



CHILD APP AND PROTECTED EQUIPMENT CAMPAIGN

*Two simple solutions could
change everything.*

Prepared by:



#FIXAPPRATINGS

CREATING SAFER DIGITAL
PLACES FOR KIDS

FixAppRatings.com

#FIXAPPRATINGS IT'S FOR THE KIDS

App ratings and descriptions are inaccurate, inconsistent, and do not provide enough information about app content for parents to make decisions about what might be appropriate for their children. No one is being held accountable, and children are the ones who are paying the price.

Popular social apps like Snapchat and Instagram, both rated 12+, are exposing children to mature content and luring them into dangerous and potentially exploitive situations. Pornography, drugs, and other illegal content are common and can be easily discovered.

In addition, certain features make these apps inherently unsuitable for young teens. With Instagram, strangers can direct message children, including those who have a private account. In Snapchat, “Premium” accounts are used to sell pornography from within the app even to children. Pop-up ads for mature games appear on child gaming apps. Most parents have no idea about this content and these features. It is imperative that app ratings and descriptions accurately and completely reflect this reality.

In this booklet, the Fix App Ratings Team will clearly explain the dual problems of broken ratings and complex parental controls, and two simple solutions that could change everything. It's time to hold big tech accountable for their ratings, descriptions, and app content. It's time to create parental controls that are foolproof and simple. For our kids, it's time to do something.



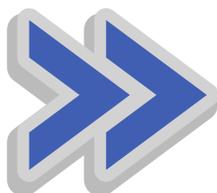
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THE FIRST PROBLEM: APP RATINGS AND DESCRIPTIONS ARE BROKEN

Apps are largely self-rated by the developers themselves and ratings are not enforced for accuracy.¹ Long ago, we decided that an unbiased rating system was necessary to help parents determine what entertainment would be appropriate for their children. Movies (MPAA) and video games (ESRB) are both subject to a third-party rating. It's time for top apps to follow suit.

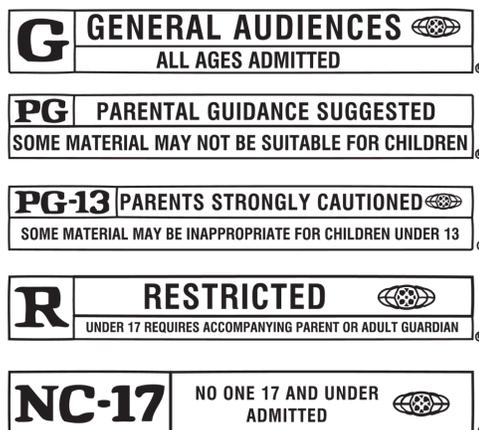


How can parents effectively protect their kids if they aren't accurately informed of app content and risks?

ESRB²

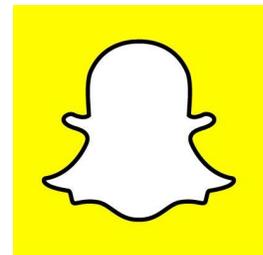


MPAA³



THE FIRST PROBLEM: APP RATINGS AND DESCRIPTIONS ARE BROKEN

Instagram and Snapchat are rated 12+ in the App Store, but are both full of porn, drugs, and have become hotspots for child exploitation. ^{4,5,6,7}



CURRENT APPLE APP STORE DETAIL:



Instagram
Instagram, Inc.

UPDATE

4.8 ★★★★★
12M Ratings

#2
Photo & Video

12+
Age

Age Rating

12+

Infrequent/Mild Profanity or Crude Humor
Infrequent/Mild Sexual Content and Nudity
Infrequent/Mild Mature/Suggestive Themes
Infrequent/Mild Alcohol, Tobacco, or Drug Use
or References

Overly generic



This level of detail is incomplete and does not accurately state the app's real risks by using overly generic descriptors.

THE SECOND PROBLEM: PARENTAL CONTROLS ARE OVERLY COMPLEX

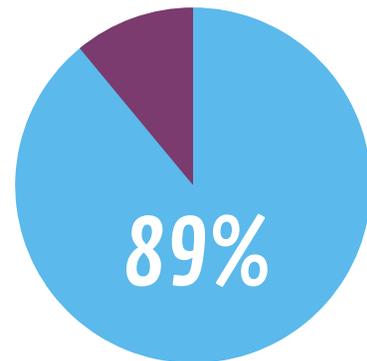
Large tech companies bear some responsibility to ensure their devices provide for the safety and well-being of children, families, and communities at large.

Parental safety controls on popular devices are overly complicated, full of loopholes, and can largely hinge on app ratings, which are currently broken. ⁸

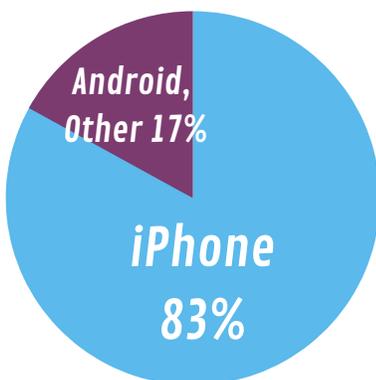
The Washington Post

The Switch • Review

We tested Apple's iOS 12 Screen Time parental controls. First came tears — then frustration.



