



Children's Code Focus Groups and Peer-to-Peer Research

November 2021

Executive Summary: Focus Groups and Peer-to-Peer Reports	4
Headlines	4
Low Awareness and Recognition of the ICO and the Children’s code	4
Key Takeaways	4
Introduction	5
Background	5
About Parent Zone	5
About VoiceBox	5
About this report	6
Focus Groups - Details	7
Overview	7
Parents Focus Group - Respondents Summary	7
Young People Focus Group - Respondents Summary	8
Focus Groups - Summary	9
Awareness and Recognition of the ICO and the Children’s code	9
Understanding of data and related concerns	9
Scenarios that have prompted seeking help or caused concern	9
Addressing risks	9
Experience and expectations around seeking help	9
Our Insights	11
The threshold for seeking help is high	11
The parents and young people we spoke to gave largely similar responses but parents and young people had different views of risk	11
Using scenarios to aid discussions about data privacy works	11
There is almost no awareness of children’s rights online	12
Speed and ease are the most important factors if complaining	12
Focus Group Findings - In Detail	13
Awareness and Recognition of the ICO and the Children’s code	13

Parents responses	13
Young peoples' responses	13
Understanding of data and related concerns	13
Parents responses	13
Young peoples' responses	14
Scenarios that have prompted seeking help or caused concern	15
Parents responses	15
Young peoples' responses	16
Experience and expectations around seeking help	18
Parents responses	18
Young peoples' responses	19
Recommendations	21
Raising Awareness	21
Simple path to complaining	21
A process for responding to complaints	21
Ongoing support	21
VoiceBox report on Peer-to-Peer Research	22
Introduction	22
Introduction	24
Summary of key findings	24
Awareness of the ICO and the Children's code	24
Understanding of data	24
Data related concerns	25
Concerns about specific apps and platforms	25
Complaints process	25
Expectations around seeking help	25
Findings	26
Were they aware of the ICO and the Children's code?	26
What do we mean by data?	26

Concerns about data sharing/collection	28
Concerns about specific apps or platforms	31
Complaining about Data collection and storage	33
Complaining to the ICO	34
Postcodes of those interviewed	36

Executive Summary: Focus Groups and Peer-to-Peer Reports

Headlines

- 1 / 31 participants (including focus groups and peer-to-peer groups) had heard of the Children's code
- All 31 participants had directly or indirectly experienced concerning scenarios online relating to their data, and many could give several examples of this.
- Young people and parents, although concerned about their data and actively taking steps to protect themselves online, are unlikely to complain to an online platform.
- No respondents who had complained to a platform had had a wholly positive experience of doing so, and all participants offered suggestions of what they felt a good complaints experience would look like.

Low Awareness and Recognition of the ICO and the Children's code

Given the extremely low awareness of both the ICO and the Children's code, it is possible to conclude that presently the Children's code and complaints process cannot fulfil its function for young people and their parents or carers.

Key Takeaways

The key takeaways from both the focus groups and peer-to-peer research is that there is interest amongst both parents and young people around the Children's code, but that more and clearer information is needed to help frame their perceptions of what is acceptable and what should be reported.

Children and young people are actively taking steps to protect themselves and their data online, but find this difficult, and often ineffective in reducing instances of concerning incidents. The implementation of the Children's code may help address the frequency of incidents in the long term but there was no clear indication of its impact in the focus groups. In terms of a complaints and reporting procedure, the speed and ease of the process is crucial to how likely parents and young people are to potentially complain.

“you’re not going to complain that your rights aren’t being upheld if you don’t know they exist”

1. Introduction

Background

As part of the code of practice on standards of age appropriate design (the Children’s code), the ICO commissioned Parent Zone and VoiceBox to facilitate two focus groups with children / young people (aged 14+) and parents to identify the types of issues or questions that they would likely seek guidance on or complain about related to children’s data protection rights and the Children’s code.

The focus groups also explored:

- Whether young people are likely to complain to online services, or the ICO, independently or through their parents
- What their experience of complaints has been to date
- What systems they would like online services and / or the ICO to put in place to make it easier for them to exercise their rights.

Alongside the focus groups, VoiceBox engaged their youth ambassadors to run related consultation activities with their peer networks to get further insights from a broad range of children and young people.

About Parent Zone

Parent Zone’s mission is to ensure that children grow up in an environment that allows them to flourish. Our experience includes research, consultation and the delivery of large scale projects for governments, charities and corporates. With a broad network of parents and professionals we have unique reach and influence, and extensive experience in consulting with parents and carers.

About VoiceBox

VoiceBox is a youth-led organisation that works to amplify the voices of young people. Their expertise is in gathering insights from young people; carefully listening to what they have to say and creating a space where they feel encouraged to share their honest opinions and thoughts.

About this report

The first report in this document relates to the focus group research conducted by Parent Zone, working in close partnership with VoiceBox, on behalf of the ICO. The second report covers the peer-peer research undertaken by VoiceBox ambassadors, and written by VoiceBox for Parent Zone.

The Focus Groups report begins with an overview of the process undertaken to gather the information requested, as well as a summary of the participants of the focus groups, with more information included about the adults that took part. The parents were a diverse group in terms of geography, profession, age and digital confidence, but interestingly were generally very aligned in terms of their responses.

This first report includes a short summary of the responses to the questions asked in the focus groups, but also includes detailed answers and quotes from the sessions. We have also included our key insights from across the two focus groups, to add context and depth to the initial findings.

A summary of the peer-to-peer research activity conducted by VoiceBox is included after the focus groups report. This section was produced by VoiceBox and includes detail on their approach, observations and insights gathered.

