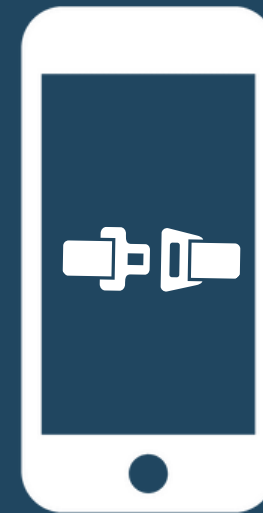


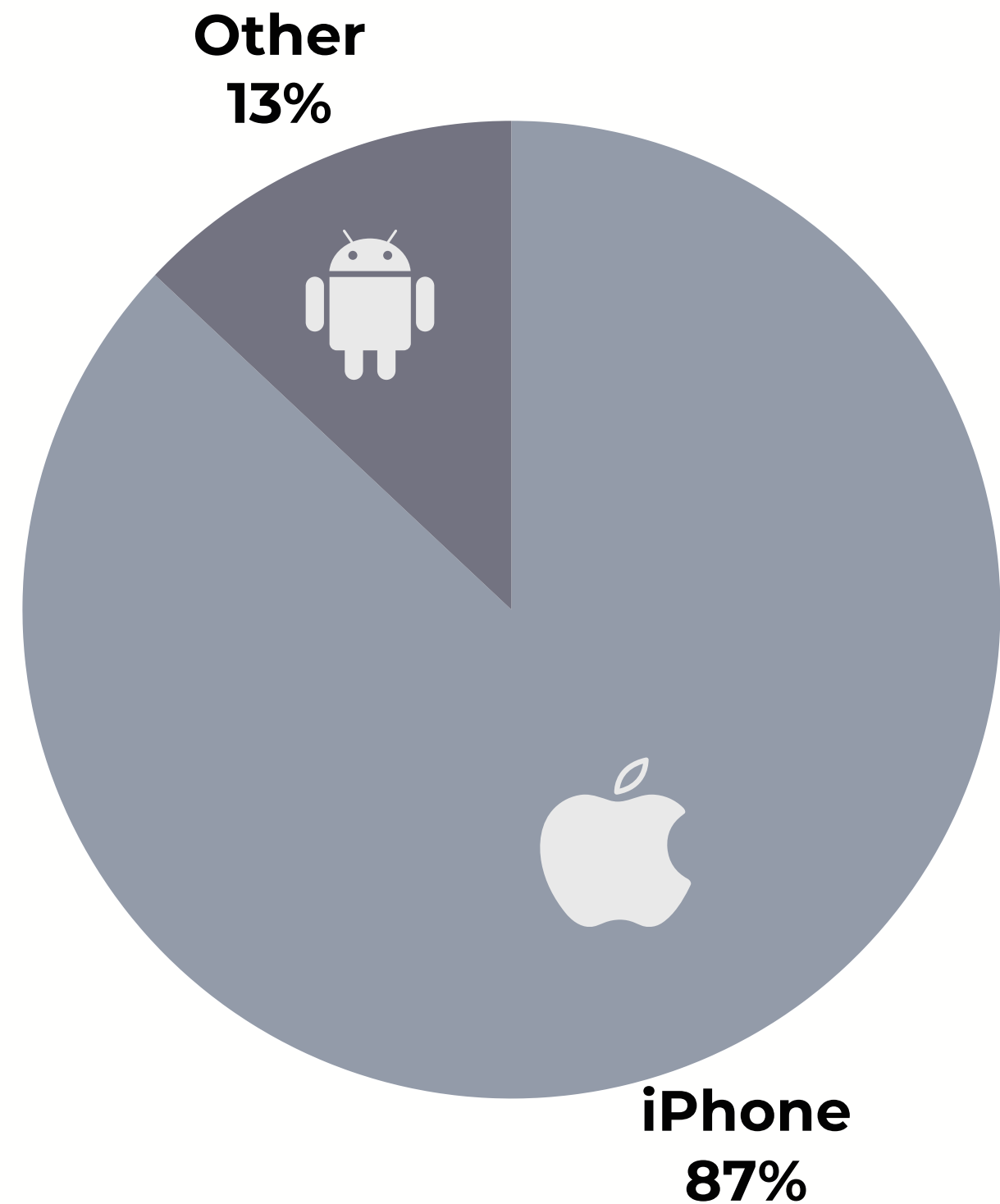


# SEATBELTS FOR SMARTPHONES



Age-Appropriate  
— SMARTPHONE ACT —

10 changes to make smartphones safer for children



**87%** of teenagers own an iPhone

-Piper Sandler 2023 survey

There are regulations to safeguard children from harmful toys, food, playgrounds, medications, furniture, and clothing.

**There is a concerning lack of regulations for devices on which children spend hours every day.**





“

APPLE MADE THE DECISION TO MAKE THIS THE SAFEST, THE MOST SECURE, THE MOST PRIVATE COMPUTING DEVICE THAT THE WORLD HAS EVER KNOWN. WHAT IS KEPT OUT BY WALLED GARDENS IS FRAUDSTERS, PORNSTERS, AND HACKERS.

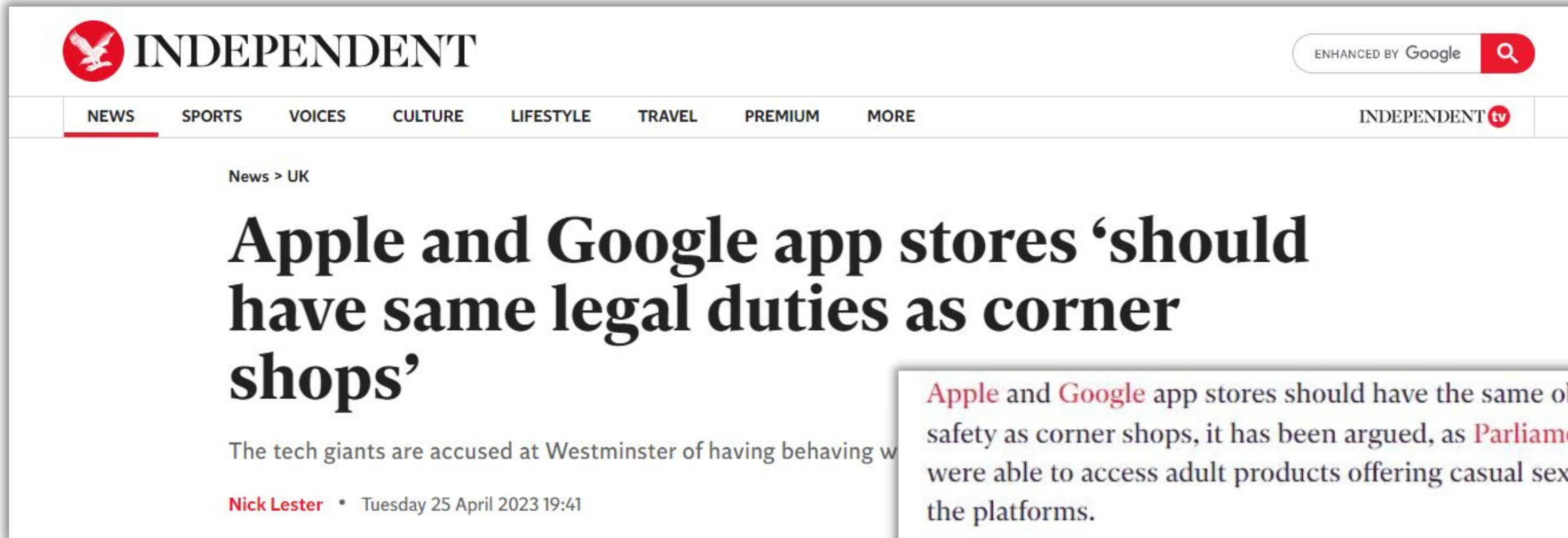
**- APPLE ATTORNEY, MARK PERRY**

”

Source: Fortnite appeals trial November 2022

<https://fortune.com/2022/11/15/fortnite-epic-games-apple-iphone-app-store-competition-court-battle>

# "Same legal duties to child safety as corner shops"



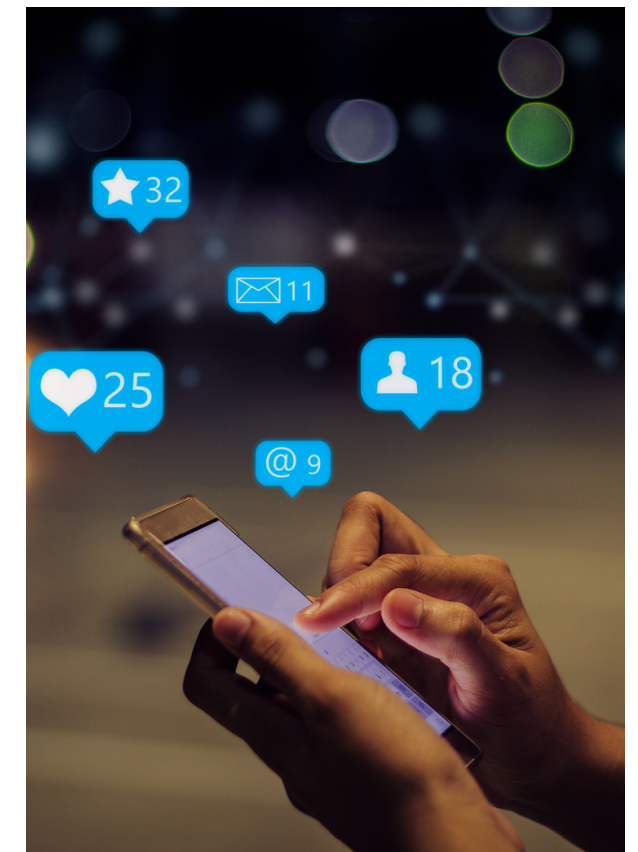
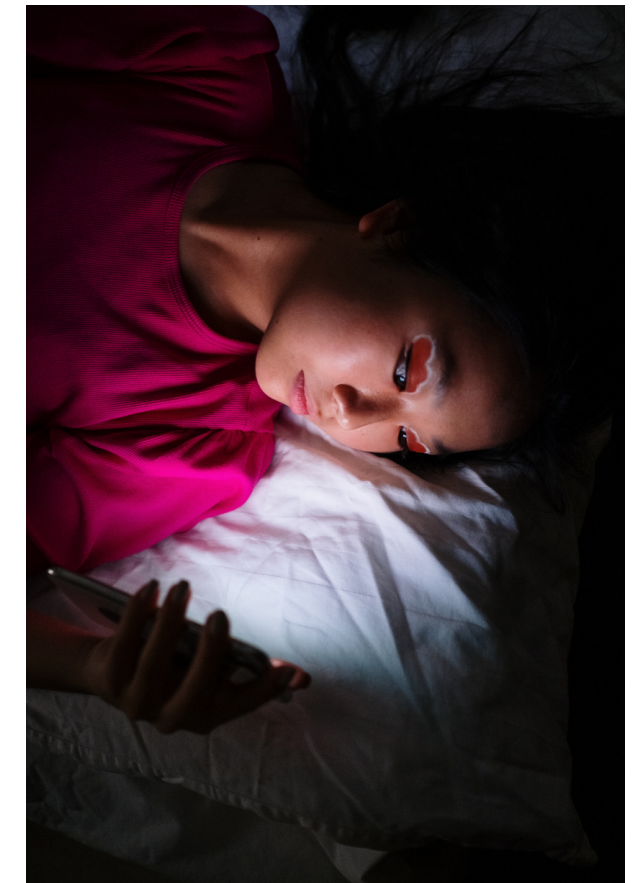
The screenshot shows the top of a news article on the Independent website. The page includes the Independent logo, a search bar with 'ENHANCED BY Google', and a navigation menu with categories like NEWS, SPORTS, VOICES, CULTURE, LIFESTYLE, TRAVEL, PREMIUM, and MORE. The article title is 'Apple and Google app stores 'should have same legal duties as corner shops''. Below the title, it says 'News > UK' and 'The tech giants are accused at Westminster of having behaved w...'. The author is 'Nick Lester' and the date is 'Tuesday 25 April 2023 19:41'.

Apple and Google app stores should have the same obligations to child safety as corner shops, it has been argued, as Parliament heard youngsters were able to access adult products offering casual sex and gambling on the platforms.

This was permitted even when the tech giants “emphatically know” the user is a child, according to a Tory former minister.

Lord Bethell accused the firms of behaving with “an air of exceptionalism”.