Teens with
Smartphones ⁹



Teen Devices ¹⁰

It takes over 30 steps to set up parental controls on an iPhone. Google's parental controls for Android devices and Chromebooks are not intuitive. As a result, even well-intentioned parents are left confused and children are often left unprotected. Defaults give children access to NC-17 content and the entire internet, even when the exact age is used during set-up. ^{11,12}

THE SECOND PROBLEM: PARENTAL CONTROLS ARE OVERLY COMPLEX

Large tech companies bear some responsibility to ensure their devices provide for the safety and well-being of children, families, and communities at large.



Teachers are becoming increasingly frustrated as students are constantly distracted by their devices, test scores are dropping, and tech assisted cheating has become rampant. Teens are sleeping less now than ever before, largely due to devices. ^{13,14,15}

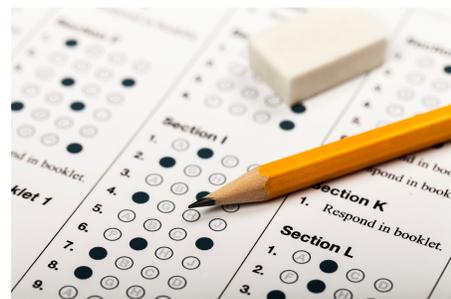


By Alexa Lardieri, Staff Writer July 27, 2018

Electronics in the Classroom Lead to Lower Test Scores

“Phones are making a mess of schools and bedtimes. We invest billions of dollars into education that is now less effective. We need an easy "school mode" and a "bedtime mode" that will shut off all distracting apps while leaving call and text functions working.

Melissa McKay, Child Advocate



THE SECOND PROBLEM: PARENTAL CONTROLS ARE OVERLY COMPLEX

Large tech companies bear some responsibility to ensure their devices provide for the safety and well-being of children, families, and communities at large.

Without age verification, iPhones and social media assume all users are adults, leaving settings and defaults open. This exposes children to mature and exploitive content and dangerous situations. Current defaults include:

iPhone

- Unfiltered Safari (browser).
- Explicit lyrics on music.
- Mature book titles.
- NC-17 movies.
- 17+ apps in the App Store.
- Editable Apple ID.
- Explicit Siri searches.
- AirDrop = everyone.
- **Privacy settings set to "allow" for everything.**

Snapchat

- Quick Add provides your private account name to strangers.
- **Ad preferences toggled on, feeding my web activity to Snap.**
- **Anonymized location data shared with map providers.**
- Friend suggestions based on app usage.
- Discover news content shows all popular titles, including highly sexualized content.

Instagram

- New accounts are set to public.
- IGTV live videos set to "everyone."
- Direct messages from strangers cannot be turned off.
- Allows comments from "everyone."
- Hide offensive comments "off."
- Message replies from "everyone."
- "Show activity status" toggled on.
- **Ad preferences toggled on, feeding my web activity to Instagram.**

Facebook

- Location history toggled on.
- Face recognition set to yes.
- Birthday set to friends (identity theft risk).
- Friends requests can be received from anyone.
- Friend lists are public and mutual friends can be exploited by predators.
- **Ad settings are set to "allowed" for data sharing with "partners"**

- It's time to move from a default posture of exploitation to one of choice.
- **It's time for a digital experience that favors children, by default.**

SOLUTION ONE: CREATE AN INDEPENDENT OVERSIGHT ORGANIZATION

We recommend that **an independent, third-party organization** be established to monitor app ratings and descriptions. This organization would:

- **Establish a ratings framework**, including app ratings, descriptors and interactive elements, similar to the existing ESRB framework.¹⁶
- **Fully assess the top social apps** due to their impact on society.
- **Impose sanctions** for non-compliance similar to what the ESRB does for video games or what the MPAA does for movies.

1

Organization establishes new, ESRB-like ratings framework.

2

Apps self-rate and submit to Apple and Google.

3

Apple and Google review and approve self rating.

4

Inaccurate ratings complaints go directly to the Organization.

5

Organization creates full assessment for top social apps.

