

# Consultation response form

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Please complete this form in full and return to [protectingchildren@ofcom.org.uk](mailto:protectingchildren@ofcom.org.uk).

<b>Consultation title</b>	Consultation: Protecting children from harms online
<b>Full name</b>	Dean, J.

## Your response

Question	Your response
<p><b>Volume 2: Identifying the services children are using Children’s Access Assessments (Section 4).</b></p>	
<p><b>Do you agree with our proposals in relation to children’s access assessments, in particular the aspects below. Please provide evidence to support your view.</b></p> <ol style="list-style-type: none"> <li>1. Our proposal that service providers should only conclude that children are not normally able to access a service where they are using highly effective age assurance?</li> <li>2. Our proposed approach to the child user condition, including our proposed interpretation of “significant number of users who are children” and the factors that service providers consider in assessing whether the child user condition is met?</li> <li>3. Our proposed approach to the process for children’s access assessments?</li> </ol>	<p>Confidential? –N</p> <ol style="list-style-type: none"> <li>1. <b>Our proposal that service providers should only conclude that children are not normally able to access a service where they are using highly effective age assurance?</b> <p>Yes. This might seem a high bar, but approximately 50% of people under the age of 13 are accessing Social Media against minimum age rules, and a report from the Children’s Commissioner <a href="#">Children's Commissioner</a> highlighted that 58% of boys and 42% of girls (11-16) said that they have intentionally sought out porn online, so we must assume that children are accessing services unless we can prove otherwise.</p> </li> <li>2. <b>Our proposed approach to the child user condition, including our proposed interpretation of “significant number of users who are children” and the factors that service providers consider in assessing whether the child user condition is met?</b> <p>I fully support the approach to the child user condition. It is sensible that the two parts of this criteria are not cumulative. This ensures that platforms still need to be mindful of potential risk even if that service may not presently be accessed by children. In the event that the platform deems a service not to be likely accessed by children, the requirement on them to explain the steps they have taken to reach their conclusion and support their assessment outcome with evidence is a suitably robust measure to ensure transparency and accountability.</p> </li> </ol>

Question	Your response
	<p><b>3. Our proposed approach to the process for children’s access assessments? Please provide evidence to support your view.</b></p> <p>I believe it is necessary to have designed the access assessment process in a way that results in the majority of services falling into scope of being likely to be accessed by a “significant number” of children. The suggestion of starting with the second criteria of the “child user condition” is suitable as it ensures that platforms can expediate the decision making process. Crucially, the evidential requirement for those that deem their services “not likely to be accessed by children” is robust.</p> <p>The issue of quantifying what is deemed a “significant number of children” is a difficult one. I can appreciate that OFCOM is working with the hand that it has been dealt by The Act, but this will be interpreted differently amongst platforms and I believe it is naïve to expect platforms to make this judgement in the contextual spirit with which the Act was written.</p> <p>As a potential suggestion to measure what constitutes a “significant number” of children, a two-criteria approach could be used, where the figure is considered a “significant number” if it hits EITHER of the criteria, For example:</p> <ul style="list-style-type: none"> <li>• A definite number, e.g 100,000 monthly child users</li> <li style="padding-left: 20px;">OR</li> <li>• A percentage of the overall userbase, e.g 20%.</li> </ul> <p>Whichever figure is hit first, this would trigger that userbase containing a “significant number” of children. Contextually, this could work for platforms with a very large userbase in the millions, and also those with smaller userbases. Those thresholds would require consideration, based on “typical” figures of platform users, but could be planned to be cautiously low so as to remove the burden of a plat-</p>

Question	Your response
	<p>form having to interpret what constitutes a “significant number” in the context of their service, which will always be open to debate and abuse.</p> <p>I am pleased to see the depth of different “factors to consider whether a service is likely to be accessed by children” in section 4 of the guidance. I would recommend that the 4 headings of that section are included in the access assessment template, to help users to ensure they have thoroughly justified their decision when deciding their service is not likely to be accessed by a child.</p>
<p><b>Volume 3: The causes and impacts of online harm to children</b>  <b>Draft Children’s Register of Risk (Section 7)</b></p>	
<p><b>Proposed approach:</b></p> <p>4. Do you have any views on Ofcom’s assessment of the causes and impacts of online harms? Please provide evidence to support your answer.</p> <p>a. Do you think we have missed anything important in our analysis?</p> <p>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.</p> <p>6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer.</p> <p>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.</p> <p><b>Evidence gathering for future work:</b></p>	<p>Confidential? – N</p> <p><b>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.</b></p> <p>The assessment is right to highlight the significant role that Social Media plays in pushing pornography to children. Since this was written, X has changed their policy on Pornography, requiring the content poster to correctly label their content as pornographic. If they do not label their content correctly, this may still be encounterable by children on the site. This is a poorly designed process that is not fit for purpose, and an example of large platforms causing harm through poorly designed policy.</p> <p>I also believe it is worth mentioning the rise in “Only Fans” and similarly hosted pornography advertised via personal accounts on social media, particularly on X. These content creators are very savvy at manipulating algorithms to push their content to the top of comment lists, farming engagement through controversial posts</p>