Many complex online child safety problems with which we struggle as a nation **could be solved** with a few updates to Apple and Google's parental controls.

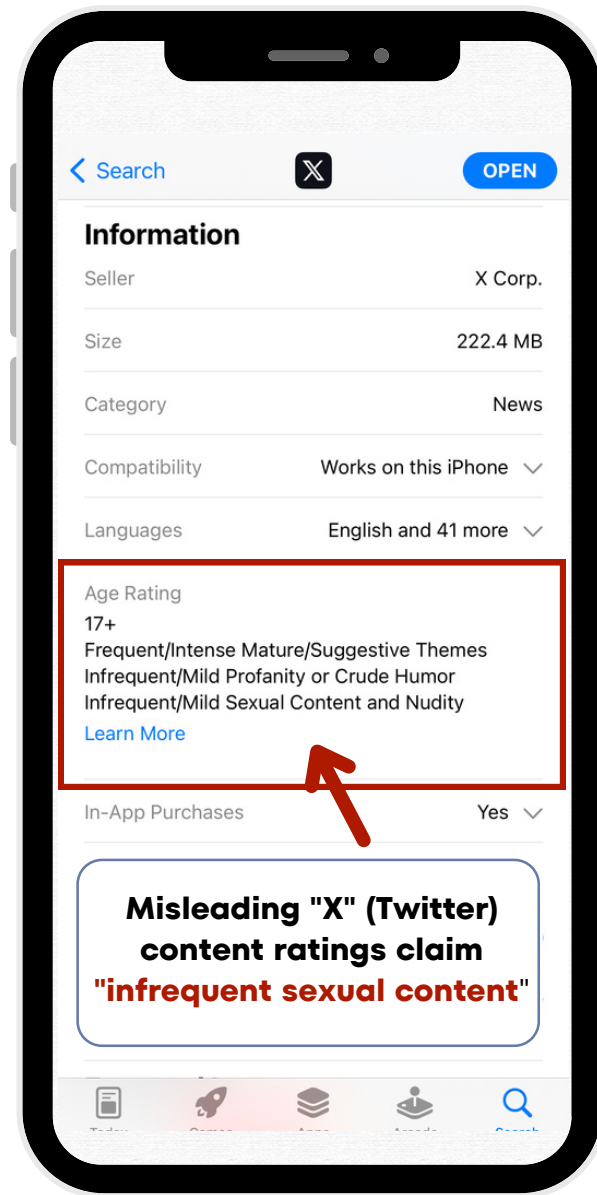


# 1

## Require app stores to adopt new **accurate app age rating systems for informed consent**

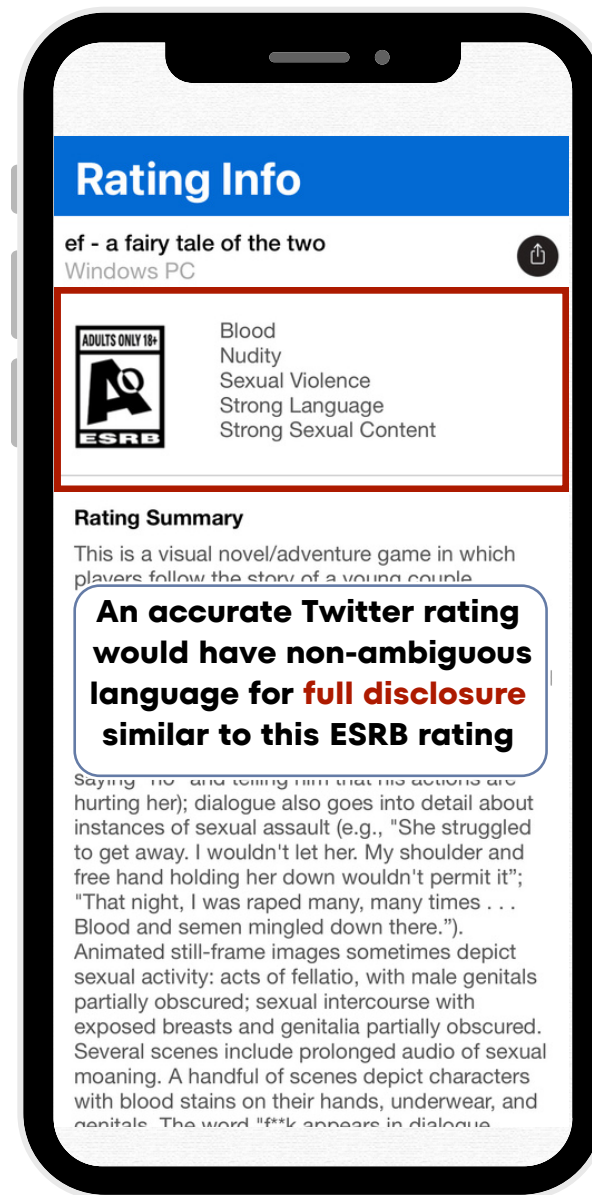
### APPLE RATING

(VAGUE, HIDDEN, DECEPTIVE)



### ESRB RATING

(ACCURATE, HIGHLY VISIBLE, ACCOUNTABLE)

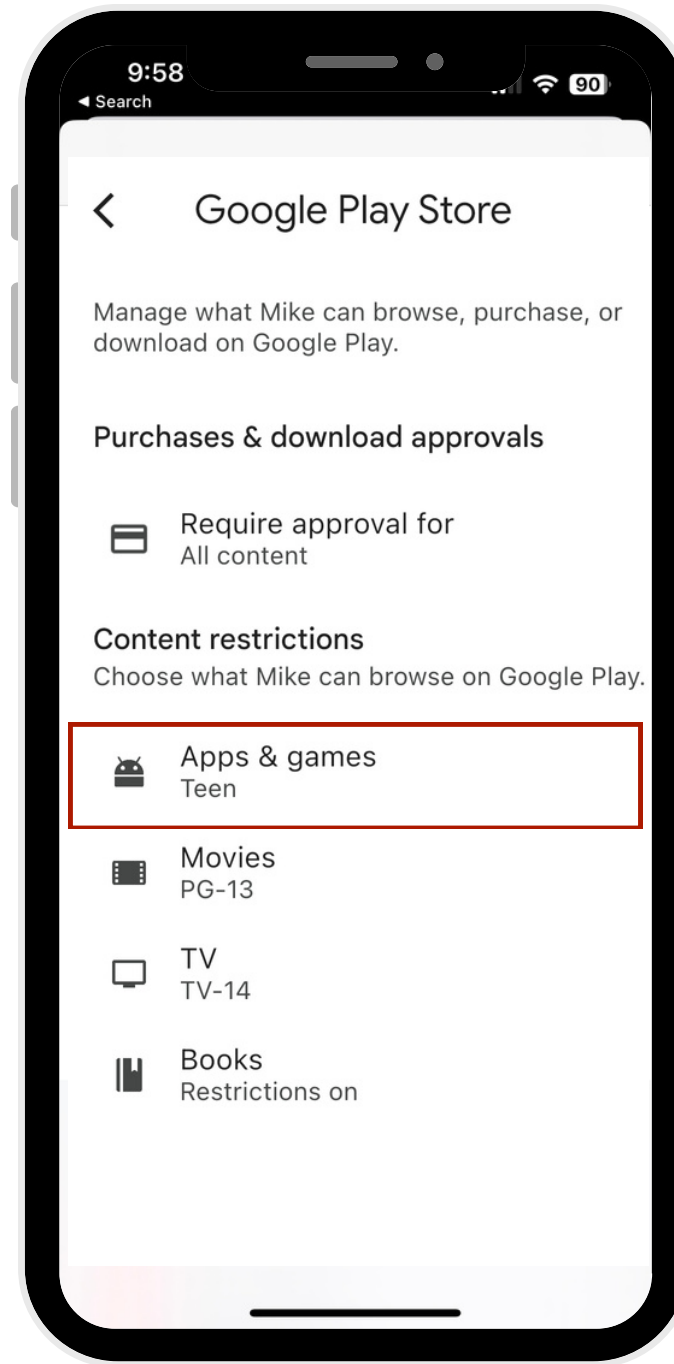
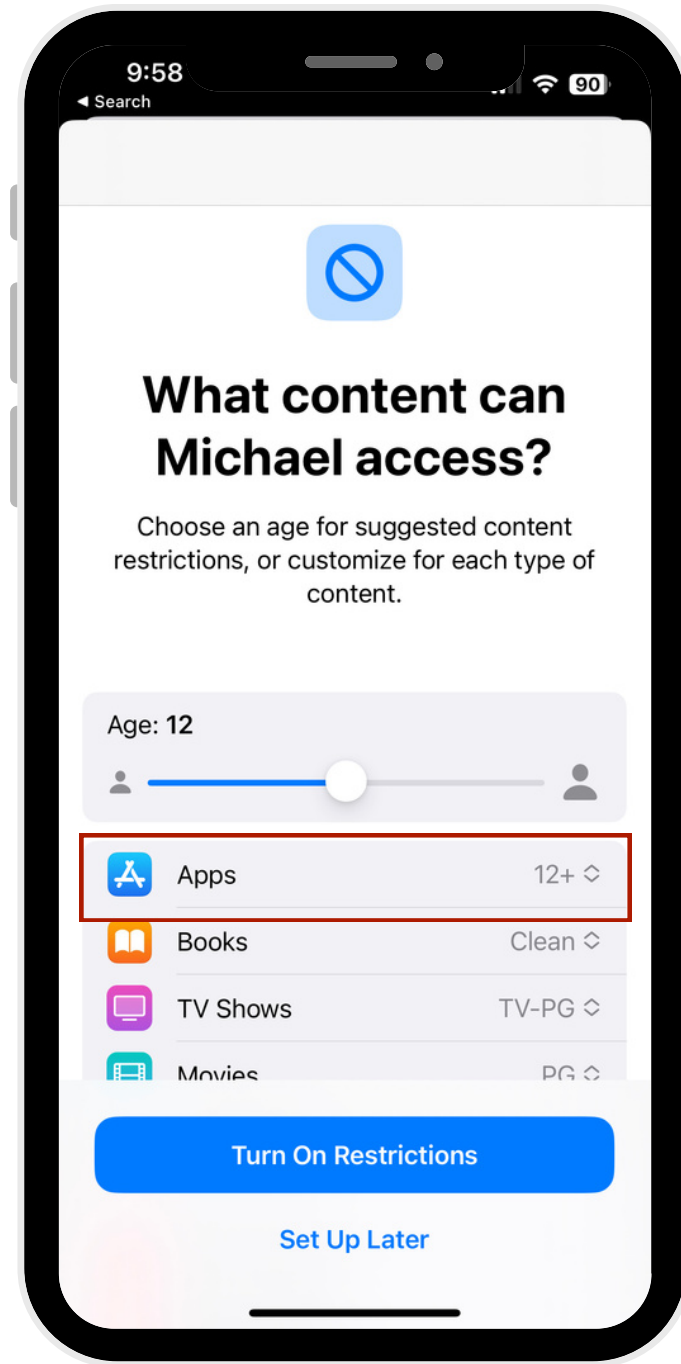


- **Accurate Age Ratings** - App Store ratings can be deceptive.
- **Accurate Content Descriptors** - Content descriptors are vague, hidden, and can be inaccurate.
- **Highly Visible Ratings** - App Store ratings and descriptors are not prominent enough to fully inform parents of risks.
- **Uniform and Accountable System** - There is no uniformity between app stores or accountability to consumers who are harmed through deceptive ratings and descriptions.

