research shows, are very concerned about their children's online safety: one third of parents say they worry a lot about their children being contacted by strangers on the internet or seeing inappropriate material.<sup>10</sup> While parental fears and worries may not always be the most accurate compass for what is actually harmful for children online, it is illustrative of some genuinely-felt concerns.

We asked the parent most involved with the child's internet use if they use filtering or monitoring software at home. One in three European parents claims to filter their child's internet use and a quarter use monitoring software. There are no notable gender differences, but middle class parents are a little more likely to use parental controls, and parents of younger children are a lot more likely to use them.

As some two thirds of parents in Europe do not use filtering or monitoring software at present, there is clearly scope to increase take up of these tools. At present, wide country differences are apparent with parental control tools used most in UK and Ireland (54% and 48% respectively) and least in Romania and Lithuania (11% and 9%).

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<sup>10</sup> Livingstone, S., Ólafsson, K., O'Neill, B., & Donoso, V. (2012). Towards a better internet for children. *Age*, 9(12), 13-16. p.3. Retrieved from <http://eprints.lse.ac.uk/44213/>

Further analysis of our findings shows that parents are more likely to use filters:

- If they are regular users of the internet themselves;
- If they are confident in using the internet;
- If they say that they worry a lot about their child seeing inappropriate material on the internet or being contacted by strangers on the internet.

Older parents, parents of older children or of children who use the internet daily or of children who spend more time online are all less likely to make use of filters.

We acknowledge that there are a range of views on the appropriateness of filtering tools, especially for older children and teenagers, especially if these are used in preference to more active forms of mediation on internet safety (e.g. discussion between parent and child, sharing online activities together). ***As a minimum, more attention should be given to raising awareness of the role that such tools can play in supporting safer internet use by children. Furthermore, concerns about their effectiveness should be addressed to ensure that they meet parents' needs.***

Our analysis shows that use of parental controls does appear to reduce children's online risk; however, this is at the expense of children's digital skills and opportunities. On the other hand, we have found some evidence that active mediation (i.e. greater parental engagement) reduces risk but not skills or opportunities.<sup>11</sup>

In summary, while parental controls are widely promoted as a useful way to keep children safe online, particularly younger children, current strategies to support their adoption are clearly insufficient, since some two thirds of parents do not use them. We urge that the use of parental controls or filtering software should not be regarded as the sole solution for keeping children safe online. Technical solutions can create a false sense of security for parents, teachers and carers who may think that by applying certain types of software, children will be safe online without them having to do more or engage with their children's internet use. In addition, the use of parental controls is associated with reduced digital skills and opportunities among children's, while active mediation (such as sitting with your child, talking to your child) reduces risk, but not skills and opportunities.

Where appropriate, parents could be encouraged to consider making more use of parental controls and other technical solutions, although this will require greater availability of easy-to-use, carefully tailored, affordable and effective tools. ***In particular, greater attention should be given to ensuring that parental controls allow for the customisation of the online environment in order to cater for the diverse backgrounds, contexts of use, family interactions and parental styles of the European parents and children for whom these tools will be designed.***

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<sup>11</sup> Duerager, A., & Livingstone, S. (2012). How can parents support children's internet safety? Retrieved from <http://eprints.lse.ac.uk/42872/>

## Question 22: What measures would be appropriate for the effective age verification of users of online audiovisual content?

The topic of age limits and systems of effective age verification has prompted much debate among child safety experts and industry providers. The adoption of fixed age limits for access to various forms of online content and communications services, while setting an industry-wide standard, does not always take into account children's differing stages of development or levels of maturity. In the absence of any alternative method for assessing individual children's or young people's competence or level of cognitive development, it is widely held that fixed age limits need to be applied.

