

Children and Young People: Managing their Participation Online

Issued: 11 April 2011

Status of Guidance Note

This Guidance Note, authorised by the Managing Director, is provided to assist interpretation of the Editorial Policies to which the Guidance Note relates. Guidance notes provide advice to assist in the interpretation of the Editorial Policies, which contain the standards enforceable under the ABC's internal management processes and under the ABC's complaints handling procedures.

It is expected that staff will normally act in accordance with the advice contained in Guidance Notes. In a given situation there may be good reasons to depart from the advice. This is permissible so long as the standards of the Editorial Policies are met. In such situations, the matter should ordinarily be referred upwards. Any mandatory referrals specified in Guidance Notes must be complied with.

Key Editorial Standards

Excerpts of key editorial standards relevant to this Guidance Note are set out below. Other editorial standards may also be relevant, depending on the specific circumstances applying in each case.

8 Children and young people

- 8.1 Take due care over the dignity and physical and emotional welfare of children and young people who are involved in making, participating in and presenting content produced or commissioned by the ABC.
- 8.2 Before significant participation of a child or young person in content produced or commissioned by the ABC, or in interactive services offered by the ABC, consider whether it is appropriate to obtain the consent of both the child/young person and the parent/guardian.
- 8.3 Adopt appropriate measures wherever practicable to enable children and young people, or those who supervise them, to manage risks associated with the child/young person's participation with, use of and exposure to ABC content and services designed for them.
- 8.4 Take particular care to minimise risks of exposure to unsuitable content or inappropriate contact by peers or strangers.

Mandatory referral

The decision to create an ABC children's presence on a third party social media site must be referred to an appropriately senior ABC person designated for the purpose.

Introduction

The ABC aims to provide children with enjoyable and enriching online content as well as opportunities for them to express themselves safely. In doing so, the ABC must ensure that children are not unnecessarily disturbed or distressed as either contributors to or consumers of content.

Scope of this Guidance Note

This document provides guidance about the management of children's participation on ABC-managed online spaces, including abc.net.au websites and third party sites, which are specifically designed for children and/or based around children's content.

For the purposes of this guidance, a child or young person is an individual under the age of 18.

Privacy and protection of children

The online protection of children is a shared responsibility between the ABC, the parent/guardian and the child. The ABC aims to ensure that children and young people who engage with our online spaces understand the possible risks they face and how to minimise them. Providing information about online safety is encouraged on ABC sites designed for children.

8

We should be careful about how much personal information we collect, reveal and retain about children anywhere on ABC sites as publication of too much information may put a child at risk. The main consideration is the protection of a child's identity (no full name), contact details or locations (no address, email, telephone, activity locations), and possibly no school reference (though there are exceptions when coming from a school-led initiative). The ABC must also be aware of the persistence of online media where aggregate profiles can form over time through the accumulation of UGC (especially when that media includes photos or video where the child is featured).

It is important that young children should not get into the habit of easily revealing personal details about themselves or their family on the internet. Where we invite children to send us information about themselves, for example a name and email address to enter a competition, we should explain why we need it in language which children can understand. In keeping with the requirements under relevant privacy law, this information should be retained securely, only for as long as is needed and only be used for the purpose for which it was sent.

Consent

When the ABC invites children to participate online or provide personal contact information, as well as the child's consent we need to consider what degree of parental consent is appropriate. Depending on the nature of the contribution this might include --

- Reminding a child to ask for parental consent.
- Requiring the use of a check box to confirm that consent has been obtained before the child can proceed.
- Verifiable parental consent e.g. a signed letter or personal telephone call from a parent or guardian.

Factors to consider when deciding on the method of consent include --

- The age of the child. The younger the participant the more likely parental consent will be required.
- The developmental stage of the child or young person. Will they understand what is going to happen to their contribution or the information we want them to send?
- The type of content or interaction; does it involve text, artwork, photos, audio or video?
- The sensitivity of the information or subject matter.
- The risks associated with the contribution or information. What is the likelihood of any adverse effects for the child?
- The length of time we are publishing or storing it.
- The extent to which the content or interaction will be publicly available or promoted.

The participation and/or information we request will have varying degrees of sensitivity and may require different levels of parental involvement. For example, participation on a children's message board is unlikely to require parental consent, but their contribution to a video-based competition where the ABC needs a child's email and mobile phone number, would likely require verifiable parental consent.

If a child or parent indicates that they have revoked consent, please refer the matter to ABC Legal.

Moderation of children's UGC

In order to ensure a child's privacy is maintained and they are protected from exposure to adult themes, language, or inappropriate contact, all UGC on ABC managed children's sites must be pre-moderated.

On third party sites, UGC cannot be pre-moderated and requires a risk management approach to be adopted. This includes mandatory referral for the creation of the page, limiting interactivity and active post-moderation by trained ABC staff.

Social media and third party platforms

The ABC acknowledges that engaging with third party social media sites provides an opportunity to reach audiences who are active in these spaces but does pose some risks for children and young people.

Before creating any ABC children's content page on a third party social media site, consideration must be given to the following --

- What is the editorial purpose of the page and how does this meet with your overall editorial and promotional strategy?
- Who is the likely audience for the content and is the site suitable for them?
- Could you achieve the same effect on abc.net.au?
- What commitment are you willing to make to the site? Do you have the resources to keep it engaging, relevant and actively post-moderated by trained staff?
- How will you measure success and what is your exit strategy should the page need to be removed?

In addition, serious consideration must be given as to whether it is appropriate to create third party social media pages around content specifically designed for younger children. Children and young people do run risks on social networking sites as their technical ability often exceeds their social skills. They may be at risk from bullying or become targets for online grooming.

Most social networking sites have content rules and standards designed for teenagers and adults,. The ABC must be sensitive to the minimum age requirements mandated by particular social networking sites such as Facebook which is 13 years.

If a decision is made to create a children's page on a social networking site, consideration must be given to how risk can be managed and reduced. This may include such things as limiting contact functionality on pages, carefully scrutinising "friend" requests to check age suitability, ensuring pages are actively moderated by trained ABC staff and providing information to children and parents about safe online behaviours.

All third party social media pages should link back to content on abc.net.au.

Linking

Links from abc.net.au sites to non-ABC websites should be appropriate and relevant to the content, suitable for the targeted age group and generally non-commercial in nature. Any links from dedicated children's spaces on abc.net.au to sites that are designed to sell commercial products to children under 13 years should not be included.

A brief user advice notice may be required between a link and the external website stating that the user is now leaving the ABC and we are no longer responsible for the content.

There should be no direct links from ABC children's pages to third party social networking sites, even if they are to children's pages. Where an ABC page is designed for teenagers, there may be exceptions.

In general, links within children's UGC contributions will not be posted.