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Youths' Access to Public Space: An Application of Bernard's *Cycle of Juvenile Justice*

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Since the late 1800s youth have been controlled in various ways. As argued in this paper, one of the ways policymakers have used to control youth throughout has been through controlling youth's access to public spaces. When youth do not have access to public space, adult society is able to breathe a collective sigh of relief hoping that youth cannot commit crimes while out of sight. In this article, I will argue that policymakers have limited youth access to public space in a cyclical fashion. I will demonstrate this argument by discussing the issues of juvenile curfew, juvenile use of public parks, and juvenile use of social media to replace public space.

According to Thomas Bernard (2010) since the 1800s the juvenile justice system has operated in a cyclical fashion. The cycle of juvenile justice occurs in four steps. First, the general public and juvenile justice officials believe that juvenile crime is at an all-time high, there are too many harsh punishments, and there are not enough lenient punishment options (Bernard and Kurlychek 2010). Juvenile justice officials begin to believe that the harsh punishments will lead to more crime and that the lack of lenient punishments leads to minor offenders being "let off scot-free" (Bernard and Kurlychek 2010:3). Since there is a "forced choice" between harshly punishing juveniles and letting juveniles get away with their crimes, juvenile justice officials and the general public see doing nothing as part of the problem (Bernard and Kurlychek 2010:3). Next, "a major reform introduces lenient treatment for juvenile offenders. This creates a middle ground between harshly punishing and doing nothing at all" (Bernard and Kurlychek 2010:4). Finally, juvenile crime is seen as being rather high again. This leads to harsh punishments being expanded and lenient punishments being contracted (Bernard and Kurlychek 2010:4). Bernard and Kurlychek (2010) argue that this cycle has been repeated several times during the history of the United States including the formation of Houses of Refuge, the formation of the juvenile justice system, and the current 'get tough' movement. The 'get tough' movement has been characterized as a shift away from treating offenders (both youthful and adult) as individuals in need of services and rehabilitation to a more widely accepted belief that offenders are deserving of punishment and that punishments should be meted out severely and swiftly (Tonry 2004). Essentially, the widely popular crime control rhetoric of punishing individuals for their wrong doing as quickly and efficiently as possible is applied to youthful offenders.

The following section describes the social construction of youth, adolescence, and delinquency over time. In addition, this section describes the concept of limiting access to public space, for both youth and adults, within the wider context of inequality. In each of the subsequent sections – juvenile curfew, juvenile limitation of access to public parks, and social network sites as a new type of public space – I will describe how the assumptions of the cycle of justice are satisfied. Finally, I conclude with policy recommendations towards equitable access to public space for youth.

The Social Construction of Childhood

Starting in the late 1800s, the social conceptions of youth, childhood, and delinquency changed from youth as autonomous beings to youth as dependents in need of protection

(Sutton 1988). As these conceptions changed so did youths' access to public space. Additionally, access to public space has been limited for both youth and adults to perpetuate inequality within the United States.

Childhood has not always been recognized as a distinct period in one's life. According to Muncie (2004:53), "Aries' radical notion was that prior to the seventeenth century there was no conception of childhood, adolescence or youth." Children in pre-industrialized societies were treated as small adults who could work, drink, gamble, or other activities commonly associated with adulthood today. When conceived of as small adults, children were not subject to laws based on their age or lack of maturity (Muncie 2004).

The concept of childhood as a distinct developmental period did not begin to emerge until the Middle Ages. At this time, children began to be seen as "innocents and as objects of affection, especially within the family" (Muncie 2004:53). However, children were also seen as capable of evil. These two conceptions lead to children being viewed by society as in need of protection *and* in need of discipline (Muncie 2004). Primarily the family was charged with both tasks of protection and discipline. It was the family's fault if the child did not perform up to the desired expectations of being "dependent, submissive to authority, obedient, modest, hard-working, and chaste" (Muncie 2004:54). These early conceptions of childhood only applied to upper class children who had the luxury of not working. Working class children often had to provide economic support to their family causing them to mature faster than upper class children (Muncie 2004).

With industrialization, the construction of childhood as a distinct time during a person's life began to include all children, not just upper class children. By including all children in this construction, it was possible to start viewing children as unsuitable for factory work (Muncie 2004). Of course, not allowing children to work resulted in dire consequences for working class families. Adults in these families had to find new ways to support themselves economically. In addition, since parents had to work longer hours away from home, children were more likely to be unsupervised and neglected (Muncie 2004). Thus the social construction of children changed from worker to delinquent (Muncie 2004).

