

# Protecting children from harms online

---

Volume 3: The causes and impacts of online harms to children

## Consultation

Published 8 May 2024

Closing date for responses: 17 July 2024



# Contents

---

6.	Introduction to the causes and impacts of online harm to children .....	3
7.	Introduction to the draft Children’s Register of Risks .....	12
7.1	Pornographic content .....	30
7.2	Suicide and self-harm content .....	50
7.3	Eating disorder content .....	76
7.4	Abuse and hate content.....	103
7.5	Bullying content .....	126
7.6	Violent content .....	148
7.7	Harmful substances content .....	169
7.8	Dangerous stunts and challenge content .....	179
7.9	Non-designated content .....	191
7.10	Search services.....	207
7.11	Governance, systems and processes .....	219
7.12	Business models and commercial profiles .....	240
7.13	Features and functionalities affecting time spent using services .....	245
7.14	Wider context to understanding risk factors .....	251
7.15	Recommended age groups .....	260
8.	Ofcom’s Guidance on Content Harmful to Children .....	274
8.1	Ofcom's guidance on content harmful to children: introduction.....	286
8.2	Guidance on pornographic content .....	295
8.3	Guidance on suicide content .....	302
8.4	Guidance on self-harm content .....	308
8.5	Guidance on eating disorder content .....	315
8.6	Guidance on abuse and hate content.....	324
8.7	Guidance on bullying content .....	329
8.8	Guidance on violent content.....	335
8.9	Guidance on harmful substances content .....	344
8.10	Guidance on dangerous stunts and challenges content.....	350
9.	Glossary for Volume 3 .....	354

## 6. Introduction to the causes and impacts of online harm to children

This volume presents two regulatory products for consultation. The draft Children’s Register of Risks relates to Ofcom’s duty to assess the risk of harm to children from content that is harmful to them. We expect services to refer to it when they carry out their own children’s risk assessments. The draft Guidance on Content Harmful to Children relates to Ofcom’s duty to provide examples of what Ofcom considers to be, or not to be, content harmful to children.

This volume is structured around the types of content harmful to children, defined in the [Online Safety Act 2023](#) (‘the Act’). The Act explains that ‘harm’ means physical or psychological harm. Harm can also be cumulative or indirect (see ‘Harm’ below).<sup>1</sup> For each type of harmful content, we present evidence to understand the risk of harm to children, and provide guidance on identifying these types of content, presenting examples and contextual factors to consider.

Twelve kinds of content that is harmful to children (‘harmful content’) are defined in the Act.<sup>2</sup> The Act further groups these types of content under Primary Priority Content (PPC) and Priority Content (PC).<sup>3</sup> Due to similarities in how some kinds of harmful content manifest, and in how they are treated in the relevant evidence base, we have grouped the 12 kinds of content into eight broader categories: pornographic content; suicide and self-harm content; eating disorder content; abuse and hate content; bullying content; violent content; dangerous stunts and challenges content; and harmful substances content.<sup>4</sup> Some content examples sit across different kinds of content. For example, an online challenge may encourage the ingestion of harmful substances and will be cross-referenced appropriately.

Non-designated content (NDC) is a distinct category of content in the Act.<sup>5</sup> It is defined as content that is not PPC or PC, but which presents a material risk of significant harm to an appreciable number of children in the United Kingdom. In this consultation, we set out our overall approach to identifying NDC, and present some specific categories of content that we consider may meet the definition of NDC, namely ‘body image content’ and ‘depressive content’. As we explain further below, we welcome further evidence about these kinds of content to support our ongoing assessment of potential categories of NDC.<sup>6</sup>

We have taken an evidence-based approach, drawing from extensive Ofcom-commissioned research alongside 500 quality-assured sources that represent children’s own voices, as well as parents,

---

<sup>1</sup> Section 234(2) of the Online Safety Act 2023 (‘the Act’).

<sup>2</sup> Sections 61 and 62 of the Act.

<sup>3</sup> Refer to Volume 1 for an explanation of these categories.

<sup>4</sup> These shorthand references should be understood in this context to refer to the relevant statutory definition of kinds of content, not a broader category of content relating to that topic (for example, the statutory definition of eating disorder content, rather than any content relating to an eating disorder). Refer to the ‘Kinds of Harmful Content’ sub-section below for more detail.

<sup>5</sup> Section 60 of the Act.

<sup>6</sup> Refer to Section 7.9, Non-designated content, for more detail.

carers, practitioners, and other experts. In the past year alone, Ofcom's research on children's online experiences has involved speaking to over 15,000 children and 7,200 parents.

Based on the evidence contained in the draft Children's Register of Risks, we've identified risk factors for harm. Some of these risk factors are included in our draft Children's Risk Profiles. Once the duties are in force, service providers must consult the Children's Risk Profiles to help them assess which risks their services may face. In their risk assessment, they will be expected to assess the likelihood and impact of those risks and consider our Children's Risk Assessment Guidance. These can both be found in Annex 6 of this consultation.

The functionalities and characteristics we describe as risky are not inherently harmful and can have important benefits. For example, recommender systems benefit internet users by helping them find content which is interesting and relevant to them. The role of the new online safety regime is not to restrict or prohibit the use of such functionalities or characteristics, but rather to get services to put in place safeguards which allow users to enjoy the benefits they bring, while managing the risks appropriately. Our draft Children's Safety Codes (Volume 5) are designed to target some of these risk factors, setting out the steps that we propose services could take to comply with their child safety duties and to mitigate risks to children.

Our draft Guidance on Content Harmful to Children is intended to provide guidance to service providers that may need to make judgements about whether content on their service amounts to content that is harmful to children to fulfil their duties under the Act. We therefore provide a non-exhaustive list of examples or kinds of content that we consider meet, or do not meet, the definitions of PPC or PC set out in the Act. We have also included considerations about context that are important when determining whether the content meets the Act's definitions. Our draft guidance also identifies how different kinds of PPC and PC may interact and where they overlap with illegal content, at which point we refer services to the draft [Illegal Contents Judgements Guidance](#), published as part of our [Illegal Harms Consultation](#).

We are consulting on this draft Children's Register of Risks, and draft Guidance on Content Harmful to Children, and invite feedback on their clarity, and their ability to help services understand how to evaluate risks on their services. We set out specific consultation questions below on issues where we would particularly welcome feedback and further supporting information to inform our final version of this Register. See Consultation Annexes 1-4 for more information about how to respond to our consultation. After reviewing responses to this consultation, we will publish our final decisions in a Statement and in our final version of this Children's Register of Risks and Guidance on Content Harmful to Children.

## Consultation Questions

### *Draft Children's Register of Risks*

#### **Proposed approach**

4. Do you have any views on Ofcom's assessment of the causes and impacts of online harms? Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
5. Do you have any views about our interpretation of the links between risk factors and different kinds of content harmful to children? Please provide evidence to support your answer.
6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer.

7. Do you have any views on our interpretation of non-designated content or our approach to identifying non-designated content? Please provide evidence to support your answer.

#### **Evidence gathering for future work**

8. Do you have any evidence relating to kinds of content that increase the risk of harm from Primary Priority, Priority or Non-designated Content, when viewed in combination (to be considered as part of cumulative harm)?
9. Have you identified risks to children from GenAI content or applications on U2U or Search services? Please provide information about any risks identified.
10. Do you have any specific evidence relevant to our assessment of body image content and depressive content as potential kinds of non-designated content? Specifically, we are interested in: (i) specific examples of body image or depressive content linked to significant harms to children, (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.
11. Do you propose any other category of content that could meet the definition of NDC under the Act at this stage? Please provide evidence to support your answer.

#### **Draft Guidance on Content Harmful to Children**

12. Do you agree with our proposed approach, including the level of specificity of examples given and the proposal to include contextual information for services to consider?
13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?
14. For each of the harms discussed, are there additional categories of content that Ofcom should consider to be harmful or consider not to be harmful or where our current proposals should be reconsidered?

## Summary of our findings

---

### Most children in the UK encounter harmful content online.

- 6.1 Sixty-two per cent of children aged 13-17 reported encountering harmful content online over a four-week period. Only the younger adults, aged 18-24 (72%) and 25-34s (65%) were more likely than children to say they had encountered harmful content over this period.<sup>7</sup> Some children encountered several kinds of harmful content – especially those spending the most time online.<sup>8</sup> Pornographic content is particularly pervasive in the online lives of children, with 73% of 16-21-year-olds who had seen pornography reporting having seen

---

<sup>7</sup> Ofcom, 2023. [Online Experiences Tracker](#). Note: Fieldwork was conducted in June-July 2023, so ‘in the last/previous four weeks’ refers to responses in this time period. ‘Harmful content’ as described here covers the Primary Priority Content (PPC) and Priority Content (PC) Net Codes from the Online Experiences Tracker Wave 4. Please see details of the included harms codes in the [Technical Report](#).

<sup>8</sup> Internet Matters found that over a fifth of children spending the longest time online (the top quartile) reported experiencing five or more potential harms online. Harms included seeing violent content, being contacted by someone they didn’t know and receiving abusive or upsetting messages. The Index is based on responses to a detailed survey by 1,000 children aged 9-15 and their parents, conducted during summer 2022. Source: Internet Matters, 2023. [Children’s Wellbeing in a Digital World: Year Two Index Report 2023](#). [accessed 15 March 2024].

pornographic content by the age of 15. Just over a quarter had encountered it by the age of 11 (27%), with 10% encountering it by the age of 9.<sup>9</sup>

- 6.2 Other types of harmful content are widely available, and in some cases encountered often. In Ofcom research last year, children described encountering content depicting or encouraging violence as ‘unavoidable’.<sup>10</sup> In other Ofcom research, 7% of 13-17-year-olds reported seeing or experiencing ‘persistent bullying online’, 8% recalled seeing content promoting self-harm, and 6% recalled seeing content promoting suicide – each within a four-week period.<sup>11</sup> Those who had encountered content promoting suicide, self-harm or eating disorders had a high level of familiarity with such content and characterised it as being prolific on social media.<sup>12</sup>

## The impacts of viewing harmful content are wide-ranging and can be severe.

- 6.3 Across all these content types, children’s emotional wellbeing is being affected. For example, regardless of their own experience, children report feelings of anxiety, shame, and fear on encountering content promoting eating disorders suicide and self-harm.<sup>13</sup> Other impacts are more specific to kinds of harmful content. For example, content that is abusive or incites hatred can discourage children from expressing themselves online,<sup>14</sup> so that marginalised groups risk being excluded from online spaces.
- 6.4 Content can also encourage children to adopt attitudes and behaviours that cause harm to their peers and communities. For example, evidence links violent content to specific behaviours related to violence, such as leading children to perceive it as normal to carry knives.<sup>15</sup> Other kinds of content may be increasing the risk of indirect harm to women and

---

<sup>9</sup> Children’s Commissioner 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>10</sup> Survey studies report between 24% and 55% of children encountering violent content. Internet Matters reported that 24% of children aged 9-15 had ever seen violent content; this was the third most commonly experienced online harm out of those listed. A study by the Youth Endowment Fund found that children’s experience of violent content online was more common, with over half of children aged 13-17 (55%) having seen real-life acts of violence on social media in the past 12 months. Sources: Internet Matters, 2023. [Children’s Wellbeing in a Digital World: Year Two Index Report 2023](#). [accessed 12 April 2024]; Youth Endowment Fund, 2022. [Children, Violence and Vulnerability 2022](#). [accessed 12 April 2024].

<sup>11</sup> Ofcom 2023. [Online Experiences Tracker](#).

<sup>12</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>13</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>14</sup> Note: Research was with 15–25-year-old girls and women across 22 countries, excluding the UK. Source: Plan International, 2020. [Free to be online? Girls’ and young women’s experiences of online harassment](#) [accessed 28 March 2024]; Note: Research was with 13-18-year-olds in the UK. Source: UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#) [accessed 28 March 2024].

<sup>15</sup> Note: The study was with 13 ‘vulnerable’ children, which here means children who, when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres, and several had had interactions with the police. The study, which also interviewed professionals such as police officers reported: Seeing a lot of this kind of content can affect young people’s perceptions or assessments. One young person was asked by a police liaison officer: “*Out of 100 kids, how many on average do you think carry a knife?*” The young person responded: “*100 out of 100*”. In reality, the police liaison officer told us: “*It’s one out of 100. It has become the norm for him, I think he’s got the idea from social media*”. Source: Revealing Reality, 2023. [Anti-social Media](#).

girls in particular. Over half of 11-14-year-old boys (52%) are aware of and have engaged with influencers tied to the ‘manosphere’.<sup>16</sup> This may be contributing to a rise in misogyny among children: 70% of teachers reported a rise in sexist language in the classroom in the past 12 months,<sup>17</sup> while the number of girls aged 13-21 who have received ‘sexist comments’ online has almost tripled in ten years (from 20% in 2013 to 57% in 2023).<sup>18</sup> Pornographic content has been linked to increased risks of developing harmful sexual behaviours that cause indirect physical and psychological harm towards future sexual partners, disproportionately affecting women and girls.<sup>19</sup>

- 6.5 At worst, harmful content can contribute to loss of life. The coroner’s report for 14-year-old Molly Russell concluded that watching high volumes of content promoting suicide and self-harm had contributed to her death by suicide.<sup>20</sup> The inquest into the death by suicide of 14-year-old Mia Janin found that she had been experiencing bullying online.<sup>21</sup> There are also several examples from around the world of children losing their lives after attempting challenges circulating online.<sup>22</sup>

## While all children are at risk, harmful content disproportionately affects certain groups.

- 6.6 Children in most need of mental health support are most likely to encounter content encouraging suicide, self-harm and behaviours associated with eating disorders. Children with a mental health condition are four times as likely to have seen content promoting suicide or self-harm, and nearly three times as likely to have seen eating disorder in a four-week period than those without any limiting or impacting conditions.<sup>23</sup>
- 6.7 Some groups are more likely to experience harmful outcomes from certain kinds of harmful content, with evidence suggesting that neurodiverse children may be more likely to be adversely affected by content depicting violence, for example.<sup>24</sup>
- 6.8 Other characteristics such as a child’s gender, race and sexuality affect the risk of harm from different kinds of harmful content. Boys are more likely to encounter several kinds of violent

---

<sup>16</sup> ‘Manosphere’ is a term used to describe the network of online communities responsible for creating and promoting negative, often misogynistic content. Source: Vodafone, 2024. [The Rise of the Aggro-rithm](#). [accessed 28 March 2024].

<sup>17</sup> Vodafone, 2024. [The Rise of the Aggro-rithm](#). [accessed 28 March 2024].

<sup>18</sup> Girlguiding, 2023. [Girls' Attitudes Survey 2023: Girls' lives over 15 years](#). [accessed 16 April 2024].

<sup>19</sup> For example, evidence suggests that children intentionally seeking out pornography are less likely to seek consent in some situations. Source: BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 23 June 2023]. See the Pornographic Content section (Section 7.9) within this volume for more information.

<sup>20</sup> The Coroner concluded that it was likely that the material viewed by Molly, who was already suffering with a depressive illness, and vulnerable due to her age, affected her mental health in a negative way and contributed to her death in a more than minimal way. Source: Courts and Tribunals Judiciary, 2022. [Molly Russell: Prevention of future deaths report - Courts and Tribunals Judiciary](#), 13 October 2022. [accessed 16 April 2024].

<sup>21</sup> BBC, 2024. [Mia Janin took own life after bullying – inquest](#). [accessed 14 February 2024].

<sup>22</sup> See ‘Impacts’ sub-section within Section 7.8, Dangerous stunts and challenges content.

<sup>23</sup> Among 13-17-year-olds with a mental health condition, 23% had seen content promoting self-harm, 17% recalled seeing content promoting suicide, and 31% had seen eating disorder content, over a four-week period. This is significantly higher than for children with no limiting or impacting condition (5% for self-harm content, 4% for content promoting suicide, and 12% for content promoting eating disorders). Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>24</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).



content,<sup>25</sup> and to attempt dangerous stunts and challenges.<sup>26</sup> Homophobia and transphobia online puts LGBTQIA+ children at risk of abuse and hate: over a third of 13-17-year-olds (35%) reported that they had seen content targeting trans people over a four-week period, while over a quarter (27%) reported seeing homophobic content.<sup>27</sup> Race intersects with gender and sexuality to increase the risk of harm. Stonewall reported that Black, Asian and minority ethnic LGBT people are twice as likely as white LGBT people to be targeted by online abuse (20% vs 9%).<sup>28</sup> Thirty-seven per cent of girls who identified themselves as from an ethnic minority and had experienced online harassment said they were targeted because of their ethnicity.<sup>29</sup>

## Certain service types or characteristics play a particularly prominent role in harm to children online

- 6.9 Children encounter harmful content across service types, in particular social media services and video-sharing services.<sup>30</sup> Some service types are associated with encountering specific kinds of harmful content, such as pornographic content on pornography services or suicide and self-harm content on dedicated discussion forums. However, social media services, and services with video-sharing functionalities emerge as high-risk for encountering harmful content across different kinds of harmful content.
- 6.10 Certain service characteristics play an important role in children's experiences of harm online. While central to the functioning of many services, recommender systems emerge as a key route for children to encounter many categories of harmful content. For example, in Ofcom research recently published, children reported being presented with content promoting suicide or self-harm, often without having searched for it.<sup>31</sup> Children describe feeling frustrated when they realise that any engagement, including reporting and signalling negative engagement, could lead to similar content being recommended.<sup>32</sup> Recommender

---

<sup>25</sup> Ofcom research into violent content found that fighting content was more common among boys. Source: Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#). A study in West Yorkshire reported that only about 3% of girls had seen 'murder' content, compared to nearly 30% of boys. Figures are estimates read from the chart on page 26. Source: Social Finance, 2022. [Social media, psychological harm and violence among young people](#). [accessed 16 April 2024].

<sup>26</sup> 13-17-year-old boys are at risk of engaging with content showing dangerous stunts and challenges. This study takes a broad approach to 'dangerous stunts and challenges' including skateboarding tricks, parkour, and free running. However, the study indicates that teenage boys are less risk-averse in their attitude to stunts and challenges, and so likely to be more at risk of harm from content promoting them. Source: Ecorys (commissioned by the Department for Digital, Culture, Media and Sport), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 16 April 2024].

<sup>27</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>28</sup> Note: Data is from a YouGov questionnaire of over 5000 people in the UK. While this study was not based on children specifically, similar dynamics are likely to be represented across the LGBT population. Source: Stonewall, [LGBT in Britain - Hate Crime \(2017\)](#). September 2017 [accessed 16 April 2024].

<sup>29</sup> Plan International, 2020. [State of the World's Girls 2020: Free to Be Online?](#). [accessed 16 April 2024].

<sup>30</sup> Social media services connect users and enable them to build communities around common interests or connections. Video-sharing services allow users to upload and share videos with the public. A U2U service may comprise more than one service type. Our evidence indicates this can be particularly true of social media services and video-sharing services, both of which may comprise various services. See 'Service Type' subsection for more information.

<sup>31</sup> Ofcom, 2023. [Online content: Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>32</sup> Ofcom, 2023. [Online content: Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).



systems can also risk presenting children with harmful combinations of content. Evidence suggests that children engaging with eating disorder content (a mental health disorder) are also likely to be recommended other mental-health-related content.<sup>33</sup> Young people can be algorithmically recommended large volumes of content, including content relating to suicide, self-harm and that risk exacerbating feelings of depression, hopelessness and misery, including suicide and self-harm related content.<sup>34</sup> Children also report being recommended increasingly shocking pornographic content, or pornographic content with themes of violence on pornographic services causing them significant distress.<sup>35</sup> More detail can be found in the sections on kinds of harmful content, and in the Wider context for understanding risk factors section (Section 7.14) where we set out how recommender systems pose broader risks of harm to children.

- 6.11 Group messaging is another functionality leading children to encounter harmful content. Children are often members of many group chats across different services. Some can be large, including people they do not know personally.<sup>36</sup> Harmful content is often shared in group chat contexts. For example, Ofcom research revealed dedicated groups chats, set up to share content depicting violent fights in specific schools and communities.<sup>37</sup> Pornographic content, or links to such content, is also often shared in group chats showing how functionalities can combine to create pathways to harm (in this case, hyperlinking and group messaging).<sup>38</sup> Children report feeling pressure to stay in group chats, regardless of their content, to avoid feeling excluded from their peer group.

## GenAI technologies present emerging risks to children online

- 6.12 Online harms, and the risk factors which cause them, are changing all the time, as technology develops, and society evolves. Children are early adopters of new technologies, including generative artificial intelligence (GenAI). As well as bringing important benefits, GenAI could lead to harm to children. There is emerging evidence indicating that GenAI can facilitate the creation of content harmful to children, including pornography, content promoting eating disorders, and bullying content. More detail on the risks posed by GenAI can be found in the 'Wider context for understanding risk factors' section (Section 7.14).

---

<sup>33</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Center for Countering Digital Hate, 2022. [Deadly by Design](#). [accessed 16 April 2024].

<sup>34</sup> Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children's experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest](#) [accessed 27 March 2023].

<sup>35</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 16 April 2024]. Note: DCMS stands for the UK Government department, 'Department for Digital, Culture, Media & Sport'. This has now been replaced by 'Department for Science, Innovation and Technology' (DSIT) and 'Department for Culture, Media and Sport' (DCMS).

<sup>36</sup> Ofcom, 2023. [Children's Media Lives 2023](#).

<sup>37</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>38</sup> Ofcom, 2023. [Children's Media Lives 2023](#). ; Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 16 April 2024].

## About this document

6.13 This volume is split into two parts:

**Table 6.1: Table setting out the two parts of this volume, and a summary of the key sections within each part.**

Part	Key sections
Part 1:  Draft Children's Register of Risks	The <b>Introduction to the draft Children's Register of Risks</b> . This sets out Ofcom's duties and approach in conducting a sector-wide risk assessment to improve Ofcom's and services' understanding of risk to children, introducing Ofcom's Register of Risks for content harmful to children (draft Children's Register of Risks). Evidence and methodology are discussed, alongside an overview of child behaviours online.
	<b>Kinds of content harmful to children</b> . For each kind of content, we first collate evidence on its presence and impact, before identifying the characteristics of U2U services that may lead to increased risks of harm to individuals. This includes their functionalities and recommender systems, user base, business models and commercial profiles. The detailed structure for these chapters can be found in the 'Harm to children on user-to-user services' sub-section in the Introduction to the draft Children's Register of Risks (Section 7).
	<b>Cross-harm considerations</b> . This sets out our analysis of risk to children on <b>search services</b> , alongside some other service and user characteristics affecting risk to children across the various kinds of harmful content, including: <ul style="list-style-type: none"> <li>i) How a service's <b>governance, systems and processes</b> may lead to an increased risk of harm to children. We have identified two general scenarios where risk can arise in these areas: (a) inadequate governance and/or other systems and processes currently in place within regulated services; and/or (b) an absence of such governance and other systems and processes.</li> <li>ii) How a service's <b>business model or commercial profile</b> may lead to increased risk of harm.</li> <li>iii) How <b>features and functionalities affecting frequency of use</b> increase risk of harm.</li> <li>iv) <b>Wider context for understanding risk factors</b>, including discussion of how recommender systems, user base size and composition, media literacy and GenAI relate to risk of harm to children.</li> <li>v) The relative risk to children in different age groups, setting out <b>recommended age groups</b> for considering the varying risk of harm.</li> </ul>
Part 2:  Draft Guidance on Content Harmful to Children	The <b>consultation chapter for Ofcom's draft Guidance on Content Harmful to Children</b> sets out Ofcom's duty to provide guidance on content that is harmful to children and details Ofcom's approach to producing this guidance.
	The <b>Introduction to the draft Guidance for Content Harmful to Children</b> sets out an overview of the relevant legal framework, provides an explanation of service provider's duties under the Act, sets out contextual factors for services to consider when assessing content, and details freedom of expression considerations.

Part	Key sections
	The <b>draft Guidance for Content Harmful to Children</b> then provides guidance for service providers, presenting examples of or kinds of content that Ofcom considers to be, or considers not to be, Primary Priority content that is harmful to children, or Priority content that is harmful to children.

# 7. Introduction to the draft Children’s Register of Risks

- 7.1 The section explains how we have conducted the analysis of our sector-wide risk assessment, the findings of which are presented in the draft Children’s Register of Risks. The information presented below is to help interested parties understand how we conducted our analysis, and the considerations involved in assessing the risks of harm to children.
- 7.2 This section covers different aspects of our approach to conducting this risk assessment. It is structured as follows:
- a) Aims and scope, including definition of harm and kinds of content considered;
  - b) Methodology, including risk factors, considered;
  - c) Evidence, including considerations regarding our evidence base;
  - d) An overview of child behaviours; and
  - e) Harms to children on user-to-user services.

## Aims and scope

---

- 7.3 The Online Safety Act 2023 (‘the Act’) requires Ofcom to carry out sector-wide risk assessments to identify and assess the risk of harm presented by user-to-user (U2U) and search services, and to identify characteristics relevant to such risks of harm.<sup>39</sup>
- 7.4 Ofcom has already consulted on a risk assessment for illegal content on U2U and search services and considered the use of U2U services to commit or facilitate Priority offences; this was published in November 2023. See the draft [Illegal Harms Register of Risks](#) (Illegal Harms Register) for more information. For this consultation, Ofcom has conducted a risk assessment to identify and assess the risk of harm to children in the UK presented by content harmful to children.
- 7.1 Ofcom must publish the findings of its risk assessments in a ‘Register of Risks’ (Register), and then prepare ‘Risk Profiles’. In this volume, the draft Register of Risks for content that is harmful to children (Children’s Register of Risks) sets out the findings of Ofcom’s risk assessment, considering service characteristics as risk factors. The Children’s Register of Risks is for services to consider when carrying out their own risk assessments. The Children’s Register of Risks feeds into the draft Children’s Risk Profiles which consider these risk factors, identifying the characteristics of a service (including functionalities, user base and business model) that our risk assessment suggests may be particularly relevant to the risk of certain types of content harmful to children. These draft Children’s Risk Profiles are published as part draft Children’s Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments. Guidance for services on using these regulatory products as part of a risk assessment is also set out in the draft Children’s Risk Assessment Guidance.
- 7.2 Ofcom must keep both the Children’s Register of Risks and the Children’s Risk Profiles up to date. We will monitor harms and regulated services trends and will revise our Children’s Register of Risks as appropriate. We may expand the scope of our risk assessment if

---

<sup>39</sup> Section 98 of the [Act](#).

necessary in the future; for example, as new technologies develop, or risks to online safety emerge due to rapid innovation within the sector. This may include technologies such as immersive online virtual worlds, augmented realities, and generative artificial intelligence ('GenAI').<sup>40</sup>

## 'Harm'

- 7.3 In the draft Children's Register of Risks, we consider harm according to how it is defined in the Act: Harm means physical or psychological harm.<sup>41</sup>
- 7.4 As set out in the Act, harm can occur from isolated incidents of exposure, or from cumulative exposure. Cumulative harm arises in the following circumstances:
- a) When harmful content (PPC, PC or NDC) is repeatedly encountered by a child;
  - b) When a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC.<sup>42</sup>
- 7.5 Harm can include circumstances of indirect harm, in which a group or individual are harmed, or the likelihood of harm is increased, as a consequence of another child seeing harmful content, which then affects their behaviours towards others.<sup>43</sup>

## Kinds of content harmful to children considered

- 7.6 The draft Children's Register of Risks considers the risk to children from specific kind of content which is harmful to children. The kinds of content harmful to children considered in our risk assessment are:<sup>44</sup>
- a) Primary Priority content (PPC)
  - b) Priority content (PC)
  - c) Non-designated content (NDC)
- 7.7 To make our assessment as accessible as possible, we have grouped some of the kinds of content together within those categories. This helps us to show, in our analysis, risks that are similar in nature across the different kinds of content, and where we have overlapping evidence. The groups are set out in the table below. However, where we have grouped

---

<sup>40</sup> We are aware of the debate around the potential risks that GenAI may pose. Given the pace of developments in GenAI, and because the evidence base in this area is still developing, we have considered this technology in a limited way in this version of the Register. Our draft Register considers some of these risks. More detail can be found in Section 7.14, Wider context for understanding risk factors.

<sup>41</sup> Section 234(2) of the Act.

<sup>42</sup> See section 234(4) of the Act, which states:

*"References to harm presented by content, and any other references to harm in relation to content, include references to cumulative harm arising or that may arise in the following circumstances—*

*(a) where content, or content of a particular kind, is repeatedly encountered by an individual (including, but not limited to, where content, or a kind of content, is sent to an individual by one user or by different users or encountered as a result of algorithms used by, or functionalities of, a service);*

*(b) where content of a particular kind is encountered by an individual in combination with content of a different kind (including, but not limited to, where a kind of content is sent to an individual by one user or by different users or encountered as a result of algorithms used by, or functionalities of, a service)."*

<sup>43</sup> As set out in Section 234(5) of the Act.

<sup>44</sup> Section 60(2) of the Act.

different kinds of content, we sometimes refer to individual content types, for example, where the particular observation or evidence is relevant only to specific kind of content.

7.8 For brevity, we summarise each kind of content in the section header and use these shorthand references throughout this volume. For example, ‘Content which encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder’ becomes ‘eating disorder content’. These shorthand references should be understood in this context to refer to the relevant statutory definition of kinds of content, not a broader category of content relating to that topic (for example the statutory definition of eating disorder content, nor any content relating to an eating disorder). Further detail on what Ofcom considers to be, or not to be, harmful content, can be found at the end of each chapter in the draft Guidance on Content Harmful to Children sections.

**Table 7.1: We set out below the grouping of kinds of content harmful to children, and shorthand terminology that we use throughout the consultation.**

Section number	Section header (Shorthand)	Kind of harmful content, as defined in the Act
<b>Primary Priority content that is harmful to children</b>		
7.1	Pornographic content	Pornographic content
7.2	Suicide and self-harm content	Content which encourages, promotes or provides instructions for suicide. Content which encourages, promotes or provides instructions for an act of deliberate self-injury.
7.3	Eating disorder content	Content which encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder.
<b>Priority content that is harmful to children</b>		
7.4	Abuse and hate content	Content which is abusive and which targets any of the following characteristics— (a) race, (b) religion, (c) sex, (d) sexual orientation (e) disability, or (f) gender reassignment. Content which incites hatred against people— (a) of a particular race, religion, sex or sexual orientation, (b) who have a disability, or (c) who have the characteristic of gender reassignment.
7.5	Bullying content	Bullying content.

Section number	Section header (Shorthand)	Kind of harmful content, as defined in the Act
7.6	Violent content	<p>Content which encourages, promotes or provides instructions for an act of serious violence against a person.</p> <p>Content which— (a) depicts real or realistic serious violence against a person; (b) depicts the real or realistic serious injury of a person in graphic detail.</p> <p>Content which— (a) depicts real or realistic serious violence against an animal; (b) depicts the real or realistic serious injury of an animal in graphic detail; (c) realistically depicts serious violence against a fictional creature or the serious injury of a fictional creature in graphic detail.</p>
7.7	Harmful substances content	Content which encourages a person to ingest, inject, inhale or in any other way self-administer— (a) a physically harmful substance; (b) a substance in such a quantity as to be physically harmful.
7.8	Dangerous stunts and challenges content	Content which encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it or to someone else.
<b>Non designated content</b>		
7.9	Non-designated content	Content, which is not primary priority content or priority content, of a kind which presents a material risk of significant harm to an appreciable number of children in the United Kingdom.

## Relationship with illegal harms

- 7.9 This risk assessment takes a similar approach to Volume 2 of our [Illegal Harms Consultation](#): The causes and impacts of online harm (the [Illegal Harms Register](#)), although in some areas we have adapted our approach based on the specific need to assess content harmful to children. We recognise that some of the responses to the [Illegal Harms Consultation](#) will have cross-cutting relevance to the approach we are taking in this consultation. We are currently carefully considering and analysing the responses received to these consultations. We recognise some of this feedback may also be relevant to the approach currently proposed in this consultation. Where that is the case, we will take into account the feedback on our regulatory approach in the round to ensure that our regulatory approach remains consistent. Refer to Regulatory Approach (Volume 1) in this consultation for more detail.
- 7.10 In this volume, we focus on presenting risk to children online and children’s experiences of online harm. This may include discussion of content or behaviour that is illegal. There are certain kinds of illegal content listed in the Act that are similar to, or overlap with, kinds of content which are harmful to children, such as content encouraging suicide and self-harm,



content that is abusive and content which incites hatred.<sup>45</sup> There are also kinds of harmful content, which the evidence suggests risk exposing children to other illegal harms. For example, children engaging with communities sharing content promoting eating disorders, suicide and self-injury content are at an increased risk of grooming, and child sexual abuse and exploitation (see Sections 7.2 and 7.3 on Eating disorder content and Suicide and self-harm content). When any reference to illegal content or behaviour is referenced as part of our assessment of risk to children online, the relevant section of the [Illegal Harms Consultation](#) which discusses the harm in detail will be cross-referenced.

- 7.11 Where there is overlap between illegal content and a kind of content harmful to children, we address this in our draft Guidance on Content Harmful to Children. Here we explain that services should refer to our draft [Illegal Content Judgements Guidance](#) (“ICJG”) when making judgements about individual pieces of content in order to decide whether some kinds of content might be illegal content (as well as being harmful to children).<sup>46</sup>

## Methodology

---

### Understanding service characteristics as risk factors

- 7.12 The Act requires Ofcom to take into account how the characteristics of a service may give rise to risk. The Act defines ‘characteristics’ broadly as including a service’s functionalities, user base, business model, governance and other systems and processes. We consider these characteristics both individually and, where relevant, in combination. These characteristics form the basis of the analysis within our draft Children’s Register of Risks and draft Children’s Risk Profiles.
- 7.13 Most of the characteristics referenced in the Act are not specifically defined. We recognise that given the diversity and range of services in scope of the regime, services are likely to understand some of these concepts differently. We set out the definitions we have used in our draft Children’s Register of Risks below. Where possible, we have also used these terms consistently across the other regulatory products included in this consultation.
- 7.14 The list of characteristics in the Act is not exhaustive, so it is open to Ofcom to identify other relevant characteristics. We consider that our evidence justified including three additional service characteristics that can give rise to risk: service type, recommender systems and commercial profiles. These additional characteristics are explained below.
- 7.15 In the draft Children’s Register of Risks, we review evidence associating the specific characteristics of a service with content harmful to children. Where we find evidence of a relationship between a characteristic of a service and harm, we consider the characteristic to be a ‘risk factor’. As such, risk factors are the specific characteristics of a service which Ofcom has identified as being associated with a risk of one or more kinds of harms to children.<sup>47</sup>

---

<sup>45</sup> These are: content encouraging suicide and self-harm, content that is abusive, and content which incites hatred.

<sup>46</sup> Ofcom, 2023, [Illegal Content Judgements Guidance](#).

<sup>47</sup> As set out in the Act: Primary Priority Content (promoting suicide, self-harm or eating disorders and pornographic content), Priority Content (abusive, hateful or bullying content, content depicting or encouraging violence or the ingestion of harmful substances), Non-designated Content (content harmful to children but not including Primary Priority or Priority Content).

- 7.16 The draft Children’s Register of Risks does not attempt to weigh up the positives and negatives of U2U and search services, or the companies which run them. It is only concerned with identifying and assessing the risk of harm to children from content that is harmful in relation to risk factors.
- 7.17 However, service characteristics can also bring benefits to users, including children. We acknowledge that some of the risk factors, which the evidence has demonstrated are linked to a particular kind of harm, could also be beneficial to children in some areas. This can be in terms of the communication that they facilitate, or in some cases fulfilling other objectives, such as protecting user privacy. For example, while livestreaming can be a risk factor for several kinds of harm to children, as it can allow the real-time sharing of content such as suicide and self-harm, it also allows for real-time updates in news, and can provide children with up-to-date tutorial videos and advice or encourage creativity in streaming content. These considerations are a key part of the analysis underpinning our Code measures.

## Service characteristics considered

- 7.18 In our Register, we have assessed the risks of harm associated with specific characteristics of a service. These can include any aspect of a service, including its functionalities, user base, business model, governance, and other systems and processes.<sup>48</sup>

### Characteristics defined in the Act

- 7.19 **Functionalities** is an umbrella term for the front-end features of a service that are visible to users. The Act defines functionalities for U2U services as features that enable interaction between users. Functionalities for search services are defined as features that enable users to search websites or databases, as well as features that make suggestions relating to users’ search requests.<sup>49</sup> We consider how these features and functionalities lead to higher risks of harm to children.
- 7.20 **User base** refers to the users of a service, considering both the size of a service’s user base and the user base demographics. This includes discussion of risk to children of different ages or in different age groups. It includes consideration of both registered and non-registered

---

<sup>48</sup> These characteristics are specified in section 98(11) of the Act.

<sup>49</sup> A non-exhaustive list of functionalities is provided in section 233 of the Act. For U2U: (a) creating a user profile, including an anonymous or pseudonymous profile; (b) searching within the service for user-generated content or other users of the service; (c) forwarding content to, or sharing content with, other users of the service; (d) sharing content on other internet services; (e) sending direct messages to or speaking to other users of the service, or interacting with them in another way (for example by playing a game); (f) expressing a view on content, including, for example, by (i) applying a ‘like’ or ‘dislike’ button or other button of that nature, (ii) applying an emoji or symbol of any kind, (iii) engaging in yes/no voting, or (iv) rating or scoring content in any way (including giving a star or numerical ratings); (g) sharing current or historic location information with other users of the service, recording a user’s movements, or identifying which other users of the service are nearby; (h) following or subscribing to particular kinds of content or particular users of the service; (i) creating lists, collections, archives or directories of content or users of the service; (j) tagging or labelling content present on the service; (k) uploading content relating to goods or services; (l) applying or changing settings on the service which affect the presentation of user-generated content on the service; (m) accessing other internet services through content present on the service (for example through hyperlinks). For search: (a) a feature that enables users to search websites or databases; (b) a feature that makes suggestions relating to users’ search requests (predictive search functionality).

users of a service.<sup>50</sup> As part of this we consider whether children use the service, how user demographics influence which groups of child users may experience harm, and how the size of a user base affects risk (for example, a higher number of child users).

- 7.21 **Business models**, in a broad sense, refers to the ways in which a business operates to achieve its goals. For the purposes of the analysis in this draft Register, we adopt a narrow definition that includes revenue model and growth strategy, considering how the way in which the service achieves the goals of its business model and growth strategy can lead to higher risks of harm to children.<sup>51</sup>
- a) **Revenue model** refers to how the service generates income or revenue (for example through advertising or subscriptions).
  - b) **Growth strategy** refers to how the service plans to expand its business (for example through increasing revenue and number of users).
- 7.22 **Governance, systems and processes** are typically put in place to prevent and/or reduce risk; we review how inadequate or absent governance, systems and processes in a service can lead to risk. ‘Governance’ refers to structures that ensure adequate oversight, accountability and transparency of decisions that affect user safety. ‘Systems and processes’ refer to actions taken by a service to mitigate risk of harm to children, such as content moderation systems.

### Additional characteristics

- 7.23 We also consider other characteristics that are not specified in the non-exhaustive list of characteristics in the Act, but for which there is evidence showing a relationship with the risk of harm to children. These are set out below.
- 7.24 There is some evidence to suggest that certain **service types** with common features and functionalities are more likely to lead children to encounter harmful content. In general, this refers to the nature of the service,<sup>52</sup> and includes, for example, social media services and messaging services. We have therefore identified some service types as presenting increased risk. However, we recognise that some services have a wide range of features and functionalities and can have more than one service type apply to them. For example, many services can be categorised as both video-sharing and social media services. Nevertheless, evidence demonstrates that there are insights to be gained from assessing the risk of different service types; for example, the role of discussion forums in disseminating content promoting suicide, self-harm and eating disorders.<sup>53</sup>

---

<sup>50</sup> The Act makes clear that ‘it does not matter whether a person is registered to use a service’ for them to be considered a ‘user’ (Section 227 of the Act). The Act is only concerned with the number of ‘United Kingdom users’ of the service, so where the user is an individual, they count as a user only where they are in the United Kingdom; similarly, where the user is an entity, they count only when they have been formed or incorporated in the United Kingdom (Section 227(1) of the Act).

<sup>51</sup> ‘Business model’ can be defined more widely to describe the way in which a service creates value to its users (value proposition), how it delivers this value to users, and how it captures value for itself. However, we adopt a narrow definition in the risk assessment to avoid overlap with the other risk characteristics. This does not affect the overall risk assessment, as risk factors that would have been identified under the broader definition are captured elsewhere.

<sup>52</sup> Certain service types have been selected because our evidence suggests that they play a role in children encountering harmful content.

<sup>53</sup> Some evidence suggests that harmful self-harm and suicide content may be shared within online communities that form in dedicated sub-groups within more general discussion services. These are sometimes

- 7.25 We have also identified **recommender systems** as a relevant characteristic, because of the key role they play in determining what content users see and engage with, thereby contributing significantly to a user’s experience of a service. Recommender systems are information retrieval systems that determine the relative ranking of suggestions made to users on a U2U service. These can be used in many ways, which can influence how a user might experience risk of harm on a service. Most commonly, this includes content recommender systems designed to curate content feeds, and network recommender systems that are used to recommend other users to follow/befriend.
- 7.26 We also consider the relevance of the **size** and **capacity** of services, as factors which can influence the risk of harm to children. When discussing the size of a service, we usually refer to the size of a service’s overall user base.<sup>54</sup> While precise and robust evidence on the age of users is often not available, the size of the service will imply the number of children likely to be on the service. Size of service will often correlate with capacity, which refers to the financial resources and technical expertise available to a service. However, in some cases we may refer to capacity specifically and separately from size, where it has particular risk implications.
- 7.27 We have also included commercial profiles, as our evidence showed that services with certain **commercial profiles** are likely to have weaker risk management, and therefore fewer considerations of how to protect children from harm on their service. Commercial profiles include the size of the service in terms of capacity (i.e. revenue and/or number of employees), the stage of service maturity<sup>55</sup> and the rate of growth in relation to users or revenue. Services can be high or low capacity, or at an early or more developed stage in their maturity.
- 7.28 These characteristics, and the associated risk factors, are broad and complex in scope. To make our assessment as accessible as possible, we sometimes group risk factors that are similar in nature, or which increase the risks of harm in a similar way. For example, functionalities such as direct messaging and video calling have been grouped under ‘user communication’ because they allow users to communicate with one another in a similar way. However, they are still considered to be separate risk factors and we have assessed them accordingly.
- 7.29 Further information on this, including the full list of the most prominent risk factors, is included in the draft Children’s Risk Profiles (Section 12 in Volume 4). More information and definitions of terms used throughout this Register can be found in the Glossary (Section 9 of this volume).

### Additional distinctions in service characteristics

- 7.30 Due to the nature of risk, we also distinguish two ways in which goods or services may be promoted on a service. This distinction was made because in some cases services are paid to

---

reported to be self-regulating, with little perceived outside moderation, and so are perceived to be easier to find in order to access the harmful content. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>54</sup> In this volume we consider size and capacity in general terms and do not adopt any specific definitions or thresholds based on service size or capacity. Elsewhere, in our risk assessment guidance and codes, we define a large service as one that has at least 7 million monthly UK users.

<sup>55</sup> ‘Maturity’ refers to the stage the service or company is at in the typical business lifecycle. The stages can be split into four: i) introductory or start-up stage, ii) growth stage, iii) maturity stage, and iv) decline. The maturity stage is characterised by high revenues, cashflow and profitability.

promote content as ‘advertisements’ which represent a source of revenue. In contrast, while users can promote goods and services by posting them for sale, in many cases the service is not paid to advertise them. The risks associated with how a service generates revenue differ according to which functionalities are offered to users and how they might be used.

- 7.31 ‘Advertising’ refers to paid-for advertising that generates direct advertising revenue for the service. This includes display advertising,<sup>56</sup> classified advertising<sup>57</sup> and search advertising.<sup>58</sup> We cover this under ‘business model’.<sup>59</sup>
- 7.32 Posting goods and services for sale refers to the ability for users to upload and share content that is dedicated to offering goods and services for sale on open channels of communication. Users may promote goods and services in this way, but this is distinct from ‘classified’ advertising because users do not pay for the content to be shared, so it is not designed to generate direct advertising revenue for the service, as classified advertising does. We cover this under ‘functionalities’.<sup>60</sup>

## Evidence

---

- 7.33 In compiling the draft Children’s Register of Risks, we have identified and analysed a repository of quality-assured evidence from nearly 500 individual sources. We have considered the responses to our January 2023 Call for Evidence, as well as relevant Ofcom research, information from service providers, academic papers in a range of disciplines, government bodies, third-party sources, charities, and other non-governmental organisations.
- 7.34 We have sought, as far as possible, to incorporate children’s voices into our analysis. Specifically, we conducted research into specific topics relevant to this consultation. These reports were published in March 2024 and are available [online](#). Through Ofcom’s ongoing programme of research and engagement, we have heard from over 15,000 children and 7,200 parents in the past year.
- 7.35 Given the wide range of third-party evidence that we are relying on in this consultation, we have taken steps to ensure that our evidence sources are robust and reliable. In particular, we have considered the evidence in reference to the following criteria: method, robustness,

---

<sup>56</sup> ‘Display advertising’ is where advertisers pay to display their advertising on an online service. It can appear in a variety of formats such as banner-style adverts (e.g. a banner advert at the top of a page in the Guardian), video advertising (e.g. a video ad appearing on Mumsnet or within a YouTube video), ‘native’ advertising (e.g. an ad for a sponsored product appearing on a Facebook feed) and ‘sponsored content’ (e.g. a sponsored article on holidays in Italy in The Sunday Times).

<sup>57</sup> ‘Classified advertising’ is where advertisers (who can be service users) pay to list specific products or services on an online service serving a specific market. The advertisements are listed under various headings and are grouped in a distinct section away from display advertising. For example, an advertisement to sell a car will be in a dedicated section for car listings, and job opportunities will be in a dedicated category for job offers.

<sup>58</sup> ‘Search advertising’ is where an advertiser pays for its advert to appear within a user’s search results on a search engine (e.g. on Bing, Yahoo or Google); the paid-for ad will appear alongside the search engine results.

<sup>59</sup> This is covered under advertising revenue models. ‘Boosted posts’, where users pay to amplify their content, will be captured under the analysis of business model as ‘transaction fees’ within our consideration of revenue models.

<sup>60</sup> This also sometimes considered under the umbrella of ‘organic advertising’.

ethics, independence and narrative.<sup>61 62</sup> We have also engaged with several external expert stakeholders with specific expertise, to ensure that we represent harms accurately.

- 7.36 As outlined above, we have identified a list of specific service characteristics relevant to the risks of different kinds of content harmful to children. We have then assessed any relevant evidence of whether, and how, particular types of content harmful to children are affected by the presence or absence of those characteristics, either individually or in combination.

## Evidence base

- 7.37 There are a number of areas in which we have exercised our regulatory judgement about how to make best use of the available evidence base. We set out some general considerations below.
- a) **Child-specific evidence.** Wherever possible, we have sought evidence specifically relating to the experience of children online. However, evidence specific to children is limited in relation to some topics. There are ethical and legal limitations to conducting research into content harmful to children; it is challenging to conduct research that risks exposing children to harmful content in the process. As a result, we include some evidence relating to the experiences of adults, preferably young adults. Where this has been included, it is because useful inferences can be made about how harm occurs. For example, evidence demonstrating how certain functionalities, available to child and adult users alike, might facilitate encounters with harmful content, is likely to be useful.
  - b) **Qualitative evidence.** We have relied heavily on qualitative information in our analysis, where quantitative analysis with children on such topics would be challenging or inappropriate. This includes analysing the risk represented by specific case studies. We have also included research conducted with relevant adults (parents, carers, teachers, practitioners) to better understand children's experience of online harms, without incurring some of the risks associated with conducting research with children. In some cases, we have been able to support our understanding of these harms by engaging with expert stakeholders.
  - c) **UK evidence.** Most of the evidence reflects the experiences of children in the UK. However, in some areas, we have used research from other parts of the world where we felt it helped us understand online experiences, either by complementing any UK evidence available, or providing additional insights in cases where there was no UK evidence. Where evidence is not from the UK, this is clearly identified in the body of the text.
- 7.38 **Variety of sources.** Due to the fast pace of technological change and the speed at which risks of harm can manifest online, some of the evidence used within the risk assessment has

---

<sup>61</sup> 'Method' examined the strengths and weaknesses of the methodology for that particular topic, such as whether appropriate data collection methods were used. 'Robustness' considered both the size and coverage of the sample, and quality of analysis – for example, how missing data values were accounted for. 'Ethics' refers to how well ethical considerations were addressed in the study, such as how personal data was handled. 'Independence' examined the origins of the research and whether any stakeholder interests might have influenced findings. 'Narrative' refers to the commentary within the report and whether the conclusions were sufficiently backed by the research, and whether there was a clear distinction between the findings and the interpretation.

<sup>62</sup> Some of the evidence used in this Register was published in a response to the development of the Act and other relevant legislation. These sources may have had aims or ambitions associated with the development of legislation. Moreover, some of the evidence used in this risk assessment comes from experts in their field, who may have developed their expertise while in the former employment of online services.



come from non-traditional research sources; this timely evidence may not have the traditional levels of methodological and sampling rigour and peer review that more traditional research sources have. This includes the use of videos and podcasts, as well as the use of investigative journalism. We have exercised our judgement about when and how best to take this evidence into account. Where evidence is limited, we have used our judgement and expertise about specific harms to draw conclusions about the relevance of the evidence in helping services to identify potential risks. We set out some specific considerations for conducting our risk assessment below:

- a) **Evidence relating to illegal content.** Certain kinds of content harmful to children may also be illegal content. Evidence rarely draws distinctions between legal and illegal kinds of content. While analysis of illegal content sits primarily within the Illegal Harms Register, we have referred to evidence within this Register that may relate to, or include, illegal content where we consider that it is nonetheless relevant to children's experiences of harmful content and can help services to identify potential risks associated with such content.
- b) **Evidence on kinds of harmful content.** The amount of available evidence for specific kinds of content harmful to children is varied. We have found it to be limited for some kinds of content harmful to children, such as content encouraging the ingestion of harmful substances, and dangerous stunts and challenges. Again, we do not necessarily take this as an indication that this content does not cause harm online, or the level or severity of the harm, but as a reflection of the lack of reliable evidence at this time. Some of the evidence we draw on is about content or conduct that is broader than the types of content harmful to children defined in the Act. This has been included where we consider that this evidence is nevertheless relevant to understanding the risk to children from harmful content.
- c) **Evidence relating to specific services:** Some of the research-based evidence we refer to relates to specific services. We have included this evidence because it provides insights about particular risks that we consider having more general application. Its inclusion should not be seen as a judgement about the online safety practices of those specific services.
- d) **Evidence relating to specific service types.** We do not have specific evidence relating to all types of U2U or search services. There is more research available – including on risks of harm to individuals – about large social media sites, gaming sites, and services that publish public information, which can be analysed. At present, we hold less evidence about risk on search services – there is less publicly available information about how they operate, and about the presence of content harmful to children that can cause harm to children on these services.<sup>63</sup> Where appropriate, we have made reasonable inferences about the risks that may arise on other services where we do not have specific evidence about that service type.
- e) **Evidence on specific characteristics.** In particular, there are limitations in the evidence that link the characteristics which the Act requires us to assess against the kinds of content harmful to children.<sup>64</sup> For example, the evidence relating to different business

---

<sup>63</sup> Due to limitations in evidence, we consider all kinds of harmful content together when assessing risk of harm on search services. For U2U services, we consider each kind of harmful content separately.

<sup>64</sup> For example, our evidence base assessing governance, systems and processes and content harmful to children is under-researched in some areas. We have therefore used different types of research and supporting evidence, such as from the banking sector, in this analysis.



models and their risk of harm to children is fairly limited. We therefore consider all kinds of harmful content together when assessing risk from business models. It is also important to assert that where there is limited or no evidence connecting a service characteristic (for example, a functionality, feature, or governance structure) to a kind of harmful content, this is not necessarily an indication that this characteristic does not cause harm, but it may reflect the lack of reliable evidence at this time.

### Addressing limitations in the evidence base

- 7.39 Some specific areas for further evidence gathering are identified in the consultation questions in the grey box at the start of this section. These areas are by not intended to be exhaustive. We invite responses to our consultation to help address limitations in the evidence base identified or made apparent throughout this volume.
- 7.40 We will continue to develop our research and engagement programme to explore methods that help us to identify and understand online harm to children, both as part of the current consultation process, and beyond. Our evidence base will expand to include more primary research with children and those who support them, transparency reports from platforms, and further evidence provided to us by our stakeholders. In addition, we have published our [Online Safety Research Agenda](#) which sets out priority areas for us in relation to maintaining an up-to-date evidence base on children’s online experiences. Our research interests include:
- a) Methodologies for understanding what content children are being exposed to online, where, and how frequently;
  - b) Ways we can measure the cumulative impact of harmful content on children and their reaction/responses to it;
  - c) Methodologies for understanding the relationship between online activity and children’s wellbeing including repeated exposure to harmful content.

## Overview of child behaviours

---

- 7.41 This section summarises evidence on the online behaviours of children in the UK. This is intended to provide a high-level understanding of where children are online, what they are doing, and some behaviours relevant to understanding risk of harm. Laying this foundation enables a more nuanced analysis of risk of harm from specific kinds of harmful content, as defined within the Act, to be explored within the sections on specific harms.

### Children’s online behaviours and risk of harm

- 7.42 Children in the UK start going online from an early age. Ofcom research finds that 87% of children aged 3-5 go online, and nearly all (92%) watch videos, with more than one in four (29%) using social media apps or services.<sup>65</sup> By their teenage years, mobile phone ownership and the use of online services is nearly universal; 97% of 13-15-year-olds own a mobile phone, 98% watch videos online and send messages or make calls, 94% use social media apps or sites, and 78% play games online.<sup>66</sup>

---

<sup>65</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes Tracker](#). QP1, QP5/QC4, QP13/QC13.

<sup>66</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes Tracker](#). QP3F, QP4/QC3, QP5/QC4, QP13/QC13.

- 7.43 Time spent online increases as children get older. When asked about how much time children spend online, and research from CHILDWISE found that children and young people aged 7-18 spend an average of 3.4 hours a day online (approximately 204 minutes). Time online increases as children get older; from 2.3 hours a day for 7-8-year-olds, to a peak of over four hours for 13-14-year-olds (4.3 hours), before dropping back marginally among 15-16- and 17-18-year-olds (3.8 and 3.5 hours on average respectively).<sup>67</sup>
- 7.44 YouTube/YouTube Kids is the most-used online platform among 3-17-year-olds<sup>68</sup> (88%),<sup>69</sup> followed by WhatsApp (57%), TikTok (54%), Snapchat (46%), Instagram (40%) and Facebook (36%).
- 7.45 UK children are using a range of established and emergent technologies.
- a) **Social media services are particularly common.** Almost all children aged 13-17 use social media, and 97% have at least one profile online.<sup>70</sup>
  - b) **The majority continue to use search engines.** Despite evidence suggesting that an increasing number of children search for information on social media services,<sup>71</sup> 95% of online children aged 8-17 say they use search engines<sup>72</sup> and 87% of children aged 8-12 use Google search.<sup>73</sup>
  - c) **Children are fast adopters of new technologies like GenAI.** Fifty-nine per cent of online 7-17-year-olds said they had used any of the following AI tools: ChatGPT, Snapchat My AI, Midjourney or DALL-E.<sup>74</sup> The risks posed by GenAI are discussed in detail in the ‘GenAI’ sub-section of Wider context to understanding risk factors (Section 7.14).
- 7.46 Being online is seen as an important part of growing up, and both children and parents recognise its benefits. Online children aged 13-17, and parents of this age group, identify that going online can help with schoolwork/homework (78% of children, 81% of parents), building or maintaining friendships (65% of children, 63% of parents), and finding useful information about personal issues (60% of children, 49% of parents).<sup>75</sup>

---

<sup>67</sup> CHILDWISE Monitor report 2024. Base: all aged 7-18. Also cited in: Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#).

<sup>68</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children’s Online Behaviours and Attitudes Survey](#).

<sup>69</sup> Within this study, a platform is a term for an app and site used for watching or uploading videos, viewing or producing live-streamed content, social media, and video calling or messaging.

<sup>70</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes Tracker](#). QP20/QC20.

<sup>71</sup> Ofcom’s News Consumption Survey found that almost three in ten (28%) children aged 12-15 used TikTok as a news source in 2022, up from 22% in 2021. Source: Ofcom, 2023. [News Consumption Survey](#).

<sup>72</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children’s Online Knowledge and Understanding Survey](#). To clarify to respondents what we meant by ‘search engine’, we asked children aged 8-17 whether they used sites or apps like Google, Bing or Yahoo to look for things online.

<sup>73</sup> Ofcom Ipsos Children’s Online Passive Measurement 2023, age: 8-12, UK. Base: 162. Reach based on 17 children visiting a service at least once over a three-week measurement period in January-February 2023, combined with results from 145 children who were measured for four weeks during April-July 2023. The data is not weighted. Due to low base size, data should be treated as indicative only and not representative. Published in: Ofcom, 2023. [Online Nation report](#).

<sup>74</sup> CHILDWISE, 2023. Summer Omnibus 2023. Services used in the past six months: fieldwork conducted June-July 2023. Published in: Ofcom, 2023. [Online Nation report](#).

<sup>75</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children’s Online Knowledge and Understanding Survey](#) and [Parents Survey](#).

- 7.47 But the risk of harm to children in the current landscape is significant.
- a) Most UK children encounter harmful content online. Sixty-two per cent of children aged 13-17 report encountering harmful content online, over a four-week period. Only the younger adults aged 18-24 (72%), and the 25-34s (65%) were more likely than children to say they had encountered harmful content during this time.<sup>76</sup>
  - b) Children see user-to-user services as harsh environments. Just under four in ten (37%) children aged 8-17 think that people are mean or unkind to each other on social media and messaging apps all or most of the time.<sup>77</sup>
  - c) The more time they spend online, the more likely children are to encounter harmful content. Internet Matters found that over a fifth (22%) of the children who spent the most time online (the top quartile) reported experiencing five or more potential harms online. This was reported by 2% of the lowest quartile. Harms included seeing violent content, being contacted by someone they did not know, and receiving abusive or upsetting messages.<sup>78</sup>
  - d) Most parents are concerned about their children having harmful experiences online. Around seven in ten parents of online 3-17-year-olds were concerned about their child seeing content online that would encourage them to harm themselves (68%), seeing age-inappropriate or adult sexual content (75%), or being bullied online (70%). Six in ten were worried about the possibility of their child being influenced by extreme views online, whether political, social or religious (59%).<sup>79</sup>
- 7.48 Children are having adult or age-inappropriate experiences online. Many have adult profiles or can access adult content.
- a) One in five (21%) 8-17-year-olds (and 20% of 8-15s), with a social media profile on at least one of the platforms listed in our study,<sup>80</sup> have a user/profile age of at least 18, meaning they are at greater risk of seeing adult content. Thirty-five per cent of children aged 8-15, with a social media profile on at least one of the platforms listed, have a user/profile age of at least 16.<sup>81</sup>
  - b) Our work on risk factors highlights that children with a user/profile age of 16+ or 18+ may be exposed to new features or functionalities on their social media profile such as direct messaging from strangers, or having the ability to see adult content, thereby potentially exposing them to harm online.<sup>82</sup>

---

<sup>76</sup> Ofcom, 2023. [Online Experiences Tracker](#). Note: Fieldwork was conducted in June-July 2023, so ‘in the last/previous four weeks’ refers to responses in this time period. ‘Harmful content’ as described here covers the Primary Priority Content (PPC) and Priority Content (PC) Net Codes from the Online Experiences Tracker Wave 4. Please see details of the included harms codes in the [Technical Report](#).

<sup>77</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children’s Online Behaviours and Attitudes Survey](#).

<sup>78</sup> The Index is based on responses to a detailed survey of 1,000 children aged 9-15 and their parents, conducted during summer 2022. Source: Internet Matters, 2023. [Children’s Wellbeing in a Digital World: Year Two Index Report 2023](#). [accessed 16 April 2024].

<sup>79</sup> Ofcom, 2023. [Children and Parents media literacy: Parents Survey](#).

<sup>80</sup> YouTube (not YouTube kids), TikTok, Snapchat, Instagram, Facebook, Discord, Pinterest, Twitch, X/Twitter, Vimeo.

<sup>81</sup> Ofcom, 2024. [Children’s Online ‘User Ages’](#)

<sup>82</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

- c) Children are also savvy in using workarounds to access content such as pornographic content.<sup>83</sup>

7.49 Other common online behaviours may put children at greater risk of harm.

- a) Our research into risk factors that may lead children to harm online<sup>84</sup> found that certain design features and functionalities of platforms appeared to exacerbate the risk of harm. These included features which encouraged and enabled children to build large networks of people, often with people they didn't know, and those which exposed children to content and connections which they hadn't selected or proactively sought. Few children were engaging with safety features that might have decreased their risk of harm, either because they didn't believe they would work, or for fear of restricting access to the functions they wanted to use.
- b) Many children play online games which may bring them into contact with strangers, including adults. Over seven in ten (73%) children aged 8-17 game online;<sup>85</sup> 26% play with people they don't know outside the game. Additionally, 23% chat to people through the game who they don't know outside of it.<sup>86</sup> Fifty-three per cent of parents whose 3-17-year-old played games online expressed concern about their child being bullied by other players while gaming.<sup>87</sup>
- c) Almost all children watch videos online, including livestreamed content, which is harder to moderate for harmful content. Ninety-six per cent of 3–17-year-olds watch videos on video-sharing sites and apps, and 63% of 3-17 year-olds watch livestreamed content.<sup>88</sup>
- d) Exposure to potential online harm is more likely to take place when internet users scroll through their feed or 'for you' page, with 34% of internet users aged 13+ encountering their most recent potential harm this way.<sup>89</sup>

7.50 Children want more to be done to protect them from harmful content online.

- a) Many children want quicker and easier resolutions to problems online. When asked about whether they would like sites/apps to take immediate action when solving a breach of rules or safety measures on video-sharing platforms, Ofcom research found that 64% of 13-17s wanted the issue to be resolved immediately.<sup>90</sup>
- b) Many want more information and to be empowered to keep themselves and others safe. UK Safer Internet Centre found that 62% of 8-17s wanted to act and support others, 43% said they wanted to report something or someone online more easily, and 58% said they felt they could help their friends know more about being safe online.

---

<sup>83</sup> 23% of children (11-17 years) reported knowing how to use a potential 'workaround' (e.g. a VPN, file torrenting, the use of Tor). Source: BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 15 April 2024].

<sup>84</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>85</sup> Ofcom, 2023 [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children's Online Behaviours and Attitudes Survey](#).

<sup>86</sup> Ofcom, 2023 [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children's Online Behaviours and Attitudes Survey](#).

<sup>87</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children's Media Literacy Tracker: Parents Survey](#).

<sup>88</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#); Ofcom, 2023. [Children's Online Behaviours and Attitudes Survey](#).

<sup>89</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>90</sup> Ofcom, 2023. [Video Sharing Platforms \(VSP\) Tracker](#).

More than a third (35%) agreed that having more support from the industry about online safety education would make life online more enjoyable and safer for all.<sup>91</sup>

## Harm to children on user-to-user services

---

### Introduction to ‘kinds of harmful content’ sections

- 7.51 This part of the Register presents a detailed analysis of the types of harm that might arise in relation to the different kinds of content harmful to children, and their associated risk factors, on user-to-user (U2U) services. The risk factor analysis is summarised in Risk Profiles; services must take account of the draft Children’s Risk Profiles (see Annex 6: draft Children’s Risk Assessment Guidance) when carrying out their own risk assessments. This Register, and the chapters within this part of it, should be referred to in order to help with these assessments.
- 7.52 This part of the Register assesses the risk from each kind of content harmful to children and is summarised in Table 7.1 above. In each section, we have considered evidence from a variety of sources, including information provided by service providers, academic literature, third-party research, civil society in general and Ofcom’s own research. Further detail on the evidence and methodology used in compiling the draft Children’s Register of Risks is set out above in sub-section ‘Evidence base’.
- 7.53 The evidence base for risk of harm to children on search services is significantly more limited than for U2U services. Risk to children on search services is therefore discussed in a separate section. Introductory and contextual information, such as the kinds of search services considered, is set out in the ‘Introduction’ sub-section of the Search services section of this volume (Section 7.10).
- 7.54 Each harm-specific section is structured as follows:
- a) **Introduction** to the type of harmful content covered, including key considerations.
  - b) **How the harm manifests online.** This includes a summary of how the online environment enables harm to occur, and any common pathways to harm. This will help a service understand the context for the harms and the particular risks a service should be aware of. It includes:
    - i) **Presence.** We present the evidence and analysis relating to the presence of harmful content and the risk of children encountering it.
    - ii) **Impacts.** We present the evidence and analysis relating to the effects of encountering harmful content, including physical, psychological, and behavioural impacts.
  - c) **Evidence of risk factors.** This enables services to develop a better understanding of how specific characteristics relate to, and affect, the risks of harm. The evidence which underlies our analysis is presented for each characteristic:

---

<sup>91</sup> Report showing that young people are keen for parents to be educated about online safety; more than a third of carers are not clear on where to go for support. Source: UK Safer Internet report, 2023. [Young people keen to educate parents on online safety – as more than a third of carers are not clear on where to go for support](#). 7 February 2023. [accessed 15 April 2024].

- iii) **User base.** We consider user base size, and any demographic groups at disproportionate risk of harm for each kind of harmful content (i.e. groups more likely to encounter harmful content, or experiencing disproportionate or distinctive impacts as a result of encountering it).
- iv) **Functionalities and recommender systems.**
- v) **Business models and commercial profiles.**

## U2U services

- 7.55 A U2U service is an internet service by means of which content that is generated directly on the service by a user of the service, or uploaded to or shared on the service by a user of the service, may be encountered by another user, or other users, of the service.
- 7.56 We refer to U2U service types that we expect to be recognisable to both users and businesses, to illustrate how harms can manifest online and how the characteristics of a service can affect the risks of harm to individuals.
- 7.57 The U2U service types below should not be taken to be a definitive view of the services (or parts of services) that may be in scope of the Act. It is for services to assess themselves and seek their own independent advice to enable them to understand and comply with the Act. For more information, please refer to Volume 1 of this consultation.

### Service types

- 7.58 The service types that we have considered in the following chapters appear below. This is not an exhaustive list, nor a classification which sets expectations about a service's risk assessment.
- 7.59 A U2U service may have more than one service type apply to it, with some services potentially including several different service types from those set out below. For example, our evidence indicates that several services have a wide range of features and functionalities, such that they are considered both social media services and video-sharing services.
- a) **Social media services:** Social media services connect users and enable them to build communities around common interests or connections.
  - b) **Video-sharing services:** Video-sharing services allow users to upload and share videos with the public.
  - c) **Pornography services:** Services whose principal purpose is the hosting or dissemination of pornographic content, and who host user-generated pornographic content.<sup>92</sup>
  - d) **Discussion forums and chat room services:** Discussion forums and chat rooms generally allow users to send or post messages that can be read by the public or by an open group of people.
  - e) **Marketplaces and listings services:** Marketplaces and listings services allow users to buy and sell their goods or services.
  - f) **Dating services:** Dating services enable users to find and communicate with romantic or sexual partners.
  - g) **Gaming services:** Gaming services allow users to interact within partially or fully simulated virtual environments.

---

<sup>92</sup> Pornography services with user-generated pornographic content are subject to the risk assessment duties. Pornography that is published or displayed by the provider of the service is subject to different duties under the Online Safety Act and Ofcom has published [draft guidance for providers subject to these duties](#).

- h) **Messaging services:** Messaging services are typically centred around the sending and receiving of messages that can only be viewed or read by a specific recipient or group of people.
- i) **File-storage and file-sharing services:** File-storage and file-sharing services are services whose primary functionalities involve enabling users to store digital content and share access to that content through links.
- j) **Information-sharing services:** Information-sharing services are primarily focused on providing user-generated informational resources to other users.



# 7.1 Pornographic content

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of sexual violence.**

## Summary: risk of harm from pornographic content

Pornographic content is pervasive in the online lives of children. Most children encounter pornographic content online by their mid-teens, with one in ten encountering it before the age of 9. The impact can vary between individuals, but evidence indicates that attitudinal, psychological and behavioural impacts exist. For example, the normalisation of violent sexual behaviours can affect children's attitude to sex and relationships.

### *User base: risk factors*

The average age at which children first encounter pornography is 13, although older children (14-17) are more likely to see it regularly. Across all ages, boys are more likely to encounter pornography than girls.

### *Service type: risk factors*

Children encounter pornographic content primarily on **pornography services** and **social media services**. Due to their role in enabling children to encounter pornographic content, these service types are included in the draft Children's Risk Profiles.<sup>93</sup> To a lesser degree, they encounter it on messaging services as well as discussion forums and chat room services.

### *Functionalities and recommender systems: risk factors*

Several functionalities increase the risk of children encountering pornography. Certain combinations of functionalities, such as hyperlinks and messaging, present a heightened risk.

Pornographic content primarily exists as **posted images and videos**. These can also be encountered either unintentionally or intentionally, while **searching for user-generated content**. Children can also receive pornographic content via **direct messaging** and **group messaging**. Content is shared from other accounts, including peers, a bot accounts,<sup>94</sup> someone known to the child or someone unknown. **User connections** are therefore also relevant, with some children choosing to follow pornographic content actors or seeing pornographic content posted or forwarded by other users in their network. Due to their role in enabling children to encounter pornographic content, posting images and videos, user-generated content searching, direct messaging, group messaging and user connections are included in the draft Children's Risk Profiles.

---

<sup>93</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.

<sup>94</sup> 'Bots' is an umbrella term that refers to a software application or automated tool that has been programmed by a person to carry out a specific or predefined task without any human intervention.

**Content recommender systems**<sup>95</sup> can serve pornographic content to children; in high volumes if they engage with the content, or sometimes without their actively searching for it or seeking it out. Children are also at risk of being served increasingly shocking pornographic content, such as pornographic content depicting themes of violence, by recommender systems designed to maintain engagement. Content recommender systems are included in the Children’s Risk Profiles.

Other functionalities are relevant to children’s encounters with pornographic content. For example, often messages contain **hyperlinks** which could lead to pornographic content or some form of paid-for subscription. Hyperlinks are not just limited to messages but are posted in comments to other posts where children have access.

*Business models: risk factors*

Service providers’ business models risk enabling children to encounter pornography.

**Advertising-based services** can increase the risk of children being recommended pornographic content or being served adverts or ‘pop-ups’ for pornography, which risk directing children to harmful content.

## Introduction

---

- 7.1.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by pornographic content on U2U services (‘risks of harm’). Pornographic content is a category of Primary Priority Content that is harmful to children, and is content of such a nature that it is reasonable to assume that it was produced solely or principally for the purpose of sexual arousal.<sup>96</sup>
- 7.1.2 For the purposes of the Online Safety Act 2003 (‘the Act’), pornographic content that is harmful to children specifically excludes any content which:
- a) consists only of text, or
  - b) consists only of text accompanied by:
    - i) identifying content which consists only of text;
    - ii) other identifying content which is not itself pornographic content;
    - iii) a GIF which is not itself pornographic content;
    - iv) an emoji or other symbol; or
    - v) any combination of content mentioned at (i) to (iv) above.
- 7.1.3 We set out here the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is in the Introduction to the Register (Section 7). ‘Harm’ means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.1.4 In the draft Guidance on Content Harmful to Children within this volume (Section 8.2), we provide guidance on identifying pornographic content, including examples of what Ofcom considers to be, or considers not to be, pornographic content. Examples of pornographic content include explicit photographs; images or videos of real sexual activity; content

---

<sup>95</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

<sup>96</sup> Sections 61(2) and 236(1) of the Online Safety Act 2023.

depicting full frontal nudity or genitals, breasts or buttocks; or fetish material – for which it is reasonable to assume that the content was produced ‘solely or principally’ for the purpose of sexual arousal. See our draft Guidance on Content Harmful to Children (Section 8.2) for more detail.

- 7.1.5 Children encounter a range of types of pornographic content online. Some of this content may be illegal. For example, pornographic content depicting non-consensual sex falls under the Extreme Pornography offence. Images or videos which depict children aged under 18 engaged in sexual acts is child sexual abuse material (CSAM), which is illegal content. This section will assess children’s experience of pornographic content in the round; however, evidence relating to illegal types of pornography and CSAM is addressed in the [Illegal Harms Consultation](#) and will be cross-referenced where necessary. Detailed analysis of the presence and impacts of illegal pornographic content specifically can be found in the Extreme Pornography or CSAM sections of our Illegal Harms Register in our [Illegal Harms Consultation](#).<sup>97</sup>
- 7.1.6 Pornographic content may contain specific themes such as violence, but not meet the threshold for illegality.<sup>98</sup> This section will assess any specific impacts to individuals or society associated with these types of pornographic content. Within the literature, some of these types of content are described as ‘extreme’. To avoid confusing this with illegal Extreme Pornography, we will refer to this content by the problematic themes raised, such as ‘content that contains themes of violence’.
- 7.1.7 Pornographic content can also be published or displayed by the provider of an online service, rather than uploaded by users. Such pornographic content is subject to different duties set out in Part 5 of the Act and is not within the scope of this consultation (which focuses on duties for U2U and search services). Ofcom has published draft Guidance for providers of pornographic content to support services to comply with their duties under Part 5 of the Act.<sup>99</sup> However, from a user perspective, it may not always be easy to distinguish between content that is generated by a user versus content that is published or displayed by the provider of the service. The evidence we refer to in this section also does not generally make this distinction. This section therefore looks at the risk to children from pornographic content, considering user-generated content alongside content published or displayed by providers of the service.
- 7.1.8 In light of the above, some of the evidence in this section may relate to content that is broader than the definition of pornographic content in the Act or set out in the draft Guidance on Content Harmful to Children (Section 8.2). Where such evidence has been included, it is because we think it is relevant to understanding the risk of harm from pornographic content.
- 7.1.9 There are ethical difficulties in conducting research on children’s experience of pornography. This section relies heavily on qualitative data, and the research also often relies on self-reported data. It may be possible that the proportion of children encountering and specifically seeking out pornographic content is higher than reported,

---

<sup>97</sup> Ofcom, 2023, [The causes and impact of online harm](#).

<sup>98</sup> Upton, J., Hazell, A., Abbott, R. and Pilling, K., 2020. [The relationship between pornography use and harmful sexual attitudes and behaviours](#) [accessed 22 February 2024].

<sup>99</sup> Ofcom, 2023, [Guidance for service providers publishing pornographic content](#).

as some children may be unwilling to disclose their activities in response to more intrusive questions. This should be taken into consideration when reviewing the evidence below.<sup>100</sup>

## How pornographic content manifests online

---

- 7.1.10 This sub-section looks at how pornography manifests online and how children may be at risk of harm.
- 7.1.11 Pornographic content can manifest online through posting images or videos on U2U services. Once posted to these services it can be viewed – either intentionally or unintentionally – by other users. Users can also download this content to their own devices or share it on other services. Pornographic content can also be broadcast in real time, through livestreaming.
- 7.1.12 Children provide a range of reasons for seeking out pornography. These include curiosity; sexual education or increasing their knowledge (including getting ideas for their own activities or developing sexual skills and confidence); for masturbation or sexual arousal; to relieve boredom or for a laugh; to break rules or oppose censorship; or to be disgusted.<sup>101</sup> Children can encounter pornography for other reasons: peer pressure has also been cited by children (11-16) as a reason for watching pornography.<sup>102</sup> Another study found that 7% of 14-17-year-olds who had been in a relationship, reported being pressured to watch pornography by a partner.<sup>103</sup>
- 7.1.13 Children’s pathways to pornographic content vary. Pornographic sites, social media and messaging services are a prominent means of access, according to a study with 13-21-year-olds.<sup>104</sup> The metaverse has also been identified as presenting risk of exposure, reported in a study by Internet Matters with parents and children aged 9-16.<sup>105</sup> Children aged 13-19-years-old who participated in focus groups agreed that children are likely to see pornography between the ages of 11 to 12, and that this is determined by the age at which children first have their own device (smartphone, laptop or tablet).<sup>106</sup>
- 7.1.14 Ofcom’s ‘Barriers to Proving Age on Adult Sites’ survey showed that 34% of adults reported having used a VPN (virtual private network) to access pornographic content. Due to ethical concerns, 16-17-year-olds were not asked about accessing pornography directly, but our research found that 60% of them used a VPN to go online, with 7%

---

<sup>100</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 5 March 2024].

<sup>101</sup> Hudson, N., David, M., Haux, T., Kersting, F., MacNaboe, L., McDonough, T., Phillips, N. and Woolfe, E., 2022. [Content and activity that is harmful to children within scope of the Online Safety Bill, a rapid evidence assessment](#). [accessed 21 February 2024].

<sup>102</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 5 March 2024].

<sup>103</sup> Stanley, N., Barter, C., Wood, M., Aghtaie, N., Larkins, C., Lanau, A. and Overlien, C., 2016. [Pornography, Sexual Coercion and Abuse and Sexting in Young People’s Intimate Relationships: A European Study](#). Journal of Interpersonal Violence, 33(19). [accessed 29 February 2024].

<sup>104</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>105</sup> Vibert, S. and Bissoondath, A., 2023. [A Whole New World? Towards a Child-Friendly Metaverse](#). [accessed 20 February 2024].

<sup>106</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

claiming they would always do this.<sup>107</sup> It is therefore reasonable to infer that some 16-17-year-olds would access pornographic content via a VPN. Another study with 11-17-year-olds found that 23% of the children surveyed said they knew how to use a potential workaround like a VPN, while younger children aged 11-13 were less likely to know this (14%).<sup>108</sup>

## Presence

- 7.1.15 The majority of UK children have encountered pornography by their mid-teens. Research finds that nearly half (48%) of 11-16-year-olds have seen online pornography,<sup>109</sup> with 73% of 16-21-year-olds having seen it by the age of 15.<sup>110</sup> In 2019, 63% of children aged 16-17 reported having seen sexually explicit videos or images on a social media platform.<sup>111</sup>
- 7.1.16 A significant proportion encounter pornography at younger ages. Nearly a quarter of respondents aged 16-21 who had seen pornography reported having encountered pornography for the first time by age 11 (27%), and one in ten as young as 9 (10%).<sup>112</sup> Further variations in age and gender will be discussed in the User Base risk factors subsection.
- 7.1.17 Some exposure can be intentional. A study with 11-16-year-olds found that of those who were still seeing online pornography, 47% had actively sought out and found it. When including all children from the study, this equated to 21%.<sup>113</sup> Another study with 11-17-year-olds found that 23% said they sought out pornographic content online intentionally.<sup>114</sup>
- 7.1.18 Other encounters are reported as unintentional; children describe several ways in which such encounters occur. Of the 11-16-year-olds who reported having seen pornography, 32% said that the first time they saw it, it had ‘just popped up’, and 22% said that it had been unexpectedly shown to them by someone else, without having asked for it.<sup>115</sup> In another study, 36% of 9-19-year-olds who use the internet at least once a week, reported coming across a pornographic site when searching for something else.<sup>116</sup> Other reasons

---

<sup>107</sup> Ofcom, 2023. [Barriers to proving age on adult sites](#).

<sup>108</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>109</sup> Martellozzo, E., Monaghan, A., Davidson, J. and Adler, J., 2020. [Researching the Affects that Online Pornography has on U.K. Adolescents Aged 11 to 16](#). SAGE Open, 10(1). [accessed 5 March 2024].

<sup>110</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>111</sup> Thurman, N. and Obster, F., 2021. [The regulation of internet pornography: What a survey of under-18s tells us about the necessity for and potential efficacy of emerging legislative approaches](#). *Policy & Internet* 13 (3). [accessed 15 June 2023].

<sup>112</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 14 June 2023].

<sup>113</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). . [accessed 20 February 2024].

<sup>114</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 23 June 2023]

<sup>115</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). . [accessed 20 February 2024].

<sup>116</sup> Livingstone, S. and Bober, M., 2005. [UK children go online: final report of key project findings](#) [accessed 29 February 2024].

included content being encountered through gaming, misleadingly-named websites, and advertising on illegal streaming sites.<sup>117</sup>

- 7.1.19 Certain types of content are particularly prevalent, and due to their nature, present increased risk of harm to children. For example, pornographic content with themes of violence is particularly present in online spaces, and can be encountered by children. A survey found that nearly eight in ten (79%) 18-21-year-olds who had seen online pornography reported having viewed ‘violent’ pornography including at least one of the following before they were 18; a degrading act, physically aggressive sex or content depicting sexual coercion.<sup>118</sup> This type of content is particularly linked to harmful sexual behaviours and attitudes, presenting disproportionate risk of harm to girls. This will be explored in detail in the ‘Impacts’ and ‘User base’ sub-sections.

## Impacts

- 7.1.20 Pornographic content has impacts both for the children who encounter it, and for wider society, which can in turn affect children. Impacts may include harmful attitudes to sex and relationships or harmful sexual behaviours, as well as psychological outcomes such as low self-esteem and addiction. In this sub-section, we consider the broad impacts of pornographic content on children, as well as the impacts on them of pornographic content depicting themes of violence.
- 7.1.21 Exposure to pornographic content can have emotional impacts on children. Children reported experiencing a range of emotions on first viewing pornographic content. A survey with 11-16-year-olds found that on first viewing pornography, children often reported having felt curious (41%), shocked (27%) and/or confused (24%).<sup>119</sup> Some children reported being so upset that they actively avoided being involved in interactions where this could happen again. In one case, a child decided to take an alternative route to school, avoiding the school bus where they had been shown pornography on a mobile phone by a group of peers.<sup>120</sup>
- 7.1.22 Evidence also indicates that watching pornographic content can affect children’s self-esteem, specifically in relation to body image. A study found that of the young adults (18-21-year-olds) who reported having previously watched online pornography, those who reported first watching it at age 11 or younger were significantly more likely to score lower on self-esteem than those who reported having first watched it at age 12 or older.<sup>121</sup> And a majority of 16-21-year-olds agree with the statement that “*viewing online pornography affects children and young people’s body image*”. In qualitative responses in the same study, female respondents expressed the belief that pornography plays a role in

---

<sup>117</sup> Livingstone, S., Davidson, J., Bryce, J. and Batool, S., 2017. [Children’s online activities, risks and safety](#). [accessed 20 February 2024].

<sup>118</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>119</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 5 March 2024].

<sup>120</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>121</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].



fuelling body insecurity and anxiety, while male respondents felt that pornographic content informed unrealistic and unobtainable body ideals.<sup>122</sup>

- 7.1.23 Considering pornographic content with themes of violence specifically, evidence suggests that this type of content presents heightened or distinctive risks. Emotional impacts on children are likely to be particularly severe. In interviews, boys and girls (16-18) reported feeling upset or disturbed, particularly after watching this type of pornographic content.<sup>123</sup> In another study, boys reported distress when they had seen pornographic content recommended by a platform which was more shocking or more violent than anticipated. They described feeling guilty and ashamed, and concerned that the content would cause long-lasting damage.<sup>124</sup>
- 7.1.24 Evidence indicates that watching pornographic content can also affect children's attitudes towards sexual and romantic relationships. Young people (16-18) report that watching pornography can create unrealistic expectations of sex.<sup>125</sup>
- 7.1.25 Pornographic content has been linked to the normalisation of sexual aggression and harmful sexual behaviours, often towards girls.<sup>126</sup> Harmful sexual behaviour is defined as a spectrum of sexual behaviours exhibited by children, which are sexually harmful to others. This ranges from inappropriate, to problematic, abusive and violent behaviours, and often differs based on developmental stage.<sup>127</sup> It is understood that there are several drivers of harmful sexual behaviour,<sup>128</sup> equally, it is important to take into account wider individual, social, and developmental factors when categorising harmful sexual behaviour. Evidence suggests that exposure to pornography may be one of several risk factors for harmful sexual behaviour among children.
- 7.1.26 There are several longitudinal studies that discuss the relationship between harmful sexual behaviour and pornographic content. Evidence from the Children's Commissioner indicates that an expectation that sex involves physical aggression is common among 16-21-year-olds. Moreover, respondents were more likely to state that girls enjoy physically aggressive sex acts (42%) than to state that boys do (37%). Sexual aggression can be linked explicitly to the frequency and nature of pornographic content viewed. The 16-21-year-olds in the study who were frequently exposed to pornography (self-assessed at twice or more per week) were significantly more likely to have been involved in a physically aggressive or degrading sex act, before or since turning 18, either as the recipient or actor.<sup>129</sup>

---

<sup>122</sup> Children's Commissioner, 2023. ['A lot of it is actually just abuse' Young people and pornography](#). [accessed 20 February 2024].

<sup>123</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>124</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>125</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 23 June 2023].

<sup>126</sup> 'A lot of online pornography can be unrealistic and some of it is rape content, so young people may think this is okay and realistic. When in reality it is not acceptable, it teaches incorrect and disgusting behaviours' – Girl, 18, survey, first saw pornography at age 12. Source: Children's Commissioner, 2023. ['A lot of it is actually just abuse' Young people and pornography](#). [accessed 20 February 2024].

<sup>127</sup> Hackett, S., 2014. [Children and young people with harmful sexual behaviours](#). [accessed 26 March 2024].

<sup>128</sup> Children's Commissioner, 2023. [Evidence on pornography's influence on harmful sexual behaviour among children](#). [accessed 20 February 2024].

<sup>129</sup> Children's Commissioner, 2023. ['A lot of it is actually just abuse' Young people and pornography](#). [accessed 20 February 2024].



- 7.1.27 There is also evidence to suggest that watching pornographic content affects children's attitudes on consent. Interviews with 16-18-year-olds revealed that pornographic content had made their partners less likely to speak about sexual consent, as it is implied (not explicitly discussed) in pornographic content.<sup>130</sup> Evidence suggests that those intentionally seeking pornography may be less likely to seek explicit sexual consent in some situations: a survey of 11-17-year-olds within the same report also found that, of those who reported that most of the pornography they had seen was intentional, 29% said that sexual consent wasn't needed when "*you knew the person really fancies you*". In contrast, of those who said that the pornography they had seen was mostly accidental, only 5% believed the same.<sup>131</sup>
- 7.1.28 Pornographic content with themes of violence can also affect children's attitudes towards sex and relationships in specific ways. An adult participant in an Ofcom study described how watching increasingly shocking or violent pornographic content from the age of 12 resulted in him struggling to form a solid romantic relationship, and led him to believe that everybody found pleasure in violence and pain during sex.<sup>132</sup> Viewing pornographic content, in particular with themes of violence, can therefore be linked to increased risks of developing harmful sexual behaviours that could cause indirect physical and psychological harm towards future sexual partners. Available evidence suggests that these indirect harms are disproportionately likely to affect women and girls. This is discussed in detail in the 'User Base: Gender' sub-section. However, harmful sexual behaviours are likely to affect other groups, such as LGBTQ+ children.
- 7.1.29 Watching high volumes of pornography carries the risk of children developing an addiction to watching pornographic content. In interviews, some boys reported feeling concerned about becoming addicted to pornography,<sup>133</sup> while a survey by Dignify reported that 10% of 14-18-year-olds who said they had viewed pornography on multiple occasions reported that they were addicted to it.<sup>134</sup>

---

<sup>130</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>131</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>132</sup> Ahmed (31-35 years old, London) started watching pornography when he was 12 years old. He started by mainly looking at images online, this progressed into watching what he described as "*fairly normal pornographic content*." By 17, Ahmed said he grew bored of the content he was watching. He started watching violent, hardcore porn, and continued to do so for ten years. Ahmed reflected on the experience and believed that watching pornographic content in that way long-term had shaped his view on relationships. He claimed he misunderstood the meaning of relationships, seeing them only as a pursuit of pleasure and sex which explained his inability to form a solid romantic relationship. He also said the pornographic content he watched led him to believe that everybody found pleasure in violence and pain during sex. Although Ahmed continued engaging with increasingly violent pornographic content into adulthood, the gateway into hardcore pornographic content arose in his youth and shaped the content he sought to consume in the following years. Source: Ofcom and Revealing Reality, 2022. [How People are Harmed Online](#).

<sup>133</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>134</sup> As cited in The Guardian. Source: Grant, H. and Milmo, D., 2023. [A fifth of teenagers watch pornography frequently and some are addicted, UK study finds](#). 10 March 2023. [accessed 20 February 2024].

## Evidence of risk factors on user-to-user services

---

- 7.1.30 We consider that the following risk factors are likely to increase the risks of harm to children relating to pornographic content. This is also summarised in the grey box at the start of the section.

### Risk factors: User base

#### User base size

- 7.1.31 There is no evidence to indicate that user base size is a specific risk factor for children encountering pornographic content. However, we expect the number of users on a service could play a role in a similar manner to that presented in the ‘Context to understand risk dynamics’ part of the Wider context to understanding risk factors section in this volume (Section 7.14).

#### User demographics

- 7.1.32 The following sub-section outlines important evidence on user base demographic factors and risks of harm, which can include protected characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.
- 7.1.33 The data suggests that user base characteristics including age, gender, sexuality and gender identity could lead to an increased risk of harm to children from pornographic content. This increased risk of harm may be an increased risk of encountering pornographic content, increased risk of encountering specific types of pornographic content, encountering it through specific pathways, or disproportionate impacts from encountering this content.

#### Age

- 7.1.34 The most recent evidence suggests that although some children are exposed to pornographic content at an early age, the risk of such exposure increases with age. In a survey with 16-21-year-olds who had seen pornography, 10% reported having first seen pornographic content by age 9, 27% by 11 and 50% by age 13.<sup>135</sup> Other slightly older studies also find that rates of exposure increase with age. A study with 11-17-year-olds found that 51% of 11-13-year-olds, 66% of 14-15-year-olds and 79% of 16-17-year-olds had seen pornography.<sup>136</sup> In another study, 65% of 15-16-year-olds reported having seen online pornography in the past 12 months, compared to 46% of 13-14-year-olds and 28% of 11-12-year-olds.<sup>137</sup>
- 7.1.35 The evidence also suggests that younger children are more at risk of unintentional exposure, and of experiencing negative emotional impacts from viewing pornographic content. Younger children (aged 11-13) were more likely to say they had viewed the content unintentionally (62%, vs 53% for 14-15-year-olds and 46% of 16-17-year-olds) and were more likely to describe ‘feeling grossed-out and confused’, especially those who had

---

<sup>135</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>136</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>137</sup> Martellozzo, E., Monaghan, A., Davidson, J. and Adler, J., 2020. [Researching the Affects that Online Pornography has on U.K. Adolescents Aged 11 to 16](#). SAGE Open, 10(1). [accessed 5 March 2024].

seen it when they were aged 10 or under<sup>138</sup> and found the content ‘shocking and disturbing’.<sup>139</sup>

## Gender

- 7.1.36 Evidence suggests that boys are more likely to seek out porn intentionally, with girls at higher risk of unintentional encounters. Girls are more likely to experience harmful emotional outcomes, as well as be impacted by harmful sexual behaviours associated with their sexual partners watching pornographic content.
- 7.1.37 Boys are disproportionately likely to seek out and regularly watch pornographic content. In a study with 11-18-year-olds, boys were found to be significantly more likely than girls to have intentionally viewed pornographic content at least once in the two weeks before the survey (34% vs 17%). Twenty-one per cent of boys had intentionally viewed pornography every day, or more often, in the two weeks before the survey, compared to just 7% of girls.<sup>140</sup> Another survey with 11-16-year-olds found that 56% of boys reported having seen pornographic content, compared to 40% of girls, and were more likely to report having ever actively searched for it (59% vs 25% of those who answered the question).<sup>141</sup>
- 7.1.38 Girls may also be at higher risk of unintentional exposure to pornographic content, particularly through being sent unwanted images. Seventy-three per cent of female respondents aged 13-21 reported in a survey that they had received unwanted sexual photos.<sup>142</sup> While some of this content may be pornographic content, receiving unwanted sexual content may amount to intimate image abuse or cyberflashing (see our [Illegal Harms Register](#)).
- 7.1.39 Boys were more at risk of pornographic content affecting their attitudes and behaviours around sex, and they were more likely than girls to agree that pornographic content is realistic (53% vs 39%).<sup>143</sup> Another study among 16-17-year-olds found that boys were more likely than girls to agree that “sex in porn is very similar to what sex is like in real life” (20% vs 4%).<sup>144</sup>
- 7.1.40 This belief that pornography is realistic, especially when combined with the presence of pornographic content containing themes of violence (see ‘Presence’ sub-section), presents the risk that children watching pornographic content develop harmful attitudes towards gendered norms and behaviours during sex. A study involving interviews with 16-18-year-olds found some participants saw sex as orientated towards male pleasure, as a

---

<sup>138</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>139</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>140</sup> Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’ Young people and pornography](#). [accessed 20 February 2024].

<sup>141</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 20 February 2024].

<sup>142</sup> Girlguiding, 2023. [Girls’ Attitude Survey 2023](#). [accessed 20 February 2024].

<sup>143</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 20 February 2024].

<sup>144</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

result of watching pornographic content.<sup>145</sup> In another study, 16-21-year-olds expressed concern about the implications of pornography in distorting their understanding of the difference between sexual pleasure and harm, particularly for women.<sup>146</sup> These attitudes present a risk of physical and psychological harm to girls in particular, by informing offline violence against women and attitudes towards consent (see 'Impacts' sub-section). Young women (aged 16-21) reflected on the pressure pornography creates to perform acts which boys may have seen in pornography, including aggressive, degrading and pain-inducing sex acts.<sup>147</sup>

### *Sexuality and gender identity*

- 7.1.41 LGBTQ+ children may be at increased risk of pornographic content affecting their attitude to sex and relationships. In a study with 11-18-year-olds, across all children who had seen pornography, 41% said they had learnt about sex from watching it. This was higher for LGB children (61% of those who had seen it learnt about sex from it) than those identifying as heterosexual (41%).<sup>148</sup> LGBTQ+ children may have seen less representation in the media of diverse sexual relationships, and lack relevant sex education, so use pornographic content as a source of information for their own sexual relationships.<sup>149</sup>

## **Risk factors: Service types**

- 7.1.42 Children can encounter pornographic content on any service which allows the sharing of images or videos and can be accessed or used by children. However, research suggests that pornographic content is particularly encountered on social media services and pornography services.

### *Social media services*

- 7.1.43 Social media services are a common source of pornographic content. While some social media services state they ban pornographic content on their platform,<sup>150</sup> evidence suggests that this kind of content is still present on social media. Sixty-three per cent of 16-17-year-olds reported having been exposed at least once to sexually explicit pornographic videos or pictures via social media services.<sup>151</sup> A report by the Children's

---

<sup>145</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>146</sup> 'For example, a younger individual who is not fully developed could find pornography that reinforces abusing women and they might begin to think that is what women find pleasurable. Source: Children's Commissioner, 2023. ['A lot of it is actually just abuse' Young people and pornography](#). [accessed 20 February 2024].

<sup>147</sup> "It makes boys think they can do everything they see in porn in real life. Some things like anal are everywhere in porn but most girls don't want to do that. Boys just think it's normal and expect us all to do it and it puts pressure on us". Source: Children's Commissioner, 2023. ['A lot of it is actually just abuse' Young people and pornography](#). [accessed 20 February 2024].

<sup>148</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>149</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>150</sup> Not all services use the term 'pornographic content' in their Terms of Service. However, if not using this exact terminology, many state that they ban forms of sexually explicit content.

<sup>151</sup> Thurman, N., and Obster, F., 2021. [The regulation of internet pornography: What a survey of under-18s tells us about the necessity for and potential efficacy of emerging legislative approaches](#). Policy and Internet, 13(3), 415-432. [accessed 20 February 2024].

Commissioner found that 6%-8% of children aged 13-17 had been exposed to pornography on social media services which prohibited such content.<sup>152</sup>

- 7.1.44 Social media services may have functionalities that can direct children to pornographic content on other service types, such as hyperlinks, bots, advertising, or posted content containing information that leads children to seek pornographic content elsewhere.<sup>153</sup> Risks associated with specific functionalities will be explored in the relevant ‘Functionalities’ sub-section.

#### *Pornography services*

- 7.1.45 Children often encounter pornographic content on pornography services. A survey with 16-18-year-olds showed that 47% of the sample who had seen pornography had seen it on a pornographic service.<sup>154</sup>
- 7.1.46 Several functionalities of pornography services pose a particular risk. The functionality of searching for content is particularly used to access pornographic content (see ‘User-generated content searching’ in the ‘Functionalities’ sub-section). Content recommender systems on pornographic services similarly can direct children towards pornographic content, including pornographic content with themes of violence (see ‘Impacts’ and ‘Recommender Systems’ sub-sections).
- 7.1.47 Emerging evidence also suggests an increase in the availability of AI-generated pornography online, in particular on some pornography services. DeepTrace found that 96% of deepfake videos online were pornographic content and were often accessed through specific deepfake pornographic websites or mainstream adult sites.<sup>155</sup> Deepfakes which depict children engaged in, or appearing to be engaged in sexual activity constitutes CSAM, which is an illegal offence. This includes photographic, pseudo-photographic and prohibited imagery (see CSAM sections in our [Illegal Harms Register](#)). Deepfakes which involve identifiable adults could be intimate image abuse (see relevant sections in the [Illegal Harms Register](#)). However, pornographic content with synthetic subjects is legal and could be encountered by children, given their access to pornography services.

#### *Discussion forums and chat rooms, and messaging services*

- 7.1.48 Our evidence suggests that children can encounter pornography on discussion forums and chat rooms, as well as messaging services. This can be in the form of shared links to pornographic content, as well as the sharing of content itself. Children report being sent

---

<sup>152</sup> Children’s Commissioner, 2022. [Digital childhoods: a survey of children and parents](#). [accessed 3 April 2024]

<sup>153</sup> Ethan (10 years old) ended up coming across pornographic content after searching for a term [the name of a lesser-known pornographic site] after seeing a video on a social media platform about it. The post read “don’t ever search [name of pornographic site] up” that enticed Ethan to see what it was. “I saw this [video], and it said, ‘Don’t ever search this up’. I searched it up [using a search engine] as I thought it was just going to be a little scary thing or whatever... They were right [I shouldn’t have searched the term].” Source: Ofcom, 2022. [Risk factors that may lead children to harm online](#).

<sup>154</sup> Thurman, N., and Obster, F., 2021. [The regulation of internet pornography: What a survey of under-18s tells us about the necessity for and potential efficacy of emerging legislative approaches](#). Policy and Internet, 13(3), 415-432. [accessed 20 February 2024].

<sup>155</sup> Note: Data was collected between 1 – 31 June 2019. Source: DeepTrace, 2019. [The state of deepfakes - Landscape, threats and impact](#). [accessed 20 February 2024].

unsolicited images or links on messaging services and chat rooms.<sup>156</sup> Functionalities that are typically central to messaging services are direct messaging (see ‘Direct Messaging’) and group messaging (see ‘Group Messaging’).

## Risk factors: Functionalities and recommender systems

### User identification

#### *Fake and anonymous user profiles*

- 7.1.49 The evidence suggests that children may be exposed to pornographic content through fake or anonymous profiles. In a study commissioned by DCMS, children reported receiving messages from bot accounts including pornographic images. This can be combined with fraud attempts, such as profiles requesting money with the promise of sending further pornographic content.<sup>157</sup>

### User networking

#### *User connections*

- 7.1.50 Children report being sent pornographic content by other users, with whom they may be connected, but do not know personally. In our *Children’s Media Lives* report, a child (aged 14) described being sent sexually explicit content from a user she did not know, who had been added through a feature on a social media service which allowed users to add new connections with a single click, including users not previously known to them. She once received sexually explicit content during one of these interactions which started on one social media service and moved to another, using this same feature.<sup>158</sup> Another study reported a child (aged 14) accepting friend requests from people he did not know, before receiving “short porn videos with invitations to click through for more”.<sup>159</sup>
- 7.1.51 In some cases, being sent pornographic content by other users can occur in the context of illegal harms, such as grooming or cyberflashing (see the [Illegal Harms Register](#)). In another study, a child (aged 14) similarly described being sent short pornographic content videos, and invitations to click through, by people he did not know and who had added him on a U2U service. Sometimes the sharing of pornographic content was combined with attempts to groom children for the purpose of sexual abuse. This includes trying to incite or coerce children to send self-generated indecent imagery, which constitutes child

---

<sup>156</sup> Hovarth, M.A., Alys, L., Massey, K., Pina, A., Scally, M. and Adler, J.R., 2014. [Basically... Porn is Everywhere: A Rapid Evidence Assessment](#). [accessed 20 February 2024].

<sup>157</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 23 June 2023]. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>158</sup> Ofcom, 2023. [Children’s Media Lives 2023](#).

<sup>159</sup> Note: The study was with 13 ‘vulnerable’ children, which here means children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social media](#). [accessed 20 February 2024].



sexual abuse material and is illegal content.<sup>160</sup> More information on grooming and illegal harm can be found in the Grooming and CSAM sections of the [Illegal Harms Register](#).<sup>161</sup>

- 7.1.52 Evidence suggests that some children may encounter pornographic content by following dedicated accounts for accessing such content. These dedicated accounts can take different forms. Some respondents in one study, for example, reported having followed accounts that posted anonymous, homemade, point-of-view ('POV') pornography.<sup>162</sup> Some accounts advertise pornographic services. Subscribing to these accounts can lead children to encounter pornographic content, even without signing up to or paying for dedicated services. A study by Revealing Reality reported that some children (aged 11-18) followed accounts on social media that had added 'Premium' to their name, which children said would indicate they were advertising pornographic services. Individuals could then transfer money to the person who owned the 'Premium' account, and in turn they could gain access to the videos and photos of the account owner performing sexual acts. Many accounts posted links and 'teaser' trailers for video subscription services, so that any child connected to these accounts would encounter pornographic content. One example included a boy aged 16 who at the time of the interview had received a lot of follow requests from 'Premium' accounts, some of which he followed to see posted photos advertising their services. These were also often sexually explicit, but he did not pay for the services.<sup>163</sup>

#### *User groups*

- 7.1.53 Pornographic content can also be shared in user groups. In a study by Revealing Reality, a child (aged 16), referred to a community of social media users, within which pornographic content was sometimes posted and shared, and where photos and videos were available without any restrictions beyond a warning that the media 'may contain graphic imagery'.<sup>164</sup>

#### *User tagging*

- 7.1.54 Child users may be directly tagged in posts that include pornographic content. For example, a child reported that: "*on [a social media service] people's accounts get hacked and then the hackers post pornographic videos and tag my friends in them, and it pops up on my news feed*" (Male, 11-12).<sup>165</sup>

---

<sup>160</sup> Ali (14) said "*They send photos, the under areas and upper areas and some of them send a male and a female having intercourse. And inappropriate things like 'Come and meet me,' or something. When I get it I just block them straight away.*" Note: The study was with 13 'vulnerable' children, which here means children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social media](#). [accessed 20 February 2024].

<sup>161</sup> See our [Illegal Harms Register](#).

<sup>162</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>163</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>164</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>165</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levy, R. and Hovarth, M.A.H., 2017. ['I wasn't sure it was normal to watch it'](#). [accessed 20 February 2024].



## User communications

### Direct messaging

- 7.1.55 Several studies have reported on children’s exposure to pornographic content through direct messaging. Interviews and a survey with children aged 11-18 revealed that specific social media services allow pornographic content to be posted by pornographic content actors and sent between individual users via direct messaging.<sup>166</sup> This content can be shared by peers, or by other users unknown to the child. Another study similarly reported on children being unknowingly sent links to pornography through messages from peers, showing how direct messaging and hyperlinks combine to present a risk of children encountering pornographic content.<sup>167</sup>
- 7.1.56 Functionalities that enable users to easily connect to children, combined with direct messaging functionalities, present a particular risk of children being exposed to pornographic content. In a project with 12-18-year-olds using avatars created for the research, all ten avatars were directly messaged by accounts after accepting a connection request from them. Some of these accounts promoted paid-for content to the avatar accounts, the male accounts in particular.<sup>168</sup>
- 7.1.57 The risks discussed above also apply to exposure to bots that message pornographic content to child users online. One boy (17) reported that pornographic content is “*literally everywhere. All over social media. You get loads of sex-bots all the time literally messaging you on every public page. It’s just everywhere.*”<sup>169</sup> The use of ‘bots’ in distributing pornographic content to children via direct messaging is reported in another study using avatars to understand potential risks facing child profiles. An avatar account based on a 16-year-old regularly received messages from ‘bot’ pornographic content accounts.<sup>170</sup>

### Group messaging

- 7.1.58 Ofcom research finds that children tend to be in multiple, large group chats, often including people they do not know personally.<sup>171</sup> Children report being sent links to pornography from peers and strangers through group chats.<sup>172</sup> Group chats may therefore present increased risk to children as they enable pornographic content to be shared more widely.<sup>173</sup> A child (aged 11) described being in a group chat with other people in her year group across her local area, many of whom she had not met face-to-face. In the chat, she once saw a leaked video of a boy she knew performing a sexual act,

---

<sup>166</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>167</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>168</sup> Note: The research involved setting up a series of avatars, which were profiles set up on social media apps that mimicked the online profiles of real children who took part in the interviews for this project. The age of the real child was used to register the profile and displayed in the bio of the user account. Source: 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 20 February 2024].

<sup>169</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>170</sup> 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 23 June 2023].

<sup>171</sup> Ofcom, 2023. [Children’s Media Lives 2023](#).

<sup>172</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>173</sup> Revealing Reality, 2023. [Anti-social media](#). [accessed 20 February 2024].

but she chose not to leave the group as she wanted to carry on seeing some of the other content and conversations in it.<sup>174</sup> A young person (aged 18) described being in a group chat on a messaging service for his local football team which he joined when he was 17. He mentioned that pornographic videos were shared on these chats.<sup>175</sup>

- 7.1.59 Being added to group chats<sup>176</sup> can also direct children to links to pornographic content. In the avatar study described above, all four boy avatars and two girl avatars were added to group chats by people they did not know, in which there were multiple other strangers with links to paid-for pornographic content services or pornographic dating services.<sup>177</sup>

#### *Commenting on content*

- 7.1.60 Children (aged 9-18) reported seeing links to pornography shared in comments by fake ‘bot’ accounts.<sup>178</sup> A child (aged 13), in an Ofcom study on online harms to children, explained that a particular video on a social media service, posted by one of her favourite content creators, had more comments than usual, which captured her interest and encouraged her to find out what everyone was talking about. Reading through the comments, she was then directed off-platform and exposed to pornography on another social media platform.<sup>179</sup>

#### *Posting content*

- 7.1.61 The ability to post pornographic content, particularly images and videos, increases the risk that children will encounter it. Evidence suggests that pornographic content is posted and subsequently encountered in a number of contexts; for example, within user groups or communities (see ‘User groups’ and ‘User tagging’ sub-sections).<sup>180</sup>
- 7.1.62 The functionalities of ‘User connections’ and ‘Posting content’ in particular combine to lead children to encounter pornographic content. Children report encountering pornographic content posted by their connections – often leading to unintentional encounters. Interviews with 13 vulnerable children (aged 14-17) revealed that all the children in the study were seeing violent and sexual content posted by their connections via ephemeral ‘Stories’ functions.<sup>181</sup>
- 7.1.63 As explored in the ‘User connections’ sub-section, children may also encounter pornographic content by following dedicated accounts. Once children are connected to these accounts, they can be exposed to content posted by pornographic content creators,

---

<sup>174</sup> Ofcom, 2023. [Children’s Media Lives 2023](#).

<sup>175</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>176</sup> A definition of group chats is provided in the Glossary.

<sup>177</sup> 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 20 February 2024].

<sup>178</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>179</sup> Ofcom, 2022. [Risk factors that may lead children to harm online](#).

<sup>180</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>181</sup> The study refers to ‘vulnerable’ children i.e., children who when compared with national data, all lived in neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Source: Revealing Reality, 2023. [Anti-social media](#). [accessed 20 February 2024].

as well as accounts advertising pornographic services or montages of pornographic content.<sup>182</sup>

### *Re-posting and forwarding content*

- 7.1.64 Some pornographic content is encountered as content re-shared by other users. This can lead to accidental encounters with pornographic content by children. In a study with 11-16-year-olds, one child spoke about how coming across re-shared pornographic content made her feel. *“Often when on [social media], someone would have re-blogged a post, or a post leading to recommendations of pornographic gifs. Normally, these take me by surprise and make me feel quite uncomfortable”* (Girl aged 13-15).<sup>183</sup>

## Content exploring

### *Content tagging*

- 7.1.65 Research conducted using avatars representing 12-18-year-olds found that when scrolling for content, hashtags are a common way of coming across sexual content, and profiles associated with sexual content, on social media.<sup>184</sup> In a study with 11-16-year-olds, a girl aged 13-14 described how on *“popular hashtags on [social media site], which younger children can access, there are some explicit pictures. Makes me feel irritated that people can come across these when they don't want to...”*<sup>185</sup>

### *Hyperlinking*

- 7.1.66 Hyperlinks, especially in combination with other functionalities, present a risk of children encountering pornographic content. Several studies report children being sent hyperlinks by direct messaging. A study with 16-18-year-olds reported participants receiving links to videos on pornographic sites from friends, without knowing what the content would include.<sup>186</sup> In the avatar study described earlier, an avatar representing a 14-year-old received three separate direct messages linking to websites that offered paid-for pornographic content within a single day. Within two days, all four boy avatars had received messages with links to paid-for porn.<sup>187</sup> Hyperlinks can also be shared in messages from ‘bot’ accounts<sup>188</sup> and within comment sections on posted content.<sup>189</sup> See also ‘Direct messaging’ and ‘Commenting on content’ sub-sections.

---

<sup>182</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>183</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 20 February 2024].

<sup>184</sup> Note: The research involved setting up a series of avatars, which were profiles set up on social media apps that mimicked the online profiles of real children who took part in the interviews for this project. The age of the real child was used to register the profile and displayed in the bio of the user account. Source: 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 20 February 2024].

<sup>185</sup> Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Levya, R. and Hovarth, M.A.H., 2017. [‘I wasn’t sure it was normal to watch it’](#). [accessed 20 February 2024].

<sup>186</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>187</sup> 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 20 February 2024].

<sup>188</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>189</sup> Ofcom, 2022. [Risk factors that may lead children to harm online](#).

