

Proposals for Protecting Children and Young People Online in the next Programme for Government

March 2020

**Barnardos, Children's Rights Alliance, CyberSafeIreland,
Dublin Rape Crisis Centre, One in Four, ISPCC, SpunOut**

Introduction

The Internet has revolutionised the modern world, and in turn, the lives of children worldwide; the reality is that they make up one third of global online users.¹ Whilst it brings unparalleled opportunity to children to learn, create, connect and socialise it also brings unparalleled risk, including the loss of personal data, exposure to harmful content, cyberbullying, negative impacts on health, well-being, online grooming and extortion. Most children and young people accessing the digital world have enjoyable and positive experiences. They use the online world to maintain friendships, have fun, support their education and learn about their world. At the same time, the digital world can pose serious threats to the development and protection of children and young people. Online safety is a key child protection issue for our time.

The next Government must act to make the online world safer for children and young people. It is also important that children and young people are educated and empowered to help them stay safe online. As they negotiate the new Programme for Government, we are calling on the parties to put online safety at the top of their agenda by: (1) establishing a Digital Safety Commissioner; (2) ensuring that digital citizenship, digital rights and online safety are central to the next Children and Young People's Strategy; (3) introducing a comprehensive digital literacy programme in formal and non-formal education at both primary and post-primary level; (4) investigating and prosecuting online crime and (5) limiting children and young people's exposure to content risks online.

¹ Unicef (2017) *Children in the Digital World*, at 1
https://www.unicef.org/publications/files/SOWC_2017_ENG_WEB.pdf

1. Establishment of a Digital Safety Commissioner

The Issue: Currently online service providers are subjected to very little regulation and tech is a fast-paced industry where products are developed and launched all the time. Consistently new services are being provided that have implications for children and young people's safety and privacy. Children, young people, their parents and carers tell our organisations how they experience difficulty in having bullying or harassing content removed online. We also know that there are long-term consequences for children and young people as a result of content that is published online such as material promoting eating disorders and self-harm as well as images that are shared on a consensual and non-consensual basis. Children deserve to be able to enjoy all of the learning, recreational and social benefits of being online. Whilst other stakeholders such as parents and government departments have a key role in ensuring safety online for children, the onus should also be on the tech industry and providers to ensure the internet is a safer space for all.

Research commissioned by the Irish Society for the Prevention of Cruelty to Children (ISPCC) found that 73 per cent of parents did not think the Government was doing enough to keep children safe online and 78 per cent felt that the industry was not doing enough.² Self-regulation of the industry can result in inconsistent standards being applied and data from CyberSafeIreland (2020) reveals that there are high numbers of children under the age of 13 on social media platforms despite current age restrictions. There is also a lack of proper remedies available to children and young people where they feel they have not been treated fairly by an online service provider. There is no independent body with legal powers to accept complaints to enforce rules to keep children safe online.

What the Political Party manifestos say

Fianna Fáil Establish a new Digital Safety Commissioner. The Commissioner's general function would be to promote digital safety, including an important educational role to promote positive digital citizenship among children and young people, in conjunction with the Ombudsman for Children and all the education partners. The cost of this new office will be €9.6m based on the Australian example.

Work at EU level and through our Digital Safety Commissioner to place a Duty of Care on online providers to ensure adequate protections are put in place to prevent children from accessing unsuitable sites such as pornography and gambling.

End 'Loot Box' gambling. Children are being drawn into gambling through online video games that use loot boxes. We will empower the new regulator to tackle this insidious practice.

Fine Gael In 2020, we will enact a new Online Safety and Media Regulation Bill to place new requirements on online services to comply with binding Online Safety Codes made by the Online Safety Commissioner. Each Online Safety Code will set out the steps online services must take to keep their users safe

² Hand, K, 2018 unpublished.