Controlling Youth with the Creation of the Juvenile Justice System

In response to the growing juvenile delinquent problem, the first incarnation of the juvenile justice system occurred in the 1820s with the formation of the Houses of Refuge. The House of Refuge, as the first juvenile institution was known, addressed the problem of delinquency by removing children from their homes and using a highly controlled education program to teach the children morals and values (Bernard and Kurlychek 2010). The methods that the House of Refuge used assume that children are delinquent because their parents lack morals and values. Those targeted by the House of Refuge included the children of working families or immigrant families (Bernard and Kurlychek 2010). As the House of Refuge grew, new practices such as 'placing out' were developed to cope with the growing population. Children would be apprenticed out in order to alleviate the growing institutionalized population and to teach the children a marketable skill (Bernard and Kurlychek 2010). Over time, 'placing out' children led to several issues including losing track of where and with home the children had been placed.

The use of the House of Refuge led to an important case in the juvenile justice system, "the Case of Mary Ann Crouse," in 1838. Mary Ann Crouse was committed to the House of Refuge after her mother made a complaint. Mary Ann's father objected to her confinement because she had not committed a crime. The case went to the Pennsylvania Supreme Court, which ruled Mary Ann's confinement to be legal (Bernard and Kurlychek 2010). This is an important case for the juvenile justice system for several reasons. First, the court reasoned that Mary Ann was being helped, not punished. Second, the good intentions of

the House of Refuge were deemed to be more important than the performance of Mary Ann's parents. Third, the state had the power to intervene in family affairs due to *parens patriae*. Finally, since Mary Ann was not being punished, she did not qualify for any due process protections (Bernard and Kurlychek 2010). This is the first case to challenge the House of Refuge. Since the Pennsylvania Supreme Court upheld the House of Refuge's claim that they are helping children they were able to continue their actions.

However, in 1868 the "Case of Daniel O'Connell" occurred. This case involved similar circumstances to that of Mary Ann Crouse, but the results of the case were the exact opposite. The Illinois Supreme Court ruled that being confined was punishing Daniel. They went on to compare the Daniel's parents intentions to the actual performance of the institution and rejected the notion of *parens patriae*. Finally, they ruled that Daniel deserved due process protections since he was being punished (Bernard and Kurlychek 2010). The stark difference in rulings between the Crouse case and the O'Connell case led to the formation of the juvenile court system because O'Connell effectively made imprisoning juveniles for being poor illegal.

Shortly after the O'Connell decision, juvenile courts came on the scene with the first court being established in Chicago in 1899. The purpose of the juvenile courts was to address the needs of children, whether help was asked for or not (Bernard and Kurlychek 2010). Around the timeframe, biological theories of criminalization were popular. Social Darwinism argued that some people are less evolved than others. This perspective was applied to juveniles, which provided evidence for continued state intervention. Since juveniles could no longer be institutionalized for being poor, the juvenile courts used charges of disorderly conduct in order to send juveniles away (Bernard and Kurlychek 2010). Another way that the juvenile courts were able to work with juveniles is by classifying the court as a chancery court. These courts, under common law, helped child without parents due to death. The logic of the chancery court was extended to delinquent youth by claiming that parents were absent because they were weak (Bernard and Kurlychek 2010). Since the juvenile courts were created to get around a State Supreme Court decision, cases challenging the court were not long in coming.

The first case that challenged the juvenile court system was the case of Frank Fisher. Frank Fisher, a fourteen-year-old boy, was charged – but not convicted – of larceny. He was sent to the House of Refuge until his 21st birthday. His parents objected to his punishment because it disproportionate to the charged offense. Fisher would not have received seven years imprisonment for larceny if tried in adult criminal court. The Pennsylvania Supreme Court rejected the parent's claims and held, as in *Crouse*, that Frank was being helped and that he did not deserve due process protections (Bernard and Kurlychek 2010). This view of the juvenile courts persisted for another sixty years.