The two complimentary reports are combined for ease of access and to facilitate cross reading between the two strands of work.

2. Focus Groups - Details

Overview

We conducted two focus groups, with eight parents, and seven young people, selected from a range of backgrounds and geographies. Each focus group lasted 60 minutes, and started with a general conversation to gain an understanding of the participants' recognition and understanding of ICO and The Children's code, before more specific questions around data concerns, complaints and experiences. Participants were asked to undertake light touch pre-work by thinking about when they'd had concerns around their children's data or online experiences. All participants were paid for their time and offered follow up support if they wanted it.

In both focus groups the facilitator used three scenarios, created by the ICO, to aid the discussion with participants. The below scenarios are what was presented in the parents focus group, and were reframed for young people in the youth focus group. The three scenarios were:

1. Your child starts to receive content on a streaming site that is harmful (eg pro-self harm), after they made a search online for depression support counselling.
2. Your child receives unwanted friend requests from people they don't know, some of which look to be from adults. The terms and conditions of the service are too long and complicated to understand if this should be happening.
3. Your child has registered for a free online game. They keep getting notices saying that they can get extra tools if they agree to receive targeted advertisements. They can't get past a current level and think that you must agree to the nudge in order to progress. You don't think this is fair.

Parents Focus Group - Respondents Summary

Parent	Parent	Children	Occupation	Age	Postcode / area
Parent 1	Mother	Boy: 15	Cleaner	54	SK5
Parent 2	Mother	Girl: 12, Boy: 14		35	OL16
Parent 3	Mother	14, 15	Receptionist	50	B23
Parent 4	Father	Boy: 14	Plumber	46	Ilford
Parent 5	Father	Girl 14, Girl: 16	Engineer	48	B93

Parent 6	Father	Boy: 14, Boy: 18	Manager	48	HA3
Parent 7	Mother	Girl: 13, Girl: 15		48	WA14
Parent 8	Mother	Girl: 8, Boy: 12	Social worker	41	L17

Young People Focus Group - Respondents Summary

Participant	Age	Postcode / area
Young person 1	21	SW17
Young person 2	22	SW17
Young person 3	17	WD18
Young person 4	23	W2
Young person 5	17	WA8
Young person 6	21	E8
Young person 7	24	UB8

3. Focus Groups - Summary

Below is a summary of the key findings from our focus group. Each discussion area is explored in more detail later in the report.

1. Awareness and Recognition of the ICO and the Children's code

Few parents had heard of the ICO and could approximately describe what it does, but no young people. No participants had heard of the Children's code.

2. Understanding of data and related concerns

Parent and young participants gave similar responses, although parents talked more about what data meant to them. The concerns shared were closely aligned across both focus groups, although parents talked more about financial concerns online (e.g. a card being linked to a gaming account), whilst young people discussed being tracked online and receiving unwanted friend requests and emails.

3. Scenarios that have prompted seeking help or caused concern

All of the participants related to the scenarios presented to them. All parent participants (or their children) had experienced at least one of the scenarios, and many had experienced all three. Most of the young people had experienced all three scenarios and although they were shocked and 'creeped out' by these experiences they had also become their reality.

4. Addressing risks

The majority of the young people we spoke to were cynical about both the platforms and the complaints processes in general, and discussed actively taking it upon themselves to improve their privacy online. Action taken included googling solutions, deleting accounts, marking emails as spam, setting up two-factor authentication and providing fake information. Providing fake information, in turn, will negatively affect the age verification process in place to protect young people online.

5. Experience and expectations around seeking help

Currently, none of the parents we spoke to would make a complaint to the ICO, because they didn't have awareness of the ICO, the Children's code or the complaints function. If, in the future they were making a complaint to the ICO, both parents and young people agreed that the priority for them would be that it is quick, simple and that their

expectations are managed. Young people wanted their complaint recognised and they needed to feel confident that the complaints process worked.

Both focus groups also stressed that a campaign to highlight what their rights are, and to direct them towards the ICO to complain would be beneficial.

4. Our Insights

Please find below some insights offered as a cross-read on the focus-group findings, based on Parent Zone's broader understanding and context of working with children and families in this space.

1. The threshold for seeking help is high

All participants across both groups gave examples of incidents online which were high risk, inappropriate or harmful. However, only three participants had ever sought help as a result. Worrying interactions or data concerns online are normalised to all of the participants, and help seeking by adults is most likely when the concern is related to money or unauthorised spending online. Young people wanted support but they didn't know where or how to get help, especially from somewhere where they were guaranteed to be supported.

2. The parents and young people we spoke to gave largely similar responses but parents and young people had different views of risk

For the most part, parents and young people responded similarly to the questions in the focus group. The one marked difference was how parents perceived their children's understanding of risks online versus how the young people we spoke to felt. Three of the parent participants were concerned that their children didn't have fear or anxiety around their data online, and felt that they were normalised to the dangers because they'd grown up in a digital environment. The other participants agreed with this view. In fact, all of the young people spoke about their data being mis-used and despite taking many precautions there was an element of acceptance about this just being the way it is and feeling very helpless to change it. Thus the perception of parents and the reality for young people were misaligned.

3. Using scenarios to aid discussions about data privacy works

Providing participants with example scenarios was extremely helpful. It allowed both parents and young people alike to recognise and understand when they (or their children) had had concerning or unacceptable experiences with data privacy online.

4. There is almost no awareness of children's rights online

All participants stressed that they didn't know what the rights of young people (or adults) online were, highlighting children and parents rights may be a catalyst to empower more people to complain.

