

5Rights' submission: DCMS review of online advertising

April 2020

About 5Rights Foundation

The digital world was never imagined as an environment in which childhood would take place. It was invented by adults, for adults and designed with the idea that all users are equal. But if all users are treated equally, then children and young people are treated as adult.

5Rights Foundation exists to make systemic changes to the digital world to ensure it caters for children and young people, by design and default. We advocate for enforceable regulation and international agreements that allow children and young people to thrive online. We develop technical standards and protocols to help businesses redesign their digital services with children and young people in mind. We publish and lead across our four priority areas: Design of Service, Child Online Protection, Children and Young People's Rights, and Data Literacy.

Overview

The 5Rights Foundation welcomes the Department's call for evidence on online advertising, and particularly its recognition of the need to supplement the findings of other reviews that relate to online advertising.

Children and young people were not explicitly mentioned in the scope of the Competition and Market Authority's (CMA) market study, they are largely absent from the Information Commissioner's June 2019 update report into adtech and real time bidding, and while the Centre for Data Ethics and Innovation's (CDEI) review of online targeting acknowledged the need to consider 'vulnerable people', including children, its qualitative and quantitative research only engaged with individuals over the age 16. As a result, the specific needs and vulnerabilities of children and young people are largely absent.

Our submission focuses on children and young people's interaction with digital advertising specifically, a subject on which we have considerable experience and expertise.

In this context, we are chiefly concerned that:

- 1. Children are disproportionately susceptible to the *pressures* of online advertising, targeted or otherwise, due to their age and developmental capabilities.¹**

¹ [Study on the impact of marketing through social media, online games and mobile applications on children's behaviour](#), European Commission, March 2016

2. The increasingly embedded and immersive nature of online advertising means that children are often unable to *recognise* content that is paid-for.²
3. Online behavioural advertising is increasingly *manipulative* in nature, including through the opaque use of children's data, and therefore undermines the protections we routinely offer children.
4. Children and young people are exposed to *age-inappropriate adverts*³ due to insufficient age assurance measures.
5. Children do *not understand how data about them are used* to target them with commercial content.⁴

We note that the Age Appropriate Design Code⁵ contains a number of important protections for children and young people that are relevant to digital advertising. These include the following requirements of online services likely to be accessed by children under 18 as set out in the Information Commissioners' final draft submitted to DCMS in January 2020:

- Always provide a privacy setting for behavioural advertising and ensure that this setting is 'off' by default for children.
- Do not profile children or automatically recommend content to them unless there are appropriate measures in place to protect them from any harmful effects.
- Complete a Child Data Protection Impact Assessment if you anticipate processing a child's data.
- Ensure that the information you provide to children about privacy and your community standards are concise, prominent, and in clear language suited to the age of the child. Provide additional specific 'bite-sized' explanations about how you use personal data at the point that use is activated.
- In order to comply with these requirements, endeavour to establish to an appropriate degree of certainty which users are children.

The enforcement of these requirements would greatly improve children and young people's experience of digital advertising. This requires the Secretary of State to lay the Code before Parliament at the first opportunity, after the statutory 'standstill' period with Europe is over, so that the 12-month transition period can begin and the Code can take effect, without any further delay. **We recommend that the Government lays the Code in Parliament immediately, and supports the Information Commissioner and relevant service providers in enforcing and complying with the Code.**

² [Children and parents: Media use and attitudes report](#), Ofcom, February 2020

³ [Children 'interested in' gambling and alcohol, according to Facebook](#), Guardian, 9 October 2019

⁴ [Children's data and privacy online: Growing up in a digital age](#), M. Stoilova, S. Livingstone, R. Nandagiri, London School of Economics and Political Science, 2019

⁵ [Age Appropriate Design: a code of practice for online services](#), ICO, January 2020

Consultation response

Our response focuses on questions one and two (challenges/harms of online advertising), question four (compliance with the current regulatory system), question nine (growth and innovation of online advertising), and question ten (the role of the Government).

Challenges of online advertising to children and young people

We summarise the evidence on the challenges and harm that children and young people face in relation to digital advertising and targeting below.

1. Children are disproportionately susceptible to the pressures of online advertising

While advertising and marketing practices influence us all (that is what they are designed to do) children and young people are likely to be more affected by, and vulnerable to, the pressures of advertising and the ways in which it can shape or change their behaviour.

