

# Parent Zone response to the Age Appropriate Design Code

## About us

Parent Zone is the leading provider of expert information on all the issues facing families that are caused or amplified by the internet. We deliver projects around the globe, working with parents and families on emerging issues and partnering with technology companies to stay ahead of complex challenges. Our work reaches more than 15 countries and millions of parents and families every year.

Our response covers the areas in which we have expertise and reflects the concerns parents have raised with us.

## Introduction

Technology has had a profound impact on family life, with its effects felt acutely by parents, children and the professionals supporting families. Digital technology brings unprecedented, exciting opportunities; at the same time, it is clear that children and young people have particular vulnerabilities in relation to it. The AADC rightly seeks to address these. Our view - drawing on the expertise of the UKCIS digital resilience working group, which we co-chair, is that there is currently an over-reliance on solving the problems of this relationship one-sidedly, through technological solutions.

The Code - while extremely well thought-out and useful - overlooks the need for children to develop digital resilience, which they cannot do unless they have appropriate opportunities to explore the digital world. In practice, it is unlikely that any technological solution can provide absolute protection to all children (who have very variable degrees and types of vulnerability). There is consequently a need to attend to

the ways in which children receive, understand, interpret and process online activity, and also on how they are supported to do so.

We believe the Code should not be seen as a complete solution, but needs to be implemented in conjunction with various means of building children's and young people's digital resilience. The Code could be a crucial step towards developing services that are 'safe enough' for children to explore in order to develop resilience.

## **Background**

The Revealing Reality report, commissioned by the Information Commissioner's Office (ICO), shows that children are spending more and more time online, with 99% of 12-15-year-olds online in 2017, along with 53% of 3-4-year-olds.<sup>1</sup> Given the significant number of internet users who are children, it is timely to consider whether the internet could do more to become child-centric by design - and we support the introduction of an age-appropriate design code through an amendment to the Data Protection Bill to place the needs of children, parents and families at the heart of product and service design. Parent Zone fully supports the notion that 'design standards shouldn't be based solely on age', since there are significant developmental differences between children of the same age; we also recognise the importance of parents in understanding their own child's development, and in protecting the best interest of the child.<sup>2</sup>

We share the ICO's view that increased digital literacy is important, particularly among parents, who often struggle to understand the nature or implications of their child's online activity.

Alongside our support for the aims of the design code, we have concerns about the limits of technical solutions and the unintended consequences of an over-reliance on such solutions to keep children safe. A growing body of research, including work done by Professor Victoria Nash at the Oxford Internet Institute, reminds us that some technical solutions do 'nothing to protect users from aversive experiences'.<sup>3</sup>

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<sup>1</sup> [ICO, 'Towards a better digital future: Informing the Age Appropriate Design Code p. 4](#)

<sup>2</sup> [ICO's Call for Evidence - Age appropriate Design Code: summary of responses, p. 2](#)

<sup>3</sup> [Przybylski, A K, Nash, V, 'Internet Filtering Technology and Aversive Online Experiences in Adolescents'](#)

While ‘safety by design’ can deliver important benefits, it should not be seen as an alternative to ‘good enough’ at-home parenting, helped by high standards of education designed to foster digital resilience. We caution against the desire to find easy solutions to complex social problems.

## **1) Age Appropriate Application**

Parent Zone has long advocated for the needs of children to be factored into product and service design. Given the number of children online, it is only sensible to assume that a significant proportion of users of any given service could be children. The recommendation of robust and verifiable age-verification is also welcome for some situations. We must however be careful that in encouraging platforms to think about the needs of their younger users, we do not further exclude parents from their children’s digital lives. Creating environments that are more suitable for children is critical, but parental supervision remains essential: undermined parenting leaves children more exposed to unforeseen risks and harms.

Platforms should be encouraged to recognise that parents have a role in supporting their children when they are online, just as they do when they are offline. A requirement for parental consent and/or parent-linked accounts would facilitate this. If parents are not given the tools to engage with their child’s digital environments, it is entirely unreasonable to continue to expect them to carry responsibility for their behaviour. Children cannot be left in legal limbo online: platforms should either be given the responsibility of a trusted adult acting ‘in loco parentis’, with an associated legal duty of care, or parents should be enabled to have appropriate levels of engagement. The UK government’s online harms white paper is suggesting a legal duty of care which might address this concern.

## 2) Parental Controls

Parent Zone fully supports the ICO's view that parents play a key role in the protection of their child, and that this is also the case online (it would be strange to suggest otherwise). We agree that the parental controls provision of the Code could be used to support parents in protecting and promoting the rights of their child, and might help to improve their media literacy.

The desirability of greater parental media literacy is clearly expressed in the Code's provision that information about children's rights and the UNCRC should be provided to parents. Our research, however, shows that 77% of children feel that parents do not understand their life online.<sup>4</sup> In other words, we are starting from a low base of parental ability to engage in children's online lives and, if we are to develop digital resilience in children, it is crucial to bridge the knowledge gap between parents and children online.

It is also important to remember that while parents - and policymakers - tend to gravitate towards a 'technical control'-based approach to digital parenting, as an apparently simple response to a complex problem, research consistently shows that parental controls that place limits on children's online activities are not effective. In our report, 'Ordinary Magic' we explain why an 'over-reliance on risk-focused interventions such as filtering are not an effective way to promote digital resilience.'<sup>5</sup> We urge the ICO to consider how to deliver education and information for parents alongside technical solutions. The best way to improve the interactions between children and technology is to address the relationship from both sides, looking both at the tech platforms and at the need for education, development, agency and creativity of those who are using them.

It is a matter of regret that parents have not been properly consulted in the research done thus far for the code and we hope that this will be corrected. We would also urge the Commissioner to consider the work done by the UK Council for Internet Safety Digital resilience working group, including the Digital Resilience Framework.

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<sup>4</sup> [Parenting in the Digital Age: How are we doing?, p. 8](#)

<sup>5</sup> [Ordinary Magic, p. 6](#)

### 3) Nudge Techniques

It is generally acknowledged that nudge techniques lead to excessive screen use on many online services. There can be little doubt that parents face an unequal battle when it comes to children using services that seek to monopolise their time and attention. Reward loops and positive reinforcement techniques, such as 'likes' or 'streaks', encourage behaviours that are difficult for parents to manage and can lead to high levels of conflict and anxiety.

Any technological remedies would be welcome but once again we would urge a parallel education effort alongside design solutions. Technology cannot be a substitute for effective parenting, because it is parenting that helps children internalise rules and develop habits that will be fundamental to their digital wellbeing as adults.

## Conclusion

Parent Zone welcomes the proposals set out by the ICO in the Code and strongly supports the ambition to place the best interests of children at the heart of how online products and services are developed. There is clear evidence and research that indicate that children and young people are spending increasing amounts of time on online platforms and services that are not designed for them, and the Code goes a good way towards ensuring that online environments will become safer.

The ICO identification of the importance of parents and carers in safeguarding the rights of the child is key to building resilience and enabling children and young people to flourish. Parent Zone believes the Code is an important step towards safeguarding children online, and that, potentially, it offers an opportunity to build a broader framework to support children online, one in which authoritative parenting is enabled to play its necessary part in children's development as digital citizens. This would be best enabled by reinforcing the technological solutions with initiatives to improve the media-literacy of parents and to bridge the gaps in digital understanding between them and their children. Parent Zone welcomes the provisions of the AADC and calls for continued support for parents and renewed focus on digital resilience.