### *User-generated content searching*

- 7.1.67 Children may also be at risk of being exposed to pornography through the ability to search for content on U2U services. In one study, 36% of 9-19-year-olds who use the internet at least once a week, reported coming across a pornographic site when searching for something else.<sup>190</sup>
- 7.1.68 Evidence also shows children are actively searching for pornographic content on dedicated sites. A study with 11-17-year-olds revealed that of the respondents who had accessed pornography intentionally, 43% used a pornographic site to do so. Interviews with 16-18-year-olds from the same study revealed some respondents would actively search for a preferred category or particular pornographic actor, while others browsed the homepage.<sup>191</sup>

## Recommender systems

### *Content recommender systems*

- 7.1.69 Services which deploy content recommender systems<sup>192</sup> could be at higher risk of suggesting pornography content to children. A detailed explanation of how recommender systems work and how they can pose a risk to children is set out in our Wider context to understanding risk factors section later in this volume (Section 7.14).
- 7.1.70 Avatar studies<sup>193</sup> suggest that child accounts can be served 'sexual content'<sup>194</sup> by recommender systems. While not exactly aligning to our definitions of pornographic content, these studies suggest that sexual content may include some pornographic content that is available on sites which prohibit it. This content can also be recommended to child accounts. These studies found that despite being registered to a social media site as the age of a child, and being targeted with child focused, age-appropriate advertising, boy and girl avatars were served sexual content without seeking it. For example, one avatar, representing a child aged 14, was recommended sexual content alongside adverts for Roblox<sup>195</sup> and a school revision study app. Another avatar, representing a child aged 15, was served sexual content alongside adverts for T-levels<sup>196</sup> and a Home Office campaign for recognising and reporting child abuse online.<sup>197</sup>
- 7.1.71 Other research reports children being recommended pornographic content on their content feeds. In a study by Revealing Reality, an 18-year-old girl described how, when she was 16/17, she had seen lots of 'trick' videos on her newsfeed where the video would

---

<sup>190</sup> Livingstone, S. and Bober, M., 2005. [UK children go online: final report of key project findings](#) [accessed 29 February 2024].

<sup>191</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>192</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user's normal engagement pattern.

<sup>193</sup> The research included Avatar methodology where the researchers had created child accounts based on children they had interviewed. The researcher themselves used these accounts to measure how the design of the sites/apps they explored put children at risk.

<sup>194</sup> 'Sexual content' may include some pornographic content, as well as sexualised images or videos.

<sup>195</sup> Roblox is an online gaming platform marketed mainly to children. The platform allows users to program and play games with other users.

<sup>196</sup> T Levels are two-year courses which are taken after GCSEs and are broadly equivalent to three A levels.

<sup>197</sup> 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk](#). [accessed 20 February 2024].

start out as non-pornographic content and then turn into pornographic content.<sup>198</sup> The study also reported a young adult (aged 18), who saw bondage and sex-machine pornography in the ‘Explore’ page of her social media account, which she described as ‘strange’.<sup>199</sup> Although this respondent was an adult, the study demonstrates that pornographic content is available and being recommended on services that prohibit it.

- 7.1.72 Content recommender systems’ functionality can have the effect that if children engage with pornographic content, they risk being recommended an increasing volume of harmful content. There is evidence to suggest that following first engagement, some children are recommended increasingly shocking pornographic content, such as pornographic content depicting violent themes. For example, in interviews and focus groups with participants aged between 9 and 18, one participant explained that after accessing a video on a pornography website, the site recommended further, more ‘extreme’ content to them, which caused them significant distress, beyond what they would have experienced if they had just seen the video they had intended to.<sup>200</sup> Some children report that having accidentally encountered this type of pornographic content, they then went on to seek it out intentionally, having become curious about it.<sup>201</sup> When harmful content is repeatedly encountered by a child, this may lead the child to experience ‘cumulative harm’.<sup>202</sup>

## Risk factors: Business model and commercial profile

### Revenue models

#### *Advertising-based model*

- 7.1.73 One report suggests that some services are incentivised to enable the posting by users of pornographic videos or images, with low levels of moderation, and to recommend such content to users, including children, due to their advertising revenue model.<sup>203</sup> Services relying on advertising revenue models generate revenue in proportion to their user base and user engagement, and this reduces their incentives to detect and moderate pornographic content, if it is engaging. High engagement attracts advertisers, which in turn increases revenue. This suggests that the advertising revenue model may increase the risk that children encounter pornographic content on these services. Further analysis

---

<sup>198</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>199</sup> It is worth noting that some of these reports of pornography on social media platforms dated from eight years ago and many hadn’t seen pornography on these services in recent years. Source: BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>200</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 20 February 2024].

<sup>201</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 23 June 2023].

<sup>202</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Children’s Register of Risk (section 7).

<sup>203</sup> The report by campaign organisation Cease argues porn sites are “incentivised to make access as easy as possible (including for children) to keep the process of uploading video content friction-free and to minimise moderation”, referencing Hanson, E., 2021. [Pornography and human futures](#). Fully Human. [accessed 10 April 2024]. Source: CEASE, 2021. [Expose Big Porn](#). [accessed 20 February 2024].

on the risk posed by service providers' business models can be found in the Risk to children from business models and commercial profiles section (Section 7.12).

7.1.74 Advertising revenue models can also present a risk to children due to users' and adult entertainment services' ability to promote pornographic content on services that rely on such revenue models. A study with 11-18-year-olds found that adverts or pop-ups for pornographic content appeared on film streaming, sports streaming and gaming services. In the Revealing Reality study, an 18-year-old girl reported that she first saw pornography accidentally in a pop-up on a video streaming site, when she was 14.<sup>204</sup> Although these adverts are likely to be 'paid-for' advertising rather than user-generated content, there is a risk that they will direct children to pornographic user-generated content on the service. In the example cited above, the participant who first saw pornography accidentally in a pop-up on a video streaming site, at age 14, explained that she didn't search for it at the time, but after talking to her cousin about pornography when she was 15, she looked it up herself.<sup>205</sup>

---

<sup>204</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

<sup>205</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 20 February 2024].

## 7.2 Suicide and self-harm content

**Warning: this section contains references to content that may be upsetting or distressing, including detailed discussion and descriptions of suicide and self-harm and examples of suicide and self-harm content.**

### Summary: risk of harm from suicide and self-harm content

A wide range of suicide and self-harm content exists online. In this section, we consider content which encourages, promotes, or provides instructions for suicide or an act of deliberate self-injury, and which is harmful to children ('suicide and self-harm content').

Evidence suggests that harmful suicide and self-harm content can manifest online in various forms, ranging from recovery content that could benefit some users but be harmful to others depending on the context and individual, and more explicit content that actively promotes or glorifies these behaviours.

The negative physical and psychological impacts of this type of content are well documented. In the most severe cases, exposure to this content may contribute to long-term mental health concerns, eating disorders, physical harm and death. Other negative emotional impacts can include children feeling upset, confused, or frustrated following exposure to this type of content.

#### *User base risk factors:*

User demographics can play a significant role in the risk of harm from content that promotes, encourages or provides instruction for suicide and self-harm.

Specifically, those with existing mental health challenges may be more likely to engage with this content; there is evidence that it may exacerbate symptoms and be likely to increase self-harm behaviours or suicidal thoughts.

Age is also a risk factor. Research indicates that the risk of encountering this content online increase with children's age. Children and young adults are also more likely to experience a contagion effect: to imitate behaviours they see, and to be impulsive. This makes these age groups more vulnerable to harm from viewing suicide or self-harm content.

Although not directly linked to demographics, children who have had certain previous life experience of trauma, such as bullying, are also at increased risk from encountering this content.

#### *Service type risk factors:*

Social media and video-sharing services are frequently referenced as places where children encounter this content online. Content can be recommended to children on their feeds, and children actively searching for this content can find and access it.



Some discussion forums and chat room services are described as having little moderation, thus enabling harmful suicide and self-harm content to become more prevalent, including for children. Due to their role in enabling children to encounter suicide and self-harm content, these service types have been included in the draft Children's Risk Profiles.<sup>206</sup>

Other service types also play a role. On information-sharing services, detailed information on suicide methods can be found by children. Evidence also shows that messaging services are used to share harmful suicide and self-harm content including, for example, the distribution of graphic images of self-harm injuries, as well as links to websites providing instructions on how to self-harm.

*Functionalities and recommender system risk factors:*

Content recommender systems may increase the risk of children encountering harmful content, often without actively searching for it. Children risk being recommended suicide and self-harm content alongside content that may share similar characteristics or attributes, such as general discussion, safety advice and emotional support relating to suicide and self-harm. If a child is recommended large volumes of suicide and self-harm content, this could have a cumulative negative effect on their wellbeing. Content recommender systems have therefore been included in the draft Children's Risk Profiles.

The evidence we have assembled has multiple examples of children encountering graphic images of self-harm that have been posted by others. Although the ability to post images allows children to express themselves and communicate with others, some of the images shared may be upsetting or triggering to some children, including potentially to the child who is sharing them. This content can be shared in the context of user groups. User generated content searching allows children to search contents tags (e.g. hashtags and keywords), which can enable harmful suicide and self-harm content to proliferate online and evade the content moderation techniques applied to suicide and self-harm content. Due to their role in disseminating suicide and self-harm content, posting images and videos, re-posting or forwarding content, user groups and user-generated content searching have been included in the draft Children's Risk Profiles.

Other functionalities can contribute to the building of communities in which suicide and self-harm content is shared. Accounts with many user connections that share suicide and self-harm content risk validating the posters self-harming actions and may increase the risk of posting more extreme content. Commenting on content enables the sharing of personal experiences related to suicide and self-harm, which may be harmful and contribute to cumulative harm. Suicide and self-harm content can also be shared via livestreaming, a format that attracts further engagement

---

<sup>206</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.

through commenting and group messaging functionalities. These three functionalities have also been included in the draft Children’s Risk profiles.

Other functionalities play a role in children encountering suicide and self-harm content. For example, functionalities which allow content to be edited can also increase the likelihood of children unexpectedly encountering suicide or self-harm content online. The evidence describes examples of visual media being edited and combined by those posting the content, so that users encountering it may not initially realise that a video/image will contain harmful content. Both direct and group messaging can also facilitate the sharing of harmful suicide and self-harm content, such as through links to other websites, or sharing graphic self-harm-related images and/or instructions.

*Business models’ risk factors:*

Advertising-based business models are a risk factor for children encountering self-harm and suicide content. If children have previously engaged with this content, some services will send push notifications and emails to encourage children to continue engaging with the service provider, suggesting related content similar to that which has been viewed before.

## Introduction

---

- 7.2.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by: (a) content which encourages, promotes, or provides instructions for suicide; or (b) content which encourages, promotes, or provides instructions for an act of deliberate self-injury on U2U services (‘risks of harm’). These kinds of content have been designated as primary priority content that is harmful to children.
- 7.2.2 While the wording in the Online Safety Act (‘the Act’) refers to ‘self-injury’, evidence throughout the section generally refers to ‘self-harm’. Some organisations have also flagged potential complexities and sensitivities regarding the use of the term ‘deliberate’ self-injury.<sup>207</sup> We therefore use the terms ‘suicide content’, or ‘self-harm content’ to refer to the content described above, throughout this section.
- 7.2.3 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section 7). Harm means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.2.4 This section considers suicide content and self-harm content together. This reflects the evidence base, which often explores these content types together. It is also often difficult to distinguish between content that focuses solely on suicide, and content which focuses on self-harm without suicidal intent. There are similarities in how these types of harmful content manifest online, and in the risks they pose to children, and in this section, we will reflect any important distinctions between suicide and self-harm content.

---

<sup>207</sup> “Deliberate self-harm: we don’t use the word ‘deliberate’ any more. It makes it sound as though the individual is to blame, that their self-harm was a calmly planned action rather than the result of emotional anguish or intense distress.” Royal College of Psychiatrists, 2020. [Self-harm](#), [accessed 12 September 2023].

- 7.2.5 In our draft Guidance on Content Harmful to Children we provide guidance on identifying suicide and self-harm content, including examples of what Ofcom considers to be, or not to be, suicide and self-harm content (Sections 8.3 and 8.4 of the Guidance). Examples of self-harm content include descriptions and depictions of self-harm methods, in which the method is promoted or encouraged; images and depictions of self-harm wounds; as well as challenges or dares instructing self-harm. Examples of suicide content includes descriptions and depictions of suicide or self-harm methods, instructions for suicide or self-harm methods, and content which discusses or alludes to self-harm in a normalised or romantic manner, and therefore promotes it. However, there are important nuances that services should consider in understanding suicide and self-harm content, particularly relating to content that appears to be recovery focused but may contain characteristics or appear in contexts that can be harmful to children. See ‘Guidance on eating disorder content’ (Section 8.5) for more detail and contextual considerations on identifying this content.
- 7.2.6 Services should be aware that suicide and self-harm content varies and is not always intended to cause harm. Users who share harmful suicide or self-harm content may be suffering from mental health problems themselves and use online spaces to express their feelings and seek support by connecting with others who may be having similar experiences. However, where content encourages, promotes or provides instruction for suicide or an act of self-harm, even when it is done as an act of self-expression and/or is not intended to harm, this content is categorised as content harmful to children in the Act as Primary Priority Content, and services need to ensure that children are prevented from accessing this content, while preserving the wider rights of adults to express themselves freely and access information.
- 7.2.7 Due to limitations in the evidence base available, some of the evidence described in this section relates to content that is broader than the definitions of suicide and self-harm content in the Act. Where such evidence has been included, it is to help services better understand suicide and self-harm content from the available evidence.
- 7.2.8 As part of this, the evidence we refer to may also include content that could amount to the offence of encouraging or assisting suicide or serious self-harm and be considered illegal content. For further information on what content may amount to such an offence, please refer to the [Illegal Harms Judgement Guidance](#). We have considered the risks of harm to individuals presented by content on U2U services which may amount to these offences in the [Illegal Harms Register](#) (see ‘Encouraging or assisting suicide or attempting suicide or serious self-harm offences’ section).
- 7.2.9 There are ethical and legal limitations to conducting research into this type of content, particularly among children. Research has often relied on qualitative information,<sup>208</sup> including individuals’ self-reported experiences, for insights into risk factors.<sup>209</sup>
- 7.2.10 To build our evidence base on suicide and self-harm content, Ofcom commissioned research into children’s experiences of encountering suicide, self-harm and eating disorder content as part of our preparation for regulation (see footnote for sample

---

<sup>208</sup> This includes an Ofcom qualitative research project which we refer to throughout the section, which looked at children of encountering suicide, self-harm and eating disorder content online.

<sup>209</sup> As noted in the [Illegal Harms Register](#) for ‘encouraging or assisting suicide (or attempted suicide) or serious self-harm offences’.

details).<sup>210</sup> The findings from this research are noted where relevant throughout, but we have also considered the wider landscape of the evidence available.

## How suicide and self-harm content manifests online

---

- 7.2.11 This sub-section looks at how suicide and self-harm content manifests online and how children may be at risk of harm.
- 7.2.12 Suicide and self-harm content varies widely and can take many different forms online. It may also have varying impacts on individuals depending on the context and a child's individual circumstances and mental state at the time of viewing the content. See the draft Guidance on Content Harmful to Children (Section 8.3 and 8.4) at the end of this volume for more detail.
- 7.2.13 Ofcom's research found that children and young adults aged 13-21 who had encountered content associated with suicide and self-harm had 'high levels of familiarity with such content, categorising it as prolific on social media'.<sup>211</sup> The content encountered by children included: awareness-raising content; people sharing stories/photos of their self-harm wounds; self-harm and/or suicide instructions; and graphic suicide/self-harm content embedded within unrelated video clips.<sup>212</sup>
- 7.2.14 Different types of content relating to suicide and self-harm can be found in the same spaces online. Although not specifically focused on children, one study found that general discussion, safety advice and emotional support can share similar spaces as graphic and potentially distressing content and can sometimes be attached to the same hashtags (see 'Risk factors: functionalities and recommender systems' sub-section for more information on this study and the use of hashtags more generally).<sup>213</sup>
- 7.2.15 These environments present several pathways to encountering suicide and self-harm content. These include encountering the content by accident (for example, when harmful content shares hashtags with non-harmful content and is searched for), and actively seeking this type of content. Other pathways may include users being exposed to harmful content, for example via content recommender systems, despite having tried to

---

<sup>210</sup> This study involved speaking with 31 children and young people (aged between 13 and 21) about their experiences of encountering this content online. The sample included some who had lived experience of eating disorders, self-harm or suicidal ideation, anxiety and depression (14 participants). Those aged 18-21 were reflecting back to their experiences as children. The study also included interviews with ten stakeholders who worked with children and young people aged 13-18 in a safeguarding capacity. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>211</sup> Adults in the sample were reflecting back to their experiences as children.

<sup>212</sup> Adults in the sample were asked to reflect back to childhood. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>213</sup> Lavis, A. and Winter, R., 2020. [#Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media](#), *The Journal of Child Psychology and Psychiatry*, 61 (8). [accessed 2 February 2024].

disengage from suicide or self-harm content as a result of having previously encountered it.<sup>214</sup>

## Presence

- 7.2.16 Ofcom's Online Experiences Tracker (OET) found in 2023 that 8% of UK internet users aged 13-17 recalled seeing or experiencing content promoting self-harm, and 6% recalled seeing content promoting suicide in a four-week period. Though these rates are comparable with those aged 18-24 (8% recalled seeing self-harm content and 6% recalled seeing suicide content), they are higher than for all other adult age groups, with 3% of those aged 18+ recalling seeing or experiencing content promoting self-harm and 3% seeing or experiencing content promoting suicide.<sup>215</sup> In 2023, a survey of children aged 9-16 found that 6% of the children surveyed self-reported encountering content promoting self-harm.<sup>216</sup>
- 7.2.17 The evidence suggests that increases in suicide rates reflect increases in social media use.<sup>217</sup> Since 2017-2018, rates of hospital admissions for self-harm among 8-17-year-olds increased slightly each year, before rising by 22% between 2021 and 2022. In 2022, in the UK, it was reported that there were more than 25,000 hospital admissions for self-harm among children in this age group, which made up more than a quarter of total self-harm admissions.<sup>218</sup>
- 7.2.18 Young people with certain vulnerabilities such as autism or a physical illness may be at increased risk of encountering harmful self-harm and suicide content. A study exploring life online for vulnerable people noted several groups of children (aged 11-17) who recalled encountering this content more often than those with no self-reported vulnerabilities.<sup>219</sup> This is explored in more detail in the 'User demographics' section below.

## Impacts

- 7.2.19 The effects of encountering suicide and self-harm content are extensive and severe. They include harm to children's wellbeing, the exacerbation of children's mental health conditions (including self-harm behaviours and suicidal ideation), and in extreme cases, death.
- 7.2.20 The impact of encountering this content varies according to the circumstances of the child and the context in which it is viewed, as well as the volume of content encountered. Evidence suggests that children encountering this content are likely to experience

---

<sup>214</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#)

<sup>215</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>216</sup> Internet Matters, 2023. [Digital tracker](#) [accessed 15 January 2024].

<sup>217</sup> Memon, A. M., Sharma, S. G., Mohite, S. S., & Jain, S., 2018. [The role of online social networking on deliberate self-harm and suicidality in adolescents: A systematized review of literature](#). *Indian journal of psychiatry*, 60(4). [accessed 6 February 2024].

<sup>218</sup> Fillis, V., Fagg, J., Unia, E., 2023. [Self-harm hospital admissions up 22% for children aged eight to 17](#), BBC, 23 March. [accessed 2 February 2024].

<sup>219</sup> Note: Figures cited have been taken from the narrative of the report. 'Vulnerable children' in this report refers to children with anger issues; autism; learning, speech, hearing, vision or mental health difficulties; care experiences; those with a physical illness; eating disorder; being a carer; having English as a second language or worrying about life at home. Source: Internet Matters and Youthworks. [Refuge and Risk: Life Online for Vulnerable Young People](#). [accessed 13 February 2024].

negative emotions, including upset, distress, intense anxiety, fear, and shame or guilt about their own self-harm behaviours.<sup>220</sup> A study with children aged 9-16 found that of the 6% of children who self-reported encountering content promoting self-harm, three in five (61%) said it had had a negative effect on them. Another study with children aged 12-15 found that 40% of those who came across content promoting self-harm reported high levels of annoyance, upset or frustration.<sup>221</sup>

- 7.2.21 The evidence demonstrates how encountering this content can exacerbate poor mental health in children, specifically increasing the risk of self-harm behaviours and suicidal ideation. Adolescence is already a time of higher vulnerability for developing mental health disorders. There are various debates on cause and effect, namely whether these thoughts are already present before encountering content,<sup>222</sup> or whether exposure to the content triggers the thoughts.<sup>223</sup>
- 7.2.22 A study by Samaritans and Swansea University found that children aged 16+ and adults with a history of self-harm were more likely to report that they were 10 years old or younger when they first viewed self-harm or suicide content online, whereas those with no history of self-harm were more likely to report being aged 25+ at the time of first encountering this content.<sup>224</sup>
- 7.2.23 Ofcom research with 13-21 year olds found that some participants with lived experience reported having symptoms already, and then being drawn to this content, while others reported a developing or worsening of their symptoms only after encountering this content online.<sup>225</sup> Children and young people who had seen the content, as well as those with lived experience, expressed concern that encountering this type of content could be triggering, exacerbating existing mental health challenges and instigating new ones in vulnerable people. They also expressed frustration with recommender systems as a way

---

<sup>220</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>221</sup> Jigsaw Research, Ofcom and ICO. [Internet users' experience of potential online harms: summary of survey research](#), 2020. [accessed 29 April 2024].

<sup>222</sup> One point of view from the evidence is that often, self-harm precedes self-harm-related internet use (rather than internet use leading to self-harm), or that offline experiences contribute to young people going online to seek this content (e.g., an argument with a parent about self-harm behaviour led one participant to seek out online communities to speak with others who would understand their point of view). Source: Lavis, A. and Winter, R. 2020. [#Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media](#), *The Journal of Child Psychology and Psychiatry*, 61 (8). However, as seen later in the recommender systems section, there is evidence of children then being recommended further related content following their initial engagement.

<sup>223</sup> While there is limited evidence focusing solely on children, a recent review looked at evidence from multiple studies, some of which included participants aged under 18. This review looked at findings from 15 studies on the potential impacts of viewing self-harm related images online, and found both harmful and protective effects. All 15 studies presented harmful effects, including being 'triggered' by the images, which may lead to normalising or escalating self-harm through sharing tips and ideas, and being encouraged to share images or compete with others. Source: Susi, K., Glover-Ford, F., Stewart, A., Bevis, R, K. and Hawton, K., 2023. [Research Review: Viewing self-harm images on the internet and social media platforms: systematic review of the impact and associated psychological mechanisms](#), *The Journal of Child Psychology and Psychiatry*, 64 (8). [accessed 2 February 2024].

<sup>224</sup> Samaritans, 2022. [How social media users experience self-harm and suicide content.](#) [accessed 20 February 2024].

<sup>225</sup> Lived experience includes participants with lived experience of eating disorders, self-harm, suicidal ideation, anxiety, and depression. At the time of being interviewed, all young people with lived experience had been in recovery for a period of at least six months.



of encountering this content. This was due to the perception that a recommender system would register any brief interaction or negative comment on this content as an engagement or interest in it, resulting in further recommended content.<sup>226</sup>

- 7.2.24 Suicide and self-harm content can exacerbate mental health conditions and associated harmful behaviours by encouraging imitation of self-harm actions. Evidence suggests that children may be at higher risk of the ‘contagion effect’. Research by 5Rights Foundation and Revealing Reality with 12-18 year-olds found that children and young adults at this age seek affirmation and attention by copying popular trends and imitating the behaviours of others.<sup>227</sup> Combined with the impulsiveness that often accompanies self-harm behaviour in adolescent years (11-25),<sup>228</sup> these tendencies pose a particular risk of harm from suicide or self-harm content.
- 7.2.25 Children and young people with lived experience also said that they would often learn about new ways to harm themselves as a result of encountering content online.<sup>229</sup> Samaritans identifies this as ‘contagion effect’: content that presents self-harm and suicide behaviours (such as viral suicide and self-harm ‘challenges’) encouraging users to engage in harmful behaviour) may inspire other users to undertake similar acts. Samaritans identifies children and young adults up to the age of 24 as being the most susceptible to this. Certain factors affect this risk of imitation; the ‘contagion effect’ may be more likely when the viewer identifies similarities between themselves and the original uploader of the content.<sup>230</sup> Similarly, children and young adults felt that children could be particularly affected.<sup>231</sup>
- 7.2.26 The evidence suggests that online communities specifically formed around experiences of mental health concerns present a significant risk of exacerbating these concerns, including self-harm and suicidal ideation. These communities may discuss recovery, without intending to cause harm. But those engaging with these communities are often the most vulnerable, and these online spaces can – often unwittingly, and potentially due to poor moderation – encourage, normalise, and exacerbate harmful behaviours.
- 7.2.27 Engaging with these communities can lead individuals to continue, or increase, their self-harm behaviours, and they may share graphic suicide and self-harm content as part of this. For example, in one study in which researchers interviewed young women over the age of 18 who used, or had used, social media to engage with self-harm content, one participant noted that to maintain online support, it can feel as though you need to continually prove that you need this support; this was given as a reason for posting

---

<sup>226</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>227</sup> 5Rights Foundation, 2021. [Pathways: How digital design puts children at risk.](#) [accessed 6 February 2024]. This was a qualitative study with 21 children and young people aged 12 to 18 across the UK.

<sup>228</sup> Lockwood, J., Daley, D., Townsend, E. and Sayal, K., 2017. [Impulsivity and self-harm in adolescence: a systematic review](#), *European Child & Adolescent Psychiatry*, 26. [accessed 13 February 2024].

<sup>229</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>230</sup> Samaritans, 2022. [Towards a suicide-safer internet.](#) [accessed 6 February 2024].

<sup>231</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)



increasingly graphic images.<sup>232 233</sup> Another study looked at self-harm images on a popular social media site, and found that images that depicted more severe wounds received more comments.<sup>234</sup>

- 7.2.28 Other evidence reports how these online communities can feel competitive. In Ofcom research among 7-17-year-olds, a 16-year-old participant recalled her initial excitement when she engaged with an online community focused on mental health. She described how this validated her experiences and reassured her that others were experiencing similar challenges. However, she later felt that these spaces were prolonging her mental health conditions, as certain spaces were ‘competitive’, with people trying to ‘outdo each other’ in terms of how much they were struggling.<sup>235</sup>
- 7.2.29 This competitiveness can be experienced directly in relation to self-harm behaviours. A study of 16-24-year-olds from Wales with histories of self-harm behaviour found that among those who had previously uploaded self-harm pictures online, some appeared to have been encouraged by the wider online self-harm community to cause more severe harm to themselves; for example, being told that their injuries were not deep enough.<sup>236</sup> Others reported comparing their self-harm acts to others online. One participant said she would look at herself in the mirror and say, “*that’s not nearly good enough*” (in relation to the severity of her self-harming).<sup>237</sup> Ofcom is aware of a coded lexicon which is used online to describe and depict depth of self-harm injuries, which can lead to users encouraging or challenging themselves or others to carry out more severe injuries.<sup>238</sup>
- 7.2.30 In extreme cases, suicide and self-harm content has been linked to children taking their own lives. For example, the coroner’s inquest report on Molly Russell, who took her own life aged 14 in 2017, attributed the impact of online content to her death, stating: “*Molly Rose Russell died from an act of self-harm whilst suffering from depression and the negative effects of on-line content*”.<sup>239</sup> In particular, the cumulative impact and risk of harm amounting from sustained exposure to suicide and self-harm content propagated by recommender algorithms was noted in the coroner’s report.
- 7.2.31 Evidence suggests that suicide content contributes to cases of child suicide in the UK. A report which looked at deaths by suicide of children and young adults aged 10-19 in the UK (based on national mortality data between 2014-2016) found that almost a quarter (24%) of these children and young adults were known to have had ‘suicide-related online experiences’ (including actions such as searching the internet for information on suicide methods, visiting websites that may have encouraged suicide and communicating suicidal

---

<sup>232</sup> Lavis, A. and Winter, R., 2020. [#Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media](#), *The Journal of Child Psychology and Psychiatry*, 61 (8).

<sup>233</sup> The participants interviewed were young adults aged over 18; however, the evidence has been included as children may also be able to access these same online communities.

<sup>234</sup> Brown, R. C., Fischer, T., Goldwich, A. D., Keller, F., Young, R. and Plener, P. L., 2018. [#cutting: Non-suicidal self-harm \(NSSI\) on Instagram](#). [accessed 2 February 2024].

<sup>235</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>236</sup> Jacob, N., Evans, R. and Scourfield, J., 2017. [The influence of online images on self-harm: A qualitative study of young people aged 16-24](#), *Journal of Adolescence*, 60 (1). [accessed 2 February 2024].

<sup>237</sup> Jacob, N., Evans, R. and Scourfield, J., 2017. [The influence of online images on self-harm: A qualitative study of young people aged 16-24](#), *Journal of Adolescence*, 60 (1).

<sup>238</sup> *We have deliberately omitted examples or descriptions of these codewords here to protect readers.*

<sup>239</sup> The Coroner’s Service, 2022. [Prevention of Future Deaths](#). [accessed 9 February 2024].

ideas online).<sup>240</sup> This included 13% who had searched the internet for information on suicide methods. Of those, just under a third (31%) died by a method they had previously searched on the internet. Other evidence suggests that young people may be particularly vulnerable to imitating suicides that they see in the media.<sup>241</sup> This suggests that the presence online of details of suicide methods can, at the very least, act as a source of information for subsequent method choice.<sup>242</sup>

7.2.32 In other well-known and tragic cases of children taking their own lives in the UK, Ofcom received evidence from the parents of both Sophie Parkinson and Frankie Thomas. We understand both also were exposed to and had engaged with suicide content in the months leading up to, and days of, their deaths. Both emulated methods in online content that they had engaged with.<sup>243</sup>

## Evidence of risk factors on user-to-user services

---

7.2.33 We consider that the risk factors below are likely to increase the risk of harm to children relating to suicide and self-harm content. This is also summarised in the grey box at the start of this section.

### Risk factors: Service types

7.2.34 Research indicates that the following service types can increase the risk of suicide and self-harm content manifesting online: social media services, messaging services, video-sharing services, discussion forums and chat rooms, and information-sharing services.

#### *Social media and video-sharing services*

7.2.35 The evidence suggests that social media and video-sharing services are a space where children encounter harmful suicide and self-harm-related content.<sup>244</sup>

7.2.36 Several studies demonstrate the availability of this content to children on social media services as well as video-sharing services. Research by 5Rights Foundation and Revealing Reality involved the use of avatar accounts (proxy children's profiles created on social media to mimic the age, interests and behaviours of real children). The report included screenshots of deliberate self-harm, and posts demonstrating suicidal ideation that the

---

<sup>240</sup> However, the authors flag limitations: that this may be an under-estimate, as suicide-related internet use is not always documented, and causal links cannot always be identified. Source: Rodway, C., Tham, SG., Ibrahim, S., Turnbull, P., Kapur, N. and Appleby, L. 2022. [Online harms? Suicide-related online experience: a UK-wide case series study of young people who die by suicide](#) (p.4442). *Psychological Medicine*, 54 (4434-4445). [accessed 6 February 2024].

<sup>241</sup> A comprehensive review of 108 studies finds strong evidence that publication of real and fictional suicides in media can cause suicide levels to increase, this is known as the 'Werther effect' or 'copycat suicides'. Additionally, the review identified that younger people were found to be particularly vulnerable to suicide imitation. Source: Domaradzki, J. 2021, [The Werther Effect, the Papageno Effect or No Effect?](#) A Literature Review. [accessed 15 February 2024].

<sup>242</sup> Rodway, C., Tham, SG., Ibrahim, S., Turnbull, P., Kapur, N. and Appleby, L. 2022. [Online harms? Suicide-related online experience: a UK-wide case series study of young people who die by suicide](#). *Psychological Medicine*, 54 (4434-4445).

<sup>243</sup> Bereaved parents' response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation.

<sup>244</sup> The term 'social media' in some evidence may include platforms that are notified video-sharing platforms.

13-year-old avatar account received as a result of searching for ‘suicide’ on a video sharing service.<sup>245</sup>

- 7.2.37 Similarly, another study reported several types of suicide and self-harm content being accessible to child accounts (set at age 13), including user-generated content discussing desires or plans to attempt suicide, methods for hiding suicide attempts, and videos about self-harm, with a focus on razor blades.<sup>246</sup> Refer to sub-section ‘Recommender Systems’ within this section for more detail on how children’s engagement with certain kinds of content can increase the risk of children encountering suicide and self-harm content.
- 7.2.38 Other functionalities common on social media and video-sharing services contribute to the risk of harm. Evidence suggests that video content can often be combined and edited to produce content promoting suicide and self-harm (refer to sub-section ‘Editing visual media and combining content’ within this section for more detail). It is likely that such content is being shared on video-sharing services.
- 7.2.39 The forming of communities on social media services can also present a risk; an evidence review found that social media services have been noted as spaces where some users discuss suicidal ideation and plans.<sup>247</sup> Self-harm communities are reported to gather around particular keywords and tags of content. See sub-section ‘Content tagging’ within this section for more detail.

#### *Messaging services*

- 7.2.40 Messaging services may be used to distribute suicide and self-harm content, and this can include the sharing of graphic content.
- 7.2.41 Young people with lived experience of a mental health difficulty reflected that for children, the sharing of harmful content e.g. graphic self-harm content, typically occurs on messaging services within closed groups.<sup>248</sup>

---

<sup>245</sup> Note: The research involved setting up a series of avatars, which were profiles set up on social media apps that mimicked the online profiles of real children who took part in the interviews for this project. The age of the real child was used to register the profile and displayed in the bio of the user account. Source: 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk.](#)

<sup>246</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Centre for Countering Digital Hate, 2022. [Deadly By Design: TikTok pushes harmful content promoting eating disorders and self-harm into users’ feeds.](#) [accessed 6 February 2024].

<sup>247</sup> NatCen and City, University of London, 2022. [Content and activity that is harmful to children within scope of the Online Safety Bill – A Rapid Evidence Assessment.](#) [accessed 6 February 2024].

<sup>248</sup> The young people aged 18 and over, who participated in the research, were reflecting back at their experiences during childhood. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

## Gaming services

7.2.42 Children can encounter self-harm or suicide content through messages on gaming services. In an NSPCC helpline insight briefing, an example was provided of a 14-year-old child contacting the helpline about receiving self-harm messages in an online game.<sup>249</sup>

## Discussion forums and chat room services

7.2.43 Discussion forums and chatroom services present a particular risk for suicide and self-harm content. These spaces can be used to share graphic images or detailed information on methods, or act as spaces where self-harm or suicidal behaviours are actively encouraged. Therefore, some of the content within such forums may also be illegal.<sup>250</sup>

7.2.44 Some evidence suggests that harmful self-harm and suicide content may be shared within online communities in dedicated sub-groups within more general discussion services. These are often perceived to have little outside moderation, and therefore it is perceived to be easier to find or encounter harmful content on them.<sup>251</sup> See also sub-section ‘User groups’ within this section.

7.2.45 Discussion forums have been linked to incidences of death by suicide. One suicide forum site has been linked to at least 50 UK deaths (the youngest being 17). Specific inquests also highlight the risk posed by discussion forums. In the Regulation 28 Report to Prevent Future Deaths,<sup>252</sup> following the inquest into the death of Bronwen Morgan (“BM”) who took her own life, the coroner set out that Ms Morgan “*had registered with, & was engaging in discussion forums*” which “*encompassed her discussing & seeking advice from fellow users in respect of, methods of self-harm/suicide including the purchasing & use of the substance... used by BM which led to her death*”. Although Ms Morgan was an adult, this case demonstrates the risk to children from this service type, should they try and seek harmful information about specific methods for suicide and deliberate self-harm.<sup>253</sup>

7.2.46 Suicide and self-harm content can also be encountered in forums discussing seemingly unrelated topics. For example, the NPSCC reported a case in which a 17-year-old child was being sent messages and images by a stranger in a gaming group on a discussion forum. The stranger disclosed that they ‘liked’ to self-harm, and then sent unsolicited, graphic images of self-harm injuries. The parent explained that their child had been having trouble sleeping since encountering the content.<sup>254</sup>

---

<sup>249</sup> This case study describes how the person in the game was unknown to the child, and began leaving messages in the game chat threatening that they were going to self-harm. The child explained that the messages were making them feel uncomfortable and she had asked the person to stop, but the person continued. She felt as though they were trivialising self-harm in the communication, which she found triggering, as she had struggled with self-harm in the past. Source: NSPCC Learning, 2022. [Children’s experiences of legal but harmful content online](#). [accessed 9 February 2024].

<sup>250</sup> Ofcom, 2023. [Protecting people from illegal harms online: Annex 10: Online Safety Guidance on Judgment for Illegal Content](#).

<sup>251</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>252</sup> The Coroner’s Office, 2023. [Regulation 28 Report to Prevent Future Deaths following the death of Bronwen Morgan](#). [accessed 9 February 2024].

<sup>253</sup> The Coroner’s Office, 2023. [Regulation 28 Report to Prevent Future Deaths following the death of Bronwen Morgan](#).

<sup>254</sup> NSPCC, 2022. [Children’s experiences of legal but harmful content online](#).

## Information-sharing services

- 7.2.47 Evidence suggests that children may access detailed information on self-harm and suicide methods via information-sharing services. In response to our 2023 Protection of Children Call for Evidence (our 2023 CFE), PAPYRUS (a national charity dedicated to the prevention of young suicide) stated that an online encyclopaedia site contained detailed information on suicide methods, easily accessible by children. They said that this included suicide instructions that were based on the height and weight of users, also mentioning ‘*pain rating*’.<sup>255 256</sup>

## Risk factors: User base

### User base size

- 7.2.48 Services with both large and small user bases pose risks in relation to suicide and self-harm content. For example, the larger a service’s user base, the greater the number of people who are likely to encounter content, particularly where it is amplified through recommender systems, meaning that content can receive substantial amounts of engagement.<sup>257</sup> This, in turn, heightens the risk of the ‘contagion’ effect (as referred to above). Meanwhile, services with a small user base may be more likely to foster the sharing of more niche or specialised content, which could include suicide or self-harm content.

### User demographics/circumstances

- 7.2.49 The following sub-section outlines key evidence of user base demographic factors and risks of harm to children, which can include protected characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.
- 7.2.50 Data suggests that user base characteristics including age, gender, mental health and disability could lead to an increased risk of harm to individuals. Although not directly linked to user demographics, other personal circumstances and experiences have been identified as risk factors for encountering this content, such as experience of bullying.

#### Age

- 7.2.51 Research indicated that the risk of encountering harmful suicide and self-harm related content increases with age; highest for the early teens and those approaching adulthood. Evidence also indicates that children are likely to be affected differently by this content at different ages.
- 7.2.52 The likelihood of encountering this content (particularly self-harm content) increases as children get older. A survey study conducted in 2010 across 25 European countries (including the UK) found that, in the previous 12-month period, self-harm content had been encountered by 4% of 11-12-year-olds, 7% of 13-14-year-olds, and 10% of 15-16-

---

<sup>255</sup> PAPYRUS response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>256</sup> Samaritans Guidance for [reporting on self-harm and suicide content online](#) states that ‘a death by suicide should never be portrayed as quick, easy, effective or painless, or include comments that suggest suicide as a ‘solution’’. [accessed 16 April 2024].

<sup>257</sup> Of the participants interviewed, the most common pathway for children initially encountering this content was on recommended feeds on social media. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

year-olds. Content showing suicide methods had been seen by 3% of 11-12-year-olds, 5% of 13-14-year-olds and 6% of 15-16-year-olds.<sup>258 259</sup>

- 7.2.53 Actual reported suicide rates among young people in England suggest that older children are particularly vulnerable to harm from encountering suicide or self-harm content. In 2014-2015, among those who died by suicide aged below 20, the number of suicides was highest among those aged 18-19. Among the children who had died by suicide, the number of suicides was highest among those aged 17.<sup>260</sup>
- 7.2.54 Certain ages present a particular risk of mental health conditions due to physiological and psychological changes. Developmental stages and associated risk are explored in the Recommended age groups section (Section 7.15), however, evidence specifically linking certain developmental stages with risk of harm from suicide and self-harm content is set out here.
- 7.2.55 In the inquest into the death of Molly Russell, adolescent psychiatrist Dr Venugopal explained that children, especially girls, around the age of 14 are at an increased risk of harm from encountering suicide and self-harm content. This is linked to increased risk of anxiety and depression, following changes in hormones from puberty and increased sensitivity to stress hormones “specifically in the pre-frontal cortex to oestrogen... along with development of identity, being more aware of the body’s changes, interests, etc.”<sup>261</sup>
- 7.2.56 A report by Barnardo’s identified 17-19 years old as a key developmental stage when young people use social media to measure self-worth, while also facing social pressures.<sup>262</sup> Practitioners raised concerns for this age group regarding non-sexual grooming, such as around the promotion of self-harm or suicide.

#### *Gender*

- 7.2.57 Girls have an increased likelihood of encountering content promoting self-harm. Ofcom’s OET found that 11% of girls aged 13-17 had recalled seeing or experiencing content promoting self-harm in a four week period, compared to 4% of boys aged 13-17. Girls were also slightly more likely than boys to encounter content promoting suicide (7% vs 5%) although the difference was not statistically significant.<sup>263</sup>

---

<sup>258</sup> Livingstone, E., Haddon, L., Görzig, A. and Ólafsson, K., 2011. [Risks and safety on the internet: the perspective of European children: full findings and policy implications from the EU Kids Online survey of 9–16-year-olds and their parents in 25 countries](#). [accessed 13 February 2024].

<sup>259</sup> Although this research was conducted in 2010, it had a large base size of 25,142 children. There is also limited further evidence to highlight prevalence of encountering this content across different age groups of children.

<sup>260</sup> Rodway, C., Tham, S-G., Ibrahim, S., Turnbull, P., Windfuhr, K., Shaw, J., Kapur, N. and Appleby, L., 2016. [Suicide in children and young people in England: a consecutive case series](#). *The Lancet*, 3 (8). [accessed 13 February 2024].

<sup>261</sup> The Coroner’s Office, 27 September 2022. Transcript of the inquest into Molly Russell’s death.

<sup>262</sup> Barnardo’s., 2019. [Left to their own devices: Young people, social media and mental health](#). [accessed 13 February 2024].

<sup>263</sup> Ofcom, 2023. [Online Experiences Tracker](#).



- 7.2.58 A research paper on adolescent digital experiences, which included a review of the existing evidence, also suggested that much of the evidence in this area indicates that girls are more likely than boys to encounter self-harm online content.<sup>264</sup>

### *Mental health*

- 7.2.59 Mental health difficulties present a significant risk factor for serious harm from encountering suicide and self-harm content. Indeed, evidence suggests that those with mental health difficulties are more likely to encounter and engage with this content.
- 7.2.60 Children with mental health conditions are significantly more likely to encounter suicide or self-harm content. Ofcom’s OET data found that, of children aged 13-17 with a self-reported mental health condition, 23% had seen content promoting self-harm and 17% recalled seeing content promoting suicide in a four-week period. For children with no self-reported limiting or impacting condition, 5% reported seeing self-harm content and 4% suicide content.<sup>265</sup>
- 7.2.61 Ofcom research also found that participants with experience of mental health difficulties were more likely to actively engage with content (posting their own experiences/stories online and searching via hashtags). Those without lived experience of a mental health difficulty were more likely to encounter content passively (via recommended feeds/algorithms).<sup>266</sup>
- 7.2.62 Other cases demonstrate the heightened risk that young people with mental health conditions will carry out harmful, sometimes tragic, acts after encountering suicide and self-harm content. In an Ofcom study with 7-17-year-olds, a 17-year-old female participant with a history of poor mental health (including self-harm) reported deleting her account on a social media service after realising that the content she was seeing on her feed was reinforcing her self-harm behaviour.<sup>267</sup>
- 7.2.63 In its 2023 CFE response, the Molly Rose Foundation<sup>268</sup> reported the cumulative impacts that suicide and self-harm content can have on those already struggling with their mental health.<sup>269</sup> In response to Molly Russell’s death, the coroner in the Prevention of Future Deaths report stated, *“It is likely that the above material [online content] viewed by Molly, already suffering with a depressive illness and vulnerable due to her age, affected her mental health in a negative way and contributed to her death in more than a minimal way.”*<sup>270</sup>

---

<sup>264</sup> Stoilova, M., Edwards, C., Kostyrka-Allchorne, K., Livingstone, S., Sonuga-Barke, E., 2021. [The impact of digital experiences on adolescents with mental health vulnerabilities: a multimethod pilot study](#). [accessed 20 February 2024].

<sup>265</sup> ‘Impacting and limiting conditions’ include conditions that affect or limit daily activity or work, such as poor hearing, vision or mobility; this also includes mental health conditions. Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>266</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>267</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>268</sup> A suicide prevention charity set up in memory of teenager Molly Russell.

<sup>269</sup> Molly Rose Foundation response to 2023 Ofcom Call for Evidence: [Second phase of online safety regulation](#).

<sup>270</sup> The Coroner’s Service, 2022. [Prevention of Future Deaths](#). [accessed 20 February 2024].



## Disabilities

- 7.2.64 There is also some evidence to suggest that children with autism are more likely to encounter this type of content. A study exploring vulnerable people's life online found that young people with autism were more likely to see content promoting self-harm (31% vs 9% of young people with no listed vulnerabilities).<sup>271</sup> The National Autistic Society states that autistic people are at an increased risk of suicidal thoughts and attempts, compared to non-autistic people, although the exact numbers are unknown.<sup>272</sup>
- 7.2.65 The study by Internet Matters also reported that 16% of children who are suffering from a long-term physical illness reported seeing self-harm content 'often' and 17% reported seeing content about suicide.<sup>273</sup> It also reported that 37% of those with speech difficulties had said they had seen content about suicide at least 'once or twice'.<sup>274</sup>

## Socio-economic factors / user circumstances

- 7.2.66 There is also some evidence to suggest that children in vulnerable circumstances are more likely to encounter suicide or self-harm content. A study among 11-17-year-olds reported that children who had experienced being in care were more likely to see content promoting self-harm (16% of children in care reporting seeing self-harm content vs 9% of young people with no listed vulnerabilities).<sup>275</sup>
- 7.2.67 Children who have had certain adverse experiences may also be at greater risk from this type of content. Those with previous trauma (bullying or difficult personal relationships) may be at greater risk of encountering or engaging with suicide and self-harm content and/or behaviours.
- 7.2.68 Victims of cyberbullying have been found to be at greater risk of both self-harm and suicidal behaviour than non-victims.<sup>276</sup> A Unicef report suggests that bullying is associated with self-harm, and viewing online content related to suicide and self-harm.<sup>277</sup> Another US study found that those who were bullied were significantly more likely to say they had engaged in digital self-harm.<sup>278</sup>

---

<sup>271</sup> Note: Figures cited have been taken from the narrative of the report. See table 1 for the full list of different vulnerabilities in the survey. Source: Internet Matters and Youthworks, 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#).

<sup>272</sup> National Autistic Society. [Suicide](#). [accessed 20 February 2024].

<sup>273</sup> Note: Figures cited have been taken from the narrative of the report. Source: Internet Matters and Youthworks (Katz, A. and El Asam, A.), 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#)

<sup>274</sup> Note: Figures cited have been taken from the narrative of the report. Source: Internet Matters and Youthworks, 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#).

<sup>275</sup> Note: Figures cited have been taken from the narrative of the report. Source: Internet Matters and Youthworks (Katz, A. and El Asam, A.), 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#).

<sup>276</sup> Research has suggested that all adolescents involved in cyberbullying are psychologically vulnerable, adding that cyberbullying victims are perhaps the most vulnerable group, and arguably the most in need of support for various psychological problems. Source: Görzig, A., 2016. [Adolescents' viewing of suicide-related web-content and psychological problems: differentiating the roles of cyberbullying involvement](#), *Cyberpsychology, Behaviour and Social Networking*, 19 (8). [accessed 29 February 2024].

<sup>277</sup> Unicef, 2021. [Investigating Risks and Opportunities for Children in a Digital World: A rapid review of the evidence on children's internet use and outcomes](#). [accessed 29 February 2024].

<sup>278</sup> A US study focused on adolescent's experiences of digital self-harm (aged 12-17) found a link between digital self-harm and bullying. Source: Patchin, J. W. and Hinduja, S. 2017. [Digital Self-Harm Among Adolescents](#), *Journal of Adolescent Health*, 61 (6). [accessed 5 March 2024].

- 7.2.69 A lack of close personal relationships may also be a risk factor for encountering this type of content. A Unicef report finds that having friends may act as a protective factor for some young people. For others, closeness to family members was a substantial protective factor, whereas living without parents could be a risk factor. However, Unicef warns that the evidence on protective factors was limited, and requires further research.<sup>279</sup>

## Risk factors: Functionalities and recommender systems

### User identification

#### *Fake user profiles*

- 7.2.70 Fake user profiles used by those posting content can increase the risk of children encountering harmful suicide and self-harm content.
- 7.2.71 There are case examples in which false identities have been used to encourage others to take their own lives. For example, a study of 11-to-25-year-olds in West Yorkshire reported an account by a participant who had turned to an online community intended to offer support, and began speaking to someone who claimed to be the mother of someone who had died by suicide, and who then tried to encourage the participant to take their own life, using the method that their child had allegedly used.<sup>280</sup> We note that encouraging or assisting the suicide or attempted suicide of another person, with intent to encourage or assist suicide or an attempt of suicide, is likely to be an illegal offence. See the [Illegal Content Judgement Guidance](#) (see ‘Assisting or encouraging suicide’ section). However, this example demonstrates that false identities can be used to create personas that child users would be likely to relate to and be influenced by.

### User networking

#### *User connections*

- 7.2.72 Some users who engage with content (including posting) focused on self-harm can have large numbers of user connections (e.g. followers).
- 7.2.73 The evidence notes that such users may see the large number of user connections as validation of their self-harming actions, making it more difficult for them to disengage with the harmful content, hindering their recovery and encouraging further sharing of content of this nature.<sup>281</sup>
- 7.2.74 Ofcom research found that children and young adults encountered content relating to suicide (although less frequently than content promoting self-harm or eating disorders) through following certain celebrities or influencers whose communities of followers would discuss and actively engage with the issue.<sup>282</sup>

---

<sup>279</sup> Unicef, 2021. [Investigating Risks and Opportunities for Children in a Digital World: A rapid review of the evidence on children’s internet use and outcomes](#).

<sup>280</sup> Social Finance, [date unknown]. [Social media, psychological harm and violence among young people](#). [accessed 9 February 2024].

<sup>281</sup> Royal College of Psychiatrists, 2014. [Managing self-harm in young people](#). [accessed 9 February 2024].

<sup>282</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

- 7.2.75 An increase in user connections may also increase the risk of a user posting harmful content. A participant in a UK study<sup>283</sup> said that the content they had posted transitioned to self-harm images as they gained more followers.<sup>284</sup>

#### *User groups*

- 7.2.76 The ability to create user groups can increase the risk of harmful suicide and self-harm content being shared among children. In its 2023 CFE response, POPYRUS stated that there are several known user groups on social media services where members talk about ending their lives. They claim that, while some members within these spaces will encourage users to seek support, others will encourage the user to end their lives.<sup>285</sup>
- 7.2.77 Ofcom research identified examples of content being shared and forwarded among children within user groups on social media services. Examples included images of self-harm wounds being shared within user groups, and discussion of self-harm methods.<sup>286</sup>
- 7.2.78 Some evidence suggests that harmful self-harm and suicide content may be shared within dedicated sub-groups, especially on discussion forum services. These are sometimes reported to be ‘self-regulating’, with little perceived outside moderation.<sup>287</sup> Therefore it may be perceived to be easier to find or encounter harmful content on them.

## User communication

#### *Livestreaming*

- 7.2.79 Livestreaming can increase the risk of children being exposed to suicide and self-harm content.
- 7.2.80 For example, one young participant in a research study among 11-25-year-olds in West Yorkshire explained that they had seen a livestream of a man taking his own life on a social media service.<sup>288</sup>
- 7.2.81 There have been cases of livestreaming functionalities being used to show users self-harming or ending their life in real time. For example, in 2017 a 12-year-old girl used a livestreaming app to record her suicide, which had millions of views on two mainstream social media services.<sup>289</sup> Social Work Today<sup>290</sup> cites another case in which a 14-year-old completed suicide after a reported two-hour livestream in which she prepared to end her

---

<sup>283</sup> This study was done among adults reflecting on previous experiences.

<sup>284</sup> Biddle, L., Derges, J., Goldsmith, C., Donovan, J L. and Gunnell, D., 2018. [Using the internet for suicide-related purposes: Contrasting findings from young people in the community and self-harm patients admitted to hospital](#), p.12, *PLoS ONE*, 13 (5). [accessed 13 February 2024].

<sup>285</sup> POPYRUS response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>286</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>287</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>288</sup> Social Finance. [date unknown]. [Social media, psychological harm and violence among young people](#).

<sup>289</sup> Mortimer, C. 2017. [Girl kills herself in live online video and police cannot stop footage being viewed by millions](#). The Independent, 12 January. [accessed 17 January 2024].

<sup>290</sup> Getz, Lindsey. [Livestreamed suicide on social media – the trauma of viewership](#). Social Work Today, vol. 17, no.2, p14. 2017. [accessed 16 April 2024].

life. Another study from Bangladesh into livestreaming and suicide found that most of the victims in the case series were adolescents and young people.<sup>291</sup>

- 7.2.82 Livestreams are often paired with user groups, allowing users to communicate with one another and/or leave comments on content, which can be used to encourage the suicide or self-harm depicted on the livestream. While some users may use these messages or comments to express sympathy or coordinate help, others can encourage suicide or serious self-harm. This adds the risk that children could be exposed to comments and messages encouraging suicide and self-harm, as well as the livestream itself.
- 7.2.83 Livestreaming can intersect with group messaging and commenting functionalities to increase the risks of harm. Users can often message one another as a group within the livestream and/or leave comments.

#### *Group messaging*

- 7.2.84 Group messaging contexts, where users can contact one another, provide an environment in which harmful behaviour can be potentially encouraged in a group setting, including where self-harm may be encouraged and harmful content shared. Ofcom research identified examples of content being shared and forwarded among children via group messaging. One participant explained how she and her friends would frequently send each other pictures of their self-harm wounds. The participant explained that, as part of this, she and her peers would discuss different self-harm methods within group messaging functions.<sup>292</sup>

#### *Encrypted messaging*

- 7.2.85 Encrypted messaging services may be used to share harmful self-harm and suicide content with child users. Ofcom research found that sharing content (such as pictures of self-harm wounds) between ‘real-life friends’ would sometimes occur on closed groups within encrypted messaging services.<sup>293</sup>

#### *Commenting on content*

- 7.2.86 Comment functionalities can increase the risk of children being exposed to harmful conversations regarding suicide and self-harm.
- 7.2.87 Children can engage with the suicide or self-harm content they encounter by offering to help, or expressing their concern, via commenting on the content. Ofcom research found that children and young people often felt drawn to comment on content, and often this was related to ‘vent posts’<sup>294</sup> or due to concern for the poster. Those with lived experience explained that they would often engage in discussion in the comments, with many sharing their own stories in response to the original post.<sup>295</sup>

---

<sup>291</sup> Islam M.d.R., Qusar M.S., Islam M.d.S. 2021. [Suicide after Facebook posts—An unnoticed departure of life in Bangladesh](#). *Emerging. Trends Drugs Addict. Health*, 1. [accessed 1 March 2024].

<sup>292</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>293</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>294</sup> ‘Vent posts’ refers to content that is typically posed by a user to express personal problems or challenges.

<sup>295</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

- 7.2.88 Ofcom research also found that when posts featured individuals with self-harm scars, in cases where the post was not explicitly about self-harm, the commenting function can be used to post a negative response relating to self-harm that could be harmful to the poster and other child users. Participants expressed concern that images or videos with people who happened to have self-harm scars could lead to discussion in the comments where individuals ‘take it a bit too far’ opening up wider discussion about self-harm.<sup>296</sup>
- 7.2.89 Commenting on content risks exposing children to further harmful content and interactions, contributing to a cumulative harm. Some children and young people aged 13-21 with lived experience have described feeling stuck in a ‘rabbit hole’ once they have commented, either by being drawn deeper into conversation, or because further, sometimes more extreme, content is then generated.<sup>297</sup>
- 7.2.90 A study by the Molly Rose Foundation found examples of unmoderated comments on a popular social media site on posts related to suicide and self-harm. While many comments were supporting and empathetic, there were incidences of comments expressing suicidal ideation, and tips for sharing and concealing self-harm behaviours. Large volumes of comments risk the normalisation of self-harm as an acceptable coping strategy.<sup>298</sup>

#### *Posting content*

- 7.2.91 The ability to post content, in particular images, is an important functionality mentioned in the research and literature on suicide and self-harm. Large numbers of children can be exposed to graphic images of self-harm. Posting content enables users to communicate and establish contact with others who are experiencing similar thoughts or behaviours. It can also provide users with a sense of community in feeling that they are not alone in their thinking.<sup>299</sup> The evidence shows that it is also being used to negatively influence users’ thinking around suicide.
- 7.2.92 Graphic suicide and self-harm content can be posted on services, which other children may encounter online. A participant in Ofcom research recalled how, during childhood, they would post images to their ‘stories’ on social media services of their self-harm scars, including images containing graphic photos of wounds and blood, which others could see.<sup>300</sup> In the same study, a 15-year-old participant mentioned encountering content on

---

<sup>296</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>297</sup> Participants with lived experience included children and young people with lived experience of eating disorders, self-harm, suicidal ideation, anxiety and depression. Adults within the sample reflected back to their experiences during childhood. Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>298</sup> Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children’s experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive.](#) [accessed 29 April 2024].

<sup>299</sup> Biddle, L., Derges, J., Goldsmith, C., Donovan, J L. and Gunnell, D., 2018. [Using the internet for suicide-related purposes: Contrasting findings from young people in the community and self-harm patients admitted to hospital](#), p.12, PLoS ONE, 13 (5).

<sup>300</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

social media that showed self-harm instructions and how to hide self-harm from parents/others.

- 7.2.93 Other studies demonstrate the impact of viewing posted content. A study with 16-24-year-olds in Wales reported how seeing this posted content could inspire viewers to recreate techniques shown in self-harm images, or bring back memories of their own self-harming episodes, or increase a sense of competition.<sup>301</sup> Ofcom research found that some participants felt that posting one's own self-harm content provided a sense of release, similar to the release they received during the act of self-harm. However, this was also found to have significant negative emotional impact. Feelings of guilt and shame were expressed by participants once the content had been posted. For some participants, these feelings of guilt were due to the potential for harming others by documenting or describing their own self-harm.<sup>302</sup>
- 7.2.94 A recent report by the Molly Rose Foundation noted prompts in search results on a popular social media site that could encourage users to post and engage using the relevant hashtags. Such prompts included a click-through link which automatically opens the user's phone camera.<sup>303</sup>

#### *Re-posting or forwarding content, and reacting to content*

- 7.2.95 The ability to re-post or forward content, as well as react to content, are risk factors for encountering this content. This is because 'likes' and re-posts can act as validation from other users on a service and reinforce negative thought patterns or behaviours (and potentially encourage the further posting of potentially harmful content).
- 7.2.96 A participant in a UK study<sup>304</sup> recalls "writing this huge post about how suicide wasn't really selfish and this one girl who had a lot of followers re-posted it... and a lot of people liked it on hers and I was just like 'oh wow! People get it, people understand me'".<sup>305</sup>
- 7.2.97 The ability to re-post or forward can allow suicide and self-harm content to be shared more widely and sometimes in a different context than it was originally shared in. As referenced in sub-section 'content editing' within this section, certain features, where a user can repost content alongside their own content, enables harmful content to be re-posted.<sup>306</sup>

---

<sup>301</sup> For example, a participant explained that they would compare their injuries to self-harm images encountered online while asking themselves "why can't I do it like that?". This then led to the young person seeking to copy techniques seen on the images to achieve a similar outcome. Source: Jacob, N., Evans, R. and Scourfield, J., 2017. [The influence of online images on self-harm: A qualitative study of young people aged 16-24](#), *Journal of Adolescence*, 60 (1).

<sup>302</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>303</sup> Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children's experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive](#).

<sup>304</sup> This study was done among adults reflecting back at previous experiences.

<sup>305</sup> Biddle, L., Derges, J., Goldsmith, C., Donovan, J L. and Gunnell, D., 2018. [Using the internet for suicide-related purposes: Contrasting findings from young people in the community and self-harm patients admitted to hospital](#), p.12, *PLoS ONE*, 13 (5).

<sup>306</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).



- 7.2.98 Further examples of harmful content being re-posted were identified in Ofcom research. A 13-year-old participant recalled a girl re-posting content expressing suicidal ideation from one video-sharing platform to another, due to the ability to forward.<sup>307</sup>

## Content exploring

### *User-generated content searching*

- 7.2.99 Being able to search for user-generated content by entering terms into a search bar, or by searching through content tags/descriptors (such as hashtags) is a risk factor for children accessing harmful suicide and self-harm content. A study in Wales found that 16-to-24-year-olds with histories of self-harm behaviour said they preferred particular social networking sites, which allowed simple searches of keywords and tags to find relevant content.<sup>308</sup>
- 7.2.100 Children and young people in Ofcom’s research mentioned that they would typically use the search bars within social media services to find content, either by entering a search term, a codeword or a particular hashtag.<sup>309</sup>

### *Content tagging*

- 7.2.101 The ability to tag content,<sup>310</sup> such as through hashtags and keywords, can enable children to find suicide and self-harm content and communities. Adapted hashtags and keywords can be used to avoid content moderation.
- 7.2.102 The use of modified keywords to avoid content moderation of suicide or self-harm content, as they are not yet flagged by service providers, is a common practice. The modified keywords are often included in content descriptions, hashtags and account biographies.<sup>311</sup> A study highlighted how obvious hashtags had been blocked by certain services, often removing recovery-focused content as well. However, the researchers

---

<sup>307</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>308</sup> Note: this research was conducted in 2017, where searching functionalities within platforms may have differed from what may be possible today. Many services now allow simple searches, suggesting that this functionality is likely to present risk of harm across services more broadly. Source: Jacob, N., Evans, R. and Scourfield, J., 2017. [The influence of online images on self-harm: A qualitative study of young people aged 16-24](#), *Journal of Adolescence*, 60 (1).

<sup>309</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>310</sup> Content tagging is the process of adding keywords and phrases to user-generated content, often used to describe its subject, topic, or theme. Tags are normally applied by users themselves to help improve the discoverability of their content by other users. Hashtags are a popular form of tagging. Content tags are one of the key inputs that recommender systems use to learn about users’ preferences for content. Tagging can be used to obscure and disguise harmful content, in an attempt to bypass content moderation systems and be disseminated by recommender systems (e.g., using codewords or popular/trending tags). Content tags that are known to be strongly associated with harmful content can be blacklisted by services as part of their content moderation practices. This process is known as keyword blocking, where certain terms known to be almost exclusively associated with the dissemination of illegal and harmful content are blacklisted in relevant databases.

<sup>311</sup> ActiveFence, 2023. [Self-Harm Communities – The Distribution of Harmful Content](#). [accessed 5 March 2024].



were still able to find the full spectrum of content (including graphic imagery) by searching for less obvious or less moderated hashtags.<sup>312</sup>

- 7.2.103 Ofcom research found that children mostly referred to using hashtags within services to search for online content related to self-harm and suicide. There were very few mentions of using general search engines to look for content, with children searching hashtag descriptors within services to bring up all the content tagged under the same label.<sup>313</sup>
- 7.2.104 The evidence suggests that general discussion, safety advice and emotional support can share similar spaces with graphic and potentially distressing content, and can sometimes be attached to the same hashtags.<sup>314</sup> It is important not to lose sight of the beneficial resources that can appear under certain hashtags relating to suicide and self-harm. However, Ofcom research reported that hashtags were often used to label content inappropriately; for example, hashtags that were intended to be positive or awareness-raising were linked to negative and harmful content.<sup>315</sup>

### *Hyperlinking*

- 7.2.105 Hyperlinks can enable child users to be directed to suicide or self-harm content across different types of service. For example, a safeguarding practitioner in a research study in West Yorkshire described how they had been aware of young people receiving links to a website on how to self-harm via messaging services.<sup>316</sup>

## Content editing

### *Editing visual media*

- 7.2.106 Editing of video clips and images, both within or outside the online service, can enable children to encounter harmful suicide and self-harm content, primarily when used to conceal the true content of a video.
- 7.2.107 Research from the Molly Rose Foundation identified a range of ways in which users were editing content to bypass content moderation when posting problematic content. These included overlaying audio onto video or text-based content and using watermarks in video content to share links to other accounts that featured suicide and self-harm content.<sup>317</sup>

---

<sup>312</sup> Lavis, A. and Winter, R., 2020. [#Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media](#), *The Journal of Child Psychology and Psychiatry*, 61 (8).

<sup>313</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#)

<sup>314</sup> Lavis, A. and Winter, R., 2020. [#Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media](#), *The Journal of Child Psychology and Psychiatry*, 61 (8).

<sup>315</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>316</sup> Social Finance, [date unknown]. [Social media, psychological harm and violence among young people](#).

<sup>317</sup> Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children's experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive](#).

7.2.108 In Ofcom research, children and adults mentioned encountering self-harm content or graphic images of suicide when they were children; this content had been edited by the posters to disguise it as seemingly harmless.<sup>318</sup>

#### *Combining visual media*

7.2.109 There are also examples of users re-sharing graphic self-harm content by using a feature that enables two videos to play at the same time in a split screen. A 15-year-old participant in Ofcom’s research noted how they had used this feature on a video-sharing platform to share content that reposted another user’s video, where the original user was showing self-harm scars (which were bleeding in the video footage), alongside their own content setting out their views of the original content, stating how they found it triggering.<sup>319</sup>

7.2.110 Children and young people interviewed in Ofcom’s research reported accidentally seeing content promoting suicide and self-harm that was embedded into a video that didn’t appear to contain harmful content, and which appeared to be related to a different topic.<sup>320</sup> A participant in another study with 11-to-25-year-olds in West Yorkshire explained how they had seen a video of a person ending their life; the video was hidden inside a normal video on their recommended feed.<sup>321</sup>

### Recommender systems

#### *Content recommender systems*

7.2.111 Services which deploy content recommender systems<sup>322</sup> are at higher risk for suggesting suicide and self-harm content to children. Detailed explanation on how recommender systems work and how they can pose a risk to children is set out in Section 7.14, Wider context for understanding risk factors.

7.2.112 Content recommender systems may increase the risk of children’s exposure to suicide and self-harm content without their actively seeking such content. Evidence suggests that generally, child users tend to encounter this content through recommender systems via two pathways. The first pathway is experienced by those who may have had some engagement with suicide or self-harm content previously, and are then recommended further harmful content and, in some cases, more extreme content. For example, a child told us that the content recommender system can suggest a ‘bad video’ because they had previously watched a ‘good video’ with the same self-harm hashtag.<sup>323</sup> Those at risk of

---

<sup>318</sup> The specific detail of the methods used to obscure harmful content has deliberately been omitted here. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>319</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>320</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>321</sup> Social Finance, [date unknown]. [Social media, psychological harm and violence among young people.](#)

<sup>322</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

<sup>323</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

this pathway are likely to include those already at a heightened risk from this type of content who may be experiencing mental health difficulties.

- 7.2.113 The second pathway includes children who may not have proactively engaged with this content before, but who encounter it through their recommended feeds. Ofcom research indicates that recommender systems can lead children who are not necessarily engaging with it, to suicide and self-harm content. Across all participant groups interviewed, initial encounters of suicide or self-harm content were often reported to be unintentional, with children being algorithmically recommended harmful content they had not sought out. Participants described how recommender systems could then suggest further harmful content, depending on young people's interaction with the content. Apart from the youngest participants (c. age 13) who had less awareness of algorithms, there was a general perception (and frustration) among other children that any interaction (including hashtags they had liked, posts they had commented on, length of time they watched a video, and who they followed on their social media accounts) could lead to more related content, or content sharing similar hashtags, appearing on their recommended feeds.<sup>324</sup>
- 7.2.114 Children risk being recommended suicide and self-harm content alongside content that may share characteristics or attributes with it, such as general discussion, safety advice and emotional support relating to suicide and self-harm. These similarities make it more difficult for content classification systems to differentiate between content that is likely to be harmful, and content that is likely to be less harmful.<sup>325</sup>
- 7.2.115 Vulnerable children are more likely to be served harmful content by recommender systems. In a national survey (of 16+ year olds) by Swansea University and Samaritans (where 87% of the sample<sup>326</sup> reported having self-harmed before), 83% of the respondents reported coming across self-harm and suicide content through feeds of recommended content on social media, despite not having searched for it.<sup>327</sup> While this study looked mainly at adults, other evidence suggests that child users' experiences are likely to be similar.
- 7.2.116 When harmful content is repeatedly encountered by a child, this may lead the child to experience 'cumulative harm'.<sup>328</sup> The coroner's report following the death of Molly Russell, aged 14, who took her own life following exposure to a large volume of harmful online content, noted that, from their perspective, recommender algorithms could result in periods of binge-consuming this type of content which was likely to have a negative affect on vulnerable individuals. While some of the content judged in isolation may not

---

<sup>324</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>325</sup> Based on our understanding of content moderation systems, there are technical challenges in accurately detecting suicide and self-harm content for the purposes of Trust and Safety labels to it; this is due to the lack of granularity in content classification systems. Source: Ofcom, 2023. [Content moderation in user-to-user online services.](#)

<sup>326</sup> Sample included 5,294 individuals aged 16-84 years. Many of the participants in the study were females aged under 25, and so does not represent any population as a whole. Source: Samaritans, 2022. [How social media users experience self-harm and suicide content.](#) [accessed 20 February 2024].

<sup>327</sup> Samaritans, 2022. [How social media users experience self-harm and suicide content.](#)

<sup>328</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Children's Register of Risks (see Section 7).

have been considered overtly harmful or graphic, cases such as that of Molly Russell demonstrate the potential cumulative impact and risk of harm amounting from sustained exposure to suicide/self-harm content propagated by recommender algorithms.<sup>329</sup>

7.2.117 Another study indicates that child profiles which signal interest in mental health, eating disorders or body image are highly likely to be served harmful content. In its evidence submitted to Ofcom, Beat reiterated this concern. Researchers from the Center for Countering Digital Hate created four ‘standard’ new accounts with a female username on a video-sharing platform for users aged 13 in the USA, the UK, Australia and Canada. Four further accounts were created with a username that indicated a body image-related concern. On all these accounts, the researchers expressed an interest in body image, mental health and eating disorders, by watching and liking relevant videos (so these findings may not reflect the average child user’s experience). The first video showing suicide content appeared on one of the standard teen accounts in its recommended feed within 2.6 minutes of scrolling. Videos about self-harm and suicide videos appeared six times, with a frequency of one every 20 minutes. In comparison, on the ‘vulnerable’<sup>330</sup> teen accounts, self-harm and suicide videos appeared 12 times more often than on standard accounts. Seventy-four videos about self-harm and suicide / suicide content were shown on the vulnerable teen accounts, appearing on average every 97 seconds.<sup>331</sup>

## Risk factors: Business model and commercial profile

### Revenue models

#### *Advertising-based model*

7.2.118 There is some evidence to suggest that advertising-based revenue models may be a risk factor for suicide and self-harm content. In its 2023 CFE response, the Molly Rose Foundation noted that email and push notifications can direct children to suicide and self-harm content. These are sent to users to encourage continued engagement with a service provider to drive up advertising revenue, increasing the risk by encouraging a user to revisit potentially harmful recommended content that the user may have previously engaged with.<sup>332</sup> Some evidence suggests that there are instances where this revenue model can suggest further suicide and self-harm content to the child. One example provided in our 2023 CFE was an email sent to Molly Russell before she took her own life. The response states that this email contained images of self-harm (some of a graphic nature), suicide (including methods) and depression.<sup>333</sup>

---

<sup>329</sup> The Coroner’s Service, 2022. [Prevention of Future Deaths](#).

<sup>330</sup> ‘Vulnerable’ accounts are those that were created with a username that indicated a body-image related concern.

<sup>331</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Center for Countering Digital Hate, 2022. [Deadly By Design: TikTok pushes harmful content promoting eating disorders and self-harm into users’ feeds](#).

<sup>332</sup> Molly Rose Foundation response to 2023 Ofcom Call for Evidence: [Second phase of online safety regulation](#).

<sup>333</sup> Molly Rose Foundation response to 2023 Ofcom Call for Evidence: [Second phase of online safety regulation](#).

## 7.3 Eating disorder content

**Warning: this section contains references to content that may be upsetting or distressing, including detailed discussion of eating disorders and eating disorder content.**

### Summary: risk of harm from eating disorder content

In this section, we consider content which encourages, promotes, or provides instructions for an eating disorder or behaviours associated with an eating disorder.

The physical and psychological harms that can arise from this type of content include, for example, disordered eating behaviours and associated physical health issues, as well as emotional distress, and lower confidence and self-esteem.

Eating disorder content is not always shared with malicious intent, as users who share such content may have experience of an eating disorder themselves, and use online spaces to express their feelings, talk about their experiences and seek support. However, even content that is 'recovery focused' can be harmful to children.

#### *User base risk factors:*

Small and large user base sizes can pose risks to children for different reasons. With a larger user base, more children are at risk of encountering this content, while smaller user bases can foster the sharing of niche and/or extreme eating disorder content.

User demographics can play a significant role in the risk of physical or psychological harm that can arise from eating disorder content. Children with mental health difficulties, including but not limited to those with experience of an eating disorder, are both more likely to encounter, and are at greater risk of harm from, this type of content than other users.

While anyone, of any age, can develop an eating disorder, children in their mid to late teens are thought to be particularly vulnerable. There is evidence to suggest that both girls and boys are at risk of harm from eating disorder content, but the type of eating disorder content encountered may vary by gender.

The evidence suggests that an individual's gender, sexual orientation, disability and socio-economic status can also put them at disproportionate risk from eating disorder content.

#### *Service type risk factors:*

Video-sharing services and social media services enable eating disorder content to be disseminated to a large audience. These are services where children can view and engage with such content, both through active searching and recommended content. Discussion forums and chat room services are other online spaces where eating disorder behaviours can be encouraged or promoted. These three service types have therefore been included in the draft Children's Risk Profiles.<sup>334</sup>

---

<sup>334</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.

User connections made on more open spaces can move to messaging services, where less moderation enables conversations to become more explicit and/or harmful.

*Functionalities and recommender systems risk factors:*

Content recommender systems<sup>335</sup> may increase the risk of children encountering eating disorder content, often without their actively searching for it or seeking it out. It can be challenging to distinguish between eating disorder content and recovery content, and eating disorder content can be disguised as content which does not initially appear to be harmful. If a child does engage with eating disorder content, evidence suggests they can be recommended large volumes of eating disorder content which can have a cumulative effect on their wellbeing. Content recommender systems have therefore been included in the draft Children's Risk Profiles.

Eating disorder content can be posted by user profiles with large followings. User groups can create online spaces with users who have similar interests, and group messaging within such spaces can encourage disordered eating behaviours. Due to their role in facilitating communities sharing eating disorder content, these functionalities have been included in the draft Children's Risk Profiles.

Eating disorder content can be found through searching for key terms and code words, making user-generated content searching a risk factor for this harm. Content tagging is a risk factor, as it allows children to search specifically for hashtags linked to eating disorder content, making such content easy to find. Research also suggests that some eating disorder content uses the same hashtags as recovery-focused content, increasing the risk of users unintentionally seeing harmful content. These functionalities are also included in the draft Children's Risk Profiles.

The research suggests that online eating disorder communities are highly engaged and often competitive in nature. This includes users posting content and reacting to content. The evidence suggests that for these users, receiving high levels of engagement with their own eating disorder content can incentivise them to maintain their disorderly eating behaviours, with the risk of these behaviours becoming more extreme. Commenting on content also has the potential to amplify the risk of harm by allowing for further discussion of eating disorders and the promotion of disordered eating behaviours. These functionalities can also interact with recommender systems to further amplify eating disorder content. Posting images and videos as well as commenting on content are included in the draft Children's Risk Profiles.

Other functionalities can also contribute to harm caused by eating disorder content. Being able to post eating disorder content to large networks through user connections may increase the risk of children encountering the content. Encrypted messaging can exacerbate the potential harm, as group messaging exist on many encrypted messaging services where users can share harmful eating disorder content without detection or moderation.

---

<sup>335</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user's normal engagement pattern.

*Business models risk factors:*

Advertising-based models could be a risk factor for this content. Research suggests that children with experience of an eating disorder may be targeted with adverts promoting weight loss programmes and apps, for example.

## Introduction

---

- 7.3.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by content which encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder on U2U services ('risk of harm').<sup>336</sup> This kind of content has been designated as primary priority content that is harmful to children.
- 7.3.2 We use the term 'eating disorder content' throughout this section to refer to such content.
- 7.3.3 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section 7) within this volume. 'Harm' means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.3.4 Eating disorders are serious and complex mental health conditions where disordered eating behaviour is used to cope with feelings and situations. Anyone of any age can develop an eating disorder, but the teenage years are thought to present particular vulnerabilities.<sup>337</sup>
- 7.3.5 In the draft Guidance on Content Harmful to Children (Section 8.5), later in this volume, we provide guidance on identifying eating disorder content, including examples of what Ofcom considers to be, or considers not to be, eating disorder content. Examples of eating disorder content include content that promotes highly restrictive or disordered eating behaviours; tips and advice encouraging eating disorders such as how to conceal them; and content motivating children to persevere with disordered eating behaviours. However, there are important nuances that services should consider in understanding eating disorder content, particularly relating to content that appears to be recovery focused but may contain characteristics that can be harmful to children. See 'Guidance on eating disorder content' (Section 8.5) for more detail and contextual considerations on identifying this content.
- 7.3.6 Some of the evidence described in this section relates to content which may be broader than the definition in the Online Safety Act 2023 ('the Act') or the examples set out in the draft Guidance on Content Harmful to Children (Section 8.5). Where such evidence has been included, it is because we think it is relevant to understanding the risk of harm from eating disorder content.
- 7.3.7 There are ethical and legal limitations in conducting research into this type of content with children, so the research has often relied on qualitative information. To build Ofcom's evidence base on these harms, we commissioned in-depth research into

---

<sup>336</sup> Section 61(5) of the Online Safety Act 2023.

<sup>337</sup> NHS, 2023. [Overview – Eating disorders](#). [accessed 7 February 2024]. Subsequent references to this source throughout.



children’s experiences of encountering suicide, self-harm and eating disorder content, as part of our preparations for regulation (see footnote for sample details).<sup>338</sup> The findings from this research are noted, where relevant, throughout. However, we have also considered the wider landscape of the evidence available.

## How eating disorder content manifests online

---

- 7.3.8 This sub-section looks at how eating disorder content manifests online and how children may be at risk of harm.
- 7.3.9 Eating disorder content can take the format of short-form media, such as videos and images.<sup>339</sup> As explored in the sub-section ‘Service Type’ within this section, this is primarily found on large services such as video-sharing and social media services.
- 7.3.10 Eating disorder content can also be found on smaller services such as websites and blogs. These can be dedicated services that promote eating disorders and can include chat forums which enable users to connect.<sup>340</sup>
- 7.3.11 The content is often glamourised, artistic, and competitive in nature, promoting disordered eating and associated behaviours (most commonly relating to anorexia but also including disorders such as bulimia and binge-eating) as lifestyle choices.<sup>341</sup> Instructions for maintaining an eating disorder are commonplace, alongside motivational material in the form of images and quotes.<sup>342</sup>

---

<sup>338</sup> This study involved speaking with 31 children and young people (between 13-21 years old) who had encountered this content online. This sample included some who had lived experience of eating disorders, self-harm or suicidal ideation, anxiety and depression (14 participants). The study also included interviews with 10 stakeholders who work with children and young adults aged 13-18 in a safeguarding capacity. Source: Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#). Subsequent references to this report throughout.

<sup>339</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>340</sup> This source is among young adults aged 18-23. Source: Bardone-Cone, A. and Cass, K., 2007. [What Does Viewing a Pro-Anorexia Website Do? An Experimental Examination of Website Exposure and Moderating Effects](#). [accessed 7 July 2023]. Subsequent references to this report throughout; EU Kids Online reported that in 2011, 10% of 11–16-year-olds had seen pro-anorexic sites. Source: LSE Research Online (Livingstone, S., Haddon, L., Gorzig, A. and Olafsson, K.), 2011. [EU Kids Online: final report](#). [accessed [accessed 7 February 2024]; This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where’s the harm? A research study on the risks of pro-anorexia websites](#). [accessed 13 February 2024]. Subsequent references to this report throughout; Ofcom, 2024. [One Click Away: a study on the prevalence of non-suicidal self injury, suicide, and eating disorder content accessible by search engines](#).

<sup>341</sup> Syed-Abdul, S., Fernandez-Luque, L., Jian, W., Li, Y., Crain, S., Hsu, M., Wang, Y., Khandregzen, D., Chuluunbaatar, E., Nguyen, P. and Liou, D., 2013. [Misleading Health-Related Information Promoted Through Video-Based Social Media: Anorexia on YouTube](#). [accessed 7 February 2024]. Subsequent references to this report throughout; Branley, D. and Covey, J., 2017. [Pro-ana versus Pro-recovery: A Content Analytic Comparison of Social Media Users’ Communication about Eating Disorders on Twitter and Tumblr](#). [accessed 12 February 2024]. Subsequent references to this report throughout; Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>342</sup> Branley, D. and Covey, J., 2017. [Pro-ana versus Pro-recovery: A Content Analytic Comparison](#); Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

- 7.3.12 There is evidence that some users actively encourage disordered eating behaviours in other users online, including children.<sup>343</sup> Some of these users may not be acting with malicious intent, as they themselves may be experiencing an eating disorder, and their harmful behaviour is a product of their belief that disordered eating is a lifestyle choice. However, there is evidence to suggest that some of these users are proactively targeting children with the intent of sexual exploitation and abuse. Refer to sub-section ‘User Communication: Direct Messaging’ within this section for more information.
- 7.3.13 The evidence suggests that children can find it difficult to distinguish between some lifestyle content and eating disorder content, particularly when they encounter it through fashion, music, or fitness influencers. Children and young adults aged 13-21 participating in Ofcom research described how the lines between this content were blurred, and younger children in particular (aged 13-15) were often confused about the intentions of those posting the content.<sup>344</sup> Refer to the draft Guidance on Content Harmful to Children (Section 8.5) within this volume for more information on eating disorder content. Refer to the Non-Designated Content section (Section 7.9) within this volume for more information on body-image content.

## Presence

- 7.3.14 The evidence suggests that more than one in ten children encounter eating disorder content each month. For example, Ofcom’s Online Experiences Tracker found that 15% of UK internet users aged 13-17 had experienced content relating to eating disorders in a four week period.<sup>345</sup> EU Kids Online 2020 reported that 12% of 12-16-year-olds had seen content about ‘ways to be very thin’ (such as being anorexic or bulimic, or ‘thinspiration’) at least monthly in the past year, rising to 33% who said they had seen it a few times in the past year.<sup>346</sup>
- 7.3.15 Eating disorder content should be understood in the context of the growing number of children struggling with an eating disorder or disordered eating behaviours. It has been estimated that 1.25 million people in the UK have an eating disorder,<sup>347</sup> and the NHS has reported treating a record number of children and young people. Almost 10,000 children and young people started treatment between April and December 2021, up by almost two-thirds since before the pandemic.<sup>348</sup> There are known barriers to seeking and receiving treatment for an eating disorder, particularly for lesser-known or under-studied eating disorders such as avoid/restrictive food intake disorder (ARFID) or binge-eating

---

<sup>343</sup> These users are known as ‘anorexia coaches’, ‘ana buddies’ or a similar equivalent. ‘Coaching’ can include requesting pictures and videos for ‘body checks’, weekly weigh-ins and enforcing strict rules about what food to eat and avoid. It can also include ‘punishment’ for not complying in the form of verbal abuse, and sometimes requesting sexual images. Source: Sukunesan, S., 2021. [‘Anorexia coach’: sexual predators online are targeting teens wanting to lose weight. Platforms are looking the other way.](#) The Conversation, 25 July. [accessed 14 February 2024]. Subsequent references to this source throughout.

<sup>344</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>345</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>346</sup> EU Kids Online (Smahel, D., Machackova, H., Mascheroni, G., Dedkova, L., Staksrud, E., Olafsson, K., Livingstone, S., Hasebrink, U.), 2020. [EU Kids Online 2020.](#) [accessed 14 February 2024]. Subsequent references to this report throughout.

<sup>347</sup> Beat, 2023. [How many people in the UK have an eating disorder?](#) [accessed 7 February 2024].

<sup>348</sup> This source does not give the age range for ‘children and young people’. Source: NHS, 2022. [NHS treating record number of young people for eating disorders.](#) [accessed 7 February 2024].

disorder, therefore it is likely that the number of people receiving treatment for an eating disorder is an under-representation of those experiencing an eating disorder.<sup>349</sup>

## Impacts

- 7.3.16 The evidence highlights a number of risks of harm to children from eating disorder content. These can include the exacerbation and glamourisation of disordered eating, a range of negative emotions such as guilt, shame and fear, and increased vulnerability to sexual exploitation. While individual encounters with eating disorder content can affect children, many of the impacts below arise from cumulative harm.<sup>350</sup>
- 7.3.17 Encountering eating disorder content has been linked to exacerbating eating disorder behaviours, particularly among children with experience of an eating disorder.<sup>351</sup> The potential impacts of developing an eating disorder are severe, including acute malnutrition, family dysfunction, relationship breakdown and death.<sup>352</sup> The eating disorder anorexia nervosa is thought to have the highest mortality rate of any psychiatric illness.<sup>353</sup>
- 7.3.18 Studies have indicated that, for children with experience of eating disorders, engagement with eating disorder content worsened their illness.<sup>354</sup> Research commissioned by the Department for Digital, Culture, Media and Sport (DCMS) reported that girls aged 9-18, and parents of children with eating or body-image disorders, partly attributed the development and exacerbation of their illness to the body-image or eating disorder content they had seen online.<sup>355</sup> This content can also encourage eating disorders by leading to competitive behaviours. The research commissioned by DCMS also reported girls trying to eat less or exercise more than what they had seen online.
- 7.3.19 Some eating disorder content can teach users how to sustain an eating disorder. In Ofcom research, 13-21-year-olds described encountering content that provided ideas about how

---

<sup>349</sup> Beat, 2017. [Delaying for years, denied for months](#). [accessed 12 February 2024].

<sup>350</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Register (Section 7 of this volume).

<sup>351</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 13 February 2024]. Note: DCMS stands for the UK Government department, 'Department for Digital, Culture, Media & Sport'. This has now been replaced by 'Department for Science, Innovation and Technology' (DSIT) and 'Department for Culture, Media and Sport' (DCMS). Subsequent references to this report throughout; Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>352</sup> Children's Commissioner, 2023. [Young people with eating disorders in England on the rise](#). [accessed 13 February 2024]. Subsequent references to this source throughout.

<sup>353</sup> Eating Disorder Hope, 2023. [Anorexia Nervosa – Highest Mortality Rate of Any Mental Disorder: Why?](#) [accessed 13 February 2024].

<sup>354</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>355</sup> This research defines body-image content as "content that promotes or could give rise to unhealthy or negative body image and associated behaviours". The description of content includes content that promotes "skipping meals or consuming an extremely low daily calorie intake". It also refers to "body-image content being easy to find by using well-known hashtags, which took users through to posts promoting anorexia and other disordered eating". It is therefore likely that the definition of body-image content in this research is inclusive of some eating disorder content. Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

to restrict their diet.<sup>356</sup> A US study of 12-22-year-olds with an eating disorder similarly found that many users of eating disorder websites learned about and used new techniques from these sites.<sup>357</sup>

- 7.3.20 The risk of harm of exacerbating disordered eating behaviours is not unique to children with experience of an eating disorder. An NSPCC briefing reported that exposure to eating disorder content had affected children without pre-existing eating disorders, with some children telling Childline they felt *“envious of the physiques being portrayed in this content, to the point that they’d considered unhealthy eating habits”*.<sup>358</sup>
- 7.3.21 Eating disorder content can have psychological impacts on children, regardless of their experience with eating disorders. An Internet Matters survey found that, of the 6% of 9-16-year-olds who had come across ‘content which promotes dangerous eating habits’, 43% said it had a ‘high affect’ on them.<sup>359</sup> Ofcom research similarly found that children and young adults aged 13-21 reported feelings of anxiety, shame, guilt and fear as a result of encountering eating disorder content online.<sup>360</sup>
- 7.3.22 Psychological impacts can affect children’s online behaviour. Research commissioned by DCMS reported that seeing body-image and eating disorder content damaged the self-confidence and self-esteem of children and young adults aged 9-18, and made them feel self-conscious about posting online.<sup>361</sup>
- 7.3.23 Evidence suggests that the frequency with which children are encountering eating disorder content is making eating disorders seem normal.<sup>362</sup> Ofcom’s research reported that some children and young adults aged 13-21 feel they have become desensitised to the gravity of the issue, due to the content they have seen. They explained how some influencers and celebrities have contributed to this desensitisation by popularising eating disorders and associating the issue with glamorous lifestyles.<sup>363</sup> Desensitisation presents a risk of harm, as it can contribute to children believing that encountering harmful content is a normal part of their everyday life.
- 7.3.24 The risk of harm from eating disorder content may have been amplified during the Covid-19 pandemic, the impact of which may still be being felt by children today. Research

---

<sup>356</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>357</sup> Note: Survey results were from 182 individuals: 76 patients who were diagnosed with an eating disorder at Stanford between 1997 and 2004, and 106 parents of these. Source: Wilson, J., Peebles, R. and Hardy, K., 2007. [Surfing for Thinness: A Pilot Study of Pro-Eating Disorder Web Site Usage in Adolescents With Eating Disorders](#). [accessed 13 February 2024].

<sup>358</sup> NSPCC, 2022. [Children’s experiences of legal but harmful content online](#). [accessed 13 February 2024]. Subsequent references to this report throughout.

<sup>359</sup> Internet Matters, 2022. [Insights from Internet Matters tracker survey](#) [accessed 22 February 2024].

<sup>360</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>361</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>362</sup> Ofcom research found that the children and young people taking part in the research had experienced multiple and regular encounters with eating disorder content. Those with experience of an eating disorder were encountering more graphic content more frequently. Source: Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>363</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

commissioned by DCMS reported that during the Covid-19 lockdowns children spent more time on social media and had limited opportunities to engage with broader representations of body image or lifestyle.<sup>364</sup> This may have contributed to concerns around increased rates of eating disorders among children and young people due to the impact of the pandemic.<sup>365</sup>

- 7.3.25 Eating disorder content can make children vulnerable to sexual exploitation. Evidence suggests that perpetrators of child sexual exploitation and abuse are targeting children with the intention of sexual exploitation through eating disorder content by posing as ‘anorexia coaches’. Refer to sub-section ‘User Communication: Direct Messaging’ within this section for more information.

## Evidence of risk factors on user-to-user services

---

- 7.3.26 We consider that the risk factors below may increase the risk of harm to children from eating disorder content. This is summarised in the grey box at the start of the section.

### Risk factors: User base

#### User base size

- 7.3.27 Both large and small services pose risks in relation to eating disorder content, for different reasons.
- 7.3.28 Eating disorder content can appear on large services, such as social media and video-sharing services with large user bases.<sup>366</sup> Here, the larger user base increases the likelihood of more child users encountering harmful content, particularly where the content receives substantial amounts of engagement and is amplified through recommender systems. Refer to sub-sections ‘User Communication: Commenting on Content’ and ‘Recommender Systems’ within this section for more information.
- 7.3.29 Eating disorder content also appears on smaller services, such as websites and blogs dedicated to promoting eating disorders. On such services, the smaller user base can foster the sharing of more extreme content. For example, as outlined above, these services can enable users to join ‘group fasts’, find instructions for maintaining an eating disorder and be paired with an online user who will encourage their disordered eating behaviours.<sup>367</sup>

---

<sup>364</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>365</sup> Royal College of Paediatrics and Child Health issued warnings of increased cases of eating disorders among children, which they attributed to the impact of the pandemic. Source: Royal College of Paediatrics and Child Health, 2020. [Paediatricians warn parents to be alert to signs of eating disorders over holidays](#). [accessed 13 February 2024].

<sup>366</sup> Center for Countering Digital Hate, 2022. [Deadly by Design](#); Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#); Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>367</sup> This source is among young adults aged 18-23. Source: Bardone-Cone, A. and Cass, K. 2007. [What Does Viewing a Pro-Anorexia Website Do?](#); This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where’s the harm?](#)

## User demographics

- 7.3.30 The following sub-section outlines key evidence on user base demographic factors and risks of harm to children, which can include protected characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.
- 7.3.31 While anyone, of any gender, ethnicity or background, can develop an eating disorder at any age, or be affected by eating disorder content, evidence suggests that user base characteristics including the **age, gender, sexual orientation and gender identity, disability, physical/mental health** and **socio-economic factors** of users could lead to an increased risk of harm to children.

### Age

- 7.3.32 Evidence suggests that children in their mid to late teens (13-17) are particularly at risk of harm from eating disorder content, both because they are more likely to develop an eating disorder at this age – and are therefore particularly vulnerable to harm from eating disorder content – and they are more likely to encounter eating disorder content online.
- 7.3.33 Teenagers are at higher risk than younger children of developing an eating disorder. The NHS guidance states that children aged 13-17 are the most affected by eating disorders.<sup>368</sup> Research by the Eating Disorders Genetics Initiative also concluded that eating disorders have a common onset during the transitional period from adolescence into young adulthood.<sup>369</sup>
- 7.3.34 There is also some evidence that the risk of children encountering eating disorder content increases with age, with children aged 14-16 particularly at risk of harm. EU Kids Online found that 12% of 12-16-year-olds had seen content about ‘ways to be very thin’ (such as being anorexic or bulimic, or ‘thinspiration’<sup>370</sup>) at least monthly in the past year; this was slightly higher among children aged 15-16 (15%) than children aged 12-14 (9%).<sup>371</sup> Research commissioned by DCMS also reported that professionals working with children believe that body image issues mainly emerge among 14-16-year-old girls, and this is exacerbated by the content they see online.<sup>372</sup>

### Gender

- 7.3.35 Anyone, of any gender, can develop an eating disorder. However, there is some evidence to suggest that girls may be particularly at risk of harm from eating disorder content due to the higher proportion of girls with eating disorders.<sup>373</sup> NHS figures show that between 2020 and 2021, of the 11,700 hospital admissions for eating disorders in people aged

---

<sup>368</sup> Anorexia nervosa, bulimia and binge-eating disorder are the most common eating disorders. Anorexia typically starts in the mid-teens; bulimia is more common in those aged 15 to 25 and binge-eating disorder often starts when people are in their 20s or over. Source: NHS, 2023. [Overview – Eating disorders](#).

<sup>369</sup> Davies, H., Kelly, J., Ayton, A., Hubel, C., Bryant-Waugh, R., Treasure, J. and Breen, G., 2021. [When do eating disorders start? An investigation into two large UK samples](#). [accessed 14 February 2024].

<sup>370</sup> Refer to the draft Guidance on Content Harmful to Children (section 8.5) within this volume for more information on ‘thinspiration’ content.

<sup>371</sup> The difference between children aged 15-16 and 12-14 has not been significance tested due to limited public availability of base sizes. Source: EU Kids Online, 2020. [EU Kids Online 2020](#).

<sup>372</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>373</sup> Anorexia is most common in young women and typically starts in the mid-teens. Source: NHS, 2023. [Overview – Anorexia](#). [accessed 14 February 2024].



under 25, 10,800 were women and girls.<sup>374</sup> As discussed in the sub-section ‘Impacts’, while eating disorder content is harmful to all children, it is particularly harmful to children with experience of eating disorders.

- 7.3.36 The higher proportion of girls struggling with eating disorders should not overshadow the increasing number of boys struggling with disordered eating, who may therefore be at heightened risk of harm from eating disorder content. Evidence suggests that between a quarter and a third of those affected by an eating disorder are male.<sup>375</sup> NHS figures also showed that hospital admissions for eating disorders for boys and young men aged under 25 between 2020 and 2021 had doubled since the previous year.<sup>376</sup> Eating disorders are heavily gendered and often associated with ‘femininity’, so men can be less likely to view themselves as having an eating disorder, and those around them (including health professionals) can be less likely to suspect one.<sup>377</sup> Men also face increased stigma relating to eating disorders, which can reduce their willingness to seek help and access treatment.<sup>378</sup> There is therefore thought to be an under-reporting of male eating disorders in reported health statistics.
- 7.3.37 There is evidence to indicate that girls are more likely than boys to see eating disorder content regularly. EU Kids Online found that 12% of 12-16-year-olds had seen content about ‘ways to be very thin’ (such as being anorexic or bulimic, or ‘thinspiration’) at least monthly in the past year, and this was slightly higher among girls (15%) than boys (9%).<sup>379</sup> Research commissioned by DCMS also found that teenage girls were considered to be at greater risk than boys of seeing and being influenced by body-image and eating disorder content.<sup>380</sup>
- 7.3.38 Overall, evidence exploring boys’ exposure to, or harm from, eating disorder content is more limited. However, there is some evidence to suggest that some eating disorder content is engaged with more by boys and can have similar impacts in terms of encouraging disordered eating behaviours. Eating disorder content focusing on extreme fasting has been found to particularly appeal to male users (including children) and offer space to discuss weight loss and starvation practices separate from the majority of eating disorder content that is perceived by some to focus on the experience of women and girls.<sup>381</sup> This type of content tends to embody traditionally masculine tropes of strength,

---

<sup>374</sup> Children’s Commissioner, 2023. [Young people with eating disorders in England on the rise](#).

<sup>375</sup> Evidence suggests that males comprise approximately 1 in 4 presentations of bulimia nervosa and anorexia nervosa. Source: Gorrell, S. and Murray, S., 2019. [Eating Disorders in Males](#). [accessed 8 December 2023]; Beat reports that 25% of those affected by an eating disorder are male. Source: Beat, 2023. [How many people in the UK have an eating disorder?](#) [accessed 8 December 2023]; the National Eating Disorders Association reports that one in three people struggling with an eating disorder is male. Source: National Eating Disorders Association, 2023. [Eating Disorders in Men and Boys](#). [accessed 7 February 2024].

<sup>376</sup> Children’s Commissioner, 2023. [Young people with eating disorders in England on the rise](#).

<sup>377</sup> Beat, 2023. [Do men get eating disorders?](#) [accessed 9 February 2024].

<sup>378</sup> Coopey, E. and Johnson, G., 2022. [“The male elephant in the room”: a qualitative evidence synthesis exploring male experiences of eating disorders](#). [accessed 9 February 2024].

<sup>379</sup> EU Kids Online, 2020. [EU Kids Online 2020](#).

<sup>380</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>381</sup> Examples of restrictive eating content include extreme fasting content and ‘One Meal a Day’. While such content may not always fall within scope of eating disorder content, some examples display harmful eating behaviours such as the depiction of a 16-day fast, which saw the user lose a large amount of weight and experience other side effects common to starvation, such as hair loss. This research was a content analysis and



control and discipline, and has been linked to a male influencer, well-known for self-proclaimed misogynistic views.<sup>382</sup> This content could therefore risk acting as a pathway to misogynistic online spaces.

### *Sexual orientation and gender identity*

- 7.3.39 While there is limited specific evidence of LGBTQIA+ children’s experiences of eating disorder content, the evidence that is available indicates that LGBTQIA+ children are likely to be disproportionately at risk of disordered eating, which may put them at higher risk of harm from encountering eating disorder content. A literature review into eating disorders in the LGBT population concluded that LGBT youth engaged in disordered eating behaviours, such as purging, fasting, dieting with the intention of weight loss, and taking diet pills at higher rates than their heterosexual or cisgendered peers.<sup>383</sup> The study linked this to the impact of several stressors, including stigma, discrimination, internalised homophobia and concealment of identity.
- 7.3.40 LGBTQIA+ children may also be at increased risk of encountering eating disorder content. Ofcom’s Online Experiences Tracker found that, among adult internet users, LGBTQI+ users were more likely to have seen eating disorder content: 8% of UK internet users aged 18+ had seen or experienced content relating to eating disorders in a four week period and this tended to be higher among bisexual (21%) participants, those who noted ‘other sexuality’ (16%) and non-binary participants (24%).<sup>384</sup>

### *Disability*

- 7.3.41 The evidence suggests that children with some disabilities are more likely to encounter eating disorder content. A study by Internet Matters found that 15% of 11-17-year-olds with speech difficulties, and 14% of autistic 11-17-year-olds, had ‘often’ seen eating disorder content, compared to 5% of children the same age without any vulnerabilities.<sup>385</sup>
- 7.3.42 Certain groups are more at risk of developing eating disorders. Autistic children may be at greater risk of developing an eating disorder. PEACE (Pathway for Eating disorders and Autism from Clinical Experience) reported that an estimated 35% of people suffering from an eating disorder also have autism or ‘high autistic features’.<sup>386</sup> While these are very different conditions, PEACE explains that the correlation may be due to similarities in the

---

does not specify the presence of UK child users. Evidence accessed by Ofcom but not yet publicly available. Source: Lavis, A. and Aziz, J. 2023. ‘Borderline’ Restrictive Eating Content on Social Media: What is Harmful and to Whom? [accessed 6 October 2023]. Subsequent references to this report throughout.

<sup>382</sup> Evidence accessed by Ofcom but not yet publicly available. Source: Lavis, A. and Aziz, J. 2023. ‘Borderline’ Restrictive Eating Content on Social Media.

<sup>383</sup> Parker, L. and Harriger, J., 2020. [Eating disorders and disordered eating behaviors in the LGBT population: a review of the literature](#). [accessed 9 February 2024].

<sup>384</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>385</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; ‘I worry about life at home’; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; ‘English is not my first language’. Source: Internet Matters (Katz, A. and El Asam, A.), 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#). [accessed 9 February 2024]. Subsequent references to this report throughout.

<sup>386</sup> This source does not specify the age range of those included. Source: PEACE, 2023. [What is an eating disorder?](#) [accessed 9 February 2024].

way individuals with these conditions process social and emotional information.<sup>387</sup> Research by Beat also reported that avoidant/restrictive food intake disorder (ARFID) can often occur alongside autism.<sup>388</sup> There is limited evidence on autistic children's experiences of encountering eating disorder content online, but it is reasonable to assume that autistic children may also be at heightened risk of harm from this type of content. Refer to sub-section 'Impacts' within this section for more information.

### *Physical/mental health*

- 7.3.43 Children with mental and physical health conditions may be at heightened risk of harm from eating disorder content in a number of ways.
- 7.3.44 Specifically, those with an eating disorder are more likely to report encountering eating disorder content online.<sup>389</sup> A study exploring life online for vulnerable children found that 31% of children aged 11 to 17 with an eating disorder had 'often' seen eating disorder content online, compared to 5% of those without any vulnerabilities.<sup>390</sup> Ofcom research also found that children and young adults aged 13-21 with experience of an eating disorder were more likely to see more graphic eating disorder content, and see it more frequently.<sup>391</sup>
- 7.3.45 Children with other mental health difficulties are also more likely to be exposed to and harmed by eating disorder content. Ofcom's research found that children and young adults aged 13-21 with experience of certain mental health conditions were more likely to seek, share and post their own content.<sup>392</sup> A study exploring life online for vulnerable children also found that 19% of those aged 11-17 with mental health difficulties 'often' saw eating disorder content, compared to 5% of those without any vulnerabilities.<sup>393</sup>
- 7.3.46 Poor physical health may also increase the risk of encountering eating disorder content. The same report, exploring life online for vulnerable children, noted that 18% of children

---

<sup>387</sup> The source uses anorexia nervosa as an example and explains how people with autism and anorexia nervosa often have difficulty in identifying and describing their own emotions. Both conditions are also associated with difficulties in understanding non-verbal communication such as facial expression, body language, and tone of voice, which can it sometimes result in confusion and anxiety in social situations. Source: PEACE, 2023. [Similarities in Social and Emotional Functioning in Anorexia and Autism](#). [accessed 9 February 2024].

<sup>388</sup> Beat, 2023. [What is Avoidant/Restrictive Food Intake Disorder?](#) [accessed 9 February 2024].

<sup>389</sup> Social Finance, 2022. [Social media, psychological harm and violence among young people](#). [accessed 9 February 2024].

<sup>390</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; 'I worry about life at home'; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; 'English is not my first language'. Source: Internet Matters, 2021. [Refuge and Risk](#).

<sup>391</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>392</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>393</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; 'I worry about life at home'; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; 'English is not my first language'. Source: Internet Matters, 2021. [Refuge and Risk](#).

aged 11-17 with a long-term physical illness had ‘often’ seen eating disorder content (compared to 5% of those without any vulnerabilities).<sup>394</sup>

### *Socio-economic factors*

- 7.3.47 While not specifically related to online eating disorder content, evidence suggests that periods of financial strain may amplify disordered eating behaviours and put certain groups of children at increased risk of harm from eating disorder content. Research has shown that low-income groups living with food insecurity (such as having to miss meals due to the cost of food, or being limited to certain low-cost foods) are at significantly higher risk of eating disorders, and periods of financial strain may put further pressure on this.<sup>395</sup> Those with experience of an eating disorder may be especially at risk. Beat explained how food insecurity can make eating disorder behaviours worse for people who are already vulnerable, or contribute to a relapse for those in recovery.<sup>396</sup>
- 7.3.48 The evidence suggests that children with low socio-economic backgrounds are more likely to encounter eating disorder content online. The report, exploring life online for vulnerable children, noted that young carers (13%) and those who worry about life at home (15%) were more likely to ‘often’ see eating disorder content than children without any vulnerabilities (5%).<sup>397</sup>

## Risk factors: Service types

- 7.3.49 Research suggests that children are at an increased risk of encountering eating disorder content on the following service types: **social media services, video-sharing services, messaging services, discussion forums and chat room services**. A U2U service may contain more than one service type.

### Service type

#### *Social media services and video-sharing services*

- 7.3.50 The evidence suggests that children encounter eating disorder content on social media services and video-sharing services. These types of services can use content recommender systems to allow content (particularly images and videos) to be rapidly shared and recommended to large audiences, and potentially seen by a large number of children. Refer to sub-section ‘Recommender Systems’ within this section for more information.

---

<sup>394</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; ‘I worry about life at home’; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; ‘English is not my first language’. Source: Internet Matters, 2021. [Refuge and Risk](#).

<sup>395</sup> Lowe, R. and Mahmood, H., 2022. [Why preventing food insecurity will support the NHS and save lives](#). NHS Confederation, 21 October. [accessed 9 February 2024].

<sup>396</sup> Evidence taken from a direct quote from Beat's Director of External Affairs. Source: Smith, S., 2022. [How the cost of living crisis is fuelling a rise in eating disorders](#). Dazed Digital, 20 October. [accessed 9 February 2024].

<sup>397</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; ‘I worry about life at home’; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; ‘English is not my first language’. Source: Internet Matters, 2021. [Refuge and Risk](#).

- 7.3.51 Children and young adults aged 13-21 in Ofcom’s research said that eating disorder content was prolific on a range of social media services.<sup>398</sup> Research commissioned by DCMS with children and young adults aged 9-18 also reported that body-image and eating disorder content was often seen on social media.<sup>399</sup>
- 7.3.52 Ofcom research found that eating disorder content was present on video-sharing services.<sup>400</sup> Several studies found that video-sharing services were hosting and recommending eating disorder content, presenting the risk that children using the service could encounter this content. The Center for Countering Digital Hate used avatars to investigate recommender systems and found hashtags relating to eating disorders with over 13.2 billion views.<sup>401</sup> A study investigating anorexia-related misinformation disseminated through video-based social media found that, of all the anorexia-related videos on the platform studied as part of the research, 29.3% were rated as ‘pro-anorexia’.<sup>402</sup> Refer to sub-section ‘Risk factors: Functionalities and recommender systems’ within this section for more information.

### *Messaging services*

- 7.3.53 The evidence suggests that children may encounter eating disorder content on messaging services.<sup>403</sup> Content shared in more private contexts can be more extreme; for example, when shared in group chats (refer to sub-section ‘User Communication: Group Messaging’ within this section for more information). Eating disorder content can also be shared in the context of one-to-one exchanges, for example between ‘anorexia coaches’ and vulnerable children (refer to sub-section ‘User Communication: Direct Messaging’ within this section for more information), and in encrypted environments that make moderation more challenging.<sup>404</sup>

---

<sup>398</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>399</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>400</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>401</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. The hashtags relating to eating disorders contained some healthy discussion of eating disorders, as well as harmful pro-eating disorder videos. Source: Center for Countering Digital Hate, 2022. [Deadly by Design](#). [accessed 9 February 2024]. Subsequent references to this report throughout.

<sup>402</sup> Three doctors reviewed 140 videos with approximately 11 hours of video content, classifying them as ‘informative’, ‘pro-anorexia’, or ‘others’. ‘Pro-anorexia’ was defined as videos promoting anorexia as a fashion or a source of beauty, and which share tips and methods for becoming and remaining anorexic. Source: Syed-Abdul, S. et al., 2013. [Misleading Health-Related Information Promoted Through Video-Based Social Media](#).

<sup>403</sup> Research from Ofcom and 5Rights has found that eating disorder content has been encountered by children on encrypted messaging services. Source: 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk](#). [accessed 9 February 2024]. Subsequent references to this report throughout; Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>404</sup> Marsh, S., 2019. [‘Anorexia coaches’ on Kik app prey on people with eating disorders](#). The Guardian, 1 March. [accessed 27 February 2024].

