Your response

Volume 2: The causes and impacts of online harm

Ofcom's Register of Risks

Question 1:
i)   Do you have any comments on Ofcom's assessment of the causes and impacts of online harms?

Response:

The Pet Advertising Advisory Group (PAAG) was created in 2001 to combat growing concerns regarding the irresponsible advertising of pets for sale, rehoming, and exchange. The Group comprises the 26 members listed at the end of this response: a combination of animal welfare organisations, trade associations, veterinary bodies and local authorities. Defra, DAERA in Northern Ireland, the Welsh Government and the Scottish Government have endorsed PAAG.

In 2013, PAAG launched its Minimum Advertising Standards (https://paag.org.uk/advertising-standards) and, as explained in our response to the second part of this question, 6 of these went on to be enshrined in law in England, Scotland and Wales for licensed sellers. In 2023 PAAG launched its new Advertising Standards to reflect these legislative changes and to tackle the evolving behaviour of pet sellers online. These can be found at https://paag.org.uk/advertising-standards/

PAAG is pleased to see fraud included in the list of harms, however we would like specific consideration to be given to the issue of fraud involving pet advertising and selling and the impact of this on both consumers and animal welfare.

Even since its formation, PAAG has witnessed a massive increase in the number of pets and animals advertised online. Data gathered from classified advertising websites by 47Labs found that, in 2022 alone, there were some 800,000 adverts for dogs, cats and rabbits posted for sale online on the most popular classified advertising websites.
The 2023 PDSA Animal Wellbeing (PAW) Report (https://www.pdsa.org.uk/what-we-do/pdsa-animal-wellbeing-report/paw-report-2023) revealed that 65% of pet owners had found their pet via an online advert, equating to 15 million pets, a significantly higher proportion than in 2022 when it was 53%.

Cats Protection's CATS (Cats and Their Stats) report 2023 found that 63% of cats purchased were found via an online advert, up from 61% in 2022. Specifically for the 12 months preceding the 2023 survey, this figure increases to 71%. The top online sources used to find a cat to buy are Pets4homes (24% of purchased cats), Facebook (19%) and Gumtree (15%).

Dogs Trust's 2023 National Dog Survey (https://www.dogstrust.org.uk/downloads/National-Dog-survey-Results-23_1.pdf), completed by 244,478 people about 348,533 dogs, found that pet selling websites like Pets4Homes were used by 19.4% of respondents looking for a dog, general selling websites like Gumtree and Preloved by 8.4%, and social media by 7.4%.

The ease and popularity of the internet means that the impulse buying of pets has become an appealing option, with people able to search and find an animal for sale at the click of a button. The lure of a quick, unregulated sale also attracts many unscrupulous breeders and dealers to websites. As a result, we have seen different types of fraud occurring involving the advertising of pets on classified sites, specific pet selling sites and social media.

Social media, clearly plays a significant role in the pet trade, but unlike the leading classified websites, are not engaged with PAAG, nor do they sign up to its advertising standards – potentially putting buyers at more risk. Furthermore, TSB has found that 80% of purchase fraud through cases at TSB involved scams that took place through Meta's platforms, suggesting a higher level of risk for consumers buying via these platforms. (https://www.tsb.co.uk/news-releases/tsb-sees-huge-fraud-spikes-from-meta-owned-companies/)

Unlike an inanimate object, buying a pet is a unique purchase involving emotional investment in a sentient being – potentially making pet buyers more vulnerable than others. Individuals mis-sold a pet may be faced with an ongoing obligation to care for a pet that was not adequately bred or raised with welfare in mind, potentially putting someone in a financially vulnerable situation, paying a price both financially and emotionally.