6

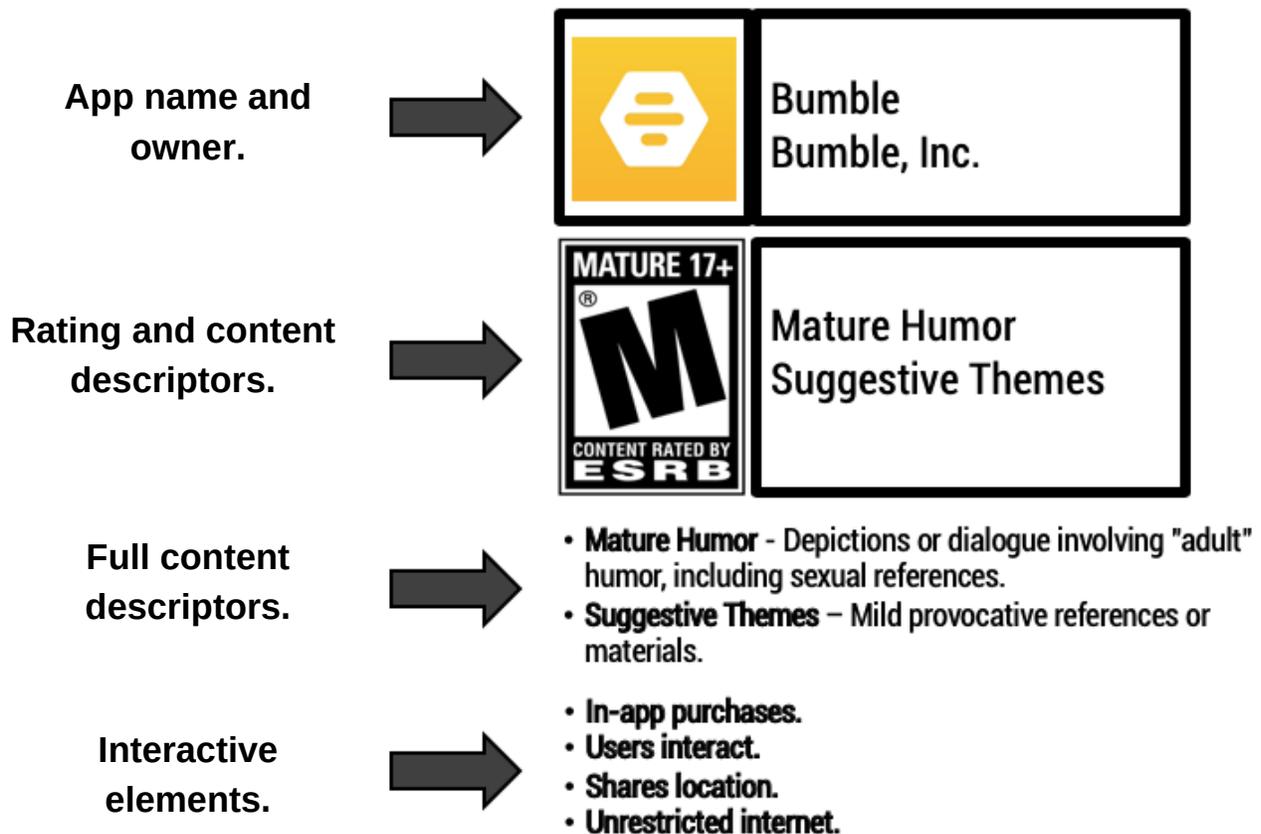
Organization imposes fines for non-compliance.



- ACCOUNTABILITY
- INFORMED PARENTS
- PROTECTED KIDS

SOLUTION ONE: CREATE AN INDEPENDENT OVERSIGHT ORGANIZATION

*A new ESRB-like ratings framework
improves accuracy and transparency.*



*The risk of sanctions and easy reporting of non-compliance
keep app developers, Apple, and Google accountable.*

SOLUTION ONE: CREATE AN INDEPENDENT OVERSIGHT ORGANIZATION

Top social apps would be fully assessed annually by the Organization due to their impact on society.



- **Strong Language** - Explicit and/or frequent use of profanity
- **Strong Sexual Content** - Explicit and/or frequent depictions of sexual behavior, possibly including nudity
- In-game purchases.
- Users interact.
- Shares location.
- Unrestricted internet.

In-app Safety Features	● ● ● ● ●
Privacy and Data Security	● ● ● ● ●
Effective Content Moderation	● ● ● ● ●
Political Neutrality	● ● ● ● ●

Snapchat is a social platform where users send photos and videos to each other that disappear after a designated period of time. Photos and videos can be shared in a Story which lasts for 24 hours. *Due to the disappearing nature of content, the risk of inappropriate behavior in Snapchat is higher than other social apps.* Face filters and other elements can be added to photos. *The Discover news section includes articles with content that can contain strong sexual content, references to drugs, alcohol, and tobacco, mature humor, and use strong language.* "Premium Snapchat" accounts are used by those who sell sexualized content. Snap Map is a location-sharing feature that when opened for the first time, has four settings (default setting shares location with friends). Snapstreaks are a feature that tracks how many days users send and receive Snaps with each other and *has been tied to addictive behavior in teens.*

[The latest compliance report from Snapchat for the year 2019 can be accessed here.](#)

The top social apps would be assigned a rating, descriptors and interactive elements. Additionally, a ratings summary and report card assessing four critical areas would be created:

- In-app safety features
- Privacy and data security
- Effective content moderation
- Political neutrality

SOLUTION ONE: CREATE AN INDEPENDENT OVERSIGHT ORGANIZATION

Based on **actual content and features**, these apps should be rated:



CONTENT

- PG and PG-13 level content.
- Live interactions.
- Access to some content from other social platforms.

FEATURES

- Age verification at sign-up.
- Strong moderation.
- Safety features set by default.



Houseparty



- Profanity allowed.
- Near nudity allowed.
- Mature content including sex toys, drugs, alcohol, weapons, self-harm, violence, and bondage.

- Ability to direct message anyone.
- Minimal age verification at sign-up.
- Modest moderation.
- Content searching (e.g., #hashtags).



- Frequent strong language.
- Significant strong, sexual content including porn, sex toys, bondage, and incest.
- Significant mature content, including weapons and drugs.

- All features from Mature 17+.
- Minimal to no parental controls.
- Political bias.
- Minimal content moderation.