The problem is that there is little consensus about the precise age limits that should apply to different kinds of services. Most large internet companies (Facebook, Google etc.) have followed privacy legislation in the United States<sup>12</sup> and adopted 13 as the age limit for access to many internet services. Some social networking services do not have an age limit but require parental consent below a certain age: 16 in the case of Hyves based in the Netherlands<sup>13</sup> or 14 in the case of Iwiw<sup>14</sup>, Hungary's largest social networking provider, and Tuenti, based in Spain<sup>15</sup>. Nonetheless, we consider that the age of 13 years or thereabouts is a reasonable threshold. This threshold receives little dissent among researchers of children and youth, and considerable support from developmental psychology.

More problematic is the fact that the registration process instituted by many social media services relies upon the *professed* age of the user. In the absence of any independent age verification mechanism, this enables easy circumvention by underage users. Our findings in relation to children's use of social networking services reveal that large numbers of children under the age limit set by the company have registered a profile on the service.<sup>16</sup> Specifically, across Europe, we have found that 27% of 9-12 year olds display an incorrect age on a social networking profile. In the case of Facebook, the most popular social networking service in Europe, 20% or one fifth of 9-12 year olds have registered a profile using a false age in contravention of the company's age restriction. This includes 46% of 9-12 year olds in the Czech Republic, 42% in Denmark, and 34% in the UK.

Among the safety issues that arise are concerns for children's privacy and their ability to consent to collection of personal data, the basis on which legislation operates in the United States and is proposed in reform of data protection legislation in Europe.<sup>17</sup> We have found that over a quarter of 9-12 year old SNS users have their profile 'set to public', only just different from the proportion of 13-16 year olds. Although fewer 9-12 year olds have

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<sup>12</sup> Children's Online Privacy Protection Act of 1998. Retrieved August 15, 2013, from <http://www.ftc.gov/ogc/coppa1.htm>.

<sup>13</sup> "Hyves." 2005. 30 Jul. 2013 <<http://www.hyves.net/>>

<sup>14</sup> "iWiW: Bejelentkezés." 2005. 30 Jul. 2013 <<http://iwiw.hu/>>

<sup>15</sup> "Tuenti." 2006. 30 Jul. 2013 <<http://www.tuenti.com/>>

<sup>16</sup> Livingstone, S., Ólafsson, K., & Staksrud, E. (2011). Social networking, age and privacy. *London, EU Kids Online, London School of Economics*. Retrieved from <http://eprints.lse.ac.uk/35849/>

<sup>17</sup> (2012). Safeguarding Privacy in a Connected World A European Data Protection Framework for the 21st Century. Retrieved August 15, 2013, from <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52012DC0009:en:NOT>.



profiles, it is a concern that, among those who do, they are no more likely to keep their profile private than older children. In most countries (15 of the 25 nations involved in EU Kids Online II), younger children are *more likely* than older children to have their profiles public. Furthermore, just under half (45%) of younger Facebook users (11-12 year olds) know how to change privacy settings. Similarly, about 4 in 10 do not know how to block another user, a vital safety skill when encountering potentially harmful contact.

In summary, the application of age restrictions on popular social media services is only partially effective. Fewer younger than older children use social networking but, nonetheless, many 'under-age' children are using SNS. Setting aside the question of whether it is appropriate for young children to use SNS services, ***it seems clear that measures to ensure that under-aged users are rejected or deleted from the service are not successful among the top SNS services used by children in Europe. We recommend that, either, age verification measures are made fully effective (to prevent 'under-age' use) or that the presence of younger users is acknowledged and addressed. Given that our research also shows that many parents of 'under-age' users seek to ban their children from using Facebook and similar services, our preference is for the former solution.***

**Question 23: Should the AVMSD be modified to address, in particular, content rating, content classification and parental control across transmission channels?**

As we observe under Question 20 above, convergence in the delivery of audiovisual media content and the increasingly blurred lines between content and communications platforms pose challenges for ensuring protection of minors in today's media environment. Parental controls are widely available across a variety of channels - transmission-based, i.e. terrestrial/satellite broadcast as well as via the internet. However, as we have found, parental controls for internet devices are only used by a third of parents across Europe, more in some countries and in others hardly at all.