5. Speed and ease are the most important factors if complaining

Those who have complained to platforms have had difficult experiences. Platform complaints processes have been challenging to access, and slow, complicated and frustrating. Everyone we spoke to felt that any complaints process needs to be quick, easy and transparent. Most of the young people said that they would need to feel like their complaint has been recognised and taken seriously.

5. Focus Group Findings - In Detail

Awareness and Recognition of the ICO and the Children's code

Generally, in both focus groups, recognition of both the ICO and the Children's code was very low. None of the young people had heard of the ICO, and only one had heard of the Children's code. Three parent respondents could roughly describe what the ICO was and one guessed what the Children's code was.

Parents responses

- Three out of eight parents had heard of ICO and could roughly describe its purpose

"I heard about it in the media, like something was referred to the ICO for investigation" Parent 2

"[I know] it from changes in GDPR, had to do some online training about it at work" Parent 8

- None of the eight parents had heard of the Children's code, Parent 7 guessed:

"It's about age-appropriate content or children being able to watch certain things."

Young peoples' responses

- None of the young people had heard of the ICO prior to the focus group
- One young person had heard of the Children's code "from their mum"

Understanding of data and related concerns

Parents responses

We asked parents to tell us what data means to them and their family.

- Multiple parents responded that data related to almost everything in their lives, and was very valuable to them - the term 'data' makes them think of their finances, their social media accounts, their children's gaming, and includes their professional lives too.

"data is everything and anything, it's open-ended" Parent 4

- In regards to their children's attitudes, some parents felt that their children were aware of risks around data, but they did not hold the same fear or anxiety around the risks as their parents. Parents expressed concern that growing up with digital technology and learning about data security in school meant that children have a good understanding, but that the risks were normalised to them and therefore not taken as seriously as by their parents.

“because they're a digital generation - they don't have the fears and reservations that we share because we were born before all of these things existed.” Parent 8

- With regards to their children's activity, concerns raised were largely around things that were 'tempting' online - for example free trials where you have to register or give credit card details to access them. Parents were concerned that their children were accessing these spaces online, not realising that this was sharing data, and could lead to a cost for their parents.

“there's so much temptation, asking for information without children understand what's behind it - it's the scary side” Parent 7

- A key concern for parents was that the parents' own data could be compromised through their children's accounts being linked to their parents email address, or using a parents card or phone number. Through allowing or encouraging their children to use their (the parents') email addresses as a way for them to be safer, or for parents to be in control, they were then at risk for their own data to be misused.

“My son doesn't band his details around online but everything he does online is connected to my email address - but this could pose a risk for my data” Parent 1

Young peoples' responses

We asked young people to tell us what they think of when someone talks about data, including concerns about sharing data or having data collected.

- All young participants were concerned about their data and privacy, and all had personal examples to refer to - including signing up to an email list to get a free coffee, being concerned about their digital footprint, how much you could learn about them from their social media accounts, signing online petitions and then getting letters in the post, and things like plane tickets or insurance being more expensive based on your search history.

“I get concerned about my social media footprint, who can see what and who can locate me. How you get hold of my addresses both virtually and literally.”

- Several of the young participants have taken steps to improve their privacy and protect their data, including using a VPN, giving out fake information online and deleting photos on social media. Despite taking all of these safety precautions, they are still experiencing their data being mis-used on a daily basis.

“I’ve actually done pretty well over the years keeping myself private by only giving out fake information....I always make sure websites are only using the necessary cookies and always turn off the advertising cookies.”

- A key concern for young people was the idea of being tracked. Participants spoke about their phones listening to them, Facebook tracking their location and the websites they visit tracking their activity.

“I posted something on Facebook and then a relative told me that Facebook actually tracks your location. I got very scared at that point and deleted all of my photographs at that point. Tracking your digital footprint is a concern for me.”

- Media attention around data has made many of them more cautious of their data and more cynical and aware of data collection. Two participants specifically referenced the film Snowden, about Edward Snowden as a turning point in their awareness of, and levels of concern around data.

“I became aware of the importance of my digital footprint by the time I was 15. I watched a film about Edward Snowden and became really fascinated about data rights. When I think of private data I think about Edward Snowden. For me data is the privacy aspect.”

Scenarios that have prompted seeking help or caused concern

Parents responses

We asked parents to tell us about occasions that have caused concern, or prompted them to seek help. We provided them with scenarios as prompts to aid the discussion.

All parents felt that the scenarios resonated with them, and were, in varying degrees, similar to situations that they had personally experienced, or that friends and family had.

- Several parents discussed **money being spent on their cards** as a key moment that led them to intervene or seek help. For example, spending rapidly increasing

on a card linked to a child's gaming account, or in-game upgrades taking place without permission.

"my friends sons used her credit card for adding things onto games, they were tempted into spending 100s of pounds monthly" Parent 7

"Someone hacked into his account and was spending money on his card. We complained to Roblox and it took two weeks for a refund, £90 total, we nearly needed the police to resolve it and Roblox weren't sympathetic or helpful" Parent 4, whose card was linked to his son's Roblox account.

- Another theme brought up by multiple parents was their children receiving **unwanted friend requests** - on both social media and within gaming platforms such as Roblox.

"On Roblox my nephew was set up on the adult version by accident, he had adults messaging and friend requesting - he came and told an adult who realised the mistake and fixed the problem." Parent 8

"On Roblox my son was getting friend requests and chatting to people he doesn't know." Parent 4

- **Harmful content on social media** was another area of concern - including the impact of pro-harm and pro-eating disorder content having a broad impact at school-year levels, as well as on individual children.