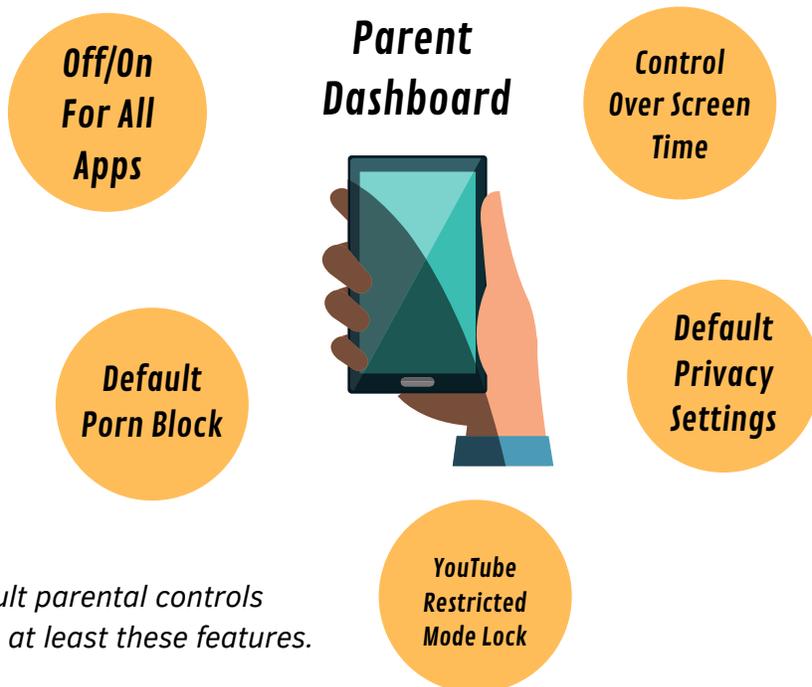


Twitter allows porn and needs an "adult content" label upon download.

SOLUTION TWO: PROVIDE DEFAULT PARENTAL CONTROLS

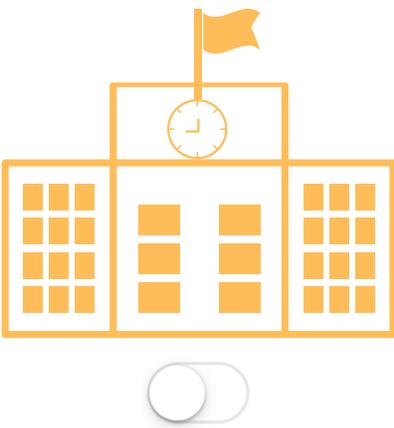
We recommend having **age-based default safety and privacy settings on popular devices and apps.**

Apple's Screen Time parental controls and Google's Family Link **are too complex.** Parents should be able to enter their child's birthday, when the child is in school and bed, **and have basic safety and privacy settings activated in three steps,** not 30.



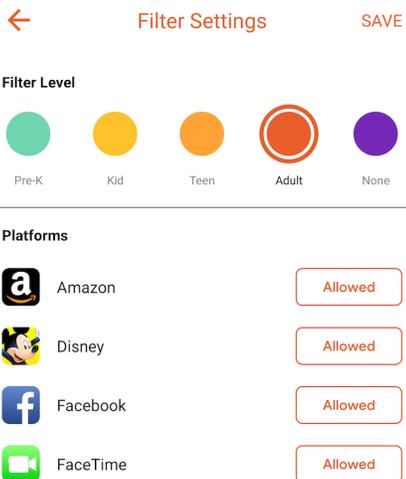
Intuitive, default parental controls should include at least these features.

SOLUTION TWO: PROVIDE DEFAULT PARENTAL CONTROLS



Include toggles to shut off
distracting apps *during*
school and bedtime.

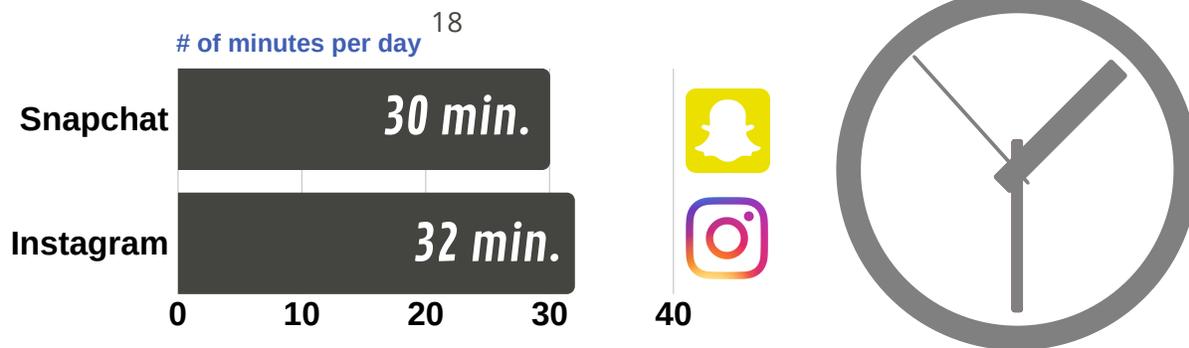
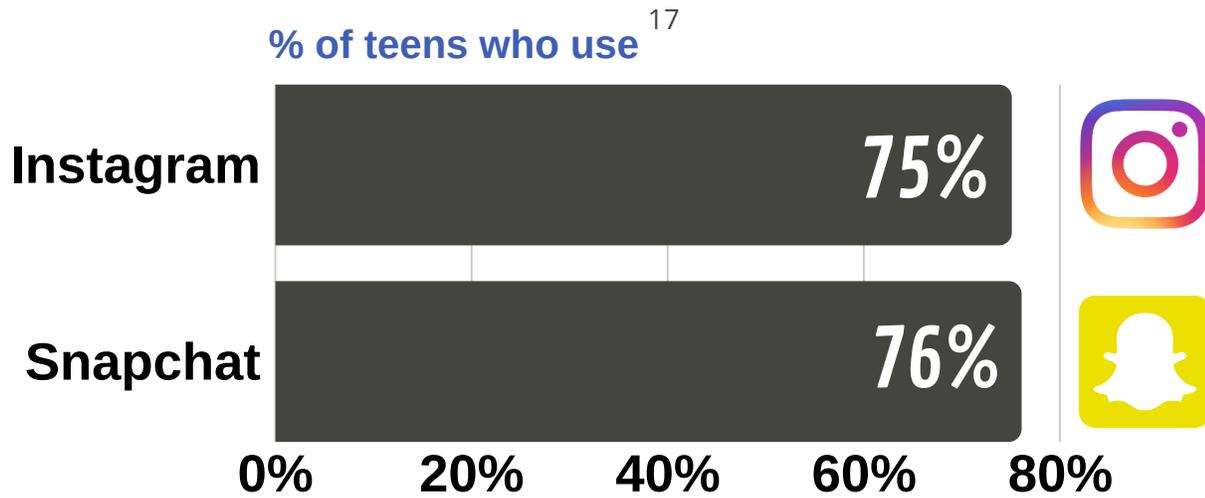
Control
Over Screen
Time