PAAG members: Battersea Dogs & Cats Home; Blue Cross; British Veterinary Association; British Veterinary Nursing Association; Cats Protection; City of London, Animal Health and Welfare Services; Dogs Trust; Kennel Club; International Cat Care; International Fund for Animal Welfare; Mayhew; Ornamental Aquatic Trade Association; OneKind; Our Family Dog (Associate Member); PDSA; Edinburgh Dog and Cat Home; Governing Council of the Cat Fancy; Pet Industry Federation; Raystede Centre for Animal Welfare; Reptile and Exotic Pet Trade Association; RSPCA; Rabbit Welfare Association & Fund; Scottish SPCA; Trading Standards Scotland; USPCA; Woodgreen Pets Charity; World Horse Welfare.

ii)	Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.

Response:

As mentioned in our previous answer, PAAG is pleased to see fraud included in the list of harms, and as a priority issue, however we would like specific consideration to be given to the issue of fraud involving pet advertising and selling and the impact of this on both consumers and animal welfare.

One example of fraud which became particularly prevalent during the pandemic as more people sought pets as companions, but continues now, is fraudsters advertising pets that do not exist. During the pandemic, fraudsters would exploit the travel restrictions and social distancing rules as reasons for buyers not to visit the pet before purchase and would take deposits, only for the buyer to then discover the pet didn't exist. This type of fraud continues now and there are reports of cases where, once the initial deposit has been taken, more money is requested to cover additional costs such as insurance, vaccinations or transport. Action Fraud reported that £2,638,323 was lost by prospective pet owners in the 2020/21 financial year, after they put down deposits for pets they saw advertised online – an increase of over 20 per cent compared to the previous financial year (https://www.actionfraud.police.uk/alert/ruff-time-for-animal-lovers-as-scale-of-pandemic-pet-fraud-unleashed-by-action-fraud). Furthermore, Lloyds Banking Group reported that pet scams were up 24% in 2023, compared to 2022, with victims losing an average £307. These cases have an emotional impact on those who fall victim to this type of crime, as well as a financial impact, and we strongly believe more consideration should be given

by Ofcom to this type of fraud.

As well as concerns around deposit scams, PAAG is also extremely concerned around the issue of mis-selling of pets via online adverts. Advice to prospective buyers is to always see young pets interacting with their mum and it is a legal requirement in England, Scotland and Wales for licensed sellers of puppies and kittens to show them interacting with their mothers at their place of birth. Sadly, however, another common scam we see is sellers misleading prospective buyers by advertising pets for sale with a fake mum. Advertising a pet with their mum gives the impression that the pet has been bred responsibly in a family home. However, using a fake mum is often a front for disguising illegal activity such as puppy smuggling, a horrific trade whereby thousands of puppies have been illegally imported from Central and Eastern Europe into Great Britain destined to be advertised online for sale to unsuspecting buyers. The puppies being imported do not meet the requirements for travel (often too young, have not received the appropriate vaccinations, falsified documentation). This early separation from their mother and subsequent journey can impact their socialisation and behavioural development as well as making them at higher risk of infectious disease, including Brucella Canis, a zoonotic disease. Through its Puppy Pilot Dogs Trust continues to fund the quarantine costs of any puppy seized at the border to aid their interception. Over 3000 illegally imported puppies have now been cared for by Dogs Trust, which, if sold to unsuspecting members of the public, would have made over £4 million for the illegal importers. Sadly, those puppies which are not seized end up advertised for sale via an online advert and, as mentioned, are often mis-sold with fake mums. We are concerned that similar practices could be happening with UK-based canine breeding facilities.

In the case of cats, breeding is largely unregulated, so buyers may not know where to turn. Last year, a case came to light where two individuals were found to have made up to £280,000 by buying and selling kittens, and mis-leading buyers by claiming they were a vet, providing fake health certificates and stating that the cats had been wormed and microchipped when they hadn't. (https://metro.co.uk/2023/05/14/disgraced-police-officer-made-280k-selling-dying-kittens-with-partner-18781124/)

There have also been cases where sellers have wrongly advertised a pet as a 'pedigree' and falsify documents as to the origins of the pet. Consumers may pay thousands of pounds for a pedigree pet.