	<p>online, in relation to a particular issue. Codes will address a wide range of matters, including:</p> <ul style="list-style-type: none"> • Combating cyber bullying material and material promoting eating disorders, self harm and suicide. • Ensuring that services operate effective complaints procedures, where people can request that material is taken down. • Ensuring that advertising, sponsorship and product placement are not harmful and that they uphold minimum standards. • Ensuring effective takedown measures. Online services will be legally obliged to abide by the codes that apply to them. <p>The Online Safety Commissioner will be part of a new Media Commission, which will replace the Broadcasting Authority of Ireland and will also take on the role of regulating the audio visual sector. The commissioner will have a range of strong powers to police the new law.</p> <p>We will task the new Online Safety Commissioner with developing a research programme led by internationally recognised experts to review the existing and developing literature in relation to the consequences, benefits and potential harms to children primarily of digital activity.</p>
Green Party	Work to introduce a legally binding duty of care on large online platforms to put the well-being of people at the heart of decision-making processes.
Labour Party	Labour will introduce new safeguards to protect young people from abuse and discrimination, including online. Labour will continue to press for its Harassment and Harmful Communications Bill 2017 (“Coco’s Law”) to be enacted, to update the law to include harassment and bullying on the Internet, mobile phones and social media. We will also introduce adequate regulation and enforcement of online platforms to ensure that harmful content intended to promote suicide, self-harm and eating-disorders, and other related material, is promptly removed.
Sinn Féin	<p>Sinn Féin commits to the creation of an Office of a Digital Safety Commissioner and roll-out of a National Strategy on Children’s Cyber Safety. The office would enforce a code of practice and National Digital Safety Standards on digital service providers as well as establishing an Advisory Committee, 50% of which would be drawn from Civil Society, youth and children’s groups.</p> <p>Sinn Féin priorities: Create an Office of a Digital Safety Commissioner and roll out a Strategy on Children’s Cyber Safety.</p>
Social Democrats	<ul style="list-style-type: none"> • Supporting the roll out of the new Digital Rights Commission. • Enacting legislation to reflect the Law Reform Commission’s recommendations in its publication, “Report on Harmful Communications and Digital Safety”.

- Legislate to address online harassment such as revenge porn and hate speech.
- Much better public awareness campaigns for parents and children on on-line safety issues and digital wellbeing.

There is clearly general consensus among the political parties for the need to establish a Digital Safety Commissioner in the next Programme for Government. The Law Reform Commission (LRC) (2016) recommended establishing a statutory Digital Safety Commissioner, modelled on comparable offices in Australia and New Zealand. The LRC also envisioned that this office would have a role in promoting digital safety and positive digital citizenship among children and young people. Building on the current non-statutory take down procedures and standards in the online/digital sector, the Digital Safety Commissioner would have responsibility for publishing a Code of Practice on Digital Safety which would include an efficient take-down procedure. If a social media site did not comply with the standards in the Code of Practice, an individual could then appeal to the Digital Safety Commissioner, who could direct a social media site to comply with the standards in the Code. The LRC also recommended that if a social media site did not comply with the Digital Safety Commissioner's direction, the Commissioner could apply to the Circuit Court for a court order requiring compliance.

The Government recently published a General Scheme of the Online Safety Media Regulation Bill 2019. Its purpose is to replace the Broadcasting Authority of Ireland with a Media Commission. While one of the objectives of the Commission is to 'protect the interests of children taking into account the vulnerability of children to harmful content and undue commercial exploitation' [Head 9(4)], the Scheme of the Bill does not specify that one member of the Commission will be an Online Safety Commissioner. It appears that this is to be determined by the Commission itself upon establishment.

The Scheme of the Bill provides that the Commission will conduct public information campaigns for the purpose of educating and providing information to the public in relation to online safety and media literacy. However, the Scheme does not follow the Law Reform Commission's recommended approach in providing a mechanism for individuals to appeal to the Commissioner when a social media site fails to comply with the standards of the Code of Practice on Digital Safety. Instead, the Bill provides for a 'systematic complaints scheme' at Head 52(b) or 'super complaints' (explanatory note at Head 52) that is designed for nominated bodies, such as expert NGO's, to bring systematic issues to the attention of the Commission, an example of which could be providers that have a vast number of complaints against them. This Bill provides for the Commission to have the power to audit the complaints handling system of a service provider (Head 52A) and direct them to take specified actions which can include changes to their systems or the take down or restoration of content.

In our view, the publication of the General Scheme of the Online Safety Media Regulation Bill 2019 is a step in the right direction. However, it needs to be amended to specifically provide for the establishment of an Online Safety Commissioner as part of the Media Commission. The Commissioner must be adequately resourced, with appropriate ring-fenced funding and staffing, and granted robust statutory powers to sanction companies who do not comply with timebound codes for the protection of children and young people online. It would also need to be amended to provide for an ordinary complaints mechanism to ensure

that vulnerable children and young people whose rights are not respected by the online/digital sector have access to a remedy.