"At my daughter's school self-harming and eating disorders are common, and then they can also see pro-harm content online." Parent 7

- Several parents qualified their concerns with **how much they trust their child**, and respect that they have their own online lives that they can't control.

"he's savvy and I trust him lots but he's had friend requests from unknown people." Parent 1

"I have to put trust in my son to be talking to the right people....it's worrying but you have to trust him and let things go at the right time." Parent 4

Young peoples' responses

The example scenarios resonated strongly with the young participants, with several participants saying that they had experienced all three situations.

- **Friend requests from strangers** was a key theme. Five participants could give examples of this happening to them, despite having private profiles.

“I get so many random friend requests on facebook in particular and have no idea how to stop them from targeting me. I also get lots of private message requests that can be creepy from older men”

- Several respondents had come across **harmful or disturbing content** online, including on Tumblr and TikTok - and noted how the frequency of seeing these types of content increased after the first instance.

“At one point I went through the rabbit hole of Tumblr...A few times I found pretty harmful content that concerned me greatly.”

- The suitability of **adverts within gaming platforms** was also mentioned by two respondents as a concern, who spoke about being flooded with adverts based on location and cookies.

“With gaming you click on things on online games and it sends you to different websites that show you irrelevant ads.”

“I don’t game a lot but when I do I sometimes get really weird ads. Usually I just delete them but I find it weird that this stuff is allowed to be advertised.”

- Young people are **actively taking steps to avoid concerning scenarios**, such as having private profiles and turning off location settings, suggesting platforms aren’t doing enough to respect the settings that young people are utilising for additional security.

“I don’t understand how people are still finding me when I’m taking all the precautions to make it private as I don’t think they’re just typing in my name in the search bar”

- Most respondents said they were more likely to try and address an issue themselves, for example by deleting an account, unsubscribing from spam emails or looking up how to change settings or fix a problem on the internet.

“I usually go to the internet first to look for help before I go to the platform.”

- Two young people had complained to social media companies, but their issues had not been resolved.

“I’ve also looked up how to contact social media customer services and anyone who has done that knows that they don’t get back to you.”

“Platforms will only take quick action if it is impacting their business”

Experience and expectations around seeking help

Parents responses

We asked parents if they'd ever made a complaint to the ICO, and if they did what they'd expect.

- A few parents had complained to platforms but none had taken it further or considered the ICO to complain to.

"I don't know where to go to make a complaint, I'm not aware of a commission where you can go to make the complaint. I know there's a gambling commission but not for general online activities." Parent 5

"you're not going to complain that your rights aren't being upheld if you don't know they exist" Parent 8

- Parents all stressed ways in which they thought the ICO and Children's code could be more visible and accessible, including **publicity campaigns** (suggested by four parents), mandatory **advertisements to watch on gaming platforms** before children can play, and **ensuring that people know what their rights are**, and therefore what they can and should complain about.

"when they're clicking into games / sites have a 20 second advert before it so they know what to do if something harmful happens when they're in that place... then it's going to be more memorable and stick in your mind." Parent 6

- Parents also discussed how they would want to interact with the ICO with regards to a complaint. They placed emphasis on the ease of making a complaint, and the speed of communication they'd expect.

"having an app on your phone to contact them there and then instead of having to search and google it or going through the game and going through your settings - the speed and accessibility of getting there is what's crucial." Parent 1

"Make it as quick as possible - we're all busy parents" Parent 8

We also asked parents how they would feel about their child making a complaint without them.

- Parents all responded that in an ideal world **they'd like to be part of the complaints process**, despite the trust they have in their children.

"I would want to be part of the process - I trust him but I have more world experience - I want to be involved from top to bottom....I don't want my child feeling confused, mugged off or befuddled" Parent 4

- Some parents responded that in the absence of their child feeling like they could seek parental support, they would be **happy to know the child had somewhere else to go** to complain and seek help.

"if my kids can't come to me there's somebody there that she can report to - when my son is a teenager there could be things that he might want to report but not want to tell his mum about and I'd want him to have somewhere to go." Parent 8

Young peoples' responses

We asked young people what they would expect ICO to do if they did complain.

- Several participants said that they would want to know **what the process entailed, how long it would take, and what possible outcomes could be achieved** from the outset, to manage their expectations when submitting a complaint.

"It makes you feel as though there is a long process to be involved rather than immediate action. You feel as if you're going through loopholes to get there."

- Participants were positive about the potential of submitting a complaint to ICO, but were unanimous in not knowing where they'd find this option, or how to start. They suggested **making reports / complaints buttons much easier to find**, and providing clear routes to submit a complaint to the ICO. They wanted to see a much more active approach to submitting a complaint.

"Maybe something that is a bit easier to access instead of having to go deep into settings."

"Make the report button on Facebook and Instagram a lot clearer... it should be an accessible button instead of having to go through the whole platform to find out how"

"Less of a passive, "you can report if you want to" and be more active, these are instances when you can report."

- The challenge of people **not knowing what their rights are**, and therefore whether it's appropriate to complain was mentioned multiple times.

“There isn't really education about data so having a complaints procedure isn't very useful if platforms aren't giving you an indication on what's dodgy. It doesn't need to be an exhaustive list but just to give you an idea.”

- As with the parents group, the participants all stressed the importance of the process being **quick, and simple to use**. When asked what they would suggest, they said:

“The speed of how they do it.”

“To make it as simple as possible.”