- **Make it simple.**
- **Create age defaults.**
- **Protect more kids.**

This dashboard example comes from Circle with Disney

EVIDENCE: SHOULD THESE APPS BE RATED 12+?



Analysis: Teens are sleeping less. Why? Smartphones

Science Oct 19, 2017 2:12 PM EDT

EVIDENCE: SHOULD THESE APPS BE RATED 12+?



Instagram is leading social media platform for child grooming

By Rob Picheta, CNN

Updated 6:05 AM ET, Fri March 1, 2019

*Instagram's features - comments, hashtags, direct messages - are easily exploited by sexual predators*¹⁹

Instagram's Comments allow pedophiles to keep in touch.²⁰

The screenshot shows a list of Instagram comments. Several comments are circled in red, indicating inappropriate content. A red arrow points from a text annotation to a direct message link in a comment.

Comments circled in red:

- trade976665 Dm dropboxes of little kids being fucked
- mhmhmm69 Dm me to see my younger sisters panties

Comment with red arrow:

ryanwhite8324 Who wants to see my young sister

Here you can see the networking between people, clamoring for images of his sister.

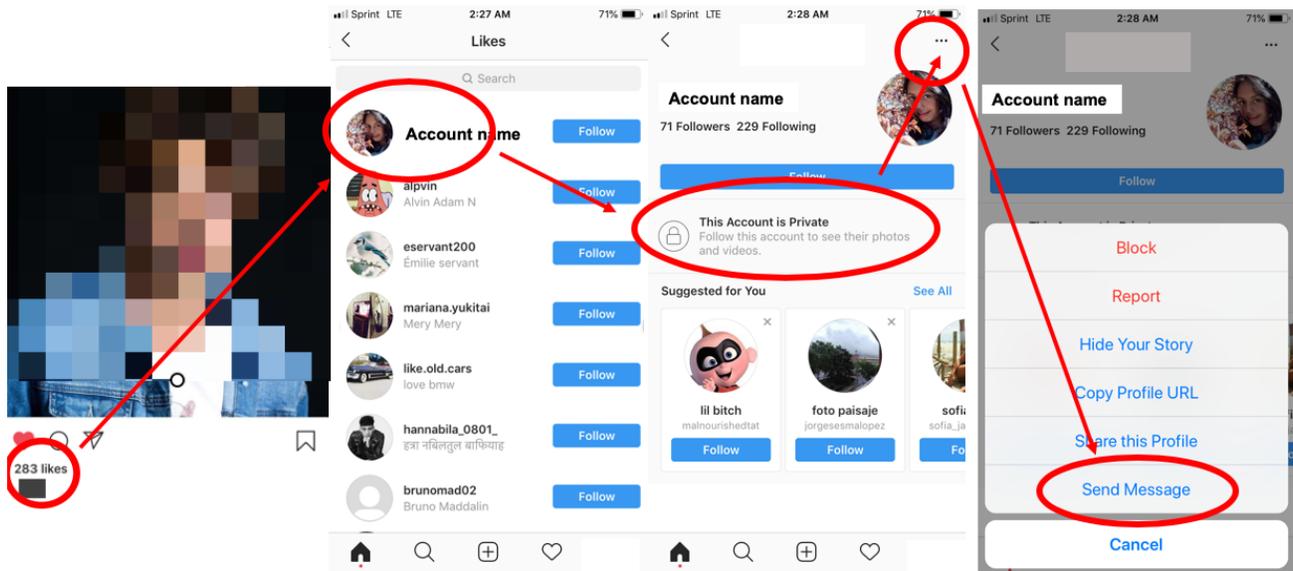
frst.8 @ryanwhite8324 direct you

EVIDENCE: SHOULD THESE APPS BE RATED 12+?

Instagram's #hashtags allow bad content into good places.



Instagram's likes lead predators to unsuspecting kids.



