

Best Practices for Children's Online Protection

David Edelstein



COP Laws and Organizations Around the World

- United Nations: [Convention on the Rights of the Child](#), UNICEF, ITU
- United States: [Children's Online Privacy Protection Act](#) (COPPA), [Children's Internet Protection Act](#) (CIPA)
- European Union: [General Data Protection Regulation](#) (GDPR)
- China: [Regulations on Network Protection of Children's Personal Information](#)



More COP Laws and Organizations Around the World

- Nigeria: [Child's Right Act](#)
- United Kingdom: [Digital Economy Act 2017](#), [Online Harms White Paper](#)
- Civil Society: [Project Open Eyes](#)
- Public-private Partnerships: [Alliance to Better Protect Minors Online](#)



How is “Child” defined?

- COPPA protections apply to people younger than 13
 - Very influential
- GDPR requires parental consent to data processing for people younger than 16
- Digital Economy Act sought to require age verification on pornography sites to ensure visitors were at least 18
- Regulations on Network Protection of Children’s Personal Information applies to people younger than 14



Why Additional Protections for Children?

- Children are more easily frightened
- Children are impressionable
- Certain activities are illegal for children
- Parents can make certain decisions for children
- Children become more capable as they approach adulthood
 - ...but their actions also have higher stakes



Parties

- Child
- Family
- Peers
- Government
- Corporations
- Civil society
- Cybercriminals



Child Sexual Abuse Material Prevention

- Most countries have laws criminalizing the production or distribution of CSAM
- Possession of CSAM usually also illegal
- Some debate around definition
 - Should drawn material depicting underaged children count?



Child Sexual Abuse Material Prevention

- Laws should not punish children for sharing sexual images they created of themselves
- ISPs should remove CSAM promptly
- Major platforms already capable of detecting and removing CSAM



Grooming

- Building a relationship for the purpose of exploitation, usually sexual in nature
- Can be hard to define legally and distinguish from development of harmless intimate relationship
 - ★ As with CSAM, we don't want to punish teens for possibly-unwise behavior
- Enticing sexual material from minors can be made illegal, as can “revenge porn” — threatened or actual release of sexual material



Grooming

- Challenging to get victims to report it due to lack of knowledge and fear of reprisal from groomer or community
- Mandated reporting laws can be double-edged sword: they inhibit cover-ups by institutions, but may discourage reporting
- Catfish: Ghana Edition?
- Train parents and teachers to notice



Information Privacy for Children

- Many laws grant additional privacy protections to children
 - E.g. COPPA, GDPR, Regulations on Network Protection of Children's Personal Information
- Parental consent for data processing
- How to identify children?
- Material aimed at children vs. aimed at everyone vs. aimed at adults



Privacy Versus Protection

- Measures that increase parental or governmental oversight for protection hinder privacy
 - E.g. parents having access to all of child's messages and internet history
- Empowering parents to protect their child can also empower controlling or abusive ones



Digital Safety for Children

- Myriad security and privacy threats online
- Privacy and security by design
 - Built-in password managers
 - Built-in malware blockers
 - Minimize data collection
- Provide internet cafes with security software
- Schools and families can teach children safe behavior
 - Curriculum may be created by government or nonprofit initiatives



Cyberbullying

- Harassment, gossip, intimidation, impersonation
- Affects many children, with varying severity
- Often extension of conventional bullying
- Legal intervention usually overkill



What is Inappropriate Content?

- Pornographic material
- Extremist propaganda
- Scenes of violence
- Drugs and weapons
- Exploitative monetization and gambling
- Other age-inappropriate material



How May Blocking Be Managed?

- Blanket ban on objectionable content
 - Pros: Straightforward, affects everyone
 - Cons: Affects everyone
- ISP-mediated
 - Pros: Allows opt-in bypass
 - Cons: Privacy-compromising, technical age verification methods flawed
- SIM card registration
 - Pros: Age verification attaches to an in-person step of getting online
 - Cons: Only works with phones, creates black market in adult SIM cards



Is Content Blocking Wise?

- “Think of the children” can be used as an excuse for censorship and repression
- Innocuous content will get blocked
- Reasonable to limit predatory monetization models
- Families have a role in guiding children’s exposure



Right to Be Forgotten

- Right to Be Forgotten element of GDPR
- Lets users have truthful but embarrassing content about them no longer appear in searches
- Well-justified for actions of youths



Best Practices

- CSAM: Ghanaian ISPs should remove CSAM where found and report to international organizations. Laws should not penalize as CSAM people close in age sending explicit photos of themselves to each other.
- Grooming: Spread awareness of threats from grooming and ways to report. Train parents and teachers to detect signs, and prioritize protecting victims over bringing groomers to justice.



Best Practices

- Information Privacy: Require parental permission for data collection of people <13, report international violators to EU or US.
- Cyberbullying: Ban revenge porn, educate parents and teachers about supporting kids who are victims of cyberbullying.

Best Practices

- Content blocking: Generally do not block content, except possibly prohibiting exploitative monetization. While some content may be inappropriate for children, content blocking methods ban too much and too little.
- Right to Be Forgotten: Establish a right to be forgotten for actions done by kids and teens.