

Response of the Quatro Plus project to the Safer Internet Public Consultation on Age Verification, Cross Media Rating and Classification and Online Social Networking.

Questionnaire 1 - Cross Media Rating and Classification

1. Of which media rating systems are you aware in your country. Has there been an attempt to implement a cross-media rating system? If yes, what are the positive outcomes of it and its success factors? If no, what could be used as a starting point towards a cross media rating system?

The Quatro Project is aware of a number of national cross media ratings systems, each partner being familiar with their national film and video and to a lesser extent, games rating systems. We are very much aware of PEGI at the European level as the project would particularly like PEGI Online to adopt the POWDER standard and use Quatro.

2. What are the main obstacles moving towards a pan-European cross media rating system?

In the UK, the Byron review recently recommended that both the UK BBFC system and PEGI be used on games as the former was better understood. At present, lack of understanding of pan-European systems such as PEGI may prove a hindrance as if a cross-media system is to be developed, then presumably this should be at least a pan-European system. However, ratings are very a broad approach and become more so when applied to a variety of different media. They do not supply parents or children with any information that allows a judgement to be made as to the cultural suitability of a game, educational content and other aspects which are considered relevant. This is where quality labels can help and enhance the 'web of trust', providing that additional level of information to allow gamers, parents and those responsible for the welfare of minors to make informed decisions. We think that it is important that this aspect is kept within the quality labelling domain as the rating system needs to be simple and straightforward if it is to be successfully implemented and understood. Quality labels can also enable multiple labels to exist for a media instance from different domains. For example, a game could be separately labelled for accessibility, educational content and as recommended game by a Labelling Authority who specialises in online gaming. Furthermore, user generated labels can also register their approval and further boost the overall aggregate quality label status of this particular game.

3. What role should the different stakeholders play (industry, public bodies, etc.), towards implementing a pan-European cross media rating system?

It is important that all stakeholders are involved, particularly parents, and that industry listens to the end-users. We do not want the situation that currently exists for food labelling in the UK where the large supermarkets ignored government advice to create a unified labelling/rating system and each bought out their own system which has resulted in consumer confusion over the meaning of these labels and ratings.

4. Are you aware of relevant research, pilot projects, or national cross media rating initiatives? If published online, please provide us with the relevant URL.

A cross-media grouping in the UK produced some guidelines on good practice (see <http://www.audiovisualcontent.org/>). However, these are very broad and certainly do not constitute a unified rating system. This had been the starting point of the discussion but it quickly became clear that no such system would be adopted willingly by the participants. What the guidelines do ensure is that parents will be able to see relevant rating information at the point of choice, whichever medium they are using.

Questionnaire 2 – Age Verification

Age verification is not directly relevant to quality labelling and trustmarks although Quatro Plus appreciates its importance. It is quite feasible that reliable age verification could become a quality label criteria and that a label could indicate *which* age verification system (AVS) was being used.

1. Which age verification systems are you aware of? In which domains are they being used?

In general we are familiar with three types of content where AVS is used:

- a) Credit card or a cell phone with age verification in e-commerce sites and/or porn sites – the problem here is that anonymous credit cards are sold in some countries, so age verification can not be done.
- b) Electronic voting systems and gambling terminals – face to face personal identification is required to get a specific ID to vote or gamble
- c) Social networking sites – some of them just ask for age without proof; most of them, however, do ask for proof of age (driving licence, passport, personal ID or social security number)

2. Do you think that these systems are efficient? If yes, please state why. If no, why do you think they are unsatisfactory?

The efficiency of those systems are limited – they can be easily misused or evaded. Moreover, closely related to strengthening efforts to validate data verifying age is the danger of personal data mistreatment.

3. Are you aware of legal requirements in your country for providers of online services to verify the age of their visitors/customers?

In most European countries the age verification issue is second to the personal data security. It seems to be a main reason why the AVS is so weak.

4. Are you aware of relevant research, pilot projects or national initiatives towards age verification on the internet? If published online, please provide us with the relevant URL.

Yes – see <http://blogs.law.harvard.edu/palfrey/category/internet-safety-technical-task-force/> or: <http://www.scribd.com/doc/2887234/Social-Networking-and-Age-Verification-ThiererPFF>

Questionnaire 3 – Online Social Networking

Quatro Plus is developing a Quality Social Network (QSN) to demonstrate how quality labels can be used by people in the social networking context to register their agreement or otherwise with quality labels and to have access to aggregate ratings statistics within the QSN. These aggregate statistics should provide an indication of which SNS and features are well regarded or otherwise and guide users towards the more trustworthy and popular SNS.

1. What risks are minors most likely to encounter on SNSs? Are you aware of relevant research or statistics? If published online please provide us with the relevant URL.

Bullying, grooming, providing too much personal information which can be used for fraudulent purposes now and in the future (for instance posting personal photos in delicate situations, etc.).

2. What controls, if any, should be available to parents over their children's SNS accounts? Should parents be allowed to cancel accounts or change profiles of their children?

Parents should educate themselves, their children and respect ethical standards. Prohibiting, limiting access or spying is not ethical and may result in children rebelling against their parents

3. Which tools are the most appropriate to protect minors when using SNSs? What further steps should SNS providers take to reduce the risks to minors on their sites?

Education and prevention is the most important tool. A best and worst practice repository to be well promoted among SNS users will help.

4. What should Members States do in order to improve the safe use of SNSs by minors? (E.g. legislation, co-regulation, awareness activities, introduction of the subject into the educational curricula, etc).

Awareness and education seem the most effective methods.