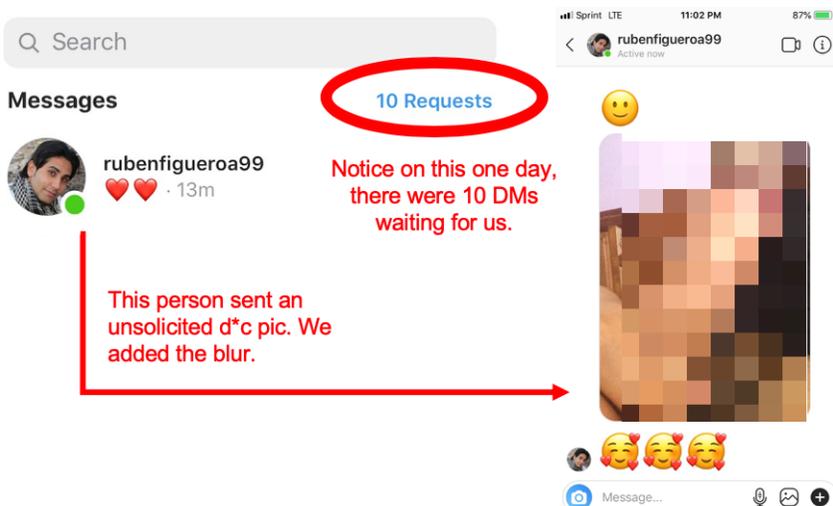
EVIDENCE: SHOULD THESE APPS BE RATED 12+?

Instagram's direct messages allow people with bad intent to contact anyone, even if they have a private account.



This is an actual direct message received by a young Instagram user.

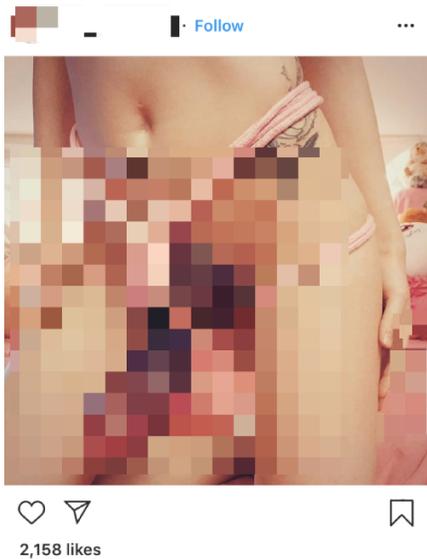
Later in the conversation, this "sex_addict" account sent a video of someone giving him oral sex as a way to coerce the young user to send a picture of her nipple.



These are actual direct messages received by a young Instagram user, even though the user stated she was only 12 years old.

EVIDENCE: SHOULD THESE APPS BE RATED 12+?

These Instagram posts were reported, but were all deemed compliant with Community Guidelines in an app rated age 12+



Instagram allows very lifelike **sex toys** and visuals showing how they're used. Blur added by the Fix App Ratings Team.



Instagram allows **drug use** and tutorial videos.



Instagram only requires a slight black mark **over the center of her nipple** and a little flower over her **crotch**. Blur added by the Fix App Ratings Team.



EVIDENCE: SHOULD THESE APPS BE RATED 12+?

Many non-compliant images are posted every day. It's up to users to report content and wait for Instagram to act.



Bondage and similar mature themes are compliant with current Community Guidelines. Blur added by the Fix App Ratings Team.



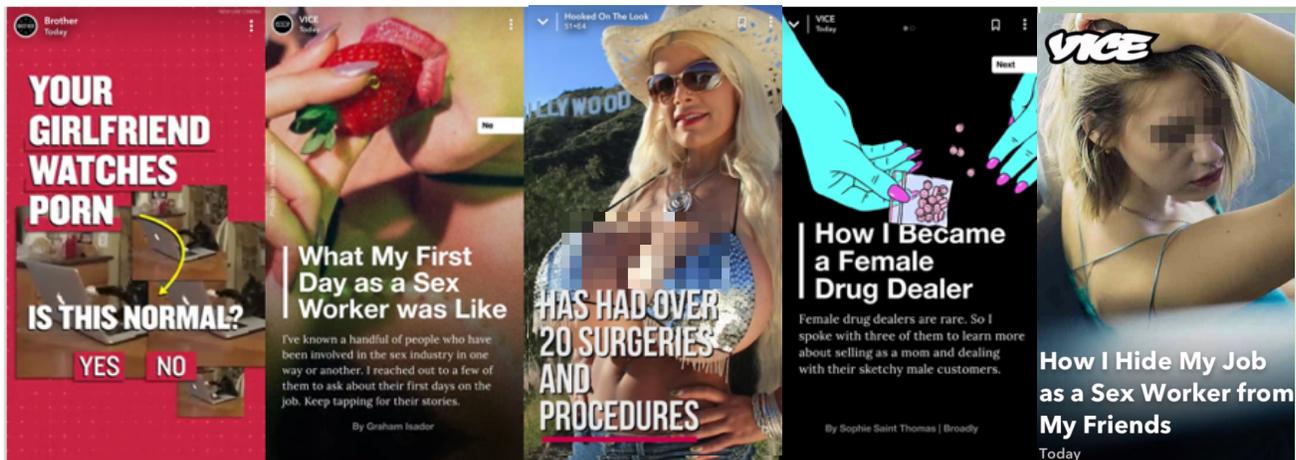
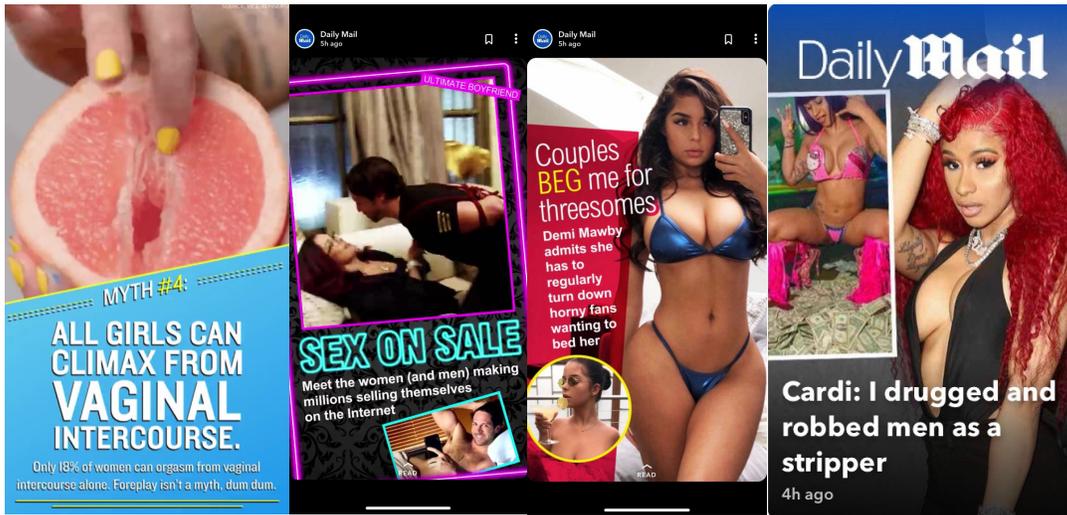
Many non-compliant images like this **video of bestiality** are posted every day. It can be hours (or longer) to be noticed and removed. Blur added by the Fix App Ratings Team.