6. Recommendations

Based on the findings of the focus groups, and Parent Zone's broader understanding of the context of digital family lives, we would suggest the following recommendations to the ICO.

Raising Awareness

Current awareness of the ICO and Children's code is extremely low. Raising awareness of the Children's code would help parents and young people understand their rights, and know that there is an option to complain if they would like to.

Simple path to complaining

Most respondents had never complained to any platform, and none to the ICO, in part due to the difficulty in navigation to a complaints procedure. A simple and easy to find option on the ICO's website would help people who had decided to complain actually submit this.

A process for responding to complaints

Ensure that there is a quick acknowledgement of the complaint, and a clear description of what will happen next, including estimated timeframes.

Ongoing support

Consideration of how ICO may support, directly or indirectly, children and families through the complaints procedure, and to recover from the incident that resulted in the complaint.

VoiceBox report on Peer-to-Peer Research

Introduction

The following section presents a report on the peer-to-peer research commissioned by Parent Zone from VoiceBox as part of the overall response for the ICO. The report was produced independently by VoiceBox, and the peer-to-peer research was carried out by VoiceBox youth ambassadors. The two documents have been combined for ease of access for ICO.

VoiceBox

Peer-to-peer Research

November 2021

Introduction

Three VoiceBox ambassadors were selected to support the ICO's work around the Children's code and a young person's right to register a complaint with them if they believe an organisation is not meeting the required standards.

The VoiceBox ambassadors were aged between 17-24 and carried out peer-to-peer research to help gather young people's opinions and suggestions around this topic. Those they interviewed were between the ages of 14-25 years old.

- 14-15 x three people interviewed
- 16-17 x four people interviewed
- 18-25 x nine people interviewed

Many of those interviewed were between the ages of 18-25, as the peer-to-peer method means that the ambassadors would most likely engage with others their own age. This approach is hugely beneficial as it encourages them to reflect back on when they were younger and as a result they are often more articulate at expressing what they felt and what they would have wanted in certain situations.

They delved into their peers' understanding of their data rights, shared experiences of examples that have concerned them and made suggestions on how the ICO can create a system that is relevant and easy to use if they want to complain.

Summary of key findings

Awareness of the ICO and the Children's code

Only one person had heard of the ICO and the Children's code.

Understanding of data

13/16 of the young people fully understood the vast level of personal information that is considered 'data'. Whilst, two of the younger ones were less engaged with what data meant and thought it was 'boring information'.

They spoke about a real lack of privacy and many were distrustful of the power that platforms have when it comes to storing and selling data. Instead, five of them took it upon themselves to protect themselves online by using VPNs, going incognito and sharing false information.

However, providing fake information, in turn, will negatively affect the age verification process designed to protect those under 18.

Data related concerns

All participants had countless experiences where their data has been misused, including unwanted friend requests and emails, receiving adverts based on location and getting hacked. Over half of them were incredibly aware of the information they gave out and where possible tried to limit sharing their data. Four of them also worried about their digital footprint and were concerned about how this might negatively impact them in the future.

Despite their concerns, over two thirds didn't know how to protect themselves from having their data collected and also felt this was an inevitable experience of being online.

Concerns about specific apps and platforms

Half of the participants said that they're so used to sharing their information that they often don't think about how their data might be abused later on. Four were reluctant to use apps where they were unsure what would happen to their data. If they were concerned about something they would research their issue through a search engine like Google, instead of challenging the platform itself.

Complaints process

Those who had made a complaint found the experience disheartening and said that it has prevented them from making any more. Half of them said they mainly choose to ignore these experiences and for them to make a complaint it would have to be something they considered as severe.

One third of participants felt that the complaints process felt very robotic and that they weren't being properly listened to. Six felt sceptical towards organisations taking their complaints seriously and even receiving a response.

Expectations around seeking help

They wanted to know their data rights in an easy digestible format and that any complaints process should be straightforward. They wanted a more active approach to challenging wrongdoings and for the complaints process to be much more obvious.

They wanted evidence of their complaint and a quick response to show that it has been acknowledged and taken seriously. They valued options for how they wanted to be communicated with and were keen to see real consequences to those who abused their data.

Findings

Were they aware of the ICO and the Children's code?

Only one participant had heard of the ICO and the Children's code but had little knowledge about what they did and what this meant for them.

"Heard of them in an ICT lesson on how internet safety works but not completely sure on the specifics of what they do." (aged 17)

What do we mean by data?

The young people were asked what they thought of when someone talks about data.

They discussed how the data being collected is a lot of personal information which includes much more than just name, age and location. They understood that this included information such as images, their interests, search history and past online conversations.

"My personal information such as photos bank statements or emails and messages" (aged 17)

"My understanding of personal data is information that is about you." (aged 21)

"Useful Information in any electronic format. It could be personal information or any sort of sensitive information" (aged 24)

"I think of personal data as anything and everything that relates to me, my conversations with someone as well as any sort of media - including photos and videos." (aged 19)

"Data brings to mind any sort of personal items stored on my phone, laptop or tablet device. I think of my photos, emails, chats, SMS and contacts as data." (aged 18)

"People think of data as just name and location, but it goes so much deeper. They know absolutely everything about you and they can backtrack everything about your bloodline." (aged 25)

However, some said that the concept of data was hard to understand and that they found the information confusing and boring.

"Numbers, spreadsheets, tables which are hard to understand." (aged 14)

"Boring information- information that's hard to understand and would find hard to pay attention to. I think that the fact that it's hard to understand makes it a concerning topic." (aged 16)

Many spoke about how easy it was to find information about themselves and others online and how they felt uneasy about this reality.