### *Discussion forums and chat room services*

- 7.3.54 Discussion forums and chat-room services are spaces in which children can encounter eating disorder content. These spaces can allow users to share eating disorder content in dedicated communities which they may perceive as self-regulating. Ofcom’s research found that eating disorder content was shared in online forums; children and young adults aged 13-21 described using one particular discussion forum because they perceived sub-forums to be self-regulating with little perceived outside moderation.<sup>405</sup>
- 7.3.55 Children can be led to discussion forums and chat rooms from other services, which can allow them to further explore and encounter more extreme eating disorder content. For example, pro-eating disorder websites and blogs can often contain discussion forums or chat rooms, which can enable users to communicate, join ‘group fasts’, find information about maintaining an eating disorder and be paired with an online user who will encourage their disordered eating behaviours.<sup>406</sup> An Ofcom study described the experience of a 16-year-old girl who was introduced by a friend to a pro-anorexia community online on a blogging website.<sup>407</sup>
- 7.3.56 This service type can pose particular risks because some online eating disorder forums contain eating disorder content that can be intentionally disguised as recovery-focused. This risks both the harmful content evading moderation, and users seeking recovery content unintentionally being exposed to harmful content. Beat described how an online forum, which had almost half a million users, appeared to be a supportive community for those living with an eating disorder, but was actually a site populated by predominately pro-eating disorder discussions that provided encouragement and instructions for continued weight loss.<sup>408</sup>
- 7.3.57 Generative artificial intelligence (GenAI) models can create eating disorder content, which can be shared in discussion forums and be encountered by children. Research from the Center for Countering Digital Hate compiled a set of prompts informed by research into eating disorder content and found that 41% of AI tools, 23% of AI chatbots and 32% of AI image generators generated eating disorder content in response.<sup>409</sup> The research also reported that users of an eating disorder forum with over 500,000 members had shown signs of embracing AI tools to produce eating disorder content and had posted such content on the service.<sup>410</sup> This research does not specify the presence of child users.

---

<sup>405</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>406</sup> This source studied young adults aged 18-23. Source: Bardone-Cone, A. and Cass, K. 2007. [What Does Viewing a Pro-Anorexia Website Do?](#); [accessed 16 April 2024]. This source is a content analysis and does not specify child users. Source: Bond, E. 2012. [Virtually Anorexic – Where’s the harm?](#) [accessed 16 April 2024].

<sup>407</sup> Ofcom, 2022. [Risk factors that may lead children to harm online.](#)

<sup>408</sup> Beat response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation.](#)

<sup>409</sup> Note: The research involved six popular AI platforms, chatbots and image generators, where a set of 20 prompts (informed by research on eating disorders and content found on eating disorder forums) were tested. Whilst some AI chatbots at first blocked advice on disordered eating behaviours, the use of ‘jailbreaks’ (a creative prompt that allows the user to bypass the safety features built into platforms, often in place to prevent the generation of illegal or unethical content) were tested and were seen to circumnavigate safety features on all tested platforms. Source: Center for Countering Digital Hate, 2023. [AI and Eating Disorders: How generative AI is enabling users to generate harmful eating disorder content.](#) [accessed 9 February 2024]. Subsequent references to this report throughout.

<sup>410</sup> Center for Countering Digital Hate, 2023. [AI and Eating Disorders.](#)

## Risk factors: Functionalities and recommender systems

### User identification

#### User profiles

- 7.3.58 Eating disorder content can be encountered via influencer profiles that risk glamourising eating disorders. Ofcom research with 13-21-year-olds reported that children and young adults see influencers as role models and a trusted source,<sup>411</sup> creating a heightened risk of harm if eating disorder content is posted on these accounts. Participants also shared the view that some influencers and celebrities have popularised eating disorder content by associating disordered eating with glamorous lifestyles in their content. These profiles can have a significant number of subscribers or followers (refer to sub-section 'User Networking: User Connections' within this section for more information) and posting content from these profiles has been linked to increased risk both of encountering eating disorder content and normalising it (refer to sub-section 'User Communication: Posting Content' within this section for more information).
- 7.3.59 Creating multiple user profiles can enable children to engage with eating disorder content in less visible ways. Ofcom research found that 58% of children aged 8-17 who have their own profile on an online platform have another profile on the same platform; the most common reason was to have an account that only parents/family can see (23%).<sup>412</sup> Evidence suggests that some of these additional profiles can be used to engage with eating disorder content. This was observed in a study on users' communication about eating disorders on social media.<sup>413</sup> Another study by 5Rights reported a 14-year-old child creating separate accounts to search for eating disorder content so their family and friends wouldn't see it.<sup>414</sup>
- 7.3.60 Evidence suggests that children with experience of an eating disorder are, in some cases, choosing usernames with words related to eating disorders, such as 'anorexia'. The use of such usernames can make these children more likely to encounter eating disorder content because of how they interact with recommender systems. The Center for Countering Digital Hate used avatars to investigate recommender systems and found evidence to suggest that accounts established with a child's age, and a username which indicated a body image-related concern, receive more recommendations for eating disorder and self-harm content than similar accounts without this phrase in the name.<sup>415</sup> Refer to sub-section 'Recommender Systems' within this section for more information.
- 7.3.61 Similarly, user profile information which references a pro-eating disorder mindset can enable the creation of user networks with shared interests, due to recommender systems

---

<sup>411</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>412</sup> Online communication platform refers to the apps/ sites used for messaging/ voice/ video calling, social media, watching or posting content on VSPs, watching or posting live-stream videos. Source: Ofcom, 2023. [Children's Media Literacy Tracker.](#)

<sup>413</sup> The age and location of user accounts was not included in the research. Source: Branley, D. and Covey, J. 2017. [Pro-ana versus Pro-recovery: A Content Analytic Comparison.](#)

<sup>414</sup> 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk.](#)

<sup>415</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Center for Countering Digital Hate, 2022. [Deadly by Design.](#)



recommending accounts with similar profiles.<sup>416</sup> A study investigating pro-eating disorder user profiles aged 15-25 found that profiles that were more clearly pro-eating disorder tended to engage a network that was more concentrated with other pro-eating disorder users.<sup>417</sup> This risks creating an online ‘echo chamber’ where disordered eating behaviours are reinforced. Refer to sub-section ‘Recommender Systems’ within this section for more information.

### *Anonymous user profiles*

7.3.62 The evidence suggests that anonymous user profiles may give users the confidence to share sensitive information, and thereby increase the likelihood of eating disorder content being shared. A study of 126 pro-anorexia websites observed how the anonymity of users’ profiles correlated with the sharing of painful experiences that often, but not exclusively, focused on experiences relating to eating disorders.<sup>418</sup> Anonymous profiles may allow the fostering of emotional connections, and risk strengthening the pro-anorexia identity of users of such communities.

## User networking

### *User connections*

7.3.63 As described above, eating disorder content can be posted from influencer profiles that have a significant number of subscribers or followers (including children). User connections in this context can increase the risk of harm by increasing the number of children who may encounter the content. Refer to sub-section ‘User Communication: Posting Content’ within this section for more information.

7.3.64 The evidence suggests that children with experience of an eating disorder are sharing eating disorder content among their friends and online connections because they have created a network of users with a shared interest in the issue.<sup>419</sup> Ofcom research described the experience of a 16-year-old girl with an eating disorder being introduced to ‘pro-eating disorder’ communities online by a school friend who regularly engaged with pro-anorexia content on a blogging site. The girl believed that because she was friends with this person, she came across more of this type of online content than she would have done otherwise.<sup>420</sup>

### *User groups*

7.3.65 Eating disorder content can also be shared in user groups. User groups can bring together users with mutual interests, and as eating disorder communities may have a competitive element, can result in online spaces where harmful behaviours are encouraged. Ofcom research found an array of online communities distributing and discussing eating disorder

---

<sup>416</sup> A study analysing social media users’ communication about eating disorders found that accounts dedicated to pro-anorexia content had profile information that often included a list of goal weights, and were where many users chose to record their progress. N.B. This research does not specify the age or location of users included in the analysis. Source: Branley, D. and Covey, J., 2017. [Pro-ana versus Pro-recovery: A Content Analytic Comparison](#).

<sup>417</sup> Arseniev-Koehler, A., Lee, H., McCormick, T. and Moreno, M., 2016. [#Proana: Pro-Eating Disorder Socialization on Twitter](#). [accessed 9 February 2024].

<sup>418</sup> This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where’s the harm?](#)

<sup>419</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>420</sup> Ofcom, 2022. [Risk factors that may lead children to harm online](#).



content; these communities included open and closed groups on social media and discussion forum services, and groups on messaging services.<sup>421</sup> An NSPCC briefing on insights from Childline helplines also reported that children with experience of an eating disorder were actively seeking eating disorder content through such groups.<sup>422</sup>

- 7.3.66 User groups centred on eating disorder content risk harmful content and information being easily disseminated among group participants, including children. Ofcom research found that children and young adults aged 13-21 with experience of an eating disorder were more likely to belong to eating disorder groups or communities online.<sup>423</sup> The research also reported that, while it was not always clear from the children and young adults how code-words relating to eating disorder content became known, there was a sense that these were often shared within online groups formed around the issue. Refer to sub-section 'Content Exploring: Content Tagging' within this section for more information.<sup>424</sup>

## User communication

### *Direct messaging*

- 7.3.67 Direct messaging can be used by online users who actively encourage disordered eating behaviours in other users online, including children.<sup>425</sup> Evidence from an investigative journalism article suggested that the initial connection can be made via posts, or comments on posts, on social media services, with communication then moving to direct messaging so that it occurs in a closed online space.<sup>426</sup>
- 7.3.68 There is evidence to suggest that perpetrators of child sexual exploitation and abuse ('CSEA') are deliberately targeting children with the intent of sexual exploitation. An exploratory study into the vulnerability of children to human trafficking reported on a number of criminal and investigative journalism cases (across the UK, the Netherlands and Germany) where CSEA perpetrators were posing as 'anorexia coaches' to exploit sexual images and acts from young women and girls.<sup>427</sup> Direct messaging was used to build a relationship between the 'coach' and child or young adult, and the dependency and loyalty they felt towards their 'coach' was noted as contributing to the exploitation. Children with experience of an eating disorder who connect with 'anorexia coaches' are therefore at greater risk of harm of sexual abuse. Refer to the [Illegal Harms Register](#) within our [Illegal Harms Consultation](#) (see CSEA section).

---

<sup>421</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>422</sup> NSPCC, 2022. [Children's experiences of legal but harmful content online](#).

<sup>423</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>424</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>425</sup> These users are known as 'anacoaches', 'pro-ana coaches' and 'ana buddies'. 'Coaching' can include requesting pictures and videos for 'body checks', weekly weigh-ins and enforcing strict rules about what food to eat and avoid. It can also include 'punishment' for not complying, in the form of verbal abuse, and sometimes requesting sexual images. Source: Sukunesan, S., 2021. ['Anorexia coach': sexual predators online are targeting teens wanting to lose weight](#). The Conversation, 25 July.

<sup>426</sup> Knox, M., 2019. [How anorexic kids as young as 13 are meeting 'ana buddies' online and helping each other starve](#), The Sun, 29 April. [accessed 20 December 2023]. Subsequent references to this source throughout.

<sup>427</sup> Dettermeijer-Vermeulen, C., Esser, L. and Noteboom, F. 2016. [Vulnerability up Close: An exploratory study into the vulnerability of children to human trafficking](#). [accessed 9 February 2024].

### *Group messaging*

- 7.3.69 Group messaging can enable the sharing of eating disorder content with multiple users simultaneously. Ofcom research found that eating disorder content is often shared in group chats on both messaging services and social media services. Active participation in such chats was more common among children with experience of eating disorders than among those without.<sup>428</sup> This functionality can also bring about the dissemination of eating disorder content across platforms. The same Ofcom research found that group chat participants were using the groups to share eating disorder content they had encountered on other social media platforms.
- 7.3.70 The evidence suggests that eating disorder content shared in group chats can be more extreme. Ofcom research found that children and young adults aged 13-21 with experience of eating disorders had posted harmful eating disorder content in group chats.<sup>429</sup> A study from 5Rights also illustrated how children engaging with weight-loss content could then be added to messaging groups where extreme disordered eating behaviours were encouraged.<sup>430</sup>
- 7.3.71 The sense of community between users created via group messaging can be particularly harmful. A study of 126 pro-anorexia websites observed that many had different group messages for different topics; for example, group messages for new members, to discuss eating disorders, and for discussion of non-eating disorder topics such as family issues. Regular communication could build a strong sense of community between group chat participants. In turn, this could contribute to an intensified belief in the harmful ideals discussed, and the encouragement of harmful behaviours. For example, this study observed group messages being used to inspire 'group fasts', as users joined fasts initiated by other users in the chat to show solidarity with their community.<sup>431</sup>

### *Reacting to content*

- 7.3.72 The evidence suggests that eating disorder communities are highly engaged online, and the level of engagement which eating disorder content can attract (such as likes and comments) can act as an incentive for children to continue posting such content. As has been previously described, Ofcom research described the experience of a 16-year-old girl who was inspired to create her own pro-anorexia blog following engagement with similar content from other users online. She explained that she 'enjoyed the popularity' her content received, which led to her wanting to post on the blog more.<sup>432</sup>

---

<sup>428</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>429</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>430</sup> The case study described the experience of a child who was concerned about their weight and started searching for weight-loss tips and diets on social media. After following 'thinspiration' accounts and posting about her weight loss, she soon connected with a community of users engaging with similar content and was added to several messaging groups. These groups encouraged extreme dieting and users requested verbal abuse to hold them to account on their disordered eating behaviours. Source: 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk.](#)

<sup>431</sup> The report describes an example where, following one user messaging to say they were starting a three day fast to regain control after Christmas, within two hours many other users had joined in solidarity. This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where's the harm?](#)

<sup>432</sup> Ofcom, 2022. [Risk factors that may lead children to harm online.](#)

## Commenting on content

- 7.3.73 The ability to comment on eating disorder content has the potential to amplify the risk of harm of the content, both for those commenting and those who encounter the comments, by allowing discussion of eating disorders and the promotion of disordered eating behaviours and ideals. A content analysis of ‘thinspiration’ videos and their comments found that ‘thinspiration’ posts induced conversations about eating disorders. Comments, a couple of which had thousands of likes, showed how many girls viewed thinness as a measure of success; comments often involved young girls comparing themselves to weight measurements discussed in the post/the body type of the person in the image, and discussing how much weight they wanted to lose.<sup>433</sup>
- 7.3.74 Commenting on content can be used to encourage disordered eating behaviour, particularly among children with experience of an eating disorder. An investigative journalism piece reported on the trend of posting shaming comments on eating disorder content, which targeted the appearance of the user posting the content.<sup>434</sup> These comments were seemingly intended to be used as ‘motivation’ for the user posting the image to continue their disordered eating.
- 7.3.75 Commenting on eating disorder content can risk drawing children down a ‘rabbit hole’<sup>435</sup> of engagement with further eating disorder content. Ofcom research described how children and young adults aged 13-21 felt they had been ‘taken in’ by worrying or extreme eating disorder content, which led them to engage with the comments on the post. Many of the children and young adults with experience of an eating disorder reported sharing their own stories and experiences in the comments, once drawn into a piece of content. Some described how this then ‘drew them down a rabbit hole’ of further conversations about eating disorders, or engagement with other harmful content.<sup>436</sup>
- 7.3.76 Commenting on content, combined with other functionalities, can lead to harmful outcomes. For example, commenting on content can lead children to being added to user groups. A study by 5Rights described the reflections of a 17-year-old girl who, when aged 14, had commented a few times on pictures, and was then added into several messaging groups that encouraged extreme dieting.<sup>437</sup> Engagement with eating disorder content via comments may also influence the type of content promoted through content recommender systems. Refer to sub-section ‘Recommender Systems’ within this section for more information.
- 7.3.77 As already discussed, commenting on content can make children visible online to perpetrators of CSEA. Evidence from an investigative journalism article suggested that

---

<sup>433</sup> ‘Thinspiration’ was defined as ‘visually promoting excessively thin female body types’ and often included visuals of women and girls with their ribcage showing. The study focused on teenage girls aged 13-19. Source: Hung, M., 2022. [A Content Analysis on Fitspiration and Thinspiration Posts on TikTok](#). [accessed 6 February 2024].

<sup>434</sup> Polanco, J., 2020. [The Incitement of Diet Culture and Disordered Eating through TikTok](#). J. Cole Nutrition. [accessed 6 February 2024].

<sup>435</sup> Where a user is continually fed or seeks particular content and so becomes more and more involved in or believing of such content. This could include harmful content such as misogyny or extremist views, and it becomes more and more difficult to extricate them from that content.

<sup>436</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>437</sup> 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk](#).

children with experience of an eating disorder are connecting with ‘anorexia coaches’ via comments left on posts on social media services. In this way, commenting on content can create a pathway for children to be put at even greater risk of harm.<sup>438</sup> Refer to sub-section ‘User Communication: Direct Messaging’ within this section for more information.

### *Posting content*

- 7.3.78 The functionality for users to post eating disorder content, in the form of videos, images or text, is fundamental way to how children encounter eating disorder content.
- 7.3.79 The ability to post images enables content to be shared which depicts bodies that may be ‘aspirational’ to children with an eating disorder. The evidence reports that posted images commonly feature people with an eating disorder,<sup>439</sup> as well as other ‘thinspiration’ images of emaciated women.<sup>440</sup> Ofcom’s research with children and young adults aged 13-21 reported how the graphic nature of these images posted online made them feel anxious, as well as fearful for the safety of those in the images.<sup>441</sup> These images can be posted by influencer accounts with large followings. Being able to post eating disorder content to large networks through user connections presents significant risk of harm to children (refer to sub-section ‘User Networking: User Connections’ within this section for more information). Influencers can also be incentivised by business models, focused on maximising engagement, to post shocking or extreme content such as graphic imagery of emaciated bodies. Refer to the Business models and commercial profiles section (Section 7.12) within this volume for more information.
- 7.3.80 Eating disorder content can contain information on how to sustain disordered eating behaviours, and posting this content can make the information easily visible to children. Ofcom research with children and young adults aged 13-21 found that posts about eating disorder content tended to be associated with restrictive eating. The participants said that this typically included instructions on how to restrict calories, such as extremely low-calorie diets and excessive exercise to compensate for calorie intake.<sup>442</sup>
- 7.3.81 As has been discussed, eating disorder content can be competitive in nature, and posting eating disorder content can reinforce this. Research commissioned by DCMS described how girls had tried to eat less, or exercise more, than had been suggested in the online posts they had seen.<sup>443</sup> Evidence has also shown that eating disorder content can take the form of ‘accountability posts’, where users post their current weight, target weight and

---

<sup>438</sup> Knox, M., 2019. [How anorexic kids as young as 13 are meeting ‘ana buddies’ online and helping each other starve](#), The Sun, 29 April.

<sup>439</sup> Ofcom research with children and young adults aged 13-21 described eating disorder content that involved ‘body checking’. ‘Body checking’ was described as images of individuals usually taken in front of a mirror and using camera angles and/or lighting to accentuate particular body features. Source: Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>440</sup> The research describes these images as images of extremely thin women displaying extremely protruding collarbones, hipbones and ribs, or thigh gaps. Source: Branley, D. and Covey, J. 2017. [Pro-ana versus Pro-recovery: A Content Analytic Comparison](#).

<sup>441</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>442</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>443</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

ultimate goal weight online, which can also contribute to the culture of competitiveness, as users aim for weights lower than those seen online.<sup>444</sup>

- 7.3.82 Posting eating disorder content can both make children visible to, and allow them to connect with, perpetrators of child sexual exploitation and abuse. Evidence from an investigative journalism article suggested that children with experience of an eating disorder can post content seeking an ‘anorexia coach’, and users acting as such ‘coaches’ post content to advertise themselves as such.<sup>445</sup> Therefore, posting of such content can create a pathway for children to become at more risk of harm. Refer to sub-section ‘User Communication: Direct Messaging’ within this section for more information.

## Content exploring

### *User-generated content searching*<sup>446</sup>

- 7.3.83 User-generated content searching has the potential to make eating disorder content easily accessible to children. This is a particular risk for those with experience of eating disorders, who are both more likely to be searching for such content and more likely to be at higher risk of harm from it. Ofcom research found that some children and young adults aged 13-21 reported actively searching for eating disorder content on social media.<sup>447</sup> This searching involved clicking directly on hashtags, alongside typing key terms, hashtags and code words into the search bar.
- 7.3.84 Evidence suggests that children can search for code words as opposed to explicit terms to evade detection or censorship, and bypass keyword blocking.<sup>448</sup> Research by 5Rights used avatars to search for key terms on accounts registered with a child’s age and found that searching for certain known and obvious terms associated with eating disorder content returned no results containing eating disorder content, while searching for code words ‘unlocked’ the harmful content.<sup>449</sup>
- 7.3.85 Content searching is particularly risky in combination with recommender systems, as searching for content can influence the content that is promoted by these systems. This risks cumulative harm to children from exposure to high volumes of eating disorder content. Refer to sub-section ‘Recommender Systems’ within this section for more information.

### *Content tagging*

- 7.3.86 Content tagging is the process of adding keywords and phrases to user-generated content, often used to describe its subject, topic, or theme. These are known to be

---

<sup>444</sup> Juarascio, A., Shoab, A. and Timko, C., 2010. [Pro-Eating Disorder Communities on Social Networking Sites: A Content Analysis](#). [accessed 9 February 2024].

<sup>445</sup> Knox, M., 2019. [How anorexic kids as young as 13 are meeting ‘ana buddies’ online and helping each other starve](#), The Sun, 29 April.

<sup>446</sup> User-generated content searching refers to a user-to-user service functionality allowing users to search for user generated content by means of a user-to-user service.

<sup>447</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>448</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#).

<sup>449</sup> The research involved setting up a series of avatars, which were profiles set up on social media apps that mimicked the online profiles of real children who took part in the interviews for this project. The age of the real child was used to register the profile and displayed in the bio of the user account. Source: 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk](#).

strongly associated with harmful content can be blacklisted by services as part of their content moderation practices. Refer to sub-section 'Recommender systems' in Wider context to understanding risk factors (Section 7.14) for more information on how content tagging can present risk of harm.

- 7.3.87 Coded content tags can be used to obscure and disguise harmful content, in an attempt to bypass content moderation systems and be disseminated by recommender systems. The use of coded hashtags in this way can risk creating spaces where harmful content can proliferate for extended periods without detection by online services. Research commissioned by DCMS reported how children and young adults aged 9-18 described body-image and eating disorder content as easy to find by using well-known coded hashtags, which led users to posts promoting anorexia and other disordered eating.<sup>450</sup> Ofcom research reported how knowledge of the coded hashtags appeared to spread in eating disorder online communities.<sup>451</sup>
- 7.3.88 Pop culture references can be used to disguise eating disorder content, and thus enable continued circulation of the content. Research from the Center for Countering Digital Hate used avatars registered with child ages to investigate recommender systems. It observed the use of a hashtag abbreviating K-pop and weight-loss to promote eating disorder videos. The research also found that a celebrity's name had been co-opted into multiple hashtags to evade moderation.<sup>452</sup>
- 7.3.89 Hashtags are also being used in relation to harmful eating disorder challenges. An Italian study among children and adolescents with eating disorders during the Covid-19 pandemic highlighted examples of such challenges, including users being encouraged to demonstrate certain body parts were smaller than common everyday objects.<sup>453</sup> Using hashtags to promote such challenges could increase the reach of a challenge, encourage engagement with it and risk trivialising the harmful behaviour. Refer to the Dangerous stunts and challenges content section (Section 7.8) within this volume for more information.
- 7.3.90 Eating disorder content can use the same hashtags as content promoting recovery, and the use of tagging to disguise the true nature of eating disorder content may increase the risk that more users will unintentionally encounter this content. An examination of pro-recovery communities online found that many videos tagged as pro-recovery contained eating disorder content.<sup>454</sup> Ofcom's research also described the experience of a child who saw eating disorder content tagged as content promoting recovery.<sup>455</sup>
- 7.3.91 Hashtags can also be used to frame potentially borderline content as eating disorder content. This risks creating an unintentional pathway from borderline content to eating disorder content. Ofcom research among children and young adults aged 13-21 described how hashtags that were not exclusively related to eating disorders could be used to tag

---

<sup>450</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children.](#)

<sup>451</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>452</sup> Center for Countering Digital Hate, 2022. [Deadly by Design.](#)

<sup>453</sup> Pruccoli, J., De Rosa, M., Chiasso, L., Perrone, A. and Parmeggiani, A., 2022. [The use of TikTok among children and adolescents with Eating Disorders.](#) [accessed 7 July 2023].

<sup>454</sup> Greene, A., Norling, H., Brownstone, L., Maloul, E., Roe, C. and Moody, S., 2023. [Visions of recovery: a cross-diagnostic examination of eating disorder pro-recovery communities on TikTok.](#) [accessed 9 February 2024].

<sup>455</sup> Ofcom, 2023. [Children's Media Lives.](#)



content which they thought crossed the line into more harmful content. They also noted that these hashtags were used by fitness and lifestyle influencers.<sup>456</sup> A content analysis into borderline restrictive eating content also found that hashtags associated with eating disorders were being used on fasting-related content.<sup>457</sup>

### *Hyperlinking*

7.3.92 Hyperlinks can be used in blogs promoting eating disorders to recommend webpages. A study of 126 pro-anorexia websites showed how users shared lists of other users they recommended following, with relevant pages hyperlinked.<sup>458</sup> The use of hyperlinks in this way may make it easier for accounts containing eating disorder content to become more visible.

## Content editing

### *Editing visual media*

7.3.93 Eating disorder content can be creatively edited to drive engagement with the content.<sup>459</sup> A study of 126 pro-anorexia websites observed artistically styled videos hosted on video-sharing services where ‘thinspiration’ images had been clipped together into montages, alongside black and white images from films, celebrities, drawings and doodles.<sup>460</sup>

## Recommender systems

### *Content recommender systems*

7.3.94 Services which deploy content recommender systems<sup>461</sup> are at higher risk for recommending and suggesting eating disorder content to children. Refer to the Wider context for understanding risk factors section (Section 7.14) within this volume for more information on how recommender systems work and how they can pose a risk to children.

7.3.95 Children’s engagement with certain topics such as body image, exercise, food, mental health, celebrity and lifestyle influencer content can lead to recommender systems promoting eating disorder content, so children encounter eating disorder content without actively searching for it. Indeed, Ofcom research among children and young adults aged 13-21 reported that participants said their initial encounters with eating disorder content were often unintentional, with children being algorithmically recommended harmful content they had not sought out.<sup>462</sup> To illustrate this, other Ofcom research described

---

<sup>456</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>457</sup> Evidence accessed by Ofcom but not yet publicly available. Source: Lavis, A. and Aziz, J. 2023. ‘Borderline’ Restrictive Eating Content on Social Media.

<sup>458</sup> This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where’s the harm?](#)

<sup>459</sup> While users can often create edited images and videos using third-party services, this content can then be shared on U2U services as user-generated content. Some U2U services also have dedicated editing functionalities that can be used to create such content.

<sup>460</sup> This source is a content analysis and does not specify child users. Source: Bond, E., 2012. [Virtually Anorexic – Where’s the harm?](#)

<sup>461</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

<sup>462</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)



how a child who followed K-Pop, healthy eating and beauty content was, over time, recommended dieting and restricted eating content.<sup>463</sup> Refer to the Non-designated content section (Section 7.9) within this volume for more information.

- 7.3.96 Some content recommended alongside eating disorder content may increase the risk of harm from eating disorder content. For example, The Center for Countering Digital Hate research used avatars to investigate recommender systems and found evidence to suggest that new child accounts which engaged with eating disorder content were recommended mental health content every 39 seconds.<sup>464</sup> Although the content relating to mental health may not be harmful in its own right, children encountering eating disorder content (a mental health disorder) *alongside* content relating to mental health may be particularly affected by this combination, and by the volume of mental health-related content on their feeds.<sup>465</sup> This is an example of ‘cumulative harm’ arising from a damaging combination of eating disorder content and content relating to mental health.
- 7.3.97 The evidence suggests that continued exposure to eating disorder content is common where children have engaged with eating disorder content. This is an example of ‘cumulative harm’, with children being served high volumes of harmful content. The Center for Countering Digital Hate research used avatars to investigate recommender systems and found evidence to suggest that new child accounts which engaged with eating disorder content were recommended eating disorder content within eight minutes of scrolling the ‘For you’ feed.<sup>466</sup> A child seeking out eating disorder content is likely to be particularly vulnerable to harm from this kind of content, yet current service design means that these more vulnerable children are more likely to be served high volumes of eating disorder content.
- 7.3.98 Recommender systems can exacerbate the risk of harm by recommending large volumes of eating disorder content to those who engage with it. Recommender systems are commonly designed to optimise user engagement, and to learn about the content users are likely to engage with through implicit (e.g., viewing multiple times) and explicit (e.g., liking, sharing, and commenting) user feedback. As explored earlier in this section, the

---

<sup>463</sup> The child felt that this fed into her negative eating behaviours. Source: Ofcom, 2022. [Risk factors that may lead children to harm online.](#)

<sup>464</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Center for Countering Digital Hate, 2022. [Deadly by Design.](#)

<sup>465</sup> To illustrate this, research relating to suicide and self-harm content suggested that recommending this type of content alongside ‘depressive’ content can exacerbate poor mental health in children. In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children’s experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: The Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest.](#) [accessed 9 February 2024].

<sup>466</sup> Note: We have considered the limitations of this study when presenting its findings. In this study, the avatars were new accounts set up by researchers on TikTok, in the USA, UK, Canada and Australia, at the minimum age TikTok allows, 13 years old. These accounts paused briefly on videos about body image and mental health, and liked them, to observe the impact on recommender systems. Source: Center for Countering Digital Hate, 2022. [Deadly by Design.](#)

pro-eating disorder community online is highly active.<sup>467</sup> Therefore, in this area, functionalities combine to increase the risk of harm, because engagement with eating disorder content may lead recommender systems to promote more content that is harmful.

- 7.3.99 It can be challenging to distinguish between eating disorder content and recovery content, because both types of content cover similar themes and use similar tags.<sup>468</sup> Some eating disorder content can also be disguised so that it does not initially appear to be harmful.<sup>469</sup> This creates a risk that recommender systems will inadvertently recommend eating disorder content to children wishing to engage with recovery content, or content that does not initially appear to be harmful. Indeed, Ofcom research found that children and young adults aged 13-21 believed that their initial engagement with disguised eating disorder content, even if they stopped looking at it once they realised its true nature, led to further such content being recommended.<sup>470</sup>
- 7.3.100 The risks, as outlined above, are particularly acute, as children with experience of an eating disorder are more likely to engage with eating disorder and/or recovery content, and are at greater risk of harm from seeing eating disorder content.

## Risk factors: Business model and commercial profile

### Revenue models

#### *Advertising-based model*

- 7.3.101 Advertising-based business models may increase the risk of children encountering eating disorder content. Services which optimise revenue based on user base and engagement have incentives to develop service designs and features that maximise engagement and drive revenue, even if this is at the expense of exposing child users to harmful content. As set out earlier in this section, eating disorder content can generate high engagement, especially within eating disorder communities. Advertising-based models therefore have the financial incentives to recommend such content to users, including children. Moreover, evidence indicates that child accounts can be served content that may not itself be eating disorder content, but is likely to increase the risk of harm from viewing eating disorder content if seen in combination. For example, research by 5Rights used avatars to search for key words on accounts registered with a child's age, and found that searching for eating disorder-related words returned social media accounts advertising harmful weight-loss products.<sup>471</sup> In an effort to keep them engaged, at-risk children are therefore being directed to harmful combinations of content. Refer to the Business

---

<sup>467</sup> As evidenced in this section, commenting on, reacting to and posting content is common among this community. Active searching for eating disorder content has also been observed. Refer to sub-sections 'User Communication' and 'Content Exploring' within this section for more information.

<sup>468</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>469</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>470</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

<sup>471</sup> The research involved setting up a series of avatars, which were profiles set up on social media apps that mimicked the online profiles of real children who took part in the interviews for this project. The age of the real child was used to register the profile and displayed in the bio of the user account. Source: 5Rights Foundation, 2021. [Pathways: how digital design puts children at risk.](#)

models and commercial profiles section (Section 7.12) within this volume for more information.

- 7.3.102 Advertising-based business models can also involve presenting children with advertising content likely to increase the risk of harm from eating disorder content. Research from Beat among adults with experience of an eating disorder found that 96% of those who took part reported having encountered adverts online which could be harmful in the context of their eating disorder. Most participants had encountered weight-loss programmes (89%), weight-loss apps (76%) and intermittent fasting adverts (73%). Eighty per cent reported seeing these adverts at least once a day, while 40% saw them multiple times a day, and 13% saw them more than five times daily.<sup>472</sup> There is evidence that children may have similar experiences. Research commissioned by DCMS reported that girls' social media feeds contained targeted adverts promoting unhealthy eating habits, body image, exercise patterns, and diet products.<sup>473</sup> Paid-for adverts are not in scope of the Act, but may increase the risk of harm from eating disorder content, particularly for children with experience of an eating disorder. In the Beat study discussed above, participants described how online advertising around weight loss fuelled their eating disorder or disordered eating behaviours. As one participant described, it's "*not the root cause, but cheers (my) eating disorder on*".<sup>474</sup> Should users encountering weight loss advertising alongside eating disorder content, it is likely to have a cumulative impact in exacerbating disordered eating behaviours.

---

<sup>472</sup> Beat, 2021. [Online advertising and eating disorders](#). [accessed 9 February 2024].

<sup>473</sup> One case study described the experience of a fifteen-year-old girl who, after being diagnosed with an eating disorder, unfollowed triggering accounts on social media but continued to be targeted with adverts for meal replacement pills. Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>474</sup> Beat, 2021. [Online advertising and eating disorders](#).

## 7.4 Abuse and hate content

**Warning: this section contains references to content that may be upsetting or distressing, including references to sexual violence.**

### Summary: risk of harm from abuse and hate content

This section covers content which is abusive and content which incites hatred. These are similar in that they both target groups and individuals based on listed characteristics and are therefore assessed together.<sup>475</sup>

Evidence suggests that the online environment may encourage the sharing of abuse or hate content. The far greater potential for anonymity online may enable users to trivialise the consequences of their actions and break social norms of respect and decency that they may adhere to in in-person interactions.

About one in five UK children have encountered or been targeted by content that is abusive, and content inciting hatred, such as misogynistic content, homophobia or racism. The risk of encountering such content is also higher online than in offline contexts.

Children with listed characteristics are at heightened risk of harm. They are more likely to be targeted as individuals based on these characteristics, or to encounter content targeting their identity group.

Encountering hate and abuse creates emotional harm, can damage self-esteem, discourage online expression, and affect educational performance. Evidence also highlights how children, in particular boys, are being influenced by online content to adopt hateful attitudes or behaviours, with worrying societal impacts.

#### *User base risk factors:*

Some users who post abuse or hate content may be incentivised to maintain a presence on larger mainstream social media services, in order to build their network. However, there is evidence that smaller, niche online services can contain far more abuse, including hateful activity, despite these services attracting far fewer users. The risk is that children might encounter hate content on larger services, then be led to the smaller services where there are higher volumes of such content.

Evidence shows that exposure increases with age, although lack of understanding of the content among younger children could also explain the increase in reported exposure.

Abuse and hate content targets users based on listed characteristics, making demographic factors highly relevant to risk of harm. Misogynistic content presents a number of gendered risks. Girls are more likely to be targeted by abuse and hate, while evidence suggests that boys are being frequently exposed to and indoctrinated by misogynistic ideologies online.

Children with other listed characteristics are disproportionately likely to be targeted by abuse and hate. They are also inherently more likely than children without these characteristics to encounter content targeting their identity group. Ethnicity, religion,

---

<sup>475</sup> These are the characteristics provided in the Online Safety Act ('the Act') definitions for content which is abusive, and content which incites hatred.

disability, gender identity and sexual orientation are therefore also risk factors for harm from abuse and hate content.

*Service type risk factors:*

Evidence suggests that abusive content is particularly likely to appear on social media and video-sharing services, where content recommender systems have been shown to suggest such content to children, regardless of whether they actively search for it.

Gaming services can also present risks for encountering abusive behaviour and may create opportunities for the spread of hate content to children, in particular within messaging functionalities. Social media services and gaming services are therefore included in the draft Children's Risk Profiles.<sup>476</sup>

*Functionalities and recommender systems risk factors:*

Several functionalities increase the risk of children encountering abuse and hate content.

The use of anonymous profiles enables users to do or say things online that they may not do in person, encouraging them to engage in hateful or abusive behaviour online. Abuse and hate content is commonly found in comment sections on posts; the harm is amplified when many comments are received simultaneously. These functionalities have been included in the draft Children's Risk Profiles.

Content recommender systems<sup>477</sup> may increase the risk of children encountering abuse and hate content, without their actively searching for or engaging with it. This content is encountered through 'scrolling' feeds, which rely on content being recommended by recommender systems. Those who do engage are likely to be served high volumes and potentially increasingly extreme forms of hate and abuse. For example, misogynistic content has become highly present in the online feeds of many boys in the UK. As a result, content recommender systems are also included in the draft Children's Risk Profiles.

Other functionalities also present a risk of harm from abuse and hate content. User connections enable children to add (or be added by) both friends and strangers to build their online networks. The wider their network, the higher the risk that children will encounter abuse and hate content. Stranger pairing, where users can be randomly put into contact with other users, also presents a risk of children encountering this content.

The ability to post abuse and hate online means children can create and share such content among their peers. Livestreaming can be used to broadcast abuse and hate content to a large audience, and some services allow users to combine user-generated content with existing content, which can then be used to respond to posts in a hateful way.

Children can, at times, be contacted through direct messages which can expose them to abuse and hate content. Children can also encounter abuse and hate that is shared via group messaging, which they can sometimes be added to without the option of declining. This may

---

<sup>476</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.

<sup>477</sup> Content recommender systems are often deployed by user-to-user (U2U) services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics and location. Recommender systems will also serve content that is popular, trending, and outside the user's normal engagement pattern.

be particularly true on group messaging chats on gaming services. Group messaging has been included in the draft Children’s Risk Profiles.

## Introduction

- 7.4.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by the following priority content<sup>478</sup> that is harmful to children on U2U services (‘risks of harm’):
- a) content which is abusive and which targets any of the following characteristics:
    - i) race,
    - ii) religion,
    - iii) sex,
    - iv) sexual orientation,
    - v) disability, or
    - vi) gender identity.<sup>479</sup>
  - b) content which incites hatred against people.<sup>480</sup>
    - i) of a particular race, religion, sex or sexual orientation,
    - ii) who have a disability, or
    - iii) who have the characteristics of gender reassignment.
- 7.4.2 We use the terms ‘abuse content’ and ‘hate content’ throughout this section, unless referencing specific evidence that uses different terminology.<sup>481</sup>
- 7.4.3 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section

---

<sup>478</sup> As referenced in Sections 62(2) and 62(3) of the Online Safety Act 2023 (‘the Act’), for content which is either abusive or incites hatred, (a) ‘disability’ means any physical or mental impairment; (b) ‘race’ includes colour, nationality, and ethnic or national origins; (c) references to religion include references to a lack of religion.

<sup>479</sup> Section 62(2) of the Act refers to ‘gender identity’ as ‘gender reassignment’.

<sup>480</sup> As referenced in Section 62(3) of the Act, for the purposes of content which incites hatred, a person has the characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex, and the reference to gender reassignment in subsection (i) is to be construed accordingly.

<sup>481</sup> The term ‘online hate’ is used by various sources to describe content which incites hatred. For example, Internet Matters refers to [online hate](#) as: ‘*language or actions that target a characteristic of a person or group of people in the digital space*’, and [online hate speech](#) as ‘*any online communication or expression which encourages or promotes hatred, discrimination or violence against any person or group because of their race, religion, disability, sexual orientation, gender or gender identity.*’ [accessed 6 December 2023].

Stop Hate UK refers to [online hate](#) as: ‘*posting and sharing hateful and prejudiced content against an individual, group or community. It can take the form of derogatory, demonising and dehumanising statements, threats, identity-based insults, pejorative terms and slurs.*’ [accessed 6 December 2023].

NSPCC cites [hateful content](#) as: ‘*where others are inciting hatred towards an individual or a group. If the focus of the hateful content is a protected characteristic, then it’s a hate crime.*’ [accessed 6 December 2023].

Cambridge Dictionary defines [hate speech](#) as: ‘*public speech that expresses hate or encourages violence towards a person or group based on something such as race, religion, sex, or sexual orientation.*’ [accessed 28 March 2024].

7) within this volume. 'Harm' means physical or psychological harm. Harm can also be cumulative or indirect.

- 7.4.4 Abuse and hate content both targets listed characteristics, and manifests in similar ways online. They are therefore frequently discussed together throughout this section. However, we understand there to be some distinguishing factors. In general terms, we understand abusive content as being directed at an individual, whereas content that incites hatred is more likely to be directed at a group of people. We also consider that the intended audience of the messaging is different; whereas abusive content is often directed at an individual, content that incites hatred is often inciting others towards hateful actions and behaviour.
- 7.4.5 'Bullying content' is differentiated by the fact that it does not necessarily target listed characteristics (although it may do so in some instances). Therefore, evidence for this harm is explored in a separate chapter, although there may be some overlap in evidence and analysis. Please see Bullying content (Section 7.5) within this volume for more detail.
- 7.4.6 In the draft Guidance on Content Harmful to Children (Section 8.6) later in this volume, we provide guidance on identifying abuse and hate content, including examples of what Ofcom considers to be, or considers not to be, abuse and hate content. Abuse and hate content can be on the basis of one or multiple characteristics. We define abusive content as content targeted at the listed characteristic(s) of an individual, for example content that objectifies and demeans individuals and serious threats or aggressive behaviours. Content that incites hatred is against a group, or a group of persons holding the same listed characteristic(s), for example, content which repeats harmful and discriminatory ideas about another group in order to encourage others to share such beliefs and content that defends or legitimises threatening action against a group of people. See 'Guidance on abuse and hate content' (Section 8.6) for more detail and contextual considerations when identifying abuse and hate content.
- 7.4.7 As abuse and hate content are directly associated with listed characteristics, user demographics are highly relevant to understanding how these harms manifest and the effects they have. This is discussed in the sub-sections on 'Impacts' and 'User demographics' within this section. To address this, this section draws some distinctions between:
- c) children encountering abuse or hate content;
  - d) children encountering abuse or hate content as a member of the protected characteristics group(s) it targets;
  - e) individual children being targeted by specific and/or direct abuse or hate content; and
  - f) children posting abuse or hate content.
- 7.4.8 We have sought evidence relating to content that specifically targets others based on listed characteristics, as per the Act's definitions of these harms. Due to overlaps and limitations in the evidence base available, some of the evidence described in this section relates to content which is broader than the definitions in the Act. Where such evidence has been included, it is because we think it is nevertheless relevant to understanding the risk of harm from abuse and hate content.
- 7.4.9 Some of the evidence we have drawn on in this section may also include content that could be considered 'hate offences' and is therefore illegal content. For further information on what content may amount to an offence, please refer to the [Illegal Content Judgements Guidance](#) and the draft Guidance on Content Harmful to Children



(Section 8.6) later within this volume. Hate offences are explored in detail in Section 6F in the [Illegal Harms Register](#) in our [Illegal Harms Consultation](#).

## How abuse and hate content manifests online

---

- 7.4.10 This sub-section looks at how abuse and hate content manifests online, and how children may be at risk of harm from these kinds of content.
- 7.4.11 Abuse and hate content can take many forms, including misogyny, racism, transphobia, homophobia and ableism. These forms of discrimination span offline and online contexts. However, the distinctive characteristics of the online environment may make it easier both to encounter and to share abuse and hate content. For example, the far greater potential for anonymity online may enable users to trivialise consequences, and break social norms of respect and decency, which they may adhere to in their in-person interactions. This is referred to in the literature as the ‘online disinhibition effect’.<sup>482</sup>

### Presence

- 7.4.12 Abuse and hate content varies depending on the listed characteristics they target. Children with these characteristics are at heightened risk of being targeted by abuse and hate, or encountering content targeting their identity or listed characteristic. The risk to children with multiple listed characteristics is compounded. Discussion of the relative presence of specific forms of abuse and hate content, and the disproportionate harm for different demographic groups, will be explored in the sub-sections on ‘Impact’ and ‘User base’ within this section.
- 7.4.13 Considering the child population as a whole, not just those with listed characteristics, many children in the UK encounter abuse or hate content online. Ofcom’s research on online experiences in 2023 found that one in five children had seen hateful content online: 21% of 13-17-year-olds reported that over a four-week period, they had seen or experienced ‘hateful, offensive or discriminatory content that targets a group or person based on specific characteristics like race, religion, disability, sexuality or gender identity’.<sup>483</sup> Internet Matters found that 23% of children aged 9-16 said they had come across ‘hate speech’ online (the period during which it had been seen was not cited in the study).<sup>484</sup>
- 7.4.14 Over longer periods, the likelihood of encountering hate content may increase. Research from 2016 reported that, over the course of a year, 82% of 13-18-year-olds said they had ‘seen or heard something hateful about a certain group on the internet’. Less than half (46%) said they had witnessed it *occasionally*, while 23% said it had happened *often*.<sup>485</sup>

---

<sup>482</sup> Suler, J, 2004. [The Online Disinhibition Effect](#). [accessed 28 March 2024]. Subsequent references to this source throughout.

<sup>483</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>484</sup> Internet Matters, 2023. [Digital tracker survey – June 2023](#). [accessed 28 March 2024].

<sup>485</sup> ‘Something hateful about a certain group on the internet’ was defined as: ‘*potentially offensive, mean or threatening behaviour targeted at or about someone because of their race, religion, disability, gender, sexual orientation or transgender identity*’. Source: UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#). [accessed 28 March 2024]. Subsequent references to this source throughout.

- 7.4.15 Misogynistic content is also being encountered by children. Research in 2023 found that 22% of 13-17-year-olds had seen or experienced, over a four-week period, ‘content or language which objectifies, demeans or otherwise negatively portrays women’;<sup>486</sup> while a study on the ‘effects of AI algorithms’ on 11-14-year-old boys found that seven in ten (69%) had been exposed to content that ‘promotes misogyny and other harmful views’, and more than half of them (52%) were aware of, and had engaged with, content from influencers with ties to the ‘manosphere’.<sup>487</sup> The disparity between these two data points can be explained by the differing focus of each study: the former asked about a range of harms among respondents aged 13-84, the latter focused on the serving of harmful content by AI algorithms to teenage boys.
- 7.4.16 Certain kinds of abuse are reported as more common in online spaces than offline. For example, half the participants in an international study with 15-25-year-old women and girls<sup>488</sup> reported that ‘online harassment was more common than street harassment’<sup>489</sup> in their lives (50%, compared to 19% who felt the opposite).
- 7.4.17 Children are more likely to encounter hate and abuse online than in offline contexts. As noted above, research from 2016 found that 82% of children had seen or heard something hateful online; higher than the proportions encountering this at school (77%), in other media (69%) or face-to-face in other places (54%).<sup>490</sup> Since then, children’s access to connected devices and online services has increased, which could in turn increase their exposure to this content online; widening the gap further between offline and online exposure. The presence of abuse and hate content in children’s online lives may also affect the volume of offline incidents of abuse and hate.<sup>491</sup>
- 7.4.18 Encountering these kinds of content is a considerable concern among children. Ofcom research found that ‘hateful, offensive or discriminatory content that targets a group or person based on specific characteristics’ was the kind of content which concerned the highest proportion of 13-17-year-olds. Sixty per cent expressed ‘high levels’ of concern about this kind of content existing online, while 51% felt ‘highly concerned’ about misogynistic content.<sup>492</sup>
- 7.4.19 The proportion of children targeted by abuse or hate content is also significant.<sup>493</sup> Research from 2016 shows that almost a quarter of 13-18-year-olds (24%) said they had

---

<sup>486</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>487</sup> Manosphere is defined in the study as: ‘a term used to describe the network of online communities responsible for creating and promoting negative, often misogynistic, content.’ Source: Vodafone, 2024. [The Rise of the Aggro-rhythm](#). [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>488</sup> Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment](#). [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>489</sup> Online harassment in this study was defined as ‘online abuse, harassment and hate’.

<sup>490</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#).

<sup>491</sup> One in five parents (22%) have noticed a gradual change over time in the language their sons use to talk about women and girls, while 70% of teachers have seen a rise in sexist language in the classroom during the last 12 months. Source: Vodafone, 2024. [The Rise of the Aggro-rhythm](#).

<sup>492</sup> The full definition in the research study for this kind of content was ‘content or language which objectifies, demeans or otherwise negatively portrays women’. Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>493</sup> Ofcom’s 2023 research into online experiences cannot show the proportion of children being targeted by this kind of content, due to the sample sizes being too low to report. Therefore, we are relying on older evidence here.

been targeted with online hate because of their characteristics (gender, sexual orientation, race, religion, disability or transgender identity), with 1 in 25 children (4%) saying this happened all or most of the time.<sup>494</sup>

- 7.4.20 Children can also post abuse and hate content. Evidence on the extent to which children are themselves posting this kind of content is limited, and has questionable reliability, given the limited understanding of the age of the users by many services and the tendency for problematic behaviours to be underestimated in research based on self-reported data. (See sub-section ‘User Communication’ within this section).

## Impacts

- 7.4.21 Abuse and hate content can cause emotional, behavioural and attitudinal harms to: those who encounter it, those in the targeted group, and those directly targeted as individuals.<sup>495</sup>
- 7.4.22 Children report a number of emotional impacts from encountering these kinds of content. More than half of children aged 9-15 (53%) reported feeling scared when seeing ‘racist, homophobic or sexist content’.<sup>496</sup> Research from 2016 found that about a third of children and young adults aged 13-18 reported feeling anger, upset, sadness, or shock after being exposed to ‘online hate’.<sup>497</sup> The same study found that hate which directly targeted an individual (whether known to the child or not) caused higher levels of emotional distress: 44% felt angry on seeing this, compared to 30% who saw hate targeted towards a particular group. Teenage boys also feel the effects of harmful content, including misogynistic and violent content, on their mental health: two-thirds (66%) reported that seeing these kinds of content online made them feel a range of negative emotions, including feeling worried, sad or scared.<sup>498</sup>
- 7.4.23 The impact of abuse and hate content can also affect educational performance. Research commissioned by DCMS<sup>499</sup> found that the combination of offline and online abuse<sup>500</sup> among 9-18-year-olds had detrimental effects on their wellbeing, confidence and feelings of isolation; which in turn could affect school attendance and concentration on academic learning.<sup>501</sup> An international study among women and girls aged 15-25 echoed this;<sup>502</sup>

---

<sup>494</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

<sup>495</sup> Abuse tends to be targeted at an individual, while incitement to hatred tends to be targeted at a group. See the draft Guidance on Content Harmful to Children (section 8.7) later within this volume.

<sup>496</sup> Internet Matters, 2023. [Children’s Wellbeing in a Digital World, Year Two Index Report 2023.](#) [accessed 28 March 2024].

<sup>497</sup> Proportions of 13-18s experiencing emotions: anger (37%), sadness (34%) and shock (30%). Source: UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

<sup>498</sup> Vodafone, 2024. [The Rise of the Aggro-rithm.](#)

<sup>499</sup> DCMS: The UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>500</sup> Online abuse in this study was defined as: ‘could be targeted at an individual or at a group of people due to their race, ethnicity, gender, religion, sexual orientation or disability; or personal attributes e.g. height, appearance, or just ‘being different’.’

<sup>501</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>502</sup> Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment.](#)

18% reported having problems at school due to their experience of ‘online harassment’.<sup>503</sup>

- 7.4.24 Being targeted by these kinds of content can also result in children withdrawing online. An international study among women and girls aged 15-25, who were frequently harassed online, revealed that 19% used social media service less, 18% stopped posting content that expressed their opinions, 16% changed the way they expressed themselves, and 12% stopped using the online service altogether.<sup>504</sup> Research from 2016 also found that concern around online hate affected children’s self-expression and use of technology: 74% said it made them more careful about what they shared online, while one in three said it made them less likely to use social media.<sup>505</sup>
- 7.4.25 Abuse and hate content can also create issues with relationship-building. Ofcom’s research on the impact of online hate among adults found that participants reported being more guarded and less trusting of others, and feeling less at ease when in public or interacting with people they did not know, due to the fear that people could be harbouring similar views to those they had experienced online.<sup>506</sup> While this study is not specific to children, there is a risk of similar attitudinal outcomes affecting children experiencing these kinds of content.
- 7.4.26 Encountering abuse and hate can be associated with the normalisation, encouragement or justification of harmful and discriminatory attitudes and behaviours among children. The harm caused by misogynistic content is particularly well-evidenced compared to other forms of abuse and hate. Evidence relates this content to violence and hostility towards women and girls, often creating a sense of crisis – for example, rising rates of mental ill-health or fear of ‘false’ claims of sexual assault – and position women and girls at the root of these issues.<sup>507</sup> Evidence suggests some children are adopting these attitudes: one study reports that 19% of boys aged 9-16 have a positive impression of Andrew Tate, an online personality whose content presents views that are generally considered to be misogynistic, rising to 23% of older boys (aged 15-16).<sup>508</sup>
- 7.4.27 These attitudes are playing out interpersonally, contributing to rising sexism within schools and homes that presents a risk of harm to others, in particular girls. Catch22 reported to Ofcom that “*young people (specifically boys) are taking learnings from the misogynistic content they are exposed to online and applying them to real-life relationships*”.<sup>509</sup> Another study found that one in five parents (22%) reported having noticed a gradual change over time in the language their sons use to talk about women

---

<sup>503</sup> ‘Online harassment’ in this study was defined as: ‘*action by one or more people that harms others based on their sexual or gender identity or by enforcing harmful gender norms. This action is carried out using the internet and/or mobile technology and includes stalking, bullying, sex-based harassment, defamation, hate speech, exploitation and gender trolling*’.

<sup>504</sup> Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment.](#)

<sup>505</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

<sup>506</sup> Ofcom, 2023. [Qualitative research into the impact of online hate.](#)

<sup>507</sup> Internet Matters, 2023. ["It's really easy to go down that path": Young people’s experiences of online misogyny and image-based abuse. \[accessed 28 March 2024\]](#) Subsequent references to this report throughout.

<sup>508</sup> Internet Matters, 2023. ["It's really easy to go down that path": Young people’s experiences of online misogyny and image-based abuse.](#)

<sup>509</sup> Ofcom, 2023. [Catch22 response](#) to 2023 Protection of Children Call for Evidence.

and girls, because of what they have seen online.<sup>510</sup> These mindsets are also being seen by teachers: seven in ten (70%) report having seen a rise in sexist language in the classroom over the last 12 months, and 81% stated that this behaviour was negatively affecting female students. This extends to boys as well: 79% of teachers reported that a lack of respect for female teachers was negatively affecting boys' listening and learning in class.<sup>511</sup>

- 7.4.28 The impact on boys of encountering misogynistic content may be heightened by encountering content that promotes potentially psychologically harmful ideals of masculinity. Internet Matters reports on the risks to the boys and young men who consume misogynistic content. For example, Andrew Tate claims that 'real men don't cry'; that mental illness makes people 'weak'; and that depression 'isn't real', pose a real threat to boys' mental health, wellbeing and self-esteem.<sup>512</sup> While evidence is limited for other kinds of discriminatory content, other forms of abuse and hate content may cause similar direct and indirect harm to children.
- 7.4.29 Children with certain demographic characteristics may experience heightened or additional harms from encountering online abuse and hate. This is likely to be related to the distinctive experience of encountering content targeting their own identity or shared characteristics. Children with listed characteristics, and particularly those with multiple listed characteristics, may be more severely affected. For example, a study commissioned by DCMS found that LGBTQ+ children from ethnic minority groups may not disclose and seek support for 'abuse'<sup>513</sup> if their offline support networks do not know or accept their sexual orientation or gender identity.<sup>514</sup> More detail on this can be found in sub-section 'User base' within this section.

## Evidence of risk factors on user-to-user services

---

- 7.4.30 We consider that the risk factors below are likely to increase the risks of harm relating to abuse and hate content. This is also summarised in the grey box at the start of the section.

### Risk factors: User base

#### User base size

- 7.4.31 Section 6F.31 of our [Illegal Harms Register](#) notes that the number of users on a service carries different risks associated with hate content. There is a risk of children encountering abuse and hate content, both on services with a large user base and on more niche, smaller services with a small user base, for different reasons. There is evidence that niche online services can contain far more abuse (including hateful activity) than mainstream services, despite these services attracting far fewer users. The research

---

<sup>510</sup> Vodafone, 2024. [The Rise of the Aggro-rithm](#).

<sup>511</sup> Vodafone, 2024. [The Rise of the Aggro-rithm](#).

<sup>512</sup> Internet Matters, 2023. ["It's really easy to go down that path": Young people's experiences of online misogyny and image-based abuse](#).

<sup>513</sup> This study categorised 'cyberbullying, abuse, trolling, harassment' as 'online abuse'; noting that these could be 'targeted at an individual or at a group of people due to their race, ethnicity, gender, religion, sexual orientation or disability, or personal attributes, e.g. height, appearance, or 'just being different'.'

<sup>514</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#).

suggests that some communities, and even entire services, are ‘deeply hateful’; that the Terms of Use for these services are ‘more lax’ than mainstream services, and do not explicitly prohibit hate speech. Comparison of hate content within these services, and more mainstream ones, found that while even in the more extreme parts of the internet not all posts are hateful, the level of hate is significantly higher than in mainstream services.<sup>515</sup>

- 7.4.32 Although there is a lack of evidence on children’s use of these smaller niche services, there is a risk that children might encounter hate content on large social media services, and then be led to smaller, niche services with higher volumes of hate content and therefore higher risk of harm. Our [Illegal Harms Register](#) (Section 6F.32) notes that ‘perpetrators of hate offences’ tend to use services with large and small user bases in different ways. Research has found that some potential perpetrators are incentivised to maintain a presence on larger mainstream social media services, where they build their network further with new users, attracting them with ‘borderline’ hate content (such as by sharing incendiary news stories and provocative memes). These networks of users are then directed towards less-moderated services. In these spaces, users discuss and share hate content more openly.<sup>516</sup>

## User demographics

- 7.4.33 The following sub-section outlines the evidence of how user base demographic factors affect the risk of harm. By definition, abuse and hate content presents specific risks to those whose demographic characteristics are listed characteristics. The evidence broadly falls into two categories:
- a) Evidence demonstrating the presence of specific types of abuse or hate content (misogynistic, homophobic etc.), indicating an increased risk of children in that group being targeted, either as an individual, or encountering content targeting their own characteristic.
  - b) Evidence that certain groups are at disproportionate risk of encountering abuse or hate content generally, and/or content targeting their listed characteristic.
- 7.4.34 Data suggests that user base characteristics including **age, gender, gender identity and sexual orientation, ethnicity, religion, mental health and disability** could lead to an increased risk of harm to children.
- 7.4.35 Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors

### Age

- 7.4.36 The risk of encountering abuse or hate content appears to increase with age. Research in 2016 reported that exposure to ‘online hate’<sup>517</sup> over the previous year was higher among 16-18-year-olds (89%) than those aged 13-15 (75%). In particular, older children were

---

<sup>515</sup> Data based on UK adults aged 18+. Source: The Alan Turing Institute (Vidgen, B, Margetts, H. and Harris, A.), 2019. [How much online abuse is there? A systematic review of evidence for the UK](#). [accessed 1 March 2024].

<sup>516</sup> N, Velasquez., R, Leahy., N, Johnson Restrepo., Y, Lupu., R, Sear., N, Gabriel., O, K, Jha., B Goldberg. and N, F, Johnson., 2021. [Online hate network spreads malicious COVID-19 content outside the control of individual social media platforms](#), Scientific Reports, 11 (11549). [accessed 1 March 2024].

<sup>517</sup> Online hate is defined in this study as: ‘something hateful about a certain group on the internet (for example, potentially offensive, mean or threatening behaviour targeted at or about someone because of their race, religion, disability, gender, sexuality or transgender identity)’.



more likely than the younger ones to be exposed to hate targeted at girls and women, lesbian, gay and bisexual people, transgender people, and those in minority ethnic communities.<sup>518</sup>

- 7.4.37 However, while younger children may encounter abuse content less often, they may be less well equipped to deal with it. Evidence indicates that older children are also more likely to be able to navigate abusive content online. Research commissioned by DCMS with 9-18 year olds reported that older children felt better at navigating ‘unwanted contact and online abuse’. The children in the study explained that they had not been aware of reporting and blocking functions when they were younger, but had learnt to identify suspicious contacts and felt more confident in declining requests as a result of their previous negative online experiences.<sup>519</sup>

#### Gender

- 7.4.38 Misogynistic content is commonly encountered by children. Ofcom research in 2023 found that almost a quarter of 13-17-year-olds (23%) reported encountering ‘content or language which objectifies, demeans or otherwise negatively portrays women’ over a four-week period; more likely to be seen by girls (28%) than boys (19%).<sup>520</sup>
- 7.4.39 Targeted studies among young women and girls reveal how many are encountering misogynistic content. An international study in 2020 found that gender-based harassment<sup>521</sup> online had been personally experienced on social media by 58% of women and girls aged 15-25 (63% across Europe).<sup>522</sup> A 2023 study by Girlguiding found that the proportion of women and girls aged 13-21 who have received ‘sexist comments’ online has almost tripled in ten years (from 20% in 2013 to 57% in 2023).<sup>523</sup> This is reflected in the observations of Catch22, a provider of educational and social support to children, which reports a rise in the “*violent and misogynistic content [against women and girls] being produced, consumed and shared online*”.<sup>524</sup>
- 7.4.40 Related to the presence of misogynistic content, and the higher risk of being targeted as a girl, the evidence indicates that girls are both more likely to be concerned by, and to experience emotional harms from, abuse and hate content. A study by Girlguiding found that more than half of young women and girls aged 11-21 (54%), said that fear of abuse made them feel less free to share their views online and on social media.<sup>525</sup> Research from 2016 found that online hate caused girls to be more careful than boys in what they shared online (77% vs 71%). The study also found that, among those who had witnessed online hate, girls aged 13-18 were more likely than boys that age to be worried about

---

<sup>518</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

<sup>519</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children.](#)

<sup>520</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>521</sup> Harassment in this study was defined as ‘online abuse, harassment and hate’.

<sup>522</sup> The overall proportion experiencing harassment includes those who cited ‘threats of violence’, ‘sexual harassment’, ‘body shaming’, and ‘threats of physical violence’ which are not in scope of this section’s definition of abusive content. Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment.](#)

<sup>523</sup> Girlguiding, 2023. [Girls Attitudes Survey 2023: Girls’ lives over 15 years.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>524</sup> Ofcom, 2023. [Response from Catch22 to our 2023 CfE.](#) Catch-22: [Home | Catch22 \(catch-22.org.uk\)](#)

<sup>525</sup> Girlguiding, 2023. [Girls Attitudes Survey 2023: Girls’ lives over 15 years.](#)



standing up to it, for fear of then being targeted (49% vs 40%). Girls were also more likely than boys to express certain emotions after encountering online hate in general: anger (45% of girls, 27% of boys), upset or sadness (41% vs 26%), and shock (36% vs 23%).<sup>526</sup>

- 7.4.41 Boys are also highly likely to be exposed to misogynistic content online. Ofcom research on online experiences reports that a fifth of boys aged 13-17 (19%) had seen misogynistic content over a four-week period.<sup>527</sup> A recent Vodafone study on the proportion of younger boys encountering misogynistic content via AI algorithms found that 69% of boys aged 11-14 had been exposed to online content promoting misogyny and ‘other harmful views’. This included high engagement with ‘manosphere’ content (52%), specifically content from Andrew Tate.<sup>528</sup> A study by Internet Matters which explored online misogyny found that boys were more likely than girls to see content by Andrew Tate, especially among older boys: 55% of 15-16-year-old boys had seen his content on social media, compared to 34% of girls the same age.<sup>529</sup>
- 7.4.42 Internet Matters goes on to express concern about the implications of online misogyny on behaviour if exposure begins at a young and susceptible age, such as misogynistic rhetoric translating into real-world violence, likely directed at women and girls.<sup>530</sup> See also sub-section ‘Impacts’ within this section.
- 7.4.43 Gender, as a risk factor, can intersect with other demographic factors such as age, ethnicity and sexuality.<sup>531</sup> An international study of online harassment<sup>532</sup> among women and girls aged 15-25 noted that 42% who identified themselves as LGBTQI+ had experienced harassment because of their sexuality, 37% were harassed due to being from an ethnic minority, and 14% because of a disability.<sup>533</sup> Research in 2016 found that girls were more likely than boys to be exposed to online hate targeting LGB people (47% of girls vs. 36% of boys), and hate targeting transgender people (38% of girls vs 18% of boys).<sup>534</sup>
- 7.4.44 Online harassment faced by adolescent girls is not a homogenous experience but parallels the differentiated and intersecting forms of abuse and discrimination girls also face in offline settings: in all countries, disability, race, ethnicity, and identifying as LGBTQI+

---

<sup>526</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

<sup>527</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>528</sup> Vodafone, 2024. [The Rise of the Aggro-rithm.](#)

<sup>529</sup> Internet Matters, 2023. ["It's really easy to go down that path": Young people’s experiences of online misogyny and image-based abuse.](#)

<sup>530</sup> Internet Matters, 2023. ["It's really easy to go down that path": Young people’s experiences of online misogyny and image-based abuse.](#)

<sup>531</sup> Throughout this section, references are made to variations of the acronym LGBTQIA+, which stands for lesbian, gay, bisexual, transgender, queer (or questioning), intersex, asexual, and others. Not all of the evidence sources quoted within this section use this full acronym; there will be instances of shorter versions also, such as LGB, which reflect the acronyms used in each source.

<sup>532</sup> Harassment in this study was defined as ‘online abuse, harassment and hate’.

<sup>533</sup> The overall proportion experiencing harassment includes those who cited ‘threats of violence’, ‘sexual harassment’, ‘body shaming’, and ‘threats of physical violence’ which are not in scope of this section’s definition of abusive content. Research does not include the UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment.](#)

<sup>534</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate.](#)

increase the harassment girls and young women face just because they are young and female.<sup>535</sup>

- 7.4.45 In cases where hate content or abuse targets multiple characteristics, rather than a single one, this can heighten the potential for harm. Ofcom research into the impact of online hate found that participants felt that hate targeting multiple characteristics can affect a greater number of people and therefore was more damaging.<sup>536</sup>

#### *Gender identity and sexual orientation*

- 7.4.46 Trans and non-binary children are disproportionately likely to be targeted online by abuse and hate content, both individually and as a group. Ofcom's 2023 research reported that just over a third of children aged 13-17 (35%) said that the abusive content<sup>537</sup> they had seen online, over a four-week period, was directed towards trans people, while 15% said it was towards non-binary people.<sup>538</sup> Less recent research, from 2016, found that three in ten children aged 13-18 had seen trans people targeted with online hate (29%); this was more likely to be seen by older children aged 16-18 (34%) than 13-15s (22%), and by girls than boys (38% vs 18%).<sup>539</sup>
- 7.4.47 Homophobic content is also commonly encountered by children online. More than a quarter of children aged 13-17 (27%) in Ofcom's 2023 research reported that the abusive content<sup>540</sup> they had seen online, over a four-week period, was directed towards people based on their sexual orientation.<sup>541</sup> Research in 2016 found that more than four in ten respondents aged 13-18 (42%) cited ever having seen LGB people targeted with online hate: this was more likely to be seen by older children aged 16-18 (46%) than by 13-15s (37%), and by girls than boys (47% vs 36% respectively).<sup>542</sup>
- 7.4.48 While evidence comparing the experience of LGBTQIA+ children to other children is limited, the high proportion of LGBTQIA+ children encountering abuse and hate online suggests this group are particularly affected. Stonewall reported that even if LGBT children had not been targeted themselves, nearly all said they had seen homophobic, biphobic and transphobic content online (97%), while more than four in ten (43%) said they saw it 'often'.<sup>543</sup> LGBTQIA+ children are also likely to experience being the target of abuse and hate online. Almost a fifth of school-age children in England (17%) in 2023 who reported being 'bullied'<sup>544</sup> online said they believe it was because of their sexual orientation.<sup>545</sup> Stonewall research in 2017 found that two-fifths (40%) of LGBT children

---

<sup>535</sup> Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls's and young women's experiences of online harassment.](#)

<sup>536</sup> Ofcom, 2023. [Qualitative research into the impact of online hate.](#)

<sup>537</sup> Abusive content seen in this research was defined as 'bullying, abusive behaviour, threats or hate speech'.

<sup>538</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>539</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate.](#)

<sup>540</sup> Abusive content seen in this research was defined as 'bullying, abusive behaviour, threats or hate speech'.

<sup>541</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>542</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate.](#)

<sup>543</sup> Stonewall, 2017. [School Report: The experiences of lesbian, gay, bi and trans young people in Britain's schools in 2017.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>544</sup> Although this data point references online bullying, as it targets listed characteristics it has been included in this section on Abuse and hate.

<sup>545</sup> Department for Education, 2023. [National behaviour survey – Findings from Academic Year 2021/2022.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

and young adults (aged 11-19) in Britain had been the target of homophobic, biphobic and transphobic abuse online.<sup>546</sup> In particular, nearly three in five trans people (58%) had been the target of transphobic abuse online.<sup>547</sup>

- 7.4.49 Evidence reporting the proportion of LGBTQIA+ people who have been targeted confirms the disproportionate risk of harm. Stonewall research among adults in 2017 found that one in ten (10%) had been the direct target of homophobic, biphobic or transphobic abuse online in the previous month, increasing to 23% of younger adults aged 18-24. One in four trans people (26%) were directly targeted with transphobic abuse online, higher again among the younger adults (34% of 18-24s).<sup>548</sup> Although this study was based on adults, dynamics similar to those in the 18-24 age group are likely to be represented across the LGBTQIA+ population in children.
- 7.4.50 Certain characteristics can intersect to increase the risk of abuse and hate online, such as gender and sexuality. The Stonewall research among adults reported that non-binary LGBT people were significantly more likely than LGBT men and women to experience personal online abuse (26% compared to 10% of men and 8% of women). Sexuality also intersects with ethnicity as a risk factor. The Stonewall research reported that minority ethnic LGBT adults were more likely than white LGBT people to experience homophobic, biphobic and transphobic abuse online (20% vs 9%).<sup>549</sup>

#### *Ethnicity*

- 7.4.51 Racist content presents a disproportionate risk of children from minority ethnic groups encountering content which targets their group. Ten per cent of children aged 13-17 in Ofcom's 2023 research reported that the 'abusive content'<sup>550</sup> which they had seen online over a four-week period was directed towards people based on their ethnicity, and 5% noted 'abusive content' directed towards people based on their nationality.<sup>551</sup> The Department for Education found in 2023 that one in ten school-age children in England who reported being 'bullied' online said they believed the reason was their nationality (11%), or their race or ethnicity (9%).<sup>552</sup> While referred to as 'bullying' within this study, being linked to nationality, race or ethnicity suggests that this abuse is likely to target listed characteristics. Research in 2016 among children and young adults aged 13-18 found that 42% had ever seen minority ethnic groups targeted with online hate, higher among those aged 16-18 than among 13-15s (48% vs 36%).<sup>553</sup>

#### *Religion*

- 7.4.52 A child's religion can contribute to the risk of encountering content targeting them or their religious group. More than one in ten UK children aged 13-17 (13%) in Ofcom's 2023

---

<sup>546</sup> Stonewall, 2017. [School Report: The experiences of lesbian, gay, bi and trans young people in Britain's schools in 2017.](#)

<sup>547</sup> Stonewall, 2017. [School Report: The experiences of lesbian, gay, bi and trans young people in Britain's schools in 2017.](#)

<sup>548</sup> Stonewall, 2017. [LGBT in Britain: Hate crime and discrimination.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>549</sup> Stonewall, 2017. [LGBT in Britain: Hate crime and discrimination.](#)

<sup>550</sup> Abusive content seen in this research was defined as 'bullying, abusive behaviour, threats or hate speech'.

<sup>551</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>552</sup> Department for Education, 2023. [National behaviour survey – Findings from Academic Year 2021/2022.](#)

<sup>553</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate.](#)

research reported that the abusive content they had seen online, over a four-week period, was directed towards people based on their religion.<sup>554</sup> Two per cent of school age children in England who reported being bullied online said they believed it was because of their religion or beliefs.<sup>555</sup>

- 7.4.53 Exposure over longer periods brings a higher likelihood of seeing such content: in 2016, more than half of 13-18s in the UK (55%) said they had seen, in the past year, online hate targeted towards people of a certain religion.<sup>556</sup>

#### *Mental health and disability*

- 7.4.54 The presence of content targeting people with mental and physical disabilities suggests that children with disabilities are more likely to be targeted, either as individuals or as a group. A fifth of children aged 13-17 (20%) in Ofcom's 2023 research reported that the abusive content they had seen online in a four-week period was directed towards people based on their disability.<sup>557</sup>
- 7.4.55 Indeed, the evidence shows that children with disabilities are disproportionately likely to be targeted by online hate. Research in 2016 found that, among respondents aged 13-18, those with disabilities were more likely to have experienced being targeted with online hate (38%), than those with no disabilities (21%). They were also more likely to experience this *all or most of the time* (20%) than those with no disabilities (12%).<sup>558</sup>
- 7.4.56 Research commissioned by DCMS into the impact of online harms on children and young adults (ages 9-18) found that children with special educational needs and disabilities (SEND) may be more vulnerable to being targeted by online abuse.<sup>559</sup> Those with learning disabilities and autism were identified as being vulnerable to seeking connections online with strangers, but were not always able to distinguish between healthy and harmful connections with others, either online or offline.<sup>560</sup> This may make them more susceptible to being targeted by online abuse.
- 7.4.57 There are distinct emotional and behavioural impacts here. Children and young adults aged 13-18 with a disability were more likely to be worried about online hate than those without a disability (45% vs 4%) and to feel angry when seeing it (54% vs 35% of those without a disability). They were also more likely to say that online hate had made them less likely to use social media (43% vs 32% of those with no disability).<sup>561</sup>

---

<sup>554</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>555</sup> Department for Education, 2023. [National behaviour survey – Findings from Academic Year 2021/2022](#).

<sup>556</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate](#).

<sup>557</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>558</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate](#).

<sup>559</sup> Online abuse in the study included being targeted 'due to race, ethnicity, gender, religion, sexual orientation or disability; or personal attributes e.g. height, appearance, or just 'being different'.

<sup>560</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#).

<sup>561</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate](#).

## Risk factors: Service types

7.4.58 Research suggests that the following service types can increase the risk of abuse and hate content, manifesting online: **social media and video sharing services, and gaming services**. A U2U service may simultaneously include more than one service type.

### Service type

#### *Social media services and video-sharing services*

- 7.4.59 Evidence suggests that children can often encounter abuse or hate content on social media services, as well as video-sharing services.
- 7.4.60 Ofcom's research on online experiences<sup>562</sup> found that certain kinds of content were more likely to be seen on social media than on other online services.<sup>563</sup> Three-quarters of respondents<sup>564</sup> reported that their most recent experience of 'hateful, offensive or discriminatory content that targets a group or person based on specific characteristics' had been on a social media website or app (74%). Two-thirds of respondents (67%) also reported that their most recent experience of misogynistic content was on a social media website or app.<sup>565</sup> This research also found that about one in ten respondents reported that their most recent experience of seeing hateful content (11%) and misogynistic content (12%) was on video-sharing services.<sup>566</sup>
- 7.4.61 Similarly, research from 2016 found that, among respondents aged 13-18 who had seen online hate, more respondents said they had seen such content on social media in the *previous year* (81%), than on other types of services.<sup>567 568</sup>
- 7.4.62 More targeted studies indicate the nature of online hate on these services. A US study looking at experiences of online hate within social media and online games found that 17% of respondents aged 13-17 (who were online gamers) reported being exposed to white supremacist views on social media (17%) – more so than on the other services,<sup>569</sup> including online gaming services.<sup>570</sup>

---

<sup>562</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>563</sup> The other services included in the Ofcom survey were: 'a website or app where you view videos posted by other users'; news website or app; instant messenger website or app; email; livestreaming website or app; Q&A website or app; blog website or app; the 'dark web'; online dating websites or apps; search engine; 'adult' site containing sexual content; shopping website/app; gaming website/app; video on demand app; in-game chat/chat room; generative AI; other.

<sup>564</sup> This proportion includes both adults and children aged 13-17, as the sample of children experiencing this content was too low to report on alone.

<sup>565</sup> The full definition in the research study for this kind of content was '*content or language which objectifies, demeans or otherwise negatively portrays women*'.

<sup>566</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>567</sup> The other services included in the UK Safer Internet Centre survey were: videos and video comments threads; websites or blogs; chat functions in games; instant messaging services, forums or message boards, video chat services. Collectively, 66% of children reported seeing online hate on these services.

<sup>568</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people's experiences of online empowerment + online hate](#).

<sup>569</sup> The other services asked about in this study were: through a chat app (10%); through an online video game (10%); on a forum (6%). 'In person' was also included (11%).

<sup>570</sup> ADL, 2021. [Hate is No Game: Harassment and Positive Social Experiences in Online Games 2021](#). [accessed 28 March 2024]. Subsequent references to this report throughout.

### *Messaging services*

- 7.4.63 Specific evidence relating to children encountering abuse and hate content within messaging services is limited. However, evidence and analysis from our [Illegal Harms Register](#) (Section 6F.27) notes how private messaging services can be used to create inward-looking groups, which can be perceived as a safe space to stir up hatred based on race or ethnicity, religion or sexual orientation.
- 7.4.64 There is evidence to suggest that messaging functionalities (such as direct messaging and group messaging) are used to share abuse and hate content, although this evidence relates to messaging functionalities within other service types, such as gaming and video-sharing services (see sub-section 'User communication' within this section). However, as these functionalities are central to messaging services, it is reasonable to assume that such services are likely to pose some risk to children relating to abuse and hate content.

### *Gaming services*

- 7.4.65 Evidence suggests that gaming services are a space in which children can encounter abuse or hate content. Indeed, several organisations report on the issue of abuse and hate content on these services. A United Nations report examining gaming and violent extremism noted that certain gaming communities enable *"a culture in which misogyny, toxicity, racism and hate can flourish"*.<sup>571</sup> Our [Illegal Harms Register](#) (Section 6F.29) cites an investigation by the BBC which concluded that *"extremists are using mainstream video games and gaming chat platforms to spread hate"*. The BBC investigation also found *"antisemitism, racism and homophobia on platforms [where] users stream and chat about games"*.<sup>572</sup>
- 7.4.66 In a US study among gamers, 12% of the gamers aged 13-17 reported being 'excluded from joining a game or chat because of their identity (based on age, gender, ethnicity, etc.)'. This study also found that 10% had been exposed to discussions around white supremacist ideologies within online multiplayer games.<sup>573</sup>
- 7.4.67 As noted above, children on gaming services are at risk of encountering abuse and hate, particularly through the messaging functionalities that are often offered on gaming services (see sub-section 'User communication' within this section).

### *Discussion forums and chat-room services*

- 7.4.68 Abuse and hate content can be found within chat functionalities and forums, although evidence on this is limited. In a US study looking at experiences of online hate among online gamers, one in ten of the child gamers aged 13-17 had been exposed to discussions around white supremacist ideologies within chat apps (10%), and 6% within a forum.<sup>574</sup>

---

<sup>571</sup> United Nations Office of Counter-Terrorism, 2022. [Examining the Intersection Between Gaming and Violent Extremism](#). [accessed 28 March 2024].

<sup>572</sup> Miller, C. and Silva, S., 2021. [Extremists using video-game chats to spread hate](#). BBC, 23 September. [accessed 28 March 2024].

<sup>573</sup> ADL, 2021. [Hate is No Game: Harassment and Positive Social Experiences in Online Games 2021](#).

<sup>574</sup> ADL, 2021. [Hate is No Game: Harassment and Positive Social Experiences in Online Games 2021](#).



## Risk factors: functionalities and recommender systems

### User identification

#### *User profiles*

- 7.4.69 The type of profile that children use, such as open or public profiles or accounts, and the implications for user connections, increases the risk of children being targeted by abuse and hate content. A 10-year-old participant in Ofcom research spoke about how he wanted an open account when gaming, to be able to play against lots of different people in public matches. However, during one such public match, he experienced racist abuse from another player in a first-person shooter game.<sup>575</sup>
- 7.4.70 The personal information displayed in a user profile can also present as a risk. A US study about the experiences of gamers in online multiplayer games found that the identity of a user (based on their age, gender, ethnicity, etc.) could result in a form of abuse, in that they were excluded from joining a game or chat. This was experienced by 12% of 13-17-year-old gamers.<sup>576</sup>

#### *Anonymous profiles*

- 7.4.71 Anonymity can be important in protecting users and allowing people to express themselves and engage freely online; for example, users who wish to talk openly about their sexuality or explore gender identity without fear of discrimination or harassment. Anonymity can enable users to express ideas or criticisms about people in power without risking attribution.<sup>577</sup>
- 7.4.72 While anonymity online confers some important benefits, the ability to create anonymous user profiles can also increase the risk of others encountering abuse and hate content. Anonymity has been cited as one of the principal factors creating the ‘disinhibition effect’ when people do or say things online that they would not do in person.<sup>578</sup>
- 7.4.73 Our [Illegal Harms Register](#) (section 6E.59) made two points about gender-based harassment: that anonymous participants made more threats than identifiable participants,<sup>579</sup> and that the perception of anonymity predicted users’ intentions to engage in harassing behaviour online.<sup>580</sup> The consultation notes that some studies suggest that anonymity can increase the risk of users sharing hate content, but also that a significant amount is also shared by users who are not anonymous.
- 7.4.74 There is evidence of children experiencing abuse and hate content via anonymous profiles. The findings of an international study among 15-25-year-old women and girls showed that, of those who had either experienced or knew someone who had

---

<sup>575</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>576</sup> ADL, 2021. [Hate is No Game: Harassment and Positive Social Experiences in Online Games 2021.](#)

<sup>577</sup> E-Safety Commissioner, n.d. [accessed 29 April 2024].

<sup>578</sup> Suler, J, 2004. [The Online Disinhibition Effect.](#)

<sup>579</sup> Note: Study with students in Israel, aged 18-34. Source: Lapidot-Lefler, N. and Barak, N., 2012, [Effects of anonymity, invisibility, and lack of eye-contact in toxic online disinhibition.](#) Computers in human behaviour, 28(2). [accessed 1 March 2024].

<sup>580</sup> Note: Study with students in the USA, with a mean age of 22. Source: Ritter, 2014. [Deviant Behavior in Computer-Mediated Communication: Development and Validation of a Measure of Cybersexual Harassment,](#) Journal of computer-mediated communication, 19 (2). [accessed 15 March 2024].



experienced ‘harassment’ online,<sup>581</sup> this harassment was either by strangers (36%) or anonymous social media users (32%). Twenty-nine per cent said it came from people on social media platforms who were not their friends. This was significantly more likely than the proportion who were harassed by people they knew: 23% by people from school or work, and 21% by friends.<sup>582</sup>

## User networking

### *User connections and user groups*

- 7.4.75 Functionalities that allow users to easily add new connections, based on ‘friend of friend’ networks, increase the risk that children will encounter or be targeted by abuse and hate content.
- 7.4.76 The evidence reports that children are being sent abusive messages by other users who have added them to their networks. For example, Ofcom research found several participants aged 7-17 who had been exposed to abusive and racist language in this way, including a 14-year-old girl who had been sent racist abuse in a message on a video-sharing service by a stranger who had added her (see sub-section ‘User communication’ within this section).<sup>583</sup>
- 7.4.77 Children report encountering abuse and hate in user groups. A study commissioned by DCMS, on the impact of online harms among 9-18-year-olds, identified that connection requests, and being added to groups, were common ways in which children encountered these kinds of content.<sup>584</sup>

### *Stranger pairing*

- 7.4.78 Pairing random users to chat online, via text, video or both, presents a risk that children could encounter, or be targeted by, hate or abuse. Ofcom research on the risk factors that may lead children to harm found that two participants, aged 13 and 17, had used a 13+ online service which pairs random users to chat to each other, and both had encountered abusive and racist language within it. They had both tried using this particular service because they had heard of friends using it or had seen ‘vloggers’ trying it.<sup>585</sup>

## User communication

### *Livestreaming*

- 7.4.79 As noted in our [Illegal Harms Register](#) (Section 6F.47), livestreaming may be used to share hate content with large audiences of users.
- 7.4.80 The ephemeral nature of livestreaming means it is less likely to be continuously monitored by automated tools, and the steps users need to take to report and flag content can increase the risk that livestreamed content goes undetected for longer. The risk of harm presented by livestreaming is increased when paired with screen recording

---

<sup>581</sup> Harassment in this study was defined as ‘online abuse, harassment and hate’.

<sup>582</sup> Research does not include UK. Source: Plan International, 2020. [Free to be online? Girls’s and young women’s experiences of online harassment.](#)

<sup>583</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>584</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children.](#)

<sup>585</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

functionality, as the subsequent recording and dissemination of potentially hateful livestreamed footage can increase content virality.<sup>586</sup>

- 7.4.81 Ofcom research shows that more than six in ten children aged 3-17 (63%) reported watching content on livestreaming services in 2023, increasing to about eight in ten 13-15s (81%) and 16-17s (81%).<sup>587</sup> The reported use by children of this livestreaming functionality presents a risk of them encountering abuse and hate online.

#### *Direct and group messaging*

- 7.4.82 Messaging functionalities, particularly group messaging chats within gaming services, can play a role in children encountering abuse and hate content. The evidence around messaging functionalities as a risk focuses specifically on gaming services. Research from 2016 reported that one in ten children aged 13-18 said they had seen online hate within chat functions in games; this was more likely among boys than girls (15% vs 5%).<sup>588</sup>
- 7.4.83 Children can sometimes be added to group messaging chats and contacted by users they do not know without being given the option of declining. The user may have to opt-out by leaving the chat, as opposed to having an active choice on whether to engage in the first place. Research by Ofcom on the risk factors that may lead children to harm online reported on one child participant who had experienced racism from a stranger who had added her via the service, and then sent her a stream of abusive messages.<sup>589</sup>

#### *Commenting on content*

- 7.4.84 Abuse and hate content is commonly found in comment sections on posts online. Our [Illegal Harms Register](#) (Section 6F.50) notes how hateful content sent to an individual through a comment functionality can be amplified by the scale of comments that the individual receives. Ofcom research on footballer abuse suggests that a user may send just one abusive comment to an individual,<sup>590</sup> but the targeted individual can then receive comments from a lot of other users simultaneously.
- 7.4.85 Our [Illegal Harms Register](#) (Section 6F.50) cited research into online hate crime against LGBT+ adults, which found that 71% of online anti-LGBT+ incidents involved more than one perpetrator, and 13% involved 21 or more perpetrators. This resulted in respondents reporting incidents of ‘cybermobbing’ (where a group of individuals come together to attack a single target) and/or ‘dogpiling’ (where a large number of individuals respond to a post in a disparaging or spiteful way).<sup>591</sup>

---

<sup>586</sup> Ofcom, 2022. [The Buffalo Attack: Implications for Online Safety](#).

<sup>587</sup> Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>588</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#).

<sup>589</sup> Ofcom 2022. [Research into risk factors that may lead children to harm online](#).

<sup>590</sup> Ofcom’s research into Twitter abuse of Premier League football players found that many users send just one abusive tweet. Source: The Alan Turing Institute, (Vidgen, B., Chung, Y-L, Johansson, P., Kirk, H.R., Williams, A., Hale, S.A., Margetts, H., Röttger, P. and Sprejer, L.), 2022. [Tracking abuse on Twitter against football players in the 2021-22 Premier League season](#). [accessed 27 April 2024].

<sup>591</sup> Note: Survey was with 700 LGBT people in the UK aged 18-70+. Galop, 2020. [Online Hate Crime Report 2020: Challenging online homophobia, biphobia and transphobia](#). [accessed 22 April 2024].

- 7.4.86 Ofcom research on online experiences<sup>592</sup> found that, of the respondents<sup>593</sup> who had seen hateful content,<sup>594</sup> almost half had seen it in comments or replies to a post, article or video (46%). A third of respondents had seen misogynistic content in this way (34%). Both these kinds of content were most commonly experienced while scrolling through feeds, followed by being found in comments (see sub-section ‘Recommender systems’ within this section).
- 7.4.87 There is little available recent evidence on children in this area, but older research has similar insights into the role of comments. In 2016, a quarter of 13-18-year-olds (26%) who had seen something hateful online said it was in ‘videos and video comment threads’; this was more likely among children aged 16-18 (29%) than those aged 13-15 (23%).<sup>595</sup>

#### *Posting content*

- 7.4.88 Children can encounter abuse and hate content posted by friends, whom they are also connected to online, indicating also how children can be both the creators and sharers of abuse and hate content online. UK research in 2016 reported that 35% of 13-18-year-olds said they had seen their friends ‘posting offensive, mean or threatening things online about people of a certain group’.<sup>596 597</sup> This was more common among boys: in the same age group four in ten boys (41%) agreed with this statement, compared to three in ten girls (29%). Boys were also more likely to see their friends sharing ‘offensive humour’ about a certain group (78%, vs 69% of girls).<sup>598</sup>
- 7.4.89 Evidence exploring the proportion of children self-reporting abuse and hate content is limited. However, a 2018 study from Germany found that 11.3% of 12-17-year-olds reported having posted at least one item of ‘hateful or degrading writing or speech online, inappropriately attacking certain groups of people or individuals because of their sex, religious affiliation, race or sexual orientation’.<sup>599</sup> This may indicate the proportion of children posting abuse and hate content in the UK.

---

<sup>592</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>593</sup> The proportion of children in the survey (aged 13-17) who experienced this content was too low to report on, hence figures are based on adults and children.

<sup>594</sup> Hateful content defined in the study as ‘hateful, offensive or discriminatory content that targets a group or person based on specific characteristics’.

<sup>595</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#).

<sup>596</sup> The definition in the research for a ‘certain group’ was ‘for example, girls, LGBT people, disabled people or a certain race or religion’.

<sup>597</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#).

<sup>598</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#).

<sup>599</sup> Wachs, S. and Wright, M., 2018. [Associations between Bystanders and Perpetrators of Online Hate: The Moderating Role of Toxic Online Disinhibition](#). [accessed 28 March 2024].

## Recommender systems

### Content recommender systems

- 7.4.90 Abuse and hate content is commonly encountered through scrolling through feeds. This pathway to harmful content relies on content being recommended to users by recommender systems. A detailed explanation of how content recommender systems<sup>600</sup> work, and how they can pose a risk to children, is set out in our Wider context for understanding risk factors section (Section 7.14) within this volume.
- 7.4.91 Evidence indicates that hate and abuse content is being recommended to child users. Ofcom’s research on online experiences<sup>601</sup> found that certain kinds of content were most likely to be seen when respondents<sup>602</sup> were scrolling through their feeds. For example, more than half of respondents (55%) encountered hateful content<sup>603</sup> while scrolling, and 51% encountered misogynistic content<sup>604</sup> this way. While this study explores the experiences of adults and children, scrolling, and the associated role of recommender systems, is likely to remain important when considering children in isolation.
- 7.4.92 For example, if children’s accounts indicate an interest in certain kinds of content, this is then served to them rapidly, and in high volumes. A 2022 investigation by *The Observer* revealed how an 18-year-old’s account was served videos aimed at male users. Initially, this was comedy and mental health content which then progressed to content that appeared to be tailored towards men. This included videos by Andrew Tate, which were recommended without the user ‘liking’ or searching for any of this kind of content proactively.<sup>605</sup> When harmful content is repeatedly encountered by a child, this may lead the child to experience ‘cumulative harm’.<sup>606</sup>
- 7.4.93 Other evidence shows how child users can be served abuse and hate content, regardless of whether they have actively searched for this kind of content. A recent UK study on the effects of AI algorithms on 11-14-year-old boys reported that most boys are being served misogynistic content without having actively searched for it. The study found that 69% are led to content promoting misogyny through innocent and unrelated searches, due to recommender systems. On average, the boys in the study were exposed to harmful content (including misogyny and violence) within 30 minutes of being online, and one in

---

<sup>600</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

<sup>601</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>602</sup> The proportion of children in the survey (aged 13-17) who experienced this content was too low to report on, hence the figures are based on adults and children.

<sup>603</sup> Hateful content in this research defined as ‘*Hateful, offensive or discriminatory content that targets a group or person based on specific characteristics like race, religion, disability, sexuality or gender identity; e.g. hate speech*’.

<sup>604</sup> The full definition in the research study for this kind of content was ‘*content or language which objectifies, demeans or otherwise negatively portrays women*’.

<sup>605</sup> Note: For this experiment, news organisation The Observer set up a new account on TikTok to resemble a teenager (aged 18) to see what content the algorithm recommended. Source: Das, S., 2022. [How TikTok bombards young men with misogynistic videos](#), The Guardian, 6 August. [accessed 28 March 2024].

<sup>606</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different kinds of harmful content (PPC, PC or NDC), or a kind of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction (Section 7) to the Children’s Register of Risks within this volume.

ten were seeing it in as little as 60 seconds.<sup>607</sup> An Australian study using ten avatar accounts (aged between 13 and 20) found that each of the accounts were recommended misogynistic videos on a video-sharing service. Four of the accounts were set up as being aged under 18. While some accounts were set up to deliberately seek out extreme sources and influencers, all the accounts received this kind of content, with more overtly misogynist 'manosphere' and 'incel'<sup>608</sup> content also being recommended.<sup>609</sup>

---

<sup>607</sup> Vodafone, 2024. [The Rise of the Aggro-rithm](#).

<sup>608</sup> 'Incel' is defined as *'a member of a group of people on the internet who are unable to find sexual partners despite wanting them, and who express hate towards people whom they blame for this.'* [Cambridge Dictionary](#) [accessed 13 February 2024].

<sup>609</sup> Reset.Australia, 2022. [Algorithms as a weapon against women: How YouTube lures boys and young men into the 'Manosphere'](#). [accessed 28 March 2024].

## 7.5 Bullying content

**Warning: this section contains references to content that may be upsetting or distressing, including references to self-harm and suicide.**

### Summary: risk of harm from bullying content

This section covers bullying content. Content may, in particular, be ‘bullying content’ if it is targeted against a person and a) conveys a serious threat, b) is humiliating or degrading, or c) forms part of a campaign of mistreatment. In online environments, being targeted with bullying content can feel inescapable, with evidence suggesting that the potential for anonymity can encourage the creation and sharing of bullying content.

Up to one in four children have been targeted by bullying content and behaviour online, with experiences varying depending on a child’s characteristics, as noted below. Being targeted by bullying content is linked to a range of harmful outcomes, from poor educational performance and social withdrawal to self-harm and suicidal ideation.

#### *User base risk factors:*

Some studies indicate that services with **larger user bases** can be used to spread bullying content to a wider audience, thereby intensifying the harm to the person being bullied.

Several demographic factors increase the risk of children being exposed to bullying content and behaviour. In some instances, there may be cross-over between bullying content and abuse and hate content which targets individuals based on listed characteristics. This latter kind of content is explored in the Abuse and hate content section (Section 7.4) within this volume.

**Secondary-school-aged children** are more likely than those in primary school to encounter and experience bullying content online. However, younger children are becoming more likely to encounter it, due to having greater access to devices and online services than ever before.

Gender and sexuality affect the risk to children from bullying. Although online bullying is likely to be experienced by both girls and boys, most studies suggest that **girls** are more likely to be targeted. However, boys are less likely to report bullying, so may under-report their experiences. Non-binary children are also more likely to be bullied online than girls or boys, but less likely to report this.

**LGBTQIA+ children** are also at high risk of being bullied online. When targeted directly because of their sexual orientation, this constitutes abuse or hate (see Abuse and hate content section (Section 7.4) within this volume). However, the evidence indicates that they are disproportionately at risk of bullying online in general.

Several studies found that children with **mental health conditions** or **disabilities** were more likely than those without these conditions to be bullied online, and that the impact is worse for these children. There are also some indicators that children in receipt of **free school meals** are more likely to be bullied online.

#### *Service type risk factors:*

Bullying content is particularly likely to occur on **social media** and **gaming services**. As a result, these two service types have been included in the draft Children’s Risk Profiles.<sup>610</sup>

Social media is more likely than other service types to serve bullying content. The likelihood of this increases by age, reflecting children’s growing use of social media from primary to secondary school age. Girls are more likely to experience bullying on social media, whereas boys are more likely than girls to be bullied via online gaming. However, this may be due to their relative likelihood of using each service.

*Functionalities and recommender systems risk factors:*

**Anonymous profiles** can make it easier for users to engage in bullying behaviour, and exacerbates the harm to the targeted individual because the identity of the tormentor is unknown, making it harder for action to be taken against them. This functionality is therefore included in the draft Children’s Risk Profiles.

Bullying content is also sent using messaging functionalities. **Direct messaging** is used more frequently than group messaging for this kind of behaviour, and if not moderated will therefore be more likely to go unnoticed by the service, unless reported. **Group messaging** can be used in two ways: to increase the humiliation of the targeted individual by reaching a wider audience, and by excluding an individual from the chat as a bullying tactic which can form part of a campaign of mistreatment. Due to their role in enabling bullying, these functionalities have been included in the draft Children’s Risk Profiles. **Ephemeral messaging**<sup>611</sup> is a functionality that some research respondents felt limited their ability to collect evidence of bullying, making it more difficult for those in authority to intervene, to hold perpetrators to account or to resolve issues.

Negatively **commenting** on content and **re-posting or sharing content** about others were all reported as bullying behaviour, and have been included in the draft Children’s Risk Profiles.

Other functionalities play a role in enabling bullying online. Bullying content is often shared via **posting content**, while having a **geographic location** shared in a user’s profile presents a risk of bullying behaviours being escalated offline. Users can also sometimes make **fake user profiles** from which they can impersonate and target individuals in bullying campaigns.

The ability to capture images and videos, via **screenshots and recordings**, may enable bullying content to be shared further. Although this function can help targeted individuals to collate evidence of bullying, it can also deter some from doing so. If an online service sends a notification when a user takes a screenshot of someone else’s content, it can discourage them from collating the evidence.

Bullying behaviour online can involve **editing** content, such as memes, in order to create a harmful effect. Editing via GenAI software can create bullying content that can be posted on U2U services, or shared with other users by other means such as messages or comments.

---

<sup>610</sup> The draft Children’s Risk Profiles identify risk factors that the draft Children’s Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These draft Children’s Risk Profiles are published as part of our draft Children’s Risk Assessment Guidance for services (Annex A6), as services must take account of them when doing their own risk assessments.

<sup>611</sup> User-to-user service functionality that allows users to send messages that are automatically deleted after they are viewed by the recipient, or after a prescribed period of time has elapsed.



- 7.5.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by **bullying content** on user-to-user (U2U) services ('risk of harm'). This kind of content has been designated as Priority Content that is harmful to children, as defined in the Online Safety Act 2023 ('the Act').<sup>612</sup>
- 7.5.2 Many research sources use the term 'cyberbullying' within their analysis when referring to bullying content and behaviour online. In line with the Act, we use the term 'bullying content' or 'bullying online' throughout this section, unless citing specific evidence using different terminology.
- 7.5.3 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section 7) within this volume. 'Harm' means physical or psychological harm. Harm can be cumulative or indirect.
- 7.5.4 Content may, in particular, be 'bullying content' if it is targeted against a person and:
- a) conveys a serious threat;
  - b) is humiliating or degrading; or
  - c) forms part of a campaign of mistreatment.
- 7.5.5 In the draft Guidance on Content Harmful to Children (Section 8.7) later in this volume, we provide guidance on identifying bullying content, including examples of what Ofcom considers to be, or considers not to be, bullying content. Contextual factors are particularly important to consider when identifying bullying content. Examples include content that persistently or repetitively targets individuals or groups with offensive or otherwise harmful content, content depicting or relating to a specific individual in an offensive or otherwise harmful way, shared without their consent in order to humiliate, pile-ons,<sup>613</sup> or serious threats or aggressive behaviours. For more detail and contextual considerations, please refer to Guidance on violent content (Section 8.8).
- 7.5.6 Bullying content may therefore overlap with other kinds of harmful content. Bullying content can often be aimed at individuals from certain groups, for example because of race, religion, gender or sexual orientation. Content targeting individuals based on listed characteristics is covered in the Abuse and hate content section (Section 7.4) within this volume. Within this section, we focus on bullying online more generally, not where it is targeting listed characteristics. However, there is evidence to suggest that children in certain groups (for example, girls, LGBTQIA+ children, children with disabilities) may be at a higher risk of bullying content that does not target these characteristics. See sub-section 'User base' within this section for more information. Bullying content may also overlap with content which encourages self-harm or suicide (see Section 7.2 for more detail) or as part of a campaign of mistreatment involving violent content (see Section 7.6).
- 7.5.7 The literature in this area explores bullying as a behaviour, as well as bullying content. Bullying behaviours which happen online generally involve the sharing of content that might be considered bullying content. However, certain forms of bullying behaviour, such as deliberately excluding others from online chats or spaces, may form part of a wider

---

<sup>612</sup> Section 62(5) of the Act.

<sup>613</sup> Refers to when a user is criticized or targeted by a large number of other users, often as part of bullying campaigns.

bullying campaign. This section will therefore focus on both, considering bullying content in its analysis and drawing on evidence relating to bullying as a behaviour.

- 7.5.8 Some research in this area avoids the term ‘bullying’, preferring to ask respondents more generally about ‘negative experiences’, as children can be unwilling to report bullying. It is then the researchers’ own interpretation as to which of these experiences represent bullying content or behaviour. For the purposes of this section, the definition used by each survey has been footnoted for reference.

## How bullying content manifests online

---

- 7.5.9 This sub-section looks at how bullying content manifests online and how children may be at risk of harm.
- 7.5.10 Bullying is often a continuation or escalation of behaviour which begins offline. Online spaces can then provide an additional forum for the bullying to continue.<sup>614</sup> Ofcom research shows that bullying through ‘communications technology’ is actually more likely to occur than bullying in person.<sup>615</sup> The Anti-Bullying Alliance told Ofcom that children often refer to online bullying as ‘another tool in the toolbox’ for children to bully, rather than it being something separate from bullying face-to-face.<sup>616</sup> Ofcom research in 2022 among 7-17-year-olds found that children who were experiencing bullying offline appeared to be more likely to experience it online as a result.<sup>617</sup>
- 7.5.11 The characteristics of the online environment may also encourage bullying behaviours and content. The potential for anonymity enables a person to ‘disassociate’ themselves from their bullying behaviour so that they don’t have to own or acknowledge it, and can therefore adopt different behaviours and social norms in their offline interactions. This anonymity may also enable those conducting the bullying to trivialise the consequences of it. The phenomenon of users acting differently online to how they would in real life is termed in the literature as the ‘online disinhibition effect’. The negative effect is termed ‘toxic inhibition’.<sup>618</sup> The effect of toxic inhibition was raised in Ofcom research among 12-17-year-olds, practitioners and school staff, who deemed that being anonymous or ‘behind a screen’ reduced the repercussions or consequences of bullying.<sup>619</sup> The risk of children being bullied by people not personally known to them is heightened online.

---

<sup>614</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>615</sup> Among those who were bullied, 90% experienced it via communications technology,\* and 53% in person. \*Note that ‘communications technology’ includes: text or messaging apps, social media, online games, phone calls, video calls, other sites and apps. When considering user-to-user (U2U) services likely to be accessed by children, and which are in scope of the Act, the figure becomes 71% for communications technology (this excludes phone calls, and text and messaging apps; while messaging apps are in-scope, texts and phone calls are not, therefore these have been removed for this calculation). Data is not contained within the published data tables, but can be derived via calculation from the published SPSS files. Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>616</sup> Ofcom, 2023. [Anti-Bullying Alliance response](#) to 2023 Protection of Children Call for Evidence.

<sup>617</sup> A 17-year-old participant had experienced various kinds of bullying at school, which had transitioned online during the first Covid lockdown in 2020. Another participant, a 14-year-old boy, had fallen out with some of his friends offline, after which they began to bully him online. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>618</sup> Suler, J, 2004. [The Online Disinhibition Effect](#). *CyberPsychology & Behaviour*. [accessed 28 March 2024].

<sup>619</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

- 7.5.12 Online services enable bullying content to be shared quickly and widely, which can exacerbate harmful affects. Various organisations observe that bullying content has the capacity to reach a wide audience, escalating quickly if it is shared or commented on.<sup>620</sup>  
<sup>621</sup>
- 7.5.13 Bullying content can also feel inescapable, following a child wherever they go, and can happen at any time, day or night. Online services also have a range of functionalities which can enable bad actors to target individuals in different ways; not only direct, targeted harassment, but also the creation and sharing of material.<sup>622</sup>

## Presence

- 7.5.14 Overall, studies show that up to one in four children have ever been targeted by bullying content online: this ranges from 8% to 24%, depending on the kind of bullying content or behaviour, the age range, and the data source.<sup>623</sup>
- 7.5.15 Children experience bullying online both by people known to them and by strangers. A fifth of all children aged 8-17 have been bullied online by people they know.<sup>624</sup> Evidence

---

<sup>620</sup> The Children’s Society and YoungMinds, 2018. [Safety Net: Cyberbullying's impact on young people's health. Inquiry report.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>621</sup> United Nations: UN Special Representative of the Secretary-General on Violence Against Children. [Bullying and Cyberbullying.](#) [accessed 1 March 2024].

<sup>622</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>623</sup> Data shows that 10% of school-age children in England said they had been bullied online (22% said it had happened *both* online and in person). Source: Department for Education, 2023. [National behaviour survey – Findings from Academic Year 2021/2022.](#) [accessed 28 March 2024]. Subsequent references to this report throughout; Data shows that 17% of 9-15s had *ever* experienced ‘bullying/abusive or upsetting messages/comments online from people you know’. Source: Internet Matters, 2023. [Children's Wellbeing in a Digital World: Year Two Index Report 2023.](#) [accessed 28 March 2024]. Subsequent references to this report throughout; Data shows that 18.7% of 10-15s had experienced at least one kind of bullying behaviour online. Source: Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020.](#) [accessed 28 March 2024]. Subsequent references to this report throughout; Data shows that 23% of 8-17s had ever had someone be ‘nasty or hurtful’ to them via an online method (i.e. via social media, online games, video calls, or other sites/apps) – this is then interpreted as bullying within the report. Data referred to here has been rebased on all respondents who go online (whereas the published data tables are based on those who opted to answer the question). Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#); Data shows that 24% of children and young adults aged 4-18 in England said they had *ever* experienced ‘other pupils are mean or rude to me online’, which the report terms as ‘cyber victimisation’. Source: Anti-Bullying Alliance, 2022. [Bullying, school experiences and wellbeing: a picture of pupil experience in England 2022.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>624</sup> Data shows that 15% of children aged 9-15 had experienced receiving ‘abusive or upsetting messages from people you know in real life’ and 17% experienced ‘bullying/abusive or upsetting message/comments online from people you know’. Source: Internet Matters, 2023. [Children's Wellbeing in a Digital World: Year Two Index Report 2023](#); Data shows that 18.9% of 8-17s experienced ‘bullying from people you know’. Source: Nominet Social Impact, 2023. [Digital Youth Index](#) Interactive portal. Portal pathway used: *Topic = Internet safety / Question = Have you ever seen or experienced any of the following while online? / Results refined by Age filter: 8-17s.* [accessed 28 March 2024]; Data shows that 18% of 12-18-year-olds had ‘something mean’ posted about them online by people they knew offline (plus 8% by people they knew online). Source: Ditch the Label, 2021. [Wireless Report 2021.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

on the proportions of children being bullied online by a stranger is more sketchy, but it indicates that up to a fifth of all children have experienced this.<sup>625</sup>

- 7.5.16 The effect of bullying content is not restricted to those who are targeted by it; children are also witnessing others being bullied online. Ofcom's 2023 research on online experiences found that up to one in seven UK children aged 13-17 (between 6% and 14%) had seen or experienced some form of bullying behaviour online, over a four-week period.<sup>626</sup> The NSPCC reported in 2019 that a quarter of primary school children said they had seen others bullied online (25%), rising to a third of those in secondary school (33%).<sup>627</sup> This increased likelihood among older children was echoed in 2017 research: 68% of 13-17s said they had seen images or videos that were 'mean, or bully someone', compared to 47% of 8-12-year-olds.<sup>628</sup>
- 7.5.17 The sharing of bullying content is particularly common during school time. The 2020 Crime Survey for England and Wales found that almost three-quarters of children aged 10-15 (72%) had experienced online bullying during school time: 19% said it all happened during school time, and 52.9% said some of it happened during school time.<sup>629</sup> The Professionals Online Safety Helpline reported that during 2022, 10% of its calls were from school settings regarding 'cyberbullying'.<sup>630</sup>
- 7.5.18 The proportion of children both being bullied, and encountering bullying content, is likely to be under-reported, given the challenges in identifying bullying content. Ofcom research reports children acknowledging that it can be hard to distinguish between 'cyberbullying' and behaviour that some might describe as 'jokes' or 'banter' but which could be unintentionally harmful.<sup>631</sup> Other research found that a quarter of 11-16-year-olds (26%) said they had experienced 'banter that went too far',<sup>632</sup> and that 10-12-year-olds felt confused when trying to distinguish between jokes and 'mean' behaviour

---

<sup>625</sup> Data shows that 5% of 12-18-year-olds had 'something mean' posted about them online by people they did not know, and 8% by an anonymous account. Source: Ditch the Label, 2021. [Wireless Report 2021](#); Data shows that 20.1% of 8-17s experienced 'bullying from people you don't know'. Source: Nominet Social Impact, 2023. [Digital Youth Index](#) Interactive portal. Portal pathway used: *Topic = Internet safety / Question = Have you ever seen or experienced any of the following while online? / Results refined by Age filter: 8-17s*. [accessed 28 March 2024].

<sup>626</sup> The kinds of bullying experienced included: 23% 'trolling' (i.e. a person who says something to cause intentional upset or provoke a negative reaction)', 16% 'one-off abusive behaviour or threats', 14% 'group shaming, boycotting, or excluding someone based on their views, opinions or actions' (including online 'pile-ons'), 11% 'people pretending to be another person (e.g. catfishing)', 11% 'private conversations being shared without their consent', 7% 'persistent bullying online', 7% 'stalking, cyberstalking or harassing behaviour', 6% 'private/intimate information made public' (e.g. 'doxxing'). Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>627</sup> NSPCC, 2019. [How safe are our children? An overview of data on child abuse online](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>628</sup> UK Safer Internet Centre, 2017. [Power of Image: A report into the influence of images and videos in young people's digital lives](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>629</sup> Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020](#).