This explained, in part, by research literature on both ‘Personal Persuasion Knowledge’ and ‘Limited Capacity for Attention’. Persuasion knowledge is defined as the capacity to recognise that a message is seeking to persuade and then to activate ‘cognitive defences’ against this persuasion. A report by the European Commission on the impact of digital marketing on children’s behaviour summarised the literature as demonstrating that the persuasion knowledge of children under the age of 12 is not fully developed, meaning they “experience difficulty in recognizing and evaluating advertising information”.⁶ After the age of 12...

For children of all ages, however, persuasion knowledge can be ‘neutralised’ by other factors that compete for children’s ‘limited capacity for attention’, particularly in the digital environment:

“Social media, online games and mobile applications are interactive and it is reasonable to assume that their potential for affective involvement of children is higher than traditional TV advertising. Playing a game was found by Janseen et al. (2010) to take a considerable amount of cognitive resource and, as a child’s information processing capabilities are limited, attention to factors outside the game could be attenuated. Cognitive load and the affective stimuli in advertisements increased the difficulty of recognising and defending oneself against the persuasive message.”⁷

⁶ [Study on the impact of marketing through social media, online games and mobile applications on children’s behaviour](#), European Commission, March 2016

⁷ Ibid.

Strikingly, the report of the European Commission notes that for advergames – adverts disguised as or embedded within online games – the activation of persuasion knowledge did not affect the influence of the message: *“even if children were aware of the commercial intent of the game, this did not necessarily reduce their attraction towards the brand or their intention to purchase its products.”*⁸ This is supported by a World Health Organisation (WHO) study from 2016, which reported that *‘even when older children recognize advertising content, they are still susceptible to its persuasive effect’*. On the question of food advertising specifically, WHO concludes:

*“suggestions that ‘advertising literacy’ increases the resistance of older children to food advertising are not supported. Policy and industry self-regulation – focused on protecting young children from television advertising that is consciously, cognitively processed – have been ‘eclipsed’ by technological and commercial innovation in digital marketing, by recent understanding of the effects of emotional and unconsciously processed advertising and by growing insight into the susceptibility of adolescents.”*⁹

This has clear implications for the need to strengthen the ASA’s guidance on online marketing to under 12s, which currently states that children must understand the marketer and commercial intent behind the marketing. The evidence suggests that measures to ensure such understanding are insufficient, given that children remain susceptible to advertising even after they identify it.¹⁰

2. The immersive and embedded placement of online advertising means that children struggle to recognise it is paid-for

The immersive and embedded nature of advertising in the digital environment presents further, unique challenges to children’s ability to recognise and respond to promotional content.

Research by the Advertising Standards Agency (ASA) states that *‘evidence suggests that under-12s struggle to identify more embedded or immersive types of online ads’*¹¹, while research by Ofcom, suggests that children of a wider age-range may also struggle to identify this form of advertising. Ofcom’s most recent children’s media literacy research (2020) found that only 23% of 8-11-year-olds and 32% of 12-15s recognised that advertising on Google search results was paid-for – a statistic which hasn’t changed since 2015.¹² Most

⁸ Ibid.

⁹ [Tackling food marketing to children in a digital world: trans-disciplinary perspectives](#), WHO, 2016

¹⁰ Children are defined as those under 16 in the CAP Code, but protections are not as robust as they are in the guidance for online marketing to children under 12. See [Recognition of advertising: online marketing to children under 12](#), Advertising Standards Authority, 28 April 2017

¹¹ [Recognition of advertising: online marketing to children under 12](#), Advertising Standards Authority, 28 April 2017

¹² [Children and parents: Media use and attitudes report](#), Ofcom, February 2020

children simply thought they were the *best or most popular ads*. The way that Google now indicates paid-for content is even *less clear*,¹³ with organic search results formatted to resemble ads. Media commentators have called it “*user-hostile*”¹⁴ and “*a purposeful dark pattern*”¹⁵, and these changes have increased the number of people clicking ads from 4.5% to 10%,¹⁶ affecting millions of children and other users all over the world. This is despite the change being presented by Google as a transparency upgrade.