The U.S. Supreme Court has also had a hand in the formation of juvenile justice policy with regards to due process protections. *Kent v. United States* (1966) was the first juvenile case to be heard by the U.S. Supreme Court. In this case the court ruled that Kent should have been given a waiver hearing and that his counsel should have access to his prior records (Bernard and Kurlychek 2010: 98). The next case that the U.S. Supreme Court reviewed was *In re Gault* (1967). This case broadened due process protections for juveniles by granting them: "(1) the right to adequate, written, and timely notice; (2) the right to counsel; (3) the right to confront and cross-examine witnesses; and (4) the privilege against self-incrimination" (Bernard and Kurlychek 2010:102). The *Gault* case effectively applied the *O'Connell* decision to the entire country. In *In re Winship* (1970) the court ruled that juvenile court cases should be held to the 'reasonable doubt' standard, not the 'preponderance of the evidence' (Bernard and Kurlychek 2010). Additionally, the *Winship* ruling applied retroactively. Finally, in the *McKeiver* case, the Pennsylvania Supreme ruled that juveniles are not entitled to a jury trial. This is in keeping with *Gault* and *Winship* in that the best interests of child are at the forefront (Bernard and Kurlychek 2010).

Finally, the 'get tough' movement has caused the juvenile justice pendulum to swing back towards harsh punishments. Many people did not agree with the U.S. Supreme Court's intervention in the juvenile justice system and found ways to work within these new constraints while being tougher on juvenile crime. Extending the logic of the Supreme Court, juvenile delinquents were now seen as young criminals with due process protections (Bernard and Kurlychek 2010). The 'get tough' approach has resulted in juveniles being treated like adult criminals with fingerprinting, media attention, and increased use of restraints (Bernard and Kurlychek 2010). In addition, juveniles are being waived into adult court more often (Bernard and Kurlychek 2010). These changes have altered the original intent of the juvenile court system to rehabilitate and treat youth. This history of the social construction of youth, childhood, delinquency, and the cycle of the juvenile justice system leads us to the cycle of youth access to public space starting with juvenile curfew.

Juvenile Curfew, 1880 to present

Adults throughout the United States have used juvenile curfew since the 1880s to control youth access to public space directly. This particular policy has changed over time due to the cycle of juvenile justice. A curfew is "a law or ordinance that simply stipulates a time or set of times during which specified individuals are not allowed on the street or in other public places" (O'Neil 2002:49). The first juvenile curfew was enacted in 1880 in Omaha, Nebraska (Hemmens and Bennett 1999). Juvenile curfews came into vogue in the late nineteenth century as a way to control immigrant children who were seen as the primary perpetrators of juvenile crime (O'Neil 2002). In 1884, President Harrison endorsed the use of juvenile curfew causing 3,000 cities to enact ordinances by 1900 (Hemmens and Bennett 1999). According to Mrs. John D. Townsend (1896:725), "And there is no denying that prevention of crime is better than its punishment, it is certainly best to begin with care for all children. Their free and untrammelled life in this country is appalling." Thus, juvenile curfew became a policy to limit juvenile access to public space.

Juveniles in public only became a problem when their activities were deemed unsightly. John Muncie (2004:56) describes the image of children on the street with the following passage:

Vagrancy and the sight of children eking out a living on the street (gambling, selling necklaces, matches, braces or boxes of dominoes) increasingly came to be viewed as a serious social problem. Mayhew's (1861) vivid descriptions of the rookeries in the East End of London catalogued the activities of such young 'precocious' traders, 'daring' thieves and 'loutish' vagabonds. Children attracted to the streets as a result of the 'brute' tyranny of parents, association with costermongers, orphanhood or destitution, necessarily lived on the edge of crime.

When juvenile curfews were first instituted, children were still seen as dependent and innocent. By allowing children out on the street, parents failed to teach their children proper morals and values (O'Neil 2002). As mentioned previously, immigrants were seen as being morally inferior to 'native' residents. New social controls were needed to ensure that immigrant children would not contribute to crime in the cities. The late 1800s were characterized by industrialization. Parents were not able to supervise their children because they were too busy working in the factories, which children were excluded from, so the use of juvenile curfew as a way to instill family morals and to control children emerged (Platt 1977).

Even though there was quite a bit of support for juvenile curfew at the end of the nineteenth century, it was not implemented fully until after WWII. At that time, juvenile crime was seen as being exceptionally high (O'Neil 2002). Enforcement efforts increased in order to get a handle on the exceptionally high juvenile crime rate (Hemmens and Bennett 1999). This increased level of enforcement carried through the post-war baby boom

(Hemmens and Bennett 1999).