A challenge for content rating is to develop suitable approaches to deal with the wide range of user-generated content which, as we note above, can contain material that is potentially harmful and upsetting for children. One in five 11-16 year olds, our research shows, have come across one or more types of potentially harmful user-generated content in the past 12 months. Content rating is also needed for other commercially-produced content which is not suitable for children or which some people may consider offensive. A rating system to be informative and effective needs to be supported by appropriate education and awareness raising efforts and be consistently applied across the range of services accessed by children.

***Our recommendation is for more support to encourage parents to make more use of the array of parental controls, while noting that industry can do more to provide easy-to-use, carefully tailored, affordable and effective tools.*** We note also that active mediation by parents of their children's internet use – parents talking to their child about the internet, staying nearby or sitting with them while they go online, encouraging them to explore the internet, and sharing online activities with them – can reduce online risks, notably without reducing their opportunities.



***Information and guidance in the form of content ratings and content classification will undoubtedly assist parents in making more informed decisions about how to support their children’s internet use.*** Research conducted for Ofcom in the UK demonstrated strong support for the labelling of content through the provision of detailed descriptions of content in trailers and in EPG information, and audio-visual indicators and warnings about potentially offensive or unsuitable content.<sup>18</sup>

Similarly, research in Australia has indicated that parents appreciate information about the possibly troubling content of media (“consumer advice”) and may find this more useful than recommendations around the appropriate minimum age of viewers.<sup>19</sup> The provision of consumer advice regarding material classified as PG and above can encourage in-family discussion and an active mediation style, complementing the value of parental controls.

Additionally, while industry players might argue that their responsibility is to mitigate harm rather than offence, we note that tagging and other tools which allow users to comment on the content can provide valuable information to future users about the type of content contained. ***Clear and appropriate labelling of content should be promoted, to aid parents and other users, and as a defence against complaints about the nature of available media content.***

In summary, most parents believe it is worth engaging with their child’s internet use, and they employ a wide range of strategies, depending partly on the age of the child. But our survey identified that there are some parents who do not do very much, even for young children, and there are some children who would like their parents to take more interest and play a more proactive role. It is a policy priority now to reach these parents with awareness raising messages and resources. Interestingly, our findings show that over half of parents across Europe (53%) think they should do more in relation to their children’s internet use, so clearly additional supports would be welcome.

**Question 24: Should users be better informed and empowered as to where and how they can comment or complain concerning different types of content? Are current complaints handling mechanisms appropriate?**

The capacity to report distressing or inappropriate material to the internet service or site provider, and to have such reports acted upon in a timely way, is a vital element of an effective self-regulatory system. According to our research, the take up of reporting mechanisms is low indicating that there is considerable scope to further promote their availability, age-appropriateness and use. Our findings reveal that only 13% of 9-16 year olds who were upset or bothered by an online risk used actively reporting tools to address their distress. This includes 9% of those upset by sexual messages, 15% of those upset by

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<sup>18</sup> (2012). Ofcom | Protecting audiences in a converged world. Retrieved August 15, 2013, from <http://stakeholders.ofcom.org.uk/market-data-research/tv-research/protecting-audiences/>.

<sup>19</sup> (2012). Classification—Content Regulation and Convergent Media (ALRC ... Retrieved August 15, 2013, from <http://www.alrc.gov.au/publications/classification-content-regulation-and-convergent-media-alrc-report-118>.

sexual images, 10% of those upset by meeting an online contact offline, and 9% of those upset by bullying messages.

Moreover, two thirds of children who reported content or conduct risks found the response helpful, but one third did not. Our analysis shows that reporting tools offer a particular benefit to girls, more vulnerable children, and those from poorer homes, perhaps because of the lack of alternative resources for these children. Therefore, extending their availability and ease of use is highly desirable.