Again, the rise of ‘advergAMES’ provides a good illustration of the challenges children face in recognising more personalised and embedded advertising or promotional content. The Institute for Policy Research at the University of Bath found that ‘*children as old as 15 do not recognise advergAMES as adverts, and are influenced by them without their conscious use*’. According to the report:

‘Findings consistent across many high-quality studies (published in top, double-blind peer reviewed international journals), show that children do not understand that they have been exposed to advertising, and often do not even recall seeing the brand placed in the game, but yet their opinions and behaviour are affected.’¹⁷

One recent study into the habits of more than 1,000 children discovered that those who played an online game featuring subtle promotion of food subsequently ate more than 50% more sweets than children who had played the game without the embedded ads.¹⁸ Indeed, ‘advergAMES’ have been particularly associated with the promotion of high sugar, salt and fat foods. The most (in)famous example of this in action is the partnership between Pokémon Go-maker Niantic and McDonalds, which saw the game sending unsuspecting players to fast-food restaurants by placing a higher-concentration of Pokémon at their sites.¹⁹

3. Online behavioural advertising is increasingly manipulative

Given that many of the online services children use are funded in large part by targeted advertising, the commercial incentive to collect as much data as possible has significant implications for the design of such services and their impact on children. As researchers at the LSE have noted, the ‘*increasing commercial collection and exploitation of children’s*

¹³ See [5Rights’ reactions to Ofcom’s ‘Making Sense of Media’ research](#), 5Rights Foundation, February 2020

¹⁴ [Google’s latest user-hostile design change makes ads and search results look identical](#), TechCrunch, January 2020

¹⁵ [Google’s ads just look like search results now](#), The Verge, January 2020

¹⁶ [Google’s latest search results change further blurs what’s an ad](#), Digiday, 23 January 2020

¹⁷ [AdvergAMES: it’s not child’s play](#), Institute for Policy Research, University of Bath, 2014

¹⁸ Children’s reactivity to embedded food cues in advergAMES, Frans Folkvord, Behavioural Science Institute, Radboud University, 2016

¹⁹ [Pokemon GO reveals sponsors like McDonald’s pay it up to \\$0.50 per visitor](#), TechCrunch, 31 May 2017

*data... [has] potential consequences inimical to children's selfhood and agency, and their rights to privacy.'*²⁰

As tech expert and journalist John Naughton writes in the New Statesman: *"While social media users are essential for surveillance capitalism, they are not its paying customers: that role is reserved for advertisers. So the relationship of platform to its user is essentially manipulative: he or she has to be encouraged to produce as much behavioural surplus as possible."*²¹

The targeting of advertising based on emotions is one clear example of where the best interests of children have become a secondary consideration to the commercial imperative to extract data. In a now infamous leaked memo from Australia, Facebook was found to have given a presentation to advertisers in which it demonstrated its capability to infer the real-time emotions of adolescents and advertise to them based on those feelings. Segment profiles included *"insecure", "worthless", "stressed", "defeated", "overwhelmed", "anxious", "nervous", "stupid", "silly", "useless", and a "failure"*.²²

Many mood, meditation, and mental health apps also have business models that are based on selling young people's emotional data, so they can be targeted with advertising based on the likelihood that they're feeling a certain way at a given point in time.²³ Privacy International analysed 136 popular mental health websites, finding that 75% contained embedded marketing trackers. The UK mental health websites that were analysed each had an average of 12 tracking cookies revealing when the visitor is low or anxious, and which shared sensitive mental health data to advertising companies.²⁴

Such emotional targeting is on the rise. Amazon recently patented technology that would allow its connected devices to monitor users' emotions, and respond with 'highly targeted audio content, such as audio advertisements or promotions', while Spotify has started to associate playlists with different moods and events, selling ad space to companies based on the association.²⁵

The exploitation of children's mood, emotional state, or mental health for the purposes of advertising is a clear breach of ethics, not least given that children and young people are likely to be unaware that they are being targeted in this way. This practice is part of a wider

²⁰ [Regulating children's data and privacy online: the implications of the evidence for age-appropriate design](#), LSE, November 2018

²¹ [Slouching towards dystopia: the rise of surveillance capitalism and the death of privacy](#), New Statesman, 26 February 2020

²² [Facebook told advertisers it can identify teens feeling 'insecure' and 'worthless'](#), The Guardian, May 2017

²³ [The mood apps profiting from your mental illness](#), New Statesman, December 2018

²⁴ [Your mental health for sale](#), Privacy International, September 2019

²⁵ [Alexa wants to know how you're feeling today](#), The Atlantic, October 2018

culture, however, in which children and young people's data – irrespective of its sensitivity – is seen as 'fair game' for the targeting of commercial advertising and marketing.