<https://www.esrb.org/ratings/33508/ef-a-fairy-tale-of-the-two>

# 1

## Require app stores to adopt new **accurate app age rating systems for informed consent** (continued)



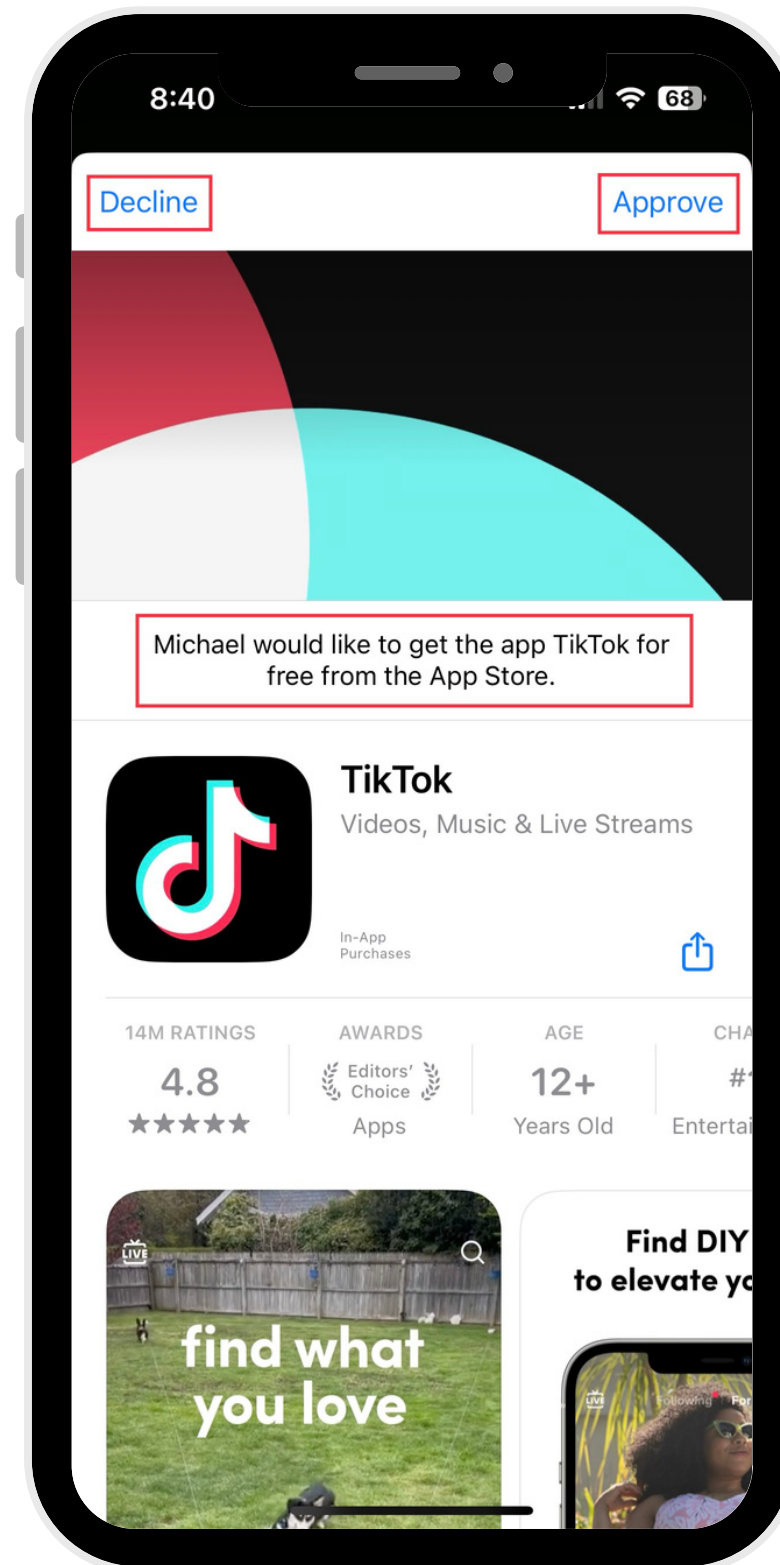
- **Parental controls rely heavily on app age ratings** for default safety settings. Consequently, deceptive app ratings mislead parents into believing their children are shielded from harmful or explicit content, when in fact, they are not.
- **Apple's 12+ rating for most social media** apps does not align with COPPA's mandate that children must be at least 13 to use apps collecting their data.
- **The different rating systems used by Apple and Google can be confusing for users**, similar to the situation Nintendo and Sega faced before the establishment of the ESRB in 1994.



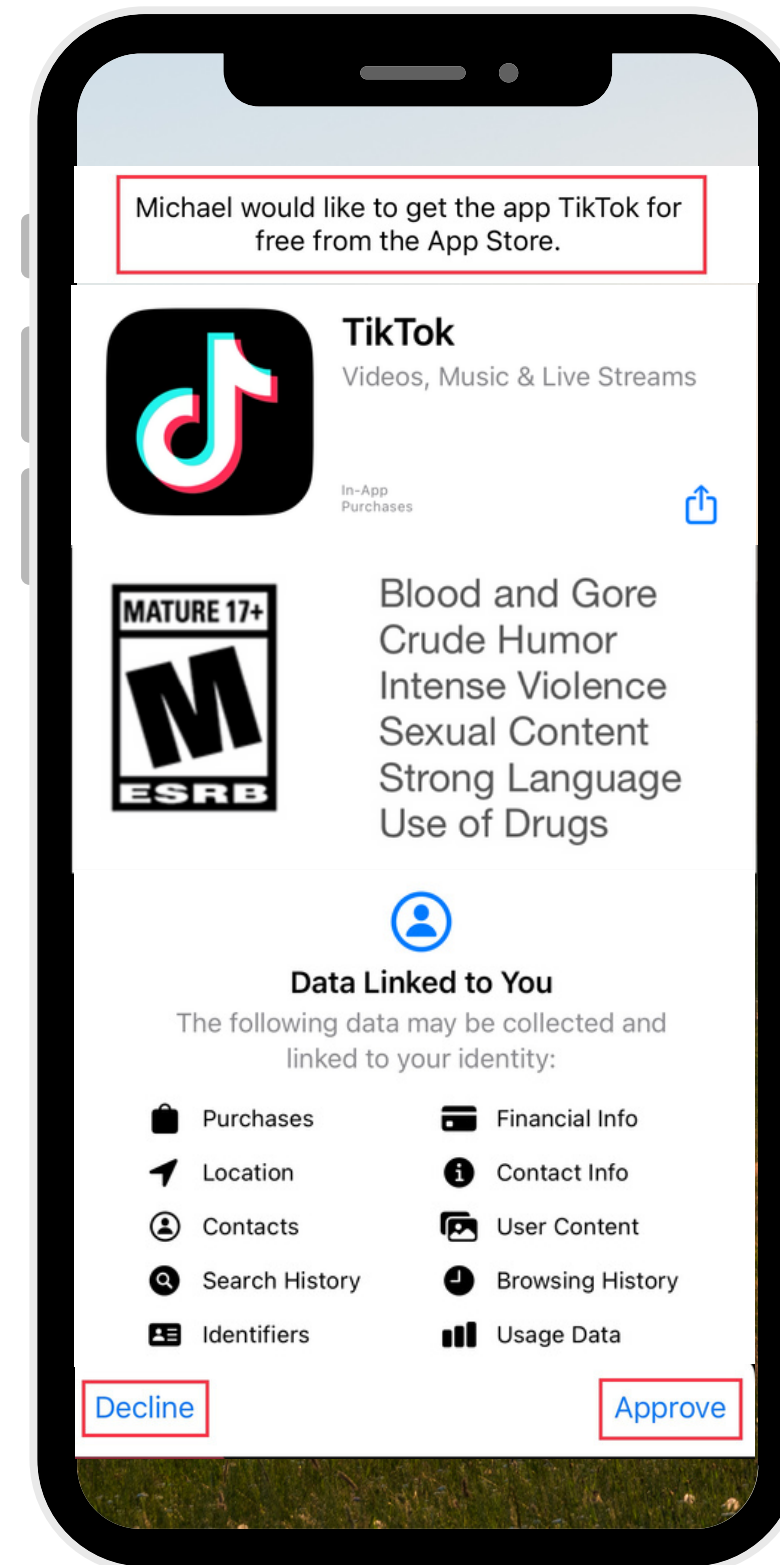
# 2

## Parental consent is not valid if risk disclosures aren't accurate and highly visible

- Ratings, content descriptors, and child contact risks (adults interacting with kids) must be placed prominently above the "approve" and "decline" options to ensure parents have seen and understand all potential risks to their children.
- Apps containing graphic content, harmful algorithms, targeted ads, or that allow strangers to direct message children should be rated as Mature (Google) or 17+ (Apple).
- In-app optional parental controls do not replace default safety features.



HOW APPLE "PARENTAL CONSENT" CURRENTLY LOOKS



HOW "INFORMED CONSENT" SHOULD LOOK

## Consumer laws should prevent companies from engaging in deceptive advertising practices, including Apple

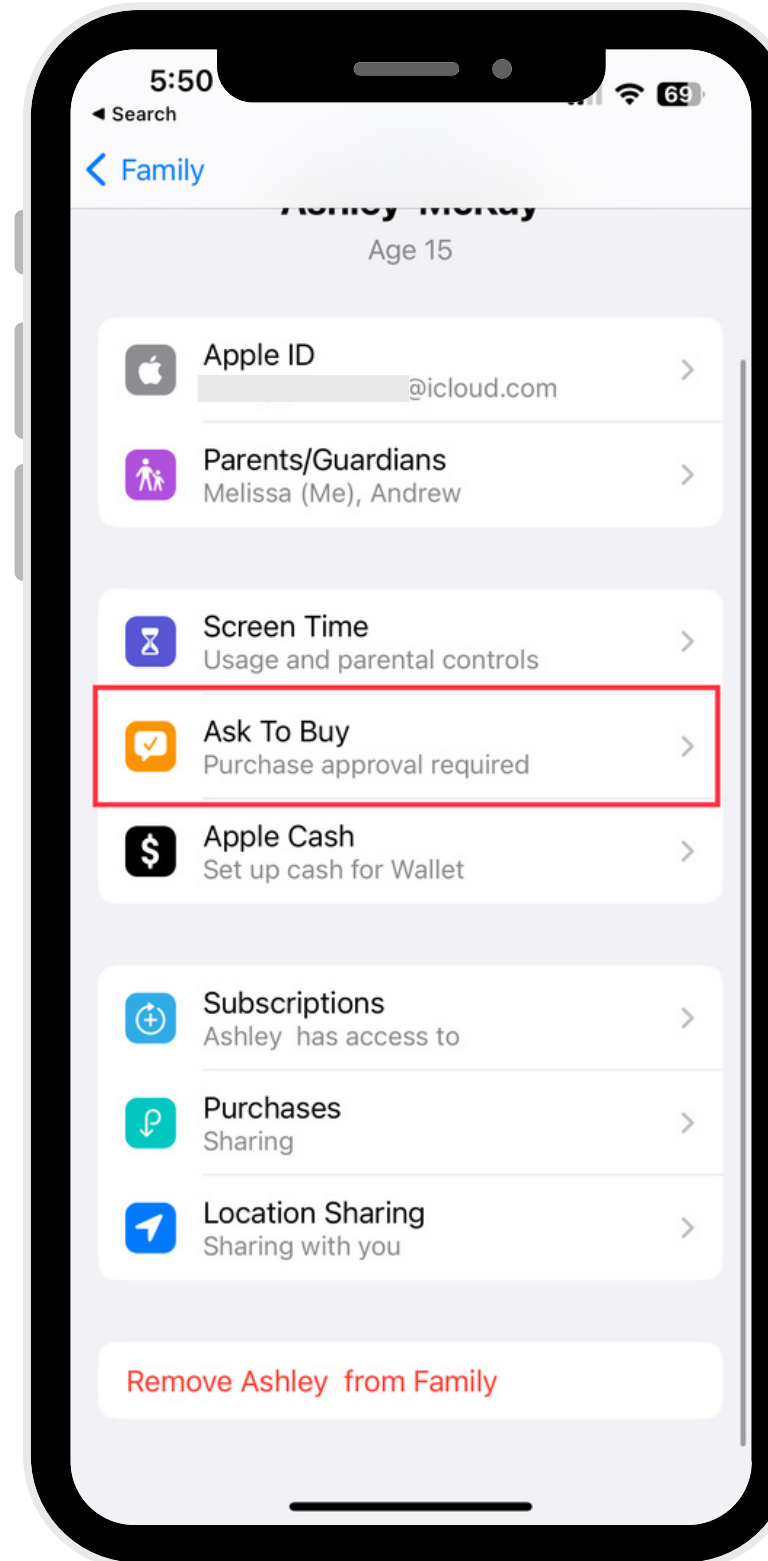
- Apple has been officially on notice about their **deceptive app age ratings since 2019** when a Congressional Hearing was held to address app age ratings and child exploitation. Child advocacy groups also wrote letters to Apple in 2021 and 2023, asking executives to **fix the deceptive app age rating system**.
- In December 2022, fifteen attorneys general wrote a letter to Apple, demanding a higher and more accurate age rating for TikTok. Two weeks later, **Apple unexpectedly lowered the age rating for YouTube** (a similar video-sharing app) from 17+ to 12+ without any apparent justification.
- In 2023, the United States **Surgeon General issued a warning** about the harmful effects of social media on children. No such warning appears in any app store. Most social media apps are rated as safe for children over 12 and carry muted content warnings.