Juvenile curfews were reinstated during the 1980s and 1990s with the 'get tough' movement (O'Neil 2002). Again, juvenile crime was seen as being unbearably high. Curfews are seen as a way to prevent crime and preserve the innocence of childhood. If children are at home at night, they cannot be subjected to the sights of immoral activities or be tempted to join a gang (O'Neil 2002). Policymakers do not seem to realize the fact that the punishment for violating curfew is insignificant. Therefore, this law will not deter children who want to commit crime (O'Neil 2002).

On the other hand, policymakers may not be interested in preventing crime. Rather, policymakers may be more concerned with preserving childhood innocence and ensuring that children know their place in the world when they grow up (O'Neil 2002). O'Neil (2002: 58) argues that the purpose of curfew laws is to teach children "their proper place in the raced, class, and gendered hierarchy that defines society in the United States and much of the world." Since childhood is a social construction it follows to reason that children will not know how to behave in society without instruction about their place.

Juvenile curfew laws are designed to keep children out of public space unless a parent or another qualified adult supervises children (O'Neil 2002). In the three ordinances that O'Neil (2002) studied, juveniles were excluded from public space during late night hours unless accompanied by an adult or guardian. Additionally, each ordinance created curfew exceptions for youth who are participating in First Amendment activities, religious activities, or city-sponsored activities. Clearly, the aim of the exceptions is to create socially sanctioned spaces for children to participate.

Regulating children to socially acceptable spaces has been a both a project of race and class. White, middle-class children have access to space not afforded to non-white, lower-class children. For example, many juvenile curfews grant exceptions for children participating in socially sanctioned spaces such as religious activities or being out with parents. These exceptions privilege white, middle-class children who may not need to travel to or from their activities. Often, poor youth or non-white youth need to use public transportation in order to get to their activities. If they are travelling on their own, these children are likely to be punished for curfew violations (O'Neil 2002).

The motivations and application of juvenile curfew fits Bernard's (2010) cycle of juvenile justice in many ways. First, these curfews were implemented throughout time when juvenile crime was perceived to be at its highest. Curfew laws served the dual purpose of "seeing to the best interest of the child, while at the same time, imposing stricter social controls on unruly youth", which conforms to early social constructions of youth and delinquency (Hemmens and Bennett 1999: 101). Additionally, juvenile curfews allow the juvenile justice system to respond to juvenile crime in ways that fit the situation. For example, law enforcement could choose to take children home or to take them to the police department. Differential enforcement of juvenile curfew demonstrates the social construction of childhood by privileging some children as innocent and worthy of less punishment over other children as criminal and deserving of punishment.

Beyond fitting Bernard's (2010) cycle of juvenile justice with the social constructions of youth and delinquency, juvenile curfew also fits the cycle in other ways. In Bernard's (2010) formulation, the policy must benefit the economic interests of the rich and powerful. Juvenile curfew was first used during the industrialization of the United States to ensure that children would be cared for and instilled with proper values. This benefits the rich and powerful because factories were insured healthy and productive future workers. Additionally, juvenile curfew allows reformers to demonstrate their moral superiority in two ways. First, juvenile curfew offenders are deserving of their punishment because by committing their crime they are somehow morally deficient. Second, parents whose children violate juvenile curfew are failing their children by not teaching them proper morals and values. Finally, juvenile

curfews increase the power of the state by allowing the state to decide who is allowed to use public space.

Public Parks and Commercial Space as Youth Acquired Space

In addition to limiting access by time of day through curfews, youth have also been excluded from public parks by creating specific uses for parks and other spaces. For example, youth have been targeted for removal during downtown revitalization projects due to the conception of youth as dangerous and dirty. Youth are often drawn to space that does not have a specific use because it allows them to creatively decide how to best use the space for their needs (Gearin and Kahle 2006). Policies that create specific purpose space exclude youth and limit their overall access to public space.

Adults tend to create space that has a specific use in mind. This is in direct opposition to youth's desire for open-space that allows for "youth-controlled social activities" (Gearin and Kahle 2006:39). By creating 'youth space,' adults ensure that youth will be supervised and that youth will conform to prevailing social norms and values. According to Gearin and Kahle (2006), this is not a new policy tactic, but a rather older strategy. Starting in the late 1800s, "social reformers argued that properly supervised play fostered respect for property and law and order" (Gearin and Kahle 2006:39) Thus, social reformers imply that unsupervised youth were prone to criminally damage property and were less likely to obey the law.