<sup>630</sup> More calls were made about this from 'secondary settings' than primary ones (29 calls vs 9 calls). However, the study notes that the helpline is used far more by secondary settings, which could explain this difference (3,401 cases tagged as secondary, vs 109 tagged as primary). Source: Prof Phippen, A, 2022. [Professionals Online Safety Helpline Analysis 2021-2022 Exploring the Issues Professionals Face in Supporting Young People with Staying Safe Online](#) [accessed 28 March 2024].

<sup>631</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>632</sup> Family Kids & Youth, The Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry, 2016. [Cyberbullying: Research into the attitudes of 11-16 year olds, Quantitative Findings](#). [accessed 28 March 2024]. Subsequent references to this report throughout.

online.<sup>633</sup> As a result, children who are bullied online do not always recognise it as such,<sup>634</sup>  
<sup>635</sup> while others might not realise they are engaging in bullying behaviours themselves.<sup>636</sup>

- 7.5.19 Certain groups are more likely to be bullied online, such as girls, non-binary children, LGBTQIA+ children, older children, and those with mental health conditions or disabilities. Disproportionate risk to children in certain groups is discussed in detail in the sub-section ‘User base’ within this section. However, the evidence is not clear as to whether they are more likely to be targeted *because of* these characteristics. Content that targets characteristics such as these is covered in the Abuse and hate content section (Section 7.4) within this volume.

## Impacts

- 7.5.20 Being bullied online can have a wide range of harms on children, affecting their emotional wellbeing, their mental and physical health, and their social participation and engagement.
- 7.5.21 Bullying content and bullying behaviour online is a concern for children. Up to half of 13-17-year-olds report being ‘highly concerned’ about trolling<sup>637</sup> (50%), one-off abusive behaviour or threats (48%), and ‘griefing during gaming’<sup>638</sup> (38%) online.<sup>639</sup>
- 7.5.22 The inescapability and the public nature of bullying online can be traumatic for children. Ofcom research with 12–17-year-olds, youth practitioners and school staff found that the permanence of bullying content online, and the risk of it being spread more widely, contributed to ongoing experiences of trauma,<sup>640</sup> adding to the cumulative effect of harm.
- 7.5.23 Psychological harms are extensive. The Crime Survey for England and Wales noted that almost seven in ten children aged 10-15 (68%) were emotionally affected, to some extent, by the online bullying they had experienced (22% were affected a lot by the incidents, and 47% were affected a little).<sup>641</sup> Fear emerges as a common emotional response. Internet Matters reported that almost two-thirds of 9-16s (64%) found their online bullying

---

<sup>633</sup> Children’s Commissioner, 2018. [Life in ‘likes’: Children’s Commissioner report into social media use among 8-12 year olds](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>634</sup> Among children aged 10-15 who had experienced bullying online, 52% said they would not describe the behaviours as bullying. Source: Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020](#).

<sup>635</sup> Among children aged 11-16 who reported experiencing ‘something online that had upset or really hurt them’, 65% did not define these as cyberbullying. Source: Family Kids & Youth, The Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry, 2016. [Cyberbullying: Research into the attitudes of 11-16 year olds, Quantitative Findings](#).

<sup>636</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>637</sup> The full definition in the research study for this kind of content was ‘trolling, i.e. a person who says something to cause intentional upset or provoke a negative reaction’.

<sup>638</sup> The full definition in the research study for this kind of content (i.e. ‘griefing’) was ‘intentional harassment during gaming’.

<sup>639</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>640</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>641</sup> The Crime Survey for England and Wales is a self-reporting survey, which asks people resident in households about their experiences of a range of ‘offences’ in the 12 months before the interview; however, these offences are not necessarily reported to the police. Source: Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020](#).

experience<sup>642</sup> scary, including 20% who found it ‘very scary’. Being bullied online by people known ‘in real life’<sup>643</sup> caused higher levels of distress: more than three-quarters of 9-16s (77%) reported being scared by this experience, including 30% who found it ‘very scary’.<sup>644</sup>

- 7.5.24 Extreme psychological harm from bullying can lead to self-harm and suicide in children.<sup>645</sup> The helpline service Childline<sup>646</sup> reports handling children in states of desperation on account of bullying.<sup>647</sup> Findings from an inquest in January 2024 concluded that 14-year-old Mia Janin had taken her own life in March 2021 after being bullied by boys at her school, both in person and online (see sub-section ‘User communication’ within this section).<sup>648</sup> This is also reflected in Ofcom’s research in which school staff and youth practitioners said that, in their experience, a small number of children being bullied engaged in forms of self-harm and suicidal ideation.<sup>649</sup> These findings are not new – in 2010, a European study among 11-16-year-olds found that those involved in bullying online in some way (either as a victim, or the individual displaying the bullying behaviour) were more likely than those with no involvement in bullying to view self-harm or suicide-related web-content.<sup>650</sup>
- 7.5.25 Being targeted by bullying content can also cause children to isolate themselves socially. Some children withdraw from online spaces, leading to isolation and losing contact with friends online. Children can also withdraw from physical spaces, being reluctant to leave their homes to socialise with friends, as well as non-attendance in education, employment, and training.<sup>651</sup>
- 7.5.26 Bullying (both being bullied or engaging in bullying behaviours) is also linked to poor experiences at school. The Anti-Bullying Alliance reported that children who had *never* experienced online bullying (or bullying in person) were more positive about their school

---

<sup>642</sup> Online bullying experience in this study defined as: ‘*experiencing bullying/abusive or upsetting messages/comments online from people you know*’.

<sup>643</sup> The bullying experienced here is defined in the study as: ‘*receive abusive or upsetting messages from people you know in real life*’.

<sup>644</sup> Internet Matters, 2023. [Children's Wellbeing in a Digital World: Year Two Index Report 2023](#).

<sup>645</sup> The NSPCC reports how ‘at its worst, bullying has driven children and young people to self-harm and even suicide’. Source: NSPCC. [Bullying and cyberbullying: Effects of bullying](#). [accessed 1 March 2024].

<sup>646</sup> Childline is a free, private and confidential service provided by the NSPCC for children to use to talk through any issues they are going through: [About Childline | Childline](#) [accessed 14 February 2024].

<sup>647</sup> “*Every day I wake up scared to go to school, scared about the comments people will make and scared about walking home. Then I get in and log onto my social networking site and there are horrible messages everywhere. It’s like there’s no escaping the bullies. I’m struggling to cope with how upset I feel so sometimes I cut myself just to have a release but it’s not enough. I can’t go on like this.*” (quote from Childline counselling session with a girl aged 13). Source: NSPCC. [Protecting children from bullying and cyberbullying](#) [accessed 1 March 2024].

<sup>648</sup> Lynn, G., 2024. [Mia Janin took own life after bullying – inquest](#). BBC, 26 January. [accessed 14 February 2024]. Subsequent references to this article throughout.

<sup>649</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>650</sup> Those who had been both a bully and a victim (‘bully-victim’) were the most likely to seek out these kinds of content (30% self-harm content, 16% suicide content). A fifth of both ‘victim only’ and ‘bully only’ respondents sought self-harm content; but those who were ‘victim only’ were more likely to seek suicide content than those who were ‘bully only’ (12% vs 6%). Based on a study of 19,406 11-16-year-olds, of whom 6% reported being a ‘cybervictim’, 2.4% a ‘cyberbully’, and 1.7% a ‘cyberbully-victim’. Source: Gorzig, A, 2016. [Adolescents’ viewing of suicide-related web-content and psychological problems: Differentiating the roles of cyberbullying involvement](#) [accessed 1 March 2024].

<sup>651</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).



experience than those who had been bullied. The same was found for those who did not engage in any bullying behaviours (whether online or in person); they were more positive about school than those who bullied.<sup>652</sup> This effect is heightened for children with SEND or disabilities (see sub-section ‘User base’ within this section for more information).

- 7.5.27 Psychological harms can have lasting effects. A 2018 inquiry into the ‘impact [of cyberbullying] on young people’s mental health’ heard how being bullied online, and the psychological trauma that can come with it, increases the chances that a child will go on to have poor social and health outcomes throughout their life.<sup>653</sup>
- 7.5.28 Being targeted can also lead to children engaging in bullying behaviours themselves. The target of the bullying can turn to bullying tactics themselves in retaliation, causing further harm. Ofcom research found there is not always a clear distinction between the children displaying, and those affected by, bullying behaviours online. In some instances, both parties might be perceived as aggressors at different points, with the targeted person using bullying behaviour as a defence mechanism.<sup>654</sup>
- 7.5.29 Those who encounter bullying content can also be adversely affected, even if they are not the direct target. There is evidence to suggest children can become desensitised to bullying content, with ‘bystanders’ online displaying higher moral disengagement and lower feelings of responsibility than those who witness bullying in person in school.<sup>655</sup> This suggests that online bullying content is normalising bullying behaviour for some children.
- 7.5.30 The effects of bullying can prompt action; bullying is one of the most-reported kinds of harm online. The NSPCC compiled reviews from children aged 11-18 of the 40 most popular sites, apps and games (at the time of fieldwork in 2017/18), and found that bullying was the most commonly reported form of ‘inappropriate content’ (18%).<sup>656</sup> Analysis conducted on the UK’s Report Harmful Content Service<sup>657</sup> found that during 2021 and 2022,<sup>658</sup> of the 2,195 enquiries made, 754 were about bullying and harassment online (the harm most frequently reported).<sup>659</sup>

---

<sup>652</sup> Anti-Bullying Alliance, 2022. [Bullying, school experiences and wellbeing: a picture of pupil experience in England 2022](#).

<sup>653</sup> The Children’s Society and YoungMinds, 2018. [Safety Net: Cyberbullying’s impact on young people’s health. Inquiry report summary](#).

<sup>654</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>655</sup> Unicef (Stoilova, M., Livingstone, S., and Khazbak, R), 2021. [Investigating Risks and Opportunities for Children in a Digital World: A rapid review of the evidence on children’s internet use and outcomes](#). [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>656</sup> The other kinds of inappropriate content reported were violence and hatred (16%), sexual content (16%), drink, drugs and crime (12%), and suicide and self-harm (11%). Source: NSPCC, 2019. [How safe are our children? An overview of data on child abuse online](#).

<sup>657</sup> Report Harmful Content (RHC) is a national impartial dispute resolution service that has been designed to assist everyone with reporting harmful content online. RHC is provided by the UK Safer Internet Centre and operated by SWGfL.

<sup>658</sup> The period covered was April 2021 to November 2022.

<sup>659</sup> Evidence does not state the range of ages making the reports to the service. Source: SwgFL, 2022. [Report Harmful Content Annual Report 2022](#). [accessed 19 April 2024].



## Evidence of risk factors on user-to-user services

---

7.5.31 We consider that the risk factors below may increase the risk of harm to children relating to bullying content. This is also summarised in the grey box at the start of this section.

### Risk factors: User base

#### User base size

7.5.32 As bullying is targeted at an individual, there is no specific evidence on how the user base size of a service can affect the risk of bullying online.

7.5.33 However, some studies mentioned earlier in this section suggest that services with a larger user base can spread bullying content to wider audiences. This can thereby intensify the harm on the person being bullied.

7.5.34 As mentioned in the 'How bullying content manifests online' sub-section within this section, bullying content is often a continuation or escalation of bullying which begins in person. This therefore suggests that it could happen on a service where both the person engaging in the bullying behaviours and the target are present.

#### User demographics

7.5.35 The following sub-section outlines the evidence of user base demographic factors that impact the risk of harm to children, which can include listed characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.

7.5.36 Data suggests that user base characteristics including **age, gender, gender identity and sexual orientation, mental health and disability, and socio-economic factors** could lead to an increased risk of harm to children in different age groups.

7.5.37 As mentioned earlier, bullying that targets listed characteristics is likely to be considered abuse or hate content. This is discussed in detail in the Abuse and hate content section (Section 7.4) within this volume. However, evidence relating to the disproportionate risk of different groups being bullied is set out in this section on bullying.

#### Age

7.5.38 Evidence suggests that children in secondary school are more at risk, than younger children, of encountering or being targeted by bullying content. Recent evidence shows that parents of secondary-school-aged children in England who had been bullied were significantly more likely than parents of primary-aged children to say that the bullying the child had experienced had happened online (26% vs 8%).<sup>660</sup> Findings from 2014 showed that online bullying<sup>661</sup> increased by age, for both girls and boys. Fifteen-year-old girls in England were twice as likely to experience online bullying than 11-year-old girls (31% vs 16%), while 16% of 15-year-old boys experienced it compared to 10% of 11-year-old boys.<sup>662</sup> This may be because friendships among teenagers are more intense, so that

---

<sup>660</sup> Department for Education, 2023. [National behaviour survey – Findings from Academic Year 2021/2022.](#)

<sup>661</sup> Online bullying in this study included via messages, photographs and pictures. Respondents were asked if they had experienced these in the previous two months.

<sup>662</sup> Brooks, F., Magnusson, J., Klemmer, E., Chester, K., Spencer, N., and Smeeton, N., 2015. [HBCS England National Report 2014. University of Hertfordshire; Hatfield, UK.](#)

bullying related to friendship breakdowns are more common for this age group,<sup>663</sup> alongside their higher use of online services.<sup>664</sup>

- 7.5.39 Nevertheless, Ofcom's 2023 qualitative research suggests that younger children (including primary-school-aged children) are increasingly being affected by online bullying. School staff and youth practitioners attributed this to younger children's increased access to devices and the internet, which can increase opportunities for others to contact them with bullying content.<sup>665</sup>

### *Gender*

- 7.5.40 Most evidence suggests that girls are at higher risk than boys of being targeted by bullying content online, especially by certain kinds of bullying content. A recent study by Internet Matters, among 13-16-year-old girls, found that they had received and observed 'hateful comments' on popular social media platforms. These were in response to both content they had posted and content posted by others, and typically targeted girls' appearance such as clothes, weight or bodies, which participants said impacted on their wellbeing. The participants attributed the comments to men and boys and noticed a lack of similar comments on boys' videos.<sup>666</sup>
- 7.5.41 Ofcom research on online experiences notes that girls aged 13-17 are more likely than boys the same age to experience two other kinds of bullying behaviour online: private conversations being shared without their consent (14% vs 7%) and stalking or harassing behaviour (9% vs 5%).<sup>667</sup>
- 7.5.42 Ofcom's research into online bullying presents several potential reasons for disproportionate harm to girls. Misogyny and sexism were reported as commonplace among children by school staff included in the study. While content explicitly targeting women because of their gender constitutes abuse or hate (see Abuse and hate content section (Section 7.4) within this volume), a culture of misogyny may underpin the more critical and aggressive attitude towards girls more generally – especially towards their physical appearance.<sup>668</sup>
- 7.5.43 However, higher proportions of boys may be being bullied online than the evidence suggests. Several studies find that boys respond differently to being bullied, and are less likely than girls to report the bullying.
- 7.5.44 Ofcom research found that boys are equally affected as girls by online bullying, but are less likely to speak up about it or report it.<sup>669</sup> A further study among 11-16-year-olds found that while children in general were embarrassed about being bullied online, boys in particular found it difficult to disclose that they had been bullied. Almost half the boys in the study (48%) said they would 'rather cope with cyberbullying than tell anyone else about it', compared to 38% of girls. Among those who had experienced bullying online,

---

<sup>663</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>664</sup> See overview of child behaviours in the introduction.

<sup>665</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>666</sup> Internet Matters, March 2024. [So standard its not noteworthy -Teen girls' experiences of harm online. "So standard it's not noteworthy" - Teenage girls' experiences of harm online](#) [accessed 17 April 2024].

<sup>667</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>668</sup> There was a perception among youth practitioners and schools staff that girls are thought to post more images or videos on which they could be attacked based on their physical appearance. Source: Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>669</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

boys were more likely than girls to have not told anyone about the experience (12% vs 3%).<sup>670</sup>

- 7.5.45 Older boys are particularly unlikely to report bullying. In an Irish study with 8-16-year-olds, two-fifths of boys aged 8-12 (39%) kept it to themselves, compared to a fifth of girls this age (21%). This increased to 46% of older boys aged 12-16, compared to 28% of girls this age.<sup>671</sup>
- 7.5.46 Some studies suggest that boys may be more likely than girls to experience bullying in gaming contexts; Ofcom research found this in two separate studies. Research on online experiences found that 17% of boys aged 13-17 had seen or experienced ‘intentional harassment during gaming, i.e. ‘griefing’, compared to 6% of girls this age.<sup>672</sup> Ofcom’s media literacy research found that boys aged 8-17 were more likely than girls to encounter ‘nasty or hurtful’ behaviour within online games (14% compared to 8% of girls).<sup>673</sup> A review by Unicef found that boys experienced bullying online mainly through video games, while girls experienced it mainly through social media.<sup>674</sup> However, Ofcom’s media literacy research also shows that boys are generally more likely to game online than girls, so their greater use of these services may explain the higher proportions being bullied there.<sup>675</sup>

#### *Gender identity and sexual orientation*

- 7.5.47 Children who are non-binary are particularly likely to report having experienced bullying. Research in Ireland among 12-16s found that 74% of those identifying as non-binary experienced bullying, compared to 43% of girls and 30% of boys. Moreover, this group are particularly likely to keep it to themselves (64% of 12-16 year-olds, compared to 28% of girls and 46% of boys).<sup>676</sup>
- 7.5.48 LGBTQIA+<sup>677</sup> children are also at a high risk of being bullied online. Much of this would be considered abuse and hate content.<sup>678</sup> Evidence measuring the proportion of LGBTQIA+ children experiencing bullying, beyond direct homophobia, biphobia or transphobia, is limited. However, the Trevor Report in the USA found that 42% of LGBTQ children and

---

<sup>670</sup> Family Kids & Youth, The Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry, 2016. [Cyberbullying: Research into the attitudes of 11-16 year olds, Quantitative Findings](#).

<sup>671</sup> Cybersafe Kids (Beresford, O., Cooney, A., Keogh, A., Flynn, E., and Messina, M.), 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#). [accessed 28 March 2024]. Subsequent references to report throughout.

<sup>672</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>673</sup> Data referred to here has been rebased on all respondents (whereas the published data tables are based on those who opted to answer the question). Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>674</sup> Unicef, 2021. [Investigating Risks and Opportunities for Children in a Digital World](#).

<sup>675</sup> The study shows that 88% of boys aged 13-15 game online, compared to 67% of girls this age; and 89% of boys aged 16-17 game online, compared to 69% of girls this age. Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>676</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#).

<sup>677</sup> LGBTQ+ is the acronym for lesbian, gay, bi, trans, queer, questioning and ace. Source: Stonewall. [Stonewall list of LGBTQ+ terms](#). [accessed 18 January 2024].

<sup>678</sup> Research in 2017 from LGBTQ+ charity Stonewall found that two in five LGBT children and young adults aged 11-19 across Britain (40%) have been the target of homophobic, biphobic and transphobic abuse online. In particular, nearly three in five trans children and young adults (58%) have received this abuse online. Even if not directly targeted by homophobic, biphobic and transphobic bullying online, many LGBT children and young adults witness homophobia, biphobia and transphobia online regularly. Nearly all LGBT young people in the study said they had seen this kind of content (97%), with 43% saying they see it ‘often’. Source: Stonewall, 2017. [School Report: The experiences of lesbian, gay, bi and trans young people in Britain’s schools in 2017](#).

young adults (aged 13-24) were bullied ‘electronically’,<sup>679</sup> indicating that a similarly high proportion of LGBTQ+ children may be experiencing online bullying in UK.

- 7.5.49 The combination of gender identity and sexuality can increase the risk of being bullied. The Trevor Report, noted above, found that transgender and non-binary students reported higher rates of bullying online (50%) than cisgender LGBTQ students (35%).

#### *Mental health and disability*

- 7.5.50 Several studies focusing on children in England in 2022 reported that those with mental or physical health conditions or disabilities were more likely to be bullied online than those without these conditions. Some aspects of the bullying may explicitly target their health or disability and therefore constitute abuse or hate.<sup>680</sup>
- The Anti Bullying Alliance found that school-aged children (4-18) with SEND were more likely to have ever been bullied online (26%) than those without SEND (23%).<sup>681</sup>
  - The NHS also reported that children aged 11-16 who used social media and who had a ‘probable mental disorder’<sup>682</sup> were more likely to report they had been bullied online (29.4%), than those ‘unlikely to have a mental disorder’ (7.9%).<sup>683</sup>
  - Among children across England and Wales aged 10-15, the presence of online bullying was higher for those with a long-term illness or disability (26%) than those without (18%).<sup>684</sup>
- 7.5.51 For this group, the effects of encountering bullying content are heightened. Ofcom’s research with school staff and youth practitioners suggests that children with special educational needs and disabilities (SEND) might experience a worsening of their existing challenges, such as absences from school and their associated educational attainment.<sup>685</sup>

#### *Socio-economic factors*

- 7.5.52 Some socio-economic indicators are associated with a higher risk of being targeted by bullying content. The Anti-Bullying Alliance found in 2022 that school-aged children who received free school meals were more likely to have ever been bullied online (28%) than those who did not (21%).<sup>686</sup>

---

<sup>679</sup> Electronic bullying was examined using the question, “During the past 12 months, have you been electronically bullied? Count being bullied through texting, Instagram, Facebook, or other social media.” Source: The Trevor Project, 2021. [The Trevor Project Research Brief: Bullying and Suicide Risk among LGBTQ Youth](#). [accessed 28 March 2024].

<sup>680</sup> Bullying which targets a person’s listed characteristics, such as a disability, is included within the Abuse and hate content section (section 7.4) within this volume.

<sup>681</sup> Anti-Bullying Alliance, 2022. [Bullying, school experiences and wellbeing: a picture of pupil experience in England 2022](#).

<sup>682</sup> The study asks a range of questions about children and young people’s wellbeing and physical health, then uses a symptom scoring process to determine whether the respondent possibly has a mental disorder, probably has one, or is unlikely to have one. The study shows that rates of children aged 7-16 in England with a probable mental disorder have increased from 12.1% in 2017 to 18.0% in 2022.

<sup>683</sup> NHS Digital, 2022. Slides from Webinar: [Mental Health of Children and Young People - Seminar 270123 v2.pptx \(live.com\)](#). [accessed 28 March 2024].

<sup>684</sup> Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020](#).

<sup>685</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>686</sup> Anti-Bullying Alliance, 2022. [Bullying, school experiences and wellbeing: a picture of pupil experience in England 2022](#).

## Risk factors: Service types

7.5.53 Research suggests that the following service types can increase the risk of bullying content manifesting online: **social media** and **gaming services**.

### Service type

#### *Social media services*

7.5.54 Ofcom research on online experiences among respondents<sup>687</sup> found that social media is more likely than other service types<sup>688</sup> to serve *any* form of online bullying content included in the study. In particular, 73% of those who had experienced trolling<sup>689</sup> and 64% of those who had experienced persistent bullying online reported that their experience took place on a social media service.<sup>690</sup>

7.5.55 Ofcom's media literacy research also reported that social media is the most likely service type where 'nasty or hurtful behaviour'<sup>691</sup> is experienced by 8-17-year-olds (18%). The likelihood of this increased considerably by age (from 18% of 8-12s to 36% of 13-17s), and was more likely to happen to girls (21%) than boys (14%).<sup>692</sup>

#### *Gaming services*

7.5.56 Several studies suggest that gaming services are also a common site for bullying content and behaviour. Ofcom research on online experiences found that 12% of children aged 13-17 had seen or experienced 'intentional harassment during gaming, i.e. 'griefing'<sup>693</sup>. Ofcom media literacy research reports that online games were the second most likely place for 'nasty or hurtful' behaviour to occur among children aged 8-17 (11%, after social

---

<sup>687</sup> The sample size of children (aged 13-17) who experienced each harm was too low to report on, hence data is shown as overall figure for children and adults. Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>688</sup> The services asked about in this survey were: social media website or app (e.g. Facebook, Twitter, Instagram), a website or app where you view videos posted by other users (e.g. YouTube, TikTok), news website or app (e.g. BBC News, The Guardian, Daily Mail Online), instant messenger website or app (e.g. Facebook Messenger, WhatsApp), email, livestreaming website or app – this could be part of a social media website or app (e.g. Twitch, Facebook Live), a Q&A website or app (e.g. Quora, Yahoo! Answers), a blog website or app (e.g. WordPress, Bloglovin'), the 'dark web', online dating websites or apps (e.g. Tinder, Bumble), search engine (e.g. Google, Yahoo), 'adult' site containing sexual content, shopping website or app (e.g. Amazon, eBay, Depop), gaming website or app (e.g. PlayStation Network, Nintendo Online), video-on-demand application (e.g. Netflix, Now TV), an in-game chat / chat room, Generative AI (e.g. ChatGPT), other.

<sup>689</sup> Trolling is defined in the study as 'trolling, i.e. a person who says something to cause intentional upset or provoke a negative reaction'.

<sup>690</sup> Other bullying content and behaviours experienced by respondents included: 69% 'group shaming, boycotting, or excluding someone based on their views, opinions or actions (including online 'pile-ons')', 66% 'private/intimate information made public (e.g. 'doxxing')', 64% 'stalking, cyberstalking or harassing behaviour', 63% 'one-off abusive behaviour or threats', 62% 'private conversations being shared without their consent', and 46% 'people pretending to be another person (e.g. catfishing)'.

<sup>691</sup> Respondents were provided with this description of nasty or hurtful behaviour: 'People can be nasty or hurtful. It could be behind someone's back, to their face, through calls or texts. It could be by being nasty through social media, games or other websites. It could be by calling people names, leaving them out, or through sharing photos or videos that upset them. It could be threatening to hurt or actually hurting them. It could be done on purpose or as a joke that goes too far.'

<sup>692</sup> Data referred to here has been rebased on all respondents (whereas the published data tables are based on those who opted to answer the question). Source: Ofcom, 2023. [Children's Media Literacy Tracker](#).

<sup>693</sup> Ofcom, 2023. [Online Experiences Tracker](#).

media, at 18%).<sup>694</sup> As mentioned in the sub-section ‘User demographics’ within this section, boys were more likely than girls to experience these kinds of harm within gaming.

- 7.5.57 Specific kinds of online bullying behaviour, such as ‘persistent bullying’ and ‘doxxing,’<sup>695</sup> were also encountered by respondents<sup>696</sup> within in-game chat/chat rooms, as reported by Ofcom research on online experiences.<sup>697</sup> In other Ofcom research, a 14-year-old boy described how he had fallen out with some of his friends offline, after which they began to bully him within a gaming service, including sharing a picture of him with an ‘embarrassing filter’.<sup>698</sup>
- 7.5.58 In a US study among gamers, 60% of the gamers aged 13-17 had experienced some form of bullying in the previous year within online multiplayer games. The most cited kinds were ‘disrupted play (such as trolling or griefing)’ (33%) and ‘being called offensive names’ (29%).<sup>699</sup>
- 7.5.59 Another study found that 7% of children (aged up to 15 and who played any kind of video game) had experienced bullying within gaming,<sup>700</sup> and Ditch the Label reported that 11% of UK children and young adults aged 12-18 said they had been bullied in online games in the previous 12 months.<sup>701</sup> A review by Unicef also found that boys tended to be targeted through video games.<sup>702</sup>
- 7.5.60 Immersive technology in gaming services can also present added risks for encountering bullying behaviour. Ofcom’s research into the use of these technologies among children (aged 13+) and adults found that some participants saw ‘anti-social and abusive behaviour’ as a constant threat, and so they regulated their interactions with other users. These behaviours were both observed and experienced by the participants, and were especially commonplace in a video game context, due to the competitive element, particularly when participants were thought to have ‘negatively impacted’ a team’s performance.<sup>703</sup>

### *Messaging services*

- 7.5.61 The evidence suggests that messaging services are another common area for bullying content, as they can allow more targeted and private behaviour, which may be particularly harmful. Ofcom research shows that, of children aged 8-17 who had been bullied online, the most common way was via messaging apps (and texts) (56%) and social

---

<sup>694</sup> Data referred to here has been rebased on all respondents (whereas the published data tables are based on those who opted to answer the question). Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>695</sup> ‘Doxxing’ is referred to in the research as ‘*private/intimate information made public*’. While this on its own may not appear as bullying, it can be classed as such when it is part of a campaign of mistreatment of a person.

<sup>696</sup> The sample size of children who experienced each harm was too low to report on, hence data is shown as an overall figure for adults and children: 6% of those who reported persistent bullying, and 4% reporting doxing, said that these experiences occurred within in-game chat/chat rooms.

<sup>697</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>698</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>699</sup> ADL, 2021. [Hate is No Game: Harassment and Positive Social Experiences in Online Games 2021](#). [accessed 28 March 2024].

<sup>700</sup> Ipsos MORI, ISFE (Interactive Software Federation of Europe), 2021. [Use of communication features when playing video games](#). [accessed 28 March 2024].

<sup>701</sup> Ditch the Label, 2020. [The Annual Bullying Survey 2020](#). [accessed 28 March 2024].

<sup>702</sup> Unicef, 2021. [Investigating Risks and Opportunities for Children in a Digital World](#).

<sup>703</sup> Ofcom, 2023. [Media literacy, immersive technology and the future](#).



media (51%). Experiencing bullying in these ways online was as likely as in-person bullying to happen to children (53%).<sup>704</sup>

- 7.5.62 The evidence shows that messaging functionalities (see sub-sections on ‘Direct messaging’ and ‘Group messaging’ within this section) are commonly used in bullying campaigns. While not specific to messaging services, this indicates that these services may be used in sharing bullying content, as these functionalities are central to messaging services.

## Risk factors: Functionalities and recommender systems

### User identification

#### *Fake user profiles*

- 7.5.63 Fake accounts, and their associated fake profiles, can be used in bullying campaigns. A study in Ireland among 8-16-year-olds found that about one in 20 had experienced ‘fake profiles used to target/scare me’ (experienced by 3% of 8-12-year-olds and 5% of 12-16s).<sup>705</sup>
- 7.5.64 Fake accounts can be used to impersonate and torment victims. One study reported a 15-year-old being sent a link to a fake account by someone from their school. This fake account was impersonating them and included ‘horrible pictures and comments about them’, which resulted in the participant refusing to go to school until the content had been taken down.<sup>706</sup> Participants in Ofcom research on cyberbullying also noted that the ability to create multiple new accounts, by a single user, allowed them to create fake accounts and was regarded by the participants as reducing the deterrence effect of mitigation measures such as account suspensions and bans.<sup>707</sup>

#### *Anonymous user profiles*

- 7.5.65 Anonymous profiles can make it easier for people to engage in bullying behaviour. As explained earlier in this section, anonymity online can enable a person to ‘dissociate’ themselves from their bullying behaviour so that they don’t have to own or acknowledge it, and can adopt different behaviours and social norms than in their offline interactions. Participants in Ofcom research on cyberbullying reported that communicating from ‘behind a screen, sometimes anonymously’ made it easier for people to make comments they would not make in circumstances where they were more likely to be held accountable.<sup>708</sup>
- 7.5.66 Participants in the above Ofcom study also noted that some online services made it easy for users to conceal their identities, such as those where normal use does not involve posting anything identifiable, or personal content. Users could set up ‘aliases’ or fake accounts to target somebody without disclosing their identity, thereby achieving a degree

---

<sup>704</sup> Data is not contained in the published data tables, but can be derived via calculation from the published SPSS files. Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#).

<sup>705</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#).

<sup>706</sup> Ecorys UK (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 28 March 2024]. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>707</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>708</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).



of anonymity. Youth practitioners in the study reported that children who experienced bullying (both online and offline) sometimes cyberbullied others, suggesting that these children used the anonymity afforded by online platforms in an attempt to assert power and control.<sup>709</sup>

7.5.67 NSPCC research in 2017 reported that posting comments anonymously is often central to bullying behaviour. A 14-year-old respondent described his experience of a video-sharing service: “users are sometimes abusive of their so-called ‘anonymity’ and use it to harass other users”.<sup>710</sup> The youth charity, Ditch the Label, reported that 8% of children aged 12-18 had had ‘something mean posted about them online’ via anonymous accounts.<sup>711</sup>

7.5.68 Anonymity was also said to make the effects of online bullying worse than in-person bullying. Participants in Ofcom research were concerned that mitigation measures might be less effective where the identity of the user engaging in the bullying behaviour was unknown. Not knowing who was involved could also exacerbate children’s anxiety and unease, offline as well as online.<sup>712</sup>

## User networking

### User connections

7.5.69 The ability to form user connections plays a role in experiencing harm from bullying. As explored in the sub-section ‘Presence’ within this section, children can be targeted both by people they know, and by strangers. Messaging functionalities are also commonly used in the context of bullying, and these rely on users to be connected in some way.

## User communication

### Direct messaging

7.5.70 Bullying content is enabled by direct messaging such as written messages or voice notes, according to Ofcom’s research with 12-17-year-olds. Participants in the study also reported that some services allowed other users to message each other without recipient permission, reducing individuals’ control over who could contact them and the kinds of messages to which they might be exposed.<sup>713</sup>

7.5.71 Research into online bullying among 10-15-year-olds in England and Wales found that having ‘nasty messages about them sent to them’ was one of the most common online bullying behaviours reported by children, experienced by one in ten (10.1%).<sup>714</sup> The study noted that ‘private messages’ were used more frequently for one-to-one bullying, and as such were likely to go unnoticed unless the recipient told someone about it.<sup>715</sup>

---

<sup>709</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>710</sup> NSPCC, 2017. [Net Aware Report 2017: “Freedom to express myself safely”, Exploring how young people navigate opportunities and risks in their online lives.](#) [accessed 28 March 2024]. Subsequent references to this report throughout.

<sup>711</sup> Ditch the Label, 2021. [Wireless Report 2021.](#)

<sup>712</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>713</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>714</sup> This behaviour was the most common behaviour, alongside that of having ‘someone called you names, swore at you or insulted you’ (10.5% of children).

<sup>715</sup> Other methods of carrying out online bullying behaviours included posting online messages, images or videos about children, contacting children in a chatroom, and through online games. Source: Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020.](#)

7.5.72 A study in Ireland among 8-16-year-olds who had experienced some form of bullying online noted that one of these bullying behaviours was receiving hurtful messages - experienced by 12% of 8-12-year-olds, and 22% of 12-16-year-olds. There were gender differences among the older age group: non-binary children aged 12-16 were more likely to receive these messages (58%), followed by girls (25%), then boys (12%).<sup>716</sup>

#### *Group messaging*

7.5.73 The less private nature of group messaging or chats can create a context for bullying. Participants in Ofcom research among 12-17-year-olds reported they could be targeted in group chats to which they had been added without their permission, and/or people could be invited to join existing groups where 'conflict or bullying' was already taking place. Practitioners in the study suggested that group or posts in more public contexts could encourage a 'piling-on' effect, a normalisation of negativity, or 'audience-seeking'<sup>717</sup> behaviours.<sup>718</sup> Participants in a recent study by Internet Matters, among 13-16-year-old girls, also discussed how bullying could occur in groups chats, with upsetting and sometimes threatening messages being sent by different people.<sup>719</sup>

7.5.74 In addition, knowing that other members of a group chat would be notified if they left was seen as something that could reduce children's willingness to distance themselves from spaces in which they were being targeted, or were witnessing bullying content.<sup>720</sup>

7.5.75 Content which humiliates or degrades a person, and therefore singles them out within a wider group chat, may not be seen as bullying content to the rest of the group. Participants in one study described instances where group chats were used to make a 'joke' that singled out one person. They commented that the intention behind these could easily be lost, and that 'jokes could be seen to be serious'.<sup>721</sup>

7.5.76 Even when children are not members of group chats, they risk being the target of bullying content that has been shared within the chat. An inquest in January 2024 concluded that 14-year-old Mia Janin had taken her own life in March 2021 after being bullied by boys at her school, both in person and online. The inquest, in particular, heard how boys from her school shared one of her social media videos in a group chat where they 'mocked' her. It was also reported that boys used the group chat to share faked nude photos of girls (see sub-section 'Content editing' within this section).<sup>722</sup> Ofcom research also found that a 14-year-old boy was sent screenshots of a group chat where other children, whom he had been previously friends with, had been 'making fun of him' by 'making jokes about his dad who had passed away some years ago'.<sup>723</sup>

7.5.77 Being excluded from group messaging or chats can be seen as a form of bullying when it is part of a campaign of bullying or mistreatment.<sup>724</sup> Research among 10-15-year-olds in

---

<sup>716</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023.](#)

<sup>717</sup> In this research, audience-seeking behaviour was defined as '*enacting purposeful behaviour in visible spaces with the intention to elicit attention and audience*'.

<sup>718</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>719</sup> Internet Matters, March 2024. [So standard its not noteworthy -Teen girls' experiences of harm online. "So standard it's not noteworthy" - Teenage girls' experiences of harm online.](#)

<sup>720</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>721</sup> Children's Commissioner, 2018. [Life in 'likes': Children's Commissioner report into social media use among 8-12 year olds.](#)

<sup>722</sup> Lynn, G., 2024. [Mia Janin took own life after bullying – inquest.](#) BBC, 26 January.

<sup>723</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>724</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

England and Wales noted that being ‘left out or excluded from a group or activity on purpose’ had been experienced by 6.1% of them in the previous 12 months.<sup>725</sup> Among children aged 8-16 in Ireland who had experienced some form of bullying online, being excluded from group chats was the most likely form (for 15% of 8-12s and 26% of 12-16s).<sup>726</sup> A source from 2016 noted that almost a quarter of 11-16-year-olds had experienced being excluded from a group chat (23%). This was more likely to occur among those aged 15-16 (29%) than 12-13s (17%).<sup>727</sup>

### *Ephemeral messaging*<sup>728</sup>

7.5.78 Ofcom research reported that disappearing messages are a feature that emboldens people to bully others as they limit the ability to collect evidence of bullying. Messages that disappear after 24 hours, or even immediately after viewing, also make it more difficult for those in authority to intervene, to hold perpetrators of bullying to account, and to resolve issues.<sup>729</sup>

### *Commenting on content*

7.5.79 Bullying content can also be shared within comments. Ofcom’s research on online experiences found that some kinds of bullying content were most commonly experienced in this way. For example, 54% of respondents<sup>730</sup> who had experienced trolling<sup>731</sup> said it appeared in comments or replies to posts, while 41% had experienced one-off abusive behaviour or threats in this way.<sup>732</sup>

7.5.80 Almost two-fifths of 8-17s (38%) said they had received negative comments on a photo they had posted; this was more likely among 13-17-year-olds (45%) than 8-12s (32%). This study, by the UK Safer Internet Centre in 2017, noted that this can affect children’s ability to express themselves; 40% overall said they didn’t post images because of worries about ‘mean’ comments. Girls were more likely than boys to agree with this (44% vs 37%).<sup>733</sup>

7.5.81 A study in Ireland among 8-16-year-olds found that older children were more likely to experience ‘nasty comments posted about me’: 12% of 12-16-year-olds reported this, compared to 7% of 8-12s. Significant differences by gender occurred here: 37% of non-binary children aged 12-16 experienced this behaviour, followed by 13% of girls, and 9% of boys.<sup>734</sup>

7.5.82 The ability to comment on content can combine with the anonymity of user profiles to exacerbate the conditions for online bullying. As mentioned in sub-section ‘Anonymous

---

<sup>725</sup> Office for National Statistics, 2020. [Online bullying in England and Wales: year ending March 2020](#).

<sup>726</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#).

<sup>727</sup> Family Kids & Youth, The Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry, 2016. [Cyberbullying: Research into the attitudes of 11-16 year olds, Quantitative Findings](#).

<sup>728</sup> User-to-user service functionality that allows users to send messages that are automatically deleted after they are viewed by the recipient, or after a prescribed period of time has elapsed.

<sup>729</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>730</sup> This data is based on adults and children aged 13-17, as the sample size for children experiencing these was too low to report.

<sup>731</sup> Trolling is defined in this research as ‘a person who says something to cause intentional upset or provoke a negative reaction’.

<sup>732</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>733</sup> UK Safer Internet Centre, 2017. [Power of Image: A report into the influence of images and videos in young people’s digital lives](#).

<sup>734</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#).

user profiles' within this section, the NSPCC reported that posting comments anonymously is often central to bullying behaviour.<sup>735</sup>

#### *Posting content*

- 7.5.83 Participants in Ofcom research said that the ability to post content made online bullying easier. They felt that those targeted by online bullying could be targeted in more varied ways than in person, including the creation and sharing of material. The various ways in which to bully someone online, for example, by creating and sharing humiliating content, meant that online bullying tended to be more aggressive than in-person bullying.<sup>736</sup>
- 7.5.84 In 2017, more than a fifth (22%) of 8-17s said that they had experienced bullying via images and videos online. This was more likely to happen 'occasionally' (11%) than on a frequent basis: 5% said 'someone had posted an image or video to bully me' often, while another 5% said this happened 'all or most of the time'.<sup>737</sup>
- 7.5.85 GenAI models can be used to create bullying content that can be posted on U2U services, or shared with other users by other means such as messages or comments. For instance, AI-based voice synthesisation software may be used to create audio that mimics an individual's voice and share intimate information or create inflammatory content. This can then be posted online. GenAI bots can also be uploaded by malicious actors to troll specific and targeted individuals.<sup>738</sup>

#### *Re-posting and forwarding content*

- 7.5.86 Bullying content can be reshared or forwarded, often without the targeted individual knowing, or giving their consent. A source from 2016 noted that 12% of 11-16-year-olds had experienced someone sharing pictures or videos of them without their permission. This was more likely to happen among the older age groups: 17% of both year 10s (age 14/15) and year 11s (age 15/16), compared to 8-9% of the younger children (age 11-14).<sup>739</sup> This finding was reflected in research among 8-16-year-olds in Ireland: 14% of 12-16s reported having 'my photo/video posted without permission', compared to 6% of 8-12-year-olds.<sup>740</sup>
- 7.5.87 Re-sharing or forwarding content, including degrading or humiliating content, can amplify the reach of bullying content and the harm it causes. A participant in another Ofcom study described local groups online which were known for sharing and re-posting 'local drama', including 'call out' and 'raid'<sup>741</sup> videos. The participant said "A video that I watched...this girl, she got raided by a few other girls...The girl was in the toilet, and they grabbed the girl by the hair and stuffed her face in her [faeces] and videoed it. It got sent

---

<sup>735</sup> NSPCC, 2017. [Net Aware Report 2017: "Freedom to express myself safely"](#).

<sup>736</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>737</sup> Data shows that 22% of 8-17s had experienced someone post an image or video to bully them. Source: UK Safer Internet Centre, 2017. [Power of Image: A report into the influence of images and videos in young people's digital lives](#).

<sup>738</sup> Cyberbullying Research Center, 2023. [Generative AI as a Vector for Harassment and Harm](#) [accessed 28 March 2024].

<sup>739</sup> Family Kids & Youth, The Royal Foundation of The Duke and Duchess of Cambridge and Prince Harry, 2016. [Cyberbullying: Research into the attitudes of 11-16 year olds, Quantitative Findings](#).

<sup>740</sup> Cybersafe Kids, 2022/23. [Keeping Kids Safer Online, Trends and Usage Report Academic Year 2022-2023](#).

<sup>741</sup> This research defines 'call-out' videos as those where people provoke or retaliate (often involving violent threats); and 'raid' videos as those where people film a break-in to the homes of their rivals as a form of humiliation.

over everywhere.” The participant noted that the content she saw gained a lot of attention online in the form of views, likes and reshares.<sup>742</sup>

#### *Posting or sending location information*

7.5.88 A user’s geographic location can be shared in their profile, and this can create a risk of online bullying transitioning to offline. In Ofcom research with 12-17-year-olds, practitioners, and school staff, the participants felt that identifying someone’s physical location could encourage escalation to in-person bullying among children, or threats to do so.<sup>743</sup>

### Content storage and capture

#### *Screen capturing or recording*

7.5.89 The ability to capture images and videos is a feature which may enable bullying content to be shared further. Participants in Ofcom research among 12-17-year-olds reported that being able to ‘take and share screenshots or recordings, and autosave content to phone galleries’ meant that people were able share content from, or about, someone else to other sites without the individual being targeted knowing about it. A participant noted that someone could think something was funny, and share it, which is then seen by others and shared further, and “it’s like a continuous chain of people [sharing it] to make fun”.<sup>744</sup>

7.5.90 The same study found that these features deterred some people from reporting bullying. Functionalities such as notifications when another user takes a screenshot of their content (a default feature on one service), were identified as a potential mitigation measure for online bullying. Some participants suggested that this would discourage people from taking and sharing content, as well as making it difficult to do it without the target knowing.<sup>745</sup>

### Content editing

#### *Editing visual media*

7.5.91 The ability to edit images and videos can play a role in bullying content that is shared online. A recent inquest found that a group of boys had created fake nude photos of girls in their school, sharing them via group chats.<sup>746</sup> This kind of behaviour constitutes an illegal offence (see Section 6.C in the [Illegal Harms Register](#) in our [Illegal Harms Consultation](#)), but is mentioned here as the impact of sharing such images can often be compounded with bullying received by peers.

7.5.92 Participants in Ofcom research discussed how existing content could be edited negatively, to influence how children were seen. A child participant spoke about how content he had posted was screen-grabbed and reposted by others in an attempt to create a ‘meme’.<sup>747</sup>  
<sup>748</sup> A participant in other Ofcom research said how other users shared a picture of him

---

<sup>742</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>743</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>744</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>745</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

<sup>746</sup> Lynn, G., 2024. [Mia Janin took own life after bullying – inquest.](#) BBC, 26 January.

<sup>747</sup> A ‘meme’ is an idea, image, video, etc, that spreads very quickly on the internet. [Cambridge Dictionary](#). [accessed 18 January 2024]; A ‘meme’ is an amusing or interesting item (such as a captioned picture or video) or genre of items that is spread widely online especially through social media [Merriam-Webster Dictionary](#). [accessed 18 January 2024].

<sup>748</sup> Ofcom, 2023. [Key attributes and experiences of cyberbullying among children in the UK.](#)

with an embarrassing filter, acquired by their ‘hacking’ into his account on an online gaming platform.<sup>749</sup>

## Recommender systems

- 7.5.93 Detailed explanation on how content recommender systems<sup>750</sup> work and how they can pose a risk to children is set out in our Wider context for understanding risk factors section (Section 7.14) within this volume.
- 7.5.94 Bullying content is often shared directly with the children being targeted. Recommender systems are therefore less relevant to risk of harm than other kinds of harmful content. However, dissemination by recommender systems can amplify bullying content, creating a wider audience for the bullying, which can intensify the harm on the targeted individual (see sub-section on ‘Impacts’ within this section).
- 7.5.95 Ofcom’s research on online experiences<sup>751</sup> found that certain kinds of bullying content were most likely to be seen when users<sup>752</sup> were scrolling through their feeds. For example, more than a third of participants reported encountering trolling<sup>753</sup> and one-off abusive threats or behaviour when scrolling (35% and 34% respectively). This was the second most common way in which these kinds of content were encountered (after encountering them via comments or replies to posts, articles or videos). While this study explores the experiences of adults and children, scrolling and the associated role of recommender systems is likely to remain important when considering children in isolation.

---

<sup>749</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>750</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside of the user’s normal engagement pattern.

<sup>751</sup> Ofcom, 2023. [Online Experiences Tracker.](#)

<sup>752</sup> The sample size of children who experienced each harm was too low to report on, hence data is shown as overall figure for adults and children (aged 13-17).

<sup>753</sup> Trolling is defined in this research as ‘a person who says something to cause intentional upset or provoke a negative reaction’.

## 7.6 Violent content

**Warning: this section contains references to content that may be upsetting or distressing, including references to sexual violence.**

### Summary: risk of harm from violent content

In this section, we consider content that encourages, promotes or provides instructions for an act of serious violence against a person; depicts real or realistic serious violence/injury against a person in graphic detail; or depicts real or realistic serious violence/injury against an animal or fictional creature in graphic detail.

The physical and psychological harms that can arise from this kind of content can include the normalisation and adoption of violent behaviours, alongside anxiety, avoidant behaviours and other emotional distress.

#### *User base risk factors:*

User demographics can play a significant role in the risk of harm that can occur from violent content. Age affects the risk of harm; evidence suggests that children in their mid-teens (aged 13-15) may be most likely to engage with violent content, while older children (aged 16-17) may be at greater risk of encountering more extreme violent content but be desensitised to it. Gender is also important: evidence suggests that both boys and girls are encountering violent content, but the type of violent content varies according to the child's gender.

Evidence suggests that an individual's race and ethnicity and socio-economic status can have an effect on their risk of harm from violent content.

Children with a mental health condition or special educational needs may be more at risk of harm from violent content than those without, due to their greater consumption of such content, and how they engage with it.

#### *Service type risk factors:*

Violent content tends to be in video format and shared publicly online on video-sharing and social media services. These services enable the content to be disseminated to large audiences.

The content is also present in more closed spaces. Messaging services are used to share violent content as there is a perception that they offer more protection against enforcement or moderation than other services.

Violent content can be found on gaming services due to such content being shared via chats while gaming. The evidence also suggests that clips of violent game-play circulate online.

Due to their role in enabling encounters with violent content, these four service types have been included in the draft Children's Risk Profiles.<sup>754</sup>

---

<sup>754</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.



### *Functionalities and recommender systems: risk factors*

Content recommender systems<sup>755</sup> may increase the risk of children encountering violent content, often without them actively seeking it out. Evidence suggests that recommender systems are one of the main ways in which children encounter violent content without seeking it out, largely from users they don't already have a connection with. Content recommender systems are therefore included in the draft Children's Risk Profiles.

There is a culture of sharing violent content among children, and many functionalities can provide the online infrastructure to support this culture.

Violent content, often fighting content, can be posted online as images and videos. Functionalities that enable children to establish a large number of user connections can lead to vast online networks through which violent content can be rapidly distributed. This risks a greater number of children encountering violent content, and could encourage further sharing of violent content, as children can be incentivised by the perceived popularity of the content. In the context of peer fighting and serious youth violence, humiliation – due to the size of the online audience – can risk provoking retaliation. The use of large group messages is commonplace, and further enables the spread of violent content. Violent content can also be shared from anonymous user profiles, which can increase the ease with which violent content can be shared. These four functionalities have been included in the draft Children's Risk Profiles.

Other functionalities are also relevant to consider in the context of violent content. Evidence suggests that some of posts containing violent content are ephemeral,<sup>756</sup> and some violent content is livestreamed, so should only exist for a limited time. However, evidence also suggests that downloading and screen-capturing violent content is second nature to children, extending the lifespan of the content as it can be reposted and forwarded with ease.

User profiles dedicated to sharing violent content, mainly local violence, are present online. Such user profiles can become integrated in the online networks of children and facilitate the spread of violent content.

Violent content can also be shared via direct messages between users. Some content is shared via encrypted messaging services specifically due to the perceived protection offered against reporting. Hyperlinks are often used within messages, facilitating the spread of violent content across platforms. User tagging is also used by children to direct friends towards violent content.

---

<sup>755</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside of the user's normal engagement pattern.

<sup>756</sup> User-to-user service functionality that allows users to send messages that are automatically deleted after they are viewed by the recipient, or after a prescribed period of time has elapsed.

## Introduction

---

- 7.6.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by the following priority content that is harmful to children on U2U services ('risk of harm'):
- a) Content which encourages, promotes or provides instructions for an act of serious violence against a person.
  - b) Content which:
    - i) depicts real or realistic serious violence against a person;
    - ii) depicts the real or realistic serious injury of a person in graphic detail.
  - c) Content which:
    - iii) depicts real or realistic serious violence against an animal;
    - iv) depicts the real or realistic serious injury of an animal in graphic detail;
    - v) realistically depicts serious violence against a fictional creature, or the serious injury of a fictional creature in graphic detail.
- 7.6.2 This section will use the term 'violent content' to refer to the kinds of content listed above.
- 7.6.3 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section 7). 'Harm' means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.6.4 In our draft Guidance on Content Harmful to Children (Section 8.8), later in this volume, we provide guidance on identifying violent content, including examples of what Ofcom considers to be, or considers not to be, violent content. To summarise, this is a broad category which can take many forms. It includes content depicting graphic physical fights between groups and individuals, content depicting serious injuries (often including blood and gore), serious threats of violence, content promoting or glamourizing weapons, content condoning gendered and sexual violence and animal cruelty content. See 'Guidance on violent content' (Section 8.8) for more detail and contextual considerations when identifying violent content.
- 7.6.5 Some kinds of violent content overlaps with other kinds of harmful content in the Online Safety Act 2023 ('the Act'). For example, content encouraging violence against women and girls or another listed characteristic (e.g. race, religion or sexual orientation) may overlap with abuse and hate content. Refer to Abuse and hate content (Section 7.4) for more detail.
- 7.6.6 Some of this content may be illegal. For example, some content encouraging violence may contain a direct threat of violence or to kill. Content depicting sexual violence may constitute an Extreme Pornography offence. Any content depicting children aged under 18 engaged in, or appeared to be engaged in, sexual acts is Child Sexual Abuse Material. Content depicting cruelty to animals may be illegal under the Animal Welfare Act.<sup>757</sup> Since the evidence does not often distinguish between legal and illegal content, this section may include reference to some illegal content in seeking to assess risk of harm to children

---

<sup>757</sup> Online content that encourages or assists someone to commit animal cruelty, or conspires to commit this behaviour, may be illegal. Our consultation on animal cruelty offences will follow this consultation.

from violent content from the available evidence. However, illegal content is explored primarily in our [Illegal Harms Register](#) within our [Illegal Harms Consultation](#) (see ‘CSEA’, ‘Extreme Pornography’ and ‘Harassment, Stalking, Threats and Abuse’ sections).

- 7.6.7 Due to these overlaps and limitations in the available evidence base, some of the evidence described in this section relates to content which is broader than the definition of violent content in the Act. Where such evidence has been included, it is because we think it is nevertheless relevant to understanding the risk of harm from violent content.
- 7.6.8 To build our evidence base on these harms, Ofcom commissioned research on children’s experiences of encountering violent content online (see footnote for sample details).<sup>758</sup> The findings from this research are noted throughout, where relevant, but we have also considered the wider landscape of the evidence available.

## How violent content manifests online

---

- 7.6.9 This sub-section looks at how violent content manifests online and how children may be at risk of harm.
- 7.6.10 Children interact with violent content online in a number of ways. These include encountering it on their feeds, being sent it by peers or sharing violent content themselves.
- 7.6.11 Interacting with violent content online is closely related to social status.<sup>759</sup> Violence among children is not new, but the potential consequences (including loss or gain in status) are amplified by incidents involving violence being recorded and shared online. Online conflicts can escalate more quickly because of the ease with which content and messages can be shared online.<sup>760</sup> Ofcom research also reported that many children, and particularly those seeking social validation or looking to build their online following, said they shared violent content to gain popularity, due to the high levels of engagement that violent content would typically gain.<sup>761</sup> Others reported that some of their friends shared violent content as they thought it was “funny” to surprise them with it.<sup>762</sup>
- 7.6.12 Moreover, online environments allow people to post content and interact with other users in a way that projects a particular identity: evidence suggests that social media services can be used to cultivate a perception of being violent, and a “tough” reputation. A Revealing Reality study found that vulnerable children aged 14-17 in disadvantaged communities had experienced threats of violence online, which were “theatrical, dramatic

---

<sup>758</sup> This study incorporated three stages: Two online focus groups with professionals currently working with children and young people across the UK (included those working in education, such as teachers, headteachers, PSHE and SENCO teachers, and other professionals such as social workers, child protection leaders, gang/exploitation workers and youth workers); 15 workshops with children (aged 8-17); and 15 in-depth interviews with children (aged 12-16) who were identified as having had direct experience of violent content. Source: Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#). Subsequent references to this report throughout.

<sup>759</sup> Revealing Reality, 2023. [Anti-social Media](#). [accessed 17 April 2024]. Subsequent references to the report throughout.

<sup>760</sup> Crest Advisory (Caluori, J., Hutt, O., Olajide, P. and Kirk, E.), 2022. [Fixing Neverland](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>761</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>762</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

displays of violence” optimised for how they looked on camera.<sup>763</sup> While some threats may be motivated by image-building and are not intended to be carried out in reality, there are many examples of threats or humiliations made online relating to incidents of serious harm or death to children and young adults. Refer to sub-section ‘Impacts’ within this section for more information.

## Presence

- 7.6.13 Violent content is widely encountered by children. Evidence suggests that between 25% and 60% of children have seen violent content online, and many are seeing it regularly.<sup>764</sup> Ofcom research found that 11% of children aged 13-17 recalled encountering violent content at least once in a four-week period.<sup>765</sup> Other Ofcom research reported that children aged 8-17 described encountering violent content online as “unavoidable”.<sup>766</sup>
- 7.6.14 Certain types of content are particularly present in the online lives of children. The evidence suggests that fighting is one of the most common types of violent content experienced by children. Ofcom’s research found that local school and street fighting was a commonly-named type of violent content encountered by children aged 8-17, with fights being set up, filmed and posted online.<sup>767</sup> The Youth Endowment Fund also reported fighting as one of the types of violent content most commonly seen by children aged 13-17 (44%).<sup>768</sup>
- 7.6.15 Another common type of content for some children is content relating to serious youth violence or violent crimes. Ofcom research found that this was more commonly mentioned by children who live in a city, who described the content as featuring local violence, weapons, and specific crimes including murders and stabbings.<sup>769</sup> Other evidence indicates that U2U services can be used to threaten and provoke others in ways likely to trigger an act of violence, with the scale of an online audience amplifying humiliation and making retaliation more likely.<sup>770</sup> Refer to our [Illegal Harms Register](#) (see ‘Harassment, Stalking, Threats and Abuse’ section) for more information.

---

<sup>763</sup> Evidence uses varying definitions of vulnerable children. Vulnerable in this sample relates to children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social Media](#).

<sup>764</sup> Internet Matters reports that 24% of children aged 9-15 had ever seen violent content, which was the third most commonly experienced online harm out of all listed. Source: Internet Matters, 2023. [Children’s Wellbeing in a Digital World: Year Two Index Report 2023](#). [accessed 17 April 2024]. Subsequent references to this report throughout. A study by the Youth Endowment Fund found children’s experience of violent content online was more common, with three in five children aged 13-17 (60%) having seen any violent content on social media in the past 12 months. Source: Youth Endowment Fund, 2022. [Children, Violence and Vulnerability](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>765</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>766</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>767</sup> The research describes local school and street fights as those tending to be among children aged 11 and older, both in and outside of school. It was common for children and young people involved in the fights to know each other, but they could also be among strangers. Source: Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>768</sup> Youth Endowment Fund, 2022. [Children, Violence and Vulnerability](#).

<sup>769</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>770</sup> Catch 22 (Irwin-Rogers, K. and Pinkney, C.), 2017. [Social Media as a Catalyst and Trigger for Youth Violence](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

- 7.6.16 Children may also encounter graphic depictions of violence in other contexts, such as gaming. Ofcom research found that many of the children spoken to cited gaming as a source of violent content, due to violent comments from other users being shared in gaming chats, and edited clips of violent games circulating online.<sup>771</sup>
- 7.6.17 Evidence also suggests that children may be encountering content depicting graphic violence in conflict zones. A recent study created profiles with an age of 13 across various online services. These attracted more than 300 posts or videos portraying extremely graphic and distressing (including violent) imagery from the Gaza conflict.<sup>772</sup> Please refer to the draft Guidance on Content that is Harmful to children (Section 8.1) and Guidance on violent content (Section 8.8) for the circumstances in which this kind of content may, or may not, meet the definition of content that is harmful to children and the relevance of news publisher and journalistic content.
- 7.6.18 Children may also encounter content which promotes violence, even where violence is not depicted in the content itself. This can include content which justifies, normalises or encourages violence against women and girls.<sup>773</sup> This content can overlap with other forms of violent content, or with hate or abuse content. Refer to the Abuse and hate content section (Section 7.4) within this volume for more information.
- 7.6.19 Violent content against animals is accessible to children online, and the volume of such content appears to be increasing. Ofcom’s research found that 10% of children aged 13-17 recalled encountering “content depicting animal cruelty” over a four-week period.<sup>774</sup> The RSPCA reported that there were 756 reports of animal abuse on social media in 2021, up from 157 in 2019.<sup>775</sup> While not specific to children, this evidence indicates an increase in the volume of violent animal content online, and therefore the risk of children encountering it.
- 7.6.20 Many forms of animal violence exist online but there is evidence to suggest that specific types of widely shared content are more commonly experienced by children. The RSPCA is aware of multiple types of violent content against animals,<sup>776</sup> but Ofcom’s research among children aged 8-17 found that discussion tended to focus on a recent example of extreme animal cruelty content, involving a household appliance and an animal.<sup>777</sup>

## Impacts

- 7.6.21 Research has shown that children, particularly older children aged 16-17, believe they are becoming desensitised to violent content.<sup>778</sup> Children may therefore not be forthcoming

---

<sup>771</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>772</sup> This research involved creating profiles on Instagram, TikTok, and Snapchat with an age of 13, in the UK jurisdiction. Content related to the conflict was surfaced using prominent relevant hashtags, as well as content geotagged in Gaza. Source: Institute for Strategic Dialogue (ISD), 2023. [Violent and graphic content of the Gaza conflict served to minors’ accounts](#). [accessed 17 April 2024].

<sup>773</sup> Internet Matters, 2023. [“It’s really easy to go down that path”: Young people’s experiences of online misogyny and image-based abuse](#). [accessed 17 April 2024].

<sup>774</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>775</sup> Morris, A., 2022. [RSPCA reports of online animal abuse more than doubled in the last year](#). Chronicle Live, 7 September. [accessed 17 April 2024].

<sup>776</sup> Examples of violent content included organised animal fighting, animal hunting, animals being kept in poor conditions and content of a sexual nature. Source: Meeting between Ofcom and the RSPCA, October 2023.

<sup>777</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>778</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

about the impact on them of consuming violent content. Indeed, research commissioned by the Department for Digital, Culture, Media and Sport (DCMS) among children and young adults aged 9-18 found that children were likely to report fewer negative impacts than their parents and carers.<sup>779</sup> However, evidence suggests that exposure to violent content online can be related to a number of psychological and behavioural outcomes.

- 7.6.22 Internet Matters research reported that children are affected by the violent content they encounter: 67% of children aged 9-15 who had seen violent content online rated it at 4 or above on a scale of 1 ('I wasn't bothered') to 7 ('I found it very scary'), with 14% rating it at 7.<sup>780</sup>
- 7.6.23 Encountering violent content can create feelings of anxiety for children, particularly when the content is from their local area.<sup>781</sup> This can manifest in a number of ways, including sleep disruption, behavioural changes and social withdrawal.<sup>782</sup> Ofcom research reported that teachers of children from disadvantaged communities had observed children becoming socially and physically withdrawn, staying at home to feel safe, and missing out on education. Teachers said they thought this was because consistent exposure to violent content had contributed to children thinking they were likely to encounter violence similar to that which they frequently encountered online.<sup>783</sup> Catch 22's response to our 2023 Protection of Children Call for Evidence also described how "some of the young people we work with become traumatised by the violent content [they encounter] and do not want to leave the house".<sup>784</sup>
- 7.6.24 Violent content is associated with other psychological impacts for children, including feeling anxious, guilty and isolated. Ofcom research found that children can feel peer pressure to find violent content funny, and failure to do so can lead to a feeling of isolation from their peer group. Children reported viewing violent content alone before bed, which made some feel anxious, and others described feeling guilty about not reporting what they had seen.<sup>785</sup>
- 7.6.25 Encountering violent content online, especially in high volumes, risks normalising violence. This was reported by professionals and children in the Ofcom research<sup>786</sup> and by a study by Revealing Reality among vulnerable children aged 13-17.<sup>787</sup> Encountering content promoting violence against women and girls has been linked to a difference in attitudes towards violence among children. A study by domestic abuse organisation

---

<sup>779</sup> This source defines violent content as 'Content showing violence that may not be appropriate for children depending on their age. Content may include fights and injury, the use of weapons to cause harm, the infliction of pain, domestic violence, gang violence or sexual aggression.' Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 17 April 2024]. Subsequent references to this report throughout. Note: DCMS stands for the UK Government department, 'Department for Digital, Culture, Media & Sport'. This has now been replaced by 'Department for Science, Innovation and Technology' (DSIT) and 'Department for Culture, Media and Sport' (DCMS).

<sup>780</sup> Internet Matters, 2023. [Children's Wellbeing in a Digital World: Year Two Index Report 2023](#).

<sup>781</sup> Social Finance, 2022. [Social media, psychological harm and violence among young people](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>782</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>783</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>784</sup> [Catch 22 response](#) to 2023 Protection of Children Call for Evidence.

<sup>785</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>786</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>787</sup> Revealing Reality, 2023. [Anti-social Media](#).



Women’s Aid found that children and young adults aged 7-18 who had seen content from Andrew Tate (an online personality whose content presents views that are generally considered to be misogynistic, including talking about committing acts of violence against women and girls), were nearly three times as likely to believe that “hurting someone physically is okay if you say sorry after hurting them” (compared with just 4% of those who had not seen such content).<sup>788</sup> While this content does not link these outcomes specifically to violent content shared by the influencer, the messages within his content may have contributed to the significant difference in attitudes towards violence between those who have, and have not, seen his content.

- 7.6.26 Normalisation of violent content online also risks increasing the amount of violent content in circulation online. A study in West Yorkshire among children and young adults aged 11-25 concluded that the normalisation of violent content among children can increase the risk of them sharing such content further.<sup>789</sup>
- 7.6.27 Encountering violent content can encourage specific behaviours relating to violence, such as carrying weapons. Children may be encouraged to carry weapons by seeing content showing others doing this: a study by the Youth Endowment Fund found that nearly a quarter (24%) of children aged 13-17 had seen other children carrying or promoting weapons on social media in the past year.<sup>790</sup> Ofcom research also reported that professionals had seen some of the vulnerable children they worked with adopting violent behaviours, such as carrying knives for protection, after seeing violent content such as weapons being used or flaunted online.<sup>791</sup> These behaviours can be normalised through online communities in which violent content is widely shared. Revealing Reality showed how encountering high volumes of harmful content can warp children’s perception of reality, with one child from a vulnerable community believing that all children carry knives.<sup>792</sup>
- 7.6.28 While the relationship between encountering violent content and acts of violence is complex, there is evidence to suggest that violent content can directly contribute to, or trigger, acts of violence. In a survey by Crest Advisory with 13-17-year-olds, 52% said they believed social media was either a major, or the most important, factor influencing why some young people commit acts of violence.<sup>793</sup> The murder of Olly Stephens is an example of how violent content can be linked to acts of serious violence. While the use of social media to organise this crime would probably be illegal, the lead detective described his shock at the volume of violent content found on the phones of the 13- and 14-year-olds convicted of the murder, which included videos of knives being flicked and shown off. He believed that those involved were regularly exposed to violent content and had

---

<sup>788</sup> Women’s Aid (Dean, K. and Davidge, S.), 2023. [Influencers and Attitudes: How will the next generation understand domestic abuse?](#) [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>789</sup> Social Finance, 2022. [Social media, psychological harm and violence among young people.](#)

<sup>790</sup> Youth Endowment Fund, 2022. [Children, Violence and Vulnerability.](#)

<sup>791</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>792</sup> The evidence showed that seeing a lot of this kind of content can affect young people’s perceptions or assessments: “One young person was asked by a police liaison officer, “Out of 100 kids, how many on average do you think carry a knife?” The young person responded, “100 out of 100”. In reality, the police liaison officer told us, “It’s one out of 100. It has become the norm for him, I think he’s got the idea from social media”. Source: Revealing Reality, 2023. [Anti-social Media.](#)

<sup>793</sup> Crest Advisory, 2022. [Fixing Neverland.](#)



become desensitised to it, speaking of the “casual and cold tone” in which they discussed the attack online.<sup>794</sup>

- 7.6.29 Evidence suggests that the risk of retributive violence is related to the larger audience of violent content online (compared to offline), which can create pressure for children to defend their social status. A Crest Advisory report explained that practitioners and parents believe the presence of an online audience increases the pressure on young people to act, rather than risk compromising their reputation.<sup>795</sup>

## Evidence of risk factors on user-to-user services

---

- 7.6.30 We consider that the risk factors below may increase the risk of harm to children from violent content. This is summarised in the grey box at the start of the section.

### Risk factors: user base

#### User base size

- 7.6.31 Violent content can appear on services such as social media and video-sharing services with large user bases. This large pool of users, including children, are at risk of encountering harmful content. In addition to this, because violent content can receive substantial amounts of engagement, and is then amplified through recommender systems, it is more likely to occur on platforms with larger user bases. Refer to sub-sections ‘User Communication: Commenting on Content, Posting Content and Reposting Content’ and ‘Recommender Systems’ within this section for more information.

#### User demographics

- 7.6.32 The following sub-section outlines key evidence of user base demographic factors and risks of harm to children, which can include listed characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.
- 7.6.33 The evidence suggests that user base characteristics including **age, gender, race and ethnicity, disability** and **socio-economic factors** of users could lead to an increased risk of harm to children.

#### Age

- 7.6.34 Age affects the risk of harm from violent content: Ofcom research found that encountering violent content began in primary school and the nature of the content encountered became increasingly violent among older children.<sup>796</sup> However, the research found that the risks of harm from violent content, and the effect of exposure to it, differed by age group, as described below.

---

<sup>794</sup> 13-year-old Olly Stephens was stabbed to death by two teenage boys in a field behind his house, after they recruited a girl online to lure him there. The attack was planned on social media and triggered by a dispute in a social media chat group. Source: Spring, M., 2022. [A social media murder: Olly’s story](#). BBC, 30 June. [accessed 17 April 2024].

<sup>795</sup> Crest Advisory, 2022. [Fixing Neverland](#).

<sup>796</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

- 7.6.35 The evidence suggests that children in their mid-teens (ages 13-15) may be more likely to engage with violent content than children of other ages.<sup>797</sup> Children in the Ofcom research said that this was due to the perceived popularity of the content, and the desire to belong, and to fit in with what others their age are doing online. This behaviour is linked to children’s developmental stages; peer relations and social pressures at this age contribute to children’s engagement with violent content.<sup>798</sup> Despite the increased likelihood of their engaging with violent content, children of this age still described the content as “shocking” and “upsetting”.<sup>799</sup> Children’s engagement with violent content may risk recommender systems promoting more related content, or content of the same kind, (refer to sub-section ‘Recommender systems’ within this section for more information), so children of this age may be at disproportionate risk of encountering high volumes of violent content which they find upsetting.
- 7.6.36 The evidence suggests that children in their late teens (16-17) may be encountering extreme violent content, and are at greater risk of being desensitised to it.<sup>800</sup> Ofcom research found that children of this age tended to speak about violent content in a dispassionate, or sometimes jovial, manner.<sup>801</sup> The research also reported that children of this age said they were less likely to engage with violent content than children aged 13-15, as this behaviour was something they tended to do more when they were younger.

#### *Gender*

- 7.6.37 Although there is evidence to suggest that both girls and boys aged 13-17 claim to have similar overall experiences of encountering violent online content, other evidence suggests that the type of violent online content experienced may vary by gender.<sup>802</sup> Ofcom research into violent content found that fighting content was more common among boys,<sup>803</sup> and a study in West Yorkshire reported that only about 3% of girls had seen “murder” content, compared to nearly 30% of boys.<sup>804</sup>
- 7.6.38 The evidence suggests that boys may be more likely to encounter misogynistic content promoting violence against women and girls. A study found that 29% of boys aged 7-11 had seen content from a Andrew Tate, who discusses committing acts of violence against women and girls, compared to just 13% of girls.<sup>805</sup> The impact on boys of encountering this kind of content may be heightened by also encountering content that promotes potentially psychologically harmful ideals of masculinity. Refer to the Abuse and hate content section (Section 7.4) within this volume for more information.

---

<sup>797</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>798</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>799</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>800</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>801</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>802</sup> Ofcom’s Online Experiences Tracker reports only a small difference between girls and boys aged 13-17 who have seen content depicting or encouraging violence or injury in the past four weeks (9.5% of girls and 11.5% of boys). Source: Ofcom, 2023. [Online Experiences Tracker](#); Similarly, a study among children aged 13-17 found similar overall consumption of violent content between girls and boys. Source: Youth Endowment Fund, 2022. [Children, Violence and Vulnerability.](#)

<sup>803</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>804</sup> Figures are estimates read from the chart on page 26. Source: Social Finance, 2022. [Social media, psychological harm and violence among young people.](#)

<sup>805</sup> Women’s Aid, 2023. [Influencers and Attitudes.](#)

7.6.39 The evidence suggests that boys, particularly those aged 13-15, may be more likely to both seek out violent content, and to share it once they have encountered it. Ofcom research found that boys aged 13-15 were most likely to search for violent content which they had heard about, and share it, due to their desire to “fit in” as well as the perceived popularity of the content.<sup>806</sup>

#### *Race and ethnicity*

7.6.40 Race may be a risk factor for encountering online violent content. The evidence indicates that Black children are disproportionately affected by violence offline: the Youth Endowment Fund found that 33% of Black children aged 13-17 had been victims of violence in the past 12 months, compared to 13% of white children and 11% of Asian children.<sup>807</sup> The report found that children who had either witnessed or been a victim of violence were more likely to have seen an act of violence on social media, therefore it is reasonable to assume that Black children may be more likely to encounter violent content compared to white or Asian children.

#### *Disability*

7.6.41 Children with some types of disability may be more at risk of harm from violent content than those without any disability because they may encounter more of it. A study by Internet Matters found that 16% of 11-17-year-olds with speech difficulties, and 14% of autistic 11-17-year-olds had “often” seen violent content, compared to 5% of children the same age without any vulnerabilities.<sup>808</sup>

7.6.42 Children who are neurodivergent or have special educational needs may also be more at risk of harm from violent content than children without, due to the way in which they engage with the content. Ofcom research found that specialists who work with children who are neurodivergent think they may be more at risk of violent content because they can become more “obsessive” about the content.<sup>809</sup> Similarly, in a small-scale study by the UK Council for Child Internet Safety, teachers of children with special educational needs reported that these children were more likely than their peers to regard games as “real”, and struggled to see them as fantasy.<sup>810</sup> This suggests that the risk of psychological or behavioural impacts from violent gaming content may be higher for children with special educational needs.

#### *Physical/mental health*

7.6.43 Children with a mental health condition may be more at risk of harm from violent content than those without because they may encounter more of it. Ofcom research found that children with a mental health condition were more likely than children without to recall encountering violent content online (18% vs 10%).<sup>811</sup>

---

<sup>806</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>807</sup> Youth Endowment Fund, 2022. [Children, Violence and Vulnerability](#).

<sup>808</sup> Note: Figures cited have been taken from the charts of the report. Vulnerable groups specified in the research are: anger issues; autism; “I worry about life at home”; learning difficulties; speech difficulties; hearing difficulties; vision difficulties; mental health difficulties; care experienced; eating disorder; physical illness; carer; “English is not my first language”. Source: Internet Matters (Katz, A. and El Asam, A.), 2021. [Refuge and Risk: Life Online for Vulnerable Young People](#). [accessed 5 October].

<sup>809</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>810</sup> UKCCIS, 2011. [Children with special educational needs – internet safety concerns](#).

<sup>811</sup> Ofcom, 2024. [Online Experiences Tracker](#).

### *Socio-economic factors*

- 7.6.44 Evidence suggests that children with a lower socio-economic background are more likely to be involved in violence offline. The Youth Endowment Fund found that children aged 13-17 who were either supported by a social worker (60%), regularly missed classes (55%), received free school meals (46%), or were not from a two-parent household (42%), were more likely to have been a victim of, or a witness to, violence, compared to children who weren't from any of these backgrounds (31%).<sup>812</sup> The research also found that children who had either witnessed or been a victim of violence were more likely to have seen real-life violence on social media. Therefore, it is likely that socio-economic factors may increase a child's risk of encountering violent content online. Indeed, a study by Revealing Reality with vulnerable children aged 13-17 from deprived backgrounds found that violent content is often created and shared in a hyperlocal context, making it particularly prevalent in specific urban, disadvantaged areas.<sup>813</sup>
- 7.6.45 There is also specific evidence to suggest that children with a lower socio-economic background are more at risk of harm from violent content online. Ofcom research reported that professionals working with children think that children with a lack of parental oversight, or those who may be experiencing instability at home, may be at greater risk of harm from violent content. These participants explained that an online world can feel "supportive" for these children and can result in them becoming more immersed in violent content.<sup>814</sup> Children who have witnessed violence at home may also be more at risk of harm from violent content due to the greater risk of re-traumatisation.<sup>815</sup>

### **Risk factors: service types**

- 7.6.46 Research suggests that children are at an increased risk of encountering violent content on the following service types: social media services and video-sharing services, messaging services, gaming services, discussion forums and chat room services.
- 7.6.47 A U2U service may simultaneously include more than one service type, and some might also be a feature of a wider service.

### **Service types**

#### *Social media services and video-sharing services*

- 7.6.48 Evidence indicates that children are encountering and engaging with violent content on social media services and video-sharing services.<sup>816</sup> Videos and images are shared on such services, and this is often the format in which violent content is encountered. These types of services can also allow content to be disseminated among large audiences rapidly, and therefore potentially encountered by a large number of children.

---

<sup>812</sup> Youth Endowment Fund, 2022. [Children, Violence and Vulnerability](#).

<sup>813</sup> Note: The study was with 13 'vulnerable' children, which here means children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social Media](#).

<sup>814</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>815</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>816</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

- 7.6.49 An EU study among children aged 9-16 found that many children tend to link particular online risks to particular types of online services, and violent content was linked to video-sharing services 30% of the time.<sup>817</sup> Ofcom research also found that children most commonly mentioned social media services and video-sharing services, in addition to messaging services, when asked where they had most often encountered violent content.<sup>818</sup>
- 7.6.50 The evidence suggests that content encouraging or promoting violence is likely to be posted on social media services, as these services can enable users to construct an online identity that glamourises violence. A study from the US reported on “gang-associated” children and young adults aged 13-27 who selectively shared content to establish and maintain a violent reputation; for example, borrowing weapons to pose with online, or making violent threats online to people they know are “out of town”.<sup>819</sup>

#### *Messaging services*

- 7.6.51 Children also encounter violent content in more closed spaces such as messaging services. Ofcom research found that children often mentioned messaging services in relation to their experiences of violent content; local school and street fighting, and gang-related violence were the types of violent content they cited most often in relation to messaging services.<sup>820</sup>
- 7.6.52 Messaging services can be seen to offer more protection against enforcement or moderation than other services where children spend their time – particularly when they offer ephemeral or encrypted messaging. Refer to sub-section ‘User Communication: Ephemeral Messaging and Encrypted Messaging’ within this section for more information. This may encourage children to use such services to share violent content. A UK study reported an increase in encrypted messaging services and ephemeral messaging being used in the context of gang-related violence, due to the belief that these services cannot be monitored by law enforcement.<sup>821</sup>

#### *Gaming services*

- 7.6.53 Gaming services can carry the risk of exposing children to violent content via functionalities that enable users to communicate with each other while gaming. Ofcom research found that children experience violent content on gaming services from comments by other users in gaming chats (refer to sub-section ‘User Communication: Group Messaging and Direct Messaging’ within this section for more information).<sup>822</sup> And children cite gaming services as a place where they often see violence online: an NSPCC

---

<sup>817</sup> LSE Research Online (Livingstone, S., Kirwil, L., Ponte, C. and Staksrud, E.), 2014. [In their own words: what bothers children online?](#) [accessed 17 April 2024].

<sup>818</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>819</sup> Stuart, F., 2020. [Code of the Tweet: Urban Gang Violence in the Social Media Age](#). [accessed 17 April 2024].

<sup>820</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>821</sup> Whittaker, A., Densley, J. and Moser, K., 2020. [No two gangs alike: The digital divide in street gangs differential adaptations to social media](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>822</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

study reported that 21% of children and young adults aged 11-18 had seen violence and hatred on gaming services.<sup>823</sup>

- 7.6.54 Gaming services can contribute to children encountering violent content in the form of clips of violent game-play being posted online. Ofcom research found that many children cited gaming as a frequent source of violent content, due to edited clips of violent games circulating online.<sup>824</sup>
- 7.6.55 The evidence suggests that user characteristics are important in assessing the risk of harm from violent gaming content. For example, a risk may emerge when violent gaming content is encountered by children younger than the target audience of the game. Research conducted by the NSPCC reported that, when asked where they were most likely to see violence in gaming, children aged 8-14 most often said *Call of Duty* – a game rated 18+.<sup>825</sup>
- 7.6.56 Similarly, the extent to which violent gaming content can be considered realistic, and therefore have potential greater propensity for harm, may depend on the characteristics of the user. A small-scale study by the UK Council for Child Internet Safety reported that children with special educational needs can perceive gaming content to be more realistic than do their peers, so may be at greater risk of harm.<sup>826</sup> Refer to sub-section ‘User Demographics: Disability’ for more information.

#### *Discussion forum and chat room services*

- 7.6.57 Discussion forums can act as spaces where communities of users share content on specific, and sometimes more extreme, topics. They can therefore pose a risk of introducing children to more extreme forms of violent content. Ofcom research found that although only a minority of children were actively searching for violent content, those who did so were most likely to do it on social media, video sharing, chat room and discussion forum services.<sup>827</sup>
- 7.6.58 Discussion forums can contribute to children encountering more extreme violent content. Ofcom research reported that some of the more extreme violent content encountered by children had originated on discussion forums, but had then been posted to social media and video-sharing services that were more commonly used by children.<sup>828</sup>

---

<sup>823</sup> NSPCC statistic taken from a literature review commissioned by DCMS. The full NSPCC report, Net Aware Results, was unpublished so this source has not been individually reviewed. The statistic was cited on page 43 of the published literature review. Source: UK Council for Child Internet Safety (UKCCIS), 2017. [Children’s online activities, risks and safety: A literature review by the UKCCIS Evidence Group](#). [accessed 17 April 2024]. Subsequent references to this report throughout.

<sup>824</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>825</sup> UKCCIS, 2017. [Children’s online activities, risks and safety](#).

<sup>826</sup> UKCCIS and The Lucy Faithfull Foundation, 2011. [Children with special educational needs – internet safety concerns](#). [accessed 17 October 2023]. Subsequent references to this report throughout.

<sup>827</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>828</sup> The qualitative research was designed to be participant led and captured children’s perceptions of online violent content, therefore no definition as to what constitutes more extreme violence was given to participants. Analysis was done following fieldwork and more extreme depictions of violence tended to include murder, shootings and stabbings, and were often related to gang violence. Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

## Risk factors: functionalities and recommender systems

### User identification

#### *User profiles*

7.6.59 Several studies report violent content being shared on purpose-built user accounts, created specifically to disseminate violent content, which can contribute to the content spreading quickly and reaching a large number of users (including children). These accounts are identifiable and therefore discoverable to users, including children, through the user profiles that are associated with them. Ofcom research found that children are accessing violent content, mostly local school and street fights, through dedicated accounts that exist to disseminate it.<sup>829</sup> Similarly, a study in West Yorkshire among children and young adults aged 11-25 noted the use of accounts dedicated to distributing violent content.<sup>830</sup>

#### *Anonymous user profiles*

7.6.60 Anonymous user profiles risk increasing the ease with which violent content can be shared online, due to users' perception that there is reduced accountability as the content is not directly tied to an identity. Crest Advisory's research with 11-18-year-olds described how, in the context of gang violence, the ability to create anonymous profiles online has the potential to encourage the sharing of violent content and threats, as children and young adults assume their actions will not be traced back to them.<sup>831</sup>

7.6.61 Invitation-only anonymous accounts, dedicated to sharing, often local, violent content, exist online; these require users to be connected in order to access the content.<sup>832</sup> Due to the enhanced privacy of these accounts, evidence of the type of content shared is limited, but it is likely to be more extreme or personalised violent content. Revealing Reality's study on vulnerable children aged 13-17 from disadvantaged backgrounds reported on the use of such accounts, where content can only be seen if the user has been added by the account. Children reported that only those "known" locally by reputation were accepted, and unknown accounts were treated with suspicion.<sup>833</sup>

### User networking

#### *User connections*

7.6.62 Children report encountering violent content shared by other users who they are connected to online, including their friends. Children share violent content with their friends for a number of reasons. Refer to sub-section 'How violent content manifests online' within this section for more information.

7.6.63 Some functionalities enable children to establish a large number of user connections with people both known and unknown to them.<sup>834</sup> These connections can then become

---

<sup>829</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>830</sup> Social Finance, 2022. [Social media, psychological harm and violence among young people](#).

<sup>831</sup> Crest Advisory, 2022. [Fixing Neverland](#).

<sup>832</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>833</sup> Revealing Reality, 2023. [Anti-social Media](#).

<sup>834</sup> Revealing Reality's study on vulnerable children aged 13-17 experiences on social media reported how platform functionalities can present children with long lists of recommended contacts, through which they can add large numbers of friends, with often no limit on how many people could add them. Source: Revealing Reality, 2023. [Anti-social Media](#).



networks through which violent content can be rapidly distributed. Ofcom research described the experience of one 17-year-old participant who had thousands of ‘friends’ on a social media platform, many of whom were unknown to him, and regularly shared graphic, violent and gory content.<sup>835</sup>

- 7.6.64 The risk of user connections intersects with that of dedicated accounts for sharing violent content, as these accounts can appear on children’s recommended follower lists, and quickly amass hundreds of followers and become integrated in children’s networks. For example, a participant in the Revealing Reality study reported seeing a video of a stabbing from a ‘fights’ account which had added him.<sup>836</sup>
- 7.6.65 User connections enable the creation of large audiences and can help facilitate violent content going viral.<sup>837</sup> The more widely violent content is shared, the greater the number of child users who are exposed to it and put at risk of harm. Ofcom research reported that many children cited influencers and those with a large online following as sources of violent content, with children believing these individuals shared violent content because they knew it would draw the attention of children.<sup>838</sup>
- 7.6.66 Viral violent content can also risk provoking further violence. Some violent content, particularly peer fighting, is shared with the intent of humiliation. The size of the audience increases the threat of loss of “status” or “reputation” and can provoke real-life retaliation.<sup>839</sup>

#### *User groups*

- 7.6.67 User groups often involve large group chats, and this functionality can offer an easy way for users to share violent content to a wide audience. Refer to sub-section ‘User communication: group messaging’ within this section for more information.

#### *User tagging*

- 7.6.68 Reflecting the culture of sharing violent content among children, Ofcom research reported that children are tagging their friends in violent content they think they should see.<sup>840</sup> This increases the risk that children encounter violent content.

### **User communication**

#### *Livestreaming*

- 7.6.69 Children are watching livestreams of violent content. Ofcom research into violent content found that children had seen livestreams of violent content, mainly local school and street fights.<sup>841</sup>

---

<sup>835</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>836</sup> Revealing Reality, 2023. [Anti-social Media.](#)

<sup>837</sup> Circulated rapidly and widely from one internet user to another.

<sup>838</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>839</sup> Crest Advisory, 2022. [Fixing Neverland.](#)

<sup>840</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>841</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

### *Direct messaging*

- 7.6.70 Violent content is being shared via direct messages, which may make the content harder for children to avoid. Ofcom research reported that violent content sent to children in direct messages was typically from friends or people they knew offline.<sup>842</sup>
- 7.6.71 Gaming services can include functionalities which enable users to talk to each other while gaming, and the comments can be a source of violent messaging. Indeed, 76% of children aged 8-17 who play games online chat to other people while playing, through messaging or a headset.<sup>843</sup> Ofcom research found that children experienced violence in gaming due to violent comments sent by other users during play.<sup>844</sup>

### *Group messaging*

- 7.6.72 Violent content can be shared in group chats with many members, facilitating the spread of the content to a large audience while still in a closed environment.<sup>845</sup> Ofcom research heard that it was relatively commonplace for large group chats to be places where violent content is shared.<sup>846</sup> A Revealing Reality study found that children often reported being added to group chats where violent content was shared, both by people they knew and people they didn't.<sup>847</sup> Other Ofcom research also reported that children tended to share the more extreme forms of violent content on group messages.<sup>848</sup>
- 7.6.73 Group messaging may allow for children to be unintentionally introduced to violent content. Ofcom research found that children were being added to group chats without their consent, or option to decline, and then being exposed to violent content unexpectedly, since they were unaware of the purpose of the group chat they had been added to. The research also found that violent content was being unexpectedly shared in other innocuous groups that were not specifically labelled as being for violent content.<sup>849</sup>
- 7.6.74 Evidence indicates that some children are joining group chats dedicated to sharing violent content, often fighting content.<sup>850</sup> This can be due to a desire to stay up-to-date with fights that have recently taken place, without having to rely on their friends to send them the content, highlighting how the importance of peer influence for children can increase the risk of their engaging with violent content.<sup>851</sup>
- 7.6.75 Evidence suggests that violent content being shared in groups can contribute to provoking further violence offline, due to the increased speed of escalation of conflict and the threat of loss of reputation.<sup>852</sup> A study from Crest Advisory highlighted how the ease with which

---

<sup>842</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>843</sup> Ofcom, 2023. [Children's Media Literacy tracker](#).

<sup>844</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>845</sup> Note: The study was with 13 'vulnerable' children, which here means children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social Media](#).

<sup>846</sup> The report describes the experience of one 13-year-old child who was a member of several local groups known for sharing and reposting local "drama", as well as violent or graphic content. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>847</sup> Revealing Reality, 2023. [Anti-social Media](#).

<sup>848</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>849</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>850</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>851</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>852</sup> Revealing Reality, 2023. [Anti-social Media](#).

users can be added or removed from conversations, while simultaneously engaging in many others, increases the speed in which threats of violence escalate online, compared to what would have been feasible offline.<sup>853</sup>

- 7.6.76 As with direct messaging, some gaming services include functionalities which enable users to talk to each other in groups while gaming. These group chats can be a source of violent messaging: Ofcom research found that children had received violent messages in such chats from other users while playing.<sup>854</sup>

#### *Encrypted messaging*

- 7.6.77 The evidence suggests that violent content is being shared in encrypted messages due to the perception that this route offers protection against enforcement or moderation. A UK study into gang violence in London reported that participants believe there has been an increase in encrypted and ephemeral messaging services in the context of gang violence, due to the belief that these services cannot be monitored by law enforcement.<sup>855</sup>

#### *Ephemeral messaging*<sup>856</sup>

- 7.6.78 The evidence suggests that children are viewing and sharing violent content via disappearing messages as these allow the content to be seen, but then removed before it can be reported.<sup>857</sup> A study exploring what vulnerable children from disadvantaged communities aged 14-17 are seeing on social media reported that children perceive services with ephemeral messaging to be a “safer” place for the sharing of violent content, because most messages disappear after they are viewed.<sup>858</sup>

#### *Commenting on content and reacting to content*

- 7.6.79 As noted previously, violent content can often go viral. Virality can encourage the creation and sharing of new violent content, as the engagement the content receives can be perceived to validate or normalise the behaviours depicted.<sup>859</sup> Ofcom research into violent content online reported how some children aged 8-17 shared violent content to gain popularity, due to the likes and comments such posts would generate.<sup>860</sup>

#### *Posting content*

- 7.6.80 The ability to post content, particularly videos, poses a risk because content depicting violence, such as peer fights, can be posted in public settings that may reach a large audience. Posting in this way risks provoking retaliation in the form of further filming and sharing of violence between peers. Ofcom research into violent content found that local school and street fighting, and violent gang-related content, were often shared as stories

---

<sup>853</sup> Crest Advisory, 2022. [Fixing Neverland](#).

<sup>854</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>855</sup> Participants in the study consisted of ex-gang members, gang-affected youth, police officers and criminal justice workers, local authority workers (community safety, education, early help and terrorism prevention) and voluntary sector grassroots workers. Source: Whittaker et al., 2020. [No two gangs alike](#).

<sup>856</sup> User-to-user service functionality that allows users to send messages that are automatically deleted after they are viewed by the recipient, or after a prescribed period of time has elapsed.

<sup>857</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>858</sup> Revealing Reality, 2023. [Anti-social Media](#).

<sup>859</sup> Vannucci, A., Simpson, E., Gagnon, S. and Ohannessian, C., 2020. [Social media use and risky behaviors in adolescents: A meta-analysis](#). [accessed 27 February 2024].

<sup>860</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

and posts on messaging, video-sharing and social media services.<sup>861</sup> A study in West Yorkshire among children and young adults aged 11-25 reported on children filming playground fights and the footage being shared on social media.<sup>862</sup>

- 7.6.81 Evidence suggests that violent content is being posted on services where the post disappears after a certain time period, such as ‘stories’ that disappear after 24 hours. This may risk more extreme violent content being shared using this functionality, due to the perception that the content will be harder to moderate. A Revealing Reality study, focusing on what vulnerable children aged 14-17 from disadvantaged backgrounds were encountering on social media, reported that several children perceive services where most content disappears after being viewed, or after a certain time period, “to be a ‘safe’ place for people to share illicit or illegal content”.<sup>863</sup>

#### *Re-posting and forwarding content*

- 7.6.82 The evidence suggests that children are re-posting and forwarding violent content, which is contributing to the spread of the content online. Ofcom research reported that children describe it as “second nature” to screenshot/screen-record violent content they see online and then repost or share the content.<sup>864</sup>

### Content exploring

#### *User-generated content searching*<sup>865</sup>

- 7.6.83 Evidence suggests that children are searching for content they have heard about offline to satisfy their curiosity, and so as not to feel left out. Ofcom research found that, for children seeking out violent content, platform searches were most commonly mentioned, particularly to search for more extreme violent content that they thought they were less likely to see through a recommender system or without searching for it.<sup>866</sup>

#### *Content tagging*

- 7.6.84 Content tagging can make violent content easily accessible to children who seek it. Ofcom research found that children were using content tags warning users of inappropriate content in order to search for violent content.<sup>867</sup>
- 7.6.85 Users can create violent videos and disguise the true nature of the content both by initially mimicking age-appropriate content, and mis-labelling the content.<sup>868</sup> The use of content tagging in this way heightens the risk that children seeking age-appropriate

---

<sup>861</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>862</sup> Social Finance, 2022. [Social media, psychological harm and violence among young people](#).

<sup>863</sup> Revealing Reality, 2023. [Anti-social Media](#).

<sup>864</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>865</sup> User-generated content searching refers to a user-to-user service functionality allowing users to search for user-generated content by means of a user-to-user service.

<sup>866</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>867</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>868</sup> Papadamou K., Papasavva, A., Zannettou, S., Blackburn, J., Kourtellis, N., Leontiadis, I., Stringhini, G. and Sirivianos, 2019. [Disturbed YouTube for Kids: Characterizing and Detecting Disturbing Content on YouTube](#). [accessed 17 April 2023]. Subsequent references to this report throughout; An Ofcom study exploring how people are harmed online also found examples of adults accidentally watching violent content that had been mislabelled. For example, one user described thinking he was watching a piece of content about Game of Thrones that had a spoiler alert tag, but it was actually gore content. Even as an adult, aged 26-30, this exposure made him feel anxious, revolted and guilty. Source: Ofcom, 2022. [How people are harmed online: testing a model from a user perspective](#).

content will be unintentionally exposed to violent content. A study of disturbing content on a popular video-sharing service found that disturbing or restricted videos used the same tags as videos suitable for children.<sup>869</sup>

### *Hyperlinking*

7.6.86 Hyperlinks are used to share violent content, facilitating the spread of such content across platforms. Ofcom research found that links were commonly used in both direct messages and group chats, and often resulted in children unwittingly watching violent content when they weren't aware of what the link contained.<sup>870</sup> Children described how friends thought it was funny to surprise them with content in this way, reflecting the pressure children can feel to find such content amusing.

## Content storage and capture

### *Screen capturing or recording*

7.6.87 As discussed above, evidence suggests that it is “second nature” for children to screen-capture and record content shared in ephemeral or encrypted messaging, thereby allowing them to replay, forward, and repost the content.<sup>871 872</sup> This enables the spread of the content and can increase the number of children who see it and may be harmed by it. In the context of street fighting and gang violence, this functionality also risks increasing the likelihood of retaliation, due to the increased scale of the audience and the need to defend reputational status.<sup>873</sup>

## Recommender systems

### *Content recommender systems*

7.6.88 Services which deploy content recommender systems<sup>874</sup> could be at a higher risk for suggesting violent content to children. Refer to the Wider context for understanding risk

---

<sup>869</sup> The study defines ‘disturbing’ as “when it targets toddlers but it contains sexual hints, depiction of unusual eating habits (e.g., eating big portions of junk food), children driving, child abuse (e.g., children hitting each other), scream and horror sound effects, scary scenes or characters (e.g., injections, attacks by insects, etc.)”. ‘Restricted’ is defined as “when it contains content that is inappropriate for individuals under the age of 17. Such videos usually contain sexually explicit language, graphic nudity, pornography, violence (e.g., gaming videos featuring violence like God of War, or life-like violence, etc.), abusive/inappropriate language, online gambling, drug use, alcohol, or upsetting situations and activities”. The name of a well-known superhero was found in 28.7% of disturbing videos and 58% of restricted videos; similarly, ‘superhero’ itself appeared in 31.6% and 53.4% of disturbing and restricted videos respectively. Source: Papadamou K. et al., 2019. [Disturbed YouTube for Kids.](#)

<sup>870</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>871</sup> Revealing Reality’s study on vulnerable children aged 13-17 described how ‘stories’ were often screen-recorded to be shared more widely. As a result, participants reported that videos of fights between peers could re-emerge years after they were first shared and recirculated. Source: Revealing Reality, 2023. [Anti-social Media;](#) Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children.](#)

<sup>872</sup> While users can often screen-record or capture content using third-party services, screen recordings and captures are shared on U2U services as user-generated content, and some U2U services have dedicated screen-recording and screen-capturing functionalities.

<sup>873</sup> Catch 22, 2017. [Social Media as a Catalyst and Trigger for Youth Violence.](#)

<sup>874</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

factors section (Section 7.14) within this volume for more information on how recommender systems work and how they can pose a risk to children.

- 7.6.89 Children are being recommended violent content without searching for it. Ofcom research reported that recommender systems were generally stated as the main way in which children encountered violent content without seeking it out, largely from users they don't already have a connection with. Children said they felt they had no control over the content they were recommended, and therefore seeing more violent content felt inevitable.<sup>875</sup>
- 7.6.90 Auto-play functions have also been identified as increasing the risk of accidental exposure to violent content. Research commissioned by DCMS among children and young adults aged 9-18 found that children sometimes review the comments sections to assess whether they want to view the content, and auto-play was seen to take away this agency, particularly on platforms where content is auto-played without comments being visible.<sup>876</sup>
- 7.6.91 Users can upload videos with violent themes featuring popular cartoon characters.<sup>877</sup> Due to the similarity between these videos and age-appropriate content, this can increase the risk that recommender systems will inadvertently promote violent content to children. A study into content targeted at toddlers on a popular video-sharing service estimated that there is a 45% chance that a toddler who starts watching non-disturbing videos will be recommended inappropriate ones within ten recommendations.<sup>878</sup>
- 7.6.92 There is a culture of sharing violent content among children, with some actively searching for it. Recommender systems are commonly designed to optimise user engagement, and learn about users' preferences through implicit (e.g. viewing multiple times) and explicit (e.g. liking, sharing, and commenting) user feedback. Therefore, the level of engagement with violent content may lead these systems to promote further content that is harmful to children. When harmful content is repeatedly encountered by a child, this may lead the child to experience cumulative harm.<sup>879</sup>

---

<sup>875</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>876</sup> Children described how seeing comments saying the video was “disgusting” could act as a signpost to avoid the content. Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>877</sup> Please see ‘Guidance on violent content’ (Section 8.8) for more detail on what Ofcom considers to be, or not to be, violent content. Some examples of content listed as not meeting the definition of Priority Content, may still be inappropriate for children in certain age groups (e.g. younger children).

<sup>878</sup> Papadamou et al, 2019. [From Disturbed YouTube for Kids](#).

<sup>879</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Register (Section 7) of this volume.

# 7.7 Harmful substances content

**Warning: this section contains references to content that may be upsetting or distressing.**

## Summary: risk of harm from harmful substances content

In this section, we consider content that encourages a person to ingest, inject, inhale or in any other way self-administer (i) a physically harmful substance, or (ii) a substance in such a quantity as to be physically harmful.

This harm manifests online in several ways. The ingestion or consumption of harmful substances, such as illegal and controlled drugs, can be encouraged via the publication of posts and videos that actively or expressly encourage the use of a particular substance.

### *Service type risk factors:*

Content promoting and encouraging the ingestion of harmful substances has been documented as manifesting on social media, video-sharing services. Due to the risks they present, these service types have been included in the draft Children's Risk profiles.<sup>880</sup>

### *User base risk factors:*

The evidence we have assessed for this section suggests that the age of children impacts how children experience this harm.

### *Functionalities and recommender systems risk factors:*

Functionalities that increase the risk of harm include posting content and content tagging. These functionalities can increase the likelihood of children viewing and finding this form of content and therefore they have been included in the draft Children's Risk Profiles. Some other functionalities contribute to the dissemination of harmful substances content, such as livestreaming and hyperlinks.

## Introduction

- 7.7.1 This sub-section summarises our assessment of the risks of harm to children, in different age groups, presented by content which encourages a person to ingest, inject, inhale or in any other way self-administer a physically harmful substance, or a substance in such a quantity as to be physically harmful ('risks of harm'). This is a category of priority content that is harmful to children.
- 7.7.2 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register (Section 7). 'Harm' means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.7.3 We will use the term 'harmful substances content' to refer to this type of content throughout this section.

---

<sup>880</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.



- 7.7.4 In the draft Guidance on Content Harmful to Children later in this volume, we provide guidance on identifying harmful substances content. In summary, we consider physically harmful substances, or substances that may be harmful when used to excess, to include:
- a) illegal drugs or psychoactive substances;
  - b) alcohol and tobacco products (which it is not legal to sell to children in the UK due to the fact they could cause them harm);
  - c) unregulated medicines, prescription medicines without a prescription, and non-prescription medicines in excess;
  - d) medical or cosmetic substances or treatments administered contrary to regulation;
  - e) substances not intended for human consumption.
- 7.7.5 We consider harmful substances content to actively or expressly encourage the use of harmful substances, such as those listed above. This is likely to include a recommendation or call to action. Examples include content calling on users to try illegal drugs or psychoactive substances, content recommending abuse of steroids as part of a fitness regime, or directions for use of cosmetic products that regulation determines should be administered by qualified professionals. Refer to our draft Guidance on Content Harmful to Children (Section 8.9) later in this volume for contextual detail and further examples of what Ofcom considers to be, or not to be, harmful substances content.
- 7.7.6 Children can also be encouraged to ingest, inhale or otherwise consume harmful substances as part of other harms to children discussed in the draft Children’s Register of Risks. Details on these types of harmful content can be found in the relevant section. These include harmful substances which are consumed:
- a) as part of online challenges (see Dangerous Stunts and Challenges at Section 7.8),
  - b) in the encouragement or promotion of eating disorders (see Eating disorder content at Section 7.3) and,
  - c) in the context of suicide and self-harm content (see Suicide and self-harm content at Section 7.2).
- 7.7.7 The evidence base relating to harmful substances content is limited so some of the evidence we have described in this section relates to content which is broader than the definition of the ingestion of harmful substances in the Online Safety Act 2023 (‘the Act’). For example, some of the evidence we include may not relate to content actively or expressly encouraging the use of harmful substances. Where such evidence has been included, it is because we consider it relevant to understanding the risk of harm from harmful substances content.

## How harmful substances content manifests online

---

- 7.7.8 This sub-section looks at how harmful substances content manifests online and how children in different age groups may therefore be at risk of harm.
- 7.7.9 Harmful substances content is present in a range of contexts and formats, often from users talking about their own experiences.<sup>881</sup> This content can also appear in several

---

<sup>881</sup> Rutherford B.N., Lim C. C. W., Johnson B., Cheng B., Chung J., Huang S., Sun T., Leung J., Stjepanović D., Chang G. C. K., 2023. [#Turntrending: a systematic review of substance use portrayals on social media platforms](#), *Addiction*, 118(2):206-217. [Accessed 18 April 2024] Subsequent references to this report throughout.

spaces and communities. Some harmful substances are promoted as means to escape, and experience pleasure or ‘highs’, while others are promoted as a means to treat medical conditions or aesthetic concerns.

- 7.7.10 Some types of harmful substances content are designed to circumvent services’ automated content moderation systems. An investigation into the promotion of the consumption of dangerous substances as ‘natural’ or ‘herbal’ abortion remedies found that text content encouraging the use of these substances as abortifacients<sup>882</sup> was hidden within passages of unrelated text, or phrased as fake warnings, to bypass platforms’ automated content moderation systems. Other posts promoting dangerous substances for these purposes use codewords, deliberate misspellings and the replacement of letters with special characters or numbers to avoid detection by automated content moderation systems.<sup>883</sup>

## Presence

- 7.7.11 Measuring the presence of any type of harmful substances content is challenging. However, evidence indicates that children are at risk of encountering several specific types of harmful substances content.
- 7.7.12 For example, nearly a third of 11–17-year-olds have encountered content promoting e-cigarettes. The campaign group Action on Smoking and Health’s Smokefree GB Youth Survey 2023 found that 32% of 11–17-year-olds were aware of e-cigarettes being promoted online. The report notes that some of the most common places participants reported seeing e-cigarettes promoted online were popular video-sharing and social media services.<sup>884</sup>
- 7.7.13 Evidence also indicated that children were encountering content relating to medical treatments or enhancements that are illegal, and/or which can present a risk of harm if not administered by qualified individuals. An investigation into the promotion of the abuse of steroids and steroid-like drugs to teenagers on a popular video-sharing service found that many of the videos posted included first-hand accounts of the use of these substances.<sup>885</sup> Some children are also encountering content encouraging viewers to pursue cosmetic treatments, including the injection of botulinum toxin and hyaluronic acid fillers, which are illegal for practitioners to administer to under-18s in England. Online content relating to these treatments can outline how to access these surgeries and describes how users can ‘do it yourself’.
- 7.7.14 Other content falsely promotes potentially harmful substances as medical treatments. For example, a report from the Institute for Strategic Dialogue found that content promoting

---

<sup>882</sup> A substance that is associated with increased abortion incidence.

<sup>883</sup> NewsGuard (Sadeghi, M., and Pavilonis, V.), 2022. [Special Report: Videos Promoting Dangerous Herbal Abortions Continue To Circulate on TikTok Despite Platform’s Pledge To Crack Down, NewsGuard Finds](#), 25 July. [accessed 18 April 2024] Subsequent references are made to this article throughout.

<sup>884</sup> Action on Smoking and Health, 2023. [Use of e-cigarettes \(vapes\) among young people in Great Britain](#), [accessed 18 April 2024]. Subsequent references throughout.

<sup>885</sup> Note: We have considered the limitations of this study when presenting its findings. While the report did find evidence of hashtags and language within video posts being used to target teenagers, the report authors could not access data on service users under 18, and so viewing figures in this report are for 18-24-year-olds. Source: Center for Countering Digital Hate, 2023. [TikTok’s Toxic Trade: How TikTok promotes dangerous and potentially illegal steroids and steroid-like drugs to teens](#), [accessed 18 April 2024]. Subsequent references are made to this report throughout.

self-administered abortion ‘reversal’ remedies<sup>886</sup> continues to be found on social media services, with false information about abortions found in text posts, videos and image-based posts.<sup>887</sup> Another example is content promoting the consumption of highly concentrated alcohol to ‘disinfect’ the body and kill the Covid-19 virus. While there is no direct evidence of children encountering this specific content, its presence on U2U services suggests that children may be at risk of encountering it, or similar content.<sup>888</sup>

## Impacts

- 7.7.15 Encountering harmful substances content has several outcomes. Children who see such content risk not understanding the potentially harmful outcomes of substance use. The impacts include engaging in harmful substance-related behaviours that adversely affect health, and potentially result in loss of life in worst case scenarios.
- 7.7.16 Harmful substances content can also be mistaken for accurate information on disease prevention and control, or other medical treatments. This can have serious consequences for an individual’s physical wellbeing, and public health, if acted upon, especially if the alleged ‘treatment’ is not only ineffective, but physically harmful. Examples include the consumption of concentrated alcohol to treat Covid-19, and some substances promoted as methods for ‘herbal’ or ‘natural’ abortions causing damage to internal organs like the kidneys or liver.<sup>889</sup>
- 7.7.17 In the worst cases, children can be encouraged to consume substances that lead to serious injury or loss of life. There are examples of this happening when children consume harmful substances, or harmful quantities of a substance, in the context of challenges. In the US, a 14-year-old girl was found to have died following ingesting a large amount of diphenhydramine while taking part in a video-sharing service challenge.<sup>890</sup> More detail on this can be found in the Dangerous stunts and challenges section (Section 7.8).
- 7.7.18 Harmful substances content can confuse children about the age-appropriateness and safety of some acts that they see other children participating in online, such as smoking tobacco products or nicotine vaping, both of which have harmful health implications and it is illegal to sell children such products in the UK. A DCMS-commissioned study on online harms experienced by children and young adults aged 9-18 found that participants questioned the “illegality”, for children, of acts like vaping, because they frequently saw

---

<sup>886</sup> These remedies promise to reverse the effects of an abortion pill.

<sup>887</sup> Institute for Strategic Dialogue (Martiny, Clara; Visser, Francesca; Jones, Isabel; Castillo; Small, Allison), 2022. [Analysis of Social Media Platform’s Response 100 Days After US Supreme Court Decision Overturning Roe V. Wade](#). [accessed 18 April 2024]. Subsequent references to this report throughout.

<sup>888</sup> Note: after following this suggested ‘disinfection’ method, approximately 800 people have died, 5,876 people have been hospitalised and 60 developed blindness after drinking methanol as a cure for Covid-19. Source: Islam MS, Sarkar T, Khan SH, Mostofa Kamal AH, Hasan SMM, Kabir A, Yeasmin D, Islam MA, Amin Chowdhury KI, Anwar KS, Chughtai AA, Seale H., 2020. [COVID-19-Related Infodemic and Its Impact on Public Health: A Global Social Media Analysis](#), *American Journal of Tropical Medicine and Hygiene*, 103(4), pp. 1621-1629. [accessed 18 April 2024]

<sup>889</sup> NewsGuard (Sadeghi, M., and Pavilonis, V.), 2022. [Special Report: Videos Promoting Dangerous Herbal Abortions Continue To Circulate on TikTok Despite Platform’s Pledge To Crack Down, NewsGuard Finds](#).