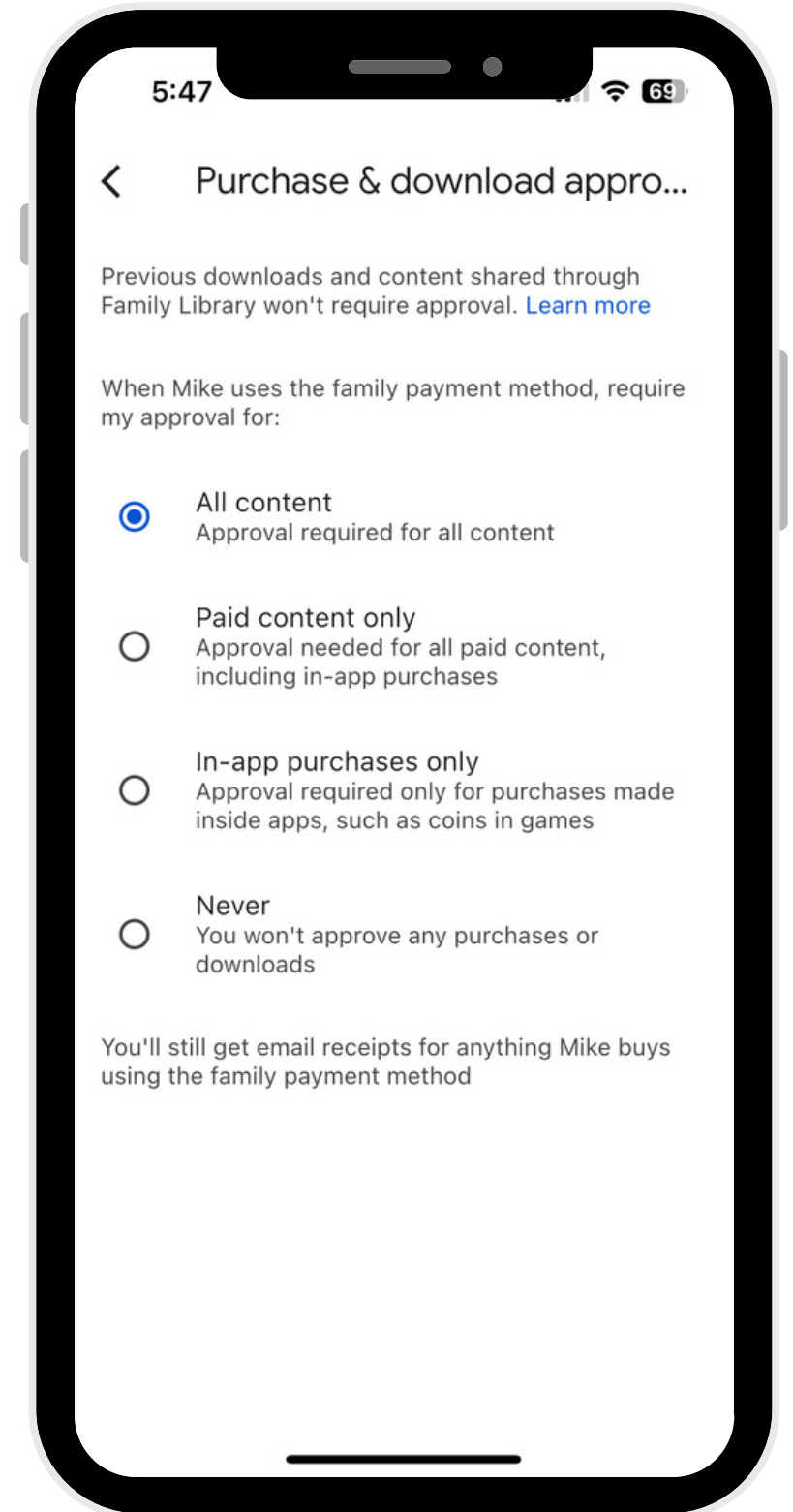
3

## "Ask to Buy" should be the default setting for all social media apps for users under 18

- **Apple's "Ask to Buy" and Google's "Approve All Content"** settings trigger mandatory parental consent for each app downloaded.
- Completed parental consent could be communicated to social media platforms in states where social media consent is mandatory. **App ratings must be fixed to ensure "informed consent."**



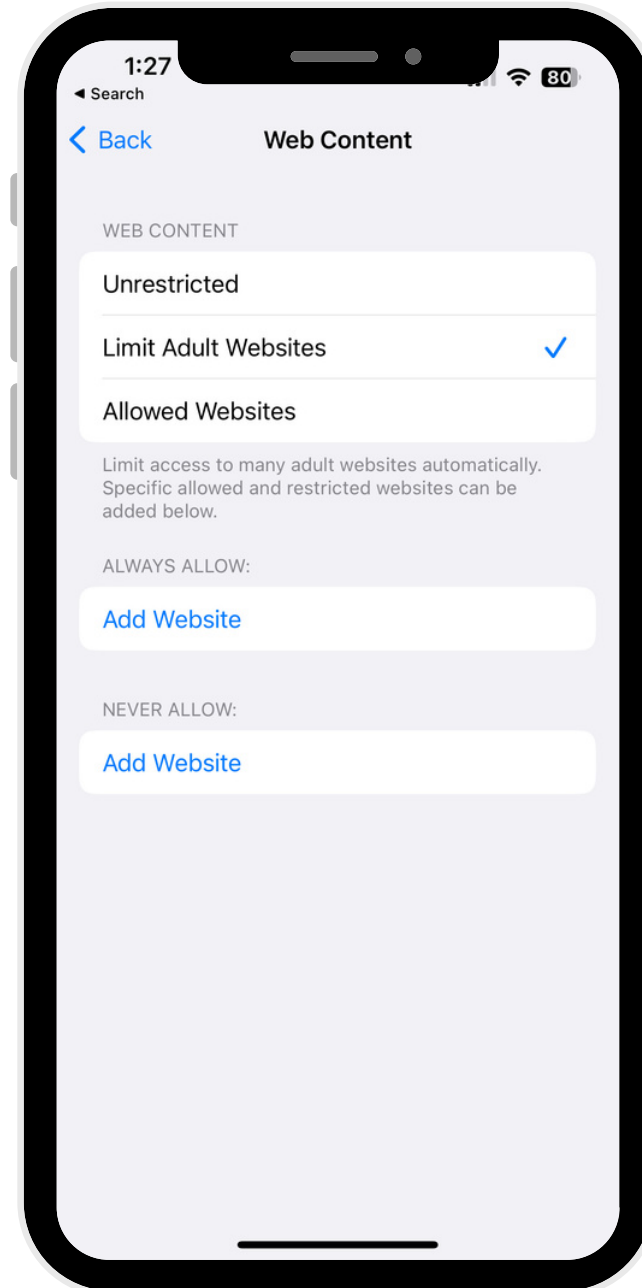
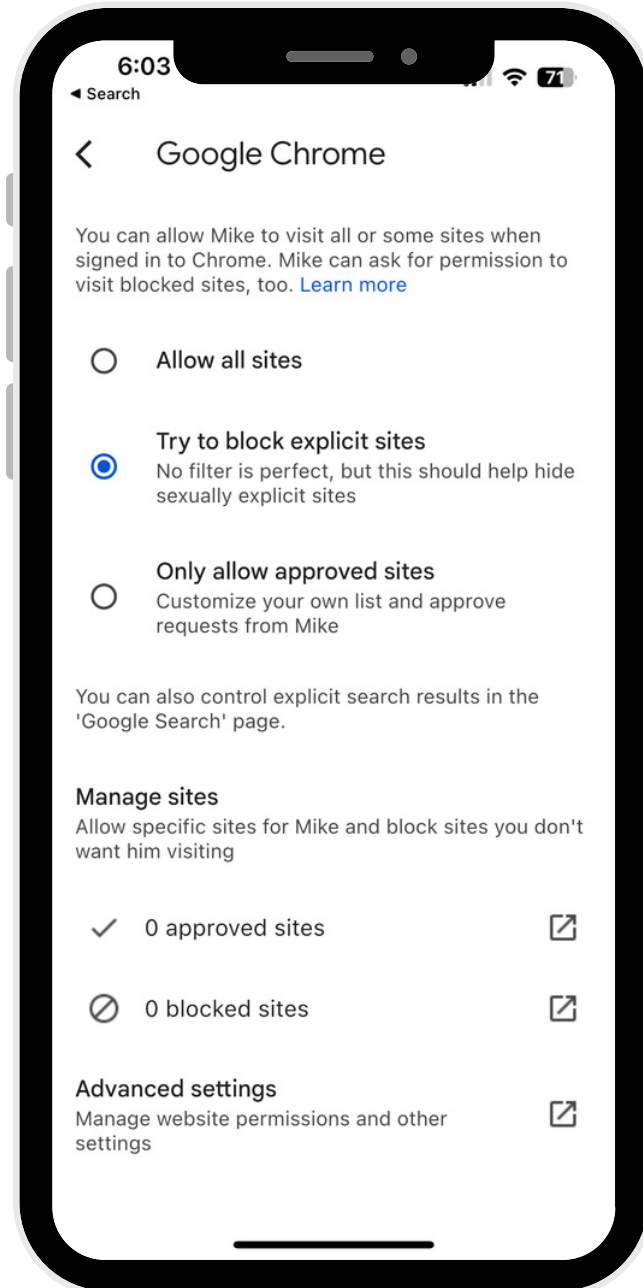
APPLE'S "ASK TO BUY"



GOOGLE'S "APPROVE ALL CONTENT"

