



**CHILDREN-AT-RISK EMPOWERMENT ASSOCIATION
(CARE SINGAPORE)**

**SUBMISSION TO THE MEDIA DEVELOPMENT AUTHORITY OF SINGAPORE
("MDA")**

IN RESPONSE TO THE

**PUBLIC CONSULTATION ON THE REGULATORY OPTIONS TO FACILITATE
THE ADOPTION OF INTERNET PARENTAL CONTROLS**

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Children-At-Risk Empowerment
Association (CARE Singapore)
428 Pasir Ris Drive 6, #01-21
Singapore 510428

T: 65833481 . F: 65817739 . E: care@care.sg . W: www.care.sg
Member of National Council of Social Service; IPC status, Charity Registration No: 1509

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CARE SINGAPORE’S

**RESPONSE TO THE MEDIA DEVELOPMENT AUTHORITY’S PUBLIC
CONSULTATION ON THE REGULATORY OPTIONS TO FACILITATE
THE ADOPTION OF INTERNET PARENTAL CONTROLS**

1. INTRODUCTION AND STATEMENT OF INTEREST

- 1.1. This submission sets out the response by CARE Singapore to the request for comments on the regulatory options to facilitate the adoption of internet parental controls (“IPC”) by the Media Development Authority of Singapore (“MDA”).

- 1.2. CARE Singapore is a voluntary welfare organisation, and a member of the National Council of Social Service (“NCSS”) since our inception in 1997. Our mission is to help youths succeed. We believe that every person is useful and has something positive to contribute. We are appointed by NCSS as a Centre of Specialisation for Youth Empowerment and are one of the leading agencies in Singapore to work with at-risk children/youths and their families.

- 1.3. In recent years, we have worked with many children/youths and their families facing challenges concerning the various influences of the internet, especially through their mobile devices. It has become one of the key elements in our service design and content development.

- 1.4. CARE Singapore’s submission in response to the MDA public consultation paper on the proposed code is structured as follows:
 - 1.1. Section 1 – Introduction and Statement of Interest
 - 1.2. Section 2 – Summary of Comments
 - 1.3. Section 3 – Conclusion

SUMMARY OF COMMENTS

Reference to Section	Description	CARE Singapore's Comments
1.2	<p>Since 23 February 2012, Internet Access Service Providers ("IASPs") are required under the Class Licence to inform and offer optional Internet filtering services to their subscribers at the point of subscription or renewal of their fixed-line residential Internet access subscriptions. This requirement was subsequently extended to cover mobile Internet access subscriptions from 30 June 2012. The Class Licence also requires IASPs to provide reasonable technical support to their subscribers for the duration of their subscriptions. The intent of these requirements is to increase parents' awareness of the availability of Internet filtering services and to make it easier for them to subscribe to such services, particularly parents with children aged 16 years and below.</p>	<p>In our contact with families, it seems like most parents are unaware of this service. This is especially true for those in the lower socio-economic status group, who are less informed and lack access. Hence we recommend to increase public awareness of IPC and various charge options at the community level such as community development councils and community centres.</p>
1.5 & 4.1(c)	<p>Provide network level Internet parental controls by which the content is filtered, with device level Internet parental controls left to the IASPs' own commercial considerations on whether to offer consumers an alternative</p>	<p>With regards to the types of family whom we work with, a network level filtering is preferred. This is so that parents will not find it cumbersome to take the necessary precautionary actions. However, other adult end users should be given the choice to filter content either at the network or device level.</p>

Reference to Section	Description	CARE Singapore's Comments
4.1 (a)	Obtain consumers' explicit decision on whether they want Internet parental controls (i.e. Required Decision) at the point of subscription or renewal of fixed-line and mobile Internet access	We support MDA's recommendation (2.6). This will help less motivated parents to benefit readily. Consequently, this would increase their parental involvement and equip them with relevant knowledge.
4.1 (b)	Filter "adult content" by default when Internet parental controls are switched on, with additional content categories left to the discretion of parents	In principle, we agree that the filter should be set by default. This is especially so for parents with children below the age of 16. On the other hand, other adult end users should be given a choice to opt-out. Regardless of the eventual control, "adult content" and "additional content categories" must be defined explicitly in accordance to our Singapore legalities. For instance, reference can be made to current film ratings.
4.1 (d)	Offer to consumers at least a version of Internet parental controls free of charge with the subscription of any Internet access package	Internet parental controls should be offered free of charge to protect all minors in our society. Many of them spend excessive time on the internet owing to reduced parental supervision at home, especially those who are from dual-income families. This would eliminate the issue of low income families being excluded from the facility due to cost factor.
4.1 (e)	Complete the switch on of Internet parental controls for new/ re-contracting subscribers at the point of sale and facilitate the switch on of the Internet parental controls for existing subscribers.	For the current conditions, we support the idea of completing the switch on of the IPC at the point of sale for new/re-contracting subscribers. For existing subscribers, additional technical support should be provided for the less tech-savvy consumers via CDC and CC.

2. CONCLUSION

- 2.1. It is necessary for MDA to take a proactive approach such as instituting nationwide IPC as a safety precaution for our young population. Implementation wise, it should be easy and hassle-free for parents to adopt. Making such tools readily available free-of-charge for all would help increase parental involvement in the area of internet safety for their children.

- 2.2. To maximise its benefits and be able to reach all citizens, we propose for MDA to increase public awareness and education on IPC, internet safety and its impact on children/youths. This can be done in an extensive manner throughout the year.

- 2.3. Nonetheless, having just the technical information of internet safety is not sufficient. As part of the campaign, values education should be included. Children/youths will benefit from increased parental guidance to discern internet contents, regardless of filtering. For example, family life education in schools is one possible platform to expand parents' knowledge and abilities to address internet usage issues with their children.

- 2.4. In conclusion, we support the proactive measure initiated by MDA for the benefits of communities at large; paying attention to educational and financial factors of setting up IPC that is significant for the young.