“I do not understand why they would care much about my email or phone number unless it is a smaller sketchy site.” (aged 14)

“I was shocked that I was able to do a background search so easily on other people I knew in real life.” (aged 21)

The vast majority spoke about a real lack of privacy for everyone and that it was basically impossible to protect your data.

“I have no idea how to prevent it from happening.” (aged 19)

“We need to come to realisation that there is no real privacy.” (aged 21)

“From the day you are born, you have no identity on the internet, you are just a number. On the internet, you are just data. Third parties no one cares to know who they are, and you do not even know the cookies that you accept. The internet (including Siri and Alexa) want to know the type of information you provide so the data can be used.” (aged 25)

“We are just numbers on the system. We choose to ignore it. We do it because it makes our life easy, like when we look for someone or when we want shops that are accommodating to our needs.” (aged 25)

“I have kind of reached this apathy stage about it where people know where I am and what I am doing.” (aged 21)

Some discussed the power of tech companies to store and sell your data and the lack of control they have against them doing this. They didn't believe that these tech companies were either obliged to protect their data or if they did they didn't believe they were held accountable.

“The fact that facebook, instagram, snapchat and whatsapp are affiliated, and you expect them not to share your data? There is no control over privacy.” (aged 21)

“It almost seems as if my social media presence is being tracked and sent to product companies who then send me targeted offers.” (aged 19)

“I wanted to download Tiktok which is really bad for data protection, but I kind of reached this point where I do not really care for me personally because I do not know how else to protect myself from it.” (aged 21)

“Online there is stuff like ‘cookies’ and personalised ads and without TDR you have to go through so many pop ups and your data can be easily sold without your knowledge. Websites will make money because they will provide your stuff for free, and profit off the data you give them.” (aged 20)

Many young people felt that the responsibility of securing their data fell on them and it was up to them to be savvy to protect themselves. They spoke about being careful of what data they gave out and using VPNs to keep their data safe.

“I aim to not divulge personal information as much as possible. Even on public WiFis, I tend not to connect to them because they ask for a lot of personal data which I feel uncomfortable sharing. I have been careful to not get into that.” (aged 19)

“You have to be smart the way you use social media.” (aged 25)

“People are shocked when their information is leaked without knowing what a public network is. That is why VPNs are amazing.” (aged 21)

“I feel we are being tracked all the time -I have started using incognito more often to prevent this.” (aged 19)

Concerns about data sharing/collection

The young people were asked if they had any concerns about sharing data or having data collected about them online.

Many young people said they were cautious about sharing their data and where possible tried to limit what information they gave out.

“I try to avoid the possibility of sharing my private data but some websites keep that clause where it is mandatory. I am very wary of giving away my date of birth and mobile number in specific.” (aged 23)

“For those websites I am unsure about, I tend to write “not to collect my data” when there is an option.” (aged 24)

Some said that the prominence of data scandals in the news have made them more aware of the issue.

“I think of the recent facebook scandals and how they’ve been accused of abusing data and how big of an industry the selling of data is.” (aged 15)

“Data leaks news in the media made me think more about it. The Cambridge Analytica scandal was one of the most prominent ones that triggered my interest” (aged 24)

They discussed things that had happened to them when they were younger and how those experiences had made them more aware of their data being collected and others can take advantage of you.

“When I was a kid I was obsessed with the Kim Kardashian game and they had this thing if you wanted to get stars you just needed to sign up and so I gave them my email and all of a sudden I was getting all these targeting and advertisements. And because of that I received something in the mail saying I owed them over £100.00 and if I did not give it to them, they would come to find me. I was so worried and they take advantage that children do not understand the dangers of sharing that kind of information.” (aged 21)

They expressed concerns about how things they did in the past which are stored online, can have negative implications for them in the future.

“I do not believe we should be held hostage to what we did in the past when it comes to stuff like sending nudes from one consenting adult to another, or when children without the concept of data share information with one another.” (aged 21)

“Children can be so exposed to the world so easily, which I always feared. Children, the majority of the time, do not understand the impact of their actions.” (aged 21)

“I was exposed to so many forums such as tumblr, fanfiction and deviantart where things were not filtered and were easy to be exposed to. Because I was too young to realise I was showing certain demeanours of myself, I was open to the entire internet for criticism and danger.” (aged 22)

“I do not know what people know of me because of what I looked up as a kid. If I were as careless now, people would probably know everything” (aged 21)

They discussed everyday examples about their data being shared with third parties and how that is a concern for them. The majority of them spoke about receiving unwanted friend requests and emails/posts that they did not sign up for.

“Getting mass amounts of junk mail and have had friends who have had accounts hacked” (aged 16)

“I have received many random calls without having signed up for it. And leaflets in the mail with my name even though I never signed up for them. I always worry about that kind of stuff. I also always get random marketing emails even though I never subscribed. I will search up something and the receive marketing emails related to that search. Or sometimes I will get friend requests on Facebook from people I do not know.” (aged 25)

“I get the most random emails telling me I have won something, or those fake messages telling me I have received a parcel. I get those all the time and I have no idea what I must have signed up for to activate that.” (aged 20)

Some spoke about their security, whether this was to do with location or being contacted by someone they did not know.

“I always worry about my number being shared with a third party or someone knowing my address.” (aged 21)

“It happens a lot, and one time I was on Instagram and I checked where my phone was and it told me it was in Farnborough, and I was like “what?” So, stuff like that creeps me out a little. And I get random bot accounts that try to follow me and view my stories, so I private my account.” (aged 14)

Others spoke about being worried about the types of adverts and content that they were being served.