4. Children are exposed to adverts for inappropriate content online

In 2018, Diageo paused its advertising on Snapchat, after the ASA questioned the efficacy of Snap's efforts to establish the age of its users.²⁶ In April 2019, the ASA found adverts for high fat, sugar or salt food appeared alongside videos on YouTube channels directed at children,²⁷ as well as gambling ads being served to child avatars on children's websites.²⁸ In September 2019, Amazon's 'frequently bought together' feature was reported to have suggested that a 14-year-old buy knife with his school rucksack.²⁹ A joint investigation by the Danish Broadcasting Corporation and the Guardian in October of the same year found that Facebook's algorithm had tagged thousands of under 18s as 'interested in' gambling and/or alcohol, exposing 1.68 million young people to harmful targeted adverts.³⁰ This is despite Facebook's community guidelines stating that they don't allow ads that promote the sale of alcohol or gambling to minors.

The utility of these policies/community guidelines is significantly undermined by the weak 'self-declaration of age' mechanisms employed by most online platforms. As early as 2013, the ASA found that 83% of children lied about their age when using social media, and figures remain high today.³¹ NSPCC has criticised social media and gaming platforms, saying: *"asking users to provide an unverifiable date of birth will do nothing in practice to protect children from harmful or age-inappropriate content."*³²

The ASA has also repeatedly questioned the "adequacy of self-reported age as the sole means of targeting", and called on social media companies to take a "tougher line" than using easy to bypass self-declaration systems.³³ Yet since the ASA urged companies to implement more robust age verification in 2013, companies continue to fail to uphold their own age restrictions on their platforms.

5. Children don't understand how their data are used in the online advertising system

In evidence to the House of Lords Communications Committee inquiry on advertising in the digital age, marketing executives variously stated that the industry is *'murky at best, fraudulent at worst', 'not fair and open', a 'fragmented landscape which is enormously complicated', has a 'lack of transparency... and a historical poor level of standards around*

²⁶ [After ad watchdog slap, Diageo pulls advertising from Snapchat](#), Digiday, 3 January 2018

²⁷ [Brands found targeting junk food ads at children online](#), Marketing Week, 6 June 2019

²⁸ [Harnessing new technology to tackle irresponsible gambling ads targeted at children](#), ASA, 4 April 2019

²⁹ [Amazon's 'frequently bought together' feature suggests 14-year-old buys knife with his school rucksack](#), Telegraph, September 2019

³⁰ [Children 'interested in' gambling and alcohol, according to Facebook](#), Guardian, 9 October 2019

³¹ 51% of 12-year-olds. See [Children and parents: Media and attitudes report 2018](#), Ofcom, January 2019

³² [Instagram demands date of birth from new members](#), BBC News, 4 December 2019

³³ [More than 80% of children lie about their age to use sites like Facebook](#), Guardian, 26 July 2013

responsibility, and that *'many in the sector cannot themselves fully understand what is happening around them'*.³⁴ The ICO has also said that the *'data supply chain is opaque'*³⁵ and research consistently finds that *'consumers do not know how their personal data is collected, used and shared by other parties.'*³⁶ In fact, a Harvard Business School study from 2018 concluded that companies have a financial incentive to ensure that users aren't aware of how they are tracked online. The study found that the effectiveness of advertising declined, and consumer behaviour changed (i.e. consumers were reluctant to engage with ads) when websites were transparent about how they shared their data with third parties, and how inferences had been made about them.³⁷

For children specifically, research has shown that younger children (under 12s) are often unaware that advertising is based on their data at all.³⁸ As Unicef note, *'Many data collection practices occur...under circumstances that do not empower them to understand and control the use of their personal information.'*³⁹ Platforms do not adequately explain to children what is happening when they visit a site, or where, to whom, and in what form their data are sold/shared. The terms and conditions of the most popular children's websites require a university level education to understand.⁴⁰

Research by the London School of Economics also found that children often struggle to describe how they are tracked online, fail to grasp the commercial aspect and value of their data, and what it means for their personal privacy.⁴¹ This has been observed in 5Rights' workshops with children and young people, too, where many felt that targeted advertisements are helpful and convenient, but were unaware of the scale and spread of their data. Once they began to understand this, some participants commented that they were *'shocked that companies know so much about you'* and found it *'creepy'*.⁴²

Compliance with the current regulatory system

A number of recent inquiries and investigations have suggested that the industry's level of compliance with advertising regulation is poor.