Programme for Government Ask: Within the first 100 days publish a Scheme of a Bill providing for the establishment of a Digital Safety Commissioner.

The Cost: Fianna Fáil estimates that it will cost in the region of €9.6 million following the Australian example.

2. Ensure that digital rights and online safety are central to the next Children and Young People’s Strategy

The Issue: Faced with the rapid advances in technology, there is a danger that national policy making can become very reactive and fragmented. Policy in this area can also be too focused on protecting children from online abuse and overuse without considering the benefits of the digital age which children have an equal right to access. The last Government launched an *Action Plan for Online Safety 2018*. However, we need to build on this Action Plan and adopt a national overarching policy dealing with this area.

What the Political Party manifestos say	
Fianna Fáil	Establish a new Digital Safety Commissioner. The Commissioner’s general function would be to promote digital safety, <u>including an important educational role to promote positive digital citizenship among children and young people</u> , in conjunction with the Ombudsman for Children and all the education partners.
Fine Gael	<p>The ‘Action Plan for Online Safety’ was published in 2018 and the actions contained in it cut across six government departments – underlying the range and breadth of the issues involved. Through this Action Plan the government will work with stakeholders to implement actions, over an 18 month period, that are achievable and which will have the greatest impact on online safety for everyone in Ireland. Among the actions are:</p> <ul style="list-style-type: none"> • Creating a National Advisory Council on Online Safety to provide advice to government on online safety policy issues with stakeholder input and engagement; • Legislation for new online criminal offences; • A national communications campaign and single identity – Be Safe Online – with key online safety messages targeted at specific groups, including children and young people; parents, guardians and teachers; and • The creation of a single online access point through which all available Online Safety resources can be accessed.
Sinn Féin	Roll out a Strategy on Children’s Cyber Safety.
Social Democrats	Developing a new National Strategy on Children’s Cyber Safety and Online Bullying.

The new Government will be formed at a critical time as it will be tasked with developing the next National Children and Young People’s Strategy in 2020. This is because *Better Outcomes, Brighter Futures: The Policy Framework for Children and Young People* will finish in December 2020. The last Strategy did not deal sufficiently with the area of digital rights and online safety because the digital landscape was very different. Building on the work of the Action Plan for Online Safety, we need a more joined-up, strategic and ambitious approach to protecting and empowering children in Ireland online. Digital rights and online safety must be central to the next Children and Young People’s Strategy and address through

a coordinated cross-departmental approach the pressing issues that are impacting on children today. Including dealing with infants' access to digital devices that is harmful and providing access to digital resources to support children's development.

The Programme for Government Ask: Ensure that digital citizenship, digital rights and online safety are central to the next Children and Young People's Strategy and establish a dedicated implementation team and budget.

The Cost: No specific cost.

3. Introduce a comprehensive digital literacy programme in primary and post primary schools

Problem: Children, some as young as eight, have unsupervised access to the internet through a wide usage of smart and gaming devices and some rarely discuss what they are accessing with a parent or guardian (CyberSafeIreland Annual Report, 2017). This can result in children being exposed to grooming or sexual exploitation and inappropriate content such as pornography, extreme dieting and self-harm websites. If children and young people do not have the knowledge and skills to cope with that they are seeing online, this can have devastating consequences. The UN Committee on the Rights of the Child has recommended that States should “address the risks posed by digital media and [information and communication technologies] to the safety of children, including online harassment, sexual exploitation of children, access to violent and sexual content, grooming and self-generated sexual content’ by adopting ‘holistic strategies’ (2014, General Day of Discussion, OHCHR). Children and young people themselves also need to understand the impact of their own behavior online and how it can cause harm to other children when they engage in bullying and other behaviours.

What the Political Party manifestos say	
Fianna Fáil	The [Digital Safety] Commissioner’s general function would be to promote digital safety, including an important educational role to promote positive digital citizenship among children and young people, in conjunction with the Ombudsman for Children and all the education partners.
Fine Gael	<p>We will:</p> <ul style="list-style-type: none"> • enable the teaching of computer science at Leaving Certificate to all schools that want it; • integrate coding and computational thinking into the curriculum; and • allow every school to integrate digital technology into learning where it can improve the capacity of students to learn. <p>€420m investment in digital facilities [in schools] over the next decade.</p>
Green Party	Promote the education of children about online safety, what their data rights are, and why it’s important.
Sinn Féin	Sinn Féin believe it is essential all children benefit from a basic standard of digital literacy and education at both primary and secondary level schools is pivotal to this. We also believe every school needs a digital champion, an appointed a teacher or principal, who can lead on policy development, support and delivery of digital literacy and digital wellbeing education to children, parents, and teachers.
Social Democrats	Much better public awareness campaigns for parents and children on an on-line safety issues and digital wellbeing.

