Recommendations for platforms: Youth, privacy and consent

Young people have strong feelings about how online platforms receive and use their data. MediaSmarts' research project *Young Canadians Speak Out: A Qualitative Research Project on Privacy and Consent* gave youth the chance to consider, discuss and design ways of obtaining consent online that are clear and meaningful to them. During that process, the youth participants developed recommendations for how platforms should change data collection and retention policies for young users, how they should obtain consent for data collection, and how they should use the data they collect.

Involve youth in designing practices and methods

Research has consistently shown that the ways online platforms currently obtain consent from young people does not accord with the ways they think of privacy or the ways in which they use digital technology. While this document aims to provide some guidance to platforms for making consent more relevant and meaningful for youth, MediaSmarts recommends that **all platforms with a significant number of young users should develop a process for involving youth** in the ways that they obtain consent and that they collect, retain and use data from young users.

Recognize the distinct needs of youth

While legislation and regulation in some jurisdictions provides special protections for children below a specific age, participants felt strongly that **all young people need a distinct consent process** that would respect their developing understanding of the data economy and the increased risk of long-term consequences of data collection.

The recommendations below are features of their proposed youth-focused consent process.

Make policies easier to read and understand

Youth overwhelmingly agree that terms of service and privacy policies are **too difficult to read and understand.** As a result, many say they have no alternative to simply clicking "I Agree" without any understanding of what they are consenting to.

To prevent this, youth recommend:

- **Simplifying** text, by using shorter words or sentences and providing text features such as subtitles or bullet points to identify key points
- **Highlighting** key points through the use of colour or bold or underlined text
- Providing **youth-friendly** summaries of policies written to match age and reading comprehension levels, which would include links to the full policy for those who wish to read it
- Framing policies and consent processes in **contexts that are familiar to youth**, such as an Instagram poll or the toggle switches used for phone settings

Verify that consent is meaningful

Young people feel that platforms should do more to verify that users have genuinely understood the policies they are being asked to consent to. Youth-designed methods for doing this include:

- Checkboxes for each section of the policy, rather than a single checkbox for the entire policy, to **make it more difficult to skip the text and click 'I Agree'**
- Making it impossible to click on 'I Agree' before a certain amount of time has passed, to **make sure that text stays onscreen long enough to be read**
- Reminding users of the policies they have consented to when they make choices affected by those policies, such as a **pop-up reminder** when posting a photo
- Quizzing users on their understanding of the policy, in order to **confirm that consent is meaningful before obtaining it**
- Requiring users to read and consent to the policies before they download an app, create a profile or otherwise invest time, and then **re-confirming consent** after the registration process:

  "By the time it comes around to the consent you have already downloaded the app and you don't have more time." (Youth participant)

Provide more control over what data is collected

Youth want more control over what data is collected from them and how. In particular, they asked for:

- **Just-in-time notifications** to inform them about how data would be collected or used before making a specific choice; for example, **informing them when the user first posts a photo** of how long a photo would be kept on a platform's servers, what data would be collected from it and what that data would be used for, **rather than when registering for an account**
- "Unbundled" consent, allowing young users to **consent to** *some* **forms and uses of data collection but not others**

   "Instead of just one sentence that says I Agree, it has a bunch of different sentences and you have to click I Agree to each one." (Youth participant)

Make it easy to revisit consent

Part of control is having the opportunity to change your mind. Youth feel strongly that **it should be easy to change their data collection preferences after they have begun using the app** and that platforms should **make it easy to fully remove their data and other content**, such as by removing photos the user has deleted from the platform's servers.

Be more transparent about why data Is collected and how it will be used

Youth are as concerned about how their data will be used as they are about what data is collected. In particular, they want to know whether the data that is collected will only be used by the platform or whether it would be shared with third parties, such as data brokers, which could lead to more long-term consequences. Based on this MediaSmarts recommends that platforms be transparent about what will be done with data that is collected; **a promise that data will not be shared with third parties may even be a "selling point" for youth** who are increasingly concerned about their privacy and the future consequences of data collection.