³⁴ [UK advertising in a digital age](#), Select Committee on Communications, April 2018

³⁵ [Update report into adtech and real-time bidding](#), Information Commissioner's Office, June 2019

³⁶ [Privacy International's response to the CMA's online platforms and digital advertising market study](#), Privacy International, July 2019

³⁷ [Why am I seeing this ad? The effect of ad transparency on ad effectiveness](#), T. Kim, K. Barasz, L. John, Harvard Business School, 2018

³⁸ [Towards a better digital future](#), Revealing Reality, 2019

³⁹ [Children and digital marketing: Rights, risks and responsibilities](#), Unicef, April 2018

⁴⁰ [Social site terms tougher than Dickens](#), BBC News, July 2018; [We read 150 privacy policies. They were an incomprehensible disaster](#), New York Times, June 2019

⁴¹ [Children's data and privacy online: Growing up in a digital age](#), M. Stoilova, S. Livingstone, R. Nandagiri, London School of Economics and Political Science, 2019

⁴² *Comments from young people aged 11-17 who took part in 5Rights' Data Literacy programme, January – June 2019.*

- In 2017, the **House of Lords' Communication Committee** cautioned that *'advertising agencies have been quick to sell digital advertising services to their clients but we are concerned that in doing so they have created a new threat for their industry: digital advertising often bombards users and does not comply with established standards.'*⁴³
- In 2019, the UK **Information Commissioners Office's** report into the adtech industry said; *'overall, in the ICO's view the adtech industry appears immature in its understanding of data protection requirements... we have general, systemic concerns around the level of compliance of RTB [real time bidding].'*⁴⁴
- In 2020, the **Centre for Data Ethics and Innovation**, in their final report on online targeting says: *'current mechanisms to hold [companies] to account are inadequate. We have reviewed the powers of the existing regulators and conclude that enforcement of existing legislation and self-regulation cannot be relied on to meet public expectations of greater accountability.'* It adds: *'the operation and impact of online targeting systems are opaque... this prevents the level of scrutiny required to robustly assess the impact of targeting systems on individuals and society.'*⁴⁵
- **Data protection authorities in Europe** have been critical of the GDPR's 'One Stop Shop' agreement, and specifically Ireland's Data Protection Commission for failing to have issued sanctions against tech companies.⁴⁶ A German authority said *"after nearly one and a half years we must concede that we have a huge problem with the enforcement of cross border processing especially by globally acting companies. It is absolutely unsatisfactory to see that the biggest alleged data protection violations of the last 15 months with millions of individuals [concerned] are far away from being sanctioned."*
- In 2019, the **Competition and Markets Authority** interim report explores measures to make companies with strategic market status "demonstrate compliance" through an enforceable code of conduct, noting that "consumers sometimes have inadequate control over the data that is provided to online platforms."⁴⁷

In addition, 5Rights notes that:

- Children have the right to be protected from economic exploitation under Article 32 of the UN Convention on the Rights of the Child (UNCRC).
- The current business model of the sector is dependent on targeted advertising and, as such, companies are incentivised to serve children adverts regardless of their

⁴³ [UK advertising in a digital age](#), Select Committee on Communications, 11 April 2018

⁴⁴ [Update report into adtech and real time bidding](#), Information Commissioner's Office, 20 June 2019

⁴⁵ [Review of online targeting: Final report and recommendations](#), Centre for Data Ethics and Innovation, February 2020

⁴⁶ [German regulator says Irish data protection commission is being 'overwhelmed'](#), Irish Times, 3 February 2020

⁴⁷ Online platforms and digital advertising: Market study interim report, Competition and Markets Autho

appropriateness, obscuring paid-for content within or alongside ‘organic’ content, and exploiting children’s data to increase the effectiveness of ads.⁴⁸