Youth often lack their own space to go 'hang out' since adults have appropriated most public space. Therefore, youth are forced to 'hang out' in adult controlled space, which is often perceived as threatening by adults (Robinson 2000). Kato (2009) found that youth will mitigate their presence in commercial spaces by "browsing." By performing like adult customers, youth are able to use the space to socialize even though they may not be buying merchandise. "Browsing" allows youth to blend in and use the space for their own purposes as long as they act the part by appearing to be potential customers and follow the rules of the establishment (Kato 2009). Youth without access to public space face consequences of lack of appropriate space include youth feelings of isolation and distorted social constructions of youth as undesirable (Robinson 2000). However, Robinson (2000) found that youth will often avoid places that make them feel unwanted and will gravitate towards places accepting of them.

Unlike commercial space, where youth are able to blend in by browsing, public parks with specific uses prohibit youth from using public space as they wish. For example, many cities have created skate parks for youth in an effort to keep youth out of commercial space or downtown areas (Németh 2006). In the context of this paper, the example of the LOVE Park incident will be used to show youth exclusion from public space as policy choice to remove youth from downtown Philadelphia (Németh 2006). LOVE Park, known formally as the John F. Kennedy Plaza, was built in 1965. It has been used for "political rallies, civic events and electoral campaigns" (Németh 2006:300). However, LOVE Park is most well known for possessing excellent skateboarding elements. Skateboarders travel from all over the world to skate at LOVE Park.

In 2000, skateboarding was banned in LOVE Park. Policymakers cited damage to the park by skateboarders as the motivation for the ban (Németh 2006). As an alternative, skateboarders were told to go to a 'nearby' skate park. The 'nearby' skate park was several miles away (Németh 2006). Németh (2006) believes that youth were eliminated from LOVE Park because Philadelphia was in the midst of revitalizing the downtown area by renovating buildings nearby LOVE Park and building residential areas in order to attract professionals to the area. According to Németh (2006:309), removing youth from LOVE

Park was important because “public space is viewed predominately as adult space; in this context these youth are often seen as ‘out of order.’” Adults see the unsupervised use of public space by youth as unacceptable.

The control of youth access to commercial space and public parks does not fit Bernard’s (2010) cycle of juvenile justice as well as the previous example of juvenile curfew. However, it does meet some of the criteria. This example of marginalization of youth use of public space speaks to the protection of the economic interests of the rich and powerful. Merchants have a stake in keeping youth out of their commercial space because youth rarely spend money. Therefore, youth may use resources belonging to merchants that would otherwise be used by paying adult customers. For example, some stores may post signs stating that restrooms are for customers only in an effort to reduce costs and reduce youth presence (Kato 2009). LOVE Park also exemplifies the protection of economic interests because youth were removed from this public space in order to encourage gentrification (Németh 2006).

In both examples, youth were seen a potential source of trouble and therefore not welcome. This fits the social construction of youth as dangerous and in need of social control. Furthermore, skateboarders were vilified as a subgroup who cause more damage than they are worth, which comports with the ideas of juvenile delinquency (Németh 2006). Finally, the use of a skateboarding ban in LOVE Park demonstrates the power of the state (Németh 2006). Skateboarders, as a marginalized group, were unable to continue using LOVE Park because it did not go along with dominant views of proper use of public space.

Online Public Spaces

Since youth have been excluded from public spaces through juvenile curfew laws and specific use policies, youth have turned to online public spaces for places to meet others and to hang out. To date, policies that specifically address youth use of online public spaces have not been created. However, research points to growing distance between parental controls of youth and actual uses of public spaces suggesting that new policies will be coming soon (Boyd 2008).

In earlier times, youth used their access to public space to help shape their identities (Kato 2009). However, as youth access to public space has been limited, youth are increasingly turning to social networking sites such as Facebook to help them shape their identity (Freishtat and Sandlin 2010). Youth are welcome on Facebook, and the Internet in general, because it is “a frontier where people of different cultures, races, religions, and classes interact and exchange information openly” (Freishtat and Sandlin 2010:512). Essentially, Facebook as a public space has not been claimed as adult space. Thus, youth are able to use this space for their own purposes.