The solution is to start with educating and empowering young people to understand their rights in the digital world, the legal consequences of their online activities and the impact of extensive use of the internet and to change behaviours. We know that supporting children to develop critical skills can help them to protect themselves from safety and data protection threats. We also know that developing their technical skills can also help them understand how to use online tools and remedies to protect themselves.

Criminalising children and young people for dangerous behaviour online needs to be a measure of last resort. We also need to educate and empower children and young people to act differently in future. Relatable online safety education must be delivered through the curriculum on a regular basis at both primary and –post-primary level. Presently there are a myriad of programmes being delivered around the country but there is not one core curriculum in our schools. Providing a standard approach in the form of a comprehensive digital literacy programme, could be an important step in addressing this gap. This programme should be delivered in parallel to an updated Relationships and Sexual Education syllabus, which would reflect what children and young people might be seeing online including helping them to deal with the vast amounts of pornography that they are exposed to. The education and empowerment of children to become civic online citizens is the ultimate goal for which to strive.

Programme for Government Ask: Develop a digital literacy curriculum for formal education (primary and secondary schools) and non-formal education (youth work settings) and implement nationally over the lifetime of the Government.

The Cost: €1,000,000

4. Investigating and prosecuting online crime

The Issue: The production and distribution of child sexual abuse and exploitation materials – whether in print, online, or live-streamed – represent a fundamental violation of children’s rights. These images effectively represent a crime scene and people accessing these images directly contribute to the exploitation of child victims because they create demand. Viewing images is in itself child abuse and according to One in Four, those accessing images of child sexual abuse can go onto commit direct sexual offences against children.

There has been an explosion in new cases involving images of child sex abuse from 116 in 2016 to 392 in 2018. However, cases involving distribution of child abuse material are taking up to 10 years for the State to complete, with the problem deteriorating in the last year.³ These delays are caused by a number of factors including the number of devices which need to be seized, a lack of Garda capacity to deal with devices with sophisticated encryption,⁴ delays in acting on tip offs from foreign police and in sending seized devices to the bureau for examination.⁵ Delays are reported at every stage in the process including taking victim statements, arresting or interviewing suspects and sending the file to the DPP.⁶

It is unacceptable that the Gardai do not have the resources to effectively investigate and support the prosecution of these cases in a timely manner. The Online Child Exploitation Unit has responsibility for monitoring the enforcement of the provisions of the Child Trafficking and Pornography Act, 1998. It is the single point of contact for the Garda Síochána for referrals in connection with online child abuse material. It is critical that this unit is both adequately staffed as well as being promoted amongst other members of the force as well as the general public.

In addition to effectively resourcing Gardai, it is also important to make it as easy as possible for children and young people to report concerns. While all children should be encouraged to tell an adult that they trust if they have been a victim of abuse and to ask for their help in reporting it, sometimes this is not possible. Children may find it daunting to report to the Gardai face to face or over the phone without the support of a trusted adult. We believe that a review needs to be carried out to identify how young people can be supported in reporting crimes. We also believe that a public awareness campaign aimed at children, young people, their families and second-tier advice givers is also needed on how to report crimes committed against children online.

³ Conor Gallagher, *Delays to child porn inquiries put abused at further risk, cases taking up to 10 years as technological and data issues impede prosecutions*, Irish Times, 7th January 2020 available at <https://www.irishtimes.com/news/crime-and-law/delays-to-child-porn-inquiries-put-abused-at-further-risk-1.4132063> accessed on 5th February 2020

⁴ Conor Gallagher, *Backlogs a dangerous flaw in child porn and abuse inquiries Resource and Data leave prepretrator at large – and child vulnerable to further abuse*, The Irish Times 7th January 2020. Available at <https://www.irishtimes.com/news/crime-and-law/backlogs-a-dangerous-flaw-in-child-porn-and-abuse-inquiries-1.4132041> accessed on 5th February 2020

⁵ *ibid* at 9 “A report from the Garda Inspectorate, published in February 2018, stated it could take up to a year for gardaí to act on tip-offs received from the force’s child exploitation intelligence unit.”