<sup>890</sup> Elkhazreen, A.; Poulos, C.; Zhang, X.; Cavanaugh, J; Cain, M., 2021, [A TikTok “Benadryl Challenge” death – A case report and review of the literature](#), *Journal of Forensic Science*, 68, pp. 339 – 342. [accessed 18 April 2024] Subsequent references to this article throughout.

their peers displaying these behaviours in social media posts.<sup>891</sup> Another study argues that greater use of social media is associated with an increased willingness and intention to use e-cigarettes, a more positive attitude towards them, and lower perceived danger from their use, though this study used advertising-style posts to investigate this.<sup>892</sup> While some of the content in these studies includes paid-ads and may not include active or express encouragement, they demonstrate how content relating to harmful substances can create false perceptions about the legality and safety of certain substances. Moreover, some advertising content which promotes harmful substances such as alcohol and tobacco-products may meet the definition of user-generated content under the Act, such as sponsored content shared by influencers. Refer to Guidance on harmful substances content (Section 8.9) for more detail.

- 7.7.19 Should children use substances such as alcohol, e-cigarettes and tobacco-based products on account of harmful substances content, these carry risk of addiction and harmful health impacts. The National Health Service (NHS) argues that the use of nicotine (which is found in cigarettes, some e-cigarettes and other tobacco-based products) is riskier for young people (including children) than adults, as evidence suggests that their developing brains are more susceptible to nicotine’s addictive effects.<sup>893</sup>

## Evidence of risk factors on user-to-user services

---

- 7.7.20 We consider that the risk factors below may increase the risks of harm to children relating to content that encourages the ingestion or other self-administration of harmful substances. This is also summarised in the grey box at the start of this section.

### Risk factors: User base

#### User demographics

- 7.7.21 The following sub-section outlines key evidence of user base demographic factors and risks of harm, which can include protected characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.
- 7.7.22 Research suggests that user base characteristics, including **age** and **gender**, could lead to an increased risk of harm to children.

---

<sup>891</sup> Ecorys (commissioned by the Department for Digital, Culture, Media and Sport), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 18 April 2024] Subsequent references to report throughout. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>892</sup> Note: We have considered the limitations of this study when presenting its findings. The study presented 135 participants aged 13-18 in California with social media (peer or advertisement) posts to then examine their beliefs, willingness and intention to use e-cigarettes. Vogel E.A., Ramo D.E., Rubinstein M.L., Delucchi K.L., Darrow S.M., Costello C., Prochaska J.J., 2021. [Effects of Social Media on Adolescents’ Willingness and Intention to Use E-Cigarettes: An Experimental Investigation](#), *Nicotine & Tobacco Research*, 23:4, pp.694-701. [accessed 18 April 2024] Subsequent references to this report throughout.

<sup>893</sup> National Health Service (NHS), 2024. [Young people and vaping](#), [accessed 18 April 2024].

## Age

- 7.7.23 There is limited evidence of different age groups being at disproportionate risk of harm from this content. However, it is likely that some age groups will be more susceptible to the influence of encountering this type of content online given their developmental stage.
- 7.7.24 The onset of puberty (within the transition years 10-12) drives neurobiological changes that influence cognitive development and increase risk-taking and impulsive behaviour. This continues into adolescence (13-15) when peer influence becomes particularly important, risk taking, and impulsive behaviour increases and teenagers develop and assert their personalities by making choices e.g. about their interests. See Recommended age groups at Section 7.15 for more detail on this. The presence of harmful substances content online, particularly if among peer groups or children of similar ages are actively encouraging use of substances, is likely to normalise this behaviour, make it appear socially acceptable to children and thereby encourage consumption.
- 7.7.25 While not directly linked to online content, there is evidence to suggest older children are more likely to consume harmful substances. NHS data suggests the number of children in England having ever had an alcoholic drink increases with age, from 13% of 11-year-olds to 65% of 15-year-olds<sup>894</sup> and another survey suggests the same in relation to smoking e-cigarettes (15% for 11-15-year-olds to 34% for 16-17-year-olds).<sup>895</sup>

## Gender

- 7.7.26 The differences by gender in the vulnerability of children to content that encourages the consumption of harmful substances varies according to the type of harmful substance. Unsurprisingly, girls are more vulnerable to content promoting abortion ‘reversal’ pills or fake abortion methods.

## Risk factors: Service types

- 7.7.27 Research suggests that children are at an increased risk of encountering content encouraging the ingestion of dangerous substances on the following service types: **social media services and video-sharing services**. A U2U service may simultaneously include more than one service type, and some might also be a feature of a wider service.

### *Social media services*

- 7.7.28 Evidence suggests that children are likely to encounter harmful substances content on social media services, and that the use of social media services can result in increased intention to use some harmful substances.
- 7.7.29 One in four 16-24 year olds (24%) report seeing illicit drugs for sale on social media. Most of these (72%) reported that they had seen illegal drugs advertised for sale on social media websites or apps about once a month or more often.<sup>896</sup> While these adverts are illegal (see Illegal substances section of our [Illegal Harms Register](#)), their presence reflects the quantity of drug-related content that children encounter online, some of which may

---

<sup>894</sup> National Health Service (NHS), 2022. [Smoking, Drinking and Drug Use among Young People in England, 2021](#), 6 September. [accessed 18 April 2024].

<sup>895</sup> Action on Smoking and Health, 2023. [Use of e-cigarettes \(vapes\) among young people in Great Britain](#),

<sup>896</sup> Volteface, 2019. [DM for Details: Selling Drugs in the Age of Social Media](#), [accessed 18 April 2024].

be generally promoting the consumption of substances, as opposed to selling them, and so contributing to the normalisation of substance use.

- 7.7.30 As noted above, another study argues that greater use of social media is associated with a greater willingness and intention to use e-cigarettes, as well as more positive attitudes and lower perceived danger from e-cigarette use.<sup>897</sup>

#### *Video-sharing services*

- 7.7.31 Evidence suggests that children can encounter harmful substances content on video-sharing services. An investigation by the Center for Countering Digital Hate into the promotion of the use of steroids and steroid-like drugs found that videos posted on popular video-sharing services targeted teenagers (see posting content functionality), encouraging them to take steroids or steroid-like drugs to achieve body-building goals.<sup>898</sup>
- 7.7.32 An investigation into the promotion of ‘natural’ or ‘herbal’ abortions on a video-sharing service, including promoting the ingestion of substances to induce abortion, identified 102 videos promoting herbal recipes to induce abortions.<sup>899</sup>
- 7.7.33 There are cases in which online content encourages the ingestion of harmful substances as part of a challenge, and these indicate that this content is being posted and encountered on video-sharing services. As noted above, a case report into the death of a 14-year-old girl in the US, who died after ingesting a large amount of diphenhydramine while taking part in a video-sharing service challenge, noted that this challenge encouraged children and teens to record themselves taking large amounts of these substances, and to publish the results on video-sharing services.<sup>900</sup>

## Risk factors: Functionalities and recommender systems

### User communication

#### *Livestreaming*

- 7.7.34 Studies have found that users sometimes post livestreams of themselves after ingesting a drug or psychoactive substance, with some showcasing the ‘high’ after consumption, which may encourage viewers to try the substance for themselves. However, it is important to note that these streams do not necessarily promote the taking of the drug,

---

<sup>897</sup> Note: The study presented 135 participants aged 13-18 in California with social media (peer or advertisement) posts to then examine their beliefs, willingness and intention to use e-cigarettes. Source: Vogel E.A., Ramo D.E., Rubinstein M.L., Delucchi K.L., Darrow S.M., Costello C., Prochaska J.J., 2021. [Effects of Social Media on Adolescents' Willingness and Intention to Use E-Cigarettes: An Experimental Investigation](#).

<sup>898</sup> Note: We have considered the limitations of this study when presenting its findings. While the report did find evidence of hashtags and language within video posts being used to target teenagers, the report’s authors could not access data on service users under 18, so viewing figures in this report are for 18-24-year-olds. Source: Center for Countering Digital Hate, 2023. [TikTok’s Toxic Trade: How TikTok promotes dangerous and potentially illegal steroids and steroid-like drugs to teens](#).

<sup>899</sup> Note: the study found that 102 herbal abortion videos remained on the service as of July 2019. Source: NewsGuard (Sadeghi, M., and Pavilonis, V.), 2022. [Special Report: Videos Promoting Dangerous Herbal Abortions Continue To Circulate on TikTok Despite Platform’s Pledge To Crack Down, NewsGuard Finds](#)

<sup>900</sup> Elkhaszeen, A.; Poulos, C.; Zhang, X.; Cavanaugh, J; Cain, M., 2021. [A TikTok “Benadryl Challenge” death – A case report and review of the literature](#).



and some serve as warnings or cautionary tales, highlighting the negative impacts of drug use.<sup>901</sup>

### *Posting content*

- 7.7.35 Posting content is fundamental to the risk of children encountering harmful substances content. A systematic review of studies covering a large sample of substance-related posts on various social media and video-sharing services found that a majority of this content was positive in its depiction of substance use.<sup>902</sup>
- 7.7.36 Images and videos can often be posted to depict and promote the ingestion of harmful substances. For instance, a report from the Institute for Strategic Dialogue found that content promoting self-administered abortion ‘reversal’ remedies<sup>903</sup> continues to be found on social media services, with false information about abortions found in posts. These posts typically contained videos and images.<sup>904</sup> An investigation into the promotion of steroids and steroid-like drugs on a video-sharing site by campaign group the Center for Countering Digital Hate found evidence of child users posting videos claiming to use these substances to achieve body-building goals, potentially creating an environment in which under-18s encourage each other to abuse these substances.<sup>905</sup>

### *Content tagging*

- 7.7.37 Hashtags can be used to direct children to content promoting the ingestion of harmful substances. An investigation into the promotion of steroids and steroid-like drugs to teens on a popular video-sharing service found that some influencers used hashtags including ‘teen’ to target teenage audiences with content encouraging the use of these drugs. The investigation found that US users aged 18-24 had viewed videos promoting steroid-like drug abuse up to 420 million times over the last three years. While this service does not provide data on the number of views by users aged under 18, these figures suggest that there could be a younger audience for these videos, due both to the high number of views and the high level of use of this service by under-18s.<sup>906</sup>
- 7.7.38 Research has found that specific hashtags are being used on posts about new psychoactive substances, and these hashtags can be used to find content about these

---

<sup>901</sup> Miliano, Cristina, Giulia Margiani, Liana Fattore, and Maria Antonietta De Luca, 2018. [Sales and Advertising Channels of New Psychoactive Substances \(NPS\): Internet, Social Networks, and Smartphone Apps](#), Brain Sciences, 8:7.

<sup>902</sup> Rutherford B.N., Lim C. C. W., Johnson B., Cheng B., Chung J., Huang S., Sun T., Leung J., Stjepanović D., Chang G. C. K., 2023. [#Turntrending: a systematic review of substance use portrayals on social media platforms](#).

<sup>903</sup> These remedies promise to reverse the effects of an abortion pill.

<sup>904</sup> Institute for Strategic Dialogue (Martiny, Clara; Visser, Francesca; Jones, Isabel; Castillo; Small, Allison), 2022. [“Analysis of Social Media Platform’s Response 100 Days After US Supreme Court Decision Overturning Roe V. Wade”](#).

<sup>905</sup> Note: We have considered the limitations of this study when presenting its findings. While the report did find evidence of hashtags and language within video posts being used to target teenagers, the report authors could not access data on platform users under 18, and so viewing figures in this report are for 18-24-year-olds. Source: Center for Countering Digital Hate, 2023. [TikTok’s Toxic Trade: How TikTok promotes dangerous and potentially illegal steroids and steroid-like drugs to teens](#).

<sup>906</sup> Centre for Countering Digital Hate, 2023. [TikTok’s Toxic Trade: How TikTok promotes dangerous and potentially illegal steroids and steroid-like drugs to teens](#).



substances on social networks.<sup>907</sup> The promotion of this content increases the risk that children will encounter it.

- 7.7.39 Users posting harmful substances content to social media and video-sharing services can also use obfuscation to prevent these services removing content that violates their terms of service. For example, posts promoting dangerous substances for use as ‘herbal’ or ‘natural’ abortion methods use codewords, deliberate misspellings and the replacement of letters with special characters or numbers to avoid detection by automated content moderation systems.<sup>908</sup>

### *Hyperlinking*

- 7.7.40 Hyperlinks can increase the risk of harm from exposure to substance-related content by directing children to buy the substance in question. An investigation into the promotion of the abuse of steroids and steroid-like drugs to teens and young people on a popular video-sharing service in the US found that videos encouraging teenagers to hide the use of these substances from their parents were sometimes accompanied by hyperlinks to websites selling these drugs, and a promotional code to reduce their cost.<sup>909</sup> In these cases, hyperlinks can sometimes lead children to illegal content (see Sale of drugs section in our [Illegal Harms Register](#) in the Illegal Harms Consultation).

## Recommender systems

### *Content recommender systems*

- 7.7.41 Services which deploy content recommender systems<sup>910</sup> could be at higher risk for recommending and suggesting harmful substances content to children. Detailed explanation on how recommender systems work and how they can pose a risk to children is set out in our Wider context for understanding risk factors section (Section 7.14).
- 7.7.42 The evidence suggests that children are encountering content promoting consumption of dangerous substances through recommender systems. Qualitative research commissioned by DCMS into the online harms experienced by children and young people aged between 9 and 18 found that content promoting substances that are illegal or age-restricted products for children, including the sale and use of illegal drugs or substances, smoking, and drinking alcohol, appeared in the participants’ ‘recommended’ feeds (feeds of content selected for users by service algorithms). Children and young people reported skipping past or clicking ‘not interested’ to try to stop the algorithms presenting this

---

<sup>907</sup> Miliano, Cristina, Giulia Margiani, Liana Fattore, and Maria Antonietta De Luca, 2018. [Sales and Advertising Channels of New Psychoactive Substances \(NPS\): Internet, Social Networks, and Smartphone Apps](#).

<sup>908</sup> NewsGuard, (Sadeghi, M., and Pavilonis, V.), 2022. [Special Report: Videos Promoting Dangerous Herbal Abortions Continue To Circulate on TikTok Despite Platform’s Pledge To Crack Down, NewsGuard Finds](#).

<sup>909</sup> Note: We have considered the limitations of this study when presenting its findings. While the report did find evidence of hashtags and language within video posts being used to target teenagers, the report authors could not access data on platform users under 18, and so viewing figures in this report are for 18-24-year-olds. Source: Centre for Countering Digital Hate, 2023. [TikTok’s Toxic Trade: How TikTok promotes dangerous and potentially illegal steroids and steroid-like drugs to teens](#).

<sup>910</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

content to them. One participant in the case study featured in this research reported that this content re-appeared in their feed after about a year.<sup>911</sup>

- 7.7.43 When harmful content is repeatedly encountered by a child, this may lead the child to experience 'cumulative harm'.<sup>912</sup> In this context, the cumulative impact of harmful substances content is related to the normalisation of the harmful behaviour it is reflecting. Normalising this behaviour among children is likely to encourage, or at least not discourage, children from consuming those harmful substances.

---

<sup>911</sup> Ecorys (commissioned by the Department for Digital, Culture, Media and Sport), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

<sup>912</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Register at Section 7.

## 7.8 Dangerous stunts and challenge content

**Warning: this section contains references to content that may be upsetting or distressing, including mention of suicide.**

### Summary: risk of harm from dangerous stunts and challenges content

In this section, we consider content that encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it, or to someone else.

This content typically manifests as videos, posted to social media or video-sharing services, but can also appear in image and text-based content.

#### *User base risk factors:*

Research suggests that boys are more likely than girls to participate in dangerous stunts and challenges, and also more likely to take part once they reach their teenage years.

#### *Service type risk factors:*

Research suggests that social media and video-sharing services are service types which can increase the risk of dangerous stunts and challenges content appearing online. We have included these service types in the draft Children's Risk Profiles.<sup>913</sup>

#### *Functionalities and recommender systems risk factors:*

Posting content, content tagging, user connections and content recommender systems are functionalities that increase the risk of harm. Each of these functionalities helps raise children's awareness of dangerous stunts and challenges, whether through the depiction of participating in one of these stunts or challenges, or by inviting the child to participate through tagging their username. These functionalities have been included in the draft Children's Risk Profiles.

The ability to react to content, commenting on content and re-post or forward content can also play a role in children encountering dangerous stunts and challenges content as they can contribute to virality and encourage users to share this content.

## Introduction

- 7.8.1 This section summarises our assessment of the risks of harm to children, in different age groups, presented by content on U2U services which encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person

---

<sup>913</sup> The draft Children's Risk Profiles identify risk factors that the draft Children's Register suggests may be particularly relevant to the risk of certain types of content harmful to children. These Children's Risk Profiles are published as part of our draft Children's Risk Assessment Guidance for services (Annex 6), as services must take account of them when doing their own risk assessments.

who does it or to someone else ('risk of harm'). This kind of content has been designated as priority content that is harmful to children.<sup>914</sup>

- 7.8.2 We set out the characteristics of U2U services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to the Register, Section 7 of this volume. 'Harm' means physical or psychological harm. Harm can also be cumulative<sup>915</sup> or indirect.
- 7.8.3 This section will use the phrase 'content depicting dangerous stunts and challenges' to refer to the content described above, or 'challenge content' to describe content depicting challenges more broadly.
- 7.8.4 Dangerous stunts and challenges are trending topics, and this content is commonly found on social media services. The challenges or stunts vary, and it is important to note that not all online challenges are dangerous. Some, like the 'ALS Ice Bucket Challenge', popular in 2014, encouraged social media users to pour ice-cold water over themselves and film it to raise money for ALS research. The challenge raised approximately \$135m worldwide.<sup>916</sup>
- 7.8.5 However, to encourage participation, online challenges are often designed to be enticing and/or exciting for children and young adults. This can manifest in popular challenges having an element of risk, with some challenges encouraging individuals to harm themselves, others, or property.<sup>917</sup> Examples of viral challenges include choking challenges, ingesting harmful substances, or applying harmful substances to the skin. Risks can range from minor physical harm to substantial injury, permanent harm, and in extreme cases death.<sup>918</sup>
- 7.8.6 In the draft Guidance on Content Harmful to Children later in this volume, we provide guidance on identifying content depicting dangerous stunts and challenges, including examples of what Ofcom considers to be, or considers not to be, content depicting dangerous stunts and challenges. Dangerous stunt and challenges content involves people recording themselves online doing something that is difficult or risky, sometimes as part of a challenge. Examples include content encouraging or providing instructions for partaking in a stunt or challenge or content encouraging others to emulate stunts carried out by professionals that could cause serious injury if emulated. For more detail and contextual considerations, please refer to Guidance on dangerous stunts and challenges content (Section 8.8).
- 7.8.7 Due to limitations in the evidence base available, some of the evidence described in this section relates to content broader than the definition of content depicting dangerous stunts and challenges in the Act. For example, we have also included some evidence

---

<sup>914</sup> Section 61(5) of the Online Safety Act 2023 ('the Act').

<sup>915</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in Section 7, the Introduction to the draft Children's Register of Risks.

<sup>916</sup> ALS Therapy Development Institute, "[ALS Ice Bucket Challenge](#)". [accessed 26 February 2024]. Note: ALS stands for 'Amyotrophic lateral sclerosis' which is a progressive neurodegenerative disease.

<sup>917</sup> UK Safer Internet Centre, 2024. [De-escalating and responding to harmful online challenges](#), [accessed 21 February 2024].

<sup>918</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024]. Note this study was commissioned by TikTok.

relating to challenges which may fall into other categories of harmful content. Challenges that encourage acts of self-harm or suicide would likely be considered ‘suicide or self-harm content’ (a primary priority type of content) or ‘illegal content promoting suicide and self-injury’ (see relevant section in the [Illegal Harms Register](#)). These examples have been included because they provide useful insight into the characteristics of services that are relevant to the risk of children encountering content relating to dangerous stunts and challenges.

## How dangerous stunt and challenge content manifests online

---

- 7.8.8 This sub-section looks at how dangerous stunt and challenge content manifests online, and how children may be at risk of harm.
- 7.8.9 Dangerous stunts and challenges typically manifest as videos encouraging other users to attempt the same stunt or challenge. Harm is most likely to occur when children encounter this content and subsequently decide to participate or emulate the stunt or challenge. Harm can also occur when children decide to pass the challenge on to other children, including by directly sharing the content. Understanding the risk of harm includes considering both the risk of encountering this content, and the likelihood of children partaking in the challenge or emulating the stunt.
- 7.8.10 Children participate in harmful and non-harmful challenges for a variety of reasons. Gaining engagement from others on the content they post is an important motivating factor. A survey of 5,400 teenagers aged 13-19 in a variety of countries, including the UK, found that the most common reason teens took part in challenges was to gain views, comments and likes. Half of the teens in the survey included this as one of their top three reasons for participation (50%), and for 22% it was their top-ranking reason. 919 A survey of adult and child participants in India into the motivations behind participation in viral online challenges found that respondents’ likelihood of participation increased by 54% if an influencer had participated in the challenge.<sup>920</sup>
- 7.8.11 Participating in challenges is associated more broadly with satisfaction and affirmation. A study of 10-14-year-olds found that 58% agreed that performing a dare or challenge made them feel good.<sup>921</sup> In a worldwide study among 13-19-year-olds, 46% of teens included ‘impressing others’ as one of their top three main reasons for participation.<sup>922</sup>
- 7.8.12 Social pressure also drives desire to partake in a challenge. Children participate in challenges in the hope that others will do the same. The same study found that 71% of

---

<sup>919</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>920</sup> Note: Figures have been rounded so appear different to as in the report. The study sample of 259 included both adults and children, with participants split into the following age groups: under-18, 19-24 years-old, 25-30 years-old, 31-36 years-old and over 36-years old. The study focused on participants aged 19-24 years-old and 25-30 years-old in India. Source: Shroff, N., Shreyass, G., and Gupta, D., 2021. [Viral Internet Challenges: A Study on the Motivations Behind Social Media User Participation, Information and Communication Technology for Intelligent Systems](#), 196. [accessed 15 April 2024].

<sup>921</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>922</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

10-14-year-olds liked others to follow and to perform the dare or challenge they had performed. The study also found that pressure from peers can also lead children to overcome their reluctance to participate in challenges. More than a third of respondents (36%) agreed that they had performed ‘dares or challenges’ which their friends or contacts on social media had asked them to do, with 21% agreeing that if their friends insisted they perform a dare or challenge which they didn’t initially want to do, they ended up doing it anyway. Almost a quarter said they did dares and challenges so as not to feel left out of their group of friends.<sup>923</sup> A study of 30 US college students’ participation in online challenges found that the social pressure to perform challenges took two forms: either direct encouragement from peers, or doing it as a way of seeking acceptance from peers.<sup>924</sup>

- 7.8.13 These motivating factors can result in children overlooking the risks. The previously cited study of 10–14-year-olds found that 27% of those surveyed said they performed ‘dares or challenges’ that were ‘fashionable’, without thinking whether they were good or bad for them.<sup>925</sup>
- 7.8.14 The functionalities that play a role in motivating participation in dangerous stunts and challenges (for example, ‘likes’ as a signal of affirmation) may increase the risk of harm from this content. This is explored in detail in the ‘Functionalities and recommender systems’ sub-section within this section.
- 7.8.15 Several functionalities also contribute to the virality of content, thereby encouraging dangerous stunts or challenges. Virality is defined as the degree to which online content spreads easily and/or quickly across many online users.<sup>926</sup> High virality can increase risk of harm from this content in several ways. If content encouraging dangerous stunts and challenges is widely shared, it increases the likelihood that children will encounter it. In the previously cited study, almost all participants were exposed to between one and 25 social media posts about the challenge before deciding to participate in it. Some participants had seen more than 50 social media posts before attempting the challenge, which may suggest that initial reluctance to perform a challenge can be reduced by repeated exposure to social media posts about it.<sup>927</sup> If a challenge goes viral, and therefore has many participants, it could present a significant risk of harm even if it is only harmful in a minority of cases.
- 7.8.16 However, engagement with online challenge and stunt content can help children assess the dangers associated with these challenges. The evidence found that the most common

---

<sup>923</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>924</sup> Note: the study held semi-structured interviews with 30 students at several US colleges aged 18-27. Source: Abraham, J., Roth, R., Zinzow, H., Madathil, K., and Wisniewski, P., 2022. [Applying Behavioral Contagion Theory to Examining Young Adults’ Participation in Viral Social Media Challenges](#), *ACM Transactions on Social Computing*, 5:1-4. [accessed 15 April 2024].

<sup>925</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>926</sup> Ofcom, 2023. [Evaluating recommender systems in relation to the dissemination of illegal and harmful content in the UK](#).

<sup>927</sup> Abraham, J., Roth, R., Zinzow, H., Madathil, K., and Wisniewski, P., 2022. [Applying Behavioral Contagion Theory to Examining Young Adults’ Participation in Viral Social Media Challenges](#), *ACM Transactions on Social Computing*, 5:1-4. [accessed 15 April 2024].

methods used by teens to assess the risk of online challenges were to watch videos of people trying it, view comments, and speak to friends about it.<sup>928</sup>

## Presence

- 7.8.17 Encountering dangerous stunt and challenge content is common among children. Ofcom research found that one in three (30%) children aged 13-17 said they had encountered content showing dangerous stunts or online challenges over a four-week period.<sup>929</sup> A survey of 5,400 teenagers aged 13-19, living in a variety of countries including the UK, found that about one in five (17%) were aware of the existence of online challenges that they themselves deemed risky or dangerous. A further 32% felt the challenges they had seen were 'risky but safe'.<sup>930</sup>
- 7.8.18 The evidence suggests that although some children do take part in online challenges, fewer attempt challenges that are risky or dangerous. The above study among 13-19-year-olds found that 21% of them had participated in an online challenge, of whom 2% reported that they deemed the challenge to be risky or dangerous, and 0.3% considered it 'really dangerous'.<sup>931</sup> However, it is reasonable to presume a tendency for children to underestimate the level of risk associated with these challenges, which may result in an under-reporting of engagement with 'risky or dangerous' challenges. One study found that 8% of its participants aged 10-14 had performed dangerous challenges that endangered their physical or psychological wellbeing or privacy, consisting of more boys than girls (6% vs 2%).<sup>932</sup>

## Impacts

- 7.8.19 If children encounter content depicting dangerous stunts and challenges online, there is a risk that they will emulate or participate in some way in the stunt or challenge and cause themselves harm. Different challenges are associated with different risks.
- 7.8.20 Online stunts and challenges can risk loss of or threats to life. This can involve ingestion of harmful substances (see also the Harmful substances content section (Section 7.7)). There have been several examples of children losing their lives or being hospitalised having attempted online challenges. In the US, a 14-year-old girl was found to have died after ingesting a large amount of diphenhydramine while taking part in a social media challenge.<sup>933</sup> The US Food and Drug Administration (FDA) published a warning that taking higher than recommended doses of diphenhydramine can lead to serious heart problems,

---

<sup>928</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>929</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>930</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>931</sup> Note: The survey was completed by 5400 teens aged 13-19 across several countries, including the UK. Source: Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>932</sup> Note: Figures have been rounded so appear different to as in the report. Source: Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. "[Viral internet challenges scale in preadolescents: An exploratory study](#)", *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>933</sup> Benadryl (diphenhydramine) is an over-the-counter medication with potential for misuse in both suicidal and recreational purposes. Elkhazeen, A., Poulos, C., Zhang, X., Cavanaugh, J., and Cain, M., 2022. [A TikTok "Benadryl Challenge" death – A case report and review of the literature](#), *Journal of Forensic Sciences*. [accessed 15 April 2024].



seizures, coma or even death, following reports of teenagers being hospitalised or dying after reportedly participating in this challenge.<sup>934</sup>

- 7.8.21 Challenges involving hot water present another example a challenge with fatal or near-fatal impacts. This involves throwing, drinking or pouring boiling water over oneself or others. An 11-year-old boy who participated was left with third-degree burns after his friend poured boiling water on him,<sup>935</sup> while an 8-year-old girl died due to complications from a boiling-water dare.<sup>936</sup>
- 7.8.22 Some challenges involve choking. A study reports on a ‘choking game’ which led to the death of a 12-year-old girl who played the ‘game’ alone<sup>937</sup> while another refers to a 10-year-old girl who died in Italy, allegedly taking part in a choking game called the Blackout Challenge.<sup>938</sup>
- 7.8.23 Other challenges have been linked to bodily harm. For example, a popular challenge encouraged children to burn themselves by applying salt and ice to their skin for prolonged periods of time. This can leave participants with localised first- and second-degree burns, similar to the effects of frostbite.<sup>939</sup> Challenges can also include actions that risk physical harm, such as climbing tall buildings and structures, and sitting or standing on the edge of tall buildings and structures. For instance, a series of viral videos of climbers illegally scaling skyscrapers and tall structures has been viewed by millions, leading others to copy the stunts and post their exploits on internet forums.<sup>940</sup> For guidance on differentiating between dangerous stunts and challenge content harmful to children, and sports content (such as skateboarding or parkour), please see the draft Guidance on dangerous stunts and challenges content (Section 8.10).
- 7.8.24 Another example of a challenge that risks causing children psychological harm is one which exposes them to distressing or age-inappropriate content – i.e. content that may be considered a kind of content harmful to children. For example, a particularly dangerous challenge went viral around 2010-2014 that tasked children with watching horror videos and performing certain tasks to harm themselves.<sup>941</sup>
- 7.8.25 Some content relating to dangerous stunts and challenges may cause fear and distress to users who encounter content describing such challenges, even though they do not participate in them. This can include challenges which may have begun as a hoax, often to spread fear or anxiety, but by being widely publicised online become perceived credible, particularly by children. For example, a number of hoax challenges have been reported

---

<sup>934</sup> US Food and Drug Administration, 2020. [FDA warns about serious problems with high doses of the allergy medicine diphenhydramine \(Benadryl\)](#). [accessed 7 February 2024].

<sup>935</sup> Daily Mirror, 2019. [‘Hot Water Challenge’ warning after ‘boy pours boiling water on sleeping friend’](#). 30 July 2019. [accessed 15 April 2024].

<sup>936</sup> New York Times, 2017. [The ‘Hot Water Challenge’ Is Leading Kids to Badly Burn Themselves Over YouTube Videos](#). 11 August 2017. [accessed 15 April 2024].

<sup>937</sup> [Melissa K Egge Carol D Berkowitz, Carla Toms, Lakshmanan Sathyavagiswaran](#), 2010. [The choking game: a cause of unintentional strangulation](#). [accessed 15 April 2024].

<sup>938</sup> The Guardian, 2021. [Italy blocks TikTok for certain users after death of girl allegedly playing ‘choking’ game](#). 23 January 2021. [accessed 15 April 2024].

<sup>939</sup> Gallagher, Sophie, 2017. [Salt And Ice Challenge: NSPCC Supports Warning Against Latest Social Media Craze](#), Huffington Post, [accessed 7 February 2024].

<sup>940</sup> Sky News, 2014. [Skyscraper Climbers ‘Putting Others At Risk’](#). 5 April 2014. [accessed 15 April 2024].

<sup>941</sup> Deturo, Briana L., 2021. [The Virality of Horror Trends on Social Media](#), MAPC, The University of Tampa. [accessed 15 April 2024].

which propagate the falsehood that there is a bad actor directing users (usually children) to carry out a series of harmful activities which escalate, ending in the user being tasked to carry out self-harm or suicide.<sup>942</sup> Content relating to these specific suicide-related challenges is likely to be considered suicide or self-harm content (see Suicide and self-harm content section (Section 7.2)). However, these examples demonstrate how content relating to, or discussing, these challenges (even if the challenge is a hoax) may cause psychological harm to children. A report on dangerous challenges found that among all teens exposed to hoax challenges, 31% believed it had had a negative impact on them (consistent across age groups). Of these, 63% felt that the negative impact was on their mental health.<sup>943</sup>

## Evidence of risk factors on user-to-user services

---

7.8.26 We consider that the risk factors below may increase the risks of harm to children relating to dangerous stunt and challenge content. This is also summarised in the grey box at the start of this section.

### Risk factors: User base

#### User demographics

7.8.27 The following sub-section outlines the evidence of user base demographic factors and risk of harm to children, which can include listed characteristics. Services should consider the intersecting influence of demographic factors on risk, which can be contextual, complex and involve multiple factors.

7.8.28 Data suggests that user base characteristics including gender and age could lead to an increased risk of harm to children in different age groups.

#### *Gender*

7.8.29 Several studies have found that boys are more likely than girls to participate in dangerous or harmful challenges.

7.8.30 A UK study, commissioned by DCMS, reported that teenage boys (aged 13-17) were more at risk of engaging with content showing dangerous stunts and challenges. This study takes a broader approach to 'dangerous stunts and challenges' than the definition set out in the Act, including skateboarding tricks, parkour, and free running.<sup>944</sup> However, it indicates that teenage boys are less risk-averse when it comes to stunts and challenges, and so are likely to be more at risk of harm from content encouraging dangerous stunts and challenges.<sup>945</sup>

---

<sup>942</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>943</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>944</sup> For guidance on differentiating between dangerous stunts and challenge content harmful to children, and sports content (such as skateboarding or parkour), please see the draft Guidance on dangerous stunts and challenges content (Section 8.8).

<sup>945</sup> Ecorys (commissioned by the Department for Digital, Culture, Media and Sport), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 15 April 2024]. Note: DCMS stands for the UK Government department, 'Department for Digital, Culture, Media & Sport'. This has now been replaced

- 7.8.31 A study in Spain among 10-14-year-olds also found that boys in the study were more likely than girls to take part in dangerous challenges (6% vs 2%).<sup>946</sup>

#### *Age*

- 7.8.32 It is likely that some age groups will be more susceptible to the influence of encountering this type of content online given their developmental stage.
- 7.8.33 The onset of puberty (within the transition years 10-12) drives neurobiological changes that influence cognitive development and increase risk-taking and impulsive behaviour as children undergo adolescence. This continues as children enter their teenage years (13-15) when peer influence (and the desire to fit in) becomes particularly important. Risk-taking and impulsive behaviour increases and teenagers develop and assert their personalities by making choices e.g., about their interests. This can continue as children move into early adulthood (16-17). See the Recommended age groups section (Section 7.15) within this volume for more information about the sources behind this evidence.
- 7.8.34 Evidence suggests that over-13s are the group most likely to encounter dangerous stunts, although younger teenagers may be more vulnerable to taking part in them, due to having less maturity in assessing risk. A study showed that while teenage boys (aged 13-17) were most likely to be exposed to dangerous stunts, older children (aged 16-17) were generally less interested in this type of content and felt that younger children may be more 'susceptible' to online stunts and challenges, particularly those which are accessible to them and appear to be fun.<sup>947</sup>
- 7.8.35 This is also reflected in a study with 13-19-year-olds across ten countries, including the UK. The survey found that 14% of 13-15-year-olds participated in challenges online, compared with 9% of 18-19-year-olds. The study reflected that this may in part be developmental, with the younger age group having a greater need for peer approval and social validation, less developed critical thinking skills, and a greater propensity to take risks, making them more likely to participate.<sup>948</sup>
- 7.8.36 Although the available evidence generally focuses on teenagers, case studies of child deaths or serious harm often involve children under 13 (see 'Impacts' sub-section). While more evidence is needed, the prevalence of younger children in fatal or serious cases suggests they may be at risk of the most severe outcomes. Children in the younger age groups have a more limited ability to interpret information and intent, and their peers begin to become more influential which may increase their risk of participating in and being harmed by dangerous stunts and challenges.

---

by 'Department for Science, Innovation and Technology' (DSIT) and 'Department for Culture, Media and Sport' (DCMS).

<sup>946</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. "[Viral internet challenges scale in preadolescents: An exploratory study](#)", *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>947</sup> Ecorys (commissioned by the Department for Digital, Culture, Media and Sport), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 15 April 2024].

<sup>948</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

## Risk factors: Service types

7.8.37 Research suggests that children are at an increased risk of encountering stunt and challenge content on **social media services and video-sharing services** as set out below.

### Service type

#### *Social media and video-sharing services*

- 7.8.38 Evidence suggests that children are likely to encounter online challenges on social media services as well as video-sharing services. A survey of 5,400 teenagers aged between 13 and 19, in several countries (including the UK), found that 83% said they became aware of online challenges via social media. This was almost double the proportion who became aware of them from traditional media sources, such as television (43%). The survey also found that awareness of hoax challenges (discussed above) is most likely to derive from social media, with 77% of teens coming across them this way.<sup>949</sup> There are also several reports of children encountering online challenges on video-sharing services.<sup>950 951</sup>
- 7.8.39 Social media services also emerge in the evidence in cases where children are pressured by their peers to attempt dangerous stunts and challenges. A study in Spain among 10-14-year-olds found that more than a third of them (36%) said they performed ‘dares or challenges’ that their friends or contacts had asked them to do on social media.<sup>952</sup>
- 7.8.40 Fatal or severe outcomes from children participating in dangerous challenges often appear on social media and video-sharing services. For example, as reported in a case report, the viral challenge involving ingesting large quantities of diphenhydramine directed children and teens to record themselves taking large amounts of these substances and publish the results on video-sharing services.<sup>953</sup> There are other instances of online challenges are posted on video-sharing services by children and teens.<sup>954</sup>
- 7.8.41 Video-sharing services also allow users to post videos, which we note as fundamental to sharing dangerous stunt and challenge content that can be encountered by children (see ‘Posting content’ within this section).

---

<sup>949</sup> Hilton, Zoe; Praesidio Safeguarding, 2021. [Exploring effective prevention education responses to dangerous online challenges](#). [accessed 15 April 2024].

<sup>950</sup> New York Times, 2017. [The ‘Hot Water Challenge’ Is Leading Kids to Badly Burn Themselves Over YouTube Videos](#). 11 August 2017. [accessed 15 April 2024].

<sup>951</sup> The Guardian, 2021. [Italy blocks TikTok for certain users after death of girl allegedly playing 'choking' game](#). 23 January 2021. [accessed 15 April 2024].

<sup>952</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. [“Viral internet challenges scale in preadolescents: An exploratory study”](#), Current Psychology, 2022 5:1-11. [accessed 15 April 2024].

<sup>953</sup> Elkhazreen, A.; Poulos, C.; Zhang, X.; Cavanaugh, J; Cain, M., 2021. [A TikTok “Benadryl Challenge” death – A case report and review of the literature](#), Journal of Forensic Science, 68, pp. 339 – 342. [accessed 15 April 2024].

<sup>954</sup> The Independent, 2018. [Tide pod challenge: Teenagers are risking death to film themselves eating detergent](#). 12 January 2018. [accessed 7 February 2024].

## Risk factors: Functionalities and recommender systems

### User communication

#### *Posting content*

- 7.8.42 The ability to post content, which typically involves videos showing the challenge, but can manifest as images or text, is fundamental to dangerous stunt and challenge content. Short-form videos depicting online challenges are often posted on U2U and video-sharing services by children, young people and adults. These often show both the actual challenge being performed and encourage other users to participate in it.<sup>955 956</sup>
- 7.8.43 As explored in the ‘How harm manifests’ sub-section above, children are participating in stunts and challenges to get affirmation from peers and to feel included. Participating in a stunt or challenge visible to peers (through posted content) is a crucial part of this.

#### *Reacting to content, commenting on content, and re-posting or forwarding content*

- 7.8.44 Challenges and stunts make for engaging content for children, generally involving a competitive element, a shock factor and a clear call to action. This can correlate with high numbers of reactions, re-posts and comments.
- 7.8.45 Reacting to or re-posting content also provides positive user feedback that can feed into the virality of online content.<sup>957</sup> The reacting or re-posting of content depicting dangerous stunts and challenges can therefore increase the likelihood of children encountering this content.
- 7.8.46 This can also be true of comments on content. A study with 10-14-year-olds in Spain found that 58% liked to comment on the dares or challenges which other people perform, while 47% liked to be told what others thought of their dares and challenges.<sup>958</sup> This kind of user-to-user engagement, often through comments, may contribute to the social pressure and affirmation that drives some children to participate in dangerous stunts and challenges. These functionalities may therefore increase the likelihood of children participating in dangerous stunts and challenges.

### User networking

#### *User connections*

- 7.8.47 User connections increase both the risk of children encountering content encouraging dangerous stunts and challenges, and the likelihood of them participating.
- 7.8.48 Functionalities that allow users to create online networks, such as user connections, play an important role in circulating content depicting dangerous stunts and challenges. Large networks in particular are likely to increase the virality of this content. Although not in itself a dangerous challenge, the participation in, and support of, the ALS Ice Bucket

---

<sup>955</sup> Elkhaszeen, A.; Poulos, C.; Zhang, X.; Cavanaugh, J; Cain, M., 2021. [A TikTok “Benadryl Challenge” death – A case report and review of the literature](#), Journal of Forensic Science, 68, pp. 339 – 342. [accessed 15 April 2024].

<sup>956</sup> The Independent, 2018. [Tide pod challenge: Teenagers are risking death to film themselves eating detergent](#). 12 January 2018. [accessed 7 February 2024].

<sup>957</sup> Ofcom, 2023. [Evaluating recommender systems in relation to the dissemination of illegal and harmful content in the UK](#).

<sup>958</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. [“Viral internet challenges scale in preadolescents: An exploratory study”](#), Current Psychology, 2022 5:1-11. [accessed 15 April 2024].

challenge by celebrities with large followings on social media helped the challenge go viral, leading to large numbers of people both seeing and performing the challenge online.<sup>959</sup> This dynamic may also be present for stunts and challenges, with potentially harmful outcomes for children. Children also post content with intention of encouraging their connections to participate. In a study with 10-14-year-olds in Spain, 71% reported that “when I perform a dare or challenge, I like others to follow and also perform it”.<sup>960</sup> Seeing other users participate is likely to increase the social pressure to actively participate in the challenge.

- 7.8.49 Another study found that a challenge’s perceived viral reach, in terms of the number of posts which participants see, and their perception of how many others are participating in it, may reduce their initial hesitancy about performing the challenge. The study suggests that the increased presence of challenge posts on social media platforms may increase the sense that these challenges are normal, or the perception that hundreds or thousands of other people are also participating in them.<sup>961</sup>

## Content exploring

### Content tagging

- 7.8.50 Research has found that hashtags (usually # followed by the challenge name) help to spread online challenges.<sup>962</sup> Searching for challenges using hashtags enables users to see the full extent of users participating in that challenge across a service.
- 7.8.51 For example, in March 2020, a coronavirus challenge was circulating on social media which encouraged people to lick items in public, such as toilets, and post about it online. At that time, the #coronaviruschallenge hashtag had almost 100 million views on one social media platform, and nearly a year later it had had 3.1 billion views.<sup>963</sup>

## Recommender systems

### Content recommender systems

- 7.8.52 Services which deploy content recommender systems<sup>964</sup> could be at higher risk for recommending and suggesting dangerous stunt and challenge content to children. Detailed explanation on how recommender systems work and how they can pose a risk to children is set out in our Wider context for understanding risk factors section (Section 7.14).

---

<sup>959</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>960</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>961</sup> Abraham, J., Roth, R., Zinzow, H., Madathil, K., and Wisniewski, P., 2022. [Applying Behavioral Contagion Theory to Examining Young Adults’ Participation in Viral Social Media Challenges](#), *ACM Transactions on Social Computing*, 5:1-4. [accessed 15 April 2024].

<sup>962</sup> Ortega-Barón J, Machimbarrena JM, Montiel I, González-Cabrera J., 2021. “[Viral internet challenges scale in preadolescents: An exploratory study](#)”, *Current Psychology*, 2022 5:1-11. [accessed 15 April 2024].

<sup>963</sup> This may not constitute a dangerous stunt or challenge. However, we believe it illustrates dynamics that are relevant to other dangerous stunts and challenges. Newsweek, 2021. [21 Dangerous TikTok Trends Every Parent Should Be Aware of](#). 6 March 2021. [accessed 15 April 2024].

<sup>964</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

- 7.8.53 Recommender systems can serve children dangerous stunt and challenges content. Positive user feedback on challenge content (see ‘Reacting to content, commenting on content, and re-posting or forwarding content’ within this section), may result in this content being amplified by recommender systems, depending on the recommender system’s design.<sup>965</sup> This increases the risk of children encountering it, and the likelihood that they will participate in the challenge. When harmful content is repeatedly encountered by a child, this may lead the child to experience ‘cumulative harm’.<sup>966</sup>
- 7.8.54 One study in particular found that dangerous stunt and challenge content can be recommended alongside educational content, which may make children more inclined to trust the safety of the content and participate in the challenge.<sup>967</sup>

---

<sup>965</sup> Ofcom, 2023. [Evaluating recommender systems in relation to the dissemination of illegal and harmful content in the UK](#).

<sup>966</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in Section 7, the Introduction to the Children’s Register of Risks.

<sup>967</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 15 April 2024].



## 7.9 Non-designated content

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of depression, suicide, self-harm and eating disorders.**

In this section, we set out Ofcom’s interpretation of ‘non-designated content’ (NDC), and approach to identifying categories of NDC.

We propose an evidence-based, harms-led approach to identifying NDC, setting out four steps to meet the criteria within the definition. We consider what harms are arising from potential categories of NDC content online, and whether any of those harms are “significant” within the meaning of the Online Safety Act 2023 (‘the Act’). We then seek to demonstrate a material risk of harm through evidence that indicates a relationship between the significant harm identified and a specific, definable kind of content. We then consider whether the number of children affected is “appreciable”.

In our preliminary assessment, we have identified two broad kinds of content that could potentially meet the definition of NDC. Evidence suggests that ‘body image content’ may be linked to significant harm arising from body or image dissatisfaction. These include low self-esteem, poor mental health, and behaviours that could be harmful to children, such as extreme dieting and exercise, or adult cosmetic products or procedures. ‘Depressive content’ may also be linked to significant harm, namely lasting emotional impacts, including exacerbation of mental health issues such as depression, anxiety, self-harm and suicidal ideation.

However, for both potential categories of content, we consider that further evidence is required that indicates the relationship between specific kinds of content, and the material risk of significant harm, and to define the categories of content more clearly.

### Consultation Questions (specifically for NDC)

Do you have any views on our interpretation of non-designated content or our approach to identifying non-designated content? Please provide evidence to support your answer.

Do you have any specific evidence relevant to our assessment of body image content and depressive content as kinds of non-designated content? Specifically, we are interested in: (i) specific examples of body image or depressive content linked to significant harms to children, (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.

Do you propose any other category of content that could meet the definition of NDC under the Act at this stage? Please provide evidence to support your answer.

## Ofcom’s approach

- 7.9.1 There are several kinds of content that present a risk of harm to children online. The kinds of content specified as Primary Priority Content (‘PPC’) or Priority Content (‘PC’) are explored in dedicated sections in this volume.<sup>968</sup>

<sup>968</sup> These are set out in the Introduction to the Register, Section 7.

- 7.9.2 However, the categories of harmful content are not static. Online services, and the way users engage with them, are continually changing, leading to the emergence of new risks to children. The category of ‘non-designated content that is harmful to children’ (which we refer to in this section as ‘non-designated content’ or ‘NDC’) ensures that services consider kinds of harmful content, beyond what is specified by the Act, when assessing risk of harm to children on their service.
- 7.9.3 The Act defines non-designated content as content, not within Primary Priority or Priority content, of a kind which “presents a material risk of significant harm to an appreciable number of children in the United Kingdom”.<sup>969</sup>
- 7.9.4 The Act specifies some exclusions for non-designated content. Content is not to be regarded as non-designated content that is harmful to children if the risk of harm flows from:
- a) the content’s potential financial impact;
  - b) the safety or quality of goods featured in the content; or
  - c) the way in which a service featured in the content may be performed (for example, in the case of the performance of a service by a person not qualified to perform it).<sup>970</sup>
- 7.9.5 The Act does not set out how to identify non-designated content, nor how the terms that form this definition should be interpreted. In this section we have set out a provisional view on:
- a) our interpretation of the terms that form the basis of the definition (see sub-section ‘Key terms’ below);
  - b) an appropriate framework to ascertain whether certain kinds of content meet the definition of non-designated content (see sub-section ‘Key considerations’ below); and
  - c) two kinds of content, body image content and depressive content, that may potentially meet the definition of NDC, including some areas where we may need further evidence (see sub-section ‘Potential categories of non-designated content’ below).
- 7.9.6 Our preliminary assessment is that categories we identify as **body image content** and **depressive content** could meet the definition of NDC, subject to further evidence on defining these kinds of content and identifying a link to significant harm. We have set out our assessment of how these kinds of content meet the criteria of the framework below, in the form of worked examples. Further, we have explained why we are not yet able to conclude that they meet the definition of NDC, and the additional evidence that we would need to be able to reach that conclusion.
- 7.9.7 We invite responses to the consultations to provide evidence relating to these two potential categories of NDC. We are also seeking additional evidence through our wider research and engagement programme. If we are in a position to identify specific categories of NDC in our final statement, we will incorporate those kinds of content in our Children’s Register of Risks.<sup>971</sup> Regardless of whether we are able to confirm any categories of NDC in time for our final statement, we expect to revisit potential categories

---

<sup>969</sup> As set out in Section 60(2)(c) of the Online Safety Act 2023 (the ‘Act’).

<sup>970</sup> Section 60(3) of the Act.

<sup>971</sup> If we confirm any kinds of content as NDC in our final statement, these kinds of content would be brought into scope of our Recommender systems measure RS2, which we discuss in Section 19.

of NDC in subsequent iterations of the Children’s Register of Risk, as our evidence base grows or new kinds of harm emerge.

- 7.9.8 It should be noted that, aside from being considered categories of NDC, body image content and depressive content may already be considered in the context of cumulative harm. Evidence suggests that when encountered in combination with suicide and self-harm content or eating disorder content, these kinds of content may increase the risk of harm from these kinds of Primary Priority Content.<sup>972</sup> For example, depressive content can be encountered alongside content promoting suicide and self-injury content, sometimes in high volumes.<sup>973</sup> The coroner’s report following the death of 14-year-old Molly Russell by suicide linked Molly’s death to ‘binge periods’ of content “concerned with self-harm, suicide or that were otherwise negative or depressing in nature”.<sup>974</sup> Similarly, while the evidence is limited, encountering body image content alongside content promoting eating disorders is also likely to increase the risk of harm.<sup>975</sup> Body image content and depressive content may therefore be already considered as potentially causing cumulative harm from eating disorder content or suicide and self-harm content. In this section, we focus instead on evidence as assess whether these kinds of content also meet criteria to be identified as NDC (i.e. a distinct kind of harmful content).

## Key terms

---

- 7.9.9 We set out below how we use some key terms, based on relevant definitions in the Act and our own interpretation.

---

<sup>972</sup> This is an example of cumulative harm. Cumulative harm arises when harmful content (PPC, PC or NDC) is repeatedly encountered by a child or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a kind of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC.

<sup>973</sup> The Molly Rose Foundation found that as of October 2023, 49% of the most-engaged-with posts on TikTok either used suicide and self-harm hashtags, contained material that promoted or glorified suicide and self-harm, referenced suicide ideation, or otherwise contained intense themes of misery, hopelessness or depression. In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as 15-year-olds. Content was identified and scraped using hashtags that had been frequently used to post suicide and self-harm-related material. While this is a single study and may not represent all children’s experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest](#). [accessed 18 April 2024]. Subsequent references to this report throughout.

<sup>974</sup> “The way that the platforms operated meant that Molly had access to images, video clips and text concerning or concerned with self-harm, suicide or that were **otherwise negative or depressing in nature**. The platform operated in such a way using algorithms as to result, in some circumstances, of binge periods of images, video clips and text some of which were selected and provided without Molly requesting them. These binge periods, if involving this content, are likely to have had a negative effect on Molly” (emphasis added). Source: North London Coroner’s Service, 2022. [Molly Russell - Prevention of future deaths report](#). [accessed 18 April 2024]. Subsequent references to this source throughout.

<sup>975</sup> In a study by eating disorder charity Beat, participants described how online advertising around weight loss fuelled their eating disorder or disordered eating behaviours. As one participant described, it’s “*not the root cause, but cheers (my) eating disorder on*”. Should users encounter weight loss advertising alongside eating disorder content, this is likely to have a cumulative impact in exacerbating disordered eating behaviours. Source: Beat, 2021. [Online advertising and eating disorders](#). [accessed 2 February 2024].

- 7.9.10 **‘Harm’** means physical or psychological harm.<sup>976</sup>
- 7.9.11 The Act provides that harm can occur from isolated incidents of exposure or from cumulative exposure. Cumulative harm arises in the following circumstances:
- a) When harmful content (PPC, PC or NDC) is repeatedly encountered by a child;
  - b) Where a child encounters harmful combinations of content. These combinations of content include encountering different kinds of harmful content (PPC, PC or NDC), or a kind of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC.<sup>977</sup>
- 7.9.12 ‘Harm’ can include instances of indirect harm, in which a group or individual are harmed, or the likelihood of harm is increased, as a consequence of a child seeing harmful content, which then affects their behaviour towards other children.<sup>978</sup>
- 7.9.13 **‘Significant harm’** is not defined in the Act, although in relation to children’s access assessments it says that ‘a significant number’ refers to a number which is significant in proportion to the total number of United Kingdom users of a service or (as the case may be) a part of a service.<sup>979</sup> We interpret ‘significant harm’ to mean harm (as described above) that causes lasting or severe impacts on children’s wellbeing, attitudes or behaviour, or attitudes or behaviours likely to cause harm to others. Transient impacts (such as short-term emotional reactions) are less likely to be significant, although the cumulative effect of impacts should be considered in assessing the significance of harm.
- 7.9.14 **‘Material risk’** is not defined in the Act. We interpret ‘material risk’ to mean the likelihood of harm occurring. This can be assessed through linking ‘significant harm’ to a specific kind of content.
- 7.9.15 **‘Appreciable number of children’** is defined further in the Act’s explanatory notes, which state that content “need not adversely affect a very large number of children” to be classified as harmful content. However, content which may adversely affect “only one child or very few children” should not be defined as ‘content harmful to children’.<sup>980</sup>

## Key considerations

---

- 7.9.16 We have developed an analytical framework to help us to identify NDC through consideration of the following criteria:
- a) What harms are arising from children viewing online content?
  - b) Is the harm identified significant?
  - c) Is there a material risk of that harm occurring?
  - d) Are an ‘appreciable’ number of children in the UK affected?

---

<sup>976</sup> Section 234(2) of the Act.

<sup>977</sup> Section 234(4) of the Act.

<sup>978</sup> Section 234(5) of the Act.

<sup>979</sup> Section 35(4) of the Act.

<sup>980</sup> The Explanatory Notes for the Act explain: “a material risk of significant harm to an appreciable number of children in the United Kingdom” means that content need not adversely affect a very large number of children to be classified as harmful to children, but content which may adversely affect only one child or very few children will not be caught by the definition of “content that is harmful to children” Source: UK Parliament, Notes. 2023. [Explanatory Notes, Online Safety Act 2023](#). [accessed 18 April 2024].

7.9.17 Applying the four steps of this framework will enable us to reach a view on whether a particular kind of content falls within the definition of NDC. If it does, we will include it in our risk assessment.

## Step 1: What harms are arising from children viewing online content?

7.9.18 As a starting point, we consider what physical or psychological harms are arising, or could arise, from content online.

7.9.19 Studies on children's experiences online enable children to report having experienced physical or psychological harm. For example, Ofcom research found that children experience a range of harmful outcomes from viewing online content. These are broadly categorised as:

- a) transient emotional impacts (such as shock, confusion or fear);
- b) shorter-term behavioural changes or more severe emotional impacts (such as disengaging from education, limited/short-term food restriction or dieting, feelings of worry or anxiety); and
- c) long-term harmful behavioural changes or serious emotional or physical impacts (such as evidence of harm to self-esteem/body image, negative impact to sexual development, social withdrawal/isolation).

7.9.20 Once a harm is identified that appears to be linked to a particular kind of content, further steps are required to establish the significance of the harm, and the strength of the relationship between content and harm.<sup>981</sup>

## Step 2: Is the harm identified significant?

7.9.21 We then consider whether the harm identified is significant. In assessing significance, we consider both cumulative, indirect, and long-term impacts.

7.9.22 We consider that harm is likely to be significant when it negatively impacts a child's attitudes or behaviour in terms of psychological impact, or contributes to more severe emotional and physical outcomes. Some of these harms manifest as threatening the physical safety and even the life of a child. Isolated incidents can cause significant harm; for example, a child may attempt a dangerous stunt following a single encounter with content promoting that action. However, significant harms are more likely to occur cumulatively, from encountering high volumes or harmful combinations of content. Indeed, Ofcom research found that high volumes of harmful content can lead to significant outcomes such as deep and/or long-lasting damage to self-esteem or self-image, worsening of pre-existing mental health problems, development of eating disorders, and effects on sexual development.<sup>982</sup>

7.9.23 Harm is less likely to be significant if it is transient and has relatively minor consequences. Ofcom research finds that these experiences often result from an isolated encounter with harmful content or contact which caused short-term reactions such as shock or

---

<sup>981</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>982</sup> For example, a 16 year-old reflected on how engaging with content promoting eating disorders between the age of 11 and 14 encouraged and prolonged her own eating disorder. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online](#). Subsequent references to this report throughout.

confusion.<sup>983</sup> However, repeated shock or confusion may cumulatively contribute to a more significant outcome.

- 7.9.24 To understand the significance of harm, we also consider physical and psychological ‘indirect’ harm to peers, families and communities. The development of harmful behaviours or attitudes, such as hatred towards a particular group that may encourage abuse or violence towards that group, is therefore likely to be significant. The significance of impacts can also manifest years after encountering harmful content.<sup>984</sup>

### Step 3: What is the material risk of that harm occurring?

- 7.9.25 To understand the material risk of harm occurring, some evidence is required to indicate a relationship between significant harm and a specific kind of content present on services. This step helps to effectively define and scope the category of NDC.
- 7.9.26 Evidence establishing a relationship between types of content and specific outcomes is rare. There are often many factors which contribute to a child’s physical or psychological state. However, research with children, parents and carers, and specialists can provide insight into the relationship between specific types of content and harmful outcomes. For example, DCMS formulated working definitions of online hazards (types of harmful content or contact) through workshops with stakeholders, before discussing the experiences and impacts of these hazards with children, parents, carers, and professionals. This enabled researchers to link types of harmful content to specific outcomes.<sup>985</sup>
- 7.9.27 As discussed at Step 2, harm may be significant when it is cumulative (if children repeatedly encounter a kind of content). Significant harm may therefore be related to a specific kind of content when encountered at high volumes.
- 7.9.28 Having identified a specific harm linked to a particular content type or types, we will check (a) that the content is distinct from other Primary Priority or Priority Content, and (b) that the harms are not already excluded by the Act from the scope (see exclusions at 1.4 above).

### Step 4: Are an appreciable number of children affected?

- 7.9.29 Finally, we consider whether an appreciable number of children in the UK are affected by the significant harm identified. The Act does not set, and we do not propose, a numerical threshold for ‘appreciable’, but we take into consideration several factors to assess the number of children facing ‘material risk of significant harm’ for a type of content that may be NDC.

---

<sup>983</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>984</sup> For example, in Ofcom research, children report the long-term effects of cyberflashing. A 16-year-old reported how receiving unsolicited sexual images as a 13-year old had, over time, affected her relationship with men and how she behaves online. While cyberflashing is an illegal harm, this example demonstrates the potential for impacts to manifest over time. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>985</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children.](#) [accessed 18 April 2024]. Subsequent references to this report throughout. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

- 7.9.30 Once a kind of NDC is identified, we can consider the proportion of children encountering this kind of content. For example, Ofcom’s Online Experiences Tracker provides detail on the number of children aged 13-17 who report encountering different categories of content over a four-week period.<sup>986</sup> This study proved useful in understanding the presence of designated kinds of harmful content,<sup>987</sup> and pending roll out of our proposed Children’s Online Safety Tracker, could similarly be used for NDC for this age group. For example, in 2023 children (13-17) reported encountering several types of potentially harmful content online, including ‘hateful, offensive or discriminatory content’ (21%) or ‘content showing dangerous stunts and online challenges’ (30%).<sup>988</sup> An appreciable number of children are therefore at risk of encountering these content types, although further evidence may be necessary to identify the proportion of children who face ‘significant harm’ from these encounters.
- 7.9.31 We also consider the proportion of children with vulnerabilities who may be at risk of significant harm from this kind of content. For example, mental health conditions can increase the risk of significant harm from certain kinds of harmful content. Children with mental health conditions make up a sizeable proportion of children overall. Recent statistics from the NHS suggest that that one in five children (20%) aged 8-16 had a probable mental health disorder in the UK in 2023.<sup>989</sup> This indicates that NDC disproportionately affects children with mental health conditions if they encounter this content. Similarly, evidence suggests that LGBTQ+ children are at higher risk of content that is abusive, content that incites hatred or bullying content.<sup>990</sup> Evidence suggests that significant numbers of young people are LGBTQ+.<sup>991</sup> If a kind of NDC presented a risk of significant harm to LGBTQ+ people, an ‘appreciable’ number of children would probably be at risk of significant harm from this kind of content.
- 7.9.32 Provided the above four stages are met, we would consider the kind of content identified to meet the definition of NDC and would classify it as such.

---

<sup>986</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>987</sup> This evidence related to Priority Content: abuse and hate content and dangerous stunts and challenges content. We discuss abuse and hate content in Section 7.2.

<sup>988</sup> Potential harm refers to Primary Priority and Priority Content (PPC/PC) as noted in the [Wave 4 Technical Report](#). Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>989</sup> NHS England, 2023. [Mental Health of Children and Young People in England, 2023 – wave 4 follow-up to the 2017 survey](#). [accessed 18 April 2024]. Subsequent references to this source throughout.

<sup>990</sup> Refer to the Abuse and hate section, Section 7.4 in this volume.

<sup>991</sup> Around 7 in 10 16-26 year-olds identify as heterosexual, with only half exclusively heterosexual when asked about who they are attracted to. Source: Stonewall, 2022. [Rainbow Britain Report \(2022\)](#). [accessed 18 April 2024].



## Potential categories of non-designated content

---

7.9.33 Using the above framework, we have identified two potential kinds of NDC. We explain these potential categories in further detail below; identifying which considerations they meet, based on the above framework, and highlighting where further evidence is required.

### Body image content

7.9.34 ‘Body image content’ meets many of the criteria in the framework. Our preliminary assessment is that:

- a) There is evidence of harm from online content: children experience body dissatisfaction from the content they encounter.
- b) There is some evidence that these harms are likely to be significant, such as harm to children’s self-esteem, wider wellbeing and influencing extreme dieting and exercise behaviours.
- c) However, ‘body image content’ is a wide category of content, potentially encompassing all diet and fitness content. We need further evidence indicating a relationship between specific kinds of content and significant harm, and therefore establish a ‘material risk’. We invite stakeholder evidence on this specifically, to assist in defining the scope of content that could be classed as NDC.
- d) The affected group may be appreciable, since there is evidence that significant numbers of children may be experiencing body dissatisfaction as a result of online content. However, assessing the number of children affected (for example, by measuring the proportion of children encountering this content) first requires a clear understanding of this category of NDC (Step 3).

7.9.35 Below we summarise the relevant evidence and provide detailed analysis to inform this assessment.

#### Step 1: Harm caused by body image content

7.9.36 Evidence suggests that children are encountering content online which is contributing to psychological harms such as poor self-esteem or negative self-image. For example, the Mental Health Foundation found that 40% of teenagers in Great Britain said images on social media caused them to worry about their body image<sup>992</sup> while Barnardo’s found that 87% of UK 11-25-year-olds thought that the internet and social media created at least some pressure for them to look a certain way, with 35% saying it created a lot of pressure; 68% reported having been made to feel bad about how they look because of things they had seen online.<sup>993</sup> A systematic literature review based on 67 studies found evidence that the use of the internet, and particularly appearance-focused social media, is associated with heightened body image and eating concerns. Developmental characteristics may make adolescents particularly vulnerable to these effects.<sup>994</sup>

---

<sup>992</sup> Mental Health Foundation, 2019. [Body image report – Executive Summary](#). [accessed 5 April 2024].

<sup>993</sup> Barnardo’s (Woodworth, A.), 2023. [Your Voice Matters 2022](#). [accessed 5 April 2024]. See also: [Ofcom, 2024. Child development ages, stages and online behaviour](#).

<sup>994</sup> Among the 67 identified studies in this literature review, 52 collected data with study sample sizes ranging from 17 to 2036 participants. Source: Rodgers, RF. and Melioli, T., 2015. [The Relationship Between Body Image Concerns, Eating Disorders and Internet Use, Part I: A Review of Empirical Support](#). [accessed 18 April 2024].

- 7.9.37 The evidence suggests that this harm is experienced by both girls and boys. Body image concerns have often been associated mainly with girls; in an online survey conducted by the UK Safer Internet Centre with 8-17-year-olds, both boys and girls said they worried about how attractive they looked when they shared photos online, but a higher proportion of girls had these concerns (35% for boys vs 51% for girls).<sup>995</sup> However, there are also reports of boys experiencing body dysmorphia relating to how muscular their bodies are. According to doctors and researchers cited in a recent US news article, the “*relentless online adulation of muscular male bodies can have a toxic effect on the self-esteem of young men*”, making them feel inadequate and anxious.<sup>996</sup> Another US study found that a third (29.5%) of boys aged 11-18 who participated were dissatisfied with their body shape, with the majority of these expressing interest in building muscle.<sup>997</sup> Although the analysis is from the US, this experience is likely to be also affecting boys in the UK.
- 7.9.38 The above evidence indicates that the experience of being online can cause body dissatisfaction in children. However, the specific kind of content driving this harm is rarely (or sometimes too broadly) defined. For example, DCMS (now DSIT) describes body image content as “content that promotes or could give rise to unhealthy or negative body image and associated behaviours”<sup>998</sup> – a definition potentially encompassing a wide range of content. This has implications for assessing material risk (Step 3). The significance of body dissatisfaction as a harm is first assessed below.

## Step 2: The significance of harm caused by body image content

- 7.9.39 There is evidence to suggest that the harms caused by viewing content relating to body image may be considered significant, primarily when encountered in high volumes. The cumulative effect of body dissatisfaction has been related to psychological harms such as low self-esteem and poor mental health, as well as encouraging behaviours that could be harmful to children, such as extreme dieting, exercise or surgeries.
- 7.9.40 Body dissatisfaction has been linked to mental health conditions such as depression, and to the development of eating disorders. While several factors may influence feelings of body dissatisfaction, some evidence suggests that there is an association between such feelings and social media use, in particular encountering body image content online. One study of 10,904 14-year-olds reported that a longer period of time spent on social media overall was related to feelings of body weight dissatisfaction (those who reported using social media for at least 5 hours a day on average were 31% more likely to report being dissatisfied with their body than those using it for 1-3 hours a day), which in turn linked to depressive symptom scores directly (15% higher depressive symptom scores) and

---

<sup>995</sup> UK Safer Internet Centre, 2017. [Power of Image report](#). [accessed 5 April 2024].

<sup>996</sup> A report in the New York Times highlighted ‘bigorexia’, where a social media diet of perfect bodies is spurring some boys to form muscle dysmorphia. Source: Hawgood, A., 2023. [What is Bigorexia?](#) New York Times, 22 June. [accessed 8 April 2024].

<sup>997</sup> Note: Of those who were dissatisfied with their body shape, the study found that 64% of these wanted to “increase muscle;” in particular, comments involved “building chest, arms, and abs.” Source: Skemp, K., Elwood, R. and Reineke, D., 2019. [View of Adolescent Boys are at Risk for Body Image Dissatisfaction and Muscle Dysmorphia](#). [accessed 18 April 2024].

<sup>998</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#).

indirectly via self-esteem.<sup>999</sup> A Select Committee report into the impact of body image on mental and physical health<sup>1000</sup> presented evidence that body image content<sup>1001</sup> negatively affected children’s mental health and wellbeing, showing that rising body dissatisfaction is contributing to poorer mental health in young people,<sup>1002</sup> particularly (but not only) girls.<sup>1003</sup> The Select Committee evidence from Young Minds also demonstrated the impact of poor body image on how young people think about their bodies in daily life, such as being reluctant to engage in exercise, participate in school, or visit a GP, and how poor body image can result in a tendency to engage in behaviours such as problematic consumption of drugs and alcohol – all of which can, for some young people, “result in a reduced quality of psychological wellbeing and curtailed academic aspirations”.<sup>1004</sup>

- 7.9.41 Other evidence suggests that children may be influenced by online content to seek out cosmetic products or procedures that are unsuitable for children and may be physically harmful. A Girlguiding report indicated that 23% of 11-21-year-olds had considered having a cosmetic procedure after seeing a celebrity or influencer having it online.<sup>1005</sup> Recent media reports have highlighted a rise in pre-teen girls using adult, anti-ageing skincare products that they have seen promoted on social media and video-sharing services. According to dermatologists, these products may be harmful to children’s sensitive skin.<sup>1006</sup> Again, these products and procedures may not be harmful in all cases, but are likely to be unsuitable for children, or may be harmful if not administered by a professional. This content may also constitute content promoting harmful substances. Refer to section 7.7 for more detail.
- 7.9.42 Understanding the significance of harm requires looking at the context in which body image is encountered. If body image content is encountered in high volumes, it could increase the risk of severe emotional outcomes and the adoption of harmful behaviours. In an Ofcom ethnographic study, one participant (aged 17) mentioned how he developed an interest in the gym and body building during the Covid lockdowns. Over time the content on his social media feeds had shifted from funny memes and car content to gym-

---

<sup>999</sup> The study assessed the association between social media use and depressive symptoms and investigated multiple potential explanatory pathways via online harassment, sleep, self-esteem and body image. It used population based data from the UK Millennium Cohort Study. Multivariate regression and path models were used to examine associations between social media use and depressive symptoms. Source: Kelly, Y., Zilanawala, A., Booker, A. and Sacker, A., 2019. [Social Media Use and Adolescent Mental Health: Findings From the UK Millennium Cohort Study](#). [accessed 23 April 2024].

<sup>1000</sup> House of Commons, 2022. [The impact of body image on mental and physical health](#). [accessed 5 April 2024].

<sup>1001</sup> In defining body image, it cited the Mental Health Foundation, which describes body image as “how we think and feel about our bodies”. Source: Mental Health Foundation, 2019. [Body Image – How we think and feel about our bodies](#). [accessed 23 April 2024]; In terms of linking body image to online content, it refers to online content that promotes an idealised, often doctored and unrealistic, body image. Source: Mental Health Foundation, 2022. [IBI0046 Written evidence to Health and Social Care Select Committee](#). [accessed 5 April 2024].

<sup>1002</sup> CLOSER, 2022. [IBI0043 Written evidence to the Health and Social Care Select Committee](#). [accessed 5 April 2024].

<sup>1003</sup> Girlguiding, 2022. [IBI0013 Written evidence to the Health and Social Care Select Committee](#). [accessed 5 April 2024].

<sup>1004</sup> YoungMinds, 2022. [IBI0012 Written evidence to the Health and Social Care Select Committee](#). [accessed 5 April 2024].

<sup>1005</sup> Girlguiding, 2023. [Girls’ Attitude Survey 2023](#).

<sup>1006</sup> Skopeliti, C., 2024. [‘It’s disturbing’: The rise of UK children wanting anti-ageing products](#). The Guardian, 25 January. [accessed 11 April 2024].

focused content, most of which was images of very muscled and extreme body shapes.<sup>1007</sup> Content relating to body image similarly dominated one 15-year-old participant's feed. She was primarily interested in fitness content because of her sporting goal of becoming a professional athlete, but found that a lot of the content she saw related more to modelling and weight loss as opposed to athletic performance: "It's like just models and bikinis with small waists and stuff".<sup>1008</sup>

- 7.9.43 The design of recommender systems may therefore be increasing the risk of significant harm, by presenting children with feeds dominated by body-image-related content, likely to fuel body dissatisfaction.

### Step 3: The material risk of harm occurring

- 7.9.44 We understand 'material risk' to be present when evidence indicates a relationship between a specific kind of content and a significant harm. Currently, evidence in this area is limited.
- 7.9.45 As discussed at Step 1, research in this area, where available, generally defines body image content in broad terms. This makes identifying relationships between harm and specific kinds of content difficult. Many examples of content in the broad category of 'body image content' may not be harmful, and there is a risk in identifying certain body types, diet or exercise behaviours as potentially harmful.
- 7.9.46 Further evidence is required to also determine the context in which significant harm arises. For example, evidence may demonstrate whether significant harm is most likely to arise when content is encountered in large volumes (e.g., via recommended systems), and/or smaller volumes. Evidence might also identify whether significant harm generally arises particularly when combined with other forms of harmful content, or from this kind of content only.
- 7.9.47 More evidence is also required to clarify the difference between designated kinds of harmful content (PPC or PC), and body image content. For example, some body image content may be promoting the kind of extreme dieting that might be considered as encouraging, promoting or providing instructions for behaviours associated with an eating disorder – a kind of PPC content. Further detail on eating disorder content (including examples of what Ofcom considers to be, or not to be, eating disorder content), can be found in our draft Guidance on Content Harmful to Children in Section 8.5.
- 7.9.48 Further evidence is therefore required to indicate a relationship between significant harm from body dissatisfaction, and a definable kind of content, distinct from pornographic or eating disorder content.

### Step 4: An appreciable number of children affected

- 7.9.49 The affected group may be appreciable, since evidence suggests that significant numbers of children are experiencing body image issues deriving from online content. However, assessing the number of children affected (for example, by measuring the proportion of children encountering this content) first requires a clear understanding of the category of NDC (Step 3). Once this harmful category of body image content is identified, further evidence can be sought to scope the affected group. For example, we might consider the proportion of children who report encountering this kind of content or the proportion of

---

<sup>1007</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>1008</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

children with vulnerabilities that increase the risk of significant harm (such as pre-existing mental health concerns or disordered eating behaviours).

#### Additional evidence required:

We consider that body image content may be linked to significant harm arising from body or image dissatisfaction. These include low self-esteem, poor mental health, and behaviours that could be harmful to children, such as extreme dieting and exercise, or adult cosmetic products or procedures. As indicated in our consultation questions, we invite further evidence from stakeholders on:

- (a) specific examples of body image content linked to significant harms to children,
- (b) evidence distinguishing body image content from PC or PPC.

## Depressive content

7.9.50 We think there may be a category of ‘depressive content’ that meets many of the criteria in the framework. We use ‘depressive’ to identify a category of mental health related content that is at risk of exacerbating poor mental health in children. Our preliminary assessment is that:

- a) There is evidence to suggest that content relating to experiences of poor mental health can worsen the psychological state of children watching it, contributing to mental conditions such as depression and anxiety.
- b) There is evidence to suggest that these harms are significant in how they affect children’s mental health, particularly for children already struggling with their mental health. Encountering high volumes of this content has been implicated in cases of self-harm and suicide.
- c) However, further evidence is needed to define the kind of content causing these significant harms. Broadly scoped categories of ‘mental health’ or ‘depressive’ content make it challenging to establish a material risk for specific kinds of content.
- d) There is some evidence to suggest that an appreciable number of children may be affected by this kind of content. However, assessing the number of children affected (for example by measuring the proportion of children encountering this content) first requires a clear understanding of the category of NDC (Step 3).

7.9.51 Below we summarise the relevant evidence and provide detailed analysis to inform this assessment.

### Step 1: Harm caused by depressive content

7.9.52 There is a broad range of content online relating to mental health. Children can go online for support in coping with worrying or confusing feelings, accessing information and advice on mental health, and realising that others are having similar experiences.

7.9.53 However, several organisations identify a category of content relating to mental health that they see as potentially harmful. The Molly Rose Foundation has identified how some of this content contains intense themes of misery, hopeless and depression. This is distinct from content referencing suicide and self-harm.<sup>1009</sup> Research by Amnesty International similarly identified a category of content that normalised and romanticised

---

<sup>1009</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive](#).

‘depressive thinking’, as distinct from content normalising and romanticising suicide and self-harm ideation.<sup>1010</sup> The NSPCC reports on its website that some content can promote harmful messaging about mental health conditions.<sup>1011</sup> These include in-depth stories and sharing of content linked to anxiety and depression, and online communities sharing messages of hopelessness and despair.

- 7.9.54 While this content may not be harmful when encountered in isolation, encountering high volumes of depressive content may be linked to psychological harm, contributing to low mood and potentially exacerbating mental health concerns such as depression and anxiety, particularly among child users already struggling with these issues.<sup>1012</sup>
- 7.9.55 Several studies report children being emotionally affected by depressive content and seeking to avoid it. In Ofcom research, a 17-year-old girl with experience of mental health issues reported how she experienced low mood when served content relating to mental health on her social media feeds: “I normally skip past them... I don’t need other people’s depressing-ness to make me depressed”, while a 13-year-old with experience of anxiety explained how “sometimes there are these posts with quotes and stuff about anxiety and depression [on her feed]... I don’t know... I don’t really want to see that”.<sup>1013</sup>
- 7.9.56 Harm appears to be driven by encountering high volumes of depressive content. In a recent study by Internet Matters, girls reported finding themselves in a cycle where they got stuck watching ‘sad content’, which intensified their negative emotions. Parents reported being aware of this, and attributing their daughters’ negative emotions to watching high volumes of sad content.<sup>1014</sup> Again, girls described attempting to avoid sad videos as a coping mechanism, understanding that watching this content would probably lead to more content of a similar nature being recommended to them.<sup>1015</sup>
- 7.9.57 Further evidence on psychological harm is set out below, to support our assessment of the significance of harm caused by depressive content.

## Step 2: The significance of these harms

- 7.9.58 There is evidence to suggest that the psychological harm caused by viewing depressive content may be considered significant enough to cause lasting or severe impacts on children’s wellbeing, such as exacerbating anxiety and depression that can, in some cases, lead to fatal outcomes.
- 7.9.59 Evidence shows that encountering high volumes of this content may not only make children temporarily ‘sad’ but exacerbate mental health issues. A report by the Molly Rose Foundation provides examples of teenagers observing the relationship between being recommended suicide, self-harm and intense depressive content, and deterioration

---

<sup>1010</sup> Research for this report focused on TikTok use by children and young people aged 14-24 in Kenya and the Philippines, as well as setting up user accounts to represent 13-year-olds from the US, Philippines and Kenya. Source: Amnesty International, 2023. [Driven into Darkness: How TikTok’s ‘For You’ Feed Encourages Self-Harm and Suicidal Ideation](#). [accessed 5 April 2024]. Subsequent references to this report throughout.

<sup>1011</sup> NSPCC, 2024. [Content promoting self-harm, suicide and eating disorders](#). [accessed 5 April 2024].

<sup>1012</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive](#).

<sup>1013</sup> Ofcom, 2023. [Children’s Media Lives](#).

<sup>1014</sup> The research involved in-depth interviews with teenage girls and their parents to gain further insights into the extent of the challenges that girls face when using technology. Source: Internet Matters, 2024. [“So standard it’s not noteworthy” – Teen girls’ experiences of harm online](#). [accessed 22 April 2024]. Subsequent references to report throughout.

<sup>1015</sup> Internet Matters, 2024. [“So standard it’s not noteworthy” – Teen girls’ experiences of harm online](#).



in their own mental health. One teenager remarked on the type of content he was being recommended by stating: “guess I’m not good in my head again”, while another expressed frustration at being recommended mental-health-related content, replying to a post with: “why does it show me so much of this when it’s making me ill?”.<sup>1016</sup> These comments are in response to content that may include references to suicide and self-harm alongside depressive content, but are indicative of the potential for significant impacts.

- 7.9.60 Depressive content is implicated in a case of child suicide. The coroner’s report following the death of 14-year-old Molly Russell by suicide linked Molly’s death to “images, video clips and text concerning or concerned with self-harm, suicide or that were *otherwise negative or depressing in nature*” [emphasis added]. The report highlighted how being recommended this content by recommender systems led to ‘binge periods’ that “are likely to have had a negative effect on Molly”.<sup>1017</sup> While again not isolating ‘negative or depressing’ content from suicide and self-harm content, the role of depressive content in this case indicates the potential for significant harm to children.
- 7.9.61 Across the available evidence, significant harm is consistently linked to children encountering high volumes of depressive content. Research by the Molly Rose Foundation reported that, as of October 2023, a large volume of disturbing and highly depressive material is accessible and discoverable by child accounts, with harmful content being algorithmically recommended (including through recommended search terms), and users being able to save and view it on demand, including in large volumes and through potential ‘binge-watching’.<sup>1018</sup> Research by Amnesty International shows that accounts signalling an interest in mental-health-related content were recommended increasing volumes of potentially harmful content. At its peak, 40-55% of all content served to US-based accounts signalling depressive behaviour or broad mental health interest was related to mental health. Three in five of these videos were manually identified as being potentially harmful.<sup>1019</sup> Significant harm is therefore particularly likely in the presence of recommender systems serving children high volumes of depressive content.

### Step 3: The material risk of harm occurring

- 7.9.62 Further evidence is required that indicates a relationship between depressive content and significant harm. Several studies explore depressive content alongside content promoting suicide and self-harm (a kind of PPC), making it challenging to define depressive content as a standalone category. The Molly Rose Foundation report identifies a category of content as containing “intense themes of misery, hopelessness and depression” and provides some examples, but provides limited evidence exploring the relationship between these kinds of content (as distinct from suicide and self-harm content) and significant harm.
- 7.9.63 Amnesty International has developed a categorisation framework for identifying mental health content as harmful. This was developed by researchers through qualitative research with children and young people, and feedback from interviews with mental

---

<sup>1016</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive.](#)

<sup>1017</sup> North London Coroner’s Service, 2022. [Molly Russell - Prevention of future deaths report.](#)

<sup>1018</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive.](#)

<sup>1019</sup> Amnesty International, 2023. [Driven into Darkness.](#)



health experts. A list of kinds of mental health content is reported as having “potential harmful effects when amplified at scale”. These include:

- a) “lived experience posts, speaking about anxiety, depression and self-harm (without romanticising it);
- b) posts showing people in emotional distress;
- c) posts portraying feelings of loneliness or inadequacy as helpless and/or deserved;
- d) posts (including quotes, text, voice-overs) intended to portray self-harm, depression and suicidal thoughts as inescapable;
- e) dramatic descriptions of trauma, suffering and suicide;
- f) traumatising imagery;
- g) posts that glamourise, romanticise or trivialise depression, anxiety, self-harm and suicide (including through drawings, comics, use of music and captions);
- h) posts conveying mental-health-related misinformation, e.g. posts dissuading users from seeking professional help or taking prescribed medications, or encouraging self-diagnosis based on misleading information; and
- i) posts that mention plans to self-harm or die by suicide, or explain how to self-harm or die by suicide, or otherwise encourage self-harm or suicide.”<sup>1020</sup>

7.9.64 This study provides an indication of the kinds of content likely to cause significant harm. Some of these posts would be considered suicide or self-harm content (a kind of PPC). The study also acknowledges that further evidence is required to categorise certain kinds of content as harmful. The report states that these categories are “an approximation of the content observed and its potential for harming a person’s mental health”, serving to describe the “dimensions of potentially harmful mental health-related content [...] rather than a binary distinction between ‘harmful’ and ‘non-harmful’ content”.<sup>1021</sup>

7.9.65 Further evidence is required to also determine the context in which significant harm arises. For example, evidence may demonstrate whether significant harm is most likely to arise when content is encountered in large volumes (e.g. via recommended feeds), and/or smaller volumes. Evidence might also identify whether significant harm generally arises particularly when combined with other forms of harmful content, or from this kind of content only.

#### Step 4: An appreciable number of children affected

7.9.66 The affected group may be appreciable. Children with existing mental health conditions are likely to be at particular risk of significant harm, and this represents a sizeable proportion of the child population.<sup>1022</sup> Evidence from the Molly Rose Foundation suggests that this content is being shared by “high-reach, high-engagement accounts that specialise in sharing memes and other clips relating to suicide, self-harm and feelings of depression, misery and extended hopelessness”. Several hashtags featuring language

---

<sup>1020</sup> Amnesty International, 2023. [Driven into Darkness](#).

<sup>1021</sup> Full quote: “The categories used in this report reflect feedback from various experts and clinicians but can nonetheless only ever present an approximation of the content observed and its potential for harming a person’s mental health. The categorization scheme that was used sought to provide a transparent description of the dimensions of potentially harmful mental health-related content that was recommended to the research accounts, rather than a binary distinction between ‘harmful’ and ‘non harmful’ content”. Source: Amnesty International, 2023. [Driven into Darkness](#).

<sup>1022</sup> Recent statistics suggest that one in five children aged 8-16 in the UK have a mental health disorder. Source: NHS England, 2023. [Mental Health of Children and Young People in England, 2023 – wave 4 follow-up to the 2017 survey](#).

related to feeling depressed and “drained” were found to have received over 1 billion views at the time of the study. Although these views will not all be by children, the high reach is indicative of the number of children who could encounter depressive content.<sup>1023</sup>

7.9.67 However, assessing the number of children affected first requires a clear understanding of the category of NDC (Step 3). Once this harmful category of ‘depressive content’ is identified, further evidence can be sought to scope the affected group. For example, we might consider the proportion of children who report encountering this kind of content.

**Additional evidence required:**

We consider that depressive content may be linked to significant harm, namely lasting emotional impacts, including exacerbation of mental health issues such as depression, anxiety, self-harm and suicidal ideation. As indicated in our consultation questions, we invite further evidence from stakeholders on:

- (a) specific examples of depressive content linked to significant harms to children,
- (b) evidence distinguishing body image content from PC or PPC.

---

<sup>1023</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive.](#)

# 7.10 Search services

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of suicide, self-harm, eating disorders and sexual violence.**

In this section, we consider the risk of children encountering harmful content through search services. Most children use search services in some capacity. Our evidence shows that children can access many kinds of harmful content via search services, sometimes with relative ease. This presents a notable risk to children.

The underlying risk of children encountering harmful content via search services stems from the fact that content harmful to children may be indexed and can be presented in search results if the results ranking system – an automated process that determines what the most relevant search results are and what order to present them – enables it. Evidence shows that general search services are likely to present a higher risk to child users than vertical search services, as they offer users access to web pages from across the clear web. Our evidence also indicates that predictive and suggestive search functionalities, as well as image and video search, can increase the risk of harm to children by leading them to or presenting them with harmful search results.

Research explicitly focused on the risk of harm to children from encountering harmful content via search services is limited. We welcome responses including additional research and evidence relevant to the analysis set out in this section, for example in relation to kinds of priority content we are currently unable to make specific references to.

## Introduction

---

- 7.10.1 Search services are the starting point of many users’ online journeys and play a crucial role in making content accessible, including for children. Although they do not host content or enable interaction between users, search services can still cause harm to children by providing a means for child users to locate and access content that is harmful to them.<sup>1024</sup>
- 7.10.2 While evidence indicates that children today are less likely to use search services as frequently, or in the same way, as older people,<sup>1025</sup> the vast majority of children still use search services in some capacity.<sup>1026</sup>

---

<sup>1024</sup> See Section 60 of the Online Safety Act 2023 (the ‘Act’) for a definition of “content that is harmful to children”.

<sup>1025</sup> Google executives have talked publicly about the changing nature of search activity conducted by young people. Source: Perez, S., 2022. [Google exec suggests Instagram and TikTok are eating into Google’s core products, Search and Maps](#). Tech Crunch, 12 July. [accessed 18 April 2024]. Ofcom’s Children’s Media Lives research has consistently found that children conduct their online searching on a wide range of platforms, often starting with social media or video-sharing platforms. Sources: Ofcom, 2023. [Children’s Media Lives](#); Ofcom, 2024. [Children’s Media Lives](#).

<sup>1026</sup> 93% children aged 8-17 in Ofcom’s 2023 Children’s and Parents’ Media Use and attitudes research claimed to use search engines. Source: Ofcom, 2023. [Children’s Media Literacy Tracker](#). In a study that used passive monitoring to measure online activity, 87% of children aged 8-12 in the sample used Google Search. Source: Ofcom, 2023. [Online Nation 2023](#).

- 7.10.3 Search services are, for the most part, designed to optimise the search experience of their users and help them find the content they are searching for. To do so, many search services use an underlying search index,<sup>1027</sup> which captures most of the web pages across the ‘clear web’;<sup>1028</sup> and some form of search result ranking system which is intended to provide the most relevant results to a user.<sup>1029</sup>
- 7.10.4 The risk of children encountering content that is harmful to them is caused by the fact that any content that has been indexed can be presented in search results, if the ranking system enables it, and can therefore be encountered by users including children.<sup>1030</sup> This can happen unless mitigations are in place that specifically minimise the risk of content that is harmful to children from being returned in search results for child users.
- 7.10.5 The introduction of generative artificial intelligence (GenAI) functionality into search services<sup>1031</sup> is also considered to have the potential to lead to risks for children, as these tools can both return indexed results, as described above, and generate novel content in response to prompts, which could be considered harmful to children.<sup>1032</sup> See the Introduction to Register (Section 7) in this volume for more information about the risks GenAI may pose to children.
- 7.10.6 This section summarises our assessment of the risk of harm to children presented by search content on a regulated search service (or combined service, where relevant) which is harmful to children (‘risk of harm’).<sup>1033</sup>
- 7.10.7 We set out the characteristics of search services that we consider are likely to increase the risks of harm. The definition of harm is set out in the Introduction to this volume. ‘Harm’ means physical or psychological harm. Harm can also be cumulative or indirect.
- 7.10.8 Harm can occur to a child as a result of them directly encountering content that is harmful to children in or via the search results<sup>1034</sup> of a search service. Harm can also include instances of indirect harm, in which a group or individual are harmed, or the likelihood of

---

<sup>1027</sup> An index is the database of web pages that can be returned in search results if considered relevant to the search query. Indexing is the process of collecting, analysing, and storing of data to facilitate fast and accurate information retrieval.

<sup>1028</sup> The ‘clear web’ refers to publicly accessible websites that are indexed by search engines. This is distinct from the ‘dark web’.

<sup>1029</sup> Ranking involves scoring each item based on its predicted relevance to the user. While search services deploy various methods to rank content, common factors that inform this process are relevance, trustworthiness and popularity of the potential results in the index that could be returned against a query.

<sup>1030</sup> Not every search service presents content to users in this way; some source their content from pre-determined locations rather than an index of ‘clear web’ webpages. See the ‘Service types’ sub-section within this section for an explanation of the different types of search service.

<sup>1031</sup> For example, both Google and Bing have integrated GenAI chatbots into their products to support users with searches and content creation (currently limited to text).

<sup>1032</sup> Refer to Introduction to Register (Section 7) within this volume for more information and a summary of the evidence to date, which indicates that generative AI tools can be used to create a range of content that would be considered harmful to children.

<sup>1033</sup> Section 98 of the Act.

<sup>1034</sup> Section 57 of the Act defines both search content and search results. Broadly, search content is content encountered in or via a search result (i.e. content encountered as a result of interacting with search results, for example by clicking on them), and does not include content encountered through subsequent interactions with a service other than the search service. Paid-for advertising content on the website of a recognised news publisher, and other journalistic content, is excluded from this definition.

harm is increased, as a consequence of a child harmful content on search services, which then affects their behaviour towards other children.<sup>1035</sup>

- 7.10.9 ‘Search content’ can consist of words, images, videos, speech, and sound. All of these forms of content can constitute content that is harmful to children.<sup>1036</sup> For more detail on what constitutes content that is harmful to children (including examples of what Ofcom consider to be, or not to be, content that is harmful to children), please refer to the draft Guidance on Content Harmful to Children (Section 8) in this volume.

## How harm manifests on search services

---

### Risk of harm to children presented by content that is harmful to children on search services

- 7.10.10 Although the way in which a child may encounter content that is harmful to them may be different on search services compared to U2U services, the impact on children is comparable. Most published evidence relating to harmful content accessible via search services focuses on the risk of encountering such content, rather than the physical or psychological harm that results from it. To understand in more detail how the risks of harm to children manifest as a result of encountering harmful content refer to Introduction to Register (Section 7).

### Encountering content that is harmful to children on search services

- 7.10.11 The evidence discussed in the following sub-section suggests that search services are an effective way for users – including children – to find various kinds of content that may be harmful to children, by deliberately entering search requests relating to such content.
- 7.10.12 There is also evidence to suggest that users, including children, could encounter content that is harmful to children without intentionally searching for it, i.e. through inputting innocuous search queries.<sup>1037</sup> This relates to functionality such as search prediction and related searches (see the ‘Search prediction and personalisation’ sub-section in this section).

## Evidence of risk factors on search services

---

- 7.10.13 The evidence reviewed in this section focuses on whether the characteristics<sup>1038</sup> – including service type, functionalities, business models and user base – of search services appear to play any role in the risk of harm to children. This would lead to any such

---

<sup>1035</sup> See sections 234(5) and 234(8) of the Act.

<sup>1036</sup> See section 60 of the Act 2023 and Introduction to Register (Section 7) of this volume of our consultation.

<sup>1037</sup> Reports from 2018 highlighted that major search engines were providing users with concerning suggestions in relation to certain innocuous search queries, particularly within their predictive search (autocomplete) and search suggestions functionality. Source: Hoffman, C., 2018. [Bing Is Suggesting the Worst Things You Can Imagine](#), HowToGeek, 10 October. [accessed 18 April 2024]. Subsequent references to this source throughout; Lapowsky, I., 2018. [Google Autocomplete Still Makes Vile Suggestions](#), Wired, 12 February. [accessed 18 April 2024]. Subsequent references to this source throughout.

<sup>1038</sup> For further information on the characteristics, see the Introduction to the Register (Section 7).

characteristic being considered a risk factor for search services, and liable to increase the risk of harm to children.

- 7.10.14 Evidence in this section is predominantly concerned with content harmful to children as defined in the Online Safety Act 2023 ('the Act'). However, the wide range of illegal content that can be encountered via search services, as discussed in Section 6T of our [Illegal Harms Register](#), can lead to harm to all users including children.

## Risk factors: service types

- 7.10.15 Ofcom has identified several types of search services, based on the definitions in the Act and how search services operate:
- a) **General search services:** General search services enable users to search the contents of the web by inputting search queries on any topic and returning results. There are two types of general search service: services which build their own index of webpages;<sup>1039</sup> and those which provide access to the index of another search service – these are referred to as 'downstream' general search services.<sup>1040</sup>
  - b) **Vertical search services:** Also known as 'speciality search engines', vertical search services enable users to search for specific topics, or products or services offered by third-party providers. They operate differently to general search services. Rather than crawling the clear web and indexing webpages, they present users with results only from selected websites with which they have a contract, and an API<sup>1041</sup> or equivalent technical means are used to return the relevant content to users. Common vertical search services include price comparison sites and job listing sites.
- 7.10.16 All the published evidence referenced in this section comes from research and investigations that focused on general search services. This is due to a lack of published research exploring the risk of harm on vertical search services.
- 7.10.17 User-to-user<sup>1042</sup> services that include a public search engine which operates as a general or vertical search service (as distinct from a functionality that allows a user to search only the contents of the user-to-user service), would be considered a 'combined' service.
- 7.10.18 The ability of users to enter search queries relating to content that is harmful to children, and to receive related results, is the main underlying driver of the risk of harm to children associated with search services. Therefore, the key distinctions between the types of search service are:
- a) the source of the content that is presented to users in the search results; and

---

<sup>1039</sup> General search engines work by using crawlers (also called bots) to find content across the clear web ('crawling'); building an index of URLs by validating and storing the content found in a database ('indexing'); and using algorithms to rank the content based on relevance to the search query ('ranking').

<sup>1040</sup> The Act defines the 'provider' of the search service as being the person in control of the operation of the search engine. Refer to the Glossary within this volume for more information and a full definition of downstream general search services.

<sup>1041</sup> Application Programming Interface: a way for two or more computer programs to communicate with each other.

<sup>1042</sup> 'User-to-user service' is defined in section 3 of the Act and described in the Introduction to the Register (Section 7).

- b) the default assumptions about whether the user is a child and, as a direct result, the limitations placed on what content can be returned in search results.

### Source of content

7.10.19 If any content that is harmful to children may be encountered in or via the webpages or databases from which a search service derives its search results, then it could be encountered by child users. General search services are likely to be inherently higher risk to child users, as they present users with access to web pages from across the clear web. Unless specialising in types of content harmful to children, vertical search services are likely to have lower inherent risk, given the smaller range of content presented to users, and sources from which it originates. For example, a travel search site may be much less likely to present a user with content harmful to children, as the search feature on the site will be limited to hotels/flights/car rentals on the websites/databases of travel agents. However, we cannot assume that there is no risk of children encountering harmful content via vertical search services, because providing access to harmful content through a vertical search service could be an entirely legal activity, e.g. a vertical search service for pornographic content.<sup>1043</sup>

### Identification of child users

7.10.20 Given the public nature of search services, users are not required to create accounts, or sign in (including verifying their ages using any form of age assurance), as consistently as users of other types of service.<sup>1044</sup> Therefore, in general, search services are less likely to know the age of users. Without this knowledge, a service has limited ability to prevent content harmful to children as defined in the Act from being returned in search results.

### General search services

7.10.21 Research has shown that searching for suicide, self-injury and eating disorder content can return large volumes of content. Research commissioned by Ofcom and conducted by the Network Contagion Research Institute explored the relative volume of content found via major search services. Researchers conducted test searches – which could have been made by users of any age – that were intended to return a variety of content harmful to children.<sup>1045</sup> Large volumes of content were returned, and the analysis of the webpages linked to in the search results concluded that one in five of these results promoted “self-injurious” behaviour in some form.<sup>1046</sup> For example, 13% of the results from the search queries relating to suicide were classified as likely to be “in scope” (posts that encourage others to engage in self-injurious behaviour) or “extreme” (posts that glorify or celebrate

---

<sup>1043</sup> At the time of writing, we are unaware of any clear web vertical search services that draw their search result content from databases of content that is harmful to children.

<sup>1044</sup> A review of the current measures deployed on Google Search and Bing Search concluded that the combination of voluntary registration of child accounts and age inference technology were not deployed consistently enough to ensure that search services could robustly and consistently distinguish between adult and child users.

<sup>1045</sup> Content related to suicide, self-injury and eating disorders in the research aligned with the equivalent categories of primary priority content in section 61 of the Act.

<sup>1046</sup> Of 37,647 search results reviewed, resulting from 450 search queries, researchers classified 22% as containing content that clearly promoted self-injurious behaviour (related to eating disorders, suicide or non-suicidal self-injury). Note that the search queries tested were formulated with the intention that they would return such content if it was accessible via a search engine. Source: Ofcom, 2024. [One Click Away: A Study on the Prevalence of Non-Suicidal Self Injury, Suicide, and Eating Disorder Content Accessible by Search Engines](#). Subsequent references to this report throughout.



self-injurious behaviour by oneself or others).<sup>1047</sup> This content often appeared high up in the search results.<sup>1048</sup>

- 7.10.22 The researchers also identified that image results presented a greater proportion of harmful content than other forms of search results.<sup>1049</sup> This is particularly relevant to content that is harmful to children, as much of the primary priority content (such as self-injury content) is inherently visual in nature.
- 7.10.23 A 2021 study had similar findings: search queries covering general suicide-related terms and those targeting specific suicide methods returned a range of harmful results within the first 20 listed.<sup>1050</sup>
- 7.10.24 The studies highlighted in the previous paragraphs demonstrated that if a user searches for potentially harmful content, they are likely to find it. There is also evidence that young people and children search for some kinds of potential harmful content on search services. A study that investigated 145 cases of suicide in young people under the age of 20, including children, found that “Internet use related to suicide (i.e., internet searches for suicide methods, suicidal ideas posted on social media, or online bullying) was recorded in 30 (23%) deaths. Of the 16 individuals who had searched the internet for information about suicide methods, five died by a method they were known to have searched.”<sup>1051</sup> Another study reported that research, sampling the search history of individuals hospitalised for suicidal thoughts and behaviours, identified that in 21% of these cases, users had searched for information that matched their chosen suicide attempt method.<sup>1052</sup>
- 7.10.25 Other research has highlighted that pro-eating disorder<sup>1053</sup> and pro-suicide websites and blogs, accessible through search services, have enabled users – including children – to encounter harmful content.<sup>1054</sup>

---

<sup>1047</sup> Ofcom, 2024. [One Click Away](#).

<sup>1048</sup> 18% of the search results that appeared first (or top) in the list of results analysed in the Ofcom/NCRI study were classified as promoting self-injurious behaviour. This pattern was consistent across all search services tested. Source: Ofcom, 2024. [One Click Away](#).

<sup>1049</sup> When analysing search results (returned for search queries that were designed intentionally to find harmful content, if it existed) researchers noted that “Over a quarter of image searches (28%) were coded as likely in scope or extreme [both referring to content that would be considered as harmful to children], whereas this was true for only 20% of web searches and 16% of video searches”. Source: Ofcom, 2024. [One Click Away](#).

<sup>1050</sup> The study found that 22% of Microsoft Bing URLs, 19% of DuckDuckGo URLs and 7% of Google Search URLs were ‘harmful’, meaning determined by the researchers as encouraging, promoting, or facilitating suicide or containing discussions of suicide. Source: Borge, O., Cosgrove, V., Cryst, E., Grossman, S., Perkins, S. and Van Meter, A., 2021. [How Search Engines Handle Suicide Queries](#). [accessed 18 April 2024].

<sup>1051</sup> Note: Study of 43 participants aged between 15 and 30. Source: Rodway, C., Tham, S., Ibrahim, S., Turnbull, P., Windfuhr, K., Shaw, J., Kapur, N. and Appleby, L., 2021. [Suicide in children and young people in England: a consecutive case series](#). [accessed 18 April 2024].

<sup>1052</sup> Moon, KC., Van Meter, AR., Kirschenbaum, MA., Ali, A., Kane, JM., Birnbaum, ML., 2021. [Internet Search Activity of Young People With Mood Disorders Who Are Hospitalized for Suicidal Thoughts and Behaviors: Qualitative Study of Google Search Activity](#). [accessed 21 April 2024].

<sup>1053</sup> Ofcom research also highlighted that pro-eating disorder content was the most prevalent within the samples analysed. Source: Ofcom, 2024. [One Click Away](#).

<sup>1054</sup> For example, an investigation into a pro-suicide website by the New York Times in 2021 highlighted that users aged under 18 had been able to access this site by searching online. Source: Twohey, M. and Dance, GJX., 2021. [Where the Despairing Log On, and Learn Ways to Die](#). New York Times, 9 December. [accessed 11 April 2024].

- 7.10.26 There is more published research on the topic of children’s access to pornographic content via search services. Large proportions of children report seeing pornography on or via search services.<sup>1055</sup> Ofcom’s Online Experience Tracker found that in the four weeks leading up to Ofcom’s study, three of the 18 respondents (16%) aged 13-17 who had encountered sexual or pornographic content “most recently”, had done so through a search engine.<sup>1056</sup> Search services are also mentioned in qualitative research as one of the ways in which children first encounter pornographic content, both through intentional and unintentional searches.<sup>1057</sup> Other examples highlight the role search services play, alongside social media, in enabling children to encounter pornographic content.<sup>1058</sup>
- 7.10.27 Published evidence on other kinds of content which is harmful to children is limited, but there are some indications that children might be accessing such content via search services. For instance, education professionals have reported finding far-right content in school computer search histories.<sup>1059</sup> This content may be abusive or incite hatred against people with protected characteristics.<sup>1060</sup> Recent research has also explored instances of users of U2U services directing other users – with no distinction between adults and children – to input specific search queries on search services, knowing these will return certain content. Given that content harmful to children is currently accessible via search services, as evidenced by much of the research referenced in this section, such activity poses a risk that children could be encouraged to search for harmful content on search

---

2024]; Mento, C., Silvestri, MC., Muscatello, MRA., Rizzo, A., Celebre, L., Pratico, M., Zoccali, RA., and Bruno, A., 2021. [Psychological Impact of Pro-Anorexia and Pro-Eating Disorder Websites on Adolescent Females: A Systematic Review](#). [accessed 18 April 2024].

<sup>1055</sup> Results from a survey conducted by the Children’s Commissioner indicated that 30% of children had reported seeing pornography on search engines. Source: Children’s Commissioner, 2023. [‘A Lot of it is Actually Just Abuse’ Young People and Pornography](#). [accessed 18 April 2024].

<sup>1056</sup> Respondents were asked which kinds of content they had encountered in the previous four weeks, and then which of those kinds of content was the most recent kind they had encountered – only these respondents were asked where they had encountered this. Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1057</sup> In research with UK children many respondents described their first viewing of pornography as “accidental”, including through Google searches, where many described unwittingly searching using terms such as ‘sex’ or ‘porn’ without understanding what these words meant. Source: Revealing Reality, 2020. [Young People, Pornography & Age-verification](#). [accessed 18 April 2024].

<sup>1058</sup> Ofcom research from 2022 provides one example: Ethan (aged 10) reported coming across porn after searching a term [the name of a lesser-known porn site] after seeing a video on a social media platform about it. The post read “don’t ever search [name of porn site] up” and this enticed Ethan to see what it was. “I saw this [video], and it said, ‘Don’t ever search this up’. I searched it up [using a search engine] as I thought it was just going to be a little scary thing or whatever... They were right [I shouldn’t have searched the term].” Source: Ofcom, 2022. [Risk factors that may lead children to harm online](#).

<sup>1059</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 18 April 2024]. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>1060</sup> Abusive and hateful content are examples of priority content that is harmful to children as listed in section 62 of the Act.

services and find it. The research highlights an example of users being encouraged to search for content that promoted self-administering harmful substances.<sup>1061 1062</sup>

## Risk factors: user base

- 7.10.28 The user base includes the size and composition of the users of search service, covering demographics and other characteristics. Although the user base is included here as a characteristic, it is only considered in a very limited way, compared to U2U services' user bases. This is because user bases on search services are particularly difficult to measure, as in most cases there is no need to have an account to be able to use the service.
- 7.10.29 Although some search services target children as their priority user group, they also operate as either general or vertical search services, as described above. They may use branding and aesthetics to appeal to a child audience, and this focus might also inform the type of functionality deployed on such a search service. For example, a general search service targeted at children could intentionally return only those results that are deemed appropriate by a safety filter (e.g. SafeSearch), or provide only results from selected websites such as online encyclopaedias to deliver a child-friendly experience. But in practice, having children as a target audience does not in itself increase or decrease risk; the most important element is the combination of risk factors described below and any mitigations associated with these.

### User base size

- 7.10.30 The size of a search service's user base is a risk factor; all else equal, a service with a large user base could lead to more children encountering content that is harmful.

### User base demographics

- 7.10.31 While the use of search services in some capacity is nearly universal – over 9 in 10 8–17-year-olds say they use search engines – it is reasonable to assume that user base demographics will differ from one service to the next. For general search services, the volume of children reporting having “ever” used these sites is relatively consistent, with only small differences by age, and no significant differences by gender or socio-economic group.<sup>1063</sup>
- 7.10.32 As shown in the Introduction to Register (Section 7), certain groups are considered to be at greater risk of encountering, or being harmed by, certain kinds of content that is harmful to children. The characteristics of a search service's child users should therefore be considered as a factor which influences the relative risk of harm to children occurring

---

<sup>1061</sup> Content that encourages self-administering of harmful substances is an example of priority content that is harmful to children as listed in section 62 of the Act.

<sup>1062</sup> As highlighted in the research: “Search directives can be an effective tool for indirect online influence, because instead of guiding people directly to content (e.g. a news article), they indirectly guide people to it through an independent intermediary (e.g. Google Search). By directing viewers to ‘do their own research’ on a known, trusted, or seemingly objective intermediary, search directives have advantages in terms of both persuasion, by making people feel as if they discovered the content on their own, and evasion, by not directly posting the target link(s)”. Source: Robertson, E., Dunphy, A., Grossman, S., DiResta, R. and Thiel, D., 2023. [Identifying Search Directives on Social Media](#). [accessed 18 April 2024].

<sup>1063</sup> In Ofcom's children and parent media use and attitudes research 93% of all children surveyed aged 8-17 answered yes to the question “Do you ever use sites or apps like Google, Bing or Yahoo to look for things online?”; 92% among 8-12 year olds; 97% among 13-15 and 16-17 year olds; 92% among male 8-17 year olds; 93% among female 8-17 year olds; and similar figures for children across all social grades: AB, C1 and C2 = 93%; DE = 91%. Source: Ofcom, 2023. [Children's Media Literacy Tracker](#).

via that service. For example, vulnerable children (and particularly those with more than one characteristic that could make them vulnerable) could be impacted differently by the harm they encounter in search results.

## Risk factors: functionalities

- 7.10.33 The Act defines ‘functionalities’ for search services as including “a feature that enables users to search websites or databases” and “a feature that makes suggestions relating to users’ search requests (predictive search functionality)”.<sup>1064</sup>
- 7.10.34 Below, we have highlighted specific features of search services that fit within these two broad categories. These service functionalities are designed largely to optimise the accuracy and usefulness of search results to users, including child users. Where a child user is intentionally seeking out content that may be harmful to children, these same optimising characteristics can have the unintended consequence of helping a child user encounter that content.

### Search query inputs

- 7.10.35 The functionalities that enable users to input search queries can affect what search queries are made, and may therefore influence the results presented to users, including child users.
- 7.10.36 A consistent finding across the research into the accessibility of illegal content and content that is harmful to children via search engines referenced in this section and in the Illegal Harms Register is that the use of ‘coded language’ – language that is often uniquely associated with the illegal or harmful content a user is seeking – tends to be an effective way to find this kind of content via search services.

### Search prediction and personalisation

- 7.10.37 Search services may use functionalities designed to improve the search experience for a user through personalisation (where data providing contextual information about the user, such as their geographical location, can influence the search results) as well as anticipating potential search queries, and providing suggestions for further searches based on an initial search query.

#### *Predictive search*

- 7.10.38 Predictive search anticipates a search query (eg. autocomplete), based on a variety of factors (including those related to the search results’ ranking).
- 7.10.39 The evidence shows that autocomplete suggestions have the potential both to help users find content, via search services, which may be considered harmful,<sup>1065</sup> and present users with suggested search queries where the suggested phrase itself is “perceived as biased, offensive, or in some other way harmful”.<sup>1066</sup>

---

<sup>1064</sup> Section 233(3) of the Act.

<sup>1065</sup> In Section 6T of the [Illegal Harms Register](#) within our Illegal Harms Consultation several sources of evidence are referenced demonstrating the role of autocomplete in aiding searches for kinds of potentially illegal content, and it is reasonable to assume the functionality works similarly for searches of content of all kinds.

<sup>1066</sup> Olteanu, A., Diaz, F. and Kazai, G., 2020. [When Are Search Completion Suggestions Problematic?](#) [accessed 11 April 2024].