# 4

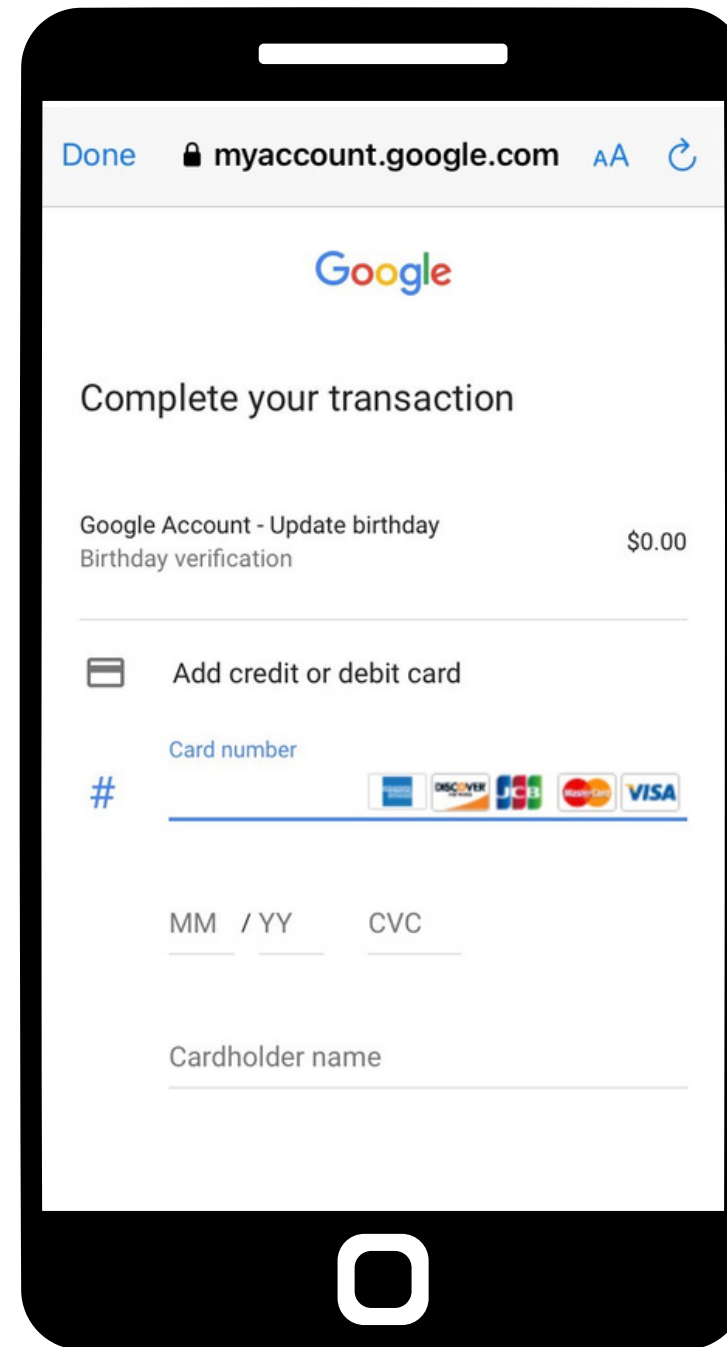
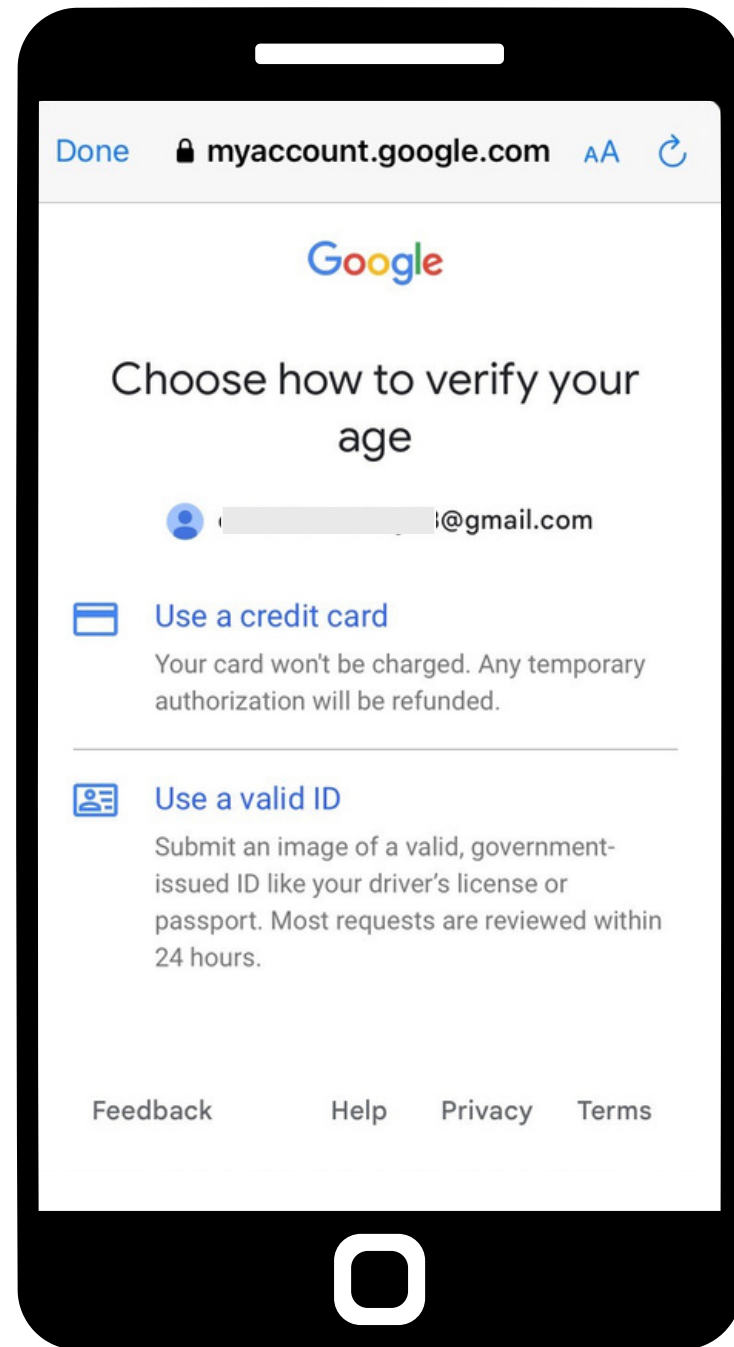
## Explicit adult content should be blocked if the user is under 18 according to the Apple or Google ID birthdate



- **Website-Level Age Verification** doesn't work as well as intended. Only a handful of explicit websites actually age verify while thousands don't.
- **Apple and Google** have the ability to block pornography (videos, website, images) with a near 100% accuracy. Age verification at the device level is critical.
- **"Block Explicit Sites" (Google) or "Limit Adult Websites" (Apple)** should be the default setting for all new devices with a device ID age under 18 unless age verification has been completed.

# 4

## Explicit adult content should be blocked if the user is under 18 (continued)



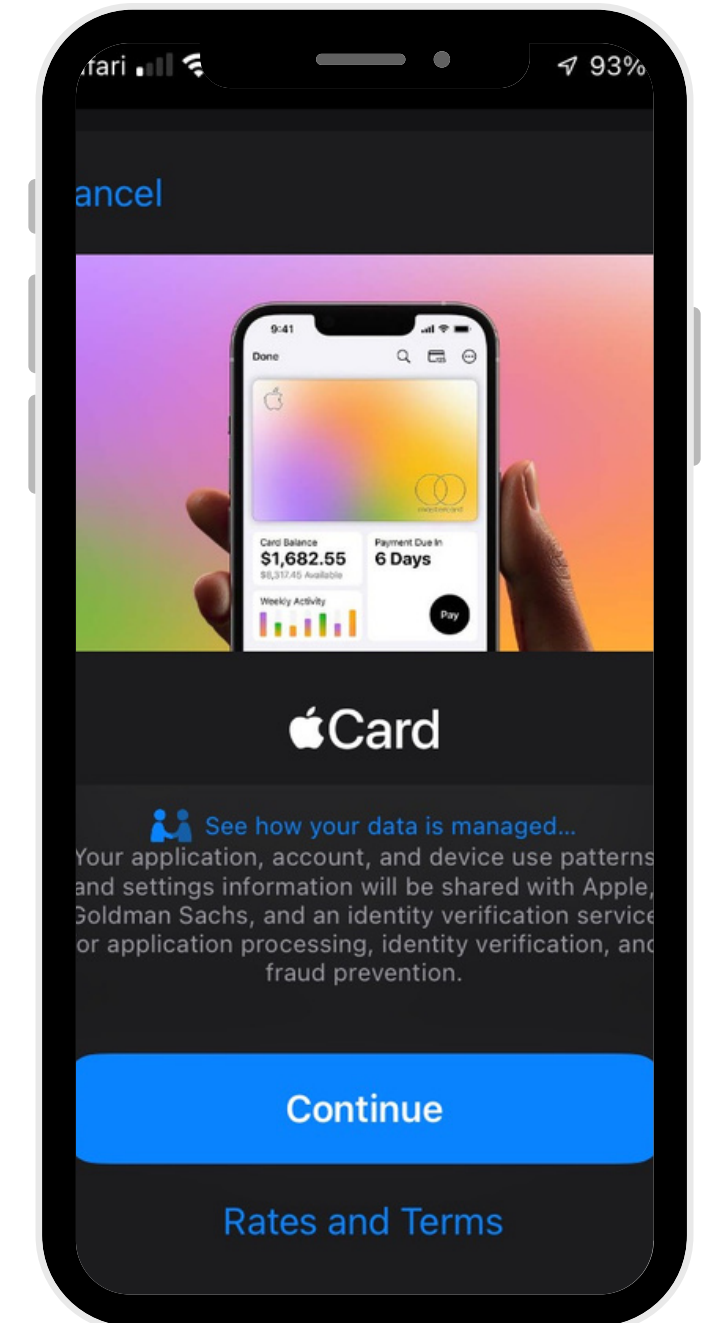
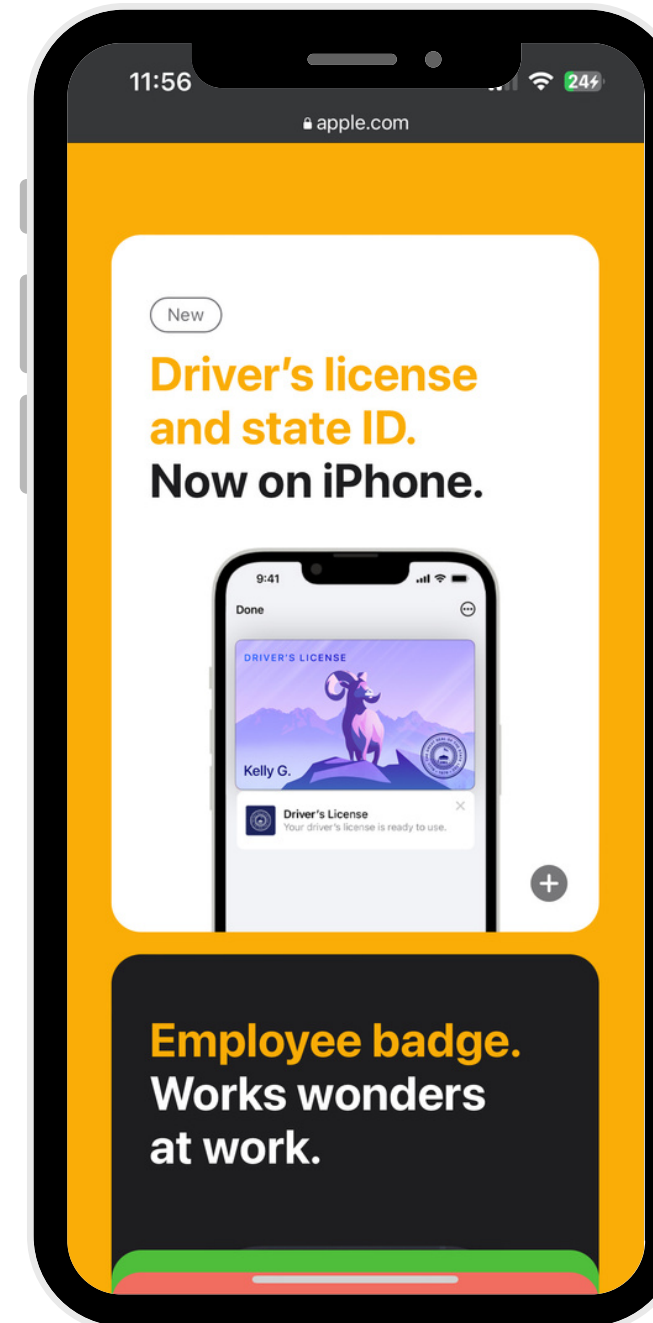
- **Google already requires age verification** when there is a change to the original Google ID birth date that would affect the adult status of the user. Age verification is completed by uploading a valid government ID or with a credit card.
- **Why does Google require age verification** to protect underage kids from having a YouTube channel and Gmail but not from explicit content?

5

# App stores must **incorporate advanced age verification technology** for explicit websites and harmful apps

## Any of these options could provide age verification:

- **Secure Upload of Government ID:** Upload official ID to the Apple or Google Wallet that matches the name associated with the device ID.
- **Apple Credit Card Age/ID Verification Process:** Apple uses the name, address, and birthdate provided for the Apple ID and Apple Pay to verify age with only the last four digits of the Social Security Number. The process takes 60 seconds.
- **Zero Knowledge Proof (ZKP):** In this method, private "digital keys" are employed to transmit sensitive information, such as age. All data, including the user's ID or biometric scan, utilized for age verification, is promptly deleted after the initial verification process, ensuring complete anonymity.



5

(part 2)

## Advanced age verification technology (continued)

- **Biometric Age Approximation Face Scans:** Biometric face scans (like Yoti) can estimate a user's age with 99%+ accuracy. Images are instantly deleted once the age is estimated. Age estimation must match the age bracket of the Apple or Google ID age to be valid.
- **In-Store Age Verification:** In-person age verification could be done for those who don't want to provide additional information. An ID could be presented to an employee of Apple, Google, or mobile phone provider. Upon successful verification, an "over 21" or "over 18" acknowledgment could be attached to the user's Apple or Google ID.