“How social media sites collect data about you because they often show ads that are weirdly related to things you were talking about and it can be scary how much they must know. It feels weird how accurate it can be” (aged 14)

“I’ve seen a lot of TikToks that promote self harm and suicidal thoughts before without even searching on the for you page.” (aged 15)

“I believe sometimes that devices are not only tracking my searches but also voice. I recently experienced this when during a call with my cousin, we were discussing a particular brand. The very next day I had ads from that same brand and it was only the first ever instance when we spoke about it. I feel that is very scary.” (aged 23)

“Get sent inappropriate adverts when I’m playing games” (aged 14)

Others mentioned occasions when they didn’t understand why someone was even wanting that information, they couldn’t see the relevance for that question and that concerned them.

“There was a form thing I was filling out and everything was optional but then one of the questions had a red star next to it which was vital information and I was so confused why they needed that. Another time was when I was younger and another site wanted to know my blood type.” (aged 20)

Some spoke about issues that have happened to them but felt that despite being concerned about these scenarios they felt relieved that the situation was not worse.

“When I was 16, I was hacked on Facebook because I clicked one of those links that are like. ‘Is this you?’; so, when stuff like that happens, I do get worried. But thankfully I did not have stuff like location or my card on my account, so unless it is something dire like that, I tend not to worry.” (aged 21)

In contrast, others said they weren’t overly concerned about this as they were a generation who have grown up online and this is something they have learned to accept. They felt that they were powerless to change the situation and as a result have learnt to live with their data being

collected and shared with others. They also spoke about how much the internet has evolved during their childhood.

“It is something I am so used to because I have always grown up with the internet, but obviously I think it is a bit weird about how much they collect and require, but overall I do not really think about it.” (aged 14)

“It is just normally my email and because I am so used to it, it doesn’t really bother me.” (aged 14)

“No matter how much laws intend to protect data there’s still such a large market for selling data after collecting it.” (aged 15)

“I am a z-millennial because I grew up with the birth of the internet and I am still on it so there is not much I can do. I started my first email when I was 12, and my parents had no worries because the internet they knew is not the same as the one I knew growing up.” (aged 25)

“I feel realistically I should be more scared than I am.” (aged 20)

“Honestly I am not that well educated on the internet and I do not actively go out of my way to be so. Unless my anti-virus lets me know I shouldn’t visit a site, I don’t usually look out for that stuff.” (aged 20)

It is so easy to click accept with terms and conditions, and they will just have the accept button without you having to scroll down. And even if I was to read it, I do not know what I’m looking for and could easily ignore every red flag. It is so easy not to think about it, because the internet always feels like a fake world. It is so easy to blindly trust.” (aged 20)

Despite their concerns, many didn’t know how to protect themselves from having their data collected.

“The settings can be hard to navigate to try to be as private as possible” (aged 15)

“I do not know how to protect myself from it at this point. I know I could use stuff like a VPN or even not have social media but I want to continue networking. Especially during covid, I felt so disconnected from everyone, so I became more influenced by it.” (aged 21)

“The fact that all websites have cookies is worrying and they’re quite hard to turn off, it’s really easy to just click accept and so your activity can be tracked.” (aged 16)

Concerns about specific apps or platforms

The young people were asked if there have been times when they have had any concerns about what games, apps or platforms are asking of them.

Many young people said that often when they share their information, it’s in the moment and they don’t really think about how their data might be abused later on. They’re so used to having to give out their information that even if they are aware of the negative repercussions they’re still willing to share this information.

“It’s quite annoying to have to toggle off all the different cookies of websites so it is often easier to just accept all.” (aged 16)

“The problem is that I never had concerns about signing up for stuff and what they asked of me until I received something concerning from them. And even now I know the concerns of sharing things, but I choose to ignore them because we do not consider what is behind the digital world. It is easy for us to hide behind the screen, even if we are being as cautious as possible.” (aged 25)

“I remember receiving a lot of spam emails after signing up for a platform. It was concerning because they were very frequent and unnecessary. I mostly tend to unsubscribe from unsolicited mails from now on.” (aged 19)

Others said the unease and uncertainty about what would happen to their data prevented them from using certain apps and platforms.

“I’ve seen friends playing games with adverts but I don’t like the idea of it so avoid downloading those types of games by reading reviews.” (aged 16)

“There have been times when I refused to share my details and was unable to use that platform.” (aged 23)

“Some games and apps did ask me about my contact list and I was worried because I did not feel any need to share them and in no way it was related to what the game/app did. I do not know what they would do with that data as well so it was concerning. I chose not to share it with them which at times meant I could not use the app.” (aged 24)

“It is better not to disclose personal information as much as possible, especially on unknown platforms.” (aged 19)

Many spoke about the ease of pretending to be over 18 when you’re not and how this in turn will have a negative impact on your data rights.

“I always just assumed that there was a kid’s code. But I think definitely growing up there was not enough restriction. When you’re a kid and a website asks if you’re 18, it was so easy for us to lie because we did not think anyone could know or find us.” (aged 21)

Interestingly, many spoke about turning elsewhere for support, rather than the platform itself.

“I’d search for a help site by googling the concern.” (aged 15)

“I have had concerns for them and searched online as well. It seems it has happened with many others as well. I usually describe it on Google like a long phrase and I get the results.” (aged 19)

Complaining about Data collection and storage

The young people were asked if they have ever made a complaint to a platform, game or app.