⁶ Report of the Garda Síochána Inspectorate, Responding to Child Sexual Abuse, A Follow Up Review from the Garda Inspectorate (Garda Inspectorate, December 2017)

The criminal law is not fully equipped to respond to some of the harmful online behaviour that people engage with. The Law Reform Commission in its 2016 Report on Harmful Communications and Digital Safety⁷ identified that while existing criminal law already address some of types of harmful communication, there are some gaps where new forms of communication have been used in harmful ways that could not have been anticipated previously. In May 2019, Minister Flanagan secured Government approval to draft amendments to the Harassment, Harmful Communications and Related Offences Bill 2017 brought forward by Deputy Brendan Howlin.⁸ The Bill is based on the recommendations of the Law Reform Commission and proposes new offences to deal with ‘revenge porn’, the non-consensual distribution of intimate images, ‘upskirting’, online harassment and proposes to amend certain offenses under the Non- Fatal Offences Against the Person Act 1997 to take into the use of online communications. We believe criminal law needs to catch up with the digital age to empower Gardaí to prosecute harmful online behaviour.

What the Political Party manifestos say

Fianna Fáil Over the past six years there has been an increase of up to 64% in internet based offending yet there is no legislation to allow An Garda Síochána to seek a password from an alleged offender to search his /her computer for illegal images. Fianna Fáil will be bringing forward legislation to address this glaring gap in the criminal law legislation.

There are no official proactive measures in Ireland to catch people seeking to groom children online. The Garda Cyber Crime Bureau, which was established in September 2016, does not have the resources to proactively go after these predators. There is a lack of manpower in terms of Gardaí assigned to trying to catch child abusers grooming and exploiting children online. The Gardaí need to be resourced so that they can police the internet as they do the streets. The internet has made child grooming much easier for offenders – but it should also be used as a tool to stop them before they harm anyone.

Poor broadband in the Garda Cyber Bureau is impacting on the ability of the Gardaí to examine and download potential evidence from computers, phones and other technology devices seized. This, along with broader issues in relation to technology available to An Garda Síochána needs to be addressed without delay.

Resource An Garda Síochána so that they can police the internet as they police the streets.

⁷ Law Reform Commission, *Report on Harmful Communications and Digital Safety* (LRC 2016)

⁸ Merrion Street, ‘Minister Flanagan secures Government approval for amendments to the Harassment, Harmful Communications and Related Offences Bill’ Press Release 1 May 2019.

Fine Gael	We recognise that criminals increasingly exploit technology and we will ensure that members of An Garda Síochána are appropriately equipped and trained to tackle all forms of criminality.
Green Party	Increase Garda capacity for dealing with online crime.
Labour Party	Labour will review international attempts to control child and young people's access to inappropriate material on the Internet, and we will introduce controls in Ireland that have been shown to work and to benefit children and young people.
Sinn Féin	Increase Garda numbers to 16,000. Cost - €142 million
Social Democrats	Improve training and capacity for the Gardaí to more effectively tackle online crime.

Programme for Government Ask:

- In the first 100 days of the new Government, conduct a review of resources required by the Gardai to investigate crimes involving images of child sex abuse and earmark sufficient funds to reduce detection/investigation times.
- Introduce the Harmful Communications Bill to create new offences for the digital age.
- Carry out a review to determine how to provide better supports to young people to report online crimes and introduce a new public awareness campaign aimed at children, young people, their families and second-tier advice givers on how to report crimes committed against them online including grooming, coercion, threats and harassment and where to seek support for same

The Cost: To be determined in the review.