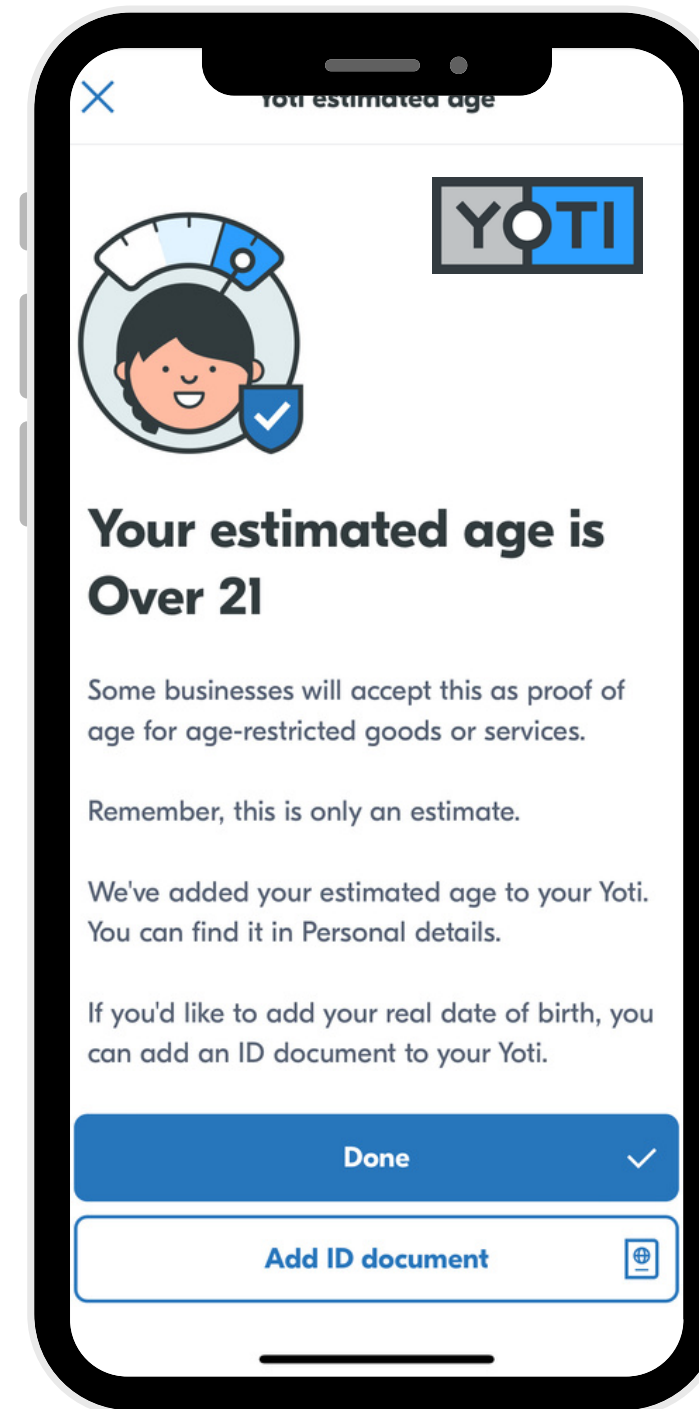
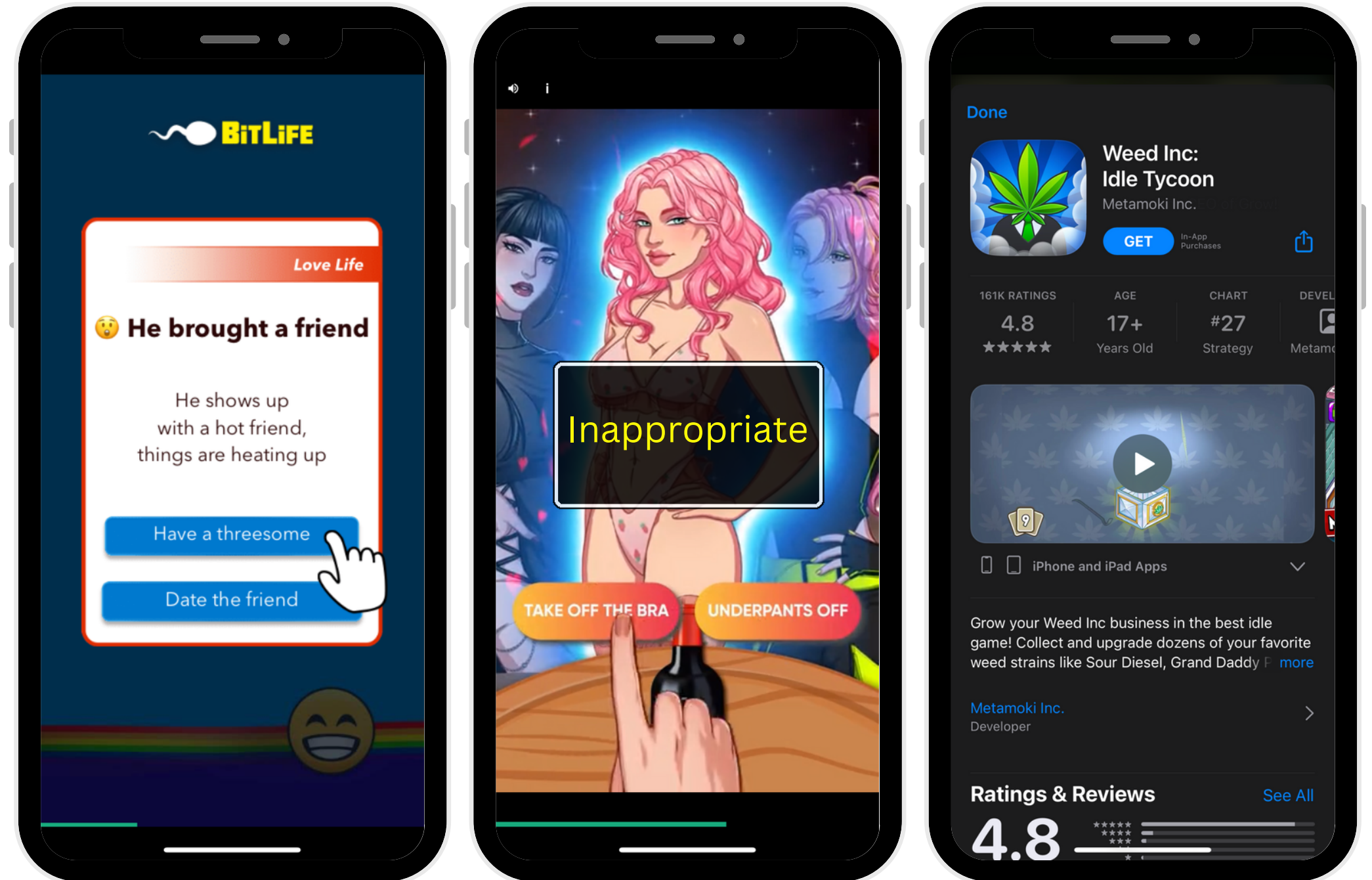


image: <https://support.apple.com/guide/iphone/set-up-family-sharing-iph223f61318/ios>

6

## In-app ads should not promote mature content to kids

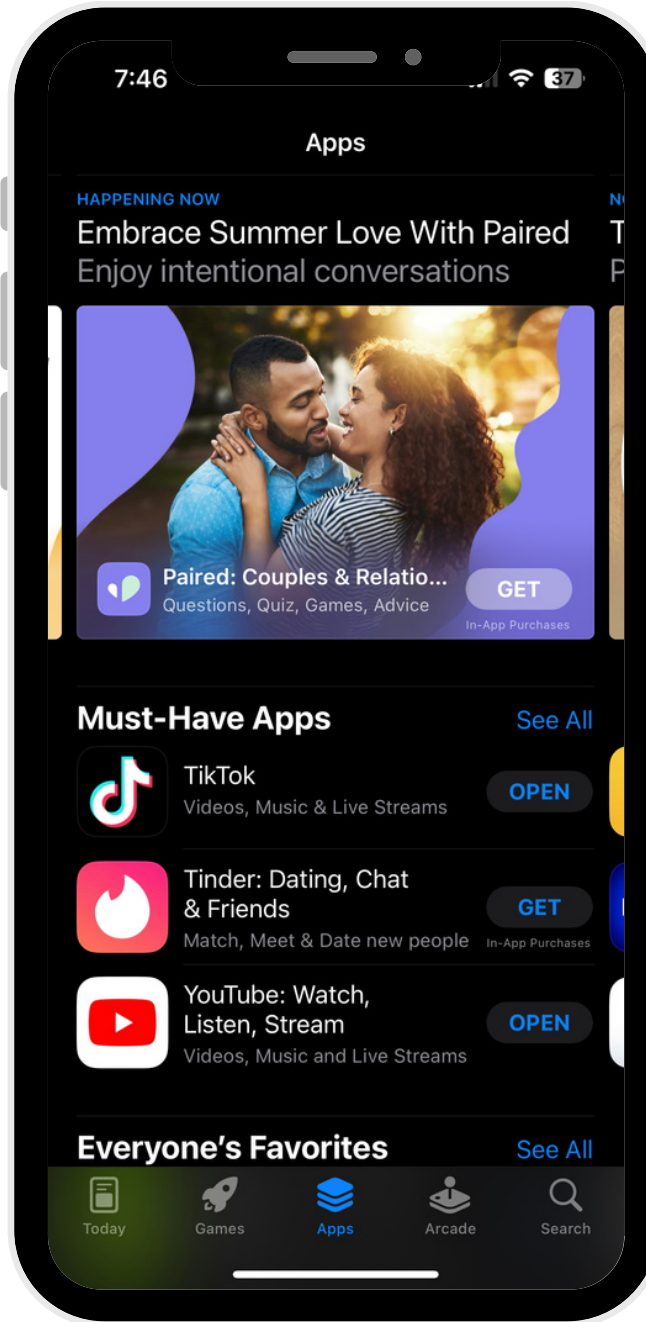
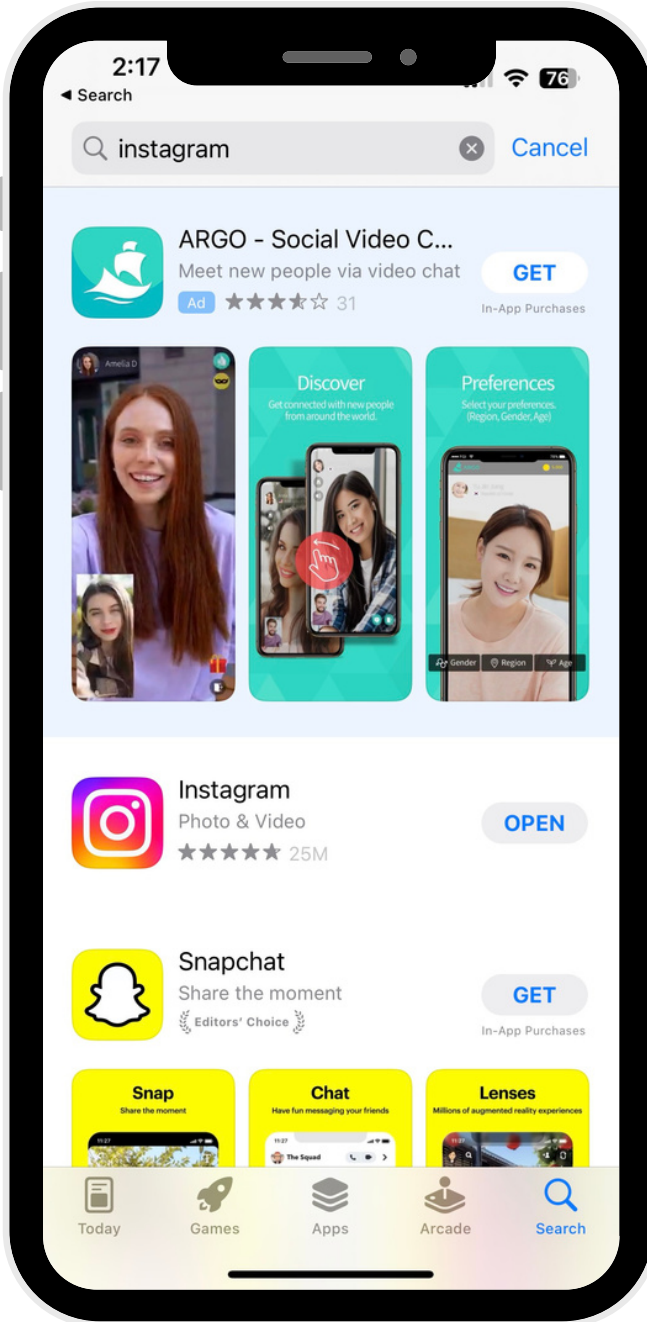
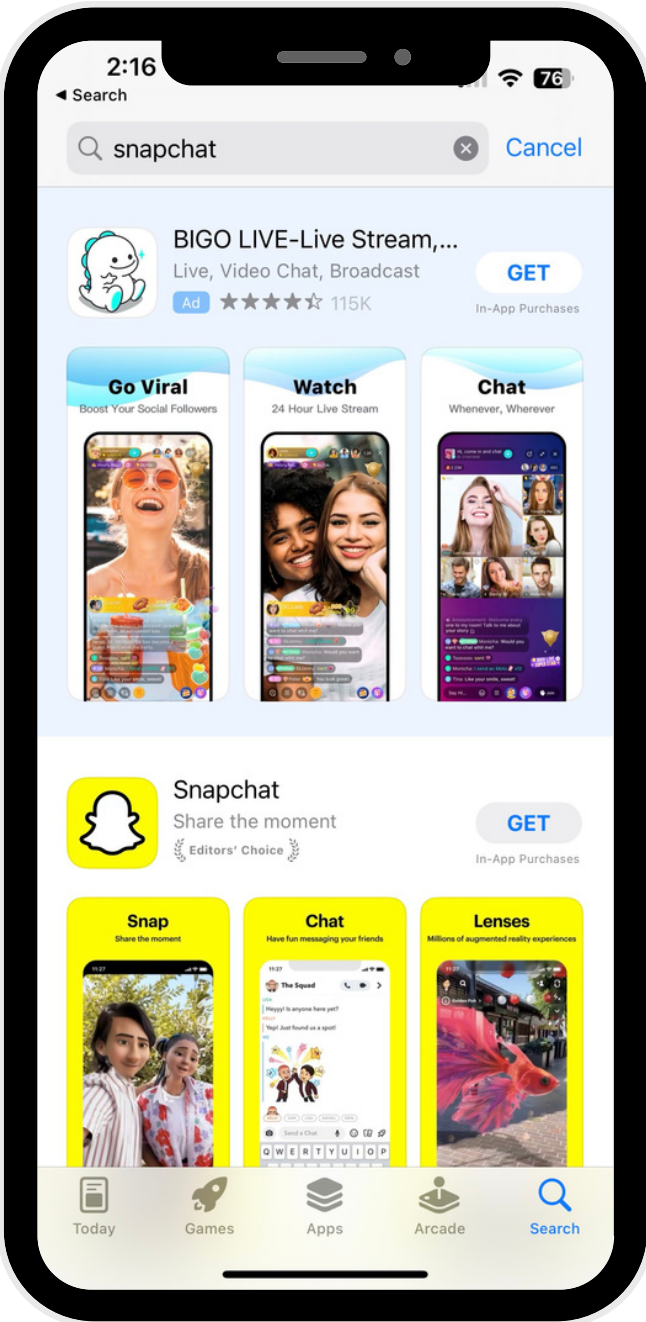
- **In-app ads should not promote mature content in apps** rated lower than 17+ (App Store) or Mature (Google Play).
- **Screenshots represent real ads** promoting gambling, drugs, and sexual content that were shown to a child in a 12+ rated app.