- The advertising regime is largely self-regulatory and the data protection regime is currently poorly enforced.⁴⁹ Last year, the ASA said it would like companies to be ‘more open’ about their systems for handling and monitoring irresponsible and inappropriate ads, which was ‘not as transparent as [they] would like’. Instead, the ASA are using child avatars and AI to find and ban ads, which it claims is a ‘more proactive approach than relying on complaints to come in.’⁵⁰ It is notable that the ASA has been criticised in the past for failing to focus enough of its attention on digital marketing, leaving children exposed to harmful online food marketing in particular.⁵¹
- Some of the top global digital advertisers (by spend), including Procter and Gamble, L’Oreal, Unilever and Nestle, feel that current regulation is insufficient, and have taken their own action, demanding stronger digital standards for addressing brand safety and transparency.⁵²

This overall picture indicates to us that advertising regulation – largely ‘self-regulation – is currently both ineffective and insufficiently enforced.

Ensuring the growth and innovation of the online advertising sector

In 5Rights’ 2019 report *Towards an Internet Safety Strategy*, we cautioned Government not to pit innovation against safety, recognising instead a myriad opportunities for businesses to innovate and grow *in accordance* with children’s interests:

“It is crucial that the Internet Safety Strategy does not characterise online safety and innovation as two mutually exclusive concepts that must be balanced, but rather harness the understanding that safety, rights and ethics – by design and default – reinforces innovation and investment. Introducing ethical standards would necessitate different business models and different values to emerge to create a more diverse, and therefore more competitive, sector.”⁵³

In relation to advertising specifically, the Information Commissioner echoed these sentiments in her 2019 report on adtech and real time bidding: *“The rules that protect people’s personal data must be followed. Companies do not need to choose between innovation and privacy.”*

⁴⁸ See [5Rights’ reactions to Ofcom’s Making Sense of Media research](#), 5Rights Foundation, February 2020

⁴⁹ See [‘We have a huge problem’: European regulatory despairs over lack of enforcement](#), Politico, December 2019

⁵⁰ [Social media platforms not as transparent as we would like, says ad regulator](#), E and T, 20 May 2019

⁵¹ [ASA condemned for failing to protect children online from food company marketing](#), The Drum, April 2013

⁵² [Unilever, Nestle, Diageo, others join new council to ‘clean up’ digital marketing](#), Marketing Dive, 4 October 2018

⁵³ [Towards an Internet Safety Strategy](#), 5Rights Foundation, January 2019

In its interim report on online platforms and digital advertising, the Competition and Market's Authority highlighted how Facebook and Google, the duopoly dominating the advertising system, *reduces competition and reduces innovation*.

*"We are concerned that [Facebook and Google] are both no so large and have such extensive access to data that potential rivals can no longer compete on equal terms. These issues matter to consumers. If competition in search and social media is not working well, this can lead to reduced innovation and choice in the future and to consumers giving up more data than they feel comfortable with. Weak competition in digital advertising can increase the prices of goods and services across the economy and undermine the ability of newspapers and others to produce valuable content, to the detriment of broader society."*⁵⁴

The Australian Competition and Consumer Commission (ACCC) articulated the same point, noting in the final report from its digital platforms inquiry that, *"The ACCC has concerns about the potential for the misuse of market power within advertising and other markets, and about the potential for other market inefficiencies to be caused by a lack of transparency."*⁵⁵ The ACCC has now launched a separate inquiry into digital advertising specifically.

We would push back strongly, therefore, against any suggestion that innovation in digital advertising might be hampered by the enforcement of existing data protection requirements or the protection of children and young people's rights. These are simply the price of doing business.

The role of the Government

As outlined above, we urge government to consider the needs of children at every point when developing policy. They are one in three users online globally, and their experience online is central to their childhood development, safety and flourishing.

Children and young people's experience of online advertising would be greatly improved by the proper enforcement of the Age Appropriate Design Code therefore;

We call on the Government to lay the Code in Parliament without delay, to support the digital and advertising sectors in bringing their practices in line with the Code during the 12-month transition period, and to ensure that the ICO is supported and resourced to enforce the Code once it takes effect.

⁵⁴ [Online platforms and digital advertising: Market study interim report](#), Competition and Markets Authority, December 2019

⁵⁵ [Digital Platforms Inquiry](#), Final Report, ACCC, June 2019

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