- 7.10.40 For example, concerns have been raised for many years about autocomplete suggestions on search services that lead to harmful content, are in some cases considered harmful in their own right, and notably in regard to risks to children can stem from innocuous search queries.<sup>1067 1068</sup>

#### *Suggestive search*

- 7.10.41 ‘Suggested searches’ are search queries recommended by the search service that refine or build on the initial search query. These could help the user explore related topics or navigate them to a more specific query.
- 7.10.42 Research into illegal harms has demonstrated that these suggested search features can help facilitate the discovery of illegal content online in cases where a user is actively searching for it.<sup>1069</sup> It can be assumed that the same functionality would work for a user – of any age – who is actively looking for content that is harmful to children.

### Other features and functionalities

#### *Image or video search*

- 7.10.43 The ability to search for images or videos can increase the risk of children encountering harmful content. In some cases it appears that image results can be more likely to contain content that is harmful to children than standard text/URL search results – as highlighted in recent research looking at content promoting self-injurious behaviour.<sup>1070</sup> Providing images out of their original context has also been flagged as a potential risk for complex topics such as eating disorders, where the context in which an image is used in, e.g., a news article, is very important.<sup>1071</sup>
- 7.10.44 There are also reports of AI-generated pornographic imagery being presented to users as the first image result on major general search services, in response to simple search queries.<sup>1072</sup>
- 7.10.45 More generally, image results have been highlighted as a particularly effective way for users to find some kinds of illegal content via general search services, and it is reasonable

---

<sup>1067</sup> For instance, in 2018 articles on tech news sites highlighted a series of concerning autocomplete suggestions uncovered by journalists, including “awful autocomplete suggestions for queries related to gender, race, religion, and Adolf Hitler”; another article claimed “Bing suggests racist terms and shows horrifying images. Bing will even suggest you search for exploited children if you have SafeSearch disabled”. Sources: Lapowsky, I., 2018. [Google Autocomplete Still Makes Vile Suggestions](#), Wired, 12 February; Hoffman, C., 2018. [Bing Is Suggesting the Worst Things You Can Imagine](#), HowToGeek, 10 October.

<sup>1068</sup> The Antisemitism Policy Trust provided several examples of hateful or racist predicted search queries on major search services. Source: [Antisemitism Policy Trust response](#) to 2022 Ofcom Call For Evidence: First phase of online safety regulation. See in particular ‘Question 2. Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?’.

<sup>1069</sup> See Section 6T of our [Illegal Harms Register](#) within our [Illegal Harms Consultation](#).

<sup>1070</sup> Ofcom, 2024. [One Click Away](#).

<sup>1071</sup> Allen, J., 2024. [Why Is Instagram Search More Harmful Than Google Search?](#) Integrity Institute, 13 February. [accessed 11 April 2024].

<sup>1072</sup> “NBC News found that deepfake pornographic images featuring the likenesses of female celebrities were the first images Google and other top search engines surfaced in searches for many women’s names and the word “deepfakes,” as well as general terms like “deepfake porn” or “fake nudes.” The searches were conducted with safe-search tools turned off.” Source: Tenbarge, K., 2024. [Google and Bing put nonconsensual deepfake porn at the top of some search results](#). NBC, 11 January. [accessed 11 April 2024].

to assume that this functionality also presents opportunities for children to access other kinds of potentially harmful content.<sup>1073</sup>

## Risk factors: business models and commercial profile

7.10.46 There is very limited evidence linking commercial aspects of the search services to an increased risk of children encountering harmful content, so the arguments presented below are logic-based and may apply to different kinds of content harmful to children.

### Revenue models

7.10.47 In general, search services generate revenue using an advertising-based model.<sup>1074</sup> They are paid by businesses to display advertising for their products/services alongside the search results. For example, advertisers may pay the search service whenever a user clicks on their advert or sponsored link.<sup>1075</sup> We understand that downstream general search services also earn revenue through advertising.<sup>1076</sup> This model is distinct from user-to-user advertising models in so much as search services are not designed to maximise dwell time on the site.

7.10.48 Although there is very little published evidence showing direct links between revenue models and the presence of content that is harmful to children in search results, there remains a reasonable risk that paid-for advertising containing or related to harmful content, while not falling within the definition of ‘search content’ in the Act, could encourage children to search for such content and find it via search services.<sup>1077 1078</sup>

### Growth strategy and commercial profile

7.10.49 Having an expansive search index that can provide relevant content in response to a user’s queries is a core component of all search services. At the same time, ensuring that any indexed webpages which contain content that is harmful to children are downranked, or do not appear in search results for child users requires appropriate processes to grade and rank indexed webpages and/or assess the age of users in order to return age-appropriate results.

7.10.50 Despite the limited evidence, we consider that low-capacity and/or early-stage search services may have more limited ability to develop and deploy highly effective processes to

---

<sup>1073</sup> For example, the Commission on Combating Synthetic Opioid Trafficking in the United States highlighted the importance of image search results in finding and selling fentanyl and other synthetic opioids. Source: RAND, 2022. [Commission on Combating Synthetic Opioid Trafficking – Technical Appendices](#). [accessed 18 April 2024].

<sup>1074</sup> Some search engines use a subscription model in lieu of advertising to generate revenue, although this is exceedingly rare. Kagi is one such subscription-based service. Source: Kagi, 2024. [Why pay for search](#). [accessed 18 April 2024].

<sup>1075</sup> This is the main pricing structure used by Google Search and Bing Search, the largest search services in the UK in terms of user numbers. Source: CMA, 2020. [Online platforms and digital advertising: Market study final report](#). [accessed 21 April 2024].

<sup>1076</sup> CMA, 2020. [Online platforms and digital advertising: Market study final report](#); Australian Competition & Consumer Commission, 2021. [Digital platform services inquiry: Interim report No. 3 – Search defaults and choice screens](#). [accessed 18 April 2024].

<sup>1077</sup> Paid-for advertisements, as defined in section 236 of the Act, are not classified as a form of ‘search content’ under the Act; see section 57(2)(a). Paid-for advertisements are therefore not in scope of the duties that apply to regulated search services.

<sup>1078</sup> Where a search service is aware that a user is a child, different rules on what types of adverts may be shown may apply. For example, Google restricts various categories of advertising for children. Source: Google, 2024. [Ad-serving protections for children](#). [accessed 11 April 2024].

minimise the risk of child users encountering harmful content, such as technically advanced moderation processes. Given that the underlying rating and ranking processes of established search services have been very well funded, and have been in development for many years, and yet there remain many instances where there is a material risk to children encountering harmful content, we consider this a potential risk factor.



# 7.11 Governance, systems and processes

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of suicide, self-harm and eating disorders.**

This section assesses how a service's governance structures, systems and processes may be relevant to the risk of harm that children experience on a service.

Depending on how they are implemented, some governance structures, systems and processes may exacerbate the risk of harm to children. If a service's systems and processes have not been designed with child users in mind, and/or if child safety has not been made a priority within its governance structures, children can be more likely to encounter harmful content.

Evidence from various sectors shows the importance of having adequate governance arrangements and senior accountability for mitigating risks within an organisation, with several organisations calling for improved governance practices within online services regarding child safety.

Content moderation systems which are poorly designed or resourced may contribute to children being exposed to harmful content. For example, if a content moderation system is not sophisticated enough, it may not be able to detect coded hashtags that disguise harmful content on services and swiftly remove it.

Evidence shows that user access systems can present a risk of harm to children, as the absence of robust age assurance systems can enable children to access spaces that were not designed for them. For instance, some children can create online profiles with a false older age, giving them access to functionalities and content that are only appropriate for adults. Search services may not always be able to distinguish between a child or an adult user, which can cause children to encounter harmful content when using them.

We consider how service design affects risk of harm to children. Evidence shows that children often encounter harmful content through recommender systems. In severe cases, children can be vulnerable to experiencing 'rabbit holes' of harmful content as a result of content recommendations.

Some children use the user support tools available on services to protect themselves online, such as blocking content or blocking accounts, although use remains low. Evidence indicates that children do not report or complain about harmful content if the reporting channels are unclear or hard to find, or if the process is too time-consuming or complicated.

We also note how a service's terms of service should be easy to read and find for all users for it to be effective. However, because many require advanced reading skills to understand, they can often prevent children from making better-informed choices about what services to use and how to stay safe online.

## Introduction

---

- 7.11.1 This section assesses how a service’s governance structures, systems and processes may be relevant to the risk of harm that children experience on a service. We expect services to use this information when considering how their own current or future governance structures, systems and processes will affect children’s safety. Services should have the right governance arrangements in place and have appropriate systems and process to help them effectively manage and reduce the risk of harm to children.
- 7.11.2 Here we take a similar approach to that of the equivalent section in the [Illegal Harms Register](#) in our the [Illegal Harms Consultation](#). This is because we find that the governance structures, systems and processes which services may have in place are applicable to affecting the availability of content that is harmful to children on that service, including illegal content. As in the Illegal Harms Register, we have assessed governance structures, systems and processes separately, because the analysis of risk arising from these characteristics applies to different kinds of online harms.
- 7.11.3 This section summarises relevant evidence from the harms-specific sections in this Register, and provides supporting evidence for our proposed safety measures, as set out in our draft Children’s Safety Codes (Volume 5). It also provides evidence on risks of harm that go beyond our proposed measures so that service providers are aware of these in case new measures need to be developed to address them in the future.

### Summary

- 7.11.4 As set out in the equivalent section in the [Illegal Harms Register](#), we recognise that governance structures, systems and processes are often put in place by services to mitigate the risk of harm to users; yet risk of harm can arise from a) inadequate governance and/or other systems and processes and b) an absence of such governance and other systems and processes.
- 7.11.5 We have also drawn on some evidence that is relevant to how governance, systems and processes may impact children in particular. This shows that depending on how they are implemented, some governance structures, systems and processes may exacerbate harm to children. If systems and processes have not been designed with child users in mind, this could have eventual negative impacts on the child’s online experiences, and lead to harm. Likewise, if child safety has not been made a priority within the governance structures of services, this could risk exposure to harmful content for children.

### Definitions

- 7.11.6 The Online Safety Act 2023 (‘the Act’) does not define ‘Governance’. Based on our understanding of the sector, and the evidence consulted, Ofcom has interpreted the concept of governance in the context of online safety as “any structure, or structures to ensure that decisions are made with adequate oversight, accountability, transparency and regard to online safety compliance, specifically in relation to risk management, product and content governance within a service”.<sup>1079</sup>

---

<sup>1079</sup> Milliman (commissioned by Ofcom), 2021. [Report on principles-based best practices for online safety Governance and Risk. Management](#). [accessed 17 April 2024]. This definition aligns with Milliman’s description of governance, made up of the concepts of individual and overall accountability, non-executive oversight, independent executive oversight, oversight of risk strategy and appetite, monitoring of the effectiveness of

7.11.7 ‘Systems and processes’ are described in the Act as “any human or automated systems and/or processes, and accordingly, includes technologies”.<sup>1080</sup> In this section, we interpret this to mean any series of actions taken by a service, including actions that mitigate the risks of children being harmed by encountering content that is harmful to them, which may not have been addressed elsewhere in the Register.

## Evidence of risks of harm to children arising from governance, systems and processes

---

7.11.8 This section is structured as per our draft Children’s Safety Codes (Volume 5), with the addition of Governance and accountability which is in our draft Children’s Risk Assessment Guidance (Volume 4):

- a) Governance and accountability
- b) User access
- c) Content moderation
- d) User reporting and complaints
- e) Terms of service
- f) Service design: Recommender systems
- g) Service design: User support
- h) Search services (including service design and search moderation)

### Governance and accountability

7.11.9 Our provisional findings about services’ governance structures, which we set out in the [Illegal Harms Register](#)’s equivalent Governance, Systems and Processes section, also apply to mitigating the risk of harm to children. This is because the governance structures that services have in place could affect the availability of content that is harmful to children on that service, as well as illegal content.

7.11.10 In summary, in the Illegal Harms section we provisionally found that the following governance failures within services could lead to risk of harm to users: 1) insufficient oversight and scrutiny of risk management activities; for example, from ineffective, or lack of, appropriate governance bodies;<sup>1081</sup> 2) lack of senior accountability;<sup>1082</sup> and 3) inadequate compliance training for staff.<sup>1083</sup> Full analysis of supportive evidence can be found in the [Illegal Harms Register](#)’s Governance, Systems and Processes section.

---

risk management, effective communication of risk, and setting an appropriate risk culture and aligned incentives. We consider that in the context of online safety, governance relates more broadly to structures which work to ensure that decisions are aligned with user safety at all levels of an organisation.

<sup>1080</sup> Section 236 of the Act.

<sup>1081</sup> The Health and Safety Executive offers several case studies of negative safety consequences when senior staff do not lead effectively on health and safety management. Source: Health and Safety Executive, n.d. [Case studies: When leadership falls short](#). [accessed 17 April 2024].

<sup>1082</sup> Evidence from other sectors indicates that inadequate leadership is one of the key contributors to poor safety outcomes. For example, there is evidence from financial services and health and safety sectors in high-profile cases. Source: Health and Safety Executive, 2013. [Leading health and safety at work: Actions for directors, board members, business owners and organisations of all sizes](#). [accessed 17 April 2024].

<sup>1083</sup> Governance failures have contributed to serious corporate scandals. In the case of Siemens, which in 2008 was subject to regulatory investigations for bribery. The failure to embed a programme of compliance and

- 7.11.11 In addition to these findings, we have examined the following supporting evidence; wherever possible, on the risks to children’s safety specifically. Further information on how services can mitigate risk of harm can be found in our draft Children’s Safety Codes (Volume 5).

## Governance arrangements

- 7.11.12 The lack of, or inadequate governance arrangements that specifically protect children could put children’s safety at risk. It is reasonable to infer that children may be more likely to be exposed to harmful content where there is insufficient oversight and scrutiny of risk management activities, through lack of, or inadequate, governance bodies<sup>1084</sup> or governance frameworks.<sup>1085</sup> Various sectors acknowledge that organisations should have, at a minimum, a written statement or rules in place to protect children who encounter the organisation. The online sector, including U2U and search services, is no exception. Written statements committing to child safety from organisations such as the BBC,<sup>1086</sup> the Nursing and Midwifery Council<sup>1087</sup> and NSPCC<sup>1088</sup> demonstrate why setting organisation-wide standards is necessary to safeguard children’s experiences.

## Senior accountability

- 7.11.13 Senior accountability is considered critical for building an organisational culture that prioritises child safety. The absence of senior oversight, or responsibility for user safety decisions, within a service provider could lead to failure to oversee and address risk management activities by an overall governance body or board. In response to our Call for Evidence, several children’s organisations called for improved senior accountability, and the delegation of clear roles and responsibilities, for child safety within services.<sup>1089 1090</sup>

---

code of conduct for staff has been cited as playing a ‘decisive role’ in the scandal. Source: Primbs, M. and Wang, C., 2016. [Notable Governance Failures: Enron, Siemens and Beyond](#). *Comparative Corporate Governance and Financial Regulation*. 3. [accessed 17 April 2024].

<sup>1084</sup> One of the key remits of a governance body is to monitor the effectiveness of a company’s risk and governance practices. Source: OECD, 2023. [G20/OECD Principles of Corporate Governance](#). [accessed 17 April 2024].

<sup>1085</sup> There are several recommended governance frameworks available to set standards for protecting children online. For example, the Center for Countering Digital Hate advocates a global standard of social media regulation called the STAR Framework, with advice for governance, accountability and decision-making structures towards platform and user safety, including safety by design, transparency, answerability to democratic and independent bodies, and responsibility for companies and their senior executives. Source: [Center for Countering Digital Hate](#) response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1086</sup> The BBC’s Child Protection Code of Conduct sets out rules for interacting directly with children in any capacity on behalf of the BBC, including prioritising the safety and wellbeing of the child at all times. Source: BBC, 2017, [BBC Child Protection Code of Conduct](#). [accessed 17 April 2024].

<sup>1087</sup> The Nursing and Midwifery Council sets out standards to protect children from abuse and maltreatment and prevent harm to children’s health or development. Source: The Nursing and Midwifery Council, November 2018. [Policy on Safeguarding and Protecting People](#). [accessed 17 April 2024].

<sup>1088</sup> The NSPCC provides a set of recommended standards and accompanying guidance to help non-statutory organisations in the UK which work with children to put clear safeguarding arrangements in place. Source: NSPCC, 2019. [Standards and guidance for children and young people aged 0-18](#). [accessed 17 April 2024].

<sup>1089</sup> Samaritans recommend that companies should ensure that accountability for all policies relating to the protection and safety of users is in place at a senior level, and that clear roles and responsibilities should be assigned to individual roles or teams, to ensure that policies are well developed, implemented and reviewed. Source: [Samaritans response](#) to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1090</sup> The 5Rights Foundation recommends, in its Standard for Age Appropriate Digital Service Framework, establishing the roles such as a child safety lead and a child rights advocate within services to ensure user

<sup>1091</sup> The NSPCC, in particular, has said that to ensure children are safe “*we need to create a culture of compliance within online service providers*” which needs to start at the top of the organisation.<sup>1092</sup> It cited a YouGov survey which found that 81% of UK adults want senior tech managers to be appointed and held legally responsible for stopping children being harmed by social media; and 66% of those with an opinion would want senior managers prosecuted for failures that result in serious harm to children.<sup>1093</sup>

7.11.14 The importance of senior accountability for mitigating risks is recognised in other sectors, such as banking and AI governance. In addition to the evidence in the equivalent Illegal Harms section, we found that a study evaluating a regulation designed to address ongoing risk management failures in Australia’s banking sector found that “*greater felt accountability among senior executives stimulates more proactive and diligent risk management behaviour*”. It anticipated that when accountability cannot be delegated, bad outcomes reflect badly on the accountable executives themselves, so they should be less likely to ignore red flags and instead seek out more risk information and evaluate it more carefully.<sup>1094</sup> Evaluation of a similar regime in the UK banking sector, introduced to hold senior management to account for failures that occurred on their watch, found that the majority of senior managers and firms which reported these had brought about positive and meaningful changes to behaviour in the industry.<sup>1095</sup> The ICO’s guidance about AI risk management regarding data protection states that senior management are accountable for addressing the technical complexities of AI, and cannot delegate this responsibility to others. It states that senior management will need to align its internal structures, roles and responsibilities maps, training requirements, policies and incentives to its overall AI governance and risk management strategy.<sup>1096</sup> Likewise, the AI Risk Management Framework by the US National Institute of Standards and Technology (NIST) states that effective risk management is realised through organisational commitment at senior levels and may require cultural change within an organisation or industry. It says that organisations need to establish and maintain the appropriate accountability

---

safety. Source: [5Rights Foundation response](#) to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1091</sup> Responses from Carnegie and the Center for Countering Digital Hate also call for senior executive responsibility, with Carnegie stating the importance of responsibility for children’s wellbeing being accepted at Board level. Source: [Carnegie response](#) and [Center for Countering Digital Hate response](#) to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1092</sup> The NSPCC said it expects to see senior managers to be held personally liable for protecting children from harm. It expects to see that governance, accountability and decision-making flow down from senior management, and that risk assessments should be signed off at the highest level. Source: [NSPCC response](#) to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1093</sup> NSPCC, 5 May 2023. [Majority of public want tougher Online Safety Bill that holds tech bosses responsible for child safety](#). [accessed 17 April 2024].

<sup>1094</sup> Note that this study has a small sample size of 41 interviews with accountable persons. Source: Elizabeth Sheedy and Dominic Canestrari-Soh, 2023. [Does executive accountability enhance risk management and risk culture?](#), *Accounting & Finance*, 63(4). [accessed 17 April 2024].

<sup>1095</sup> The Senior Managers and Certification Regime (SM&CR) for banks and insurers, launched in 2016 in the UK, requires the most senior decision-makers in firms to have clearly assigned responsibilities, and to be accountable for actions within their remit. Results from a survey of banks and insurers showed that 94% of senior managers and 96% of firms which responded reported that the SM&CR had brought about positive and meaningful changes to behaviour in industry. Source: Bank of England, 2020. [Evaluation of the Senior Managers and Certification Regime](#). [accessed 17 April 2024].

<sup>1096</sup> ICO, [What are the accountability and governance implications of AI?](#). [accessed 17 April 2024].

mechanisms, roles and responsibilities, culture, and incentive structures for risk management to be effective.<sup>1097</sup>

### Internal assurance and staff compliance training

- 7.11.15 Having an internal monitoring and assurance function in place is considered important, to provide an independent review of the measures in place that mitigate and manage the risks to children. Inappropriate risk mitigation and management evaluation processes could lead to children being exposed to harmful content. These risks may also arise where such processes are inconsistent, where measures are ineffective at addressing specific risks, or where measures are not future proof.<sup>1098</sup> For these reasons, internal monitoring assurance functions can be effective in ensuring that there is adequate oversight of risk management.
- 7.11.16 Lack of, or inadequate, staff training could also put children at risk, if staff are not appropriately trained in the service's approach to compliance with the child safety duties and the reporting and complaints duties. Regular staff compliance training is considered an important part of building and supporting a risk management culture, by ensuring staff are aware of a service's duties and how it intends to meet them.<sup>1099</sup> Without efforts to align safety objectives across different areas of a service, it is possible that staff will not understand how the service manages and mitigates risks of harmful content being displayed to children, nor how it approaches regulatory compliance.
- 7.11.17 Additional considerations may be needed to protect vulnerable children. It is important that services understand how risk factors to children's safety may change depending on certain characteristics. The United Nations General Comment 25 on the rights of the child in the digital environment highlights that certain children face an increased risk of harm, and calls for measures to prevent discrimination "*...on the basis of sex, disability, socioeconomic background, ethnic or national origin, language or any other grounds, and discrimination against minority and indigenous children, asylum-seeking, refugee and migrant children, lesbian, gay, bisexual, transgender and intersex children, children who are victims and survivors of trafficking or sexual exploitation, children in alternative care, children deprived of liberty and children in other vulnerable situations*". The comment also notes a specific gender digital divide for girls.<sup>1100</sup> Research commissioned by DCMS with children aged 9-18 found that children with special educational needs and disabilities (SEND) may be more vulnerable to being targeted by online abuse. Those with learning disabilities and autism were identified as being vulnerable to seeking connections online

---

<sup>1097</sup> US National Institute of Standards and Technology (NIST), 2023. [Artificial Intelligence Risk Management Framework](#). [accessed 17 April 2024].

<sup>1098</sup> A report by Ofcom on the livestreaming of an attack in Buffalo, New York on 14 May 2022 concluded that services should make efforts in their product and engineering design processes to prevent the upload of terrorist content, in an effort to prevent similar incidents in the future. Source: Ofcom, 2022. [The Buffalo Attack: Implications for Online Safety](#).

<sup>1099</sup> Carnegie UK, for example, recommended that services have appropriately trained staff, and should have processes that can separate specific children's issues from general operating issues, and get appropriate teams involved. Source: [Carnegie UK](#) response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1100</sup> United Nations, 2021. [General comment No. 25 \(2021\) on children's rights in relation to the digital environment](#), 2 March 2021. [accessed 17 April 2024].



but not always being able to distinguish between healthy and harmful connections with others.<sup>1101</sup>

## User access

7.11.18 Effective user access<sup>1102</sup> measures can prevent child users from accessing certain online spaces, can inform services about the age of a user, in order to reduce the risk of children being exposed to harmful content, and can contribute towards a more age-appropriate experience online. Ineffective user access systems, processes and technologies can enable children to access spaces that were not designed for them. We know that some children can access services despite being below the minimum age requirement. Service providers must be able to identify if a user is a child, to ensure they have an age-appropriate experience. Further information as to how services can mitigate risk of harm can be found in our draft Children’s Safety Codes (Volume 5).

## Age assurance

7.11.19 The absence of robust age assurance systems and processes, or a strategy on how to effectively identify child users, may increase the risk of harm to children. Age assurance systems are important tools to determine users’ ages and protect children from harmful content. However, these systems are not always implemented or implemented in a robust way, resulting in children being exposed to experiences and content that are harmful to them. Children can often access online spaces and content where they encounter harm due to inexistent or ineffective methods of assuring their age.

7.11.20 When age assurance systems are weak or non-existent, children are able to easily access functionalities and content that is only appropriate for adults. Some children create online profiles with a false age, which could put them at higher risk of being exposed to harmful content online. Ofcom research found that 21% of 8-17-year-olds (and 20% of 8-15s) with a social media profile on at least one of the platforms listed in our study, had a user/profile age of at least 18, increasing the risk of them seeing content that is age-inappropriate or harmful to children.<sup>1103</sup> Another Ofcom study found that younger children with a user/profile age of 16+ or 18+ may be exposed to new features or functionalities on their social media profile, such as direct messaging from strangers, or the ability to see adult content, thereby potentially exposing them to harm online.<sup>1104</sup>

7.11.21 Children may use other strategies to bypass age assurance systems, such as VPNs and borrowed credit cards. The BBFC and Revealing Reality found that 23% of children (aged 11-17) reported knowing how to use a potential ‘workaround’ (e.g. a virtual private network (VPN), file torrenting, the use of Tor<sup>1105</sup> or the ‘dark web’). The youngest children (11-13) were the least likely to report knowing how to use any of these functions (14%), compared to the older children – 25% aged 14-15, and 33% aged 16-17.<sup>1106</sup> Ofcom

---

<sup>1101</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#). [accessed 17 April 2024]. Note: DCMS stands for the UK Government department, ‘Department for Digital, Culture, Media & Sport’. This has now been replaced by ‘Department for Science, Innovation and Technology’ (DSIT) and ‘Department for Culture, Media and Sport’ (DCMS).

<sup>1102</sup> ‘User access’ refers to a user’s entry into a service and ability to use the functionalities present on that service.

<sup>1103</sup> Ofcom, 2024. [Children’s Online ‘User Ages’](#)

<sup>1104</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>1105</sup> Tor is a software that enables anonymous web browsing.

<sup>1106</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification](#). [accessed 17 April 2024].



research found that 34% of 16-17-year-olds used a VPN when accessing pornographic content.<sup>1107</sup> Parents also reported concern about their children using their credit card without their permission to bypass age assurance measures.<sup>1108</sup>

- 7.11.22 Device-sharing between children and adults may lead to a risk of a child being recommended age-inappropriate or harmful content. Some children, particularly younger children, share their internet devices with other members of their household, such as siblings and parents.<sup>1109</sup> <sup>1110</sup> As recommender systems recommend content on the basis of the search and viewing history of the user, when a child borrows the device from an adult it is possible that they could be served age-inappropriate content, including harmful content. Further exploration of the risks recommender systems pose to children is in the ‘Service Design: Recommender Systems’ sub-section of this section.

## Content moderation

- 7.11.23 Content moderation, whether automated, human, or a combination of both, is put in place by services to identify and take action on content that is illegal or does not meet their own internal content policies. However, content moderation systems which are poorly designed, deployed or resourced may increase the risk of children encountering harmful content online.
- 7.11.24 Under the Act, services are required to prevent children from encountering primary priority content (PPC) that is harmful to children, and to protect children in relevant age groups from priority content (PC) and non-designated content (NDC).<sup>1111</sup> This means that services need to include these categories of content in their internal content moderation policies, work to identify this content, and take the appropriate action to prevent or protect children from harm, depending on the content category. Their content moderation teams need to be appropriately resourced and trained to undertake these tasks. Further information as to how services can implement content moderation effectively can be found in our draft Children’s Safety Codes (Volume 5).

## Ineffective content moderation

- 7.11.25 Ineffective content moderation technology and strategy could result in children being exposed to harmful content. Services with less stringent moderation may be seen by users as preferred spaces for content or discussions on topics that are harmful to children. Discussion forums and user groups are often perceived to be less moderated,

---

<sup>1107</sup> Ofcom, 2023. [Barriers to proving age on adult sites](#).

<sup>1108</sup> BBFC and Revealing Reality, 2020, [Young people, Pornography & Age-verification](#). [accessed 17 April 2024].

<sup>1109</sup> We know from our longitudinal qualitative *Media Lives* studies that it is common for children, particularly younger children, to share devices with others in their household. For example, one of the participants, Amira (12) tells us she shares her online devices with her sibling. Source: Ofcom, 2023. [Children’s Media Lives](#).

<sup>1110</sup> We know from our quantitative media literacy research that children share devices for homework or online schooling. 34% of primary and secondary school children do not have access to appropriate internet devices for their schooling needs at home all the time. When these children need access, most parents of these children (55%) reported that this was managed by the child sharing devices with others in the household. Source: Ofcom, 2023. [Adults’ Media Literacy Tracker](#). (Q09, Q010, Q011).

<sup>1111</sup> Section 12(3) of the [Online Safety Act](#) states that we must prevent children from encountering primary priority content that is harmful to them, and protect children in age groups judged to be at risk of harm from other content that is harmful to children.

and so are perceived to be easier to find in order to access the harmful content.<sup>1112</sup> Beat described how an online forum, which had almost half a million users, appeared to be a supportive community for those living with an eating disorder, but was actually a site populated by predominately pro-eating disorder discussions, providing encouragement and instructions for continued weight loss.<sup>1113</sup> In one study, a child (aged 16) referred to a community of social media users, within which pornographic content was sometimes posted and shared, and where photos and videos were available without any restrictions, beyond a warning that the media might contain graphic imagery.<sup>1114</sup> A report by the Molly Rose Foundation found that “inconsistent and at times erratic” content moderation undermined the harm reduction strategies of three popular services.<sup>1115</sup>

- 7.11.26 Users can use coded hashtags to disguise content on services, which can lead to risk of harm to children if moderation systems are not sophisticated enough. Coded content tags<sup>1116</sup> can be used to obscure and disguise harmful content in an attempt to bypass content moderation systems and be disseminated by recommender systems. The use of coded hashtags in this way can risk creating spaces where harmful content can proliferate for extended periods without detection by online services. Research commissioned by DCMS reported how children and young adults aged 9-18 described body-image and eating disorder content as ‘easy to find’ using well-known coded hashtags, which led users to posts promoting anorexia and other disordered eating.<sup>1117</sup> Ofcom research reported how knowledge of the coded hashtags appeared to spread in eating disorder online communities.<sup>1118</sup>
- 7.11.27 Services that rely solely on community moderation may present risk of harm. Evidence suggests that children are present on, and encounter harmful content on, services that employ community moderation as a form of content moderation. Ofcom research found that one of the four pathways to encountering PPC is through ‘groups’ and ‘communities’, with reference to Reddit, a platform on which children said they encountered such content. We heard from children that discussion forums on sites such as Reddit would form around a particular issue or celebrity, and content was shared within a ‘subreddit’.

---

<sup>1112</sup> Some evidence suggests that harmful self-harm and suicide content may be shared within online communities that form in dedicated sub-groups within more general discussion services. These are sometimes reported to be self-regulating, with little perceived outside moderation, and so are perceived to be easier to find in order to access the harmful content. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>1113</sup> Beat response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation.](#)

<sup>1114</sup> BBFC and Revealing Reality, 2020. [Young people, Pornography & Age-verification.](#) [accessed 17 April 2024].

<sup>1115</sup> Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest.](#) [accessed 17 April 2024].

<sup>1116</sup> Content tagging is the process of adding keywords and phrases to user-generated content, often used to describe its subject, topic, or theme. Tags such as hashtags are normally applied by users themselves to help improve the discoverability of their content by other users. Users, including children, can undermine content moderation systems when they adapt hashtags or keywords of commonly used terms so that the harmful content is less likely to be flagged as harmful by services.

<sup>1117</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children.](#) [accessed 17 April 2024].

<sup>1118</sup> Ofcom, 2024. [Online Content: Qualitative Research Experiences of children encountering online content relating to eating disorders, self-harm and suicide.](#)

They described these subreddits as being ‘self-regulating’ forums with little perceived outside moderation, other than the community moderation.<sup>1119</sup>

- 7.11.28 Some services may be less incentivised to detect and moderate content. Services that generate revenue in proportion to the number of users and/or user engagement (e.g. advertising revenue models) may be less incentivised to detect and moderate content that is harmful to children, if this drives up engagement and in turn increases revenue. It may be resource-intensive for services to distinguish between harmful content and other, non-harmful content which resembles harmful content (e.g. content discussing eating disorders but promoting recovery).<sup>1120</sup> Services therefore may not have sufficient incentive to take prompt action against content that could be harmful to children, especially if the risk of over-blocking content (where content that is not harmful, but is blocked because it resembles harmful content) could reduce user engagement and/or the number of users, and therefore reduce revenue.<sup>1121</sup>

### Resourcing and time constraints

- 7.11.29 Resource constraints on content moderation teams could lead to harmful content remaining on a service for a longer time. An Ofcom report noted that in services' content moderation processes there is typically a time-lag between content being referred and it being reviewed, due to resource constraints, and the potentially large and fluctuating volume of potentially harmful content referred.<sup>1122</sup> As discussed in the User Reporting and Complaints sub-section of this section, we know that long wait times discourage children from reporting harmful content. Likewise, Refuge told us that users are left waiting ‘weeks, months or even years’ for a reply after flagging seriously harmful content, and that urgent steps need to be taken to improve response time. Refuge told us that where content moderation functions are adequately resourced, this should enable them to review potentially content harmful to children more quickly, and make more accurate decisions on whether to take action.<sup>1123</sup> A study has suggested that the reduction of content moderation staff in a large service has led to a major increase in the quantity of antisemitic content on the service.<sup>1124</sup>

---

<sup>1119</sup> When describing subreddits on Reddit, one 14-year-old male participant explained, “it’s very much tailored to you, so if you wanted to go out and look for it [suicide, self-harm and eating disorder content] you can find it. Unlike YouTube, which are sometimes good at their job of trying to moderate, Reddit isn’t as moderated.”

Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>1120</sup> This is the case for harmful content that is intentionally tagged by users (i.e. using hashtags) or unintentionally labelled by the system as non-harmful content. We refer to eating disorder as an illustrative example, but a similar argument can apply to other types of content, such as suicide and self-harm content tagged as pro-recovery content, and mis-labelled violent content (see the Suicide and self-harm and Violent content sections (sections 7.2 and 7.6) within this volume for more information).

<sup>1121</sup> Other measures aimed at reducing harm, such as age assurance or additional checks/restrictions on content posting/sharing, could also add friction to the user experience, which may also be to the detriment of user engagement and revenue.

<sup>1122</sup> Ofcom, 2023, [Content Moderation in user-to-user online services.](#)

<sup>1123</sup> [Refuge](#) response to 2023 [Ofcom Call for Evidence: Second phase of online safety regulation.](#)

<sup>1124</sup> A report by CASM Technology and ISD found a major increase in the number of antisemitic posts, coinciding with a reduction in content moderation staff at one social media service, saying the analysis demonstrates “the broader and longer-term impact that platforms de-prioritising content moderation can have on the spread of online hate.” While this study refers to antisemitic content, our view is that it is reasonable to infer a similar outcome for content harmful to children in terms of hate and abuse. Note: On its methodology,

- 7.11.30 Time pressures on human moderators may increase the risk of human error in moderation decisions. A report by Demos highlighted that human content moderators have to make decisions in minutes, often about content in a language or a context they do not understand, making mistakes inevitable.<sup>1125</sup> Periods when there is no human moderator presence on services may increase the risk that content harmful to children is widely viewed by, or disseminated to, children before being actioned, which can lead to more children encountering such content.<sup>1126</sup>
- 7.11.31 It is important to have processes in place to prepare content moderators for times of crisis. As part of our VSP regulation, we found that only some VSP providers provide detailed guidance on what to do in a crisis situation. Our report on the 2022 Buffalo Attack highlighted the importance of VSPs having appropriate moderation measures and internal processes in place to respond quickly to crisis events as they arise. We considered that content moderators who have access to high-quality resources will be better equipped to identify harmful content quickly, consistently and accurately.<sup>1127</sup>
- 7.11.32 Inadequate training on quality assurance can lead to an uneven application of moderation standards. As part of our video-sharing platform (VSP) regulation, we said that although most of the regulated services we examined did have training materials for content moderators in place, including definitions of prohibited content, it is also important to build up moderators’ awareness of the cultural, linguistic, historical, and political context in the UK, to help them protect UK users.<sup>1128</sup>

## User reporting and complaints

- 7.11.33 Services have duties to operate reporting and complaints processes under the Act and may also use these to mitigate the risks of harms discussed in the Register. However, not all children are aware of these functions, and those that are aware are unlikely to use them if they are lengthy or unclear, or hard to find. These functions may not have been designed with children in mind, yet children need to be able to use them if they are using a service. Services should consider this when assessing risk on their own platforms.
- 7.11.34 While reporting mechanisms, if used by a child, can prevent the further spread of content that is harmful to children, the child in question will have already encountered that piece of content and potentially been harmed by it. Further information as to how services can implement reporting and complaints processes effectively, and mitigate risk of harm, can be found in the draft Children’s Safety Codes (Volume 5).

---

the report comments there are ‘inherent challenges in training language models on as nuanced a topic as antisemitism, but this architecture is evaluated to operate with an accuracy of 76%. Source: CASM Technology and the Institute for Strategic Dialogue (ISD), 2023. [Antisemitism on Twitter Before and After Elon Musk’s Acquisition](#). [accessed 17 April 2024].

<sup>1125</sup> Demos (Krasodowski-Jones, A.), 2020. [Everything in Moderation: Platforms, communities and users in a healthy online environment](#). [accessed 17 April 2024].

<sup>1126</sup> Ofcom, 2022. [The Buffalo Attack: Implications for Online Safety](#).

<sup>1127</sup> Ofcom, 2022. [Ofcom’s first year of video-sharing platform regulation](#).

<sup>1128</sup> Ofcom, 2023. [Regulating Video-Sharing Platforms \(VSPs\). Our first 2023 report: What we’ve learnt about VSPs’ user policies](#).

## Accessibility of reporting channels

- 7.11.35 Children in particular do not report or complain about harmful content if the reporting channels are unclear or hard to find, or if the process is too time-consuming or complicated. Evidence suggests that children are put off complaining or reporting because they don't know how to complain, or believe it will be difficult.<sup>1129</sup> Children told us in our cyberbullying study, and our research on reporting behaviours and attitudes in children, that reporting mechanisms should be more visible, and that having to answer multiple follow-up questions when reporting is burdensome.<sup>1130 1131</sup> Similarly, another of our studies on violent content found that children were discouraged from reporting because the processes are long, time-consuming and complicated.<sup>1132</sup> This view was echoed by participants in our research on suicide, self-harm and eating disorder content, who said 'not knowing how to report' made them more likely to block harmful content than to report it.<sup>1133</sup> There is a greater risk of more children encountering harmful content if they struggle to report/complain, increasing the likelihood of harm to more children who may then come across it or be subject to repeated exposure.
- 7.11.36 Children are less likely than adults to report or flag content. When looking at PPC and PC harms, children aged 13-17 are less likely than adults to report or flag content online (24% vs 35%).<sup>1134</sup> Older children (aged 13-15 and 16-17) are less likely to tell someone if they have seen something worrying or nasty online, compared to younger children (aged 8-12).<sup>1135</sup>
- 7.11.37 Our research suggests that children are more likely to block or restrict users or content than to report it. This may be because blocking and content restrictions have clearer outcomes. We found that children aged 13-17 were less aware of reporting functions (37%) than other protection measures on social media such as blocking (83%).<sup>1136</sup>
- 7.11.38 However, other sources show that some children are not aware of blocking and reporting functions on the services they use. Some children have reflected in interviews and focus groups on how they were not aware of reporting and blocking functions when they were younger.<sup>1137</sup> Ofcom research found that over half (54%) of parents said they wanted flagging and reporting mechanisms to be made easier for children to use and access.<sup>1138</sup>

---

<sup>1129</sup> Many children do not know how to use reporting systems or find them difficult to use. Ofcom, 2023, Children's Media Use and Attitudes study: [Children's Online Knowledge and Understanding Survey, QC57](#)

<sup>1130</sup> Ofcom, 2024. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>1131</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1132</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>1133</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>1134</sup> Ofcom, 2023. [Online Experiences Tracker](#), Wave 4. Note: Potential harm refers to Primary Priority and Priority Content (PPC/PC) as noted in the Wave 4 [Technical Report](#).

<sup>1135</sup> Ofcom, 2023. Children's Media Use and Attitudes study: [Children's Online Knowledge and Understanding Survey, QC31A](#).

<sup>1136</sup> Ofcom, 2023. Children's Media Use and Attitudes study: [Children's Online Knowledge and Understanding Survey, QC57](#).

<sup>1137</sup> Some children (aged 9-18) reported in interviews and focus groups that they self-managed inappropriate sexual content and pornography by blocking or avoiding the material, but not all children were aware of blocking and reporting functions. Some participants explained that they had learnt to identify suspicious contacts and felt more confident in declining requests as a result of previous negative online experiences. Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 17 April 2024].

<sup>1138</sup> Ofcom, 2023. [Video Sharing Platforms \(VSP\) Tracker](#).

- 7.11.39 Children may be discouraged from reporting content due to anonymity concerns. Ofcom research found that some children are discouraged from reporting by concerns about confidentiality – whether the person they are complaining about will find out who made the complaint. We found that children were discouraged from reporting as they lacked trust that the reporting system would be truly anonymous, believing that their details would be included as part of the report, or that other users would be able to work out who reported them.<sup>1139</sup> Concerns about anonymity during reporting were also cited in Ofcom research into reporting behaviours and attitudes in children; this was found to be a demotivating factor for children.<sup>1140</sup> Similarly, although most children in our research on suicide, self-harm and eating disorder content acknowledged that the reporting process was anonymous, they lacked confidence that this anonymity could be relied on in practice.<sup>1141</sup> This was also reflected in our cyberbullying research, in which participants emphasised the importance for children that the report would not be traced back to them and so make the bullying worse.<sup>1142</sup>
- 7.11.40 Children with limiting or impacting conditions may find reporting particularly onerous. Ofcom research found that adults aged 18+ with any limiting or impacting conditions are significantly more likely to be dissatisfied with the reporting process (62%) than those with no limiting or impacting conditions (47%).<sup>1143</sup> So if, as our evidence above suggests, children are already finding reporting difficult, it is reasonable to expect that children with specific conditions could face additional problems when trying to report or complain.
- 7.11.41 Some children may struggle to identify fake accounts. Evidence suggests that some children feel overwhelmed by the large number of fake accounts and bots they encounter online and have had to learn to become increasingly skilled in identifying and reporting them.<sup>1144</sup> Identifying fake accounts is also a struggle for many adult users, but can be particularly difficult for younger children, as highlighted in our *Children’s Media Lives* findings.<sup>1145</sup>

### Speed of action

- 7.11.42 Where users perceive a lack of action, or lack of transparency, or receive no or poor communications in response to a report,<sup>1146</sup> they are less likely to report in the future. This may further increase the risk of harm to children. Children in particular are often dissuaded from reporting content or complaining, as they do not think anything will come

<sup>1139</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>1140</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1141</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>1142</sup> Ofcom, 2024. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>1143</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1144</sup> Some children (aged 9-18) reported that when they were able to block or report fake accounts and bots, they sometimes felt overwhelmed, disheartened and disillusioned, due to the large number of such accounts. As a result, children are becoming increasingly aware of, and skilled in identifying and reporting, fake accounts and bots which share such content. Source: Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 17 April 2024].

<sup>1145</sup> Some younger children were not able to identify fake accounts in our *Children’s Media Lives* study. When presented with an image of a fictional social media profile, some younger children incorrectly thought it was the account of a real user. Source: Ofcom, 2023. [Children’s Media Lives 2023](#).

<sup>1146</sup> Less than one in five children and young people aged 13-24 (17%) take action to report potentially harmful content when they see it. Younger participants said the main reason for not reporting was that they didn’t see the need to do anything (29%), while one in five (21%) didn’t think it would make a difference. Source: Ofcom, 2023. [Online Experiences Tracker](#), Wave 4.



of their complaint.<sup>1147</sup> Our research into children’s attitudes to reporting echoes this finding, and suggests that if children receive no update on the outcome of their complaints, they do not believe they have been taken seriously.<sup>1148</sup> The participants suggested that confirmation of receipt after reporting, even if automated, is encouraging for children, instilling confidence and encouraging further reporting, knowing that the report is being handled and taken seriously. Ofcom research on violent content also found that many children reported a lack of feedback after their report, and lacked trust that platforms would impose meaningful consequences for those who had posted violent content.<sup>1149</sup> Likewise, our cyberbullying research found that children were unclear about what happened when a report was submitted. Some children suggested that services didn’t take cyberbullying seriously and would only take action if reports came from many users, multiple times.<sup>1150</sup> This was echoed by several respondents to Ofcom’s 2023 Call for Evidence, who told us that one of the reasons for the low rates of reporting among children is that they lack trust in reporting systems and do not believe anything will happen if they report content.<sup>1151 1152</sup> Respondents also told us that one of the main drivers of this perception is that frequently children do not receive any response from services when they report content, and this discourages them from reporting again in the future.<sup>1153 1154 1155</sup> Respondents also recommended that services should respond to children’s reports of harmful content,<sup>1156 1157 1158 1159</sup> with some suggesting any response should be sent within a set timeframe.<sup>1160 1161</sup>

- 7.11.43 The time taken for services to remove accounts can cause more harm to the child. In cases of online bullying, where fake accounts can be used to impersonate and torment victims, the time taken by services to remove fake accounts can be a risk to extending children’s distress about the situation. A study commissioned by DCMS reported a case in which it took a service two weeks to take down a fake account impersonating a child.<sup>1162</sup> Ofcom research on reporting behaviours and attitudes in children found that children felt

---

<sup>1147</sup> Ofcom, 2021. [Online Experiences Tracker](#).

<sup>1148</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1149</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>1150</sup> Ofcom, 2024. [Key attributes and experiences of cyberbullying among children in the UK](#).

<sup>1151</sup> Glitch, 2023. [Glitch response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1152</sup> Nexus, 2023. [Nexus response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1153</sup> Private Individual 1, 2023. [Private Individual 1 response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1154</sup> The Executive Office NI, Good Relations and TBUC Strategy, 2023. [The Executive Office NI, Good Relations and TBUC Strategy response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1155</sup> Refuge, 2023. [Refuge response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1156</sup> 5Rights, 2023. [5Rights Foundation response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1157</sup> Common Sense Media, 2023. [Common Sense Media response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1158</sup> Samaritans, 2023. [Samaritans response to 2023 Call for Evidence to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1159</sup> Center for Countering Digital Hate, 2023. [Center for Countering Digital Hate response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1160</sup> ParentZone, 2023. [ParentZone response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1161</sup> End Violence Against Women Coalition, 2023. [End Violence Against Women Coalition response, to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

<sup>1162</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 17 April 2024].



that, even where reported content and accounts were taken down by platforms, new accounts could then be used to continue to share harmful content. Children felt it was the platforms' responsibility to monitor such accounts.<sup>1163</sup> Research commissioned by DCMS with 9-18-year-olds found that having no clear resolution, and lengthy reporting processes, affected the severity, and the duration, of the harmful impact of the online abuse.<sup>1164</sup>

## Terms of service

- 7.11.44 Reading a service's terms of service<sup>1165</sup> can help the user understand the rules of use for the service. However, these terms are ineffective if they are not accessible to all users, including children. We consider that a service's terms of service should be able to be understood by children, so that they can make better-informed choices about what services to use, and how to stay safe online. It is reasonable to infer that this should reduce children's risk of being exposed to harmful content on a service. Further information as to how services can present their terms of service effectively for a child audience can be found in the draft Children's Safety Codes (Volume 5).
- 7.11.45 To be effective, a service's terms of service should be easy to read and easy to find. However, few are written with a child audience in mind. The ICO's Age Appropriate Design Code states that for terms of service to be accessible to children, they must be prominent, visible and easy to find.<sup>1166</sup> However, terms of service are often long, confusing and require advanced reading skills to understand, making them unsuitable for many users, especially children.<sup>1167 1168</sup> Ofcom found that the providers in scope of our video-sharing platform regulation do not use any techniques to improve users' engagement with their terms and conditions of use to help users understand them.<sup>1169</sup> Two-thirds (67%) of UK internet users (including 16- and 17-year-olds) say that they usually accept terms and conditions without reading them when visiting websites or

---

<sup>1163</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1164</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children.](#)

<sup>1165</sup> On defining terms of service, the Act includes duties that apply in relation to: a) U2U services' terms of service ('terms'), meaning "all documents (whatever they are called) comprising the contract for use of the service (or of part of it) by United Kingdom users" (section 236 of the Act); b) search services' publicly available statements ('statements'): search services are required to produce and make available to members of the public in the United Kingdom, a statement setting out certain information about how they operate (source: section 236 of the Act); and c) combined services, which have both functionalities, are permitted to set out what would be required in a publicly available statement in terms of service instead (section 25(2)(a) of the Act).

<sup>1166</sup> ICO, 2020. [Age appropriate design: a code of practice for online services.](#) [accessed 17 April 2024].

<sup>1167</sup> Ofcom calculated a 'reading ease' score for the terms of service of the providers in scope of our video sharing platform regulation. All but one was assessed as being "difficult to read and best understood by high-school graduates." Source: Ofcom, 2023. [Regulating video sharing platforms \(VSPs\) - Our first 2023 report: What we've learnt about VSPs' user policies.](#)

<sup>1168</sup> 5Rights for example reported that when they looked at 123 privacy policies for websites likely to be accessed by children, only 9 (7%) had a specific policy targeted at children. Source: 5Rights, 2021. [Tick to Agree - Age appropriate presentation of published terms.](#) [accessed 17 April 2024].

<sup>1169</sup> Ofcom, 2023. [Regulating video sharing platforms \(VSPs\) - Our first 2023 report: What we've learnt about VSPs' user policies](#)

apps.<sup>1170</sup> Ensuring accessibility for children with disabilities, and/or those relying on screen-reading technology, is also important.<sup>1171</sup> We consider that being able to easily access, and repeatedly visit, terms of service can help to reinforce children’s understanding of their rights and responsibilities as a service user.

## Service design: Recommender systems

- 7.11.46 Services which deploy content recommender systems<sup>1172</sup> could be at higher risk of suggesting content to children that is harmful to them. Poorly-designed recommender systems may increase the risk of children encountering content that is harmful to them on U2U or search services. Children may be recommended content on a U2U service, or be led to it within a few clicks, from their initial request on a search service. Detail on how recommender systems work is set out in our Wider context for understanding risk factors section (Section 7.14). Further information on how services can design and implement recommender systems to mitigate risk of harm can be found in the draft Children’s Safety Codes (Volume 5).
- 7.11.47 Recommender systems are a primary means through which user-generated content is disseminated across U2U services. While these systems help users discover content that they may enjoy, without needing to seek it out, the way they are designed may risk disseminating and serving harmful content to children’s accounts without them actively seeking it out.<sup>1173 1174</sup>
- 7.11.48 Certain design choices can result in children being served content they did not intend to find. We understand that many services often choose to design their recommender systems to drive up certain engagement metrics such as watch time, user reach, number of likes, and reshares. Such design choices can affect the risk of children being exposed to content that is harmful to them.<sup>1175</sup> When harmful content is available on a service, recommender systems may serve an increasing volume of such content to a user if they engage enough with that harm category. If a user engages with ‘harm-adjacent content’ (content that has characteristics similar to harmful content), there is a risk that a recommender system may then start suggesting harmful content, often very quickly. This can happen due to the overlapping characteristics of content, such as the same tags or

---

<sup>1170</sup> Only 6% of UK internet users aged 16+ said they always read terms and conditions. Source: Ofcom, 2022. [Adults' Media Literacy Tracker](#) (table 66). And 33% of UK internet users aged 16-24 reported having ever needed to access social media terms and conditions. Source: Ofcom, 2023. [Platform Terms and Accessibility](#) (Q1).

<sup>1171</sup> Ofcom research found that 18% of internet users aged 16-24 reported having had difficulty reading information online because the content was not keyboard navigable, or was difficult to navigate using a keyboard. The same proportion reported the same difficulty because the content was not compatible, or was difficult to use, with a screen reader or screen-reading technology. Source: Ofcom, 2023. [Platform Terms and Accessibility](#) (Q6).

<sup>1172</sup> Content recommender systems are often deployed by U2U services to help users encounter content that they are likely to find engaging. They do this by curating feeds of content based on a variety of signals such as user engagement patterns and behaviour, preferences, user demographics, and location. Recommender systems will also serve content that is popular, trending, and outside the user’s normal engagement pattern.

<sup>1173</sup> Reasons for this include child users (knowingly or unknowingly) engaging with such content, for example liking it, commenting on it, or viewing it multiple times. Recommender systems receive a variety of explicit signals (likes, shares, comments) and implicit signals (viewing time and number of times viewed) from users to infer their preferences, which then influences how certain algorithms within the system curate content.

<sup>1174</sup> Ofcom, 2023. [Evaluating recommender systems in relation to illegal and harmful content](#).

<sup>1175</sup> Ofcom, 2023. [Evaluating recommender systems in relation to illegal and harmful content](#).

keywords, or the same audio. The technical challenges in distinguishing between these different types of content may increase the risk that users seeking a certain type of content may be served harmful content; for example, mental health support and recovery content may be confused with suicide and self-harm content, and diet or fitness content may be confused with eating disorder content. Moreover, engagement with content related to one type of harmful content may prompt recommender systems to suggest another type of harmful content, based on the behaviour patterns of similar users.

- 7.11.49 A common way in which children encounter harmful content is being recommended it via curated feeds and ‘For You’ pages. Ofcom research found that a third (31%) of child users aged 13-17 encountered their most recent harm by scrolling through their feed or ‘For You’ page.<sup>1176</sup> In Ofcom’s *Children’s Media Lives* study, one girl said she sometimes saw eating disorder content on her feed that was tagged ‘recovery’, but which was not about recovery.<sup>1177 1178</sup> A report by the Molly Rose Foundation commented on the speed at which a service’s recommender system identified the account’s preferences, noting that a large video-sharing platform’s For You Page “*rapidly identified our interest in suicide and self-harm related material, and we were quickly presented with a range of disturbing and potentially harmful videos.*”<sup>1179</sup>
- 7.11.50 In severe cases, children can be vulnerable to experiencing ‘rabbit holes’ of harmful content. Recommender systems use several types of algorithms (see the Wider context for understanding risk factors section (Section 7.14) in this volume) to learn about users’ preferences and to make inferences/predictions about what they are likely to find engaging, based on a variety of signals. Content-based algorithms help personalise users’ recommendations based on their engagement patterns. Repeated engagement with harmful content can result in a ‘filter bubble’,<sup>1180</sup> whereby a child’s feed is increasingly filled with a particular type of harmful content, and they are recommended fewer alternative types of content. In more severe cases, content-based algorithms can lead to

---

<sup>1176</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1177</sup> For example, in Ofcom’s *Children’s Media Lives* study, a few of the participants talked about seeing content about mental health on their TikTok For You page that they did not search for, and did not want to see. One girl, Alice, who had previously struggled with her mental health, said she sometimes saw eating disorder content on her feed that was tagged ‘recovery’, but which was not about recovery. Source: Ofcom, 2023. [Children’s Media Lives](#).

<sup>1178</sup> Another child, Arjun (aged 10), from Ofcom’s *Children’s Media Lives* Wave 8 study, recalled being on YouTube Shorts where he did not actively choose videos but scrolled through whatever was served to him. Sometimes this meant that he saw content that was age-inappropriate. In this case, he saw a video which referenced seeing your teacher on Pornhub. He had not searched for this type of content, nor did he understand its meaning. YouTube Shorts is the short-form section of YouTube, hosting reels of short-form content up to 60 seconds long. There are no age restrictions on YouTube Shorts. Source: Ofcom, 2023. [Children’s Media Lives](#).

<sup>1179</sup> Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children’s experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest](#). [accessed 17 April 2024].

<sup>1180</sup> The term ‘filter bubble’ describes the narrowing of content that is recommended to users, such that content feeds become homogenous and lack variety. Also often referred to as an ‘echo chamber.’ The term was coined by Eli Pariser in his 2011 book *The Filter Bubble: What the Internet is Hiding from You*. Source: UK Parliament, House of Commons Library, 15 January 2024, [Preventing misinformation and disinformation in online filter bubbles](#). [accessed 17 April 2024].

children being recommended streams of increasingly extreme types of the harmful content they have previously engaged with, known as the ‘rabbit-hole’ effect.<sup>1181</sup> When harmful content is repeatedly encountered by a child, this may lead the child to experience cumulative harm.

- 7.11.51 In the absence of robust age verification and assurance, recommender systems are unlikely to be able to distinguish child users from adult users. This increases the risk of children being grouped with adult users who might be engaging with harmful or age-inappropriate content. We mentioned earlier in the ‘User Access’ sub-section of this section that device-sharing between children and adults may also lead to a risk of a child being recommended age-inappropriate or harmful content.

## Service design: User support

- 7.11.52 The way U2U services are designed, in terms of the tools and functionalities available, can affect the level of risk of harm to children. Providing children with user controls and support tools can help facilitate their safe navigation of online services. We consider that giving children more control and understanding of the content they encounter can help them to make judgements about the risk of encountering harmful content. Further information on how services can implement user support tools effectively, to mitigate risk of harm, can be found in the draft Children’s Safety Codes (Volume 5).
- 7.11.53 Some children use the available tools to protect themselves online, such as blocking content or blocking accounts, although use remains low, possibly due to the reasons set out in the ‘User reporting and complaints’ sub-section. Ofcom research indicates that the users which children are blocking include those posting content harmful to children. Fourteen per cent of participants aged 13-17 had blocked, muted or unfollowed another user who had posted harmful content, compared to 13% who clicked the ‘report’ or ‘flag’ button.<sup>1182</sup> Qualitative research into children’s experiences of suicide, self-harm and eating disorder content found that children in the ‘core’ group (i.e. those who had encountered content relating to suicide, self-harm or eating disorders, but did not have lived experience of suicide ideation, self-harm or disordered eating) said they were more likely to block suicide, self-harm and eating disorder content than to report it.<sup>1183</sup> This is demonstrated in another Ofcom study which found that 12-15 year-olds who said they had seen hateful content online and had taken action in response were most likely to block the person who shared or made the comments (25%).<sup>1184</sup>
- 7.11.54 Some children use content restriction tools as another alternative to reporting to protect themselves from harmful content. Child participants in our research spoke about using tools such as word or hashtag filters, and the ‘dislike’, ‘see less’ and ‘not interested’

---

<sup>1181</sup> The term ‘rabbit hole’ describes the process of recommending ever more extreme content to users over time, which may occur as a result of users engaging with that type of content in the past. A study that examined one large service found that design choices can influence the extent to which users are led down rabbit holes, increasing user exposure to a number of harmful content types, including self-harm and eating disorders. Source: Center for Countering Digital Hate, 2022. [Deadly by Design: TikTok pushes harmful content promoting eating disorders and self-harm into young users’ feeds](#). [accessed 17 April 2024].

<sup>1182</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1183</sup> Interestingly, children with lived experiences of suicide ideation, self-harm and eating disorders recognised that reporting was a more effective way to protect other users from this content, and said they were more likely to report for this reason. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).

<sup>1184</sup> Ofcom, 2020/21. Children’s and Parents’ Media Literacy Tracker.

buttons to protect themselves from encountering suicide, self-harm and eating disorder content.<sup>1185</sup> This is echoed in another Ofcom study which found that the most common reaction among children participants was to ignore, scroll past or click ‘not interested’ when encountering upsetting, offensive or inappropriate content.<sup>1186</sup> Children often deem perceived harmful content as ‘not serious enough’ to report, and believe clicking a ‘not interested’ button will mean they will see less of that type of content in the future, although this is not always the case.<sup>1187</sup>

- 7.11.55 Services designed with functionalities enabling interaction with strangers, such as group chats and commenting on posts, could pose a risk of harm to children. On some services it is possible for children to be added to groups, chats, forums, etc. with no option to decline or accept. Children report frequently being added to groups both by people they did know and those they did not.<sup>1188 1189</sup> Research indicates that children are encountering cyberbullying within groups<sup>1190</sup> and that the use of group messaging to share violent content is common.<sup>1191</sup> Some group chats exist on encrypted messaging services where users can share harmful content without detection or moderation. Functionalities which allow users to post comments anonymously is often central to the bullying behaviour reported.<sup>1192</sup> (See the specific harms sections in this volume for more detail on the risks associated with commenting on content.) The ability of users to engage with one another on U2U services, and the sheer extent of these potential interactions, carries the risk that child users may encounter content that is harmful to children.

## Search services (including service design and search moderation)

- 7.11.56 The way in which search services are designed, and the way in which they implement moderation systems, can affect their risk of harm to children. Further information on how search services can be designed and implement moderation effectively, to mitigate risk of harm, can be found in the draft Children’s Safety Codes (Volume 5).

---

<sup>1185</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>1186</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1187</sup> Ofcom, 2024. [Research into reporting behaviours and attitudes in children](#)

<sup>1188</sup> Note: Note: The study was with 13 ‘vulnerable’ children, which here means children who when compared with national data, all lived in UK neighbourhoods that over-index on measures of deprivation, crime and socio-economic disadvantage. Most were supported by youth services and centres and several had had interactions with the police. Source: Revealing Reality, 2023. [Anti-social Media: The violent, sexual and illegal content children are viewing on one of their most popular apps.](#) [accessed 17 April 2024].

<sup>1189</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>1190</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>1191</sup> A 13-year-old participant in Ofcom research explained that after he was added by a stranger to a group chat, along with a friend, they encountered images of graphic violence. The 13-year-old added that large group chats, where violent and graphic content was shared, were relatively common among his peers and said, “I think that they should give you the option to actually accept the [group chat] invite”. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online.](#)

<sup>1192</sup> NSPCC research noted that the functionality on sites that allows users to post comments anonymously is often central to the bullying behaviour reported. A 14-year-old respondent described his experience of a video-sharing service: “users are sometimes abusive of their so-called ‘anonymity’ and use it to harass other users”. Source: NSPCC, 2017. [Net Aware Report 2017: “Freedom to express myself safely”, Exploring how young people navigate opportunities and risks in their online lives.](#) [accessed 17 April 2024].

- 7.11.57 Search services can serve as a pathway to harm by providing users, including children, with the means to easily locate and access web content which may be harmful. Search services play a key role in making online content accessible to users, including children, and in shaping users' online journeys. However, certain features and functionalities, such as predictive search, can increase the risk of children being exposed to harmful content.
- 7.11.58 Search services may not always be able to distinguish between a child or an adult user. Search services allow users to search for content without being logged in, making it difficult for them to determine whether a user is under 18, unless a user is logged in, and has self-declared or registered their correct date of birth. As a result, children can encounter a wide variety of potentially harmful content, and evidence suggests that children encounter this both unintentionally and through intentional searches. For example, Ofcom research found that as well as encountering content unintentionally, young people may actively search for content on eating disorders, self-harm, and suicide on social media platforms.<sup>1193</sup> Published research highlights the presence and accessibility of primary priority content, including pornography, and content that promotes suicide, self-harm and eating disorders, via search services, as well as evidencing the role that search services have played in some children accessing such content.<sup>1194 1195 1196 1197</sup> A more comprehensive review of the evidence can be found in the Search services, Section 7.10 of this volume.

### Predictive search functionalities

- 7.11.59 Predictive search functions<sup>1198</sup> can suggest terms that increase the risk of users encountering content that is harmful to children. Predictive search anticipates a search request based on a variety of factors (including those related to search results' ranking). If the prediction algorithm is not designed to resolve the problem of providing potentially problematic suggestions, it could serve children results that lead/direct them towards harmful results. Search services' autocomplete suggestions have the potential to help users find content that could be considered harmful; the predictive element of a search bar could suggest potential methods or instructions on how to self-harm or end one's

---

<sup>1193</sup> Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide.](#)

<sup>1194</sup> For example, results from a survey conducted by the Children's Commissioner indicated that 30% of children had reported seeing pornography 'on search engines'. Source: Children's Commissioner, 2023. ['A lot of it is actually just abuse': Young people and pornography.](#) [accessed 17 April 2024].

<sup>1195</sup> In research with UK children many respondents described their first viewing of pornography as 'accidental', including through Google searches, where many described unwittingly searching using terms such as 'sex' or 'porn' without understanding what these words meant. Source: BBFC, January 2020. [Young People, Pornography & Age-verification.](#) [accessed 17 April 2024].

<sup>1196</sup> In research for Ofcom, exploring the accessibility of various types of content promoting self-injurious behaviour via search services, the tested search queries (which were designed to return harmful content if it was encounterable) returned large volumes of content, and one in five search results were assessed as promoting self-injurious behaviour in some form. Source: Ofcom, 2024. [One Click Away: A Study on the Prevalence of Non-Suicidal Self Injury, Suicide, and Eating Disorder Content Accessible by Search Engines.](#)

<sup>1197</sup> Other sources have highlighted the role of 'online search' in enabling children to access pro-suicide and pro-eating disorder content, such as The New York Times. Source: The New York Times, 2021. [Where the despairing log on, and learn ways to die.](#) [accessed 18 April 2024].

<sup>1198</sup> Predictive search functionalities, such as Google's autocomplete and Microsoft Bing's autosuggest tool, are algorithmic features embedded within the search bar. This functionality is designed to improve the search experience by anticipating search queries based on several factors, including past user queries, user location and trends.



life.<sup>1199</sup> Samaritans recommends that autocomplete searches are reviewed on search engines, with the functionality turned off for harmful searches that relate to methods of harm, and associated equipment.<sup>1200</sup>

## Search moderation

7.11.60 Implementing effective search moderation systems or processes could allow search services to identify, and appropriately action, content that is harmful to children. To optimise the search experience of their users, many search services use an underlying search index<sup>1201</sup> and some form of search result ranking system which is intended to provide the most relevant results to a user.<sup>1202</sup> The risk of children encountering content that is harmful to them is caused by the fact that any indexed content can be presented in search results if the ranking system enables it, and can therefore be encountered by users, including children.<sup>1203</sup> This can happen unless mitigations are in place that specifically minimise the risk of content that is harmful to children from being returned in search results for children. Inconsistent or ineffective moderation on search services may return search results containing primary priority or priority harmful content in response to search requests.<sup>1204 1205</sup>

---

<sup>1199</sup> In the [Illegal Harms Register](#) within our [Illegal Harms Consultation](#), several sources of evidence are referenced demonstrating the role of autocomplete in aiding searches for types of potentially illegal content, and it is reasonable to assume that the functionality works similarly for searches of content of all types.

<sup>1200</sup> Samaritans, 2022. [Towards a suicide-safer internet](#). [accessed 17 April 2024].

<sup>1201</sup> Indexing is the process of collecting, parsing, and storing data to facilitate fast and accurate information retrieval.

<sup>1202</sup> Ranking can be seen as a foundational component that underpins all aspects of search engines because it involves scoring each item based on its predicted relevance to the user. While search services will deploy their own method to rank content, common factors that inform this process are the relevance, trustworthiness and popularity of the potential results in the index that could be returned against a query.

<sup>1203</sup> Please note that not every search service presents content to users in this way; some source their content from predetermined locations rather than an index of 'clear web' pages.

<sup>1204</sup> Findings from a study by the Molly Rose Foundation stated that while on one service [Pinterest], terms such as 'suicide' or 'self-harm' have been effectively prevented from being recommended in the search bar, "*a range of suicide and self-harm related terms continue to produce a set of auto-completed suggestions*". Note: In this study the researchers explored Instagram, TikTok, and Pinterest with avatar accounts registered as being 15-years-of-age. Content was identified and scraped using hashtags that have been frequently used to post suicide and self-harm related material. While this is a singular study and may not represent all children's experiences, it demonstrates that this type of content was available on the services at the time of the study. Source: Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest](#). [accessed 17 April 2024].

<sup>1205</sup> Ofcom qualitative research found that young people actively search for content on eating disorders, self-harm, and suicide. Active searching was carried out primarily on social media platforms. Young people were aware of codewords for PPC-related content. Although this evidence relates to U2U services, users' search intent is important to recognise, as we seek to minimise young people's exposure to harmful content on search services. Source: Ofcom, 2024. [Online Content: Qualitative Research, Experiences of children encountering online content promoting eating disorders, self-harm and suicide](#).



# 7.12 Business models and commercial profiles

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of eating disorders.**

In this section we consider how a service’s revenue model, growth strategy and commercial profile can be linked to an increased risk of children encountering harmful content online.

Our evidence indicates that the risk of harm to children related to business models originates primarily from the financial incentives that services can have to develop designs and features that drive revenue at the expense of children’s safety. For instance, services may be incentivised to maximise user engagement by making design choices that keep users on a service for longer, thereby increasing the likelihood of them encountering harmful content, or in some cases be incentivised to recommend harmful content that can be engaging to certain communities of users.

We consider how services can also prioritise the use of their resources to pursue a growth strategy (for instance increasing the user base) rather than develop systems and processes that protect children from harmful content. We also note how children can be more likely to encounter harmful content on services with certain commercial profiles (such as low-capacity or early-stage services), who may lack the technical and/or financial resources to effectively prevent children from encountering harmful content.

Research explicitly focused on the risk of harm to children from business models and commercial profiles is very limited. We welcome feedback on the dynamics linking business models and commercial profiles to increased risk of harm to children we have identified in this section, as well as responses with additional research and evidence relevant to it.

## A service’s business model (revenue model and growth strategy) and commercial profile can increase the risks of harm to children

7.12.1 As part of Ofcom’s draft Children’s Register of Risks, we must identify the characteristics of different kinds of services that are relevant to the risks of harm and assess their impact. This involves considering other aspects of a service beyond the content presented on the service. This section will assess the risk of harm to children relating to:

- **Revenue model**, i.e. how a service generates income or revenue (e.g. through advertising, subscription, transaction fees, etc.).
- **Growth strategy**, i.e. how a service plans to expand its business (e.g. through growing number of users).
- **Commercial profile**, i.e. the size of the service in terms of capacity, the stage of service maturity, and the rate of growth in relation to users and/or revenue.

7.12.2 There is limited evidence directly linking these commercial aspects to an increased risk of children encountering specific types of harmful content. Where it is available, it is detailed in the relevant harm-specific sections. This section considers more broadly the

dynamics of business models (revenue models and growth strategies) and commercial profiles, assessing how they can increase the risk of children encountering harmful content.

- 7.12.3 Services whose business model is primarily or partly focused on attracting children, or whose revenue and profitability derives primarily or partly from children, will have a user base that requires additional protections and considerations in the design of the service, to ensure users' safety. Even if not directly targeting children, certain services are popular among children, and therefore need to make similar considerations regarding the safety of children.

### Revenue models

- 7.12.4 Revenue models can create financial incentives that – intentionally or unintentionally – lead to business decisions which expose children to harmful content. As a result, different types of revenue models can increase the risk of harm to children.

- 7.12.5 Services that generate revenue in proportion to their number of users and/or user engagement (for instance, advertising revenue models<sup>1206</sup> and subscription revenue models<sup>1207</sup>) can be incentivised to develop service designs and features that maximise engagement and drive revenue at the expense of exposing child users to harmful content. The choice architecture of a service (i.e. the design of the choice environment in which a user is making decisions) can be designed to influence or manipulate users into acting in ways that serve commercial interests but may be detrimental to individual or societal interests (e.g. spending time engaging with the service, in the case of advertising revenue models).

- 7.12.6 Evidence shows that some harmful content is highly engaging among certain communities. This is the case, for example, for eating disorder content.<sup>1208</sup> Services which compete in the so-called 'attention economy' (i.e. who compete for users' limited attention/engagement) may be financially incentivised to recommend this content and/or enable its sharing (including among children) in a 'friction-free' way, as this is likely to keep users engaged and coming back to the service, and thereby increase the service's revenue.

- 7.12.7 Such content can be created by ordinary users or by content creators. Content creators typically earn money on social media from advertising, in proportion to their number of followers. This means they face similar financial incentives to services, whose revenue depends on number of users and/or user engagement, and so they can be incentivised to create harmful or extreme content, if such content drives their followers and hence their earnings. Services are then incentivised to recommend such engaging content to users (including children) to sustain their revenue. For instance, the evidence shows that hateful and misogynistic videos posted by content creators can be popular on social

---

<sup>1206</sup> Services for which advertising is a key income stream are incentivised to report to advertisers a high user base and high user time spent, as these are key to attracting advertisers to the service. Therefore, services which rely on advertising revenue models have a financial incentive to promote content that drives user engagement.

<sup>1207</sup> Subscription revenue models generate revenue in proportion to the number of paying subscribers and have the financial incentives to promote engaging content that helps attract more paying subscribers and minimise user churn.

<sup>1208</sup> Evidence shows that eating disorder communities are highly engaged online, and eating disorder content can receive many 'likes' and comments (see Section 7.3, Eating disorder content for more detail).

media and are recommended to young users without them having proactively ‘liked’ or searched for such content.<sup>1209</sup>

- 7.12.8 While evidence is limited, it is likely that children contribute to a significant share of the advertising revenues of many services. Indicative evidence published by Ofcom suggests that, on average, children in some age groups spend more time online than older adults<sup>1210</sup>, and an academic study in the US estimated that, across six major social media platforms, the 2022 annual advertising revenue associated with users aged 0-17 was nearly \$11bn.<sup>1211</sup> This suggests that children are a valuable user group for those services.
- 7.12.9 In order to sustain its revenue, a service can be financially incentivised to introduce features that can result in harmful content *repeatedly* being served to children. Services’ features and functionalities that are designed to keep users online for longer periods (e.g. infinite scroll, autoplay) and to recommend personalised content based on users’ interests (recommender systems), can amplify the dissemination of harmful content. These features are designed to maximise engagement, so once a child encounters a specific kind of harmful content that engages them, they may be more likely to encounter it again, potentially in high volumes, therefore facing the risk of cumulative harm.<sup>1212</sup>
- 7.12.10 On average, these risks may be greater for children than for adults, as children’s lower level of cognitive development makes it harder for them to resist design strategies that influence their behaviour, and therefore control the amount of time they spend online, or escape from loops of harmful content.<sup>1213</sup> Refer to Section 7.13, Features and functionalities affecting time spent using services, for more detail on this.
- 7.12.11 In the same way in which commercial incentives may favour service designs that increase the risk of harm to children, these incentives may not sufficiently support the development of systems and processes that could protect children better, because such measures may also risk reducing revenue. One example is content moderation. It may be resource-intensive for services to distinguish between harmful content and other, non-harmful content which resembles harmful content (e.g. content discussing eating disorder but which promotes recovery).<sup>1214</sup> Services may not therefore have sufficient incentive to take prompt action against content that could be harmful to children, especially if the risk of over-blocking content (where content that is not harmful is blocked because it

---

<sup>1209</sup> Note: For this experiment, news organisation The Observer set up a new account on TikTok to resemble a teenager (aged 18) to see what content the algorithm recommended. Source: Das, S., 2022. [How TikTok bombards young men with misogynistic videos](#), The Guardian, 6 August. [accessed 23 April 2024]. See Section 7.4, Abuse and hate content for more detail.

<sup>1210</sup> Ofcom Ipsos children’s passive measurement pilot study, 2023, age 8-12, UK and Ipsos, Ipsos iris Online Audience Measurement Service, May 2023, age: 15+, UK. Cited in Ofcom, 2023, [Online Nation report](#).

<sup>1211</sup> Raffoul, A. et al., 2023. [Social media platforms generate billions of dollars in revenue from U.S. youth: Findings from a simulated revenue model](#). [accessed 16 April 2024]. Due to lack of data, the authors rely on the assumption that revenue per minute of platform use is constant by age, to derive the revenue estimate.

<sup>1212</sup> Harm from repeatedly encountering harmful content or encountering harmful combinations of content.

<sup>1213</sup> Radesky, J., et al., 2020. [Digital Advertising to Children](#). [accessed 16 April 2024].

<sup>1214</sup> This is the case for harmful content that is intentionally tagged by users (i.e., using hashtags) or unintentionally labelled by the system as non-harmful content. We refer to eating disorder as an illustrative example, but a similar argument can apply to other types of content, such as suicide and self-harm content tagged as pro-recovery content, and mis-labelled violent content (see Sections 7.2 and 7.6 on Content encouraging suicide and self-harm and Violent content).

resembles harmful content) could reduce user engagement and/or number of users, and thereby revenue.<sup>1215</sup>

- 7.12.12 In addition, features that relate directly to how a service generates revenue can increase the risk that children encounter content that is harmful to them. One example is the ability for users to pay services for greater prominence of their user-generated content (e.g. boosting posts). Being promoted, such content reaches a wider audience, so could more easily be encountered by children and pose risks to them, if harmful. Another example is the way in which paid-for ads (e.g. display ads posted by companies) which relate to harmful content could increase the risk that children then encounter further harmful user-generated content on the service.<sup>1216</sup> For instance, evidence shows that children are served adverts or ‘pop-ups’ for pornography if they have previously visited adult entertainment sites (even if this was accidental), and this can increase their exposure to pornographic content,<sup>1217</sup> including to user-generated content, if children subsequently intentionally search for it on services after having seen the paid-for-ads.
- 7.12.13 On the other hand, the reputational risk of exposing children to harmful content could negatively affect a service’s revenue in the long run, potentially giving rise to some countervailing incentives. Some users may unsubscribe from, or disengage with, services where they encounter harmful content, and business customers (e.g., advertisers in advertising models<sup>1218</sup>) or the wider ecosystem (e.g., payment providers or investors<sup>1219</sup>) may put commercial pressure on them to clamp down on such content. This may sustain some incentives to have effective measures in place to protect children from harmful content.

## Growth strategies

- 7.12.14 Growth strategies can also be associated with incentives that are in tension with user safety. Service providers may be incentivised to prioritise the use of their limited financial resources for activities and strategies aimed at growing their business (for example, marketing campaigns, research and development (R&D) activities, acquiring new assets and technologies, etc.) rather than for the development or improvement of systems and processes that protect children from harmful content (content moderation and other measures).

---

<sup>1215</sup> Other measures aimed at reducing harm, such as age assurance or additional checks/restrictions on content posting/sharing, could also add friction to the user experience, which may also be to the detriment of user engagement and revenue.

<sup>1216</sup> While paid-for ads *per se* are out of scope, they are considered here by virtue of being a vector to user-generated content harmful to children.

<sup>1217</sup> Belton, E. & Hollis, V. (2016) [A review of the research on children and young people who display harmful sexual behaviour online \(HSB\)](#). [accessed 23 April 2024]. See Pornography section for more detail.

<sup>1218</sup> For example, it was reported that recent changes to Twitter’s content policies have led to a surge in harmful content on the site, and in turn, a drop in advertising revenue. Source: New York Times, 2023. [Twitter’s US Ad Sales Plunge 59% as Woes Continue](#), 5 June 2023. [accessed 16 April 2024].

<sup>1219</sup> Investors are one of the actors who may consider the risk of online harms and potentially influence the approach of services they may invest in. To help inform our understanding of risks, and how investors may influence the risk of online harms, we commissioned a report, ‘Investors Attitudes to Online Harms – Risks, Opportunities and Emerging Trends’. This report was published alongside the Illegal Harms Consultation and shows that children (along with other vulnerable users) are high on the list of investors’ online safety concerns, with some investors saying they would not invest in anything that could be risky for children. Source: Ofcom, 2023. [Investors Attitudes to Online Harms – Risks, Opportunities, and Emerging Trends](#), p.15.

- 7.12.15 This is true especially if such systems and processes could negatively affect their growth. For instance, services whose growth strategy is aimed at increasing the user base can have a disincentive to moderate legal content that is harmful to children if it attracts a large number of new users quickly.
- 7.12.16 Among services that pursue growth strategies, new tech services or services which seek growth through the adoption of emerging technologies (e.g. generative artificial intelligence) may present a particularly high risk to children. Evidence shows that children are often early adopters of new technologies,<sup>1220</sup> and therefore such services could – intentionally or unintentionally – attract large numbers of child users, who might then be affected by any harmful content encountered, unless appropriate mitigations are put in place.

### Commercial profiles

- 7.12.17 A service’s commercial profile can affect the risks faced by children. Some commercial profiles can be characterised by weak risk management and could lack the ability to prevent children from encountering harmful content. For instance, all else equal:
- Low-capacity<sup>1221</sup> and early-stage<sup>1222</sup> services are likely to have limited technical skills and financial resources to introduce effective risk management compared to more mainstream services. For instance, they may have insufficient resources to adopt technically advanced automated content moderation processes (e.g. automated content classifiers), or to employ a large number of paid moderators, and may rely significantly on community moderators instead. In addition, they are likely to seek growth, which may affect their incentives to have effective risk management in place, as explained above.
  - Services with a fast-growing user base may face difficulties in effectively moderating content, given the increased scale and sophistication of the moderation technologies and processes required to keep track of the user base (since the sources of risk, and kinds of harms on the service, can change quickly as the user base develops).
- 7.12.18 On the other hand, businesses with a more mature profile are likely to have larger user bases and can hence be targeted by bad actors looking to reach large populations of users, including children, with harmful content. For example, there are accounts dedicated to sharing violent content, often on larger social media and video-sharing services (see Section 7.6 on Violent content and Section 7.14, Wider context for understanding risk factors to children, for a broader discussion of how a service’s user base size can affect risk). Such services can therefore present higher risks, even when they have significant resources devoted to risk management, unless appropriate systems and processes are in place to protect children.

---

<sup>1220</sup> See ‘Overview of child behaviours’ in Section 7, Introduction to the draft Children’s Register of Risks.

<sup>1221</sup> Services with a small number of employees and/or limited revenue.

<sup>1222</sup> A service in the initial phases of its lifecycle (e.g., start-up and early growth stages).

## 7.13 Features and functionalities affecting time spent using services

**Warning: this section contains references to content that may be upsetting or distressing, including discussion of suicide and self-harm.**

This section assesses evidence relating to the risk of harm to children from features and functionalities affecting time spent using services.

As part of their children’s risk assessments, the Online Safety Act 2023 (‘the Act’) requires services to consider the extent to which the features and functionalities on their service affect the risk of harm to children, by influencing how much children use the service.<sup>1223</sup> Risk of harm is defined as risk of encountering content harmful to children, including Primary Priority Content, Priority Content and Non-Designated Content.<sup>1224</sup>

Evidence suggests that the greater the time spent on services by a child, the higher the risk of encountering any harmful content that may be present on that service.

Some service features and functionalities are designed to influence certain behavioural outcomes, such as high usage or specific kinds of engagement. Children may be particularly vulnerable to being influenced in this way.

We have identified three categories of features and functionalities that our evidence indicates can increase the time that children use services, and may increase the risk of encountering harmful content as a result.

**Infinite scrolling and auto-play features** remove cues to disengage, providing a seemingly endless stream of content to child users. Evidence suggests that it is common for children to encounter harmful content when scrolling recommended feeds. **Affirmation based functionalities** include reacting to content, commenting as well as forming user connections. These can deliver psychological rewards that are likely to keep users returning to a service, in pursuit of further social validation. **Alerts and notifications** re-engage users, and have been shown in some cases to redirect children to harmful content.

### Considering time spent using services

---

- 7.13.1 Many features and functionalities on online services are designed to increase the time spent on that service by users, including children. This can involve encouraging users to visit a service, holding their attention on the service as long as possible, and encouraging the habitual behaviours necessary to keep users returning to a service.
- 7.13.2 We do not consider any level of use, or any feature or functionality, as inherently harmful. The features and functionalities we assess may in some cases be encouraging children to

---

<sup>1223</sup> Sections 11(6) and 28(5) of the Act.

<sup>1224</sup> Kinds of harmful content are outlined in the Introduction to Register (Section 7).

engage in positive experiences online, accessing connections, communities and entertainment that might otherwise be unavailable to them. In Ofcom research, children aged 8-17 who used social media and messaging sites were positive about doing so. They were more likely than not, to say that using these sorts of sites or apps makes them happy all or most of the time (67%), and say that it helps them feel closer to their friends (68%).<sup>1225</sup> Internet Matters research with children aged 9-15 and their parents found that active users were more likely to encounter harm online, but also experienced more positives across all the dimensions of wellbeing – developmental, emotional, physical and social – compared with their less active counterparts.<sup>1226</sup>

7.13.3 Moreover, we understand that these features and functionalities can be fundamental to how services operate, and a significant source of revenue for services in proportion to their number of users and/or user engagement. This might include encouraging users to spend money on a particular service, or in the case of advertising-based business models, simply spend time engaging with a particular service while being exposed to ads.<sup>1227</sup> Refer also to ‘Business models and commercial profiles’ (see Section 7.12) for wider discussion on how business models relate to risk of harm.

7.13.4 However, in maximising their revenues, services may not adequately consider how these features and functionalities may increase the risk of harm to users, and in particular, children. Evidence specifically linking features and functionalities affecting time spent on services with encounters with harmful content is limited. However, there is evidence to suggest that:

- a) high usage of services increases the risk of encountering harmful content; and
- b) certain features and functionalities are likely to increase children’s usage of services.

7.13.5 In this section, we consider this evidence together to infer that, while harmful content remains accessible to children on services, the features and functionalities that encourage high usage of services increase the risk of children encountering harmful content.

7.13.6 Features and functionalities which affect time spent on services should be understood in the context of choice architecture i.e. the design of the choice environment in which a user is making choices.<sup>1228</sup> The design of features and functionalities often draws on behavioural science to influence certain behavioural outcomes. The choice architecture can be designed to influence or even mislead or manipulate users into acting in ways that serve commercial interests but may be detrimental to individual or societal interests in some cases.<sup>1229</sup>

---

<sup>1225</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#).

<sup>1226</sup> Internet Matters, 2023. [Children’s Wellbeing in a Digital World](#). [accessed 22 April 2024].

<sup>1227</sup> Refer also to Business models and commercial profiles (Section 7.12) for wider discussion on how business models relate to risk of harm.

<sup>1228</sup> Online choice architecture describes the environment in which users act and make decisions, including the presentation and placement of choices and the design of interfaces. Source: UK Government. 2022. [Evidence review of the Online Choice Architecture and consumer and competition harm](#). 5 April 2022. [accessed 24 April 2024].

<sup>1229</sup> Full quote: According to the OECD, “*dark commercial patterns are business practices employing elements of digital choice architecture, in particular in online user interfaces, that subvert or impair consumer autonomy, decision-making or choice. They often deceive, coerce or manipulate consumers and are likely to cause direct or indirect consumer detriment in various ways, though it may be difficult or impossible to measure such detriment in many instances*”. Source: OECD, 2022. [Dark commercial patterns](#). [accessed 22 April 2024].



- 7.13.7 Design features that are likely to encourage high usage are widely found on products and services popular among children.<sup>1230</sup> Children may be particularly vulnerable to being influenced by these features, and are more likely to lack the full cognitive abilities to discern, or resist, such manipulations.<sup>1231</sup> The impact of these techniques on children may vary for children in different age groups.<sup>1232</sup>
- 7.13.8 Indeed, evidence suggests that children feel manipulated by the design of digital services, and struggle to control their usage as they would like. 43% of children (8-15) have tried to reduce time online across services, stated reasons include concerns around physical and mental health. While most (75%) of those who attempted to reduce time online were successful in spending less time on apps and services, 25% were not.<sup>1233</sup>
- 7.13.9 Below we set out the evidence relating to high usage of services to the risk of encountering harmful content. We then provide our assessment of specific features and functionalities that our evidence base suggests may pose a risk to children in this way.

## High usage increases the risk of encountering harmful content

- 7.13.10 Evidence suggests that more time spent using online services increases the risk of children encountering harmful content. High usage is particularly relevant to cumulative harm, in which children repeatedly encounter harmful content in high volumes and at high intensity, or encounter harmful combinations of content. Refer to ‘Harm’ in the Introduction to this volume (see Section 7) for more detail.
- 7.13.11 Ofcom research in 2023 found that children who spent more hours online in a ‘typical’ week were more likely to report encountering harmful content. Sixty-seven per cent of ‘high usage’ respondents, and 61% of ‘medium usage’ respondents aged 13-17 reported encountering harmful content over a four-week period, compared to 37% of ‘low usage’ respondents.<sup>1234</sup>
- 7.13.12 Similarly, a study by Internet Matters found that the more time children reported spending online and on social media, the greater the number of negative experiences they reported having. Twenty-two per cent of the quartile of children aged 9-15 who were spending the most time online experienced five or more potential harms online,<sup>1235</sup> compared to 2% of the children spending the least time on social media. High usage increased the likelihood of several harms represented by types of harmful content

---

<sup>1230</sup> For examples, 5Rights sets out a taxonomy of the most commonly used design strategies to influence behaviour on products and services popular among children. Source: 5Rights, 2023. [Disrupted Childhood: The cost of persuasive design](#). [accessed 16 April 2024]

<sup>1231</sup> M.R. Leiser, Amsterdam Law and Technology Institute, 2023. [Protecting Children from Dark Patterns and Deceptive Design](#). [accessed 16 April 2024]. See more information on child behavioural stages in the Recommended Age Groups section (Section 7.15).

<sup>1232</sup> 5Rights Foundation, 2023. [Digital Childhood: Addressing childhood development milestones in the digital environment](#). [accessed 16 April 2024]. See more information on child behavioural stages in the Recommended age groups section (Section 7.15).

<sup>1233</sup> Ofcom, 2024. [Children’s media use and attitudes report](#)

<sup>1234</sup> Note: Low usage is ‘none’ or ‘less than 6 hours’; medium is ‘6-11 hours’ or ‘11-22 hours’; high usage is ‘22 to 30 hours’ or ‘over 30 hours’. Harm definition: PPC/PC harms. All in data tables. Source: Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1235</sup> Potential online harms ranged from slightly less severe incidents such as ‘seeing things you thought might not be true’ to much more potentially harmful events such as viewing content showing violence, experiencing interactions that were hurtful and bullying, and seeing racist, sexist and homophobic content. Source: Internet Matters 2023. [Children’s Wellbeing in a Digital World Index](#). [accessed 16 April 2024].

defined in the Act, including seeing violent content, experiencing bullying, receiving abusive messages from people they know in real life, and receiving abusive or upsetting messages or comments from people they don't know.<sup>1236</sup> A US study with 14-19 year-olds found that those who spent three or more hours a day online were 2.4 times more likely than those who spent less than three hours a day online to report seeing hate messages (a type of harmful content), either on a website or on social media.<sup>1237</sup>

## Risk of harm from specific features and functionalities

---

7.13.13 In this section, we review the evidence relating to specific features and functionalities that are likely to increase time spent online, and therefore increase the risk of children encountering harmful content. These features and functionalities may not necessarily lead to high usage individually, but often work together to encourage higher use.

### 'Infinite scrolling' and auto-play features

7.13.14 Certain features and functionalities are designed to avoid interruptions or prompts to end the consumption of online content. Content is often served to users via feeds, which encourage a behaviour often referred to as 'infinite scrolling' in which users scroll through seemingly endless content. Auto-play features similarly remove any cues to disengage. These involve videos playing automatically as users scroll through content, or new content playing automatically, immediately, or soon after, another video finishes. The ability for these features to maintain children's attention is related to the design of recommender systems which inform the choice of content served on feeds or via auto-play. Recommender systems draw on a variety of factors, including user preferences, history, location, and popularity of content, to recommend content most likely to be engaging to the user. Refer to 'Risk of harm from Recommender Systems' in the Wider context for understanding risk factors section (Section 7.14) for more detail.

7.13.15 Both these functionalities can benefit users by delivering a seamless experience, while helping them find content which is interesting and relevant to them. However, they can also influence and manipulate behaviour, specifically making it harder to disengage and therefore increasing time spent on a service.<sup>1238</sup> As discussed above, high usage increases the risk of encountering harmful content.

7.13.16 Moreover, evidence suggests that children are particularly likely to encounter harmful content via their feeds. Ofcom research found that exposure to online harm is more likely to take place when internet users scroll through their feed or 'for you' page, with 31% of 13-17s who had encountered harm said their most recent exposure was via this functionality.<sup>1239</sup> This is likely to be associated to the risk of harm from recommender systems. Across harmful content types, there is evidence of children being repeatedly recommended harmful content after engaging with related topics, or even being

---

<sup>1236</sup> Internet Matters, 2023. [Children's Wellbeing in a Digital World Index](#). [accessed 16 April 2024].

<sup>1237</sup> Nigel Harriman, Neil Shortland, Max Su, Tyler Cote, Marcia A. Testa and Elena Savoia, 2020. [Youth Exposure to Hate in the Online Space: An Exploratory Analysis](#). [accessed 16 April 2024].

<sup>1238</sup> Action for Children, 2021. [Social media and mental health: the good, the bad and the ugly](#), 29 December 2021. [accessed 16 April 2024]. Note: [See more information on child behavioural stages in the Recommended Age Groups section \(Section 7.15\)](#).

<sup>1239</sup> Ofcom 2023. [Online Experiences Tracker](#). Note: Potential harm refers to Primary Priority and Priority Content (PPC/PC) as noted in the Wave 4 [Technical Report](#).

recommended harmful content without having previously engaged with any related content. Refer to sub-sections ‘Recommender systems’ in kinds of harmful content sections (Section 7.1-7.8), or sub-section ‘Recommender systems’ in Wider context for understanding risk (Section 7.14) for more detail. These features therefore risk increasing children’s use of services in ways that could lead them to harmful content.

## Affirmation-based functionalities

- 7.13.17 Some functionalities provide quantifiable affirmation from other users. Affirmation-based functionalities include reacting to content (e.g. ‘likes’) and commenting on content, or engaging in other ways (e.g. re-sharing). They may also include user connections; children can be incentivised to build a large network of connections due to the perception of popularity associated with this. This engagement, or perceived popularity, can be quantified: for example, the number of ‘likes’ a particular post receives is often publicly visible. These functionalities that drive engagement are also likely to increase time spent using services, and therefore the risk of encountering harmful content on services where it exists.
- 7.13.18 The psychological impact that these functionalities can deliver is likely to encourage children to increase their level of use. Functionalities such as receiving likes and making connections are designed to be exciting; the ‘likes’ pour in as a form of social affirmation. The dopamine ‘hit’<sup>1240</sup> of getting a ‘like’<sup>1241</sup> strongly encourages the young person to continue to behave in the ways that are most ‘liked’. These rewards are likely to keep users returning to a service, seeking further social validation (and associated dopamine ‘hits’) through accumulating likes, comments or connections. However, the 5Rights Foundation highlighted that it can also be devastating if the young person misjudges their tone, content, or timing.<sup>1242</sup>
- 7.13.19 Evidence highlights how children of certain ages can be particularly focused on seeking social affirmation. Starting around age 10, children’s brains undergo a fundamental shift that spurs them to seek social rewards, including attention and approval from their peers.<sup>1243</sup> The impact of these functionalities on time spent using services is therefore likely to be higher for children over the age of 10. Children also have increased awareness of social comparison and conformity during adolescence, with their decision-making more strongly influenced by their peers. This may also drive high usage of social media, with children trying to fit in, or avoid missing out.<sup>1244</sup> In recent Ofcom research with 8-15-year-olds, ‘fear of missing out’ was the top reason for those who struggled to reduce time online.<sup>1245</sup>
- 7.13.20 While more research is required in this area, Ofcom *Children’s Media Lives* study suggests that the apparent appeal and importance of these functionalities is likely to draw children

---

<sup>1240</sup> Dopamine is a neurotransmitter that acts as a chemical messenger on areas of the brain which includes giving feelings of pleasure, satisfaction and motivation.

<sup>1241</sup> 5Rights, 2023. [Disrupted Childhood: The cost of persuasive design](#). [accessed 16 April 2024].

<sup>1242</sup> 5Rights Foundation, 2023. [Digital Childhood: Addressing childhood development milestones in the digital environment](#). [accessed 16 April 2024].

<sup>1243</sup> The American Psychological Association (Abrams, Z), 2023. [Why young brains are especially vulnerable to social media](#). [accessed 16 April 2024].

<sup>1244</sup> Note: See more information on child behavioural stages in the Recommended age groups section (Section 7.15).

<sup>1245</sup> Ofcom, 2024. [Children’s media use and attitudes report](#)

to, and keep them using, services. These functionalities have been shown to incentivise some risky behaviours. For example, in a study with 8-17 year olds, the promise of getting likes was shown to incentivise some children to post trend-led content, even if they did not understand the trend, or what the content meant.<sup>1246</sup> In another study with 7-17 year olds, children were found to be reluctant to admit that getting validation through affirmation-based metrics was important to them, but their behaviour suggested that many paid close attention to how many likes, comments and follows they received.<sup>1247</sup>

## Alerts and notifications

- 7.13.21 Alerts and notifications are also likely to drive engagement and high usage, by drawing users' attention to messages, reactions (e.g. likes), connection requests (e.g. friends or followers) and other activity on a service. Re-engaging children and encouraging them to return to a service can increase the risk that they will encounter harmful content, or in some cases, be re-directed specifically to harmful content.
- 7.13.22 Alerts and notifications can be a fundamental part of a service, helping to alert users to messages and other activity on their profile, such as reactions, comments or suspicious activity. Some notifications are not related to a specific user's activity, but alert users to activity in their wider network on the service, or simply remind them that they have not visited the service recently. Types of notifications include:
- a) Notifications that appear within the app or website itself, once users are already using the service.
  - b) Push notifications, which alert users, usually by a pop-up or other message, whenever new content is uploaded. These are sent regardless of whether the user is using the service, or even their device. They generally appear on a device's home screen or via email.
- 7.13.23 Alerts and notifications are likely to increase the time spent on services, by seeking to re-engage users. Nearly half (46%) of 8-15-year-olds who reported trying to reduce time online across services, said they received push notifications encouraging them to use the service they were attempting to disengage from. This not only draws the child's attention to the service, but when the functionality delivers social validation, such as alerting users to a 'like', message or new connection, may also exert similar influence over children as affirmation-based features. In these contexts, alerts and notifications may be a source of dopamine that drives engagement in the service, which is likely to translate into high usage.
- 7.13.24 Moreover, evidence shows that alerts and notification can direct children back to spending time on a service, and specifically to spending time watching harmful content. In an Ofcom Call for Evidence response, the Molly Rose Foundation noted that email and push notifications can direct children to further suicide and self-harm content where the child has already engaged with such content.<sup>1248</sup> This demonstrates the risk of these functionalities causing children to return to services, even when they may be trying to avoid harmful content.

---

<sup>1246</sup> Ofcom, 2023. [Children's Media Lives](#).

<sup>1247</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>1248</sup> Molly Rose Foundation, 2023. [Molly Rose Foundation response to 2023 Ofcom Call for Evidence: Second phase of online safety regulation](#).

## 7.14 Wider context to understanding risk factors

**Warning: this section contains references to content that may be upsetting or distressing, including discussion of suicide, self-harm and sexual violence.**

Some sections in the draft Children’s Register of Risks look at the risks of harm to children for individual kinds of harmful content. However, there are some broader dynamics across different kinds of harmful content that can be drawn out as well. Some of the cross-harm considerations for risk assessments that are specified in the Online Safety Act 2023 (‘the Act’) are assessed in specific sections. These include Governance, systems and processes (Section 7.11); Business models and commercial profiles (Section 7.12), Features and functionalities affecting time spent using services (Section 7.13). In this section, we set out some additional considerations for understanding how children are presented with risks online that cut across different kinds of harmful content.

A cross-harm analysis of the risk posed by recommender systems and associated functionalities demonstrates how content recommender systems and scoring algorithms risk serving children harmful content, sometimes without them seeking it out or if they have engaged with thematically similar content. Those who do engage with harmful content can be served more of it, thereby repeatedly encountering some kinds of harmful content which can cause cumulative harm.

We also consider how the size and composition of a service’s user base affects the risk of harm. Both larger and smaller user bases can present risk of harm in different ways. Larger user bases enable harmful content to have a wider reach, while smaller services may focus on niche interests or topics that may relate to content harmful to children. Smaller services may also have fewer resources available to moderate content. We also explain that services with a high number of child users present a risk due to their vulnerable user base.

Media literacy of a service’s user base is a cross-cutting risk factor. Lower levels of media literacy, in both children and parents, may make children more vulnerable to some forms of online harm. In contrast, high levels of media literacy in children can provide advantages that may reduce the risk of repeated encounters with harmful content or contact. These include being able to manage their online identity, evaluate information or safely navigate online interactions.

Children are often early adopters of new technologies, and generative artificial intelligence (GenAI) models can present risk of harm to children. There is emerging evidence indicating that GenAI can facilitate the creation of content harmful to children, including pornography, content promoting eating disorders, and bullying content, which can be shared online and potentially encountered by children.

## Recommender systems present a risk of harm to children

---

- 7.14.1 Many services use recommender systems, which can deliver a range of benefits to users. For example, recommender systems can personalise each user's experience by helping them find content they are likely to enjoy and should be considered in the context of a service's ecosystem. However, they can also increase the risk of harm to children.
- 7.14.2 As they are a core functionality of user-to-user services, recommender systems are discussed in a number of contexts:
- a) **Risk of encountering kinds of harmful content.** The relationship between specific kinds of harmful content and recommender systems is set out in the harms-specific sections in this volume. Across nearly all kinds of harmful content,<sup>1249</sup> recommender systems emerge as a key risk factor for harm.
  - b) **Risk from cumulative harm.** Recommender systems are particularly important in the context of cumulative harm, and are responsible for children repeatedly encountering harmful content (this may be PPC, PC or NDC).<sup>1250</sup> Recommender systems may also present children with harmful combinations of content. This may be different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. For example, children may be engaging with content promoting eating disorders or behaviours associated with an eating disorder. They may, alongside this, be recommended a near-continuous stream on content relating to diet, fitness and body image more broadly. The cumulative impact of viewing these different types of content is likely to be particularly harmful to children, especially those with certain vulnerabilities such as mental health conditions.
  - c) **Risk from business models.** Recommender systems are part of a strategy for maximising engagement. Lengthening the time users are engaged with the service can increase the revenue for services, e.g. by enabling more ads to be served to users. The risks associated with advertising-based business models originate primarily from recommender system design. Refer to Section 7.12, Business models and commercial profiles within this volume for more detail.
  - d) **Risk from features and functionalities affecting frequency of use.** Recommender systems keep children using services more often, and for longer, with a continuous feed of content curated to maximise their engagement. Evidence shows that the longer children spend on services, the more likely they are to encounter harmful content. Refer to Section 7.13, Features and functionalities affecting time spent using services for more detail.
- 7.14.3 There are, however, core aspects of recommender system design and functionality that underpin these specific risks and may increase the risk that content that is harmful is widely disseminated to children. These include engagement-based recommender

---

<sup>1249</sup> Excluding bullying content.

<sup>1250</sup> Cumulative harm can occur when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. This is set out in the Introduction to the Register at Section 7.

systems, and design decisions such as using scoring algorithms and collaborative filtering. These are summarised below.

## How content recommender systems work, and why they pose a risk

- 7.14.4 Recommender systems curate and serve users content that they are likely to find engaging, based on a variety of factors and signals. While this can help users discover content that they may enjoy without needing to seek it out, it also creates a risk of exposing children to harmful content.<sup>1251</sup>
- 7.14.5 **Children can be served harmful content without seeking it:** Depending on how they are designed, recommender systems may risk disseminating and serving harmful content to children’s accounts without them actively seeking it out. The reasons for this include children (knowingly or unknowingly) engaging with such content, for example liking it, commenting on it, or viewing it multiple times. Recommender systems receive a variety of explicit signals (likes, shares, comments) and implicit signals (viewing time and number of times viewed) from users to infer their preferences, which then influence how certain algorithms within the system curate content.<sup>1252</sup>
- 7.14.6 **Children can be served harmful content if engaging with similar content:** Recommender systems may serve an increasing volume of harmful content if a certain user engages with harm ‘adjacent to’ harmful content (content that is characteristically similar to harmful content). The technical challenges in distinguishing between different types of harmful content, due to overlapping thematic characteristics and features, may increase the risk that users seeking, for example, recovery content will be recommended harmful content.
- 7.14.7 **In severe cases, children can be vulnerable to experiencing ‘rabbit holes’ of harmful content:** Repeated engagement with harmful content can result in a ‘filter bubble’, whereby a child’s feed is increasingly filled with a particular type of harmful content, and they are recommended fewer alternative types of content. This can increase the risk of cumulative harm. In some cases, content-based algorithms can eventually lead to children being recommended more harmful content associated with more severe impacts. This is known as the ‘rabbit hole’ effect. For example, evidence reports children being presented with pornographic content depicting themes of violence, having previously engaged with pornographic content. Refer to Section 8.2, Pornographic content within this volume for more detail.

---

<sup>1251</sup> Ofcom, 2023. [Evaluating recommender systems in relation to illegal and harmful content](#).

<sup>1252</sup> Content recommender systems are made up of a set of scoring algorithms that predict what content the user is most likely to engage with. Effectively, they give content a predicted engagement ‘score’ for each user, which represents the likelihood that the user will engage with the content. Based on the predicted engagement score, content will be ranked accordingly. Since scoring algorithms are responsible for curating a feed of content that the system determines a user is most likely to engage with, they can be a risk factor for children who are vulnerable to unwittingly engaging with such content. Scoring algorithms use a variety of signals, including content-based signals and user similarity signals (or collaborative filtering), to curate a personalised set of recommendations.



## How scoring algorithms work, and why they pose a risk

- 7.14.8 Content recommender systems are typically made up of a set of scoring algorithms that predict what content the user is most likely to engage with. Effectively they give content a predicted engagement score for each user, which represents the likelihood that the user will engage with the content. Based on the predicted engagement score, content will be ranked accordingly. Since scoring algorithms are responsible for curating a feed of content that the system determines a user is most likely to engage with, they can be a risk factor for children who are vulnerable to unwittingly engaging with that content; for example, by simply by clicking on it or hovering over it, or even by reporting it or posting a negative comment about it. Scoring algorithms use a variety of signals from users to curate a personalised set of recommendations.
- 7.14.9 Because of the way scoring algorithms curate content, recommender systems can suggest harmful content to a user because another, similar, user engaged with it. If the child proceeds to explicitly engage with that content by liking it or sharing it, they are likely to be sending content-based signals to the recommender system. It is important to note that depending on the specific implementation on a platform, children can unwittingly signal engagement in different ways.
- 7.14.10 There are two main signals that scoring algorithms use to learn about a user's preferences and curate recommendations accordingly:
- Content-based signals:** the more a user engages with certain types of content, the more of it they will receive. These signals could be labels or tags added by the person who created the content, or could be added later by the service, either manually or automatically (e.g. by using a separate classification algorithm to analyse the content). The signals could include features such as topic, date, author, place or origin, etc. If a person has engaged with content exhibiting X and Y features in the past, content with similar features will be scored highly.
  - User similarity** (also known as collaborative filtering): users who have similar engagement patterns (e.g. follow the same pages and watch similar content) will mutually influence each other's content recommendations. If person A and person B have a similar taste for a particular type of content, they may have the same taste in other types of content. This can result in 'user clustering' where content is scored similarly for users with shared characteristics. This can lead to children being clustered with users who exhibit harmful engagement patterns, and so increase the risk of children being exposed to harmful content, even if they have never engaged with it.

## How content tagging works, and why it poses a risk

- 7.14.11 Content tagging is the process of adding keywords and phrases to user-generated content, often used to describe its subject, topic, or theme. Tags are normally applied by users themselves to help improve the discoverability of their content by other users. A popular form of tagging is hashtags. Content tags are one of the key inputs that recommender systems use to learn about users' preferences for content. Tagging can be used to obscure and disguise harmful content, in an attempt to bypass content moderation systems, and can be disseminated by recommender systems (e.g. by using codewords or popular/trending tags). Content tags that are known to be strongly associated with harmful content can be blacklisted by services as part of their automated content moderation systems. This Automated Content Moderation tool is known as

keyword blocking, where certain terms known to be almost exclusively associated with the dissemination of illegal and harmful content are blacklisted in a service's relevant databases.

## The size and composition of a service's user base affects the risk of harm

---

### Services with larger and smaller user bases can increase the risks of harm to individuals in different ways

- 7.14.12 Services with large and small user bases pose risks to children, but often for different reasons. Large services can pose a particular risk of harm because harmful content or conduct on them can reach a large number of people, and they can sometimes attract bad actors looking to reach large populations of users, including children. For example, there are accounts dedicated to sharing violent content on larger social media and video-sharing services.<sup>1253</sup> These services are likely to have been chosen because they have larger user bases, and therefore wider reach for disseminating this content (see Section 7.6, Violent content).
- 7.14.13 Smaller services can pose a particular risk of harm because they may be more focused on niche interests or topics and can therefore present a higher risk of encountering harmful content, if these topics are likely to contain content harmful to children. Smaller services may also have fewer resources available to moderate content, and therefore present a higher risk of hosting harmful content. For example, evidence suggests that content promoting suicide and self-harm can be shared within online communities, some of which exist on smaller, more niche services. Refer to Section 7.2 and 7.3 on Suicide and self-harm content and Eating disorder content for more detail.

### The number of children on a service also affects the risk of harm

- 7.14.14 A service widely used by children indicates that the service may have a high number of vulnerable users who are at risk of harm. There is currently limited evidence relating child user base size to specific harms. However, the available evidence does demonstrate that the services most used by children are those with larger user bases, and are broadly similar to the services most commonly used by adults.<sup>1254</sup> YouTube is the most-used online platform among 3-17-year-olds (88%),<sup>1255</sup> followed by WhatsApp (57%), TikTok (54%), Snapchat (46%), Instagram (40%) and Facebook (36%).<sup>1256</sup> Without adequate measures to protect child users, this risks exposing a much larger number of children to harmful content and conduct hosted on these services, particularly as children often spend significant amounts of time on these services. Refer to 'Overview of Child behaviours' in the Introduction to the Register at Section 7 of this volume for more detail.
- 7.14.15 Some services are targeted at child users. Again, evidence is limited, but since services are targeting a vulnerable user base, it is reasonable to infer that without effective

---

<sup>1253</sup> Ofcom, 2024. [Understanding Pathways to Online Violent Content Among Children](#).

<sup>1254</sup> Ofcom, 2023. [Online Nation report](#).

<sup>1255</sup> Within this study, a 'platform' is a term for an app and site used for watching or uploading videos, viewing or producing livestreamed content, social media, and video-calling or messaging.

<sup>1256</sup> Ofcom, 2023. [Children and Parents: Media Use and Attitudes](#), [Children's Online Behaviours and Attitudes Survey](#).

protections, the risk of harm is higher on these services. Indeed, evidence shows that services targeting children can be used in the context of grooming offences (refer to the Grooming section of our [Illegal Harms Register](#) within our [Illegal Harms Consultation](#)). While grooming is an illegal harm, this example demonstrates how bad actors, looking to cause harm to children, may be drawn to services targeting children, and will therefore reach a high proportion of child users.