# 7

## Mature apps should not be advertised to children

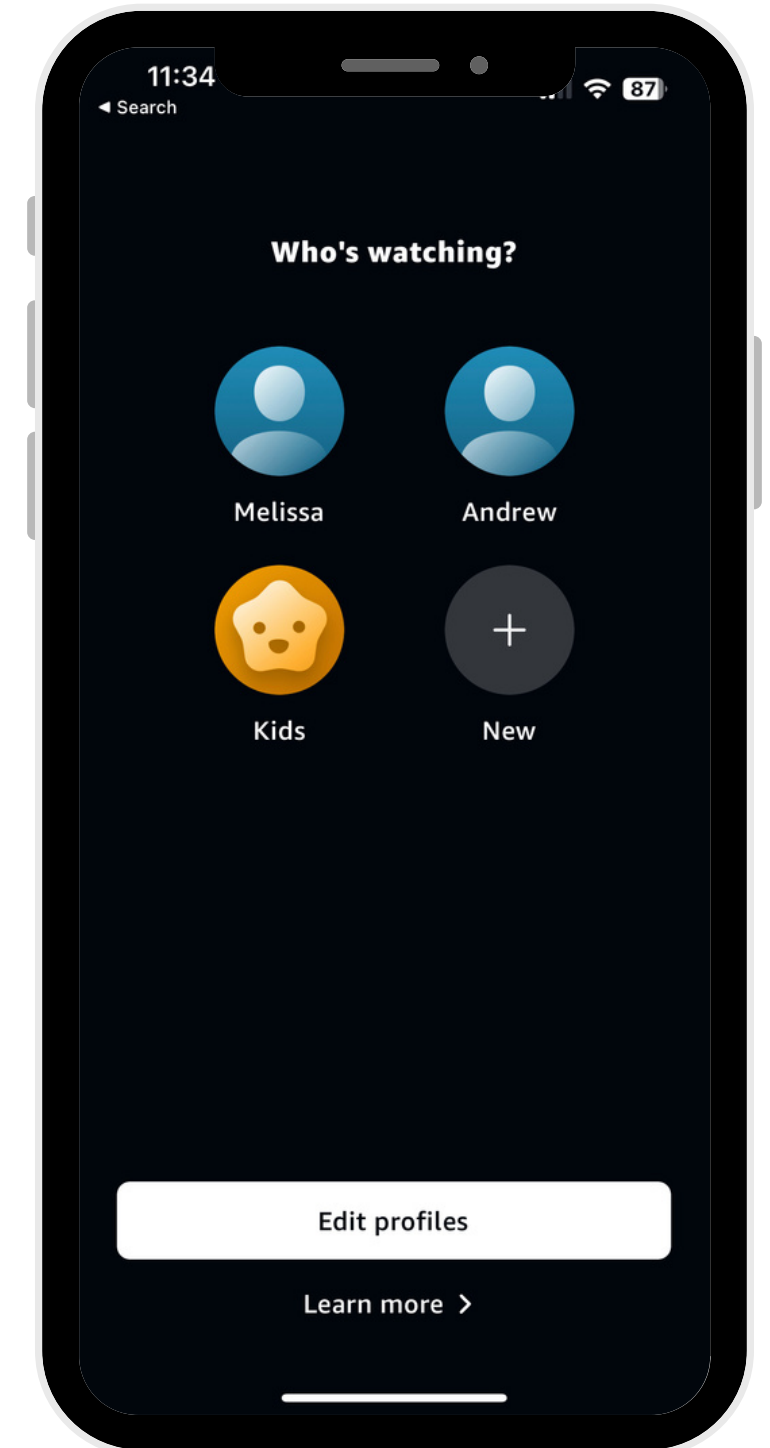
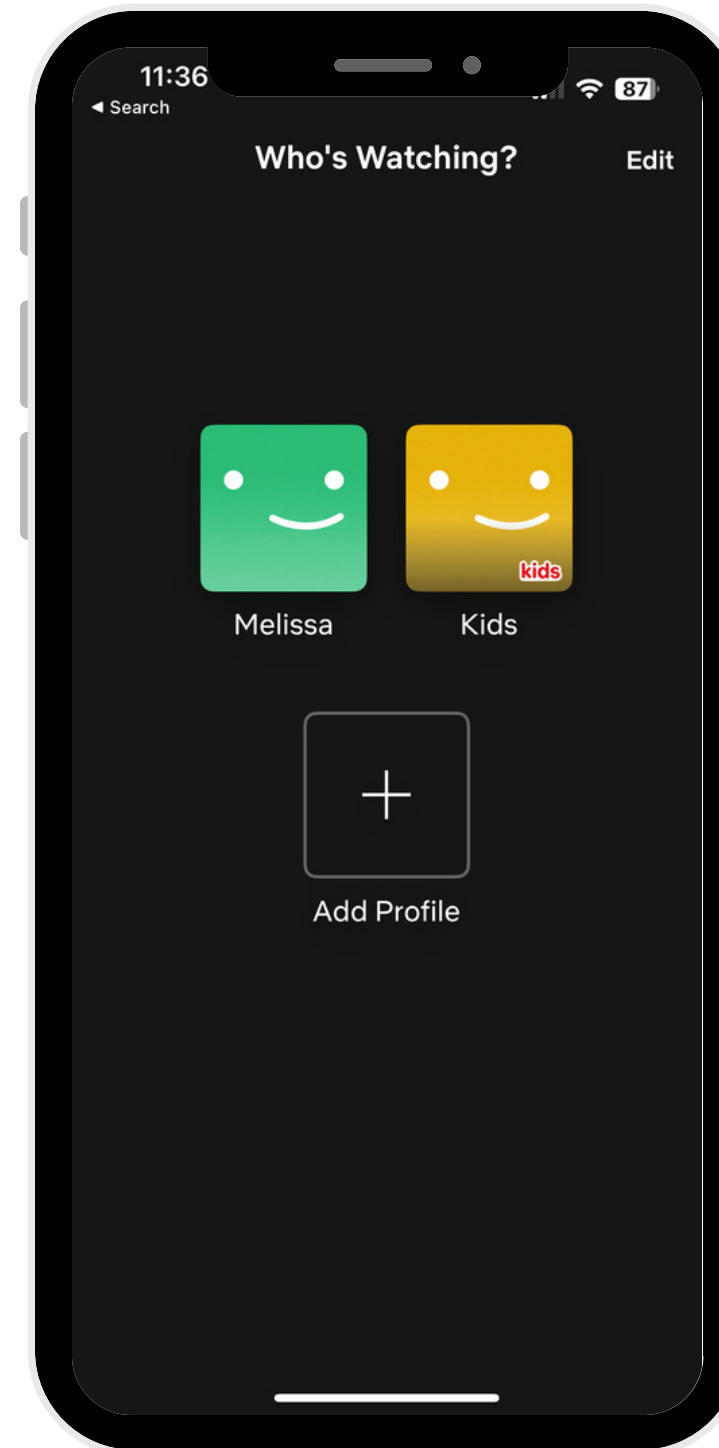


- **App stores must not show or advertise mature (17+) apps** to children under the age of 16 as determined by the Apple or Google ID.
- **Screenshots show how the Apple App Store advertises dangerous 17+ chatroulette** apps to users searching for 12+ apps. It also directed a 10-year-old to download mature apps such as Tiktok, Tinder, and YouTube as "Must Have Apps." These apps are not appropriate for a younger child.

# 8

## Mandate operating systems to create a "shared device" or "child safe" mode

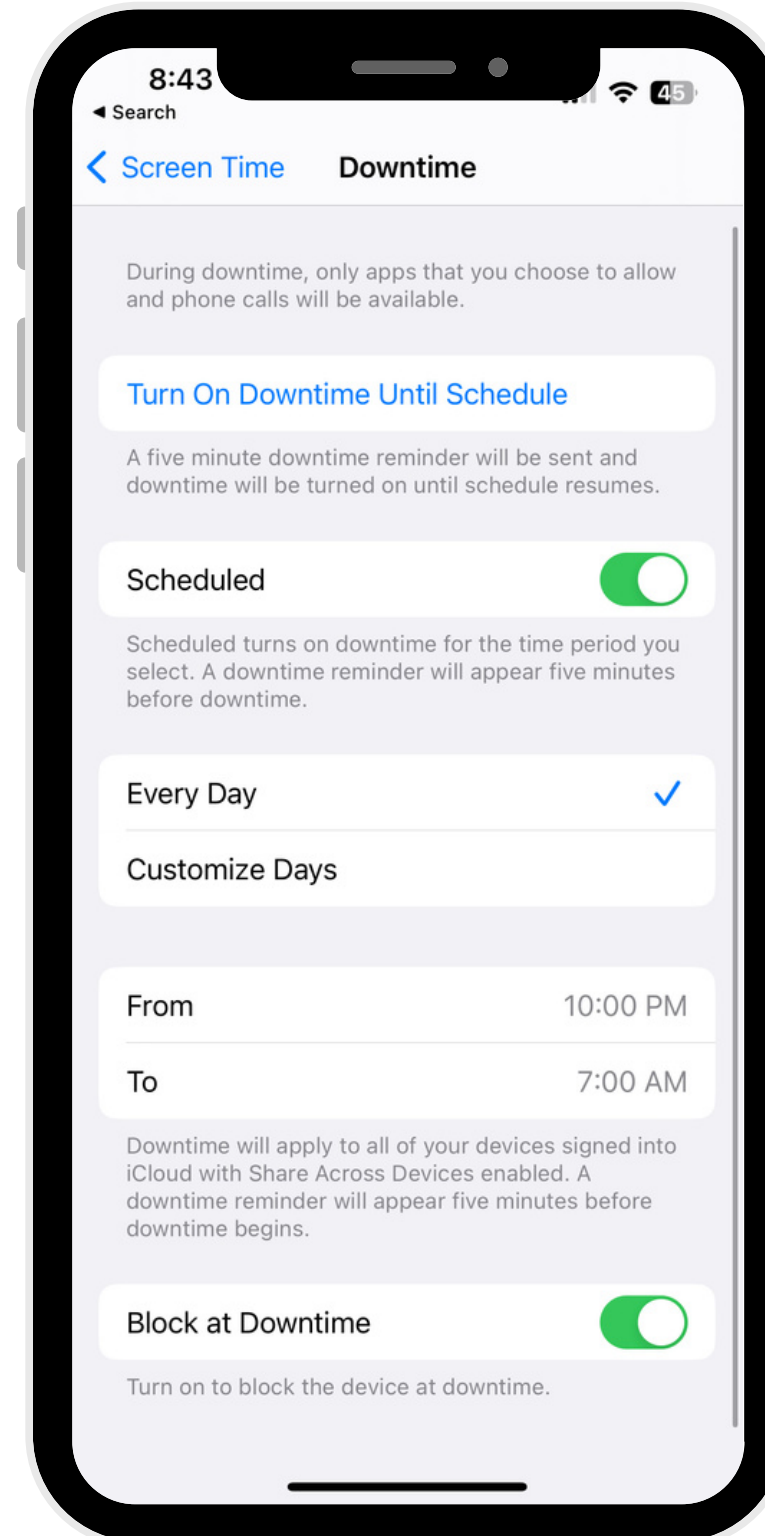
- Netflix, Amazon Prime Video, and many other platforms allow for an age-appropriate experience by enabling different users to login on the same device. Apple and Google should do the same.
- Alternatively, a temporary "child safe" mode could be enabled when a child is using a device that belongs to an adult. This temporary mode should limit explicit websites and 17+ apps.