Not allowed, but remained for an evening until reported.

EVIDENCE: SHOULD THESE APPS BE RATED 12+?

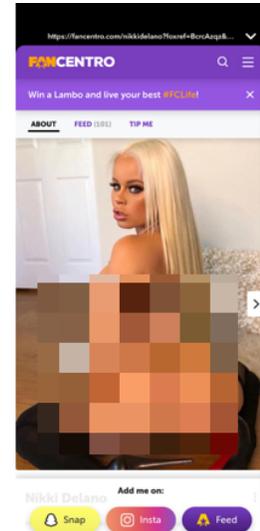
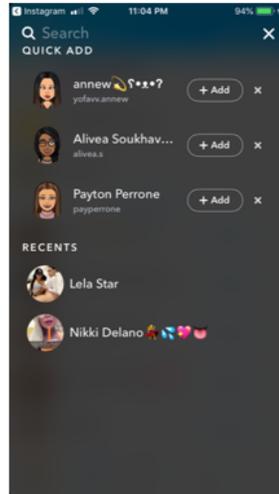
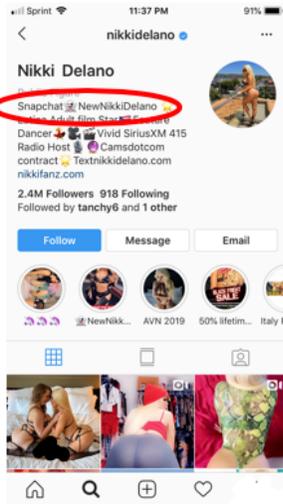
The Discover news section of Snapchat is available to all users. These articles were in the newsfeed of a 13-year-old.



Blur added by the Fix App Ratings Team.

EVIDENCE: SHOULD THESE APPS BE RATED 12+?

Kids can easily access adult content on Snapchat.

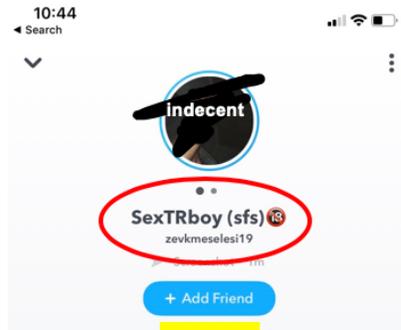
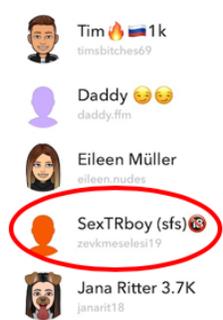


Start in Instagram and click on a Snap username.

"Add" and gain access to her **Snapchat Story**.

Swipe up on the Story to see premium content. Some Stories include **pornography**.

Premium content often includes pornography. Links connect to **Pornhub**, Twitter. Blur added.



"Suggested friends" from Snapchat may also include pornographic accounts. We added one and his Story was **live masturbation**. No Premium (paid) Snapchat account was needed to watch "the show."

For additional evidence visit: [fixappratings.com/evidence](https://www.fixappratings.com/evidence)

#FIXAPPRATINGS

Tech Currently Self-Rates Their Own Apps, Has No Accountability

No one is holding technology companies accountable for the impacts they are having on our young people. Many apps popular with youth are incorrectly self-rated and include dishonest and generic app descriptions that deceive parents. These same apps are frequently used for online grooming, sex trafficking, or contain pornography and sexually exploitative material.