An interesting paradox has emerged though regarding youth and surveillance. Starting in the 1880s, youth were under surveillance in the home, with the use of juvenile curfew laws, to protect them from outside influences. Later, youth activity in public space was monitored (for example skateboarders) to ensure that youth were behaving. However, when youth engage in social networking sites they are submitting to more surveillance than ever before (Freishtat and Sandlin 2010).

Youth are willing to submit to increased surveillance on social networking sites because it is their only option. For example, Boyd (2008: 135) illustrates the privilege that adults experience by stating, “Likewise, adults spend countless hours socializing over alcohol, minors are not only restricted from drinking but also from socializing in many venues where alcohol is served.” By highlighting one arena where youth are not welcome, Boyd illustrates the fact that youth have minimal access to public space. Additionally, such restrictions are placed on youth to protect them from potential harms. Therefore, youth turn to social

networking sites to be with their friends.

As a relatively new form of ‘public,’ online public space does not fit Bernard’s (2010) cycle of juvenile justice nearly as well as the previous two examples. However, online public space as a form of social control does meet a few of the criteria. First, online public space can be constructed a lenient form of social control, whereas juvenile curfew and specific use access are examples of harsh social control. Youth who use online public space as a primary form of communication with other youth are likely to do so from home. Thus, the previous two examples are not needed to prevent crime or protect innocent youth from corrupting influences. In addition, the economic needs of the elite are met with youth using online public space because youth are no longer in their commercial space. Instead, youth are shopping online, which benefits store owners in two ways: (1) youth are not seen in stores and do not trouble paying customers and (2) youth who use online public space are able to continue their browsing habits without repercussion.

This example does not seem to meet Bernard’s (2010) criteria for the cycle of juvenile justice. Youth who use online public space are not constructed as delinquents, this type of public space does not change ideas about the juvenile justice system, and reformers are not seen as morally superior. Additionally, the power of the state has not been increased based on online public space.

Policy Recommendations and Conclusion

Overall, the marginalization of youth in their access to public space fits Bernard’s (2010) cycle of juvenile justice well. Bernard (2010) argues that juvenile justice policy swings from harsh punishments to lenient punishments in an endless cycle. Youth access to public space, contrary to the current ‘get tough’ regime, is currently in a lenient phase. Starting in the late 1800s, juvenile curfews were imposed as ‘harsh’ punishments to keep youth off the streets and safely in their homes. In the 1980s, some cities such as Philadelphia began downtown revitalization projects and began to limit youth access to public space. This was a continuation of the harsh punishments from the imposition of the juvenile curfew. I think that restricting youth access to public parks was an even harsher punishment than juvenile curfew because youth were limited during daytime hours and constructed as the dangerous other. In response to be limited from real public space, youth have moved their interactions to online public space. This represents a return to lenient punishments since policies have not been enacted to limit youth access to this arena.

In addition, to fitting the cycle of juvenile justice, several policy recommendations can be made based on youth access to public space. First, policymakers need to be aware of the social ramifications of limiting youth access to public space. When youth have access to public space, they learn how to negotiate adulthood in a meaningful way. O’Neil (2002) points out that young people learn “their place” in society by interacting. Therefore, if we want to encourage a more diverse society, youth must be able to have access to all types of people – not just those who are culturally safe or adhere to social norms and values. Second, policymakers should address the needs of all of their constituents, not just those with money. In the case of LOVE Park, “it was proposed that the skateboarders’ ‘polluting presence’ in LOVE Park did not support the City’s desired image for their redevelopment efforts” (Németh 2006). Had the city embraced the skateboarders, positive changes could have occurred. However, the city chose to marginalize skateboarders and caused a cultural rift in their community. This can hardly be considered a positive outcome. Finally, parents and policymakers need to realize that the internet is a scary place for youth when they are not provided with guidance. While online public space is a relatively safe place for youth to interact, considering the alternative of interacting in real space, adults should actively seek to interact with their children in

online public space so that they are aware of what their child is doing. As Boyd (2008: 136) states:

“What is unique about the Internet is that it allows teens to participate in unregulated publics while located in adult-regulated physical spaces such as homes and schools. Of course, this is precisely what makes it controversial. Parents are seeking to regulate teens' behavior in this new space; and this, in turn, is motivating teens to hide.”

The last thing that policymakers and parents need is for youth to hide from them.

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