Some said that they haven't made a complaint to an app before and the approach was to ignore any issue and move on. Some even said they wanted to avoid 'confrontation'.

"As a child, I would never have complained about anything and my parents' approach was just to ignore it and not use it anyway." (aged 21)

"Usually if I do not like it, I simply delete it." (aged 21)

"I feel like I am not confrontational enough on the internet to put through a complaint." (aged 20)

"I have marked as spam several emails and unsubscribed to them as well if I used to get unsolicited email in my inbox." (aged 19)

They felt like for them to have to make a complaint it would have to be something they considered significant.

"No I have not made any yet - however I think I would make one only if something very drastic happened." (aged 19)

For some who had complained, they found the process fairly straightforward but were not impressed by how automated the system was.

"I made complaints about comments on posts on social media apps that were harassing comments. Found it quite easy but can be annoying because it goes through the automated system first so it might not be able to tell" (aged 16)

"I've reported some messages using the automated report system but have never formally complained and are unsure of how those processes work." (aged 15)

Whilst others who had complained felt disheartened about the experience and haven't since.

"Yes, I have. It was about four years ago and my Instagram got hacked and they posted my password on my story and I totally freaked out. So, I kept emailing Instagram and they never really replied. But ever since then, I have been super careful with my passwords out of fear that will happen again." (aged 14)

"I got a new account because I got logged out of my old account and so I couldn't get back into it and so, I emailed them asking if they could take it down but again, they never responded." (aged 14)

They agreed that they would be more inclined to complain to an app if they received a quick response regarding their complaint. They valued customer service and believed that was

important to make sure you felt that your complaint was being acknowledged and valued.

“I would feel sceptical about if they ever did reply and I guess it would depend on the size of the company. Apps like Instagram have millions of complaints a day, so, I would never expect to be responded to but if it was a small seller on Etsy, I would more likely expect a response.” (aged 20)

“I would be more comfortable making a complaint if they are quick to respond. I guess it depends on the app and their customer service.”(aged 25)

“I did one yesterday to Paypal as they won’t reply to my account being suspended.” (aged 21)

They felt that it is a robotic system and that there was no one actually listening to and acknowledging your complaints.

“When I was younger, I would have done it with a parent but as a child I never put together that there was someone behind a computer operating the whole thing.” (aged 21)

Complaining to the ICO

As none of the young people were familiar with the ICO, none of them had experience complaining to the ICO about their data. However, when asked what they would expect from the ICO, they had lots of suggestions.

They felt there should be an option for emergency situations.

“I would want an emergency helpline to be created - it can help in addressing issues that require immediate attention.” (aged 19)

They said complaining should be made easier and more obvious to do so. They should have all the information accessible to them so that they know their rights and what to do about those who break the rules when it comes to their data rights.

“I would ask about that ‘Cookies’ thing and how they are always asking for that. Like, I don’t really know what that’s about. Everything to do with explaining more about cookies and whatnot, because with terms and conditions, it is always so long and they know that no one bothers reading it.” (aged 14)

“There should be a category to respond and important info such as data related to children” (aged 21)

“I’d expect them to maybe signpost to how to make formal complaints to platforms or see problems with platforms from common complaints.” (aged 15)

They would want the process of complaining to be made as easy as possible.

“I would want them to know about my situation is as short as possible (eg MCQs/short answer questions)” (aged 19)

Young people said they would expect to have evidence of their complaint, whether that is by email or within some sort of portal.

“Ironically, I would prefer email for contact so there is a tract. Or anything that is trackable so there is history.” (aged 25)

“I would prefer an automated response to let me know it has been received.” (aged 21)

They also expressed the urgency for them to receive this acknowledgement.

“I would like a time limit to respond to complaints” (aged 21)

“To respond quickly and give constant updates on the progress so we are not kept in the dark. To bring about a decision in as less time as possible” (aged 23)

“I would want a fast turnaround - it is essential to have quick responses for such things.”(aged 24)

“I would want an immediate recognition and an immediate reaction.” (aged 21)

“I would like for them to be responsive within a working week or a couple of days.” (aged 20)

They wanted every complaint to be taken seriously.

“I would like all complaints to be taken seriously.” (aged 20)

They wanted options for you to select about how you wish to communicate your concerns.

“I’d want them to contact me by social media or like the chats you can have on websites” (aged 14)

“Preferably online for those who do not like phone calls. I would rather it be done via chat.” (aged 20)

“Revert back quickly (on phone if possible), frequent updates on sms/email” (aged 19)

“I think an online chat box could help in case people do not feel like speaking on call.” (aged 19)
“I’d prefer them to contact me by email.” (aged 16)

Others spoke about punishing those who abuse their power and break the law. They wanted to see real consequences for those who did this and as a result hope that this would work as a deterrent.

“I’d expect them to talk to the company about the problem to put more pressure on them for a solution” (aged 14)

“It really depends on the occasion but I would prefer for ICO to sanction and penalise the perpetrators to be found by the FBI, CIA, etc. It should work with organisations that have actual dursdiction and legal consequences. Work with higher powers within the world.” (aged 21)

They acknowledged that services like this can constantly be improved, so they suggested that customer feedback should be encouraged.

“I would love for them to expand on their international range for kids everywhere.” (aged 21)

“A follow up message on customer feedback so they can improve.” (aged 25)

“A call helpline would also be good to have.” (aged 24)

Postcodes of those interviewed

As requested, below is a list of the first half of each participant's postcode.

HP16	W2	DN7
N19	HA	PA15
GU51	SW	LE17
W2	SA2	SW11
SW	SO23	HP3
TW20		