5. Limiting children and young people's exposure to content risks online

The Issue: Unicef define 'content risks' as situations where 'a child is exposed to unwelcome and inappropriate content. This can include sexual, pornographic and violent images; some forms of advertising; racist, discriminatory or hate-speech material; and websites advocating unhealthy or dangerous behaviours, such as self-harm, suicide and anorexia'.⁹ While content risks can cause distress and harm to a child, this will depend on the individual child, the content and how vulnerable they are.¹⁰ EU Kids Online published a study in 2013 involving nearly 10,000 children. Pornography (22 per cent) and violent content (1 per cent) were top of children's online concerns, with younger children more likely to be disturbed.¹¹ A recent EU Kids Online survey also reported that 1 in 5 teenagers in Ireland had viewed sexual images either online or offline in the last year.¹²

A complete review of ISPCC case work conducted over the 18 months up to June 2016 produced clear findings in this area. In over one third of the cases the ISPCC worked with in that period, there was some form of online risk to the children involved. Children as young as six years of age were reported to be viewing inappropriate material, with the Childline service reporting growth in the number of contacts from children stating they regularly watched pornography. Some children described what was happening while speaking to Childline.

The Dublin Rape Crisis Centre (DRCC) has also encountered young people who are learning attitudes and behaviours from the world of pornography where problematic messages about gender, power, pleasure, body image, consent, sexuality, sexual identity and sex are portrayed. Not all young people have the capacity to critically decipher these messages and therefore some are internalised affecting the way young people think, react and behave. When DRCC's education team were researching the 'Get Real' module of the BodyRight programme that includes media, popular culture and pornography what they found was that young people are developing unrealistic expectations about themselves, their relationships and sex.

⁹ Unicef (2017) *State of the World's Children*, at 72, https://www.unicef.org/publications/files/SOWC_2017_ENG_WEB.pdf

¹⁰ Sonia Livingstone (2012) 'Children and online pornography – does the evidence justify more calls for regulation?', <https://blogs.lse.ac.uk/politicsandpolicy/online-pornography-regulation-livingstone/>

¹¹ Livingstone, Kirwil, Ponte, Staksrod with EU Kids Online (2013) "In their own words: What bothers children online?", *EU Kids Online*, <https://www.lse.ac.uk/media@lse/research/EUKidsOnline/EU%20Kids%20III/Reports/Intheirownwords020213.pdf>

¹² O'Neill, Grehan & Olafsson, (2011) "Risks and Safety for Children on The Internet: The Ireland Report", *EU Kids Online*, <https://arrow.tudublin.ie/cgi/viewcontent.cgi?article=1022&context=cserrep>

What the Political Party manifestos say

Fianna Fáil	Work at EU level and through our Digital Safety Commissioner to place a Duty of Care on online providers to ensure adequate protections are put in place to prevent children from accessing unsuitable sites such as pornography and gambling.
Social Democrats	Enacting legislation to reflect the Law Reform Commission’s recommendations in its publication, “Report on Harmful Communications and Digital Safety”.

Limiting children and young people’s exposure to content risks online must be a key commitment in the next Programme for Government. However, addressing this issue is complex and requires a considered response. The Council of Europe Recommendation on the rights of children in the digital environment calls on States to: ‘require effective systems of age-verification to ensure children are protected from products, services and content in the digital environment which are legally restricted with reference to specific ages, using methods that are consistent with principles of data minimisation’.¹³ To date age verification has been challenging as many children are able to bypass restrictions and attempts in other countries to introduce content blockers have not worked to date.¹⁴ Age verification may however be more feasible into the future when the right technology is developed.

Educating children and young people on how to protect themselves from harmful content online is key, together with developing their competencies to distinguish positive and negative models of sexual relationships from the pornography that they watch. At the same time, there are also blockers and filters that can be applied to services and devices by mobile providers and online platforms. Parents can also be educated on how to introduce filters onto devices at home. However, the challenge here is what will happen to a child or young person where the parent does not have the knowledge or capacity to take these steps?

We believe that the incoming Government can address these issues by commissioning independent research to identify the most effective way to limit children’s exposure to content risks online. This can shape the actions the Government might take into the future and inform the Government’s leadership on this issue internationally at the EU level.

Programme for Government Ask: In the lifetime of the Programme for Government, commission independent research to identify the most effective way to limit children’s exposure to online content that is harmful to them, including pornography.

Cost: Approximately €80,000.

¹³ Recommendation CM/Rec(2018)7 ‘Guidelines to respect, protect and fulfil the rights of the child in the digital environment’, <https://rm.coe.int/guidelines-to-respect-protect-and-fulfil-the-rights-of-the-child-in-th/16808d881a>

¹⁴ The Guardian, 16 October 2019, ‘UK drops plans for online pornography age verification system’, <https://www.theguardian.com/culture/2019/oct/16/uk-drops-plans-for-online-pornography-age-verification-system>