Furthermore, we have also seen consumers misled regarding the age of the pet and the location that the pet was bred, as well as misled in other ways, such as: the seller appearing as a private seller rather than declaring they are a trader; the seller promising paperwork (for example pet passports, veterinary certificates, microchip information) on the advert with this paperwork not materialising once the buyer has bought the pet; or with the seller providing false paperwork. In many of these cases, had the consumer known the true facts, this may have changed their transactional decision.

Occasionally, sellers are advertising pets for sale in the UK, when in fact they are based out of the country and in other cases imported puppies are being advertised without any mention of their origin. In 2020 Dogs Trust conducted an investigation into UK online puppy adverts. They found that 14% of adverts reviewed for specific breeds were for imported puppies. This increased to 29% for adverts in England (https://www.dogstrust.org.uk/downloads/2020%20Puppy%20smuggling%20report.pdf).

With regards to horses, they are often bought and sold many times throughout their lives. They can be sold at any age, often when they are no longer suitable for the role their current owner requires of them. Many of these horses sold via online adverts may be bought unseen or have a limited vetting carried out by the new owner resulting in people buying

horses that are not as described. This could be as simple as mis-representing the horse's age, through to selling horses with severe undeclared health condition – which could deem the horse dangerous.

There are serious potential harms to animal welfare because of adverts which are misleading in the aforementioned ways, If the seller is misled about the age or origin of the pet, or if they are not provided with the promised paperwork, they cannot guarantee they are getting the pet that they expected or a pet that is healthy. As well as a financial impact if veterinary costs are incurred, the impact on the consumer can also be serious due to the emotional nature of the purchase. Buying a pet differs from a standard purchase – emotional investment in a pet can leave consumers particularly vulnerable to exploitation via pet adverts. Cats Protection's CATS report has found that the top reason an individual ended up buying via a classified website was that they 'fell in love with a photo or video of this cat'. Further to this emotional connection, there can be a desire to remove the animal from the situation, particularly if it is thought to be in poor health. This can lead to significant unexpected financial commitment from the pet owner if urgent veterinary treatment is required.

We are also concerned with adverts that promote illegal practices. For example, ear cropping of dogs is a mutilation and is illegal in the UK and in all EU countries. It is an unnecessary practice, only done for aesthetic purposes and has the potential to influence a dog's behaviour, welfare and quality of life. Whilst it is not illegal to sell a dog with cropped ears, PAAG believes that allowing adverts for dogs with cropped ears may lead people to think that it is 'normal' for certain breeds to look like this and to aspire to getting such a dog. We sometimes see sellers evading the rules set out in our Advertising Standards by placing emojis over the ears of dogs in images on adverts.

Furthermore, we see adverts on classified sites for species which cannot legally be sold (e.g. some terrapin species) due to the risk they pose to native animals and the environment.

Whilst PAAG is not a regulatory body, we urge platforms to moderate adverts to identify harmful and illegal adverts. User complaints and reports need to be taken seriously, and adverts taken down swiftly.

In 2023, PAAG launched its new Advertising Standards (https://paag.org.uk/advertising-standards/), an update to the first set of our Minimum Standards created in 2013. The changes were to reflect legislative developments and aimed to tackle evolving trends in seller behaviour as described above. As mentioned, PAAG is not a regulatory body, and the Advertising Standards are voluntary.

The Advertising Standards now clearly set out the legal requirements for pets advertised online after six of our voluntary standards were adopted into law in England, Scotland and Wales, meaning licensed sellers must now:
- include the number of the licence holder's licence,
- specify the local authority that issued the licence,
- include a recognisable photograph of the animal being advertised,
- (except in the case of fish) display the age of the animal being advertised,
- state the country of residence of the animal from which it is being sold, and
- state the country of origin of the animal.

The Advertising Standards also set out what additional steps we urge platforms to take to ensure pets are advertised legally and ethically, including running automated checks for 'blacklisted' words/terms that could indicate illegal adverts, such as those for banned breeds and prohibited species, or harmful adverts/animal welfare practices such as those

for pregnant animals. For example, 'Pit Dog' is a blacklisted term, as it is sometimes used to refer to a Pit Bull Terrier, which is a banned breed.

