

Digital Consent Mail In Query

From: Internet Safety <internetsafety@justice.ie>
To: Digitalconsent@justice.ie,
cc:
Date: 02/12/2016
Subject: Data protection safeguards for children ('digital age of consent')

Dear colleagues,

I refer to the consultation on the 'Data protection safeguards for children ('digital age of consent') and ask you to note the submission below on behalf of the Internet Safety Advisory Committee.

The Internet Safety Advisory Committee acts as a forum for relevant stakeholders to share experience in the area of internet safety. It advises the Office for Internet Safety/Department of Justice and Equality on such matters. Further information on the Internet Safety Advisory Committee may be found on the Office for Internet Safety at the following link:
<http://www.internetsafety.ie/website/ois/oisweb.nsf/page/aboutus-isac-en>

"The Internet Safety Advisory Committee welcomes this consultation and the increased focus on online safety for children. Having discussed this matter our view is, for want of an answer to an imperfect question, we should set the age for digital consent at 13 once this is coupled with a comprehensive awareness and education provisions. We recognise the inherent challenges with relying on children declaring their own ages accurately as a basis for controlling access to services and suggest a wider public discourse on this issue and the wider subject.

We enclose the submission from our member the ISPCC which highlights the suggestion from Professor Sonia Livingstone who asks, could it not be possible to set the age limit at 13, and then require organisations that hold data to ensure this data is not used for commercial exploitation, only for service enhancement?[1] That means that children aged 13-17 could still access services, but couldn't be targeted for commercial reasons. This would allow children access to services (vindicating their right to participate), but still ensure they are protected (recognising their right to protection).

[1] <https://www.betterinternetforkids.eu/web/portal/news/detail?articleId=687352>"

Regards,

Edward Shortt
Office for Internet Safety