## Low levels of media literacy, in children and parents, are likely to increase the risk of harm

---

- 7.14.16 There is limited evidence relating media literacy to specific kinds of harmful content. We have therefore compiled available evidence here, to provide some indicative findings on how media literacy can more generally affect the risk of harm to children online.
- 7.14.17 Media literacy is the ability to use, understand, and create media and communications in various ways which can both contribute to, and limit the risk of harm.<sup>1257 1258</sup> Ofcom has specific duties relating to media literacy in the Act. We consider that child users with a strong knowledge of services and online systems and the confidence to use them adeptly, and those with a good level of critical understanding of online media, will have high levels of media literacy. Those with lower levels of media literacy may struggle to navigate the online space, tend not to have good critical understanding online, and find it hard to understand online services.
- 7.14.18 A lower level of media literacy may make child users more vulnerable to some forms of online harm. Ofcom research with 8–12-year-olds found that the participants sometimes did not understand the risks associated with using a service, such as the risk of sharing personal information, and did not fully understand security settings.<sup>1259</sup> They may lack the awareness necessary to recognise the risk of harm until it is too late; or lack knowledge about how to raise concerns about what is happening. For example, a child with low media literacy may be more likely to accept group chat invitations from people they do not know personally or join group chats containing strangers. This may in turn increase the risk of the child encountering harmful content given that violent and pornographic content can be shared in the context of group chats.<sup>1260</sup>
- 7.14.19 Evidence also suggests that children whose parents have low online media literacy may be at greater risk of encountering harmful content. Ofcom research with 7-17-year-olds found that some parents are less confident in using online services or understanding how they work, and as a result are less aware of what their children were doing on those services.<sup>1261</sup>

---

<sup>1257</sup> Ofcom is mandated to promote media literacy. Section 11 of the Communications Act 2003 [accessed 28 June 2023].

<sup>1258</sup> Ofcom, 2023. [Media literacy strategy 2023](#).

<sup>1259</sup> Ofcom 2024. [Exploring high media literacy among children aged 8-12](#).

<sup>1260</sup> See ‘Group Chats’ or ‘Group Messaging’ sub-sections within Violent content (Section 7.6) and Pornographic content (Section 7.1) in this volume.

<sup>1261</sup> One parent, who did not monitor what social media services her 10-year-old son engaged with, explained that he had encountered pornographic content, having searched for a pornographic site after seeing a video on a social media service about it. Source: Ofcom, 2022. [Research into risk factors that may lead children to harm online](#)

- 7.14.20 There is evidence to suggest that children with high media literacy have a lower risk of experiencing online harm. While there may be other factors involved, high levels of media literacy in children enables them to evaluate and manage their online identity, safely navigate online interactions, evaluate online information, consider their wellbeing, and develop strategies for protecting their personal information online,<sup>1262</sup> which may help to limit their encounters with harmful content. For example, in Ofcom research with 8-12-year-olds, children with high media literacy reported being familiar with blocking systems across social media services: they always looked for ‘the three dots’ or similar in the top corner of their screen and felt confident they would be able to carry out blocking on social media services if needed. This suggests that they would be able to protect themselves against being repeatedly sent bullying, abuse or hate content by a contact.<sup>1263</sup>
- 7.14.21 Levels of media literacy vary depending on age and gender. Ofcom research with highly media literate 8-12-year-olds suggests that within this age group, older girls (aged 11-12) demonstrated some higher media literacy knowledge and skills than both younger girls (aged 8-10), and boys (irrespective of their age). Younger girls and boys may therefore be at higher risk of encountering some kinds of harmful content, where pathways to harmful content are related to media literacy levels.<sup>1264</sup> More detail on the varying risk of harm to children in different age groups can be found in the Recommended age groups section at Section 7.15 of this volume.

## Generative artificial intelligence (GenAI)

---

- 7.14.22 This section sets out how generative artificial intelligence (GenAI) should be considered in protecting children from harmful content on user-to-user and search services. We also summarise the evidence on how GenAI presents risk of harm to children.

### GenAI in the Act

- 7.14.23 GenAI is a new form of AI that refers to machine learning models that can create new content in response to a user prompt. GenAI models can be used to produce text, images, audio, videos and code, which closely resemble the content on which the models are trained.
- 7.14.24 GenAI models can enable users to create harmful content which may fall in scope of the Act’s U2U duties where a user:
- generates harmful content using a GenAI model and shares it on a U2U service;
  - creates harmful content on a U2U-embedded GenAI chatbot, and shares this with other users on the same service; or
  - uploads a GenAI bot to a U2U service which shares harmful content with other users on the same service.
- 7.14.25 GenAI may also facilitate search and serve up search results that contain harmful content, and which may fall within scope of the Act’s search duties where:
- a search service integrates a GenAI model to augment its search engine and facilitate the delivery of search results; or

---

<sup>1262</sup> Ofcom, 2024. [Exploring high media literacy among children aged 8-12.](#)

<sup>1263</sup> Ofcom 2024. [Exploring high media literacy among children aged 8-12.](#)

<sup>1264</sup> Ofcom 2024. [Exploring high media literacy among children aged 8-12.](#)

- b) a standalone GenAI application enables the searching of more than one website or database; for example, via plug-ins.

## Risk of harm to children from GenAI

- 7.14.26 Children are early adopters of new technologies, and GenAI is no exception. Under-18s engage with many types of GenAI, including chatbots, image generators, AI avatars and stickers, as well as in search and gaming. Ofcom research found that 59% of online 7-17-year-olds said that they had used several popular GenAI services. Engagement with GenAI services was even higher for older children: 79% of 13-17-year-olds.<sup>1265</sup> Refer to ‘Overview of Child Behaviours’ in Section 7 of this volume, Introduction to the draft Children’s Register of Risks. Many regulated services are also integrating GenAI models into their services, some of which we expect to have a large number of child users.
- 7.14.27 There is evidence which shows that GenAI can facilitate the creation of content harmful to children, including pornography, content promoting eating disorders, and bullying content, which is then shared on U2U services. Evidence shows there has been a pronounced increase in the availability of AI-generated pornography online, particularly on pornography services which are dedicated to AI-generated pornography,<sup>1266</sup> and which could be accessed by children. We have found evidence showing that GenAI models can create eating disorder content, which has in some instances been shared on U2U services such as eating disorder discussion forums.<sup>1267</sup> There is also evidence of GenAI models being used to create content to bully and threaten individuals including ‘fakes’ of individual’s voices, which is shared on U2U services and could be encountered by children.<sup>1268</sup>
- 7.14.28 There is also emerging evidence indicating that GenAI models can create other kinds of harmful content which could be shared on U2U services and encountered by children. For example, audio and language GenAI models can produce racist, transphobic, violent remarks and religious biases (‘abuse and hate’)<sup>1269</sup> and engage in self-harm dialogue, even where unsolicited (‘suicide and self-harm’).<sup>1270</sup>

## Future look

- 7.14.29 Given the emerging nature of GenAI models, applications and capabilities, and how recently GenAI models have become available to UK users, we recognise that the evidence base for children’s interaction with harmful AI-generated content on U2U and search services will be limited. We are also aware that the risks associated with GenAI

---

<sup>1265</sup> Ofcom, 2023. Online research panel poll: Generative artificial intelligence. Cited in: Ofcom, 2023. [Online Nation 2023 Report](#).

<sup>1266</sup> Deeptrace, 2019. [The State of Deepfakes: Landscape, threats, and impacts](#). [accessed 25 January 2024].

<sup>1267</sup> Researchers found that users of an eating disorder forum embraced AI tools to produce low-calorie diet plans and images glorifying unrealistic body standards. Source: Center for Countering Digital Hate, 2023. [AI and Eating Disorders: How generative AI is enabling users to generate harmful eating disorder content](#) [accessed 26 January 2024].

<sup>1268</sup> Cyberbullying Research Center, 2023. [Generative AI as a Vector for Harassment and Harm](#). [accessed 12 April 2024].

<sup>1269</sup> Vice, 2023. [AI-generated voice firm clamps down after 4chan makes celebrity voices for abuse](#). [accessed 14 April 2024]; See also: Zou, J, 2021. [Persistent anti-Muslim bias in large language models](#). [accessed 14 April 2024].

<sup>1270</sup> Voicebox, 2023. [Coded companions: Young People’s Relationships With AI Chatbots](#). [accessed 14 April 2024].

models may not yet be fully known. However, given the rapid pace at which the technology is evolving, we must not underestimate the expected risks associated with GenAI for children. As new evidence emerges over the coming years, we will update this Register appropriately.

- 7.14.30 More powerful GenAI models are now being developed and released, and U2U and search services are continuing to explore new ways to integrate GenAI models into their services. This means that more GenAI-powered services and applications are likely to come within scope of the regime in future.
- 7.14.31 To help build our evidence base, Ofcom is undertaking a programme of work to understand more about the risks GenAI poses to children and is actively engaging with regulated services to explore how they are approaching safety for AI-generated content that is harmful for children.
- 7.14.32 In the Draft Children’s Safety Codes, we request further views and evidence from regulated services and other relevant stakeholders on the risks posed by GenAI to children. We also outline our future work on GenAI in more detail.

## 7.15 Recommended age groups

**Warning: this section contains references to content that may be upsetting or distressing, including references to suicide, self-harm, eating disorder and sexual violence.**

This section sets out our proposed approach to considering the risk to children in different age groups of encountering content harmful to children.

The age of a child greatly influences their online behaviour and attitudes – which can affect the risks they face online. These risks can be further influenced by broader developmental or life-stage changes, as well as changes to parental supervision of online use. Based on relevant evidence and other regulatory approaches, Ofcom proposes five age categories for understanding children’s risk of harm online: 0-5, 6-9, 10-12, 13-15 and 16-17.

In a period of significant growth and brain development, children aged 0-5 are increasingly online, with tablets the most commonly used device for this age group. Parental involvement substantially influences their online activity. Once online, children risk encountering harmful content or bad actors, especially if using devices and profiles of other family members.

When in mainstream primary education, children aged 6-9 become more independent and are nearly all online. Watching videos is the most common online activity. Parents set rules to control and manage use of services. Some children report encounters with harmful content such as pornographic content.

The age group of 10-12 brings rapid biological and social transitions. Use of mobile phones dramatically increases, with children increasingly socialising online. Some children have adult accounts using fake user ages. Direct parental supervision starts to be replaced by more passive supervision approaches. Increased online use and independence can increase the risk of having harmful interactions online like bullying.

13–15-year-olds use a wider range of services, such as livestreaming sites. They are more likely to create their own content. Parental involvement in their child’s online use decreases. Coupled with an increased vulnerability to mental health issues, children can be exposed to, and actively seek out, harmful content. The impact of harmful content, such as suicide and self-harm content, may also be heightened at this age.

Children aged 16-17 gain new legal rights and freedoms. Parents are far less involved in their children's online lives. This age group communicates extensively online, and are particularly likely to speak to people they do not know personally online. Some have 18+ user profiles, increasing the risk of encountering harmful content.

### Risk to children in different age groups

- 7.15.1 As mandated by the Online Safety Act 2023 (‘the Act’), services should consider “the level of risk of harm to children presented by different kinds of content that is harmful to children, giving separate consideration to children in different age groups”.<sup>1271</sup>

---

<sup>1271</sup> Section 11 of the Act.



- 7.15.2 As set out in Volume 2, the Act also imposes a number of safety duties requiring services likely to be accessed by children to manage and mitigate risks of harm from content that is harmful to children. This includes, in relation to user-to-user services, operating a service using proportionate systems and processes designed to: (i) prevent children of any age from encountering Primary Priority Content, and (ii) protect children in age groups judged to be at risk of harm (in the risk assessment) from encountering Priority Content and Non-designated Content.<sup>1272</sup>
- 7.15.3 Considering risk of harm by age is important to ensure that services put in place an approach to protecting child users that is proportionate and appropriate to the level of risk. Where relevant evidence is available, sections on content harmful to children in this volume will include analysis on how the risk of harm differs by age. In some areas, the specific evidence about risks of harm to particular age groups is quite limited. As our evidence base in this area develops, we will aim to reflect this in the register as appropriate.
- 7.15.4 Here we present an indicative approach to categorising child ages when considering risk from harmful online content. We recognise that no age categories are absolute, and that children can develop at different rates. However, based on evidence that shows the important changes in children’s development and online behaviour, we propose five categories: 0-5, 6-9, 10-12, 13-15 and 16-17. These categories align with the ICO Age Appropriate Design Code.<sup>1273</sup> These age groups were informed by the analysis detailed in the ‘Overview of child behaviours’ part of the Introduction to the Register (see Section 7). Any additional evidence provided by stakeholders may result in further development of these categories.
- 7.15.5 In identifying these age groups, we consider:
- a) **life stages:** How child development stages can affect risk of harm;
  - b) **online presence:** How online activities vary for different age groups;
  - c) **parental involvement:** How levels of parental supervision and use of parental controls vary for different age groups; and
  - d) **age-specific risks:** How specific kinds of content,<sup>1274</sup> and industry age limits, present distinct risks of harm for different age groups.
- 7.15.6 It is important to note that age is only one of many factors affecting risk of harmful content to children. In our draft Children’s Register of Risks, we consider how other characteristics affect the risk of harm to children. Services should pay attention to their child user groups and how the different factors intersect and may compound the risk of harm.

### Note on data sources

- 7.15.7 The majority of the evidence underpinning our age group proposals is taken from Ofcom’s long-running Children’s and Parent’s Media Literacy Tracker – an annual quantitative tracking survey running since 2005. In this study, both a child and a parent/guardian

---

<sup>1272</sup> Section 12(2) of the Act.

<sup>1273</sup> Given the close relationship between ICO and Ofcom’s area of work, using similar age groups helps to bring coherence towards data protection and online safety work. Source: ICO, 2020. [Age appropriate design: a code of practice for online services](#). [accessed 15 April 2024].

<sup>1274</sup> Several types of harmful content are specified in the Act. These include i) Primary Priority Content, ii) Priority Content, and iii) Non-Designated Content.

answer questions on the child's online use. Only children aged 8 and over are asked questions directly. Therefore, the data on children below 8 has been provided by parents only. This means that our data analysis for the age group of 6-9 year-olds is split into two different data points of 6-7-year-olds and 8-9-year-olds, due to the methodological difference. No data is collected on under-3s' online use.

- 7.15.8 Where appropriate, we have used evidence from other data sources to demonstrate the behaviours of, and risks to, children in different age groups. The age splits provided by these data sources do not necessarily match our proposed age groups but give a reasonable indication of the challenges faced by children in the groups we are proposing.

## Rationale for age groups

---

### 0-5 years: Pre-literate and early literacy

**A time of significant growth and brain development for very young children. Children of this age are heavily dependent on their parents, with parental involvement substantially influencing their online activity.**

#### *Life changes*

- 7.15.9 The first five years of a child's life see the most rapid stages of brain development, with children passing several major developmental milestones.<sup>1275</sup> By the time they start school, children's motor skills are developing to the point where they hold objects independently but require help from an adult for more complex tasks. It is likely that children of this age receive help with communication activities as their developing basic reading and writing skills are still minimal.<sup>1276</sup>

#### *Online presence*

- 7.15.10 Most children in the UK are using online services from a young age. Ofcom research found that 87% of children aged 3-5 go online.<sup>1277</sup> This is primarily for entertainment purposes; 92% of children aged 3-5 watch videos when online. Cartoons, animations, mini-movies and songs are the most popular types of videos among this age group.<sup>1278</sup> Over half of 3-5-year-olds (54%) have their own profile on the apps and websites they use.<sup>1279</sup>
- 7.15.11 Young children's presence online is increasing over time. In the past year there has been an increase in the proportion of 3-5-year-old children who use communication/messaging applications, social media sites, livestreaming sites, and who take part in online gaming, and post or share content on video-sharing platforms.<sup>1280</sup>

---

<sup>1275</sup> Boston Children's Digital Wellness Lab, n.d. [Family Digital Wellness Guide: Birth to Preschool Ages 0-5](#). [accessed 25 March 2024].

<sup>1276</sup> Ofcom, 2023. [Children's Media Use & Attitudes](#).

<sup>1277</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1278</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP5/QC4; QP8/QC7.

<sup>1279</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP20/QC20.

<sup>1280</sup> Uses apps/sites to send messages or make voice/video calls – 48% of 3-5 year old children in 2022, 54% in 2023; Uses social media apps or sites – 23% in 2022, 29% in 2023; watches live streaming apps of sites – 33% in 2022, 44% in 2023; online gaming – 21% in 2022, 27% in 2023; posts/shares contents on any video sharing platform – 11% in 2022 and 16% in 2023. Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP4/ QC3, QP5/ QC4, QP13/ QC13, QP10/ QC9, QP6/QC5

- 7.15.12 Tablets are the most commonly-used device for going online by this age group (72% of 3-5-year-olds). Phones are used to go online by 41% of 3-5-year-olds, significantly less than among those aged 8 and above.<sup>1281</sup> Some children share their internet devices with other members of their household, such as siblings and parents.<sup>1282</sup>

#### *Parental involvement*

- 7.15.13 The majority of parents of 3-5-year-olds supervise their children when online to some degree. Seventy per cent of parents of 3-5-year-olds who go online said they are nearby and regularly checking what their child does when online. Fifty-six per cent of parents of 3-5-year-olds who go online say they sit beside their child watching or helping them while they are online.<sup>1283</sup>
- 7.15.14 Parents of 3-5-year-olds use tools or controls to manage their child's access to content. Nine in ten parents (90%) of 3-5-year-olds are aware of parental tools or settings to control or manage their child's access to online content. A majority of parents of 3-5-year-olds (71%) say they use at least one type of technical tool. This includes content filters, parental control software and restricted-access versions of online services.<sup>1284</sup>

#### *Age-specific risks*

- 7.15.15 Just by being online, children in this age group are at risk of encountering harmful content. As children use devices or profiles of other family members, this may lead to a risk of encountering age-inappropriate content, including harmful content, as recommender systems recommend content on the basis of the search and viewing history of the other user(s).
- 7.15.16 The use of child-specific or restricted-age services does not guarantee that children will necessarily be protected from harmful content. It is possible that children may be more likely to use these services unsupervised. There have been cases of bad actors in the past using child-friendly formats, such as cartoons on toddler-oriented channels, to disseminate harmful content on child-specific services.<sup>1285</sup>

---

<sup>1281</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1282</sup> Ofcom's *Children's Media Lives* reports that it is common for children, particularly younger children, to share devices with others in their household. For example, one of the participants, Amira (12) tells us she shares her online devices with her sibling. Source: Ofcom, 2023. [Children's Media Lives](#).

<sup>1283</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

<sup>1284</sup> Technical tools asked about are: Content filters provided by broadband internet service provider (also known as home network filtering); Parental control software set up on a particular device used to go online (e.g. Net Nanny, McAfee Family Protection, Open DNS FamilyShield); Parental controls built into the device by the manufacturer – e.g. Windows, Apple, Xbox, PlayStation etc.; Restrict access to inappropriate online content – through tools such as Google SafeSearch, YouTube Restricted mode or TikTok Restricted mode; Apps that can be installed on a child's phone to monitor which apps they use and for how long; Change settings on a child's phone or tablet to stop apps being downloaded or stop in-app purchases; Parental control software, settings or apps that can be used on a child's phone or tablet to restrict access to content or manage their use of the device. Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP31; QP32.

<sup>1285</sup> Papadamou K., Pappasava, A., Zannettou, S., Blackburn, J., Kourtellis, N., Leontiadis, I., Stringhini, G. and Sirivianos, 2019. [Disturbed YouTube for Kids: Characterizing and Detecting Disturbing Content on YouTube](#). [accessed 9 April 2024]. Note: Ofcom understands that this is an historic issue which has now been addressed by YouTube.

## 6–9 years: Core primary school years

**After starting mainstream education, children become more independent and increasingly go online. Parents create rules to control and manage their children’s online access and exposure to content.**

### *Life changes*

7.15.17 Children at this age are increasingly independent in their media behaviour and online use. Once in primary education, children socialise with children of their own age daily and form friendships independent of their family. Motor skills become stronger at this stage, so they can carry out more complex tasks without help from an adult. Reading and writing skills also progress, allowing them to communicate more fluently.

### *Online presence*

7.15.18 Compared to younger children, children in this age group are significantly more likely to be online; 97% of 6-9-year-olds go online.<sup>1286</sup> These children are also taking part in a wider range of online activities compared to younger children. This includes watching videos online (96% of children aged 6-9) and using social media apps or services (42% of 6-7-year-olds and 54% of 8-9-year-olds).<sup>1287</sup> Nearly half of 6-7-year-olds (46%) and 57% of 8-9-year-olds play games online; double the proportion of 3-5-year-olds playing games online (27%).<sup>1288</sup>

7.15.19 6-7-year-olds’ engagement with online services is increasing over time. In the past year the proportion of 6–7-year-olds who watch video-sharing platforms, use social media sites and livestreaming services, and who game online, has increased.<sup>1289</sup>

7.15.20 Six in ten (60%) 6-7-year-olds and 64% 8-9-year-olds have their own profile set up on the apps and sites they use.<sup>1290</sup> This means that, as with 3-5-year-olds, a sizeable minority of children do not have profiles, and may be using someone else’s profile when accessing these services or using them without having an account.

7.15.21 Tablets are the device most commonly used to go online by 6-7- and 8-9-year-olds (74% and 72% respectively). The use of phones to go online increases for this age group but the use of phones to go online by 6-9-year-olds is significantly lower than 10-year-olds and over.<sup>1291</sup> Further Ofcom research has found that children often share devices with their parents, particularly for doing schoolwork.<sup>1292</sup>

---

<sup>1286</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1287</sup> Note: our data analysis for the age group of 6-9-year-olds is predominately split into two different data points, 6-7-year-olds and 8-9-year-olds, due to a methodological difference within the data collection for these ages for the Children and Parents Media Literacy Tracker.

<sup>1288</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP5/QC4; QP13/QC13; QP65; QP25/G3A

<sup>1289</sup> Watches any video-sharing platform: 93% of 6-7 year-olds in 2022, 96% in 2023; Uses social media apps or sites: 33% in 2022, 42% in 2023; watches livestreaming apps of sites: 41% in 2022, 48% in 2023; online gaming: 38% in 2022, 46% in 2023. Ofcom [Children and Parents Media Literacy Tracker](#). QP4/ QC3, QP5/ QC4, QP13/ QC13, QP10/ QC9, QP6/QC5.

<sup>1290</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP20/QC20.

<sup>1291</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1292</sup> Ofcom research finds that children share devices for homework or online schooling; 34% of primary and secondary school children do not have access to appropriate internet devices for their schooling needs at

### *Parental involvement*

- 7.15.22 Most children in this age group are supervised while online. The approach most commonly taken by parents is to be nearby and check regularly; this is done by 80% of parents of 6-7-year-olds who are online and 76% of parents of 8-9-year-olds who go online.<sup>1293</sup> Parents of children in this age group also say they are using parental control software to supervise their child's online life; 79% of parents of 6-7-year-olds and 84% of parents of 8-9-year-olds say they use at least one technical tool or control to manage their child's access to online content.<sup>1294</sup>
- 7.15.23 As children become increasingly online as they get older, parents are setting rules about what their children can and cannot do online. All parents of 8-9-year-olds who go online say they set rules about what their child does online, and how they use their mobile phone.<sup>1295</sup> These rules can include how much time they can spend online, the type of video content they watch, spending money online, and whom they can contact.

### *Age-specific risks*

- 7.15.24 Some children in this age group are starting to encounter harmful content, and this exposure has the potential for lasting impact. Research by the Children's Commissioner found that, of the children and young people surveyed who had seen pornography, one in ten had seen it by the age of 9.<sup>1296</sup> Exposure to pornography at this age carries a high risk of harm. For example, older children reflect on being deeply affected by sexual or violent content they encountered when they were younger, which may have been more extreme than they anticipated (in some cases the child had looked for the content, and other cases it had been recommended).<sup>1297</sup>
- 7.15.25 Children are also being exposed to upsetting behaviour online. Over a fifth (21%) of 8-9-year-olds reported that people had been nasty or hurtful to them, with a majority of these children experiencing this through a communication technology such as messaging or social media.<sup>1298</sup>
- 7.15.26 As with the younger age group, the use of family members' devices or profiles may lead to a risk of encountering age-inappropriate content, including harmful content. Recommender systems present content on the basis of various factors, including the profile of the user and the search and viewing history of any user(s) of that account/profile. For example, Ofcom heard from children who had been shown harmful

---

home all of the time. When these children need access, most parents (55%) reported that they managed this by the child sharing a device with others in the household. Source: Ofcom, 2023. [Adults' Media Literacy Tracker](#). (QO9, QO10, QO11).

<sup>1293</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

<sup>1294</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP32.

<sup>1295</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP26, QP59.

<sup>1296</sup> This study draws together research from focus groups with teenagers aged 13-19 and a survey of 1000 young people aged 16-21. Of the 64% who said that they had ever seen online pornography, 10% had seen it by age 9, 27% had seen it by age 11, and half had seen it by age 13. Source: Children's Commissioner, 2023. ['A lot of it is actually just abuse'- Young people and pornography](#). [accessed 14 March 2024]

<sup>1297</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research project to investigate the impact of online harms on children](#). [accessed 14 March 2024]. Note: DCMS stands for the UK Government department, 'Department for Digital, Culture, Media & Sport'. This has now been replaced by 'Department for Science, Innovation and Technology' (DSIT) and 'Department for Culture, Media and Sport' (DCMS).

<sup>1298</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QC53B, QC55.

content via an auto-play function on a social media platform when using their parent's phone and account.<sup>1299</sup>

## 10-12 years: Transition years

**A period of rapid biological and social transitions when children gain more independence and socialise more online. Direct parental supervision starts to be replaced by more passive supervision approaches.**

### *Life changes*

- 7.15.27 Children at this age experience significant developmental and situational changes. Puberty typically starts in this age range bringing about the start of adolescence. The NHS estimates that 11 is the average age for girls to start puberty and 12 for boys.<sup>1300</sup> This drives physical changes which can increase self-consciousness and body awareness. It also brings about neurobiological changes that influence cognitive development as well as the start of increased risk-taking and impulsive behaviour.
- 7.15.28 Many children in the UK will see a substantial change in their educational environment, with the majority of children transitioning from primary school into secondary school.<sup>1301</sup> Peer influences and social pressures start to have a significant impact on behaviour, and parental influence begins to decline.

### *Online presence*

- 7.15.29 The use of mobile phones to go online increases significantly for this age group with 86% of 10-12-year-olds using a phone to go online. The number of children using laptops to go online also rises; 48% of 10-12-year-olds use a laptop, compared to 26% of 8-9-year-olds).<sup>1302</sup> The increased use of phones and laptops may be linked to children's transition to secondary school, with laptops being provided for schoolwork, for example.
- 7.15.30 The use of online communication services and the use of social media increases at this age. Ofcom research found that 92% children aged 10-12 send messages or make voice or video calls, compared to 73% of 8-11-year-olds.<sup>1303</sup> Over three-quarters of 10-12-year-olds (76%) use social media apps/sites, compared to 54% of 8-9-year-olds.<sup>1304</sup> Similarly, there is an increase in children having their own profiles on apps/sites, with 84% of 10-12-year-olds having their own profile on a site or app, compared to 64% of 8-9-year-olds.<sup>1305</sup>

### *Parental involvement*

- 7.15.31 The type of supervision that parents deploy for their children's online use starts to change in this age group. There is a decrease in the percentage of parents reporting they are nearby, regularly checking what their child is doing.<sup>1306</sup> However, nearly eight in ten (78%)

---

<sup>1299</sup> Ofcom, 2022. [Research into risk factors that may lead children to harm online](#).

<sup>1300</sup> NHS, 2022. [Early or delayed puberty](#). [accessed 26 March 2024].

<sup>1301</sup> There are some exceptions, such as, middle schools, some independent schools (e.g. some prep schools go up to 13 years old), and those who have their own individual exception due changing year groups at school.

<sup>1302</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1303</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP4/QC3.

<sup>1304</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP13/QC13.

<sup>1305</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP20/QC20

<sup>1306</sup> 63% of parents of 10-12 year olds who are online, compared to 76% of 8-9 year olds who are online.

Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

parents of 10-12-year-olds who go online say they ask what their children is doing, or has done, online; higher than for most other age groups.<sup>1307</sup> More than half (52%) of parents of 10-12-year-olds who go online report checking their browser or device history, also higher than for most other age groups.<sup>1308</sup>

- 7.15.32 This age also appears to be a key period in which parents talk to their children about how to stay safe online. Nearly all (99%) parents of 10-12-year-olds who go online say they have talked to their child about how to stay safe online; higher than all other age groups.<sup>1309</sup>

#### *Age-specific risks*

- 7.15.33 More independent use of devices, and a shift in the type of parental supervision, as well as increased use of social media and messaging services to interact with peers, creates a risk of harmful encounters online. Children may start to be more exposed to, or more aware of, bullying content online, with 10-12-year-olds describing how they feel confused when trying to distinguish between jokes and ‘mean behaviour’ online.<sup>1310</sup> Due to the rapid neurological development taking place in the teenage brain at this point, the psychological impacts of bullying can last into adulthood.<sup>1311</sup> Research has found that more than one in four children have been exposed to pornographic content by the age of 11.<sup>1312</sup>
- 7.15.34 Despite a 13+ minimum age restriction for many social media sites, 84% of 10-12-year-olds say they have their own social media profile.<sup>1313</sup> Ofcom research also found that one in five (21%) children aged 8-17 with a social media account have an adult profile, having signed up with a false date of birth. Two in ten 8-12-year-olds have at least one adult-aged (18+) profile.<sup>1314</sup>

---

<sup>1307</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

<sup>1308</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

<sup>1309</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP28.

<sup>1310</sup> Children’s Commissioner, 2018. [Life in ‘likes’: Children’s Commissioner report into social media use among 8-12 year olds](#). [accessed 14 March 2024].

<sup>1311</sup> The Children’s Society and YoungMinds, 2018. [Safety Net: Cyberbullying’s impact on young people’s mental health. Inquiry report summary](#). [accessed 14 March 2024].

<sup>1312</sup> This study draws together research from focus groups with teenagers aged 13-19 and a survey of 1,000 young people aged 16-21. Of the 64% who said that they had ever seen online pornography, 10% had seen it by age 9, 27% had seen it by age 11 and half had seen it by age 13. Source: Children’s Commissioner, 2023. [‘A lot of it is actually just abuse’- Young people and pornography](#). [accessed 14 March 2024].

<sup>1313</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP20/QC20.

<sup>1314</sup> Ofcom, 2024. [Children’s Online ‘User Ages’](#)



## 13–15 years: Early teens

**This age group is fully online with children using an increasing variety of services and apps. Parents' involvement in their children's online use starts to decline. Increased independence and decision-making, couple with an increased vulnerability to mental health issues, means children can be exposed to, and actively seek out, harmful content.**

### *Life changes*

- 7.15.35 Adolescence continues, with teenagers undergoing a great deal of emotional, social, physical, and mental change.<sup>1315</sup> At the same time, peer influence become particularly important.<sup>1316</sup> Changes to self-regulation during puberty results in an increase in risk-taking and impulsive behaviour. Teenagers develop and assert their personality by making choices about their interests, friendship groups, and school.<sup>1317</sup>
- 7.15.36 This is a particularly critical stage for mental health challenges, with half of lifetime mental health disorders established by the age of 14.<sup>1318</sup> Evidence suggests that eating disorders and self-harm behaviours increase among this age group.<sup>1319 1320</sup>

### *Online presence*

- 7.15.37 At this age, more than 99% of 13-15-year-olds are online.<sup>1321</sup> Compared to younger children, there is an increase in the proportion of children using sites to send messages or make video or voice calls, with 98% of 13-15-year-olds doing this.<sup>1322</sup> There is also an increase in the proportion of children using live video streaming sites, with 81% of 13-15-year-olds doing this.<sup>1323</sup> Watching videos continues to be a popular activity for children, with 98% of 13-15-year-olds watching videos online.<sup>1324</sup>

---

<sup>1315</sup> Centers for Disease Control and Prevention, 2021. [Young Teens \(12-14 years of age\): Developmental Milestones](#). [accessed 14 March 2024].

<sup>1316</sup> Sturman, D. and Moghaddam, B., 2011. [The Neurobiology of Adolescence: Changes in brain architecture, functional dynamics, and behavioral tendencies](#). [accessed 9 April 2024]; Viner, R., 2013. [Life stage: Adolescence \(Chapter 8\)](#) in Department of Health and Social Care, 2013. Annual Report of the Chief Medical Officer 2012, Our Children Deserve better: Prevention Pays. [accessed 9 April 2024];

<sup>1317</sup> Centers for Disease Control and Prevention, 2021. [Young Teens \(12-14 years of age\): Developmental Milestones](#). [accessed 14 March 2024].

<sup>1318</sup> Kessler, R., Berglund, P., Demler, O., Jin, R., Merikangas, K., and Walters E., 2005. [Lifetime Prevalence and Age-of-Onset Distributions of DSM-IV Disorders in the National Comorbidity Survey Replication](#). [accessed 8 December 2023]. As cited in the recent NHS Long Term Plan. Source: NHS, 2019. [The NHS Long Term Plan](#). [accessed 9 April 2024].

<sup>1319</sup> A study by Breton et al. found the largest increase in eating disorder symptoms in adolescence is between the ages of 12 and 15. Breton, E., Dufour, R., Côté, S. M., Dubois, L., Vitaro, F., Boivin, M., Tremblay, R. E. and Boonij, L., 2022. [Developmental trajectories of eating disorder symptoms: A longitudinal study from early adolescence to young adulthood](#), *Journal of Eating Disorders*, 10(84). [accessed 22 April 2024].

<sup>1320</sup> NHS England Digital found that hospital admissions relating to self-harm in 2022-23 rose from 44 for 9-12-year-old boys to 300 for 13-17s. For girls the figure was 173 for 9-12-year-olds, peaking at 1,660 for 13-17s. NHS England Digital, 2023. [Hospital admissions relating to self-harm](#). [accessed 14 March 2024].

<sup>1321</sup> Note: we report more than 99% rather than 100%, due to rounding technicalities. Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1322</sup> Compared to 92% of 10-12-year-olds. Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP4/QC3.

<sup>1323</sup> Compared to 92% of 10–12-year-olds. Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP10/QC9.

<sup>1324</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP5/QC4.

- 7.15.38 This age group are more active generators of content than younger children. There is an increase in the proportion of children who are active online, (sharing, commenting, and posting), compared to the more passive users.<sup>1325</sup> Uploading videos they have created themselves is also popular among this age group; 46% of 13-15-year-olds do this.<sup>1326</sup>
- 7.15.39 Thirteen is the minimum age requirement for a majority of social media sites.<sup>1327</sup> Unsurprisingly, the proportion of children with their own profile set up on social media sites increases for this age group; 97% of 13-15-year-olds have their own profile, compared with 84% of 10-12-year-olds.<sup>1328</sup>
- 7.15.40 Teenagers increasingly start to use more sites and apps with ‘social’ aspects. While YouTube dominates younger children’s online use, teenagers increasingly use other apps and sites, alongside YouTube. This includes WhatsApp (used by 80% of 13-15-year-olds), TikTok (79%) and Snapchat (72%).<sup>1329</sup> These three sites show an increase in popularity compared to use among 10-12-year-olds.
- 7.15.41 At this age mobile phones now dominate children’s online use, with 97% of 13-15-year-olds using a phone to go online. Tablets decline in popularity, with 43% of 13-15-year-olds using them to go online. There is also increased use of desktop computer and laptops among this age group; 73% of 13-15-year-olds use one to go online, compared to 56% of 10-12-year-olds.<sup>1330</sup> This may be due to having more electronically based schoolwork.

#### *Parental involvement*

- 7.15.42 More children at this age are online without any parental supervision or technical tools. There is a decrease in parental supervision at this age, with 15% of parents of 13-15-year-olds saying they do not supervise their children’s online access and use. But a majority (69%) of parents of 13-15-year-olds still ask their children what they are doing, or have done, online. There is an increase in the proportion of parents who say they do not use technical tools or controls to manage their children’s access to online content; 29% of parents of 13-15-year-olds say they do not use such tools.<sup>1331</sup>
- 7.15.43 Parents are increasingly more confident in their children’s ability to stay safe online, with 34% of 13-15-year-olds saying they trust their child to be sensible (in terms of online safety).<sup>1332</sup> However, nearly half (49%) of parents of 13-15-year-olds agree that they find it hard to control their child’s screen time.<sup>1333</sup> This is the first age group in which we see more parents agreeing than disagreeing that “*I find it hard to control my child's screen time*”.<sup>1334</sup>

---

<sup>1325</sup> 31% of 12-15-year-olds share, comment or post things on social media compared to 24% of 10-12-year-olds. Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QC19.

<sup>1326</sup> Compared to 39% of 10-12-year-olds. Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP6/QC5.

<sup>1327</sup> At 13 years old, children can consent to their personal data being processed. This is detailed below in section: Note on other relevant regulation.

<sup>1328</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP20/QC20.

<sup>1329</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP4/QC3, QP5/QC4, QP13/QC13

<sup>1330</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP1.

<sup>1331</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27; QP32

<sup>1332</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP76A

<sup>1333</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP75A

<sup>1334</sup> 49% agree, 35% disagree.

### Age-specific risks

- 7.15.44 A greater use of online services, more independent decision-making, and the risk-taking tendencies common in this age group, can together increase the risk of encountering harmful content. For example, a mix of increased independence, risk-taking behaviour and sexual curiosity can make children in this age group more likely to actively seek out pornographic content, with 28% of 14-15s reporting that their viewing of pornography was ‘mostly intentional’.<sup>1335</sup>
- 7.15.45 One in five (19%) 13-15-year-olds have an adult-aged profile, potentially exposing them inappropriately-aged content.<sup>1336</sup> A falsely-aged profile will also mean a child can access and use functionalities on platforms that have a minimum age of 16 years old, such as direct messaging or livestreaming on some services.
- 7.15.46 Exposure to hate and bullying content increases from the age of 13. Sixty-eight per cent of 13-17s say they have seen images or videos that were ‘mean, or bully someone’, compared to 47% of 8-12-year-olds.<sup>1337</sup> Encountering hate online is also quite common; three-quarters of children aged 13-15 report having seen online hate on social media.<sup>1338</sup>
- 7.15.47 Children in this age group are particularly vulnerable if they encounter content relating to self-harm and suicide.<sup>1339</sup> Due to hormonal changes and mental health challenges, children in this age group may be at risk of the most severe impacts from encountering this type of content, particularly if seen in high volumes.<sup>1340</sup> Eight per cent of 13-17-year-olds had experienced/seen content promoting self-harm, and 6% had experienced/seen content promoting suicide over a four-week period.<sup>1341</sup>
- 7.15.48 Children in this age group are more likely to suffer from eating disorders. The NHS states that anyone can get an eating disorder, but teenagers (between 13 and 17 years) are the most likely to be affected.<sup>1342</sup> Fifteen per cent of 13-17-year-olds report experiencing or seeing content relating to eating disorders over a four-week period.<sup>1343</sup>

---

<sup>1335</sup> BBFC, 2019. [Children see pornography as young as seven, new report finds](#). 26 September 2019. [accessed 14 March 2024].

<sup>1336</sup> Ofcom, 2024. [Children’s Online ‘User Ages’](#)

<sup>1337</sup> UK Safer Internet Centre, 2017. [Power of Image: A report into the influence of images and videos in young people’s digital lives](#). [accessed 14 March 2024].

<sup>1338</sup> UK Safer Internet Centre, 2016. [Creating a Better Internet for All: Young people’s experiences of online empowerment + online hate](#). [accessed 14 March 2024].

<sup>1339</sup> Self-harm content (described here as ways of physically harming or hurting themselves) had been encountered by 4% of 11-12-year-olds, 7% of 13-14-year-olds, and 10% of 15-16-year-olds. Content showing suicide methods had been seen by 3% of 11-12-year-olds, 5% of 13-14-year-olds and 6% of 15-16-year-olds. Source: Livingstone, E., Haddon, L., Görzig, A. and Ólafsson, K., 2011. [Risks and safety on the internet: the perspective of European children: full findings and policy implications from the EU Kids Online survey of 9-16-year-olds and their parents in 25 countries](#). [accessed 9 April 2024].

<sup>1340</sup> [CONFIDENTIAL~~X~~]

<sup>1341</sup> Ofcom, 2023. [Online Experiences Tracker](#).

<sup>1342</sup> NHS, 2024. [Overview – Eating disorders](#). [accessed 14 March 2024].

<sup>1343</sup> Ofcom, 2023. [Online Experiences Tracker](#).

## 16–17 years: Approaching adulthood

**At 16 children attain legal rights for the first time, while parental supervision, and parental concern about their online safety, both decrease. But changes in their behaviour and decision-making ability at this age can lead to an increased risk of exposure to harmful content.**

### *Life stages*

- 7.15.49 At 16, children in the UK gain new rights and freedoms, such as being able to leave school, leave home, earn the minimum wage, and legally consent to having sex. This transitional period to adulthood can mark the beginning of a more independent life. The scale of life changes at this age can be significant, and can include earning income by working, joining the armed forces, and leaving the care system. If not in an apprenticeship or training, children will continue to be in full-time education.
- 7.15.50 During these ages children will seek out new, more adult experiences, and may push at pre-existing boundaries to establish their independence. These might include sexual activity, which is legal for this age group. And 16-17-year-olds may start to take risks and engage in activities that are illegal for under-18s, such as drinking alcohol and vaping or smoking. Children do start participating in these activities at an earlier age, but as 16- and 17-year-olds are considered ‘nearly legal’, parents/guardians and people in positions of authority may be more likely to accept their engagement in these activities.
- 7.15.51 Despite their increased legal rights, children’s cognitive and emotional processing is not yet fully developed. Adolescent brains continue to develop during this period, and beyond, into the mid-20s.<sup>1344</sup>

### *Online presence*

- 7.15.52 The online behaviours of children at this age are broadly similar to 13-15-year-olds. One difference is that 16-17-year-olds use more online services. On average, this age group uses a higher number of services/apps for social media, video sites and messaging sites, compared to younger age groups.<sup>1345</sup> Compared to younger age groups, there are also a higher proportion of 16-17-year-olds using communication services. These include ‘professional’ communications services and may reflect the fact that children in this age group may be working or doing more ‘business-like’ activities.
- 7.15.53 This age group are socialising online and are more likely than younger age groups to communicate with people they do not know personally. Ofcom research found that 37% of 16-17-year-olds who used apps with messaging functionalities at least weekly were connected with some people online that they did not know personally.<sup>1346</sup> Children aged

---

<sup>1344</sup> Johnson, S., Blum, R. and Giedd, J., 2019. [Adolescent maturity and the brain: the promise and pitfalls of neuroscience research in adolescent health policy](#), *Journal of Adolescent Health*, 45 (3), pp.216-221. [accessed 16 April 2024].

<sup>1345</sup> Alongside the use of YouTube, WhatsApp and TikTok, other online services are popular among this age group. There is increased use of social media sites, including Snapchat (used by 79% of 16-17-year-olds), Instagram (80%), Facebook (62%) and X/Twitter (17%). There are also more 16-17s using communication services, such as FaceTime (36%), Microsoft Teams (17%) and Zoom (13%). Source: Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP4/QC3, QP5/QC4, QP13/QC13.

<sup>1346</sup> Ofcom, 2023. [Understanding Online Communications Among Children](#). QA2A.

16-17 were also more likely than children aged 11-12 to reply to messages from people who added them as a connection but whom they did not know personally.<sup>1347</sup>

### *Parental involvement*

- 7.15.54 At this age there is a drop in the level of parental supervision of children’s online activity. Sixty-four per cent of parents of 16-17-year-olds do at least one form of supervision of online activity – significantly lower than for younger age groups.<sup>1348</sup> Similarly, there is less use of technical tools or controls to manage children’s access to online content, with just over half of parents of 16-17-year-olds (54%) saying they use such a tool.<sup>1349</sup> There is also a decrease in the proportion of parents who set rules for their child’s online behaviour.<sup>1350</sup>
- 7.15.55 Despite the increased risk to exposure to harmful content, Ofcom research found that parents of 16-17-year-olds are less concerned about their children being exposed to potentially harmful content, such as sexual content or violent content, compared to parents of younger children.<sup>1351</sup>

### *Age-specific risks*

- 7.15.56 Children in this age group may be more likely to engage in certain behaviours that increase their risk of encountering harmful content. For example, this age group, together with 13-15s, are the most likely to watch or share content on livestreaming services (81% of 16-17-year-olds).<sup>1352</sup> Due to the challenges of moderating livestreamed services, this presents a risk of encountering harmful content.<sup>1353</sup>
- 7.15.57 Ofcom research has also found that almost three in ten (27%) 16–17-year-olds have a profile with an age of at least 18,<sup>1354</sup> so these children could receive age-inappropriate content suggestions as well as access restricted functionalities. For example, some services restrict the use of livestreaming to 18-year-olds.
- 7.15.58 Older children are also more likely to experience communication that potentially makes them feel uncomfortable; 64% of 16-17-year-olds reported experiencing at least one potentially uncomfortable communication, compared to 58% of 13-15-year-olds. These uncomfortable experiences included receiving abusive, nasty, or rude messages/voice notes/comments, reported by one in five (20%) 16-17-year-olds.<sup>1355</sup>

---

<sup>1347</sup> Ofcom, 2023. [Understanding Online Communications Among Children](#). QB3.

<sup>1348</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP27.

<sup>1349</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP32.

<sup>1350</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP26.

<sup>1351</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP51L, QP51K.

<sup>1352</sup> Ofcom, 2023. [Children and Parents Media Literacy Tracker](#). QP10/QC9.

<sup>1353</sup> See ‘Abuse and Hate’ section (Section 7.4) for more information.

<sup>1354</sup> Ofcom, 2024. [Children’s Online ‘User Ages’](#)

<sup>1355</sup> Ofcom, 2023. [Understanding Online Communications Among Children](#). QC1. The potentially uncomfortable communications we asked about were: an unwanted friend or follow request, being asked to share naked or half-dressed pictures or videos, being asked to share personal information, a friend request from someone pretending to be someone else, receiving pictures or videos of naked or half-dressed people, abusive or nasty messages, being added to a video call/group video call/group chat with people not known well or at all, being asked to move chat to a different platform by someone not known well or at all.

## Note on other relevant regulation

7.15.59 As well as aligning with the ICO Age Appropriate Design Code, the proposed age groupings broadly align with other relevant regulation that considers age-appropriate content:

- a) Children gain personal responsibility and consent over their own personal data at 13. At the age of 13, children can consent to their data being processed, if services rely on consent as the lawful basis for processing data in the context of offering an online service directly to a child (by virtue of Article 8(1) of the GDPR and s9 of the DPA 2018). Children younger than 13 cannot provide their own consent to the processing of their personal data; parental consent is required.
- b) From the age of 16, the guidance from the Games Rating Authority changes. For example, ‘depictions of moderate violence towards human-like or animal-like characters’ are deemed appropriate for 12-15-year-olds, whereas for 16 years and over ‘depictions of strong, realistic-looking violence towards human-like or animal-like characters’ are deemed appropriate.

7.15.60 However, we recognise that there is some inconsistency with our proposed age groupings compared to some other relevant regulation. The British Board of Film Classification (BBFC) provides content guidelines based on slightly different age milestones to the ones we propose here. For instance, different sets of guidelines are provided for children under 12, children aged 12 and above,<sup>1356</sup> and children aged 15 and over.<sup>1357</sup> The Games Rating Authority provides guidelines targeting 12-year-olds and over.<sup>1358</sup>

---

<sup>1356</sup> For example, BBFC guidelines say that for universally appropriate content (rated ‘U’) violence will generally be very mild, whereas for ‘12’ or ‘12A’ rated content “*there may be moderate violence, but it should not dwell on detail*”. Source: BBFC, n.d. [Classification Guidelines](#). [accessed 28 March 2024].

<sup>1357</sup> For example, BBFC guidelines say that for content rated ‘12’ or ‘12A’, “*discriminatory language or behaviour must not be endorsed by the content... Such behaviour is unlikely to be acceptable if accompanied by violence*”, whereas for ‘15’ rated content “*discriminatory language, themes and behaviour are permitted, but must not be endorsed by the content as a whole*”. Source: BBFC, n.d. [Classification Guidelines](#). [accessed 28 March 2024].

<sup>1358</sup> The Games Rating Authority guidelines sets out that games rated PEGI 12 may contain themes including more detailed/realistic looking violence towards fantasy characters, moderate violence for human characters, moderate horror, milder forms of swearing, sexual innuendo/implied sexual activity and suggestive/posing music videos. Source: Games Rating Authority, n.d. [Our Ratings System](#). [accessed 28 March 2024].

# 8. Ofcom's Guidance on Content Harmful to Children

This section sets out the approach we have taken to developing our draft Guidance on Content Harmful to Children, which is intended to provide guidance to all service providers that may need to make judgements about whether content on their service amounts to content that is harmful to children as defined in the [Online Safety Act 2023](#) ('the Act').

We are inviting stakeholder comments on our approach, as well as the draft guidance itself which we are publishing as Sections 8.1-8.10.

## Consultation questions

12. Do you agree with our proposed approach, including the level of specificity of examples given and the proposal to include contextual information for services to consider?
13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?
14. For each of the categories of content discussed, are there additional examples of content that Ofcom should consider to be harmful or consider not to be harmful or where our current proposals should be reconsidered?

## Introduction

---

- 8.1 Section 53(1) of the Act requires Ofcom to provide guidance for providers of Part 3 services (i.e., U2U and search services) which gives examples of content, or kinds of content, that Ofcom considers to be, or considers not be, primary priority content and priority content that is harmful to children ('Guidance on Content Harmful to Children').
- 8.2 Ofcom's draft Guidance on Content Harmful to Children is intended to support service providers that may need to make judgements about whether content on their service amounts to content that is harmful to children as defined in the Act.
- 8.3 In this section, we set out the approach we have taken to developing our draft Guidance on Content Harmful to Children. We explain key terms and the structure of the draft guidance. We then set out the relevant considerations and limitations that we have taken into account when drafting the guidance, where we would particularly welcome comments.
- 8.4 The draft guidance itself is published as Sections 8.1-8.10, which make up the remainder of this volume.

## Content harmful to children

---

- 8.5 Content that is harmful to children is defined within section 60(2) of the Act and means:



- a) Primary priority content that is harmful to children<sup>1359</sup>,
  - b) Priority content that is harmful to children<sup>1360</sup>,
  - c) Content, not within paragraph (a) or (b), of a kind which presents a material risk of significant harm to an appreciable number of children in the United Kingdom.
- 8.6 'Non-designated content' (NDC), as set out in (c), is a distinct category of content in the Act. It is not addressed in the Guidance on Content Harmful to Children but is addressed in the Children's Register of Risks in Section 7.9.
- 8.7 The Act requires providers of Part 3 services that are likely to be accessed by children to assess the risk of child users of the service encountering each kind of primary priority content (PPC) and priority content that is harmful to children (PC), and to use proportionate measures to mitigate and manage the risks of harm to children as identified in their risk assessment. Please see 'Provider duties' within the Legal Framework annex (Annex 13) which sets out the duties that apply in respect of PPC and PC in full.
- 8.8 Ofcom is not required to set out examples of, or kinds of non-designated content ('NDC'), within the draft Guidance. However, NDC is also content that is harmful to children as defined under the Act. Our draft guidance instead signposts services to the draft Children's Risk Assessment Guidance (published in draft at Annex 6) for further detail on how to risk assess NDC and to the draft Children's Register of Risks as to Ofcom's approach on assessing potential NDC. If, following our consultation, we conclude that specific kinds of content meet the definition of NDC in our Register of Risks, we will consider whether it is appropriate to provide examples of those kinds of NDC within this Guidance.
- 8.9 As explained in the Introduction to Ofcom's draft Children's Register of Risks (Section 7), some kinds of harmful content manifest online in similar ways, and are often considered together within the evidence base. In line with the approach taken in the draft Register, we have therefore considered it appropriate to group some kinds of PPC and PC together.
- 8.10 We have grouped the 12 types of content harmful to children into nine broader categories: pornographic content; suicide content; self-injury content; eating disorder content; abuse and hate content; bullying content; violent content; dangerous stunts and challenges content; and harmful substances content. These categories are illustrated in Table 8.1 below:

---

<sup>1359</sup> The kinds of PPC are set out and defined in full in section 61 of the Act.

<sup>1360</sup> The kinds of PC are set out and defined in full in section 62 of the Act.

**Table 8.1: Content harmful to children covered in our guidance**

Section number	Primary priority content that is harmful to children	Kind of harmful content, as defined in the Act
1	Pornographic content	Pornographic content <sup>1361</sup> , other than content which – <ul style="list-style-type: none"> <li>(a) Consists only of text, or</li> <li>(b) Consists only of text accompanied by-                             <ul style="list-style-type: none"> <li>(i) Identifying content which consists only of text;</li> <li>(ii) Other identifying content which is not itself pornographic content;</li> <li>(iii) A GIF which is not itself pornographic content;</li> <li>(iv) An emoji or other symbol, or</li> <li>(v) Any combination of content mentioned in sub-paragraphs (i) to (iv).<sup>1362</sup></li> </ul> </li> </ul>
2	Suicide content	Content which encourages, promotes or provides instructions for suicide. <sup>1363</sup>
3	Self-injury content	Content which encourages, promotes or provides instructions for an act of deliberate self-injury. <sup>1364</sup>
4	Eating disorder content	Content which encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder. <sup>1365</sup>
5	Content which is abusive or incites hatred	Content which is abusive and which targets any of the following characteristics – <ul style="list-style-type: none"> <li>(a) Race;</li> <li>(b) Religion;</li> <li>(c) Sex;</li> <li>(d) Sexual orientation;</li> <li>(e) Disability, or</li> <li>(f) Gender reassignment.<sup>1366</sup></li> </ul> Content which incites hatred against people – <ul style="list-style-type: none"> <li>(a) Of a particular race, religion, sex or sexual orientation;</li> <li>(b) Who have a disability, or</li> <li>(c) Who have the characteristic of gender reassignment.<sup>1367</sup></li> </ul>
6	Violent content	Content which encourages, promotes or provides instructions for an act of serious violence against a person. <sup>1368</sup> Content which – <ul style="list-style-type: none"> <li>(a) Depicts real or realistic serious violence against a person;</li> <li>(b) Depicts the real or realistic serious injury of a person in graphic detail.<sup>1369</sup></li> </ul> Content which –

<sup>1361</sup> Section 61(2) of the Act.

<sup>1362</sup> Section 61(6) of the Act.

<sup>1363</sup> Section 61(3) of the Act.

<sup>1364</sup> Section 61(4) of the Act.

<sup>1365</sup> Section 61(5) of the Act.

<sup>1366</sup> Section 62(2) of the Act.

<sup>1367</sup> Section 62(3) of the Act.

<sup>1368</sup> Section 62(4) of the Act.

<sup>1369</sup> Section 62(6) of the Act.

Section number	Primary priority content that is harmful to children	Kind of harmful content, as defined in the Act
		<ul style="list-style-type: none"> <li>(a) Depicts real or realistic serious violence against an animal;</li> <li>(b) Depicts the real or realistic serious injury of an animal in graphic detail;</li> <li>(c) Realistically depicts serious violence against a fictional creature or the serious injury of a fictional creature in graphic detail.<sup>1370</sup></li> </ul>
7	<b>Bullying content</b>	Bullying content. <sup>1371</sup> Content may, in particular, be bullying content if it is content targeted against a person which – <ul style="list-style-type: none"> <li>(a) Conveys a serious threat;</li> <li>(b) Is humiliating or degrading;</li> <li>(c) Forms part of a campaign of mistreatment.<sup>1372</sup></li> </ul>
8	<b>Dangerous stunts and challenges content</b>	Content which encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it or to someone else. <sup>1373</sup>
9	<b>Harmful substances content</b>	Content which encourages a person to ingest, inject, inhale or in any other way self-administer— <ul style="list-style-type: none"> <li>(a) A physically harmful substance;</li> <li>(b) A substance in such a quantity as to be physically harmful.<sup>1374</sup></li> </ul>

## Structure of the draft guidance

- 8.11 Our draft guidance consists of 10 sections. The first of these (published in draft as Section 8.1) is an introduction, which sets out the background and cross-cutting considerations to help services better understand the guidance and Ofcom’s proposed approach to understanding how to identify various kinds of PPC and PC.
- 8.12 The remaining sections (published in draft as Sections 8.2-8.10 of this consultation) contain non-exhaustive lists of examples of content, or kinds of content, that we consider to be, or consider not to be, PPC or PC. We also define key terms and include other relevant contextual information to assist services in making a judgement about whether content is a particular kind of PPC or PC. There is one section for each of the nine categories of content. This structure broadly reflects the structure of the Children’s Register of Risks.<sup>1375</sup> Within sections covering a number of kinds of harmful content in the Act (e.g. violent content), we provide examples for different kinds of that content (e.g. content depicting violence against people, and content depicting violence against animals).

<sup>1370</sup> Section 62(7) of the Act.

<sup>1371</sup> Section 62(5) of the Act.

<sup>1372</sup> Section 62(12) of the Act.

<sup>1373</sup> Section 62(8) of the Act.

<sup>1374</sup> Section 62(9) of the Act.

<sup>1375</sup> Suicide and self-harm are separated in the Guidance on Content Harmful to Children and but are considered together in the Register. This is because while there are similarities in how these harms manifest, examples are likely to be different.

## Our proposed approach

---

- 8.13 In this section we explain where we have exercised our regulatory discretion and the implications of this. We set out our interpretation of key terms within the Act, the evidence base to support the approach taken in the draft guidance, our development of examples of content, relevant contextual information and further considerations for services.
- 8.14 The purpose of the Guidance on Content Harmful to Children is to support services to identify content that is PPC or PC. This draft guidance is therefore limited to providing a non-exhaustive list of examples of kinds of content that we consider to meet, or not to meet, the definitions of PPC or PC as set out in the Act. It is not an assessment of whether content is, or is not, harmful to children in terms of impact. It is therefore possible that content may not meet the definition of PPC or PC, but may still be inappropriate for children in certain age groups (particularly in younger age groups). Further, content that does not meet the definition of PPC or PC could meet the definition of NDC and would therefore be deemed content that is harmful to children as defined in the Act (see Section 7.9).
- 8.15 Once we have issued the Guidance on Content Harmful to Children, we expect to continue to monitor its effectiveness and proportionality at appropriate intervals, taking into account the evolving online context and developing evidence base.

## Interpretation of terms within the Act

- 8.16 In section 236(1) of the Act, ‘content’ is defined as “anything communicated by means of an internet service, whether publicly or privately, including written material or messages, oral communications, photographs, videos, visual images, music and data of any description”. It is therefore a broad definition which is capable of capturing a very wide range of different types and formats of user-generated content and search content, including user interactions of various kinds.
- 8.17 A number of the designated categories of PPC and PC set out within the Act include repeated descriptive terms such as ‘encourages’, ‘promotes’ or ‘provides instructions for’. In developing our approach to the proposed examples, we have used standard dictionary definitions to inform the ordinary meaning and have also applied our knowledge and understanding of particular content types and harms to ensure that our interpretations of these terms are applicable to online content, in some instances departing from or expanding the ordinary meaning where we have considered it appropriate to do so. Through our examples we have sought to illustrate what these generic terms would look like in the context of a specific type of content. As an example, we acknowledge that ‘promoting’ or ‘encouraging’ suicide can take many forms and our definitions of these terms have therefore sought to capture content that normalises, romanticises, or glorifies suicide, as we propose that such content can portray suicide as a positive, aspirational or desirable outcome and therefore encourage or promote the act of suicide.

## Evidence base

- 8.18 The draft guidance is based on the evidence set out in our Children’s Register of Risks, which is based on a repository of quality assured evidence of nearly 500 individual sources, including Ofcom’s own research with children and parents or carers, and those working with children. We have considered responses from our January 2023 Call for Evidence, as well as relevant Ofcom research, academic papers from a range of disciplines, government bodies, third-party sources and information from charities and non-government organisations. We have also used Ofcom’s extensive expertise and experience of identifying harmful content on broadcast media and online.
- 8.19 Some types of content harmful to children have a broader evidence base than others, which has dictated the level of detail for the different kinds of content provided in the draft guidance. This is not a reflection of Ofcom’s own judgement as to the severity or importance of some types of harmful content in comparison to others. Where the evidence base is lighter at this early stage of the regime, we particularly invite consultation responses that provide additional evidence to support our guidance on those types of harmful content.

## Examples of primary priority content and priority content that is harmful to children

- 8.20 In developing examples of kinds of content, that Ofcom consider to be, or consider not be, PPC and PC, we have carefully considered the appropriate level of specificity of those examples. We are not required to produce an exhaustive list of examples, nor do we consider such an approach to be proportionate or appropriate. We have therefore sought to offer a non-exhaustive, illustrative list of the examples or kinds of content we consider to be, or not to be, PPC or PC. The proposed level of specificity seeks to balance clarity with broad applicability. We consider that even if we were to set out a more comprehensive list, this is still unlikely to capture all relevant content across all the types of service that are in scope of the Part 3 duties, while overly broad examples would be less helpful for services in seeking to assess whether a particular piece of content meets any of the definitions of PPC or PC.
- 8.21 The different kinds of harmful content also vary in their nature, which has informed the examples we have developed. For example, bullying content is often highly subjective and context specific, and can relate more to the behaviour of users than to the specific nature of the content itself. We sometimes use illustrations of specific formats in examples (such as a post or comment) where it is relevant to the harm, but in other cases we describe what the content depicts, regardless of format. Where we have specified a format, that does not imply that harmful content can only be in that format. Similarly, this should not be taken as suggesting that all content within such a format is likely to be harmful in the way described. We have therefore exercised our regulatory judgement in our proposed approach to best reflect the nature of the content as defined in the Act and our knowledge and understanding of how these types of content can present.
- 8.22 News publisher content is excluded from the definition of regulated user-generated content in the Act, and is therefore not subject to the safety duties about protecting

children and illegal content.<sup>1376</sup> Accordingly, service providers will not be required to take any action regarding this content under these safety duties. Additional protections for news publisher content will apply to Category 1 service providers, who (subject to limited exceptions) must not take action in relation to news publisher content, or a user that is a recognised news publisher, before notifying the recognised news publisher in question and giving them an opportunity to make representations.<sup>1377</sup>

- 8.23 Journalistic content or content of democratic importance as defined in the Act<sup>1378</sup> could potentially meet the definition of one or more kinds of PPC or PC. Where this is the case, we consider that in line with the children’s safety duties, children should be adequately protected from this content. In some sections, we provide examples of journalistic content that we think could be considered PC. We also provide some examples of journalistic content that we consider do not meet the definition of PPC or PC.
- 8.24 This guidance focuses only on the features of content that would meet the definition of PPC or PC. We have not discussed the role of particular accounts or individuals in creating or disseminating harmful content.
- 8.25 We decided not to reproduce visual examples of content (either real or synthetic), but instead chose to use descriptions to illustrate the examples of harmful content. We considered that this would be unnecessary as a sufficient level of detail could be achieved with described examples and, in fact, providing real or synthetic depictions risked including harmful content in the guidance that could cause harm to those reading it or could risk enabling users to deliberately refer to such examples to evade detection through content moderation processes.

## Contextual factors and considerations for services

- 8.26 In developing our proposed approach to the Guidance on Content Harmful to Children we have exercised our regulatory discretion to include further guidance and information to services beyond providing examples of content or kinds of content that Ofcom considers to be, or not to be, PPC or PC. We have included considerations about context, as it is important for determining the nature of the content. Some of these are contextual factors relevant to several categories of content while others are more specific to certain categories of content. This approach aims to assist services by providing additional detail to consider while they are implementing measures to comply with the relevant children’s safety duties, but we recognise that the pertinent context to consider in relation to different categories of content may develop over time as the online environment evolves. As noted above, we expect to update the Guidance on Content Harmful to Children from time to time.

---

<sup>1376</sup> See sections 55 and 56 of the Act. A recognised news publisher is defined as the BBC, S4C, the holder of an Ofcom broadcast licence who publishes news-related material in connection with the broadcasting activities authorised under the licence or an entity which meets a number of specified criteria. For example, has as its principal purpose the publication of news-related material which is created by different persons and subject to editorial control; publishes such material in the course of a business (whether or not carried on with a view to profit); is subject to a standards code; has policies and procedures for handling and resolving complaints; has a registered office or other business address in the United Kingdom.

<sup>1377</sup> Section 18 of the Act. See section 18(9) for circumstances where a provider will not be regarded as taking action in relation to news publisher content.

<sup>1378</sup> See sections 19(10)-(11) and 17(7) of the Act.

- 8.27 As with the examples included in the draft guidance, the contextual factors represent an effort by Ofcom to provide services with non-exhaustive information for consideration when making judgements about whether the content meets the definition of PPC or PC, rather than an attempt to anticipate every circumstance which may arise during content moderation.
- 8.28 While a single piece of content taken on its own may not appear significant to an outsider, it may form part of a wider pattern of, for example, bullying behaviour that is significant to the target of the content. In this regard, our draft guidance suggests that services should consider other contextual information that accompanies content when deciding whether it is content harmful to children, such as user reports or complaints in the case of bullying content.
- 8.29 In developing the proposed examples that we have included within the draft guidance, we appreciate that it is not always clear cut as to whether content does, or does not, meet the definition under the Act. We acknowledge the complexity for services in assessing such content. For the purposes of the proposed guidance, we therefore suggest that services should take care in instances in which it may not be immediately clear whether it meets the definition of PPC or PC.

### Recovery content

- 8.30 We have included considerations about “recovery content” in our suicide, self-harm and eating disorder sections because it may not always be clear whether recovery content does, or does not, meet the definition of PPC. Although some of this content may serve a valid purpose to individuals in allowing self-expression and aiding their recovery, it may still be harmful to children. There is a significant amount of content online that meets the definition in the Act of “content which encourages, promotes or provides instructions for suicide” or “an eating disorder” that in some way is intended to be, or is presented or described as, recovery content. Nonetheless, we are mindful that not all recovery content will meet the definition under the Act in encouraging, promoting, or providing instructions for suicide.
- 8.31 Ofcom is aware of the potential risks of including recovery content broadly in its guidance, including: contributing to the stigma associated with suicide and poor mental health; restricting children’s ability to discuss their mental health, physical health or difficult feelings in a safe environment; restricting children’s ability to seek help or support in times of need; and the risk of genuinely safety promoting or suicide prevention content being restricted.
- 8.32 We have therefore sought to sensitively strike a balance within our draft guidance and setting out circumstances in which recovery content may or may not meet the definition under the Act. This seeks to avoid services assessing genuine health promoting content as being harmful to children, while ensuring that harmful content is captured. We have proposed that services should carefully consider whether the particular features of suicide, self-harm and eating disorder content are present alongside the additional information in the guidance when making judgements on content.

### Overlaps between different kinds of content that is harmful to children

- 8.33 We have also taken into consideration that multiple kinds of PPC and PC, such as suicide or self-harm content, may have similarities and so a piece of content may be in scope of more than one kind of content that is harmful to children. For example, abuse and hate content may overlap with bullying content, specifically where content is targeted at a listed



characteristic while also being unwanted contact.<sup>1379</sup> In several sections in the draft guidance, we outline these areas of overlap, to the extent we consider helpful for services to pay attention to these.

- 8.34 We recognise that some of the kinds of content that are harmful to children are closely linked to the offences outlined in the draft Illegal Content Judgements Guidance ('ICJG')<sup>1380</sup> published as part of our [Illegal Harms Consultation](#). For example, it is illegal to intentionally encourage and assist suicide. Meanwhile, content that encourages, promotes, or provides instructions for suicide is classed as content harmful to children. While we cannot set out to definitively demarcate where the line exists between illegal content and content that is harmful to children, we have instead sought to highlight content that *may* be illegal and refer services to the ICJG where appropriate.
- 8.35 It is also not the main purpose of the Guidance on Content Harmful to Children to reiterate material that is already captured within the draft ICJG, although the overlap between the definition of illegal content and the definitions of content harmful to children means some overlap is inevitable. In this regard, our examples have been drafted in the knowledge that Ofcom has yet to reach a final decision on the ICJG. In particular, our consultation on animal cruelty offences will follow this consultation. We will review the wording of this draft guidance, in the light of consultation responses to the [Illegal Harms Consultation](#) and our forthcoming consultation on animal cruelty.

## Warnings

- 8.36 Within our draft guidance we propose that services should carefully consider the presence of warnings made by users in relation to content. Warnings are most relevant to suicide, self-harm, eating disorder and dangerous challenge or stunt content. A content warning may state "do not ever place a noose over your head" or "do not try at home". A trigger warning may say "Trigger Warning – proceed with caution". These warnings can often be used to avoid detection and/or attempt to limit the personal liability of the individual posting. Ofcom does not consider the presence of content and/or trigger warnings themselves to be a credible indicator as to whether content is harmful to children or not and, therefore, whether it meets the definition under the Act or not.
- 8.37 Where these warnings accompany content that, for example, does encourage, promote, or provide instructions for suicide, dangerous challenge or stunt content, we consider that this is insufficient mitigation to reduce the risk of harm to children. Harm could still be caused to a child even in the presence of a warning. We therefore consider that the presence of a warning will not be sufficient to mitigate any harm posed to children and that the content itself could still meet the definition of PPC or PC.

## Codewords, substitute terms and phrases, hashtags, sounds and comments

- 8.38 We have proposed to include codewords, substitute terms and phrases, hashtags, sounds and comments as elements for services to consider. This supplements our examples of content we consider to be, or consider not to be, content that is harmful to children.
- 8.39 Our evidence shows that users can apply trending music, or specific hashtags, to signal that it is referring to harmful content and some of that content may meet the corresponding definition under the Act. In particular, codewords and hashtags may be used to

---

<sup>1379</sup> Ecorys (commissioned by DCMS), 2022. [Qualitative research to investigate the impact of online harms on children](#) [accessed 1 March 2024].

<sup>1380</sup> Ofcom, 2023. [Illegal Content Judgements Guidance](#).

intentionally circumvent content moderation. Furthermore, while a specific post may not meet the definition of PPC or PC, comments included under such a post may include harmful content.

- 8.40 Specialist organisations can provide basic initial lists to assist a platform in thinking about the types of words and phrases employed by users to share and seek harmful content.
- 8.41 In several of our harmful content sections we therefore recommend that services should be mindful of the fact that sometimes it is not just the underlying piece of content itself (i.e. the original image, video, text or recording that may be the subject of a post), but its accompaniment by other content (whether comments, hashtags, or sounds) that provides more context to the original piece of content and, when viewed as a whole, may meet the corresponding definition under the Act.

## Rights assessment

---

- 8.42 The purpose of this draft guidance is to set out examples or kinds of content Ofcom considers, or does not consider, to meet the definitions of PPC or PC as required under section 53(1) of the Act.
- 8.43 In developing our proposed approach to this draft guidance we have, as set out above, exercised some degree of discretion. We have provided a series of non-exhaustive lists of illustrative examples of the kinds of content that Ofcom does, or does not, consider meets the definition of content that is harmful to children. We have also highlighted some contextual factors for services to take into account when making judgements about content.
- 8.44 In doing so, we have carefully considered whether our proposed guidance would constitute an undue inference with users' (both children and adults) fundamental rights, such as their rights to privacy, freedom of expression, freedom of thought, conscience and religion and to freedom of, association (Article 8, 9, 10 and 11 of the ECHR), or services' freedom of expression rights (see further Volume 1, Section 2 for a full description of these rights and the applicable legal framework). Our provisional conclusion is that it would not.
- 8.45 The proposed draft guidance is intended to assist providers to make judgements about whether content does, or does not, meet the legal definitions of the various kinds of PPC or PC when fulfilling their duties under the Act. Our draft guidance does not require a provider to take any specific action in relation to content hosted on a service, rather, it is for services to decide how to use this draft guidance to fulfil their duties under the Act relating to content that is harmful to children. It remains open to services as a commercial matter (and in the exercise of their own right to freedom of expression) to decide what forms of content to allow or not to allow on their service so long as they comply with the Act. A service provider may therefore choose to adopt terms of service which define the content it prohibits more widely than the definitions set out in the Act.
- 8.46 To the extent that the draft guidance affects how services might apply measures to specific kinds of content in the fulfilment of their duties under the Act, we have considered the rights impact of those measures separately, and do not repeat these here.
- 8.47 Nonetheless, we recognise that the examples we give, although illustrative, may impact how services apply the definitions in the Act, and so we have had careful regard in particular to freedom of expression rights in considering which examples to include, as we

acknowledge that if service providers do follow our guidance in fulfilling their children’s safety duties, they would likely restrict children’s (and in some cases as explained in relation to relevant measures in Volume 5, others’) access to content of the type outlined in the guidance. In doing so, we have taken into account the fact that some types of speech attract a higher degree of protection. Journalistic content that is political speech or on matter of public interests attracts a high level of protection; artworks, poetry, music and fiction is also protected. We have also explained where we consider that some types of more protected speech could still fall within the definitions of PPC or PC due to the potential harm to children and where we consider it would not. We have emphasised how context is important in assessing whether specific content would fall within a relevant definition. For example, in Section 8.3 on suicide content, we note the particular importance of codewords or hashtags and how this may indicate that certain types of artistic content which might otherwise not obviously be seen as encouraging, promoting or providing instructions for suicide, is in fact harmful within the meaning of the definition in the Act. The inclusion of these content formats is not to say that they will always meet the definition of PPC or PC, rather, that they may do, depending on the context.

- 8.48 We are mindful that additional duties apply to Category 1 services in respect of certain types of content, namely, news publisher content (which is exempt from the child safety duties), journalistic content and content of democratic importance.<sup>1381</sup> This draft Guidance is without prejudice to those duties which apply additionally and separately to the duties relating to protection of children. However, again, where relevant we have sought to give illustrative examples of where types of journalistic content may meet the definitions of PPC, or PC, and where they may not.<sup>1382</sup>
- 8.49 To the extent that service providers follow our guidance in deciding how to treat content in line with the children’s safety duties, we consider that the impact of this proposed draft guidance on child and adult users’ and services’ rights to freedom of expression, to be relatively limited, and is likely to constitute the minimum degree of interference required to secure that services comply with the child safety duties under the Act.
- 8.50 We have not identified any specific impacts on rights to privacy for users (both adults and children) given the nature of this guidance, and in particular as we are not recommending that services process or retain any particular kinds of personal data to identify content in scope of this guidance. We acknowledge that services may use this proposed guidance when making content moderation decisions, and this would involve the processing of users’ personal data. However, to the extent that the draft guidance affects how services might apply measures to specific kinds of content in the fulfilment of their duties under the Act, we have considered the rights impact of those measures separately.

---

<sup>1381</sup> As set out in sections 18, 19 and 17 of the Act

<sup>1382</sup> As noted above, news publisher content is not in scope of the children’s safety duties.

## Impacts on services

---

- 8.51 In this sub-section, we set out our assessment of the potential impacts of our draft guidance on service providers, including small and micro businesses. As Ofcom is required by legislation to provide this guidance, our assessment focuses on areas where we have exercised our discretion in developing it.
- 8.52 Compared to an approach where we would provide only a list of examples of content we consider to be PPC or PC or not, our proposed approach provides enhanced clarity to service providers and allows them to make their judgement considering the specificities and context of their service. The Guidance on Content Harmful to Children may also assist providers in meeting their legal requirements, as they may choose to reflect it in their own internal policies to comply with the children’s safety duties.
- 8.53 The main direct costs services will incur in relation to the Guidance on Content Harmful to Children are staff costs associated with consulting the guidance. We assess the impact on services of these costs, as well as the costs of consulting other pieces of evidence, in Volume 4, Section 12 of this consultation.<sup>1383</sup> By including additional guidance beyond a list of examples, our proposed Guidance on Content Harmful to Children may take longer to read. However, we consider the potential associated incremental costs to be negligible, including for small and micro businesses, and in any case outweighed by the benefits to services mentioned above.
- 8.54 The approach we have proposed may also result in services identifying a broader scope of PPC and PC than if we set out a relatively narrow list of examples. Services may therefore incur more costs to subsequently take appropriate steps to comply with the children’s safety duties. However, we consider this largely results from the Act itself and its intent to appropriately identify and mitigate risks to children. If we proposed a relatively narrow list of examples, services would likely fail to consider certain kinds of content as PPC and PC, thereby failing to comply with their legal duties to protect children. We therefore consider any incremental costs for services, including small and micro businesses, to be justified by the Act and outweighed by the benefits to children.
- 8.55 In conclusion, to the extent that our proposed approach imposes costs on services, we consider these largely flow from the requirements of the Act and are justified by the significant benefits they bring to both children and services. We therefore provisionally consider that our approach is proportionate, including for small and micro businesses.

---

<sup>1383</sup> As explained in Section 12, we consider these costs largely derive from the requirements of Act. This is because we recommend that all services should consult the Children’s Harms Guidance in order for their children’s risk assessment to be suitable and sufficient. Failing to do so would result in services failing to comply with their legal duties.

# 8.1 Ofcom's guidance on content harmful to children: introduction

**Warning: This guidance contains detailed descriptions of harmful content.**

This document discusses topics that may be very upsetting. We have endeavoured to treat such topics sensitively and note where a proper reflection of content that is harmful to children requires us to include themes which may cause distress. Support services and resources are signposted at the beginning of this Guidance.

If you find anything in this section distressing and would like to speak to someone or seek support, or if you or someone you know is struggling with suicide, self-harm or an eating disorder please consider seeking help from the following resources:

[Samaritans](#) Phone: 116 123  
(free 24/7 helpline)

[Childline](#), Phone: 0800 1111 (for children and young people under 19) (24/7 helpline)

[Campaign Against Living Miserably](#) (CALM),  
Phone: 0800 58 58 58  
(5pm-midnight every day)

[PAPYRUS](#) (for people under 35),  
Phone: 0800 068 41 41 (24/7 helpline)

[SOS Silence of Suicide](#), Phone: 0808 115 1505  
(8am to midnight weekdays and 4pm to midnight weekends)

[Shout](#), Text: text 'Shout' to 85258 (free support 24/7)

[Beat](#), the UK's eating disorder charity.  
Phone: 0808 801 0677  
(open from 3pm-8pm, Monday to Friday).

**NHS mental health services page by Nations:**

- [NHS England](#)
- [NHS Scotland](#)
- [NHS Wales](#)
- [HSC Northern Ireland](#)

**Dial 999 when a crime is in progress or when someone is in immediate danger.**

This document is Ofcom's [draft] Guidance on Content Harmful to Children for the purposes of section 53(1) of the Online Safety Act 2023 ('the Act'). The Act introduces a new concept of 'content that is harmful to children' which is relevant to the children's risk assessment duties and children's safety duties for services.

## Overview

- 8.1.1 This Guidance is comprised of nine sections, each of which provide examples of the content or kinds of content that Ofcom considers to be Primary Priority Content (PPC) that is harmful to children and Priority Content (PC) that is harmful to children, as defined in the Act.
- 8.1.2 The Guidance sections are as follows:
- Section 8.2, Guidance on pornographic content

- Section 8.3, Guidance on suicide content
- Section 8.4, Guidance on self-harm content
- Section 8.5, Guidance on eating disorder content
- Section 8.6, Guidance on abuse and hate content
- Section 8.7, Guidance on bullying content
- Section 8.8, Guidance on violent content
- Section 8.9, Guidance on harmful substances content
- Section 8.10, Guidance on dangerous stunts and challenges content

8.1.3 Table 8.1.1 in the following section provides more detail on how these kinds of content that are harmful to children are defined in the Act.

8.1.4 In this section we also provide:

- An overview of the legal framework of the Act that outlines Ofcom’s duties in producing guidance for services;
- An explainer of services’ duties under the Act;
- Considerations for services assessing content; and
- Information on the interaction of this Guidance with freedom of expression.

## Legal framework

---

8.1.5 The Act defines content as anything communicated by means of an internet service, whether publicly or privately, including written material or messages, oral communications, photographs, videos, visual images, music and data of any description<sup>1384</sup>.

8.1.6 The Act defines content that is harmful to children as:

- a) Primary Priority Content that is harmful to children;
- b) Priority Content that is harmful to children; or
- c) Other content which presents a material risk of significant harm to an appreciable number of children in the United Kingdom (which is sometimes referred to as “Non-designated Content that is harmful to children”).<sup>1385</sup>

8.1.7 The Act requires Ofcom to produce guidance for providers of Part 3 services (‘services’) which contains examples of content or kinds of content that Ofcom considers to be, or considers not to be, Primary Priority Content and Priority Content that is harmful to children. These types of content are set out in Table 8.1.1 below:

---

<sup>1384</sup> Section 236 (1) of the Act: <https://www.legislation.gov.uk/ukpga/2023/50/contents/enacted> [accessed 25 April 2024]

<sup>1385</sup> Section 60(2) of the Act.

**Table 8.1.1: Content harmful to children covered in our guidance**

Section	Primary priority content that is harmful to children (PPC)	Kind of harmful content, as defined in the Act
1	Pornographic content	Pornographic content <sup>1386</sup> , other than content which – <ul style="list-style-type: none"> <li>(c) Consists only of text, or</li> <li>(d) Consists only of text accompanied by-                             <ul style="list-style-type: none"> <li>(vi) Identifying content which consists only of text;</li> <li>(vii) Other identifying content which is not itself pornographic content;</li> <li>(viii) A GIF which is not itself pornographic content;</li> <li>(ix) An emoji or other symbol, or</li> <li>(x) Any combination of content mentioned in subparagraphs (i) to (iv).<sup>1387</sup></li> </ul> </li> </ul>
2	Suicide content	Content which encourages, promotes or provides instructions for suicide. <sup>1388</sup>
3	Self-injury content	Content which encourages, promotes or provides instructions for an act of deliberate self-injury. <sup>1389</sup>
4	Eating disorder content	Content which encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder. <sup>1390</sup>
5	Content which is abusive or incites hatred	Content which is abusive and which targets any of the following characteristics – <ul style="list-style-type: none"> <li>(g) Race;</li> <li>(h) Religion;</li> <li>(i) Sex;</li> <li>(j) Sexual orientation;</li> <li>(k) Disability, or</li> <li>(l) Gender reassignment.<sup>1391</sup></li> </ul> Content which incites hatred against people – <ul style="list-style-type: none"> <li>(d) Of a particular race, religion, sex or sexual orientation;</li> <li>(e) Who have a disability, or</li> <li>(f) Who have the characteristic of gender reassignment.<sup>1392</sup></li> </ul>
6	Violent content	Content which encourages, promotes or provides instructions for an act of serious violence against a person. <sup>1393</sup> Content which – <ul style="list-style-type: none"> <li>(c) Depicts real or realistic serious violence against a person;</li> <li>(d) Depicts the real or realistic serious injury of a person in graphic detail.<sup>1394</sup></li> </ul>

<sup>1386</sup> Section 61(2) of the Act.

<sup>1387</sup> Section 61(6) of the Act.

<sup>1388</sup> Section 61(3) of the Act.

<sup>1389</sup> Section 61(4) of the Act.

<sup>1390</sup> Section 61(5) of the Act.

<sup>1391</sup> Section 62(2) of the Act.

<sup>1392</sup> Section 62(3) of the Act.

<sup>1393</sup> Section 62(4) of the Act.

<sup>1394</sup> Section 62(6) of the Act.



Section	Primary priority content that is harmful to children (PPC)	Kind of harmful content, as defined in the Act
		Content which — (d) Depicts real or realistic serious violence against an animal; (e) Depicts the real or realistic serious injury of an animal in graphic detail; (f) Realistically depicts serious violence against a fictional creature or the serious injury of a fictional creature in graphic detail. <sup>1395</sup>
7	<b>Bullying content</b>	Bullying content. <sup>1396</sup> Content may, in particular, be bullying content if it is content targeted against a person which — (d) Conveys a serious threat; (e) Is humiliating or degrading; (f) Forms part of a campaign of mistreatment. <sup>1397</sup>
8	<b>Dangerous stunts and challenges content</b>	Content which encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it or to someone else. <sup>1398</sup>
9	<b>Harmful substances content</b>	Content which encourages a person to ingest, inject, inhale or in any other way self-administer— (c) A physically harmful substance; (d) A substance in such a quantity as to be physically harmful. <sup>1399</sup>

8.1.8 The contents of this document intend to provide services with helpful guidance on which to make judgements on PPC and PC, rather than an attempt to anticipate every circumstance which may arise during content moderation. This guidance also includes further contextual information for services to assist when assessing particular content types.

8.1.9 Section 192 of the Act sets out the approach to be taken where either a system or process operated or used by a service to comply with the Act, or a risk assessment, involves a judgement by the service about whether content is harmful to children. In summary, such judgements are to be made on the basis of all relevant information reasonably available to the provider.

8.1.10 Within each section, we also set out a short list of key terms to assist services to determine what is meant by frequently used terms within the relevant section or those terms listed in the Act. For terms that apply across the Guidance, please see Section 9.

<sup>1395</sup> Section 62(7) of the Act.

<sup>1396</sup> Section 62(5) of the Act.

<sup>1397</sup> Section 62(12) of the Act.

<sup>1398</sup> Section 62(8) of the Act.

<sup>1399</sup> Section 62(9) of the Act.

## Non-designated Content

- 8.1.11 In addition to the PPC and PC content categories set out above (designated harms), the Act defines a further kind of content that is harmful to children, namely Non-designated Content (NDC).
- 8.1.12 Non-designated Content ensures that services consider types of content that may be harmful to children beyond the designated harms specified by the Act. Please refer to Volume 4, Section 12, Children’s Risk Assessment Guidance, for further detail on how services should consider NDC with regard to their Children’s Risk Assessments and the duties that apply to services to report the kinds and incidence of NDC. Services should consult the Children’s Register of Risks (Section 7.9) when assessing potential NDC.<sup>1400</sup>

## Services’ duties regarding content that is harmful to children

---

- 8.1.13 The Act creates new legal duties for services likely to be accessed by children in relation to content that is harmful to them.
- 8.1.14 The duties include, amongst others, a duty on user-to-user services likely to be accessed by children to operate a service using proportionate systems and processes designed to prevent children of any age from encountering PPC that is harmful to children and to protect children in age groups judged to be at risk of harm from PC and NDC from encountering it.<sup>1401</sup> Search services likely to be accessed by children are subject to a duty to use proportionate systems and processes designed to minimise the risk of children of any age encountering PPC and minimise the risk of children in age groups judged to be at risk of harm from PC and NDC from encountering it.<sup>1402</sup>
- 8.1.15 This Guidance serves as a guide to services where they are required to make a judgement on whether a piece of content is harmful to children, in order to fulfil their duties under the Act.<sup>1403</sup> Such judgements may be required to comply with the requirement to conduct risk assessments regarding content harmful to children under the Children’s Risk Assessments Duty (Volume 4, Section 12), or the requirement to implement measures in order to comply with their Children’s Safety Duties (Volume 5).
- 8.1.16 When services conduct risk assessments and implement measures to comply with the relevant duties, they are likely to be dealing with content in bulk, as opposed to making an assessment on an individual piece of content. Services should anticipate that some of the content they hold is likely to be content that is harmful to children. However, to make decisions for the purposes of compliance with the relevant duties, for example, where

---

<sup>1400</sup> Within the Children’s Register of Risks, our preliminary assessment is that ‘body image content’ and ‘depressive content’ may meet the definition of NDC. If, following our consultation, we consider that we are able to conclude specific kinds of content do meet the definition of NDC in our Register of Risks, we will consider whether it is appropriate to provide examples of those kinds of NDC within this Guidance.

<sup>1401</sup> Section 12(3) of the Act

<sup>1402</sup> Section 29(3) of the Act

<sup>1403</sup> This requirement will only apply where a service, or a part of the service is likely to be accessed by children. Where a service prevents access to a part of a service, for example by implementing Children’s Safety Codes measures AA3 and AA4, content judgements will not be required on that part of the service. Services will only need to consider whether age assurance that is highly effective at correctly determining whether or not a particular user is a child should be applied to that part of the service.

they may relate to content moderation, services will need to take decisions about specific pieces of content. This Guidance will be particularly useful in helping services design their community guidance and content moderation policies to ensure that broad categories of content that are harmful are dealt with appropriately.

- 8.1.17 We recognise that services are likely to be making content moderation judgements in order to comply with the laws of every country in which they operate and that different countries have different laws. This Guidance is not intended to override or supersede existing moderation practices, where these practices already meet the duties set out in the Act. Rather, this Guidance sets out how services need to consider content that is harmful to children in order to comply with the requirements of the children’s safety duties. Please see Volume 5 for more detail.

## Considerations for services assessing content

---

### Overlap with illegal harms

- 8.1.18 Some of the kinds of content harmful to children are closely linked to the offences outlined within the [draft] Illegal Content Judgements Guidance (ICJG). This Guidance on Content Harmful to Children does not, and cannot, set out to definitively demarcate where the line exists between illegal content and content that is harmful to children (within the meaning of the Act). It is also not the purpose of this Guidance to re-iterate material that is captured within the ICJG. Content that we consider to be illegal content, as outlined in the ICJG, is excluded from our examples in this Guidance.
- 8.1.19 Ofcom recognises that making distinctions between illegal content and content that is harmful to children can be difficult. Services should be mindful that different safety duties apply to content that is illegal, and that these duties apply to all users. Where services are considering content that could fall in scope of the definitions of content that is harmful to children, but have reasonable grounds to infer that content is illegal, they should apply the illegal content safety duties as these will provide the greatest level of protection to all users, including children, in accordance with the Act.
- 8.1.20 We have provided comprehensive guidance on how services should make illegal content judgements. Where categories of PPC or PC are associated with illegal content, within each section we set out the circumstances in which content may be illegal and signpost to the ICJG. Services should refer to this to understand the criteria for illegality in full.
- 8.1.21 Services should keep in mind that, as set out in our [Illegal Harms Consultation](#), Ofcom is still due to consult on some aspects of the ICJG (animal cruelty). We will review the proposed drafting of this Guidance in the light of that consultation and if we believe any changes are needed, we will set those out.

### Contextual factors

- 8.1.22 It may not always be clear whether content does or does not meet the definitions of PPC, PC or NDC. We encourage services to take care in instances in which it may not be immediately clear whether content meets the definition of PPC or PC and give due regard to contextual factors which might be important in determining whether or not content should be treated as a form of content that is harmful to children. In particular, this assessment may depend on contextual factors relating to the nature of the content, or

how it is presented on the service. This could include any codewords, substitute terms and phrases, hashtags, sounds and comments that might relate to it, as well as other relevant information reasonably available to the provider, such as other information about the user who has shared the content in question or how it has been shared, such as the group, channel or community on which it has been shared.

- 8.1.23 Within each section we set out the key contextual considerations that services should look out for when assessing different kinds of content that is harmful to children. For example, while an underlying image or video posted to the service may not meet the definition of content that is harmful to children when considered in isolation, we explain that in some cases the hashtags or trending songs that accompany it may indicate that it is in fact, a kind of content that is harmful to children.
- 8.1.24 For example, it is not always immediately clear whether ‘recovery content’, which we refer to in our suicide, self-injury and eating disorder sections, will meet the definition of PPC. Recovery content presents a particular challenge in this regard because while some of this content may serve a valid purpose to individuals in allowing self-expression and aiding their recovery, it may still be harmful to children yet not meet the definitions of PPC under the Act. However, in some instances, it can be a vector for harm in that, where it may be intended to be, or is presented or described as, recovery content, it contains features of harmful content.
- 8.1.25 ‘Recovery forums’ can be some of the highest risk areas for content that is harmful to children (please see Section 7 of this volume). Harmful content which might otherwise present to be recovery related may be shared by those with little medical or professional expertise in the context of suicide, self-harm and eating disorders, and who are themselves suffering with poor mental health. In addition, posts that are not themselves harmful may attract comments that encourage others to engage in suicide, self-harm or behaviours associated with eating disorders, for example because they provide instructions for or explain methods tried by other users. Some recovery content may, therefore, meet the definition of PPC that is harmful to children even where the person who shares it does not intend to be harmful.
- 8.1.26 Services should therefore recognise that there is a balance to be struck in distinguishing the circumstances in which content may or may not meet the definitions under the Act. Services should consider the contextual considerations set out within each section of this Guidance which may assist with assessments of different kinds of content which may be borderline.
- 8.1.27 In some instances, there may be overlaps between some categories of PPC and/or PC and other categories of PPC and/or PC. For example, suicide content may overlap with other categories of content, such as dangerous stunts and challenges content or harmful substances content, where online challenges dare children to carry out lethal self-harm or suicide methods (see Sections 8.9 and 8.10).

## Freedom of expression

---

- 8.1.28 Ofcom must carry out its functions compatibly with the Human Rights Act 1998, including the rights to freedom of expression. Any limitation on the right to freedom of expression must be prescribed by law, pursue a legitimate aim and be necessary in a democratic society. In order to be ‘necessary’, the restriction must correspond to a pressing social need, and it must be proportionate to the legitimate aim pursued. Both the definition of content that is harmful to children and the requirement for Ofcom to prepare this guidance are set out in the Act and pursue the legitimate aim of protecting children from harm online. Ofcom has had careful regard to these rights in producing this Guidance.
- 8.1.29 It is open to services as a commercial matter (and in the exercise of its own right to freedom of expression) to allow or prohibit content that is harmful to children, so long as they abide by the Act. For example, some services likely to be accessed by children may choose to allow particular types of PPC on a service. It is open to them to do this. This guidance is intended to help services identify particular content types to ensure that, regardless of whether it may or may not be prohibited on a service, they take appropriate measures to ensure that the relevant children’s safety duties are met, and child users are protected or prevented from encountering such content.
- 8.1.30 Services should be mindful that sections 22 and 33 of the Act set out that when services are deciding on implementing safety measures and policies, they should have a particular regard to user’s rights of freedom of expression. By virtue of including examples within this Guidance that do attract protection under the Human Rights Act 1998, we are not suggesting that these forms of content should be taken down or disallowed from the service. Rather, that such content should be treated in accordance with the relevant duties (as explained above).

## Journalistic content and content of democratic importance

- 8.1.31 Journalistic content and content of democratic importance as defined in the Act<sup>1404</sup> could potentially meet the definition of one of more kinds of PPC or PC.
- 8.1.32 The Act sets out that ‘journalistic content’ includes ‘news publisher content’.<sup>1405</sup> While journalistic content is subject to the Part 3 duties relating to protection of children, news publisher content is exempt from these duties (as well as the duties that apply to illegal content).<sup>1406</sup> We therefore focus on the broader category of ‘journalistic content’ in this Guidance.
- 8.1.33 When determining whether content is news publisher content or journalistic content and is therefore subject to the Part 3 duties, services should refer to the relevant statutory definitions<sup>1407</sup> and, in particular, consider the source and purpose of content.
- 8.1.34 If the protection of children duties do not apply, for example, where content is produced by a recognised news publisher, services are not expected to take any further action.

---

<sup>1404</sup> Section 17(7) and Section 20(10) of the Act.

<sup>1405</sup> Section 19(10(a)) of the Act.

<sup>1406</sup> Sections 55 and 56 of the Act. News publisher content is excluded from the definition of regulated user-generated content in the Act and is therefore not subject to the safety duties about protecting children and illegal content.

<sup>1407</sup> Section 56 and Section 19(10).

- 8.1.35 If the protection of children duties do apply, for example, where content is produced by the likes of freelance or citizen journalists, services should then consider whether the content meets the definition of content that is harmful to children as explained in the sections to follow or alternatively apply the provisions of their terms or publicly available statements, where such provisions are broad enough to cover such content . Further, services should consider their sections 22 and 33 duties as set out above.
- 8.1.36 We will be issuing a code of practice on how Category 1 services should treat journalistic content and content of democratic importance, along with guidance on news publisher content in due course.

## 8.2 Guidance on pornographic content

**Warning: this section contains references to content that may be upsetting or distressing, including discussions of sexual violence.**

This chapter provides examples of the content or kinds of content that Ofcom considers to be or considers not to be pornographic content. Pornographic content means content of such a nature that it is reasonable to assume that it was produced solely or principally for the purpose of sexual arousal.

### Considerations for services

---

- 8.2.1 This guidance is required in relation to duties for user-to-user and search services under Part 3 of the Online Safety Act 2023 ('the Act').<sup>1408</sup> Pornographic content that is published or displayed on an online service by the provider of the service is subject to different duties under Part 5 of the Act, and Ofcom has published [draft Guidance for providers of this content](#). This distinction between Part 3 and Part 5 is due to how the content is shared, published or displayed rather than differences in the content itself. Therefore, the examples of content or kinds of content that fit into the category of 'Pornographic content' will be the same for Part 3 and 5.

### Relevant Illegal Content

- 8.2.2 We have provided comprehensive guidance on how services should make illegal content judgements in relation to a range of sexual offences in the draft Illegal Content Judgements Guidance ("ICJG")<sup>1409</sup> published as part of our [Illegal Harms Consultation](#), and services should refer to this to understand the criteria for illegality in full.
- 8.2.3 Broadly, content may be illegal where there are reasonable grounds to infer that it:
- a) Includes material which meet the definition of 'extreme pornography', (see 'extreme pornography' offence in the ICJG.) Extreme pornography includes material which is grossly offensive, disgusting, or obscene material; and possesses one of the following characteristics:
    - i) portrays acts which threaten someone's life or which would result in serious injury to breasts, anus or genitals;
    - ii) involves sexual interference with a human corpse or animal; or
    - iii) involves non-consensual penetration.
  - b) Involves the non-consensual disclosure of, or threats to disclose, an intimate image (see 'intimate image abuse' offence in the ICJG);

---

<sup>1408</sup> Section 53 of the Act.

<sup>1409</sup> Ofcom, 2023, [Illegal Content Judgements Guidance](#)



- c) Involves a user intentionally sending a photograph or film of genitals for the purposes of causing alarm, distress or humiliation or for the purpose of obtaining sexual gratification (see ‘cyberflashing’ section in the ICJG).
- 8.2.4 In addition, images or videos which show a child engaged in sexual activity, or appearing to be engaged in sexual activity, constitute child sexual abuse material (CSAM) which is illegal content (see offences related to indecent and prohibited images of a child in the ICJG on CSAM).
- 8.2.5 Pornographic content may also be used in the commission of illegal offences, including as part of the grooming process, to coerce a child into performing sexual acts, or causing a child to watch a sexual act for the purposes of sexual gratification. Guidance for identifying these offences online can also be found in our draft Guidance on judgement for Illegal Content.

## Key terms

**Table 8.2.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Sexual activity</b>	Depictions of consensual sexual acts such as masturbation, oral sex, penetration or ejaculation in a sexualised context.
<b>Pornographic content</b>	<p>Pornographic content means content of such a nature that it is reasonable to assume that it was produced solely or principally for the purpose of sexual arousal. <sup>1410</sup></p> <p>For the purposes of the Act, pornographic content that is harmful to children specifically excludes content that (a) consists only of text (i.e. written material) <sup>1411</sup> or; (b) consists only of text and is accompanied by identifying content (that may be text or another kind of content which is not itself pornographic), non-pornographic GIFs, emojis or other symbols, or any combination of these <sup>1412</sup>.</p>

## Additional context for services

- 8.2.6 The key test for whether content is pornographic is whether it is reasonable to assume that it was produced ‘solely or principally’ for the purpose of sexual arousal. Whether content can be assumed to have been produced either solely or principally for the purpose of sexual arousal is dependent on the nature of the content itself, having taken contextual factors into account, rather than the intent of the uploading user or any viewer of it.

<sup>1410</sup> Section 236(1) of the Act.

<sup>1411</sup> Section 61 (6)(a) of the Act.

<sup>1412</sup> Section 61 (6)(b)(i) – (v) of the Act.

8.2.7 The presence and combination of particular elements within content will make it more or less likely for the content to be deemed as having the principal or sole purpose of sexual arousal, these elements include:

- **More likely:**
  - Presence of nudity, especially full frontal or detailed breast or genital nudity
  - References to or depictions of fetish material
  - Depictions of real sexual activity
  - Very strong references to sexual behaviour:
    - Use of language associated with sexual activity and pornography e.g. “milf”, “horny”
    - Simulations or suggestions of sexual activity, e.g. simulations of oral sex or sexually suggestive moaning
    - Depictions of symbols or objects associated with sex e.g. sex toys.
- **Less likely:**
  - A clear alternative purpose for the content, such as an artistic, dramatic, educational or other non-sexual purpose
  - A lack of nudity or semi nudity, or the individuals in the content are clothed and not in underwear or fetish clothing.

8.2.8 Assessments of content should be holistic. For example, content may depict individuals who are fully-clothed, but if they are simulating sexual activity and using pornographic language, without indication of a clear alternative purpose for the content, this should be deemed as pornographic content. However, if content depicts an individual using pornographic language but they are fully clothed and not carrying out or simulating sexual activity this would likely not be judged to be pornographic.

8.2.9 For content to be considered pornographic rather than sexually suggestive, the references to sexual behaviour must be strong, such that it is clear and obvious that the content is intended for the purpose of sexual arousal. This purpose can often be identified through a combination of factors, such as nudity or partial nudity or references to fetish material. Similarly, references to common fetishes may not be sufficient for content to be clearly intended for sexual arousal. For example, an image of an individual’s feet without any other indicators that the purpose of the image is for sexual arousal could feasibly be for an alternative purpose and should not be considered pornographic content. However, when combined with additional factors, such as the presence of nudity or partial nudity, suggestions or simulations of sexual activity or use of pornographic or sexual language could contribute to the overall judgement that content is pornographic.

8.2.10 Content that would be classified as pornographic by the British Board of Film Classification (BBFC) or Ofcom when appearing on other forms of regulated media, should be considered pornographic when shared by users. This might include:

- A clip from television depicting graphic simulations of sexual activity clearly intended to elicit sexual arousal; a clip from a film rated R18<sup>1413</sup> or Sex work at 18<sup>1414</sup> by the BBFC;

---

<sup>1413</sup> [BBFC r18 rating](#) [accessed 16 April 2024]

<sup>1414</sup> [BBFC 18 rating](#) [accessed 16 April 2024]

- A clip that would be deemed Adult Sex Material by Ofcom when appearing on broadcast television or On-demand programme service providers;<sup>1415 1416</sup>
- A photograph that would be deemed sexual content unsuitable for under 18s when accessed via a Mobile Network.<sup>1417</sup>

8.2.11 Pornographic content may include **artificial images**, for example:

- AI generated images;
- Animated images or videos, such as from video games, hentai or cartoons, depicting detailed nudity; and
- Paintings, drawings or other non-photographic images.

## Examples

---

### Examples or kinds of content that Ofcom considers to be pornographic content that is harmful to children

- 8.2.12 The below table describes the kinds of pornographic content that Ofcom considers meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.2.13 We have not addressed the level or impact of harm within the below table. For further information on the risks and impact of harm, please see Section 7.1 in this Volume.
- 8.2.14 Services should keep in mind that the below kinds of content **must** be solely or principally for the purposes of sexual arousal, in accordance with the definition of pornographic content in the Act. If the content is not for the purposes of sexual arousal, and is instead for a medical, educational, artistic or other non-sexual purpose, it will not meet the definition of pornographic content in the Act.
- 8.2.15 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

---

<sup>1415</sup> The Ofcom Broadcasting Code (2021) [Section one: Protecting under-eighteens](#) [accessed 16 April 2024]

<sup>1416</sup> Ofcom (2021) [On-demand programme services \(“ODPS”\) guidance](#) [accessed 16 April 2024]

<sup>1417</sup> [The BBFC Mobile Content Framework](#) [accessed 16 April 2024]

**Table 8.2.2: Descriptions and examples of pornographic content that is harmful to children**

Content description	Content examples
<b>Explicit depictions of sexual activity</b>	<ul style="list-style-type: none"> <li>• Depictions of sexual acts such as masturbation, oral sex, penetration or ejaculation, including where these acts are performed with or on a sex toy.</li> </ul>
<b>Content depicting full frontal nudity or depicting genitals, breasts or buttocks to elicit sexual arousal</b>	<ul style="list-style-type: none"> <li>• Any content focusing on the breasts, genitals or buttocks or depicting full frontal nudity.</li> <li>• Videos showing an individual with exposed or partially exposed genitals, breasts or buttocks where they are using language associated with sexual activity or pornography e.g. “milf” or “horny”, or strongly suggesting sexual activity e.g. moaning or simulating masturbation or oral sex.</li> <li>• An autonomous sensory meridian response (ASMR) video where sexually suggestive sounds are combined with nudity.</li> </ul>
<b>Fetish material</b>	<ul style="list-style-type: none"> <li>• Depictions of an individual with their breasts, buttocks or genitals exposed depicting bondage or BDSM, or any other fetish depictions.</li> <li>• Depictions of an individual being whipped or restrained containing language associated with sexual activity or pornography e.g. “milf” or “horny”, or other strong suggestions of sexual activity e.g. moaning or simulating sexual activity.</li> </ul>

## Examples or kinds of content that Ofcom considers not to be pornographic content that is harmful to children

- 8.2.16 The below table describes the kinds of pornographic content that Ofcom does not consider to meet the definition under the Act, along with a non-exhaustive list of examples.
- 8.2.17 The below kinds of content are either (a) out of scope (text-based content that is expressly excluded in the Act, or (b) deemed to be content for which it is reasonable to assume the sole or principal purpose is not sexual arousal.
- 8.2.18 Services should be mindful that the below examples must not be for the sole or principal purposes of arousal. If the primary purpose is artistic, for example, content won’t meet the definition under the Act.
- 8.2.19 Examples of sexualised content or content depicting nudity that do not meet the definition of pornographic content may still be inappropriate for children of certain age groups.

**Table 8.2.3: Descriptions and examples of content that are not pornographic**

Content description	Content examples
<p><b>Text based content of a sexual nature. This includes text-based content of a sexual nature accompanied by GIFs (that are not sexual in nature), emojis or symbols.</b></p>	<ul style="list-style-type: none"> <li>• Written erotica or fan fiction.</li> <li>• A non-sexualised emoji or GIF alongside text-based content of a sexual nature.</li> </ul>
<p><b>Glamour content whose primary purpose falls short of sexual arousal, but may have suggestive intentions</b></p>	<ul style="list-style-type: none"> <li>• A video of someone playing a video game in swimwear.</li> <li>• Sexualised or suggestive content of a kind that might be expected to feature in an advertisement.</li> <li>• Sexually suggestive autonomous sensory meridian response (ASMR) video streams with sexually suggestive sounds (but without nudity).</li> </ul>
<p><b>Content depicting partial or full nudity in a non-sexual context</b></p>	<ul style="list-style-type: none"> <li>• Content depicting breastfeeding.</li> <li>• Content depicting nudity for a comedic or satirical purpose.</li> <li>• Journalistic content including images of non-sexual nudity.</li> </ul>
<p><b>Educational material which includes imagery of, or discussion about, anatomy, nudity or sexual activity</b></p>	<ul style="list-style-type: none"> <li>• Anatomical diagrams.</li> <li>• Content intended for the sex education of children.</li> <li>• Depictions of penetration in a medical context e.g. a demonstration of an intimate examination.</li> </ul>
<p><b>Dramatic or comedic content where nudity or sexual activity is secondary to the dramatic or comedic purpose of the content</b></p>	<ul style="list-style-type: none"> <li>• Depictions of nudity or sexual activity that is not shown in graphic detail and where a comedic or dramatic purpose is clear.</li> <li>• A clip of a sex scene from film or television, where the sexual activity is not shown in graphic detail<sup>1418</sup> and the dramatic purpose is evident through a combination of factors such as the inclusion of a storyline. Context is included to make clear the content is part of a film or television programme or the sexual activity is obviously simulated.</li> </ul>

<sup>1418</sup> In line with the BBFC 15 classification see [BBFC 15 rating](#) [accessed 16 April 2024]

Content description	Content examples
<p><b>Artwork featuring nudity or sexual activity where the primary purpose is artistic</b></p>	<ul style="list-style-type: none"> <li>• Content depicting sexually suggestive dancing or acrobatics e.g. dancing in music videos, pole dancing or aerial acrobatics.</li> <li>• An image of a painting, sculpture, photograph or other artwork containing nudity.</li> </ul>
<p><b>Content associated with common or known fetishes, but that is not graphic or overtly sexual in nature.</b></p>	<ul style="list-style-type: none"> <li>• Videos or images of feet with no additional context to suggest a sexual purpose.</li> <li>• Depictions of individuals in commonly sexualised fancy dress e.g. furrries, nurses, maids, butlers, police officers.</li> </ul>

## 8.3 Guidance on suicide content

**Warning: this section contains references to content that may be upsetting or distressing, including detailed discussion and descriptions of suicide and examples of suicide content.**

This section provides examples of the content or kinds of content that Ofcom considers to be or considers not to be content which encourages, promotes or provides instructions for suicide.<sup>1419</sup> This is referred to as suicide content.

### Considerations for services

---

- 8.3.1 People who are posting or interacting with suicide content may be in vulnerable or difficult circumstances. We are conscious of the stigma which may be associated with suicidal ideation and that this may present a barrier to individuals seeking help. It is important for children to have the opportunity to access and share content about their mental health. We have tried to be mindful of this when developing this guidance and would strongly recommend services look at Sections 7-7.15 of this consultation (which constitute our Children’s Register of Risks) in conjunction with this guidance chapter to understand in more detail the sensitivities around this content.
- 8.3.2 Ofcom does not expect services to unduly restrict children’s access to genuine safety promoting, non-harmful information and resources relating to suicide.

### Relevant illegal content

- 8.3.3 Suicide content may be illegal in some circumstances. Broadly, content should be considered as illegal suicide content where there are reasonable grounds to infer that it amounts to an offence of intentionally encouraging or assisting the suicide of another person.<sup>1420</sup>
- 8.3.4 We have provided comprehensive guidance on how services should make judgements in relation to illegal suicide content in the ‘Encouraging or assisting suicide’ section of the draft Illegal Content Judgements Guidance (‘ICJG’)<sup>1421</sup> published as part of our [Illegal Harms Consultation](#). Services should refer to that Guidance to understand the criteria for illegality in full.

---

<sup>1419</sup> Section 61(3) of the Online Safety Act 2023 (‘the Act’).

<sup>1420</sup> Section 2 of the Suicide Act 1961; Section 13 of the Criminal Justice Act (Northern Ireland) 1966.

<sup>1421</sup> Ofcom, 2023. [Illegal Content Judgements Guidance](#).