PAAG carries out regular moderation of the PAAG Engaged Websites; these are websites that work with PAAG and have agreed to try and meet the PAAG Advertising Standards. Moderation entails a week-long period where volunteer moderators check adverts against the PAAG Advertising Standards. We compare the results of the Engaged Websites with a control Unengaged Website. The PAAG Engaged Websites consistently outperform the Unengaged websites. Unengaged Website adverts often lack basic information required by the Advertising Standards such as photos, ages and sexes. Many also lack a report function on every advert, something which is vital for consumer safety.

PAAG's continuing work with websites is vital, especially given the current lack of regulation with regards to the online advertising and sale of pets. We would like to see more regulation of online advertising and sale of pets, and therefore believe more consideration needs to be given by Ofcom to the above-mentioned concerns when it comes to the irresponsible advertising of pets for sale, rehoming, and exchange online.

iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: No	

Question 2:	
i)	Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer.
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Volume 3: How should services assess the risk of online harms?

Governance and accountability

Question 3:
i)   Do you agree with our proposals in relation to governance and accountability measures in the illegal content Codes of Practice?
Response:
ii)   Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 4:
i)   Do you agree with the types of services that we propose the governance and accountability measures should apply to?
Response:
ii)   Please explain your answer.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 5:
i)   Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to requiring services to have measures to mitigate and manage illegal content risks audited by an independent third-party?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 6:	
i)	Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to tie remuneration for senior managers to positive online safety outcomes?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Service's risk assessment

Question 7:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Specifically, we would also appreciate evidence from regulated services on the following:

Question 8:	
i)	Do you think the four-step risk assessment process and the Risk Profiles are useful models to help services navigate and comply with their wider obligations under the Act?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 9:	
i)	Are the Risk Profiles sufficiently clear?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Do you think the information provided on risk factors will help you understand the risks on your service?
Response:	
iv)	Please provide the underlying arguments and evidence that support your views.
Response:	
v)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Record keeping and review guidance

Question 10:	
i)	Do you have any comments on our draft record keeping and review guidance?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 11:	
i)	Do you agree with our proposal not to exercise our power to exempt specified descriptions of services from the record keeping and review duty for the moment?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Volume 4: What should services do to mitigate the risk of online harms

Our approach to the Illegal content Codes of Practice

Question 12:
i)   Do you have any comments on our overarching approach to developing our illegal content Codes of Practice?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 13:
i)   Do you agree that in general we should apply the most onerous measures in our Codes only to services which are large and/or medium or high risk?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 14:
i)   Do you agree with our definition of large services?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 15:	
i)	Do you agree with our definition of multi-risk services?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 16:	
i)	Do you have any comments on the draft Codes of Practice themselves?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 17:	
i)	Do you have any comments on the costs assumptions set out in Annex 14, which we used for calculating the costs of various measures?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Content moderation (User to User)

Question 18:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Content moderation (Search)

Question 19:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Automated content moderation (User to User)

Question 20:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 21:	
i)	Do you have any comments on the draft guidance set out in Annex 9 regarding whether content is communicated 'publicly' or 'privately'?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Do you have any relevant evidence on:

Question 22:	
i)	Accuracy of perceptual hash matching and the costs of applying CSAM hash matching to smaller services;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	

iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 23:	
i)	Ability of services in scope of the CSAM hash matching measure to access hash databases/services, with respect to access criteria or requirements set by database and/or hash matching service providers;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 24:	
i)	Costs of applying our CSAM URL detection measure to smaller services, and the effectiveness of fuzzy matching for CSAM URL detection;;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 25:	
i)	Costs of applying our articles for use in frauds (standard keyword detection) measure, including for smaller services;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 26:	
i)	An effective application of hash matching and/or URL detection for terrorism content, including how such measures could address concerns around 'context' and freedom of expression, and any information you have on the costs and efficacy of applying hash matching and URL detection for terrorism content to a range of services.
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Automated content moderation (Search)

