

GREATER LONDON AUTHORITY

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2298

Title: Lowering the age of membership on Talk London to 16

Executive Summary:

We wish to commission an online safeguarding expert to produce a clear legal and practical view of the implications that lowering the registration age might have in terms of child safeguarding and data protection for usage by young Londoners aged 16+ on Talk London.

Decision:

That the Assistant Director of the City Intelligence Unit approves:

The award of contract to E-Safety Training and Consultancy and expenditure of up to £15,000 from the opinion Research & Statistics (Talk London) budget to:

1. Review the child safeguarding implications of lowering the minimum age to 16 on Talk London;
2. Consider the legal and data protection requirements of lowering the minimum to 16 on Talk London; and
3. Understand best practice approaches and actions that could be taken to make Talk London suitable for use by young Londoners (aged 16+).

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Jeremy Skinner

Position: Interim Assistant Director,
City Intelligence Unit

Signature:



Date: 20.11.18

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. Talk London is City Hall's online community where Londoners can have their say on London's big issues. The Talk London team gather opinions to help steer the policy decisions of the future - on housing, the environment, transport, safety, jobs and more.
- 1.2. We collect personal information from Londoners when they register with the Talk London community. This enables us to create and administer their Talk London account, identify suitable respondents to take part in activities and importantly, to make sure we hear from a broad range of Londoners on all the big issues. We currently welcome all Londoners aged 18 and older to join Talk London.
- 1.3. We wish to consider whether it is possible to lower the current Talk London online community age to 16, in order to engage a wider audience and to ensure that more young Londoners are able to have a say on the issues that affect them now and in the future.
- 1.4. Over 95% of 16 – 24 year olds in the UK own a smartphone and their preferred way to access the internet is through a mobile device. Offering them an opportunity to comment and engage through an online community could be appealing and enable policy makers to gauge key opinions from young people on important subjects.
- 1.5. Web sites and online services have long been required to process data for necessary and lawful purposes only, but since the introduction of the General Data Protection Regulation (GDPR) in May 2018 the focus has rightly increased on how this compliance is achieved – including increased protections for children.
- 1.6. We wish to commission an online safeguarding expert to advise the GLA on, and to help deliver on the objectives set out below.
- 1.7. We invited five agencies to bid for the work via a competitive procurement process, and obtained one quote from E-Safety Training & Consultancy. We have assessed their tender and judged they are experienced and able to complete this project in the time allowed at a competitive price.

2. Objectives and expected outcomes

- 2.1 Our objective is to produce a clear legal and practical view of the implications that lowering the registration age might have in terms of child safeguarding and data protection for usage by young Londoners themselves (aged 16+) and for how Talk London is run by the GLA.
 - To review the child safeguarding implications of lowering the minimum age to 16 on Talk London;
 - To consider the legal and data protection requirements of lowering the minimum to 16 on Talk London; and
 - To understand best practice approaches and actions that could possibly be taken to make Talk London suitable for use by young Londoners (aged 16+) including.

3. Equality comments

- 3.1 The Greater London Authority has an obligation under the Equality Act 2010 and the Public Sector Equality Duty to consider how its policies and decisions affect people who are protected under the act. We are undertaking work to ensure the Talk London community better reflects the London population. Target audiences include young Londoners. Demographic information collected on

registration will ensure we are aware who participates in Talk London and act to promote participation to a broad range of Londoners

4. Other considerations

- 4.1 Risks and issues: Talk London was established to gather Londoners' views to help steer important policy decisions. It is therefore important that we reach and engage Londoners from all walks of life in our work. We need a clear legal and practical view of the implications that lowering the registration age might have in terms of child safeguarding and data protection; both in relation to use by young Londoners (aged 16+) themselves, and for how Talk London is run by the GLA. This will include a full risk assessment, including contributing to a Data Protection Impact Assessment and a data access review; and advising on relevant legislative and regulatory requirements.
- 4.2 Links to Mayoral strategies and priorities: The Mayor has stated that he wants to lead the most engaged, transparent administration seen at City Hall. The Talk London community ensures we allow Londoners to participate in the design, development and delivery of strategies, policies, interventions and services.
- 4.3 Impact assessments and consultations: The appropriate procurement processes were followed to ensure that the successful company complies with the GLA's equal opportunities requirements.

5. Financial comments

- 5.1 The expenditure of up to £15,000 will be funded from the 2018-19 Talk London Programme budget within the Intelligence Unit.

6. Planned delivery approach and next steps

Activity	Timeline
Project kick off	Mid Nov '18
Review of policies, processes and site; focus groups with young people	December '18
Interim Report	End Jan '19
Mapping best practice and privacy policy	February '19
Risk assessment; data protection impact assessment	March '19
Final report with full recommendations	End March '19

Appendices and supporting papers:

None.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

If YES, for what reason:

Until what date: (a date is required if deferring)

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Christine Wingfield has drafted this report in accordance with GLA procedures and confirms the following:

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 19 November 2018.

ASSISTANT DIRECTOR OF FINANCE AND GOVERNANCE:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature



Date

20-11-18