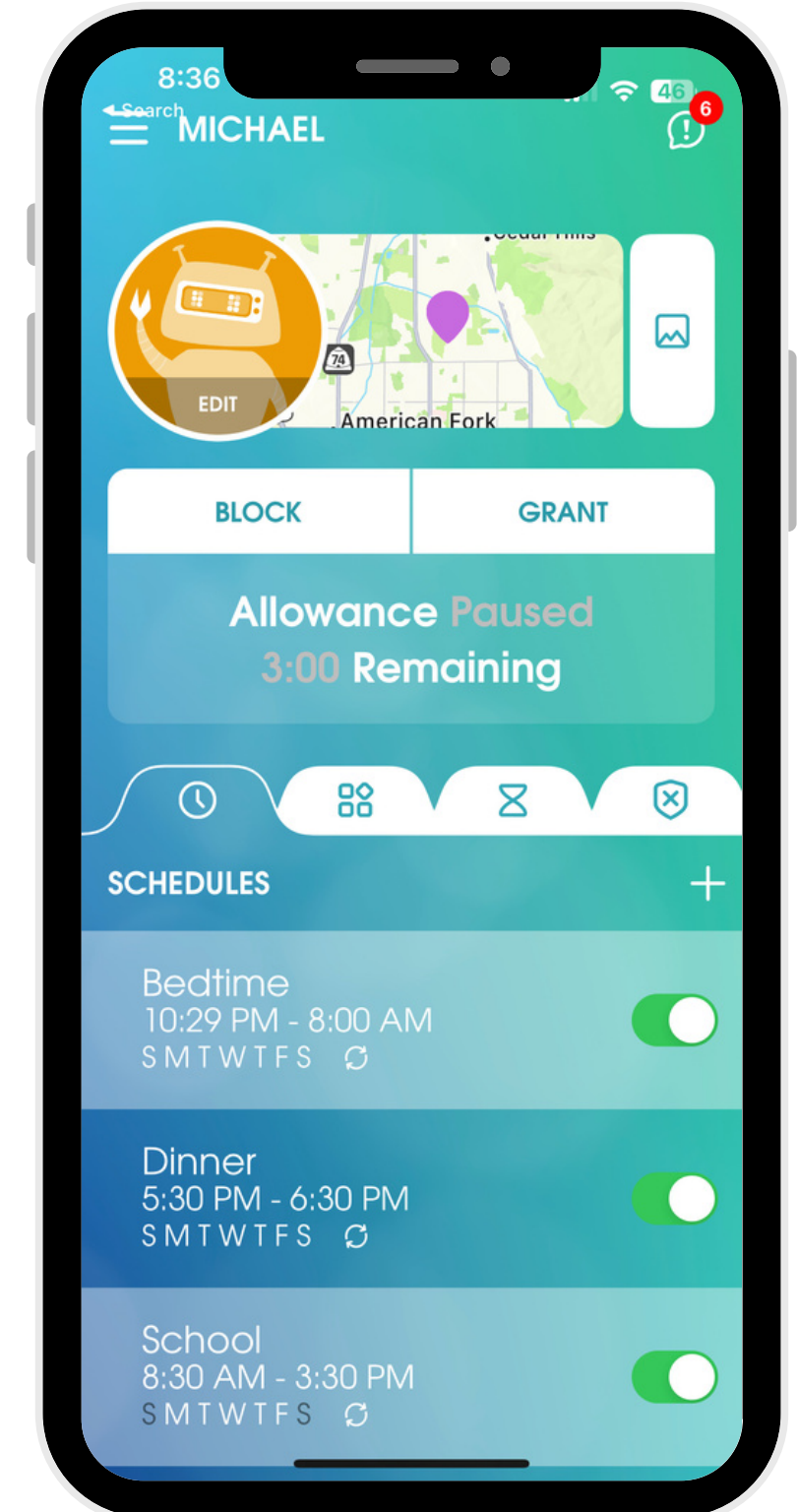
# 9

## Smartphone producers should develop a "school mode" and "bedtime mode"

- **An easily engaged "school mode" could automatically disable all phone functions**, except call, text, camera, and calculator, from 8 am to 3 pm on weekdays. A "bedtime mode" could do the same at night. Downtime features should be intuitive and easily engaged.
- **Push notifications** could be sent to remind parents to engage Downtime features for children under 18.



APPLE DOWNTIME

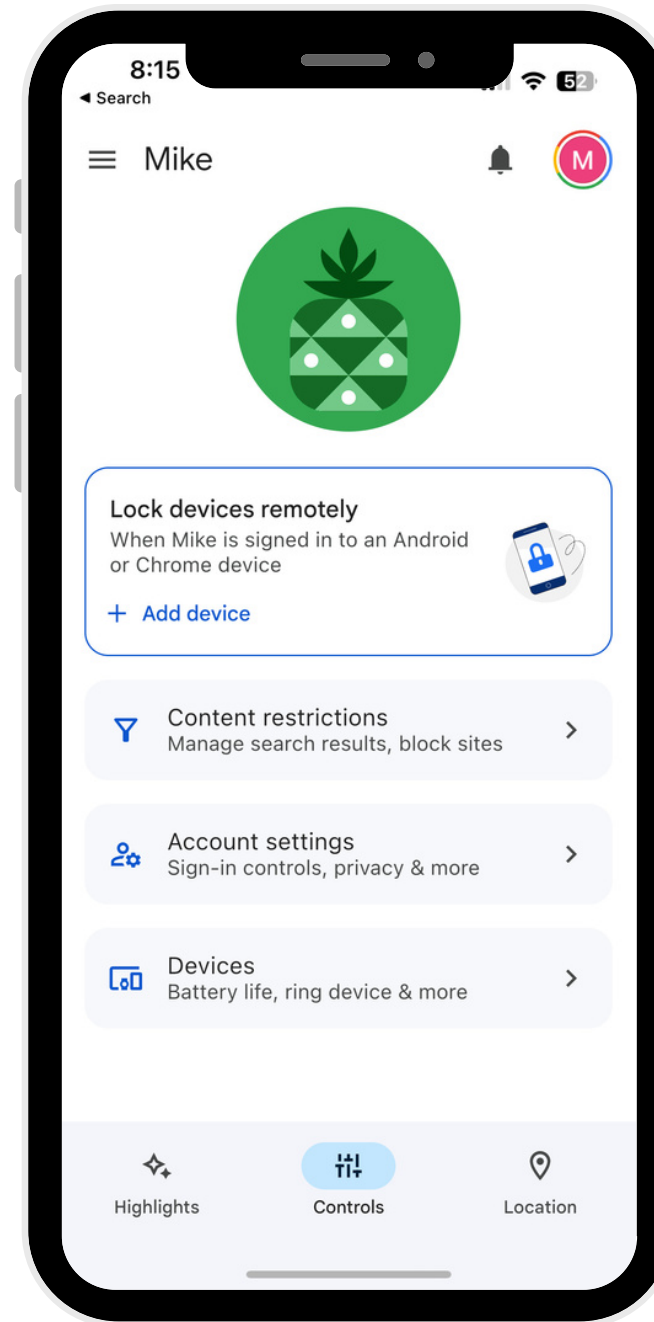


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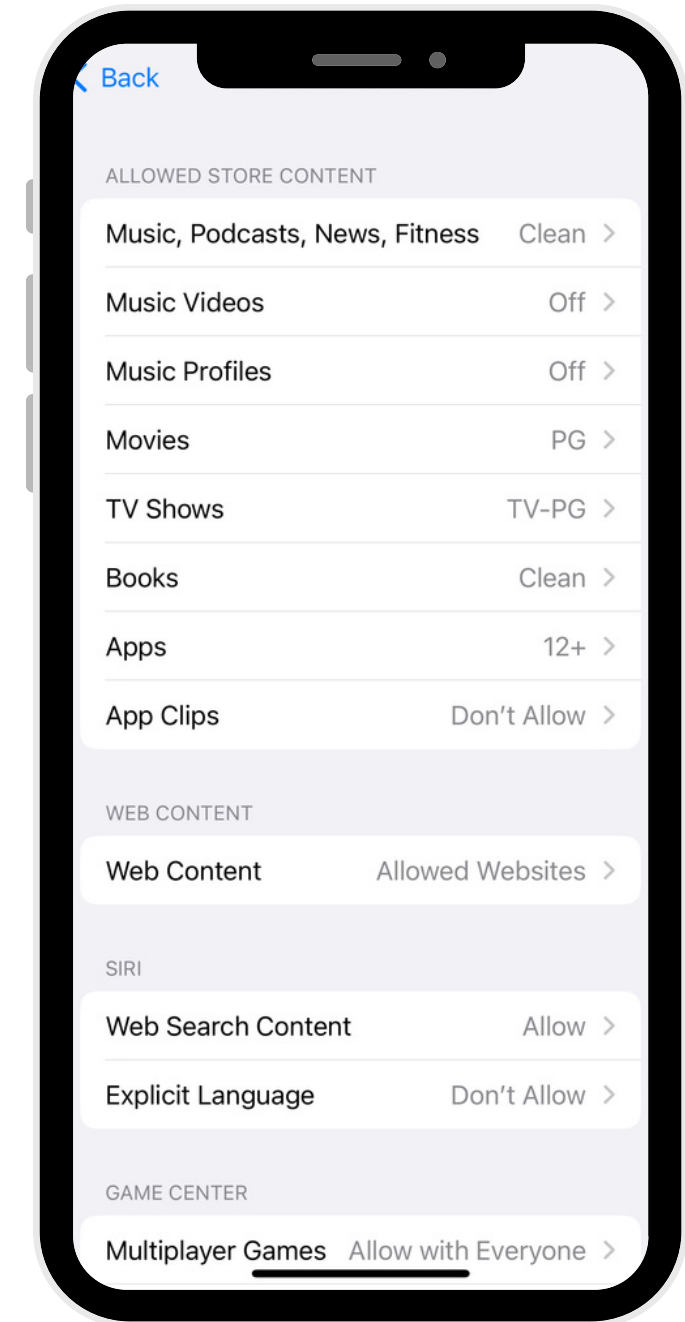
# 10

## Apple Screen Time parental controls should be made into an app

- **Currently, Screen Time is integrated into the iOS ecosystem, creating poor interoperability** functionality for parents who have different phones from their children - for instance, if the parents use Android devices (approximately 42%), while their child has an iPhone (approximately 87%).
- **A standalone app allows for a more intuitive layout** with horizontal and vertical menu options, making it easier to find the various restrictions.
- **An app could receive more frequent updates** and "bug fixes" rather than waiting for iOS updates.



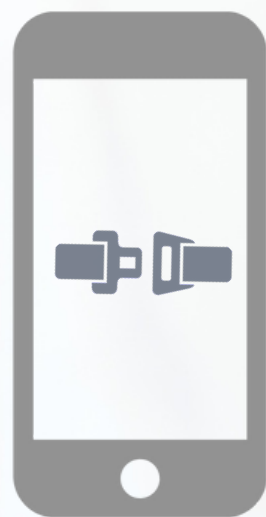
GOOGLE FAMILY LINK (APP)



APPLE SCREEN TIME

# THANK YOU

FOR YOUR DEDICATION TO THE  
SAFETY OF CHILDREN



Age-Appropriate

— SMARTPHONE ACT —



NATIONAL CENTER ON  
SEXUAL EXPLOITATION