It is the case that the more widely and deeply children use the internet, the more they will encounter risk and the more they are likely to use reporting tools if upset. Therefore, as children gain internet access via more diverse and personal platforms, ensuring that there are consistent, easy-to-use reporting mechanisms and safety information on all devices is vital. In our submission to the CEO Coalition's working group tasked with the development of simple and robust reporting tools for users,<sup>20</sup> ***we recommended making industry-provided reporting mechanisms more accessible and trusted.***

This should include:

- Clear, child-friendly communication about reporting tools and procedures - how they work, what they are for.
- Making them more prominent and accessible in all areas where they might be needed, not just on a 'hidden corner' or very deep in the website's navigation.
- Responding to and acting upon all reports of inappropriate content or behaviour expeditiously.
- Making them open so that both predefined and also new risks and concerns can be reported - it is vital to keep listening to children so as to recognise and provide appropriate support for the changing array of risks that children face online.
- Making them available and easy to use by children and adults – including non-users. Not only users but also non-users such as a parent or teacher without a SNS account may also want to report certain situations or content to the provider. In such cases, they should not be obliged to create an account before being able to submit a report.
- Ensuring that there are effective protocols and re-direct mechanisms in place with relevant local organisations (e.g. Safer Internet Centres, law enforcement, helplines, children's charities).
- There must also be effective 'back office' mechanisms to ensure the prompt review of inappropriate, abusive or illegal content or behaviour.
- Independent evaluation of the effectiveness of reporting is crucial, both to measure whether improvements have been made (against benchmarks) but more importantly, whether those improvements work - i.e. are they actually meeting children's needs.

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<sup>20</sup> Livingstone, S., Ólafsson, K., O'Neill, B., & Donoso, V. (2012). Towards a better internet for children. *Age*, 9(12), 13-16. Retrieved from <http://eprints.lse.ac.uk/44213/>

In order for children /users to gain trust in the reporting mechanisms it is essential that:

1. **Users get a reply** (i.e. that they know/feel that something will be done) such as sending them some sort of acknowledgment that their report has been received and that it will be dealt with.
2. **Action is taken** so that the child/user's problem (if justified) is really "solved" and even if the problem is not solved completely, users should be left with the feeling that something was done to help them solve their problem. If after reporting users do not get this impression, trust in the available reporting mechanisms will be lost.
3. **Users are given feedback** on the outcome of the report so they are not left wondering about its status.

**Question 25: Are the means by which complaints are handled (funding, regulatory or other means) appropriate to provide adequate feedback following reports about harmful or illegal content, in particular involving children? What should be the respective roles/responsibilities of public authorities, NGO's and providers of products and services in making sure that adequate feed-back is properly delivered to people reporting harmful or illegal content and complaints?**

As we have found in our research, use of reporting tools by children who are upset by something online is rather low. We cannot determine from the EU Kids Online survey whether this is because there are no tools available or children find them difficult to locate or use; they may also prefer other coping strategies (e.g. to tell a parent or teacher).

Usability studies carried out with 12-17 year olds on social networking sites demonstrate that even though young users recognise the usefulness of reporting mechanisms, they face difficulties using them.<sup>21</sup> Lack of user-friendly reporting mechanisms may therefore discourage users from sending reports.

***Better handling of reports, including the provision of adequate feedback is undoubtedly a step in the right direction. In this respect it would be very valuable if industry players, including members of the CEO Coalition, made public their data around response rates and response times.***

Where laws have been broken, all complaints should include notification to law enforcement agencies who can require and ensure appropriate take-down action and investigate criminal behaviour. Where the complaint is one of harm, rather than of illegality, this can be addressed according to the response to Question 24.

**For more on EU Kids Online, visit [www.eukidsonline.net](http://www.eukidsonline.net)**

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<sup>21</sup> Sinadow, H. (2011). Usability tests with young people on safety settings of social networking sites. European Commission, Safer Internet Programme, [http://ec.europa.eu/information\\_society/activities/social\\_networking/docs/usability\\_report.pdf](http://ec.europa.eu/information_society/activities/social_networking/docs/usability_report.pdf)