Question 27:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

User reporting and complaints (U2U and search)

Question 28:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Terms of service and Publicly Available Statements

Question 29:
i)   Do you agree with our proposals?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 30:
i)   Do you have any evidence, in particular on the use of prompts, to guide further work in this area?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Default settings and user support for child users (U2U)

Question 31:
i)   Do you agree with our proposals?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 32:
i)   Are there functionalities outside of the ones listed in our proposals, that should explicitly inform users around changing default settings?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Question 33:
i) Are there other points within the user journey where under 18s should be informed of the risk of illegal content?
Response:
ii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Recommender system testing (U2U)

Question 34:
i) Do you agree with our proposals?
Response:
ii) Please provide the underlying arguments and evidence that support your views.
Response:
iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 35:
i) What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing?
Response:
ii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

We are aware of design features and parameters that can be used in recommender system to minimise the distribution of illegal content, e.g. ensuring content/network balance and low/neutral weightings on content labelled as sensitive.

Question 36:
i) Are you aware of any other design parameters and choices that are proven to improve user safety?
Response:
ii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Enhanced user control (U2U)

Question 37:
i)   Do you agree with our proposals?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 38:
i)   Do you think the first two proposed measures should include requirements for how these controls are made known to users?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 39:
i)   Do you think there are situations where the labelling of accounts through voluntary verification schemes has particular value or risks?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

User access to services (U2U)

Question 40:
i)   Do you agree with our proposals?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Do you have any supporting information and evidence to inform any recommendations we may make on blocking sharers of CSAM content? Specifically:

Question 41:
i)   What are the options available to block and prevent a user from returning to a service (e.g. blocking by username, email or IP address, or a combination of factors)?
Response:
ii)   What are the advantages and disadvantages of the different options, including any potential impact on other users?
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 42:
i)   How long should a user be blocked for sharing known CSAM, and should the period vary depending on the nature of the offence committed?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

There is a risk that lawful content is erroneously classified as CSAM by automated systems, which may impact on the rights of law-abiding users.

Question 43:
i)   What steps can services take to manage this risk? For example, are there alternative options to immediate blocking (such as a strikes system) that might help mitigate some of the risks and impacts on user rights?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Service design and user support (Search)

Question 44:
i)   Do you agree with our proposals?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Cumulative Assessment

Question 45:
i)   Do you agree that the overall burden of our measures on low risk small and micro businesses is proportionate?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 46:
i)   Do you agree that the overall burden is proportionate for those small and micro businesses that find they have significant risks of illegal content and for whom we propose to recommend more measures?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 47:
i)   We are applying more measures to large services. Do you agree that the overall burden on large services proportionate?
Response:

ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Statutory Tests

Question 48:	
i)	Do you agree that Ofcom's proposed recommendations for the Codes are appropriate in the light of the matters to which Ofcom must have regard?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Volume 5: How to judge whether content is illegal or not?

The Illegal Content Judgements Guidance (ICJG)

Question 49:
i)   Do you agree with our proposals, including the detail of the drafting?
Response:
ii)   What are the underlying arguments and evidence that inform your view?
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 50:
i)   Do you consider the guidance to be sufficiently accessible, particularly for services with limited access to legal expertise?
Response:
ii)   Please provide the underlying arguments and evidence that support your views.
Response:
iii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Question 51:
i)   What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements?
Response:
ii)   Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:

Volume 6: Information gathering and enforcement powers, and approach to supervision.

Information powers

Question 52:	
i)	Do you have any comments on our proposed approach to information gathering powers under the Online Safety Act?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Enforcement powers

Question 53:	
i)	Do you have any comments on our draft Online Safety Enforcement Guidance?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Annex 13: Impact Assessments

Question 54:	
i)	Do you agree that our proposals as set out in Chapter 16 (reporting and complaints), and Chapter 10 and Annex 6 (record keeping) are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English?
Response:	
ii)	If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	