Without accountability, large tech companies will continue to prioritize profits over protecting children. Below are examples of popular apps with misleading and inaccurate ratings. The App Store descriptions are from Apple's App Store, but the same problem is happening on Google Play, the app store for Android.

1 SNAPCHAT (12+)

App Store says: infrequent/mild sexual content and nudity, alcohol, drug use, profanity, and suggestive themes.

Reality: sextortion, pornography, prostitution and sex trafficking; monetized accounts for sex acts, minimal parental controls, Discover news articles frequently push porn, risky sexual behaviors, sexting, drugs and alcohol.

Recommended: 17+



2 INSTAGRAM (12+)

App Store says: infrequent/mild sexual content and nudity, alcohol, drug use, profanity, and suggestive themes.

Reality: sex trafficking and prostitution, self-harm, cyberbullying, pornography, nudity, animal abuse, lack of strong reporting, lack of parental controls, unrestricted web access, no age verification, drugs and alcohol, child abuse and sexual abuse images. **Recommended:** 17+



3 FACEBOOK (12+)

App Store says: infrequent/mild sexual content and nudity, alcohol, drug use, profanity, and suggestive themes.

Reality: fake news, sextortion, nudity, sex trafficking and bullying, child abuse rings, grooming, bullying, minimal parental controls, unrestricted web access through platform.

Recommended: 17+



4 TIKTOK (12+)

App Store says: infrequent/mild sexual content and nudity, alcohol, drug use, profanity, and suggestive themes.

Reality: predators, sextortion, nudity, bullying, lack of reporting, minimal age verification, unrestricted web access.

Recommended: 17+



5 NETFLIX (4+)

App Store says: because it's 4+, no content warnings included.

Reality: poor parental controls, regularly recommends TV-MA, R, and NC-17 content next to child content; originally-produced content depicts graphic sexual violence, normalizing sex trafficking of minors and gratuitous nudity. **Recommended:** 17+



6 EPISODE (12+)

App Store says: infrequent/mild sexual content and nudity, alcohol, drug use, profanity, suggestive, and horror/fear themes.

Reality: alcohol, hook up, group and other risky sex discussed, frequent adult themes, marketed in child gaming apps. **Recommended:** 17+



7 VPN'S (4+)

App Store says: because they're 4+, no content warnings included.

Reality: allows for secret and anonymous web browsing, kids often use on school networks and to hide online behavior from parents, circumvents parental and content controls. **Recommended:** 17+



8 GROUP ME (4+)

App Store says: because it's 4+, no content warnings included.

Reality: categorized as social networking but has a 4+ age rating, unrestricted web access, pornography and child sexual abuse material exchanged on platform. **Recommended:** 17+



9 TWITTER (17+)*

App Store says: infrequent/mild sexual content and nudity.

Reality: rated 4+ by Apple for years, hardcore pornography rampant, prostitution and sex trafficking, child sexual abuse images and discussion, total lack of parental controls, unrestricted web access, no age verification.

Recommended: Adult only



Both Apple and Google have policies that prohibit porn in apps but play favorites by letting Twitter openly allow porn while cracking down on other apps. ^{21,22}

Google Updated its App Development Policy. Kids are still at risk. Here's why.

On May 29, Google told its Android Developers' Community that it was "Building a Safer Google Play for Kids." We believe this response from Google was at least partially due to the Fix App Ratings movement.

New and existing apps must now self-select one of three categories in their Google Play dashboard. **Target audience = children, children and older users, or older users.**

Reminder: Google believes that ages 0-12 are **children** and that ages 13+ are **digital adults**. This is supported by its rules related to creating Gmail accounts and Family Link.

If an app decides that it is targeting **older users**, and *Google agrees*, nothing happens. If Google disagrees, the app can do one of four things, including carry a label or tweak their marketing. **We believe that most major apps, like Snapchat, Facebook, Instagram, TikTok, and YouTube will simply say that they target older users (adults 13+), Google will agree, and nothing will change.**

Here's what won't happen. Apps won't improve their descriptions or change their rating to match their content. Apple and Google won't start using the same rating system (Android only accounts for 17% of teen smartphone users). Ratings won't be assigned independently from those who profit from app success. Smart devices and major apps won't set defaults when the device knows it is being used by a child.

In other words, without an **independent**, third-party organization that establishes a **unified** app ratings framework, we will continue to lack **accountability** in the app ratings process.

Independent. Unified. Accountable. From the beginning, these three words have formed the foundation for the Fix App Ratings movement.

By implementing the two provisions laid out by the Fix App Ratings Team to create an Independent Board and automatically set defaults on major apps and smart devices, **we can start down a path toward increased accountability and protection.** This is not a new path. The ESRB and MPAA show us the way. It's time to hold big tech accountable for their ratings, descriptions, content, and controls. **And the need for an Independent Ratings Board will increase** if recent anti-trust activity creates space for additional app stores to emerge.

This attempt by Google doesn't go far enough. **It's time to #FixAppRatings.**



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“I believe we need a more active role for governments and regulators”

- Mark Zuckerberg, CEO Facebook

“I think it's inevitable that there will be some level of regulation”

- Tim Cook, CEO Apple

The future of the internet and children's safety lies with those who will shape this inevitable regulation. Join us in protecting our children now, and into the future.



#FIXAPPRATINGS

CREATING SAFER DIGITAL
PLACES FOR KIDS

Send inquiries to chrism@protectyoungeyes.com