## Key terms

**Table 8.3.1 Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Encourages</b>	<p>Content which could persuade others to contemplate suicide and/or make others more likely to attempt or consider suicide as a course of action.</p> <p>This includes content which glamourises, glorifies, romanticises or normalises suicide.</p> <p>Unlike illegal suicide content (please refer to the ICJG), suicide content that is harmful to children does not need to encourage intentionally or deliberately.</p>
<b>Promotes</b>	<p>Content which publicises, supports, or recommends suicide as an act (this does not need to be intentional or explicit).</p> <p>This includes content which glamourises, glorifies, romanticises or normalises suicide.</p>
<b>Provides instructions for</b>	<p>Content which describes a method for suicide in sufficient detail (such as setting out steps or diagrams) that can be emulated.</p>
<b>Suicide</b>	<p>The act of an individual intentionally ending their own life.</p>

## Additional context for services

- 8.3.5 In some instances, there may be overlaps between suicide content and other categories of content such as dangerous stunts and challenges content, or harmful substances content. This could include online challenges which dare children to carry out lethal self-harm or suicide methods. (see Guidance on Harmful substances content (Section 8.9) and Guidance on dangerous stunts and challenges content (Section 8.10) for more detail).
- 8.3.6 Services should also be mindful where content relating to suicide provides safety promoting resources and should ensure that children are able to access resources from genuine support services. Children should be able to access responsible, health-promoting information about, and support for, suicidal ideation.
- 8.3.7 Services should also carefully consider recovery content when making judgements. Recovery content can take different forms for different users and can play an important role in providing hope and challenging stigmas. However, some content which is intended to be or is presented as ‘recovery content’ will nevertheless be harmful to children. Services should be aware that:
- a) Some children, including those in crisis or who are particularly vulnerable, are more likely to be encouraged or instructed by some recovery content regardless of the

- intention behind the post. This could include detailed documentations of recovery journeys which could provide instructions for suicide.
- b) Harmful comments may be posted on genuine recovery content, for example when users ‘takeover’ a user’s post and flood it with harmful comments about suicide.
  - c) Harmful content about suicide may be posted in genuine recovery forums, groups or communities.
- 8.3.8 In addition, services should be aware that the presentation of suicide content develops quickly and evolves rapidly which can enable such content to evade content moderation. This can include the use of codewords and hashtags employed by users to signal and search for suicide and self-harm content. Often, these terms can be specific to a particular service. Some content may also adapt commonly-used terms to obscure the content (for example, intentional misspelling/leet<sup>1422</sup>, algospeak<sup>1423</sup>, use of acronyms, the adoption of coded words originating in popular culture). Services should therefore keep in mind that while a post might not explicitly suggest suicide, it could be accompanied by more suggestive comments, captions or hashtags which indicate that the content does in fact meet the definition of suicide content.
- 8.3.9 Services should take care when assessing artistic representations of suicide and self-harm, for example, music, poetry, artwork or fictional works, drawings, stories, paintings and other art. These may romanticise or glamourise suicide in a way that is harmful to children. We are mindful of the need to consider freedom of expression. However, where content meets the definition of suicide content under the Act, then it should be treated as suicide content, regardless of the format. Services should therefore focus on whether the content meets the definition under the Act.

## Examples

---

### Examples or kinds of content that Ofcom considers to be suicide content that is harmful to children

- 8.3.10 Table 8.3.2 below describes the kinds of suicide content that Ofcom considers meets the definition in the Act, along with a non-exhaustive list of examples.
- 8.3.11 We have not addressed the level or impact of harm within the below table. For further information on the impact of suicide content, please see Section 7.2 in this Volume.
- 8.3.12 Services should keep in mind that, in accordance with the Act, the kinds or types of content listed *must* encourage, promote, or provide instructions for suicide, but do not need to do so intentionally.
- 8.3.13 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

---

<sup>1422</sup> Leet speak or ‘l337 speak’ refers to an informal online language where numbers or special characters are used to replace vowels or consonants.

<sup>1423</sup> Algorithm speak or ‘algorithmspeak’ refers to coded language used online in order to circumvent content moderation methods.

**Table 8.3.2: Descriptions and examples of content which encourages, promotes or provides instructions for suicide**

Content descriptions	Content examples
<p><b>Content describing methods of suicide</b></p>	<ul style="list-style-type: none"> <li>• A post describing methods of suicide as: pain-free, quick, instant, easy or common.</li> <li>• A post describing an unusual, emerging or novel method of suicide.</li> <li>• A post describing particular methods as not leaving a lasting effect on the body should a suicide attempt not result in death, or as not being traceable.</li> <li>• A video recommending specific places where individuals have taken their own life.</li> </ul>
<p><b>Content containing detailed instructions for methods of suicide</b></p>	<ul style="list-style-type: none"> <li>• A post containing descriptions or depictions of detailed steps to carry out a particular method for suicide, such as a step-by-step guide.</li> <li>• A post describing lethal substances and other details such as dosages or how to obtain them to use for suicide.</li> <li>• Descriptions of an individual’s personal account of how they could or plan to (attempt to) take their own life.</li> </ul>
<p><b>Content, such as internet challenges or dares, instructing suicide</b></p>	<ul style="list-style-type: none"> <li>• Online challenges that dare or otherwise encourage users to engage in lethal self-harm or suicide methods.</li> <li>• Discussions of suicide pacts in comments or discussion forums where users encourage each other to take their own lives.</li> </ul>
<p><b>Content featuring real-life suicides or suicide attempts</b></p>	<ul style="list-style-type: none"> <li>• Livestreaming or pre-recorded content that shows any individual actively preparing to take their own life. This could include them discussing their plans in detail or preparing accessories, or tools for suicide.</li> <li>• Images of individuals where it is clear the individual has died by suicide e.g. the method is depicted.</li> </ul>

## Examples and kinds of content that Ofcom **considers not to be** suicide content that is harmful to children

- 8.3.14 Table 8.3.3 below describes the kinds of suicide content that Ofcom considers not to meet the definition of Primary Priority Content under the Act, along with a non-exhaustive list of examples.
- 8.3.15 Where content that promotes recovery or awareness of suicide and does not contain any of the content listed above in Table 8.3.2 this may not be considered Primary Priority Content.<sup>1424</sup>

**Table 8.3.3: Descriptions and examples of content which is not content that encourages, promotes or provides instructions for suicide.**

Content description	Content examples
<b>Brief descriptions or mentions of suicide methods where the description is limited, the method is well known, and the content does not otherwise encourage or promote</b>	<ul style="list-style-type: none"> <li>Content which includes limited details such as “my uncle took his own life”.</li> </ul>
<b>Content which promotes recovery and awareness of suicide in a healthy, non-harmful way and/or which reduces stigma</b>	<ul style="list-style-type: none"> <li>Discussions of healthy coping mechanisms.</li> <li>Descriptions of signs that a person may be experiencing suicidal ideation and how to assist them.</li> <li>Explanations of how to talk about suicide in a non-stigmatising and safe way.</li> <li>Information about how and where to seek further help.</li> <li>Facts and statistics about suicide (but not methods).</li> <li>Individuals discussing their own recovery, or seeking support.</li> </ul>
<b>Safety promoting resources which provide healthy coping mechanisms or signpost to services for recovery</b>	<ul style="list-style-type: none"> <li>Content from recognised suicide prevention bodies, such as charity resources and sites.</li> <li>NHS website, NICE clinical guidelines and other recognised medical resources.</li> <li>Government suicide prevention material.</li> <li>Resources which encourage individuals to seek help or speak to someone, or refer individuals to places that they can seek help.</li> </ul>
<b>Academic or educational articles</b>	<ul style="list-style-type: none"> <li>Articles related to suicide rates, or suicide prevention methods.</li> </ul>

<sup>1424</sup> Recovery spaces are high risk for attracting suicide content. Services likely to host recovery spaces will need to consider how to detect suicide content and prevent children from encountering it, including in recovery spaces should it arise.

<b>Content description</b>	<b>Content examples</b>
<b>Content that discusses belief and hope in, for example, afterlife, heaven or eternal life in a religious or spiritual context</b>	<ul style="list-style-type: none"><li>• A post expressing a wish or belief that an individual who has died by suicide is in a better place.</li></ul>
<b>Political or policy discussions</b>	<ul style="list-style-type: none"><li>• Content debating or discussing assisted dying.</li></ul>

## 8.4 Guidance on self-harm content

**Warning: this section contains references to content that may be upsetting or distressing, including detailed discussion and descriptions of self-harm and examples of harmful content.**

This chapter provides examples of the content or kinds of content that Ofcom considers to be or considers not to be content which encourages, promotes or provides instructions for an act of deliberate self-injury.<sup>1425</sup> This is referred to as self-harm content.

### Considerations for services

---

- 8.4.1 Throughout this chapter and the rest of this consultation, we mostly use the established and widely understood term “self-harm” to refer to “an act of deliberate self-injury” as specified in the Act.
- 8.4.2 People who are posting or interacting with self-harm content may be in vulnerable or difficult circumstances. We are conscious of the stigma which may be associated with self-harm and that this may present a barrier to individuals seeking help. It is important for children to access and share content about their mental health and we have been mindful of this when developing this guidance. We also expect services to review Sections 7-7.15 of this consultation (which constitute our Children’s Register of Risks) in conjunction with this guidance to better understand the sensitivities around this content.
- 8.4.3 Ofcom does not expect services to unduly restrict children’s access to genuine safety promoting, non-harmful information and resources relating to self-harm.

### Relevant illegal content

- 8.4.4 Self-harm content may be illegal in some circumstances. Content should be considered illegal where there are reasonable grounds to infer that it amounts to an offence of intentionally encouraging or assisting an act of serious self-harm (that is, self-harm which would result in grievous bodily harm including psychiatric injury).
- 8.4.5 We have provided comprehensive guidance on how services should make illegal content judgements in relation to self-harm content in the ‘Encouraging or assisting serious self-harm’ section of the draft Illegal Content Judgements Guidance (‘ICJG’)<sup>1426</sup> published as part of our [Illegal Harms Consultation](#). Service providers should refer to this to understand the criteria for illegality in full.

---

<sup>1425</sup> Section 61(4) of the Online Safety Act 2023 (‘the Act’).

<sup>1426</sup> Ofcom, 2023. [Illegal Content Judgements Guidance](#).

## Key terms

**Table 8.4.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Self-injury/self-harm</b>	When someone hurts themselves as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences.
<b>Encourages</b>	<p>Content which could persuade others to contemplate self-harm and/or make others more likely to attempt or consider self-harm as a course of action.</p> <p>Unlike illegal self-harm content (please refer to the ICJG), self-harm content that is harmful to children does not need to encourage intentionally or deliberately.</p>
<b>Promotes</b>	<p>Content which publicises, supports, or recommends self-harm as an act (this does not need to be deliberate or explicit).</p> <p>This includes content which glamourises, glorifies, romanticises or normalises self-harm.</p>
<b>Provides instructions for</b>	Describes a method for self-harm in sufficient detail (such as setting out tools, steps or diagrams) that can be emulated. As with “encourages”, any description of a method of self-harm needn’t deliberately or explicitly provide instructions for self-injury to be harmful to children. Instructions may be minimal and still able to be emulated by children.

## Additional considerations for services

- 8.4.6 In some instances, there may be overlaps between self-harm content and other categories of content such as dangerous stunts and challenges content, or harmful substances content. For example, online challenges which dare children to carry out lethal self-harm or suicide methods. For more information see Sections 8.9 (Harmful substances content) and 8.10 (Dangerous stunts and challenges content).
- 8.4.7 Services should also be mindful where content relating to self-harm provides safety promoting resources and should ensure that children are able to access resources from genuine support services. Children should be able to access responsible, safety-promoting information about, and support for self-harm ideation.
- 8.4.8 Services should also carefully consider recovery content when making judgements. Recovery content can take different forms for different users, and can play an important role in providing hope and challenging stigmas. However, some content which is intended



to be or is presented as recovery content will nevertheless be harmful to children. Services should be aware that:

- a) Some children, including those in crisis or who are particularly vulnerable, are more likely to be encouraged or instructed by some recovery content regardless of the intention behind the post. This could include detailed documentations of recovery journeys which could provide instructions for self-harm, or encouraging users to engage in 'less extreme' forms of self-harm.
- b) Harmful comments may be posted on genuine recovery content, for example when users 'take over' an influencer's post and flood it with harmful comments about self-harm.
- c) Harmful content about self-harm may be posted in genuine recovery forums, groups or communities.

8.4.9 In addition, services should be aware that self-harm content develops quickly and evolves rapidly, which can enable such content to evade content moderation. This can include the use of codewords and hashtags employed by users to signal and search for self-harm content. Often, these terms can be specific to a particular service. Some content may also adapt commonly used terms to obscure the content (for example, intentional misspelling/leet, algospeak, use of acronyms, use of coded adoption of words originating in popular culture). Services should therefore keep in mind that while a post might not explicitly suggest self-harm, it could be accompanied by more suggestive comments or hashtags which indicate that the content does in fact meet the definition of self-harm content.

8.4.10 Services should take care when assessing artistic representations of suicide and self-harm, for example, music, poetry, artwork or fictional works, drawings, stories, paintings and other art. These may romanticise or glamourise self-harm in a way that is harmful to children. We are mindful of the need to consider freedom of expression. However, where content meets the definition of self-harm content under the Act, then it should be treated as self-harm content harmful to children, regardless of the format. Services should therefore focus on whether the content meets the definition under the Act.

## Examples

---

### Examples or kinds of content that Ofcom considers to be self-injury content that is harmful to children

- 8.4.11 Table 8.4.2 below describes the kinds of self-harm content that Ofcom considers meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.4.12 We have not addressed the level or impact of harm within the below table. For further information on the impact of self-harm content, please see Section 7.2.
- 8.4.13 Services should keep in mind that, in accordance with the Act, the kinds or types of content listed *must* encourage, promote, or provide instructions for a deliberate act of self-injury, but do not need to do so intentionally.
- 8.4.14 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

**Table 8.4.2: Descriptions and examples of content which encourages, promotes or provides instructions for an act of deliberate self-injury**

Content description	Content examples
<p><b>Content describing methods of self-harm</b></p>	<ul style="list-style-type: none"> <li>• A post describing a novel or uncommon method of self-harm.</li> <li>• A post describing a particular method of self-harm as easy to do, easy to conceal, quick to heal or unlikely to scar.</li> </ul>
<p><b>Content containing detailed instructions for methods of self-harm</b></p>	<ul style="list-style-type: none"> <li>• A post describing or depicting detailed steps to carry out a particular method of self-harm, whether novel or well-known.</li> <li>• A post providing details about specific tools, substances, and accessories for self-harm and where or how to obtain them.</li> <li>• A post describing an individual’s personal account of how they have, could, or plan to self-harm.</li> </ul>
<p><b>Content, such as internet challenges or dares, instructing self-harm</b></p>	<ul style="list-style-type: none"> <li>• Online challenges that dare or otherwise encourage users to engage in behaviour which may amount to self-harm methods. For example, challenges encouraging self-asphyxiation or encouraging the application of harmful substances to burn the skin.</li> </ul>
<p><b>Content featuring real-life self-harm</b></p>	<ul style="list-style-type: none"> <li>• Images of self-harm wounds, presented without appropriate context. Such images may be accompanied by promotional text.</li> <li>• Livestreaming or pre-recorded content that shows any individual actively preparing to self-harm. This could include discussion of detailed plans or preparing accessories/tools for self-harm.</li> <li>• Livestreaming or pre-recorded content of a person self-harming.</li> </ul>
<p><b>Content which encourages competition in relation to self-harm, or more extreme behaviour related to self-harm</b></p>	<ul style="list-style-type: none"> <li>• Posts or comments which promote or encourage self-harm by suggesting that self-harm is competitive or that certain wounds or methods of self-harm are insufficiently severe. Such posts often use coded language.</li> </ul>

Content description	Content examples
<p><b>Content which represents self-harm in a way which romanticises, glamourises, or normalises, including some fictional content, artwork, poetry and songs</b></p>	<ul style="list-style-type: none"> <li>• Images, including drawings, depicting common accessories for self-harm accompanied by promoting text sounds or hashtags e.g. photo or drawing of scissors with a sound known to indicate self-harm content or alongside hashtags associated with self-harm.</li> <li>• Poems or songs which include details that romanticise, glamourise, or normalise self-harm e.g. describing self-harm as a healthy way of coping with problems.</li> <li>• Fanfiction posts that romanticise, glamourise or normalise self-harm e.g. describing it as a sophisticated or artistic response to problems.</li> </ul>

## Examples or kinds of content Ofcom considers not to be self-injury content that is harmful to children

- 8.4.15 Table 8.4.3 below describes the kinds of self-harm content that Ofcom does not consider meets the definition in the Act, along with a non-exhaustive list of examples.
- 8.4.16 Ofcom does not expect services to unduly restrict children’s access to genuinely safety promoting, non-harmful information and resources relating to self-harm. Where content that promotes recovery and awareness of self-harm and does not contain any of the content listed above in Table 8.4.2 this may not be considered Primary Priority Content.

**Table 8.4.3: Descriptions and examples of content which is not content that encourages, promotes or provides instructions for an act of deliberate self-injury**

Content description	Content examples
<p><b>Brief descriptions or mentions of self-harming method where the description is very limited and well-known</b></p>	<ul style="list-style-type: none"> <li>• A post which discusses someone’s experience of self-harm without detail or commentary on the methods.</li> </ul>
<p><b>Content depicting self-harm healed scars incidentally</b></p>	<ul style="list-style-type: none"> <li>• Content depicting self-harm scars (that have healed) should not be deemed promotional or encouraging, particularly where the content itself is not about self-harm.</li> <li>• Images of an individual which shows some healed scarring on their body but is not the focus of the content.</li> </ul>

Content description	Content examples
<b>Content about concealing healed scars in a recovery context (not concealing active self-harm wounds, accessories or behaviours)</b>	<ul style="list-style-type: none"> <li>• A post which advises how to cover up healed self-harm scars for example with make-up or tattoos.</li> </ul>
<b>Content which promotes recovery and awareness of self-harm in a healthy, non-harmful way and/or which reduces stigma</b>	<ul style="list-style-type: none"> <li>• Discussions of healthy coping mechanisms.</li> <li>• Descriptions of signs that may indicate someone may be self-harming and how to assist them.</li> <li>• Explanations of how to talk about self-harm in a non-stigmatising and safe way.</li> <li>• Information about how and where to seek further help with self-harm.</li> <li>• Facts and statistics about self-harm (but not methods).</li> <li>• Individuals discussing their own recovery or seeking support.</li> </ul>
<b>Safety promoting resources which provide healthy coping mechanisms or signpost to services for recovery</b>	<ul style="list-style-type: none"> <li>• Charity or recognised self-harm prevention bodies' web pages or resources.</li> <li>• NHS information pages, NICE Guidelines and other recognised medical resources.</li> <li>• Resources which encourage individuals to seek help or speak to someone, or refer individuals to places that they can seek help.</li> </ul>
<b>Content which describes or discusses safe ways to deal with negative emotions, feelings of wanting to self-harm, safe alternatives and coping strategies</b>	<ul style="list-style-type: none"> <li>• Descriptions or discussions of ways to recognise triggers.</li> <li>• Descriptions or discussions of how to distract from the urge to self-harm, such as exercise, tidy up or hold ice cubes.</li> <li>• Descriptions or discussions of ways to delay acting on feelings of self-harm, such as wait at least five minutes to see if the urge disappears (increasing the delay over time).<sup>1427</sup></li> </ul>
<b>Discussions or content focused on research, advocacy and support related to self-injury awareness and prevention</b>	<ul style="list-style-type: none"> <li>• Charity and educational sites describing the risks and signs etc. of self-harm.</li> </ul>

<sup>1427</sup> Mind, [Self-harm support](#) [accessed 23 March 2024]

Content description	Content examples
<b>Academic or educational articles</b>	<ul style="list-style-type: none"><li>• Facts and statistics about self-harm which raise awareness and reduce stigma.</li><li>• Articles which do not discuss methods or include instructions, but otherwise research prevalence, incidence and other statistics related to self-harm, or self-harm methods.</li></ul>

# 8.5 Guidance on eating disorder content

**Warning: this section contains references to content that may be upsetting or distressing, including detailed discussion of eating disorders and eating disorder content.**

This section provides examples of the content or kinds of content that Ofcom considers to be or considers not to be content which encourages, promotes, or provides instructions for an eating disorder or behaviours associated with an eating disorder.<sup>1428</sup> This is referred to as eating disorder content.

## Considerations for services

---

- 8.5.1 People who are posting or interacting with eating disorder content may be in vulnerable or difficult circumstances. We are conscious of the stigma which may be associated with eating disorders and that this may present a barrier to individuals seeking help. It is important for children to have the opportunity to access and share content about their mental health and we have been mindful of this when developing this guidance. We also expect services to review Eating disorder content in the Children’s Register of Risks (Section 7.3) in conjunction with this guidance to better understand the sensitivities around this content.
- 8.5.2 Ofcom does not expect services to unduly restrict children’s access to genuine safety promoting, non-harmful information and resources relating to eating disorders.

## Relevant illegal content

- 8.5.3 Content may be considered illegal where it intentionally encourages or assists someone in an act of serious self-harm, including psychiatric injury. This could include instances where individuals are encouraging or assisted to carry out behaviours linked to eating disorders that amount to serious acts of self-harm.
- 8.5.4 We have provided comprehensive guidance on how services should make illegal content judgements in the draft Illegal Content Judgements Guidance (‘ICJG’)<sup>1429</sup> of our [Illegal Harms Consultation](#), and services should refer to this to understand the criteria for illegality in full.

---

<sup>1428</sup> Section 61(5) of the Online Safety Act 2023 (‘the Act’).

<sup>1429</sup> Ofcom 2023. [Illegal Content Judgements Guidance](#)

## Key terms

**Table 8.5.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Eating Disorder</b>	Eating disorders are serious and complex mental illnesses which are characterised by disordered eating behaviour and a preoccupation with food, often accompanied by concerns with body weight or shape. <sup>1430,1431</sup>
<b>Behaviours associated with eating disorders</b>	A non-exhaustive, general list of behaviours commonly associated with eating disorders includes behaviours such as: calorie restriction or fasting, excessive exercise, binge eating, compensatory or purging behaviours, avoidance or restriction of food.
<b>Encourage</b>	<p>Content which recommends, advises, incites, or induces eating disorders, or behaviours associated with an eating disorder.</p> <p>Encouragement could be unintentional or inadvertent. This can include content which glamourises, glorifies, romanticises, or normalises eating disorders.</p>
<b>Promote</b>	<p>Content which publicises, endorses, or portrays eating disorders or behaviours associated with an eating disorder as positive, for example as a coping mechanism or “lifestyle choice”.</p> <p>Promotion could be unintentional or inadvertent. This can include content which glamourises, glorifies, romanticises, or normalises eating disorders.</p>
<b>Provide Instructions for</b>	<p>Content which is instructive in nature. This could detail ‘tips’, ‘methods’, ‘coaching’ or ‘guidance’ specifically related to eating disorders or behaviours associated with eating disorders, regardless of whether the content was intended to encourage such instructions to be followed or not.</p> <p>This can include content which describes eating disorders or behaviours associated with eating disorders in sufficient detail that can be emulated.</p>

<sup>1430</sup> Treasure J., Duarte TA., Schmidt U, 2020. [Eating disorders](#). [accessed 25 March 2024]

<sup>1431</sup> World Health Organisation, 2019. [International Classification of Diseases, Eleventh Revision](#) [accessed 25 March 2024]



## Additional context for services

- 8.5.5 Services should be aware of the different types of behaviours associated with eating disorders as this can then inform their judgements. For example, eating disorders can present differently across different genders, with between a quarter and a third of those affected by eating disorders being men and boys. Services should also be aware of eating disorder presentations, such as binge eating disorder, which are lesser known or under-researched. For more information see the Eating disorder content in the Children’s Register of Risk (Section 7.3).
- 8.5.6 Services should also be mindful where content relating to eating disorders provides safety promoting resources and should ensure that children are able to access resources from genuine support services. Children should be able to access responsible, health promoting information about, and support for, eating disorders.
- 8.5.7 Relatedly, services should carefully consider recovery content when making judgements. Recovery content can provide sources of hope, support, connection, encouragement, and motivation for challenging eating disorder behaviours.<sup>1432</sup> However, there is a broad range of content related to recovery, and services should be aware that even some content which is framed as ‘recovery focused’ can nevertheless be associated with risk of harm to children.<sup>1433</sup> For example,
- a) Some representations of eating disorder recovery may include characteristics which may be harmful for children, for example images of emaciation presented as a ‘before’ and ‘after’ in a recovery context.<sup>1434</sup> This may include content which lists the number of calories consumed, documents specific weights or which provides accounts of eating disorder behaviours which are detailed enough as to provide instructions.<sup>1435</sup>
  - b) Harmful comments may be posted on positive recovery content; harmful content may also be disguised as ‘recovery-focused’ through the use of recovery hashtags, for example.
- 8.5.8 In addition, services should be aware that pro-eating disorder content can develop quickly and evolve rapidly which can enable such content to evade content moderation. Content tagging and codewords can be used by pro-eating disorder communities, often in the form of hashtags or captions. For example, some content may be disguised as focused on “healthy” lifestyles or “pro-fitness”.<sup>1436</sup> Some content may use terms intended to obscure the content (for example, intentional misspelling/leet, algospeak, use of acronyms, use of coded adoption of words originating in popular culture or dieting communities).<sup>1437</sup>
- 8.5.9 Within the context of pro-eating disorder forums, groups and communities, images can be shared to incentivise eating disorders or behaviours associated with eating disorders.

---

<sup>1432</sup> Au ES, Cosh SM, 2022. [Social media and eating disorder recovery: An exploration of Instagram recovery community users and their reasons for engagement](#). [accessed 25 March 2024]

<sup>1433</sup> Ofcom Research, 2024. [Experiences of children encountering online content relating to eating disorders, self-harm and suicide](#) [accessed 25 March 2024]

<sup>1434</sup> Greene, A.K., Norling, H.N., Brownstone, L.M, 2023. [Visions of recovery: a cross-diagnostic examination of eating disorder pro-recovery communities on TikTok](#). [accessed 25 March 2024]

<sup>1435</sup> Beat. [Beat Media Guidelines](#) [accessed 25 March 2024]

<sup>1436</sup> Ofcom, 2024. [Experiences of children encountering online content relating to eating disorders, suicide and self harm](#).

<sup>1437</sup> Centre for Countering Digital Hate, [Deadly by Design](#) [accessed 25 March 2024]

“Thinspiration”, or variations on this term (often using the suffix -spo), are often also used to encourage eating disorder behaviours, or motivate users towards extreme thinness.

- 8.5.10 Services should take care when assessing artistic representations of eating disorders or behaviours, for example, music, poetry, artwork or fictional works. drawings, stories, paintings and other art. These may romanticise or glamourise eating disorders in a way that is harmful to children. We are mindful of the need to consider freedom of expression. However, where content meets the definition of eating disorder content under the Act, then it should be treated as eating disorder content, regardless of the format. Services should therefore focus on whether the content meets the definition under the Act.

## Examples

---

### Examples or kinds of content that Ofcom considers to be eating disorder content that is harmful to children

- 8.5.11 Table 8.5.2 below describes the kinds of eating disorder content that Ofcom considers meets the definition in the Act, along with a non-exhaustive list of examples.
- 8.5.12 We have not addressed the level or impact of harm within the below table. For further information on the impact of eating-disorder content, please see Section 7.3 in this Volume.
- 8.5.13 Services should keep in mind that, in accordance with the Act, the kinds or types of content listed *must* encourage, promote, or provide instructions for eating disorders, but do not need to do so intentionally.
- 8.5.14 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

**Table 8.5.2: Descriptions and examples of content which encourages, promotes or provides instructions for eating disorders or behaviours associated with eating disorders**

Content description	Content examples
<p><b>Content which glamourises eating disorders, including images or videos of emaciation with aspirational commentary, or presented in a way which presents emaciation as aspirational</b></p>	<ul style="list-style-type: none"> <li>• Images shared as motivation to encourage or glamourise extreme thinness (e.g. ‘thinspiration’), such as through using aesthetic filters or commentary presenting emaciation as aspirational.</li> <li>• ‘Bodychecks’ and/or images of extreme thinness romanticising and showing protruding collarbones, hipbones, protruding rib bones or flat or concave stomachs, or ‘thigh gaps’, ‘before and after weight-loss transformations’.</li> <li>• Images or videos presenting extreme weight loss or poses which emphasise dangerously low body weight. These may be accompanied by specific weights, BMI, or measurements.</li> <li>• Artistic content, or artwork which glamourises or romanticises dangerously low body weight, particularly when accompanied by promotional text, sounds or hashtags.</li> <li>• Images accompanied by text-based ‘motivational’ quotes or poetry encouraging eating disorders, or tags or references to known pro-eating disorder hashtags.</li> </ul>
<p><b>Content which includes instructions for carrying out methods or accessories for eating disorders or behaviours associated with eating disorders</b></p>	<ul style="list-style-type: none"> <li>• Content which provides instructions for any methods of extreme calorie restriction, purging, bingeing or increasing energy expenditure.</li> <li>• Instructions for concealing eating disorder behaviours from others (e.g. how to hide purging or bingeing so as to continue to engaging such behaviours).</li> <li>• Instructions for purging methods, or compensatory behaviours. For example, information on types of laxatives, where to buy them, dosage, when to take them and alternatives that may have the same effect.</li> </ul>

Content description	Content examples
<p><b>Content which promotes or encourages eating disorders or behaviours associated with eating disorders, this could include competition or challenges</b></p>	<ul style="list-style-type: none"> <li>• Content which glamourises or frames symptoms of eating disorders as measures of success.</li> <li>• Content which lists specific calorie counts, specific weights, BMI, or measurements within the context of an eating disorder.</li> <li>• Content which uses criticism as an incentive to engage in eating disorder behaviours. For example, users requesting or giving ‘meanspo’ (i.e. ‘mean’ or critical comments to motivate eating disorder behaviours).</li> <li>• Content which incentivises eating disorder behaviours by encouraging disgust or weight stigma towards bodies which are not underweight.</li> <li>• Content which shames, ridicules, or frames some eating disorder behaviours as not ‘extreme enough’.</li> <li>• Challenges related to eating disorders, including challenges which encourage children to fast as a way to lose weight.</li> </ul>
<p><b>Content which encourages interactive behaviours associated with eating disorders, including in pro-eating disorder or recovery spaces</b></p>	<ul style="list-style-type: none"> <li>• Content involving groups, forums, or group messages which promote eating disorder behaviours e.g. requesting or offering to act as an ‘ana-buddy’, ‘pro-ana coach’<sup>1438</sup> or engage in group fasting.</li> <li>• Content encouraging others to share images of emaciation, and/or images of purging.</li> <li>• Sharing or requesting “tips,” “hacks” or “motivation” for behaviours associated with eating disorders, with users listing goal weights, current weights and/or lowest weights (for example in forum signatures or bio information).</li> <li>• Lists of “commandments” for eating disorder lifestyles.</li> </ul>

<sup>1438</sup> The terms ‘ana-buddy’ and ‘pro-ana coach’ are used to describe an individual who encourages or assists a person to maintain behaviours associated with an eating disorder and promotes an anti-recovery mindset.

Content description	Content examples
<p><b>Content which describes behaviours associated with eating disorders in sufficient detail as to provide instructions for eating disorders, including when inadvertent or presented in a recovery context</b></p>	<ul style="list-style-type: none"> <li>• Content including detail about specific amounts of calories or food consumed per day within the context of an eating disorder.</li> <li>• Blogs including detailed accounts of extreme or persistent calorie restriction without countervailing context.</li> <li>• Stories which include details about eating disorder behaviours or instructions which can be emulated, with the lack of countervailing context. For example, detailed description of extreme and/or persistent calorie restriction or extreme fasting (for example including specific weights).</li> </ul>
<p><b>Extreme or excessive dieting, weight loss, nutritional or fitness content</b></p>	<ul style="list-style-type: none"> <li>• Content which provides instructions for weight loss or fitness which is extreme and/or excessive and/or dangerous, for example posts promoting excessive exercise despite injury or fatigue.</li> <li>• Content which provides instructions for excessive dieting or nutrition, such as posts documenting extreme and or persistent calorie restriction, extreme fasting, group fasting or drinking water to curb hunger.</li> <li>• Content which promotes laxative misuse or manipulation of insulin dosage.</li> </ul>

## Examples or kinds of content that Ofcom considers not to be eating disorder content that is harmful to children

- 8.5.15 Table 8.5.3 describes the kinds of eating disorder content that Ofcom does not consider meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.5.16 Ofcom does not expect services to unduly restrict children’s access to genuinely safety-promoting, non-harmful information and resources relating to self-harm. Where content that promotes recovery and awareness of eating disorders and does not contain any of the content listed above in Table 8.5.2 this may not be considered Primary Priority Content.

**Table 8.5.3: Descriptions and examples of content which is not content that encourages, promotes or provides instructions for eating disorders or behaviours associated with eating disorders**

Content description	Content examples
<p><b>Safety promoting resources which provide healthy coping mechanisms or signpost to services for recovery</b></p>	<ul style="list-style-type: none"> <li>• Content which provides support resources and encourages help-seeking (e.g. charity helplines).</li> <li>• Content which promotes the message that recovery from an eating disorder is possible with the right treatment and support.</li> <li>• NHS information pages, NICE Guidelines and other recognised medical resources.</li> </ul>
<p><b>Content focused on research, awareness, advocacy and support related to eating disorder prevention</b></p>	<ul style="list-style-type: none"> <li>• Content from charity or educational sites posted on user-to-user services which could, for example give information about spotting the signs of eating disorders, or signpost where/how to seek help for an eating disorder.</li> </ul>
<p><b>Content which includes descriptions of eating disorders and/or associated behaviours, including recovery content, without sufficient detail to provide instructions, and which do not otherwise encourage or promote</b></p>	<ul style="list-style-type: none"> <li>• Recovery content such as personal accounts of experiences which are not sufficiently detailed as to provide instructions for behaviours associated with eating disorders.</li> <li>• Text based motivational quotes encouraging recovery from an eating disorder.</li> <li>• Lists of reasons to recover from an eating disorder, recovery goals, or distractions.</li> <li>• Artistic works which motivate or describe eating disorder recovery, where they do not promote or encourage eating disorders (e.g. they do not include images of emaciation or content which glamourises eating disorders).</li> </ul>
<p><b>Academic articles or studies that examine eating disorders</b></p>	<ul style="list-style-type: none"> <li>• Eating disorder research which does not provide instructions for behaviours associated with an eating disorder.</li> <li>• Research that does not provide information about where individuals may find instructions for behaviours associated with eating disorders (for example, mentions of forums or chatrooms that contain content which encourages, promotes, or provides instructions for eating disorder behaviours).</li> </ul>
<p><b>Journalistic content that does not promote, encourage, or provide instructions for eating disorders</b></p>	<ul style="list-style-type: none"> <li>• An article focused on the prevalence of eating disorders.</li> </ul>

Content description	Content examples
<p><b>Content involving eating behaviours which are due to religious or other culturally sanctioned practices</b></p>	<ul style="list-style-type: none"> <li>• Content related to religious fasting.</li> <li>• Content related to infrequent overeating or feasting during holidays or occasional celebrations.</li> </ul>
<p><b>Content involving images of people with low body weight which do not glamourise or otherwise promote eating disorders</b></p>	<ul style="list-style-type: none"> <li>• Images of people with low body weight which is unrelated to an eating disorder, for example due to another medical condition.</li> <li>• Content depicting people with low body weight or low BMIs which are not presented in a manner or context which glamourises or promotes eating disorders.</li> </ul>



## 8.6 Guidance on abuse and hate content

**Warning: this section contains references to content that may be upsetting or distressing, including reference to sexual violence**

This chapter provides examples of the content or kinds of content that Ofcom considers to be or considers not to be content which is abusive and content which incites hatred.

- Content which is **abusive**<sup>1439</sup> means that which targets the characteristics of race<sup>1440</sup>, religion<sup>1441</sup>, sex, sexual orientation, disability<sup>1442</sup>, or gender reassignment.<sup>1443 1444</sup>
- Content which **incites hatred**<sup>1445</sup> means that which incites hatred against people of a particular race, religion, sex, or sexual orientation, who have a disability, or who have the characteristic of gender reassignment.

8.6.1 This guidance deals with abusive content and content that incites hatred jointly, as both types of content target listed characteristics and have similarities due to how these harms manifest. Throughout this guidance we refer to the two categories of content collectively as **‘abuse and hate content’**. We refer to the characteristics outlined in the Act as ‘listed characteristics’ for the purposes of this Guidance.

8.6.2 Although treated jointly, there are distinguishing factors between the two types of content. For the purposes of this guidance, we define abusive content as being targeted at the listed characteristics of an individual, whereas content that incites hatred is against a group, or a group of persons holding the same listed characteristic. This could be in the form of direct calls to hate a particular group, or where hateful expressions in themselves could have the effect of inciting others.

### Considerations for services

---

#### Relevant illegal content

8.6.3 Abuse and hate content that is targeted against some of the listed characteristics may be illegal in some circumstances.

---

<sup>1439</sup> Section 62(2) of the Online Safety Act 2023 (‘the Act’).

<sup>1440</sup> Section 62(10)(b) of the Act explains “race” to include colour, nationality, and ethnic or national origin.

<sup>1441</sup> Section 62(10)(c) of the Act explains how references to religion include references to a lack of religion.

<sup>1442</sup> Section 62(10)(a) of the Act explains “disability” to mean any physical or mental impairment.

<sup>1443</sup> Section 62(11) of the Act explains how a person has the characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex.

<sup>1444</sup> Section 62(2) of the Act. We note that these characteristics are similar to certain ‘protected characteristics’ under the Equality Act 2010, which also lists disability, gender reassignment, religion (in that case, including belief), sex and sexual orientation among the protected characteristics. However, the way these terms are defined in the Act is not identical to the definitions used in the Equality Act 2010, as so we do not presume they should have the same meaning for the purposes of this guidance.

<sup>1445</sup> Section 62(3) of the Act.

8.6.4 We have provided comprehensive guidance on how service providers should make illegal content judgements in relation to abuse, harassment and hate content in the ‘Threats, Abuse and Harassment (including Hate)’ section of the draft Illegal Content Judgements Guidance (‘ICJG’)<sup>1446</sup> published as part of our [Illegal Harms Consultation](#). Service providers should refer to this to understand the criteria for illegality in full. Broadly, content may be illegal where there are reasonable grounds to infer that it:

- is abusive *and* is likely to cause a ‘reasonable person’ to suffer ‘fear or alarm’<sup>1447</sup>;
- is abusive *and* is likely to cause someone seeing it harassment or distress<sup>1448</sup>;
- is *likely to* ‘stir up’ racial hatred<sup>1449</sup> <sup>1450</sup>;
- is threatening *and* intentionally ‘stirs up’ hatred on the basis of religion or sexual orientation<sup>1451</sup>.

## Key terms

**Table 8.6.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Abusive</b>	Content that insults, derogates, dehumanises or threatens a person on the basis of a listed characteristic.
<b>Incites hatred</b>	Content that encourages, advocates, or justifies animosity, hostility, rejection or violence against a group of persons on the basis of a listed characteristic.

## Additional context for services

8.6.5 Abuse and hate content is a broad category and may overlap with other categories of content. For example, content which incites hatred against women can draw on themes promoting or encouraging gendered violence. For more information see Violent Content (Section 8.8).

8.6.6 In addition, services should be aware that abuse and hate content can be on the basis of multiple listed characteristics at once. For example, abusive content may target a person on the basis of their race and sex, and this content may use different terms or be leveraged in different contexts than abusive content which targets either race or sex. Services should also note that abuse and hate content can be present regardless of whether the individual or group targeted holds the listed characteristic, or the individual or group is merely perceived to hold the listed characteristic.

8.6.7 Services should consider contextual factors when assessing potential hate and abuse content. Whether content is likely to be abusive or inciting hatred will depend on how the

<sup>1446</sup> Ofcom, 2023, [Illegal Content Judgements Guidance](#)

<sup>1447</sup> This is likely to amount to an offence under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010.

<sup>1448</sup> This is likely to amount to an offence under section 5 of the Public Order Act 1986.

<sup>1449</sup> Racial hatred is hatred against a group of persons defined by reference to colour, race, nationality (including citizenship) or ethnic or national origins.

<sup>1450</sup> This is likely to amount to an offence under section 21 of the Public Order Act 1986.

<sup>1451</sup> This is likely to amount to an offence under section 29B of the Public Order Act 1986. [accessed 25/04/2024]

listed characteristic is presented, the negative stereotypes that exist and the social context. To make an assessment, services should consider the likelihood of abuse being experienced by an individual, or the likelihood of incitement of hate against a group, rather than the intent of the user posting the content. This means services should consider how and where the content is shared, who it is directed at, and how it impacts the users exposed to it.

- 8.6.8 A wide range of actors engage in abusive and hateful behaviour, including both lone individuals and individuals affiliated with hate groups or groups advocating violence and hatred against protected groups with listed characteristics. Some actors may deliberately set up online spaces in order to humiliate or degrade a target, and this may form part of a campaign of mistreatment.
- 8.6.9 In practice, substitute terms for listed characteristics might be used in order to evade content moderation. Such terms can be neutral or have derogatory intentions. For instance, these might appear as hashtags as part of the content. Content might also be posted as a 'one-off' or be repetitive in nature. This could mean that abuse and hate content may overlap with Section 8.7, bullying content, specifically where content is targeted at a listed characteristic.

## Examples

---

### Examples of kinds of content that Ofcom considers to be abuse and hate content that is harmful to children

- 8.6.10 Table 8.6.2 below describes the kinds of content that Ofcom considers meets the definition of the Act, along with a non-exhaustive list of examples. Where listed characteristics are described, this is for illustrative purposes, and is not intended to give undue weight to any one characteristic.
- 8.6.11 We have not addressed the level or impact of harm within the below table. For further information on the impact of abuse and hate content, please see Abuse and hate content in the draft Children's Register of Risk (Section 7.4).
- 8.6.12 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

**Table 8.6.2: Descriptions and examples of content that is abusive and harmful to children**

Content description	Content examples
<p><b>Insulting or intimidating remarks or harmful stereotypes targeted towards an individual</b></p>	<ul style="list-style-type: none"> <li>• A comment that leverages harmful tropes to derogate a person on the basis of their religion and/or race.</li> <li>• A post that uses gendered and/or homophobic slurs to mock or degrade a person.</li> <li>• A comment that intentionally misgenders a person with the intention to humiliate, insult, offend or ‘out’ someone.</li> </ul>
<p><b>Content which objectifies and demeans a person on the basis of their listed characteristic</b></p>	<ul style="list-style-type: none"> <li>• A post that claims an individual is physically or mentally inferior or deficient on the basis of one or more listed characteristic(s).</li> <li>• A derogatory meme or caricature of a person, with threatening, abusive, hurtful or harmful commentary added.</li> </ul>

**Table 8.6.3: Descriptions and examples of content that incites hatred and is harmful to children**

Content Description	Content Examples
<p><b>Repeating harmful and discriminatory ideas about another group in order to encourage others to share such beliefs</b></p>	<ul style="list-style-type: none"> <li>• A comment which justifies or promotes the social exclusion of a group from society that share a listed characteristic.</li> <li>• A post which encourages the dehumanisation of a group sharing a listed characteristic by comparing them to non-humans.</li> </ul>
<p><b>Defending or legitimising threatening action against a group of people</b></p>	<ul style="list-style-type: none"> <li>• A comment that justifies hate against groups with one or more listed characteristics.</li> <li>• A post that condones behaviours or attitudes that dehumanises a group belonging to a listed characteristic.</li> <li>• A video that explicitly suggests that hateful behaviours towards a group sharing a listed characteristic lead to social status, wealth and fame.</li> </ul>

## Examples or kinds of content that Ofcom considers not to be abuse and hate content that is harmful to children

8.6.13 Table 8.6.4 below describes the kinds of abuse and hate content that Ofcom does not consider to meet the definition of Priority Content under the Act, including reference to ‘additional considerations for services’ (above), along with a non-exhaustive list of examples.

8.6.14 The examples of content listed below do not meet the definition of Priority Content, but they may still be inappropriate for children in certain age groups (e.g. younger children).

**Table 8.6.4: Descriptions and examples of content that is not abuse or hate content that is harmful to children**

Content description	Content examples
<b>Educational content and personal accounts of abuse or hatred</b>	<ul style="list-style-type: none"> <li>• An educational history clip where stereotypical tropes are implicitly or explicitly challenged or criticised.</li> <li>• A personal testimony of a victim or survivor of targeted abuse explaining in detail what happened to them.</li> </ul>
<b>Counter-speech</b>	<ul style="list-style-type: none"> <li>• A debate where harmful narratives receive credible and compelling alternative messages to safeguard a user engaging with it.</li> </ul>
<b>Artistic (including satirical) content</b>	<ul style="list-style-type: none"> <li>• A music video that uses reclaimed slurs or tropes.</li> <li>• A poem or image discussing oppression of a group in an attempt to raise awareness about injustice.</li> </ul>
<b>Journalistic content and democratic or political speech</b>	<ul style="list-style-type: none"> <li>• A journalistic account of an incident of hate and abuse (e.g. as recounted or filmed by a witness).</li> <li>• A comment on a post by a political candidate who has a listed characteristic expressing strong disagreement with a policy position, rather than expressing abuse or hatred against their listed characteristic.</li> </ul>

# 8.7 Guidance on bullying content

**Warning: this section contains references to content that may be upsetting or distressing.**

This section provides examples of the content or kinds of content that Ofcom considers to be, or considers not to be, bullying content. Content may, in particular, be bullying content if it is content targeted against a person which (a) conveys a serious threat; (b) is humiliating or degrading; (c) forms part of a campaign of mistreatment.<sup>1452</sup>

## Considerations for services

---

### Relevant illegal content

- 8.7.1 Bullying content may also be illegal in some circumstances. We have provided comprehensive guidance on how services should make illegal content judgements in relation to abuse and harassment content in our Threats, Abuse and Harassment (including Hate) section of the draft Illegal Content Judgements Guidance (“ICJG”)<sup>1453</sup> published as part of our [Illegal Harms Consultation](#). Service providers should refer to this to understand the criteria for illegality in full.
- 8.7.2 Broadly, content may be illegal where there are reasonable grounds to infer that:
- a) a user is engaging in threatening or abusive behaviour where that behaviour is likely to cause a ‘reasonable person’ to suffer either ‘fear or alarm’, or ‘harassment or distress’, for example where individuals send threatening or abusive texts, voice messages, image or comments directly to an individual or make threats to harm someone or their family (see ‘Threats, Abuse and Harassment (including Hate)’ in the ICJG);
  - b) the sharing of child sexual abuse material, including self-generated indecent imagery (see Illegal Content Judgements Guidance chapter on ‘Child Sexual Abuse Material’)
  - c) a threat to disclose an intimate image (see Illegal Content Judgements Guidance chapter on ‘Image-Based Sexual Offences’), noting that the image may constitute child sexual abuse material (see Illegal Content Judgements Guidance chapter on ‘Child Sexual Abuse Material’); and
  - d) the sending of sexual messages to a child (see Illegal Content Judgements Guidance chapter on ‘Grooming’).

---

<sup>1452</sup> Section 62(12) of the Online Safety Act 2023 (‘the Act’).

<sup>1453</sup> Ofcom, 2023, [Illegal Content Judgements Guidance](#)

## Key terms

**Table 8.7.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Serious Threat</b>	To express in earnest an intent to inflict serious harm (for example to inflict physical harm, reputational damage or other hostile actions on someone).
<b>Humiliating</b>	An act that lowers an individual’s dignity or self-respect, embarrasses, or demeans them, or otherwise subjects them to humiliation.
<b>Degrading</b>	An act that lowers an individual’s estimation, debases them, or brings them into disrepute.  Within the context of bullying content, this could include sending, sharing or posting untrue messages or rumours about a victim which may make them feel humiliated or damage their reputation or friendships.
<b>Campaign of Mistreatment</b>	Repeated, persistent and intentional ill-treatment of an individual or a group.
<b>Bullying</b>	Bullying encompasses behaviour that has most or all, of the following traits: <ul style="list-style-type: none"> <li>• Persistent or repetitive</li> <li>• Intended to hurt someone (physically, verbally, and/or psychologically)</li> <li>• Involves a perceived power imbalance (including, for example, imbalances in physicality and/or perceived social status).</li> </ul> <p>Bullying can occur in-person or online, or both. Where it occurs online, it is often referred to as ‘Cyberbullying’.</p>

## Additional context for services

8.7.3 As a harm, bullying is varied, subjective and highly contextual. Bullying can involve repeated or persistent behaviour which is intended to hurt a single person or multiple people. Impacts are generally cumulative. Refer to Bullying Content section of the Children’s Register of Risk in this volume for more detail (Section 7.5). This section provides guidance of identifying content that indicates bullying behaviours. For this kind of harmful content in particular, contextual factors are particularly important when making judgements about whether content should be considered bullying content. In seeking to assess potential bullying content, services should consider reasonably available information in determining whether content constitutes bullying content. This may include information provided by a user as part of a complaint or through a service’s reporting process.



- 8.7.4 Services should consider whether individual pieces of content should be viewed in the context of a wider campaign of mistreatment. For example, if a child is being repeatedly targeted by bullying content or targeted by several other users, this may indicate that the hurtful content shared should be considered bullying content.
- 8.7.5 Services should also consider how to distinguish between bullying and behaviour that some may describe as ‘jokes’ or ‘banter’ between friends. For example, if the child being targeted is engaging or responding in a light-hearted way, or has otherwise positive interactions with the user, this may indicate that the content should not be considered bullying content.
- 8.7.6 Bullying content can often be aimed at individuals from certain groups, for example because of race, religion, gender or sexual orientation. Bullying content may therefore overlap with other categories, for example, abuse and hate (see Section 8.6). Bullying content may also overlap with content which encourages self-harm or suicide (Sections 8.3 and 8.4) or violent content (Section 8.8). We recommend that services take these sections into account when considering content which is initially indicated to be ‘bullying content’.
- 8.7.7 This guidance is limited to bullying content. Some bullying behaviours do not involve content, such as children being removed or excluded from group chats as part of a bullying campaign. We therefore do not provide examples relating to exclusionary behaviour in this guidance. These behaviours are nevertheless important to consider in understanding the risk of harm from bullying online. Evidence relating to exclusionary behaviours is therefore included Register of Risk (see Section 7.5 of this volume).
- 8.7.8 Due to the nature of bullying outlined above, some of the examples in this section are less specific than other sections in this Guidance. This reflects the fact it is particularly important for services of consider contextual factors in identifying bullying content.

## Examples

---

### Examples and kinds of content that Ofcom considers to be bullying content that is harmful to children

- 8.7.9 Table 8.7.2 below describes the kinds of bullying content that Ofcom considers meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.7.10 We have not addressed the level or impact of harm within the table. For further information on the risks and impact of bullying content, please see ‘Bullying content’ section of the Children’s Register of Risk (Section 7.5).
- 8.7.11 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

**Table 8.7.2: Descriptions and examples of content that is bullying content that is harmful to children**

Content Description	Content Examples
<p><b>Content that persistently or repetitively targets individuals with offensive or otherwise harmful content – <i>may include targeting people based on certain characteristics, see also Abuse and Hate content (Section 8.6).</i></b></p>	<ul style="list-style-type: none"> <li>• Persistent or repetitive offensive name calling. Name calling can include words which are overtly offensive. Commonly used words can also take an offensive meaning; for example, if related to a nickname that has been given to someone with the purpose of humiliating them.</li> <li>• Persistently or repetitively sending messages, comments or posts to or about an individual likely to cause harm, including content which humiliates, insults, intimidates, teases, offends or otherwise hurts someone (for example comments about someone’s attributes or personal circumstances, physical appearance, body type, personality, family, behaviours or actions).</li> </ul>
<p><b>Content that persistently or repetitively targets groups with offensive or otherwise harmful content - <i>may include targeting groups based on certain characteristics, see also Abuse and Hate content (Section 8.6)</i></b></p>	<ul style="list-style-type: none"> <li>• Persistently or repetitively sending messages, comments or posts which are intended to humiliate, insult, intimidate, tease, offend or otherwise hurt a group of people.</li> <li>• Examples include, targeting a group because of their interests or hobbies, including likes or preferences which are seen to be immature; targeting a group of children for being studious at school; or targeting a group because they are perceived not to belong to the group that the individual or group that is targeting them belongs to.</li> </ul>

Content Description	Content Examples
<p><b>Content depicting or relating to a specific individual in an offensive or otherwise harmful way, shared without their consent in order to humiliate</b></p>	<ul style="list-style-type: none"> <li>• Circulating images or videos, such as unflattering photos or video screengrabs, without the consent of the person in the image or video and with the purpose of humiliating them, for example a video of someone falling over accompanied with humiliating commentary. This could include content created via use of content editing tools, including content created by GenAI.</li> <li>• Manipulated images which are derogatory to an individual (e.g. superimposing an image of a child into a context intended to be offensive).</li> <li>• Circulating recordings of an individual without their consent as a means of humiliation, for example personal voice notes, or recordings of someone showing distress.</li> <li>• Sharing personal details or private information without permission, to humiliate, or as part of a campaign of mistreatment (i.e. doxxing).</li> <li>• A video, image or voice note, or audio of someone being bullied. For example, a video recording of someone being subjected to name calling, or physical bullying such as hitting slapping or pushing, in order to humiliate them. [Note, some of this may also constitute violent content, see Section 8.8]</li> </ul>
<p><b>Content contributing to a ‘pile-on’ or other text-based humiliation in online public spaces</b></p>	<ul style="list-style-type: none"> <li>• A number of comments on content or posts which exacerbate or intensify the humiliation or degradation of an individual. This could also include text posts maliciously sharing private information about an individual.</li> </ul>
<p><b>Serious threats or aggressive behaviours</b></p>	<ul style="list-style-type: none"> <li>• One-off or knee jerk comments telling someone to harm themselves that do not amount to encouraging self-harm, e.g. ‘go jump off a bridge’</li> <li>• Serious threats to release private/intimate information (i.e. doxxing)</li> </ul>

## Examples or kinds of content that Ofcom considers not to be bullying content that is harmful to children

- 8.7.12 The table below describes the kinds of bullying content that Ofcom does not consider meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.7.13 Services should keep in mind that, in accordance with the Act, the kinds or types of content listed must not constitute bullying content. Some examples would only apply in certain limited circumstances and would be context-specific, so services should rely on

reasonably available information, including user complaints, in making content judgements.

**Table 8.6.3: Descriptions and examples of content that is not bullying content that is harmful to children**

Content description	Content examples
<p><b>Content that is not malicious, which does not humiliate or degrade and does not form part of a campaign of mistreatment, even if it may be capable of causing some offence to an individual</b></p>	<ul style="list-style-type: none"> <li>• For example, a clip from a stand-up comedy sketch which includes satirical or parodical jokes which are not malicious (i.e. not humiliating or degrading an individual or group, and not part of a wider campaign of mistreatment towards an individual or group).</li> </ul>
<p><b>Content which raises awareness of bullying</b></p>	<ul style="list-style-type: none"> <li>• Educational or journalistic content, for example a video or documentary clip which features real or acted bullying for the purposes of raising awareness of bullying or criticising bullying behaviours.</li> <li>• A post from a charity signposting to support.</li> </ul>
<p><b>Depictions or descriptions of bullying in dramatic contexts</b></p>	<ul style="list-style-type: none"> <li>• Clips from age-appropriate TV or film depicting or describing bullying.</li> </ul>

## 8.8 Guidance on violent content

**Warning: this chapter contains content that may be upsetting or distressing, including detailed discussion of violent content.**

This section provides examples of the content or kinds of content that Ofcom considers to be or considers not to be violent content. Violent content means content which encourages, promotes or provides instructions for an act of serious violence against a person<sup>1454</sup>, or content which depicts real or realistic serious violence against, or detailed, graphic injury of, a person<sup>1455</sup>, animal or fictional creature.<sup>1456</sup>

### Considerations for services

---

#### Relevant illegal content

- 8.8.1 Violent content is a broad category that encompasses many types of content, some of which may be illegal in some circumstances.
- 8.8.2 We have provided comprehensive guidance on how services should make illegal violent content judgements in relation to various kinds of illegal harm in the draft Illegal Content Judgements Guidance ('ICJG')<sup>1457</sup> published as part of our [Illegal Harms Consultation](#). Service providers should refer to this to understand the criteria for illegality in full.
- 8.8.3 Broadly, content may be illegal where it:
- d) Involves depictions of sexual violence involving an adult (see 'Image-based adult sexual offences' in the ICJG);
  - e) Calls on others to commit violence on the basis of race, religion or sexual orientation (see sub-section 'Threats which are likely to stir up racial hatred': Threats, abuse and harassment (including hate) in the ICJG);
  - f) Calls on others to commit violence for the purposes of what may be terrorism, or on behalf of a proscribed group (see 'Terrorism' in the ICJG);
  - g) Involves insulting or abusive words or behaviour, or threatening words, signs or other visible representations and intends to provoke the immediate use of violence by any person, or to make someone think that such violence may be provoked (see sub-section 'Abuse or insults which may provoke violence': Threats, abuse and harassment (including hate) in the ICJG; and/or
  - h) Concerns the sale of a firearm, knife or weapon (see 'Firearms and other weapons' in the ICJG).
- 8.8.4 Any content which depicts children aged under 18 engaged in, or appeared to be engaged in, sexual activity is child sexual abuse material ('CSAM'), which is illegal content (see 'Child Sexual Abuse Material' in the ICJG).

---

<sup>1454</sup> Section 62(4) of the Online Safety Act 2023 ('the Act').

<sup>1455</sup> Section 62(6) of the Act

<sup>1456</sup> Section 62(7) of the Act

<sup>1457</sup> Ofcom, 2023. [Illegal Content Judgements Guidance](#).

8.8.5 Online content that encourages or assists someone to commit animal cruelty, or conspires to commit this behaviour, may be illegal. Our consultation on animal cruelty offences will follow this consultation. We will review the wording of this draft guidance in the light of that consultation.

## Key terms

**Table 8.8.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Encourages</b>	Content which may persuade others to engage in serious violence and/or makes others more likely to engage in an act of serious violence.
<b>Promotes</b>	Content which recommends, endorses, or portrays violence as positive.  This can include content which glamourises, romanticises, or glorifies serious violence.
<b>Provides instructions for</b>	Content which details methods or guidance specifically related to an act of serious violence, regardless of whether the content was intended to encourage such instructions to be followed or not.
<b>Serious violence or injury</b>	That for which the risk is not slight or negligible. It may be likely to cause significant, lasting or permanent physical and/or mental harm to others.
<b>Realistic violence</b>	A depiction of serious violence or injury that is accurate or true to life.  This includes accurate or true to life computer-generated imagery or content created by generative artificial intelligence (GenAI).

## Additional context for services

8.8.6 Violent content is a broad category and may overlap with other kinds of PC or PPC. For example, content encouraging violence against women and girls, may overlap with abuse and hate content (see Section 8.6) on the basis of sex, sexual orientation, and gender reassignment.

8.8.7 Some forms of violent content, in particular content which encourages or promotes violence, may be more difficult for services to identify. For example, understanding the degree to which the content encourages or promotes violence can be reliant on an understanding of local events, social dynamics or identities. Services should be mindful of context when assessing whether content encourages or promotes violence.

8.8.8 Depictions of violence can also be present in journalistic content or content of democratic importance, for example citizen journalism or advocacy during war. It is important that

children are given the opportunity to access this content where it is appropriately contextualised, especially if violence is blurred or shot from a distance. However, where violence is graphic and depicts serious injuries it may be harmful to children, even if the content is journalistic or of democratic importance.

- 8.8.9 Most children play games online, some of which can incorporate violence. In assessing whether violent content related to gaming poses a risk of harm to children, services should consider whether the violence depicted meets the definitions above. Namely, whether the content depicts realistic serious violence or realistic serious injury in graphic detail. In making this assessment, games industry age ratings are useful guidance to understand what is appropriate for children across various ages. Violent content related to gaming may include game play being livestreamed or clips of it being posted online.

## Examples

---

### Examples or kinds of content that Ofcom considers to be violent content that is harmful to children

- 8.8.10 The tables below describes the kinds of violent content that is harmful to children that Ofcom considers meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.8.11 We have not addressed the level or impact of harm within the below table. For further information on the impact of harm, please see the draft Children’s Register of Risks (Section 7.6) in this volume.
- 8.8.12 We have separated out the three types of violent content into tables under the relevant subheadings as follows:
- a) Content which encourages, promotes or provides instructions for an act of serious violence against a person (Table 8.8.2);
  - b) Content which depicts real or realistic serious violence against a person, or the serious injury of a person in graphic detail (Table 8.8.3); and
  - c) Content depicting real or realistic serious violence against an animal or fictional creature, or the serious injury of an animal or fictional creature in graphic detail (Table 8.8.4).
- 8.8.13 Many kinds of content will only meet the definition under the Act in certain circumstances, which we illustrate with examples below. It should not be read that all content under the ‘content description’ column is violent content.
- 8.8.14 Many kinds of content will only meet the definition under the Act in certain circumstances, which we illustrate with examples below.



**Table 8.8.2: Description and examples of content that encourages, promotes or provides instructions for an act of serious violence against a person**

Content description	Content examples
<p><b>Serious violent threats made against individuals or groups where threats are not based on race, religion or sexual orientation.</b></p>	<ul style="list-style-type: none"> <li>• A video of an individual threatening to attack or ‘beat up’ another individual.</li> <li>• A video featuring an individual threatening to use a weapon on another person.</li> </ul>
<p><b>Content that promotes or glamourises the carrying of weapons</b></p>	<ul style="list-style-type: none"> <li>• A realistic image or video of individuals or groups posing with or brandishing weapons such as lock-backs (flick blades), ‘Rambo’ knives, axes, guns, clubs, screwdrivers and machetes, and which depicts the possession or use of such weapons in a positive light.</li> </ul>
<p><b>Content which glorifies, promotes or glamourises violence</b></p>	<ul style="list-style-type: none"> <li>• A post which justifies or defends the use of sexual violence.</li> <li>• A video which commends domestic abuse as a means to ‘control’ women.</li> <li>• An image which idolises perpetrators of past instances of violence, for example a post depicting a murderer as saint-like.</li> <li>• A video that condones violence against particular groups or individuals, or otherwise explicitly suggests that such violent behaviours or attitudes are associated with an aspirational lifestyle, with fame and/or wealth.</li> </ul>
<p><b>Content which trivialises or misrepresents violent acts, where the purpose is to normalise or discount the impact of violent behaviour</b></p>	<ul style="list-style-type: none"> <li>• A post which argues that victims and survivors of sexual assault must bear some responsibility.</li> <li>• A video which mocks a public figure who has experienced a serious act of violence to discredit or degrade them.</li> </ul>
<p><b>Content that encourages a serious act of violence</b></p>	<ul style="list-style-type: none"> <li>• A video depicting an individual being taunted or goaded into a fight.</li> <li>• A music video that uses incendiary, boastful or taunting lyrics about an incident such as the injury of another individual to encourage violence.</li> <li>• A clip of a video that uses lyrics and/or visuals to depict, revel in or recreate an incident such as the injury or killing of an individual to goad others.</li> </ul>

**Table 8.8.3: Description and examples of content that depicts real or realistic serious violence against a person, or the serious injury of a person in graphic detail**

Content description	Content examples
<p><b>Content depicting physical fights between groups or individuals, with or without the use of weapons</b></p>	<ul style="list-style-type: none"> <li>• An individual being stamped on or punched/kicked repeatedly.</li> <li>• An individual being forcefully hit in the head during a fight.</li> <li>• An individual being ‘slashed’ with a knife during a fight.</li> </ul>
<p><b>Content depicting multiple people beating up an individual</b></p>	<ul style="list-style-type: none"> <li>• Videos depicting a group of people beating up an individual in graphic detail.</li> <li>• Videos depicting an individual being beaten up by a group as a form of retaliation or punishment</li> </ul>
<p><b>Content depicting individuals being subjected to threats, intimidation, or degradation</b></p>	<ul style="list-style-type: none"> <li>• A video of a group breaking into a house and forcing the inhabitants to perform humiliating acts under duress.</li> <li>• A video of an individual being threatened or physically hurt while being made to beg and apologise.</li> </ul>
<p><b>Content depicting serious injury of a person in graphic detail, and often including blood and gore</b></p>	<ul style="list-style-type: none"> <li>• Images of a serious stab wound.</li> <li>• A video of the aftermath of a fight where an individual has been stabbed or otherwise seriously hurt, where cuts and damage to the skin and tissue are visible.</li> <li>• Videos or images of the aftermath of a car accident where an individual’s serious injuries are visible, such as a lot of visible blood, deep cuts or body mutilation.</li> </ul>
<p><b>Content depicting serious violence and/or injury of a person in the context of war and other conflicts.</b></p>	<ul style="list-style-type: none"> <li>• Depictions of serious violence and injury in graphic detail without adequate contextualisation.</li> <li>• Detailed images of the cracked skulls of individuals.</li> <li>• Videos or images of the aftermath of a bomb explosion or violent attack where the impact on human bodies is visible in graphic detail.</li> </ul>

Content description	Content examples
Gaming content depicting serious violence or injury against a realistic human character	<ul style="list-style-type: none"> <li>• A livestream of a videogame where a detailed, realistic CGI human character is beheaded in graphic detail from a game rated 18+.</li> <li>• A clip of a video game posted online where a detailed, realistic CGI human character is exploded.</li> </ul>

**Table 8.8.4: Depicts real or realistic violence against an animal/fictional creature, or the serious injury of an animal/fictional creature in graphic detail**

Content description	Content examples
Content depicting an act of physical violence towards an animal	<ul style="list-style-type: none"> <li>• A video of an animal being beaten.</li> <li>• A video depicting the torture of an animal.</li> </ul>
Content depicting activities that involve the injury or death of animals including animal hunts organised by humans and staged fights	<ul style="list-style-type: none"> <li>• A video of an organised hunt where animals are used to attack or kill other animals.</li> <li>• Videos or images showing organised animal fights.</li> </ul>
Content depicting the serious injury of an animal which is not appropriately contextualised as a natural occurrence. The injury is in graphic detail, and/or includes blood and gore	<ul style="list-style-type: none"> <li>• Videos or images depicting the graphic or detailed aftermath of an animal hunt.</li> <li>• Videos or images depicting the graphic or detailed aftermath of an animal fight.</li> </ul>
Content depicting accidental, negligent or abusive acts that have resulted in the serious injury of an animal without appropriate context (e.g. which might 'normalise' suffering)	<ul style="list-style-type: none"> <li>• Videos or images depicting an animal suffering from extreme starvation.</li> <li>• Videos or images depicting an animal suffering from living in extremely neglectful conditions.</li> </ul>
Gaming content depicting serious realistic violence or injury against an animal or fictional creature	<ul style="list-style-type: none"> <li>• A video of a clip/section of a game rated 18+ where a detailed, realistic CGI animal is ripped apart.</li> <li>• A livestream of a game rated 18+ where a detailed, realistic CGI fictional creature is decapitated.</li> <li>• A video of a clip/section of a game rated 18+ where a detailed, realistic CGI animal is exploded.</li> </ul>

## Examples and kind of content that Ofcom considers not to be violent content that is harmful to children

- 8.8.15 The tables below describe the kind of content that Ofcom does not consider meet the definition under the Act, along with a non-exhaustive list of examples.
- 8.8.16 The examples of content listed below do not meet the definition of Priority Content, but they may still be inappropriate for children of certain age groups.
- 8.8.17 As above, we have separated out the three types of violent content into tables under the relevant subheadings as follows:
- Content which does not encourage, promote or provide instructions for an act of serious violence a person (Table 8.8.5):
  - Content which does not depict real or realistic serious violence against a person, or the serious injury of a person in graphic detail (Table 8.8.6); and
  - Content which does not depict real or realistic serious violence against an animal or fictional creature, or the serious injury of an animal or fictional creature in graphic detail (Table 8.8.7).

**Table 8.8.5: Content which does not encourage, promote or provide instructions for an act of serious violence against a person**

Content description	Content examples
<b>Content that depicts or references violence but does not actively encourage it</b>	<ul style="list-style-type: none"> <li>A music video with lyrics or visuals referencing knife crime without glamourising it.</li> <li>A video depicting people with weapons without encouragement or promotion of those weapons.</li> </ul>
<b>Journalistic, political or educational content</b>	<ul style="list-style-type: none"> <li>A journalistic video discussing youth violence.</li> <li>A post about an academic study about youth violence.</li> <li>A post about the perceived failure of politicians or the police to tackle violence or intervene in a war, which gives (non-graphic) examples of real life violence as context.</li> <li>A testimony of a victim or survivor of violence explaining their experience.</li> </ul>

**Table 8.8.6: Description and examples of content which does not depict real or realistic serious violence against a person, or the serious injury of a person in graphic detail**

Content description	Content examples
<p><b>Content depicting violence that is clearly intended for humour or entertainment</b></p>	<ul style="list-style-type: none"> <li>• A video depicting slapstick violence where the tone is exaggerated, cheerful or light-hearted.</li> <li>• A video of an individual hitting another who falls down without sustaining serious injury.</li> <li>• A video of a comedic knock to the head that lacks force and does not cause serious injury.</li> <li>• A video featuring playful physical contact, e.g. someone tackling another individual without force.</li> <li>• An image depicting a fictional character carrying a weapon, for example a cartoon, fantasy or fictional character with a sword or axe.</li> </ul>
<p><b>Content depicting physical fights that would not likely meet the threshold for serious violence</b></p>	<ul style="list-style-type: none"> <li>• A video of a fight where individuals are pushing and shoving each other.</li> <li>• A clip from an age-appropriate film showing a fictional fight.</li> </ul>
<p><b>Content depicting superficial injuries where no lasting physical harm is shown or implied</b></p>	<ul style="list-style-type: none"> <li>• Images depicting scratches, bruises or cuts from the aftermath of a fight.</li> </ul>
<p><b>Journalistic content or content with an educational purpose</b></p>	<ul style="list-style-type: none"> <li>• Videos of individuals or groups in wartime conflict zones suffering from serious injuries as part of a journalistic article.</li> <li>• Videos or images of individuals or groups suffering from serious injuries due to a natural disaster or effect of the climate crisis as part of a journalistic article.</li> <li>• Videos or images from a warzone where violence is not shown in graphic detail, e.g. it is blurred or captured from a distance.</li> <li>• Historical depictions of violence or weaponry, where violence is not shown in graphic detail, e.g. battle re-enactments.</li> </ul>
<p><b>Content depicting professional or licensed sports</b></p>	<ul style="list-style-type: none"> <li>• A video of professional boxing, wrestling or martial arts.</li> <li>• A video of rugby tackling.</li> </ul>

Content description	Content examples
Gaming content depicting trivial violence/injury against a realistic human character	<ul style="list-style-type: none"> <li>A livestream of an age-appropriate videogame where a detailed, realistic CGI human character is punched.</li> </ul>

**Table 8.8.7: Descriptions and examples of content which does not depict real or realistic serious violence against an animal or fictional creature, or the serious injury of an animal or fictional creature in graphic detail**

Content description	Content examples
Cartoon content depicting violence that is clearly intended for humour or entertainment	<ul style="list-style-type: none"> <li>A meme of a cartoon animal being eaten by another animal.</li> <li>A video clip of a cartoon animal dying or being killed.</li> <li>Content that incorporates clips from age-appropriate TV/film entertainment, e.g. popular cartoons with animal characters.</li> </ul>
Content that is journalistic or has educational purposes or justification	<ul style="list-style-type: none"> <li>A journalistic video discussing animal cruelty.</li> <li>A video clip from a nature documentary showing an animal predator hunting prey.</li> </ul>
Charitable or animal welfare content	<ul style="list-style-type: none"> <li>A video of an animal in poor living conditions, appealing for further information (such as about how the animal came to be living in such conditions).</li> <li>Images of animals in poor living conditions being used to fundraise.</li> <li>A video of animals in poor living conditions as part of an animal cruelty awareness raising campaign.</li> </ul>
Gaming content depicting trivial violence/injury against a realistic animal or fictional creature	<ul style="list-style-type: none"> <li>A clip from an age-appropriate game posted online that depicts a fictional creature being playfully hit on the head.</li> </ul>

## 8.9 Guidance on harmful substances content

**Warning: this section contains references to content that may be upsetting or distressing.**

This chapter provides examples of the content or kinds of content that Ofcom considers to be or considers not to be **harmful substance content**. ‘Harmful substance content’ means content which encourages a person to ingest, inject, inhale or in any other way self-administer (i) a physically harmful substance, or (ii) a substance in such a quantity as to be physically harmful.<sup>1458</sup>

### Considerations for services

---

#### Relevant illegal content

- 8.9.1 Encouraging or providing the means for a person to ingest, inject, inhale, or self-administer a physically harmful substance may be illegal in some circumstances.
- 8.9.2 We have provided comprehensive guidance on how services should make illegal content judgements in the draft Illegal Content Judgements Guidance (“ICJG”)<sup>1459</sup> published as part of our [Illegal Harms Consultation](#). services should refer to this to understand the criteria for illegality in full. Broadly, content may be illegal where there are reasonable grounds to infer that it:
- a) amounts to an offer to supply a ‘controlled drug’ or ‘psychoactive substance’, for example because it advertises either substance for sale (see ‘Sale of Drugs’ in the ICJG); or
  - b) intentionally assists or encourages an act of suicide through the administration or consumption of a physically harmful substance (see ‘Assisting or Encouraging Suicide’ in the ICJG); or
  - c) intentionally assists or encourages an act of serious self-harm (that is self-harm which would result in grievous bodily injury, including psychiatric injury) through the administration or consumption of a physically harmful substance once or repeatedly (see assisting or encouraging serious self-harm offence in the ICJG section on ‘Non-priority Offences’).

---

<sup>1458</sup> Section 62(9) of the Act.

<sup>1459</sup> Ofcom, 2023, [Illegal Content Judgements Guidance](#)



## Key terms

**Table 8.9.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Harmful substances</b>	<p>Substances that would cause physical harm to a person if ingested, injected, inhaled or otherwise self-administered (regardless of whether or not it is legal to sell or buy the substance in the circumstances in question). This can include substances that may cause physical harm to a person if ingested, injected, inhaled or self-administered in any other way as a result of consuming it in excessive quantities, or in ways which contravene legal or medical protocols for its safe consumption.</p> <p>We consider physically harmful substances, or substances that may be harmful when used to excess, to include:</p> <ul style="list-style-type: none"> <li>• illegal drugs or psychoactive substances</li> <li>• Alcohol, e-cigarettes or tobacco products (which it is not legal to sell to children in the UK due to the fact they could cause them harm).</li> <li>• Unregulated medicines, consuming prescription medicines without a prescription, and non-prescription medicines in excess</li> <li>• Medical or cosmetic substances or treatments administered contrary to regulation</li> <li>• Substances not intended for human consumption</li> </ul>
<b>Encourages</b>	<p>An act which recommends, advises, incites, induces or instigates children to ingest, inject, inhale or in any way self-administer a physical harmful substance or a substance in such a quantity as to be harmful. For harmful substances specifically, we consider ‘encourage’ to be mean active or express encouragement.</p>

## Additional context for services

- 8.9.3 Services should be mindful that there may be overlap with other categories of harmful content, such as ingestion challenges that encourage individuals to ingest harmful substances. For more information see Sections 8.10 (Guidance on dangerous stunts and challenges content’). There may also be an overlap with suicide or self-harm content (see Section 8.4 and 8.5).

- 8.9.4 Harmful substance content can be identified by specific features. We consider harmful substance content to actively or expressly encourage use of a particular substance. This is likely to include a recommendation or call to action. Content that depicts or describes the use of a harmful substances, without actively or expressly encouraging use, is unlikely to be in scope of the definition. For example, content may depict people using harmful substances in educational or dramatic contexts, in which there is no active or express encouragement of use of that substance. However, examples of content depicting substance use that do not meet the definition of harmful substance content set out in the Act may still be inappropriate for children in certain age groups. The BBFC provides additional guidance for contexts in which depictions and descriptions of substance use may be unsuitable for children in different age groups.<sup>1460</sup>
- 8.9.5 While advertising which promotes harmful substances such as alcohol and tobacco-products may increase the risk of children using those substances, it must meet the definition of user-generated content, or search content, under the Act. For example, where a user is remunerated for advertising alcohol or tobacco, such as sponsored content shared by influencers, it would amount to user-generated content, and therefore may be considered harmful substance content.
- 8.9.6 For some harmful substances, there is limited evidence of examples that actively or expressly encourage use beyond paid-for advertising. Tobacco products are an example of this. We therefore have not included examples relating to tobacco products. However, as part of this consultation, we invite examples from stakeholders of content that actively or expressly encourages use of tobacco products. We advise services that should they identify any such examples, these would likely be considered harmful substances content.

## Examples

---

### Examples and kinds of content that Ofcom considers to be harmful substances that are harmful to children

- 8.9.7 Table 8.9.2 below describes the kinds of harmful substances content that Ofcom considers meets the definition under the Act, along with a non-exhaustive list of examples.
- 8.9.8 We have not addressed the level or impact of harm within the below table. For further information on the impact of harmful substances content, please see Section 7.7.
- 8.9.9 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

---

<sup>1460</sup> 'Drugs' in [BBFC Classification Guidelines](#) [accessed 25 April 2024].

**Table 8.9.2: Descriptions and examples of harmful substances content that is harmful to children**

Content description	Content examples
<p><b>Content encouraging consumption of illegal drugs and psychoactive substances</b></p>	<ul style="list-style-type: none"> <li>• Depictions or personal accounts of users’ ingesting a drug or psychoactive substance with a call to action for others to try it.</li> <li>• Livestreams of a person using a substance, highlighting positive experiences such as the ‘high’ after consumption.</li> </ul>
<p><b>Content encouraging consumption of: unregulated medicines, prescription medicines without a prescription, and non-prescription medicines in excess. This often includes instructing the use of a harmful substance to achieve a certain outcome.</b></p>	<ul style="list-style-type: none"> <li>• Content promoting the abuse of prescription medication, e.g. encouraging use of Xanax for recreational use; or Adderall as a ‘study drug’; or in quantities in excess of recommended dose.</li> <li>• Content which encourages taking quantities of non-prescription medication (e.g. paracetamol, ibuprofen) in excess of the recommended dose.</li> <li>• Content encouraging the abuse of steroids or steroid-like drugs, including videos with first-hand accounts of the use of these harmful substances which present this behaviour in a positive light or advocate others’ use as part of a fitness regime.</li> <li>• Content encouraging self-administered abortion methods or abortion ‘reversal’ remedies that involve ingesting, injecting, inhaling or in any other way self-administering a harmful substance.<sup>1461</sup></li> </ul>
<p><b>Content encouraging excessive consumption of alcohol, or consumption of other age-restricted substances</b></p>	<ul style="list-style-type: none"> <li>• Content encouraging activities that involve drinking excessive amounts, often to the point of vomiting or passing out, e.g. encouraging initiations or hazing rituals or other challenges involving excessive consumption of alcohol.</li> <li>• Content encouraging use of e-cigarettes, e.g. a sponsored post by an influencer promoting an e-cigarette brand or product.</li> </ul>
<p><b>Content encouraging consumption of harmful substances not intended for human consumption</b></p>	<ul style="list-style-type: none"> <li>• Content encouraging the consumption of household cleaning materials as a medical cure, such as disinfectant to kill the COVID-19 virus.</li> </ul>
<p><b>Content encouraging use of cosmetic treatments which can present risk of harm if not administered by qualified professionals</b></p>	<ul style="list-style-type: none"> <li>• Content encouraging or providing instructions for self-administration of Botox injections or lip filler that is contrary to regulation of those substances.</li> </ul>

<sup>1461</sup> This example may be illegal, amounting to encouraging serious self-harm. For further information, refer to the Online Safety Guidance on Judgement for Illegal Content in our [Illegal Harms Consultation](#) (see Encouraging or assisting suicide or serious self-harm section).

Content description	Content examples
Content encouraging challenges or stunts that involve consumption of harmful substances – <i>see also Guidance on dangerous stunts and challenges content (Section 8.10)</i>	<ul style="list-style-type: none"> <li>Ingestion challenges which might involve harmful substances, or substances in quantities that are physically harmful, for example, cleaning products or non-prescription medication.</li> </ul>

## Examples and kinds of content that Ofcom does not consider to be harmful substances content that is harmful to children

- 8.9.10 Table 8.9.3 below describes the kinds of harmful substance content that Ofcom does not consider meets the definition of Priority Content under the Act, along with a non-exhaustive list of examples.
- 8.9.11 The examples of content listed below do not meet the definition of Priority Content, but they may still be inappropriate for children of certain age groups.

**Table 8.9.3: Descriptions and examples of content that is not harmful substances content that is harmful to children**

Content description	Content examples
Journalistic content describing, depicting or referencing the use of harmful substances	<ul style="list-style-type: none"> <li>Journalistic content debunking or exposing false claims around medical treatments involving harmful substances, e.g. the efficacy of drinking disinfectant as a cure for COVID-19.</li> <li>Journalistic content discussing ‘viral’ ingestion challenges and the risks associated with them.</li> <li>Journalistic content on campaigns to legalise certain substances (e.g. reporting on a campaign to legalise the consumption of cannabis in the UK).</li> </ul>
Content which depicts use of substances for dramatic purposes, taking context and age-appropriateness into consideration	<ul style="list-style-type: none"> <li>Clips from age-appropriate films or TV shows which depict use of harmful substances.<sup>1462</sup></li> <li>Content depicting or describing individuals drinking alcohol, smoking tobacco-based products or using e-cigarettes, without active or express encouragement of others to do the same.</li> </ul>
Appropriate medical advice from reputable or accredited resources	<ul style="list-style-type: none"> <li>Appropriate medical advice from official sources (e.g. NHS social media campaigns on drugs, alcohol, cigarettes or other harmful substances).</li> </ul>

<sup>1462</sup> Examples of content depicting substance use that do not meet the definition of harmful substance content may still be inappropriate for children in certain age groups. ‘Drugs’ in [BBFC Classification Guidelines](#) [accessed 25 April 2024].

Content description	Content examples
<p><b>Content describing or depicting the use of harmful substances for purpose of education or information.</b></p>	<ul style="list-style-type: none"> <li>• Content describing or explaining the mental or physical effects of a harmful substance, for example on websites supporting those or providing information to those struggling with substance use.</li> <li>• Content explaining how harmful substances can be administered – for the purpose of educating children on recognising harmful substances or understanding the risks.</li> </ul>

# 8.10 Guidance on dangerous stunts and challenges content

**Warning: this section contains references to content that may be upsetting or distressing.**

This section provides examples of the content or kinds of content that Ofcom considers to be or considers not to be dangerous stunts and challenges content. Dangerous stunts and challenges content means content which encourages, promotes or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it or to someone else.<sup>1463</sup>

## Considerations for services

### Relevant illegal content

- 8.10.1 Content depicting dangerous stunts and challenges may be illegal in some circumstances. Broadly, content should be considered illegal where there are reasonable grounds to infer that it amounts to an offence of intentionally encouraging or assisting an act serious self-harm (that is, self-harm which would result in grievous bodily harm).
- 8.10.2 We have provided comprehensive guidance on how services should make illegal content judgements in the 'Encouraging or assisting serious self-harm' section of the draft Illegal Content Judgements Guidance ('ICJG')<sup>1464</sup> published as part of our [Illegal Harms Consultation](#). Service providers should refer to this to understand the criteria for illegality in full.

### Key terms

**Table 8.10.1: Terms frequently used in this sub-section of the guidance or terms listed in the Act**

Term	Definition
<b>Encourages</b>	An act which recommends, advises, incites, induces or instigates children to engage in challenges or stunts highly likely to result in serious injury.
<b>Promotes</b>	An act which promotes or actively publicises, endorses or portrays stunts or challenges, that are highly likely to result in serious injury, as positive.

<sup>1463</sup> Section 62(8) of the Act

<sup>1464</sup> Ofcom, 2023. [Illegal Content Judgements Guidance](#).

Term	Definition
<b>Provides Instructions for</b>	An act which is instructive in nature, including describing steps, tips, or methods to engage in challenges or stunts which are highly likely to result in serious injury, in sufficient detail or clarity so that they may be emulated.
<b>Serious Injury</b>	Likely to cause significant, lasting, or permanent physical harm.
<b>Stunt</b>	An unusual or difficult action that is done in order to attract attention, for spectacle or entertainment purposes, to get publicity or popularity for the individual, group or organisation responsible for it. <sup>1465</sup>
<b>Challenge</b>	A difficult or demanding task, especially one seen as a test of one's abilities, strength or character. <sup>1466</sup>

## Additional context for services

- 8.10.3 In evaluating the risk of a particular stunt or challenge, services should consider both the likelihood of children copying the stunt or challenge, and the likelihood that it could result in serious injury to children (even if judged to be safe for adults).
- 8.10.4 Consistent with freedom of expression, there are many types of content containing stunts and challenges that we will not consider to be dangerous or harmful to children because of relevant contextual factors. For example, stunts undertaken by a highly-skilled or professional individuals, where these are not promoted or otherwise encouraged, are unlikely to be considered dangerous stunts and challenges content.
- 8.10.5 Certain contextual factors can be used to determine whether a challenge is likely to be emulated by children. Participation in challenges and stunts is often driven by social pressure, and content which involves direct encouragement by peers to take part is more likely to encourage children to emulate the challenge or stunt.
- 8.10.6 The information or commentary presented within or alongside the stunt or challenge content can impact whether a child is likely to emulate the stunt or challenge. Services should also consider factors which might make challenges easier to emulate, such as whether the content provides instructions for the dangerous stunt or challenge which are sufficiently detailed. An absence of important safety-related instructions or information relating to a dangerous stunts or challenges may also increase the likelihood of serious injury.
- 8.10.7 Some content relating to challenges or stunts may include commentary seeking to reduce the risk of harm. For example, services may encounter videos depicting a dangerous challenge or stunt, which contain warnings discouraging emulation (e.g. “do not try this at

<sup>1465</sup> Definition of ‘stunt’, [Adapted from Collins Dictionary](#) [accessed 24 April 2024]

<sup>1466</sup> Definition of ‘challenge’, [Adapted from Oxford English Dictionary](#) [accessed 24 April 2024]



home”). These content warnings may be relevant as contextual factors. However, services should note that such warnings can often be used to avoid detection and/or attempt to limit the personal liability of the individual posting it, and may not be sufficient to mitigate the risk of harm if the content includes other features that encourages children to enact stunts and challenges likely to result in serious injury.

8.10.8 Services should also be mindful that there may be overlap with other categories of harmful content. For example, ingestion challenges that involve consumption of harmful substances (e.g. cleaning products), or of substances in such a quantity as to be physically harmful (e.g. challenges encouraging excessive consumption of medication) (see Section 8.10). Further, challenges that encourage acts of self-harm (see Section 8.4) or suicide (see Section 8.3).

## Examples

### Examples or kinds of content that Ofcom considers to be dangerous stunts and challenges content that is harmful to children

8.10.9 The table below describes the kinds of dangerous stunts and challenges content that is harmful to children that Ofcom considers to meet the definition under the Act, along with a non-exhaustive list of examples.

8.10.10 We have not addressed the level or impact of harm within the below table. For further information on the risks and impact of harm, please see ‘Dangerous stunts and challenges content’ section of the Children’s Register of Risk (Section 7.8).

8.10.11 Many kinds of content will only meet the definition under the Act in certain, limited circumstances, which we illustrate with examples below.

**Table 8.10.2: Descriptions and examples of dangerous stunts and challenges content that is harmful to children**

Content description	Content examples
<p><b>Encouraging, or providing instructions for, others to partake in a stunt or challenge that could cause serious injury</b></p>	<p>Content encouraging, or providing instructions for, others to take part in challenges such as the following:</p> <ul style="list-style-type: none"> <li>• Asphyxiation challenges (e.g. blackout challenge, choking challenge)</li> <li>• Ingestion challenges (e.g. drinking large quantities of alcohol or liquid medication, drinking or eating harmful substances)</li> <li>• Challenges that encourage individuals to apply harmful substances to their skin where this could result in serious injury</li> <li>• Challenges to unsafely climb tall buildings or sit/stand on the edge of tall buildings and structures</li> </ul>

Content description	Content examples
<p><b>Encouraging others to emulate stunts carried out by professionals that could cause serious injury if emulated</b></p>	<ul style="list-style-type: none"> <li>• Content encouraging untrained individuals to replicate stunts undertaken by professionals in films or for entertainment, for example jumping out of a moving vehicle.</li> <li>• Content encouraging individuals to replicate dangerous stunts in the context of extreme sports, (e.g. snow sports, climbing, skate-boarding, or parkour), when the action is likely to cause serious harm if attempted by someone that has not been trained, and the post does not contain sufficient commentary relating to safety.</li> </ul>

## Examples or kinds of content Ofcom does not consider to be dangerous stunts and challenges content that is harmful to children

8.10.12 The below table describes some kinds of dangerous stunts and challenges content that Ofcom does not consider to meet the definition under the Act, along with a non-exhaustive list of examples.

8.10.13 The examples of content listed below do not meet the definition of Priority Content, but they may still be inappropriate for children of certain age groups.

**Table 8.10.3: Descriptions and examples of content that is no dangerous stunts and challenges content that is harmful to children**

Content description	Content examples
<p><b>Challenges which involve no risk of serious injury</b></p>	<ul style="list-style-type: none"> <li>• Challenges such as the ‘ALS ice bucket challenge’ where participants were encouraged to pour ice cold water over themselves to promote awareness of ALS (amyotrophic lateral sclerosis).</li> </ul>
<p><b>Challenges or stunts which are not likely to be encouraged</b></p>	<ul style="list-style-type: none"> <li>• Depictions of stunts undertaken by a professional, where there are no instructions to carry them out, and where these are not promoted or otherwise encouraged, e.g. videos showing professional stunt actor in a clip from a film.</li> <li>• Content depicting stunts and challenges in the context of extreme sports that, if instructional, provide sufficient safety-related information to reduce risk of serious harm if enacted.</li> </ul>

# 9. Glossary for Volume 3

This glossary of terms contains definitions for terms used throughout the draft Children’s Register of Risks and draft Guidance on Content Harmful to Children. These terms may also be referenced in other documents set out for consultation, such as the draft Children’s Risk Profiles. This glossary of terms explains how we have used some key words and phrases in the Children’s Register of Risks. It is intended to assist the reader, but to the extent that it simplifies, or is otherwise inconsistent with, any of the legal definitions set out in the Online Safety Act (“the Act”), the definitions in the Act prevail. In case of any conflict between terms used in this glossary and in any Children’s Safety Codes sections, the definition in the Children’s Safety Codes takes precedence.

## General

Term	Definition
<b>Characteristic</b>	In respect of a regulated service, includes references to its functionalities, user base, business models, governance and other systems and processes. <sup>1467</sup>
<b>Content</b>	Anything communicated by means of an internet service, whether publicly or privately, including written material or messages, oral communications, photographs, videos, visual images, music and data of any description. <sup>1468</sup>
<b>Cumulative harm</b>	Harm that occurs when harmful content (PPC, PC or NDC) is repeatedly encountered by a child, and/or when a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC. <sup>1469</sup>
<b>Harm</b>	Means physical or psychological harm. References to harm presented by content, and any other reference to harm in relation to content, have the same meaning given to it by section 235 of the Act. <sup>1470</sup>
<b>Illegal content</b>	Content that amounts to a relevant offence.
<b>Act</b>	Means the Online Safety Act 2023.
<b>Non-designated content</b>	A category of content harmful to children defined in the Act, broadly: content, which is not primary priority content or priority content, of a kind which presents a material risk of significant harm to an appreciable number of children in the United Kingdom. <sup>1471</sup>
<b>Part 3 or regulated search service</b>	Refers to a search service that falls within the definition of section 4 of the Act.
<b>Part 3 or regulated user-to-user service</b>	A user-to-user service, as defined in section 4 of the Act.

<sup>1467</sup> Section 98(11) of the Act.

<sup>1468</sup> Section 207(1) of the Act.

<sup>1469</sup> Section 234(4) of the Act.

<sup>1470</sup> Section 201 of the Act.

<sup>1471</sup> Section 60(2)(c) of the OS Act.

<b>Primary priority content</b>	A category of content that is harmful to children, as defined in section 61 of the Act. <sup>1472</sup>
<b>Priority content</b>	A category of content harmful to children, as defined in section 62 of the Act. <sup>1473</sup>
<b>Risk assessment</b>	Identifying and assessing the risk of harm to individuals from illegal content and content harmful to children, present on a Part 3 regulated service.
<b>Risk factor</b>	A characteristic associated with the risk of one or more kinds of harm.
<b>Risk of harm</b>	The possibility of individuals encountering harm on a Part 3 service.
<b>Search result</b>	In relation to a search service, this means content presented to a user of the service by operation of the search engine, in response to a search request made by the user. <sup>1474</sup>
<b>Search services</b>	An internet service that is, or includes, a search engine.
<b>U2U services</b>	Shorthand for 'user-to-user' service, which means an internet service by means of which content that is generated directly on the service by a user of the service, or uploaded to or shared on the service by a user of the service, may be encountered by another user, or other users, of the service.

## Functionalities and recommender systems

<b>Term</b>	<b>Definition</b>
<b>Anonymous user profiles</b>	User-to-user service functionality allowing users to create a user profile where their identity is unknown to an extent. This includes instances where a user's identity <sup>1475</sup> is unknown to other users; for example through the use of aliases ('pseudonymity'). It also includes where a user's identity may be unknown to a service, for example services that do not require users to register by creating an account.
<b>Commenting on content</b>	User-to-user service functionality that allows users to reply to content, or post content in response to another piece of content, visually accessible directly from the original content without navigating away from that content.
<b>Combining visual media</b>	User-to-user functionality that allows users to join together videos and/or images, often from different sources, into one piece of content that can be shared.
<b>Content editing</b>	Functionality type that comprises user-to-user functionalities which allow users to alter user-generated content before or after it is shared.
<b>Content exploring</b>	Functionality type that comprises user-to-user functionalities which allow users to explore and search for user-generated content.
<b>Content recommender systems</b>	Type of recommender system that is used to suggest and curate content that users are likely to find engaging, based on, for example, user preferences and/or history, but also content that is popular and trending on the service at a given moment.

<sup>1472</sup> We have typically grouped the different kinds of primary priority content as follows: pornographic content, suicide and self-harm content, eating disorder content.

<sup>1473</sup> We have typically grouped the different kinds of priority content as follows: abuse and hate content, bullying content, violent content, harmful substances content, dangerous stunts and challenges content.

<sup>1474</sup> Section 57(3) of the Act.

<sup>1475</sup> Identity refers to an individual's formal or officially recognised identity.

<b>Content storage and capture</b>	Functionality type that comprises user-to-user functionalities which allow users to record and store user-generated content.
<b>Content tagging</b>	User-to-user service functionality allowing users to assign a keyword or term to content that is shared.
<b>Direct messaging</b>	User-to-user service functionality allowing a user to send and receive a message to one recipient at a time, and which can only be immediately viewed by that specific recipient.
<b>Editing visual media</b>	User-to-user service functionality which allows users to alter or manipulate images and videos by means of the service.
<b>Encrypted messaging</b>	User-to-user service functionality that allows users to send and receive messages that are end-to-end encrypted.
<b>Ephemeral messaging</b>	User-to-user service functionality that that allows users to send messages that are automatically deleted after they are viewed by the recipient, or after a prescribed period of time has elapsed.
<b>Functionalities</b>	<p>In relation to a user-to-user service, includes any feature that enables interactions of any description between users of the service by means of the service.<sup>1476</sup></p> <p>In relation to a search service, includes (in particular): (a) a feature that enables users to search websites or databases; (b) a feature that makes suggestions relating to users' search requests (predictive search functionality).<sup>1477</sup></p> <p>In practice, when referring to functionalities in the draft Children's Register of Risks, 'functionalities' refers to the front-end features of a service. For user-to-user services, 'functionalities' refers to features that enable interaction between users. 'Functionalities for search services' refers to features that enable users to search websites or databases, as well as features that make suggestions relating to users' search requests.</p>
<b>Group messaging</b>	User-to-user service functionality allowing users to send and receive messages through a closed channel of communication to more than one recipient at a time.
<b>Image or video search</b>	Search service functionality that allows users to search for images and/or videos
<b>Hyperlinking</b>	User-to-user service functionality enabling users to access other internet services by clicking or tapping on content present on the service.
<b>Livestreaming</b>	User-to-user service functionality that allows users to simultaneously create and broadcast online streaming media in, or very close to, real time.
<b>Predictive search</b>	Search service functionality that anticipates a search query based on a variety of factors (including those related to the search results' ranking).
<b>Posting content</b>	User-to-user service functionality allowing users to upload and share content on open channels of communication.
<b>Posting goods or services for sale</b>	User-to-user service functionality allowing users to post content dedicated to offering goods and services for sale. This does not include paid-for advertisements, <sup>1478</sup> but may serve the function of allowing users to promote goods or services.

<sup>1476</sup> Section 233(1) of the Act. Please refer to section 233(2) of the Act for a non-comprehensive list of user-to-user functionalities.

<sup>1477</sup> Section 233(3) of the Act.

<sup>1478</sup> See 'advertising-based revenue model' in business models for more information.

<b>Posting or sending location information</b>	User-to-user service functionality allowing users to share their current or historic location, record a user's movement, or identify which other users of the service are nearby.
<b>Reacting to content</b>	User-to-user service functionality allowing users to express a reaction, such as approval or disapproval, of content that is shared by other users, through dedicated features that can be clicked or tapped by users. <sup>1479</sup>
<b>Recommender systems</b>	An algorithmic system which, by means of a machine learning model, determines the relative ranking of suggestions made to users on a U2U service. The overarching objective of recommender systems is to ensure that users receive suggestions they are likely to find relevant and engaging, thereby improving allocative efficiency in the digital marketplace. This can include suggesting connections, groups, events and content.
<b>Re-posting or forwarding content</b>	User-to-user service functionality which allows users to re-share content that has already been shared by a user.
<b>Stranger pairing</b>	User-to-user functionality that allows users who likely do not know each other into contact, often at random.
<b>Screen capturing or recording</b>	User-to-user service functionality that allows users to capture an image or record a video showing the contents of their display. <sup>1480</sup>
<b>Search prediction and personalisation</b>	Functionality type that comprises search service functionalities, allowing suggestions to be made relating to users' search requests.
<b>Search query inputs</b>	Search service functionality type by means of which users input search queries.
<b>Suggestive search</b>	Search service functionality that recommends search queries that refine or build on the initial search query made by a user.
<b>User communication</b>	Functionality type that comprises user-to-user service functionalities which allow users to communicate with one another, either synchronously or asynchronously. Includes communication across open and closed <sup>1481</sup> channels.
<b>User connections</b>	User-to-user service functionality that allows users to follow or subscribe to other users. Users must sometimes be connected in order to view all or some of the content that each user shares.
<b>User-generated content searching</b>	User-to-user service functionality allowing users to search for user-generated content by means of a user-to-user service.
<b>User groups</b>	User-to-user service functionality allowing users to create online spaces that are often devoted to sharing content on a particular topic. User groups are generally closed to the public and require an invitation or approval from existing members to gain access. However, in some cases they may be open to the public.
<b>User identification</b>	Functionality type that comprises user-to-user service functionalities which allow users to identify themselves to other users.
<b>User networking</b>	Functionality type that comprises user-to-user service functionalities which allow users to find or encounter each other, and establish contact.
<b>User profiles</b>	User-to-user service functionality that represents a collection of identifying information about a user, conveyed to other users of the

<sup>1479</sup> This for instance includes 'liking' or 'disliking' a post.

<sup>1480</sup> While users can often record or capture content using third-party services, screen recordings and captures are often shared on user-to-user services as user-generated content and some user-to-user services have dedicated screen recording and screen capturing functionalities.

<sup>1481</sup> See content audiences for definition of open and closed channels of communication.

	service. This includes information that may be displayed to other users such as images, usernames, and biographies. <sup>1482 1483</sup>
<b>User tagging</b>	User-to-user service functionality allowing users to assign other users, typically by their username, to content that is shared.

## Business models and commercial profile

Term	Definition
<b>Advertising-based revenue models</b>	Revenue models that generate income through payments for the display of advertisements promoting a product or service.
<b>Business models</b>	The way in which a business operates to achieve its goals. For the purposes of this risk assessment, this includes a service's revenue model and growth strategy. <sup>1484</sup>
<b>Commercial profile</b>	The size of the service in terms of capacity, <sup>1485</sup> the stage of service maturity and rate of growth in relation to users or revenue.
<b>Early-stage services</b>	Services in the initial phases of their lifecycle, typically encompassing the start-up and early growth stages. These are characterised by their early establishment, limited operational history, and ongoing efforts to establish themselves in the market.
<b>Growth strategy</b>	How the service plans to expand its business, for example, through increasing revenue and number of users.
<b>High-capacity services</b>	Services with a large number of employees and/or revenue. <sup>1486</sup>
<b>Low-capacity services</b>	Services with a small number of employees and/or revenue. <sup>1487</sup>
<b>Revenue model</b>	How a service generates income or revenue.
<b>Subscription-based revenue models</b>	Revenue models that generate income by selling access (or premium access) to a service for a period of time in return for a fee.

<sup>1482</sup> User profiles are distinct from user accounts, which are representations of a user in a service's information system. They may contain information required for registration to a particular service that are often attributes of a user's identity such as name, age, contact details and preferences.

<sup>1483</sup> Users can sometimes create fake user profiles, which are not a functionality in themselves, but are user profiles that impersonates another entity or are intentionally misleading.

<sup>1484</sup> 'Business model' can be defined more widely to describe the way in which a service creates value to its users (value proposition), how it delivers this value to users, and how it captures value for itself. However, we adopt a narrow definition in the risk assessment to avoid overlap with the other risk characteristics. This does not affect the overall risk assessment as risk factors that would have been identified under the broader definition are captured elsewhere.

<sup>1485</sup> In terms of number of employees and/or revenue.

<sup>1486</sup> Our evidence does not currently allow for quantitative thresholds to be drawn for service capacity. Services should nevertheless consider the number of employees and revenue as a risk factor.

<sup>1487</sup> Our evidence does not currently allow for quantitative thresholds to be drawn for service capacity. Services should nevertheless consider the number of employees and revenue as a risk factor.



## User base

Term	Definition
<b>Child user</b>	A user under the age of 18.
<b>Protected user characteristics</b>	Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. <sup>1488</sup>
<b>User base</b>	Users of a service. A user does not need to be registered with a service to be considered a user of that service. <sup>1489</sup>
<b>User base demographics</b>	Demographic make-up of the user base, including selected characteristics, intersectional dynamics and other relevant demographic factors.

## Governance, systems and processes

Term	Definition
<b>Age assurance</b>	A collective term for age verification and age estimation.
<b>Age verification</b>	A form of age assurance designed to verify the exact age of the user, for example using a form of identity documentation.
<b>Content moderation</b>	When a service reviews content to decide whether it is permitted on its platform (either by AI or a human moderator).
<b>Governance</b>	Structures that ensure the adequate oversight, accountability, and transparency of decisions within a service which affect user safety. This is in relation to organisational structure as well as product and content governance.
<b>Safety by design</b>	Putting user safety at the centre of the design and development of online services and processes.
<b>Service design</b>	The design of all the components that shape a user's end-to-end experience of a service. These components can include the business model or decision-making structures, back-end systems and processes, the user interface, and off-platform interventions.
<b>Systems and processes</b>	The actions taken by a service, including procedures to mitigate the risk of content harmful to children being encountered, such as human moderators and automated systems or processes.
<b>User access</b>	A user's entry into a service and ability to use the functionalities present on that service.

<sup>1488</sup> Section 4 of the Equality Act 2010.

<sup>1489</sup> Section 195 of the Act makes clear that 'it does not matter whether a person is registered to use a service' for them to be considered a 'user.'

## Service type

Term	Definition
<b>Discussion forums and chat room services</b>	A user-to-user service type describing general services that generally allow users to send or post messages that can be read by the public or an open group of people.
<b>Downstream general search service</b>	Search service type describing a subsection of general search services. Downstream general search services provide access to content from across the web, but they are distinct in that they obtain (or supplement) their search results from an index created by another general search service which relies solely on its own indexing (the 'upstream search service'). <sup>1490</sup>
<b>File-storage and file-sharing services</b>	User-to-user service type describing services whose primary functionalities involve enabling users to store digital content and share access to that content through links.
<b>Fundraising services</b>	User-to-user service type describing services that typically enable users to create fundraising campaigns and collect donations from users.
<b>General search services</b>	Search service type describing services that enables users to search the internet and which derives search results from an underlying search index (developed by either the service or a third party).
<b>Information-sharing services</b>	User-to-user service type describing services that are primarily focused on providing user-generated informational resources to other users.
<b>Messaging services</b>	User-to-user service type describing services that are typically centred around the sending and receiving of messages that can only be viewed or read by a specific recipient or group of people.
<b>Pornography services</b>	User-to-user service type whose principal purpose is the hosting or dissemination of pornographic content and who host user-generated pornographic content.
<b>Dating services</b>	User-to-user service type describing services that enable users to find and communicate with romantic or sexual partners.
<b>Gaming services</b>	User-to-user service type describing services that allow users to interact within partially- or fully-simulated virtual environments.
<b>Marketplaces and listings services</b>	User-to-user service type describing services that allow users to buy and sell their goods or services.
<b>Service type</b>	A characteristic that in general refers to the nature of the service. <sup>1491</sup> For example, social media services and messaging services.
<b>Social media services</b>	User-to-user service type describing services that connect users and enable them to build communities around common interests or connections.
<b>Vertical search services</b>	Search service type describing services that enable users to search for specific topics, or products or services offered by third-party providers. Unlike general search services, they do not return search results based on an underlying search index. Rather, they may use an API or equivalent technical means to directly query selected websites or databases with which they have a contract, and to return search results to users.
<b>Video-sharing services</b>	User-to-user service type describing services that allow users to upload and share videos with the public.

<sup>1490</sup> Some downstream general search services may not be in control of the operations of the search engine. In such a case, we expect the upstream search service would be the provider of the search service. However, there may be circumstances in which the downstream search service does exercise control, and in those circumstances the downstream service would be the provider.

<sup>1491</sup> Certain service types have been selected because our evidence suggests that they play a role in children encountering harmful content.

## Other terms

Term	Definition
<b>Algorithm Speak</b>	Algorithm speak or 'algorithmspeak' refers to coded language used online in order to circumvent content moderation methods.
<b>Autoplay features</b>	Feature that allows audiovisual content to continue playing without input from the user.
<b>Artificial intelligence chatbot</b>	An automated software program that uses artificial intelligence and natural language processing to simulate a conversation.
<b>Avatar research methodology</b>	Research methodology involving accounts or profiles set up on online services by researchers, modelled on the behaviours and interests of real users. This method, similar to the 'mystery shopping' market research approach, is often used to understand the experience of a service by a particular group of people.
<b>Bot</b>	An umbrella term that refers to a software application or automated tool which has been programmed by a person to carry out a specific or predefined task without any human intervention.
<b>Clear web</b>	Publicly accessible websites that are indexed by search engines.
<b>Content audience</b>	Refers to whether content is shared on open or closed channels of communication. Open channels are areas of services where content is visible to the general public or any user. Closed channels are areas of a service where content is limited to a smaller audience, and where users can expect more privacy, such as direct messaging or user groups that have controls or restrictions on who can join.
<b>Content format</b>	Refers to the format in which content is made available. This, for instance, includes content in the form of images, video, audio, text and emojis.
<b>Deepfake</b>	Specific type of media that involves the use of AI algorithms, particularly GenAI models, to modify videos, images or audio to create realistic synthetic content. This is often done by superimposing the face of a person onto the body of another person in a video or image, as well as voice manipulation with lip-syncing. Deepfakes are commonly shared as user-generated content on user-to-user services but could also potentially be created using functionalities present on user-to-user services. Deepfake technology is currently used to create content that can be harmful; however, we acknowledge that it may also have positive use cases.
<b>Doxxing</b>	The intentional online exposure of an individual's identity, private information or personal details without their consent. <sup>1492</sup>
<b>Pile-on</b>	Refers to when a user is criticized or targeted by a large number of other users, often as part of bullying campaigns.
<b>Rabbit hole</b>	The process of recommending ever more extreme content to users over time, which may occur as a result of users engaging with that type of content in the past. <sup>1493</sup>

<sup>1492</sup> eSafety Commissioner, 2020. [What is doxing or doxxing?](#) [accessed 18 April 2024].

<sup>1493</sup> Ofcom and PATTRN.AI, 2023. [Evaluating recommender systems in relation to the dissemination of illegal and harmful content in the UK](#) [accessed 22 April 2024].

<b>Filter bubble</b>	Describes the narrowing of content that is recommended to users, such that content feeds become homogenous and lack variety. Also often referred to as an 'echo chamber.'
<b>Generative artificial intelligence</b>	Also known as 'GenAI,' generative artificial intelligence is an emerging form of AI that refers to machine-learning models which can create new content in response to a user prompt. These tools can be used to produce text, images, audio, video and code, which closely resemble the broad datasets on which the models are trained.
<b>Infinite scrolling</b>	Feature enables content to be continuously loaded as the user scrolls down.
<b>Immersive technology</b>	A technology (most often used in gaming) which creates or enhances a realistic digital environment which users interact with.
<b>Indexing</b>	The process of collecting, parsing, and storing of data by a search engine to facilitate fast and accurate information retrieval.
<b>Leet speak</b>	Leet speak or 'l337 speak' refers to an informal online language where numbers or special characters are used to replace vowels or consonants.
<b>Meme</b>	An image or video that is spread widely on the internet, often altered by internet users for humorous effect. <sup>1494</sup>
<b>Stories</b>	Feature on some services that allows users to post images and videos that are ephemeral.
<b>Trolling</b>	Trolling is when someone post or comments online to deliberately upset others. <sup>1495</sup>
<b>Vent post</b>	Content that is typically posed by a user to express personal problems or challenges.
<b>Virtual private network (VPN)</b>	The creation of a private network over a public internet connection.

---

<sup>1494</sup> Collins Dictionary [accessed 18 April 2024].

<sup>1495</sup> eSafety Commissioner, 2024. [Trolling | What does trolling mean?](#) [accessed 18 April 2024].