Question	Your response
<p>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)?</p> <p>9. Have you identified risks to children from GenAI content or applications on U2U or Search services?</p> <p>a) Please Provide any information about any risks identified</p> <p>10. 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:</p> <p>a) (i) specific examples of body image or depressive content linked to significant harms to children,</p> <p>b. (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.</p> <p>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.</p>	<p>and comments on popular pages/tweets. Not only are they promoting a paid-for pornography service which influences young people’s perceptions and attitudes of women and sex, but there is also a sizeable portion of social media users that react negatively and with hostility towards these creators, thus also normalising that it is okay to display aggression towards women and girls.</p> <p>“Disappearing messages” are features of certain apps such as Snapchat that are mentioned in the guidance as a driver of violent content sharing and bullying. I believe this also drives sexual harrasment and risky sexual behaviours. The <a href="https://www.ofcom.gov.uk/consult/condocs/onlinecomms/onlinecomms_202206/onlinecomms_202206.pdf">Understanding online communications among children (ofcom.org.uk)</a> report states that:</p> <p><i>“13% of 11-18s have been sent pictures or videos of naked or half-dressed people and 10% have ever been asked to share these types of pictures or videos themselves. For 11-13-year-olds, these figures stand at 6% and 4% respectively. These potentially uncomfortable experiences can happen on a child’s first contact with another user. For example, 49% of 11-18s who received naked or half-dressed images said this was the first contact they’d had with the user. For others, these interactions/conversations occurred after a longer period of communication.”</i></p> <p>There were a number of high-quality sources used to inform this assessment, a lot of which we use to inform ourwork in Derbyshire. No further resources or analysis to suggest.</p> <p><b>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.</b></p> <p>No.</p>

Question	Your response
	<p><b>6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer.</b></p> <p>I think you are right to use refer to the “transitional” stage, although I would consider expanding it to 9-12 years as this is when the shift from using tablets to mobile phones starts to take-off (See graph on Page 9 of the <a href="https://www.ofcom.gov.uk/consult/condocs/childrens-media-literacy-report-2024/childrens-media-literacy-report-2024.pdf">Childrens Media literacy report 2024 (ofcom.org.uk)</a>).</p> <p><b>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.</b></p> <p>I agree that having a category of “Non-Designated Content” will keep platforms mindful of harms beyond those specified by the Act. Given how long it is taking for OFCOM to consider and consult on what may constitute a category of “NDC”, will OFCOM have timelines in place to consider and consult on emerging NDC categories on an ongoing, periodic basis in future? How long will it take for an emerging issue to be classified as NDC?</p> <p>I also agree that 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. This should also be extended to those from ethnic minority groups.</p> <p><b>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)?</b></p> <p>No</p> <p><b>9. Have you identified risks to children from GenAI content or applications on U2U or Search</b></p>

Question	Your response
	<p>services? Please provide information about any risks identified.</p> <p>No</p> <p><b>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.</b></p> <p>No</p> <p><b>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.</b></p> <p>“Anti-establishment content” – This does not necessarily meet the criteria of “inciting hatred” in Primary Content, but will affect a significant number of young people who will be influenced into a distrust of authorities and public services, which may cause a harmful knock-on effect. For example, consider the number of people influenced through the pandemic into distrusting the COVID vaccine. This distrust of genuine health advice can have a harmful long-term effect in how young-people engage with health services in future, or how they view the country’s political establishment.</p> <p>There will be a sizeable amount of content that fits this criteria without necessarily being deliberate misinformation or inciting hatred. This may also cover new, emerging themes in future that still carry a knock-on risk of harm.</p>
<p><b>Draft Guidance on Content Harmful to Children (Section 8)</b></p>	

Question	Your response
<p>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?</p> <p>13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?</p> <p>14. For each of the harms discussed, are there additional categories of content that Ofcom</p> <p>a) should consider to be harmful or</p> <p>b) consider not to be harmful or</p> <p>c) where our current proposals should be reconsidered?</p>	<p>Confidential? N</p> <p><b>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?</b></p> <p>Yes, and it is positive to see such detailed examples that can be applied. I also am pleased to see OFCOM acknowledge the number of cross-overs from the “illegal harms consultation” and content which may be “harmful to children”. The guidance states that content warnings are not adequate solutions to protect children from viewing harmful content, and I am pleased to see this, as well as inclusion of codewords, hashtags and sounds. This should keep platforms “on their toes” and needing to be reactive to changes in methods involved in posting these types of content.</p> <p><b>13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?</b></p> <p>No.</p> <p><b>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?</b></p> <p>No.</p>
<p><b>Volume 4: How should services assess the risk of online harms?</b></p> <p><b>Governance and Accountability (Section 11)</b></p>	
<p>15. Do you agree with the proposed governance measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide</p>	<p>Confidential? N</p> <p><b>15. Do you agree with the proposed governance measures to be included in the Children’s Safety Codes? Please confirm which proposed measure your views re-</b></p>



Question	Your response
<p>any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p> <p>16. Do you agree with our assumption that the proposed governance measures for Children's Safety Codes could be implemented through the same process as the equivalent draft Illegal Content Codes?</p>	<p><b>late to and explain your views and provide any arguments and supporting evidence. If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</b></p> <p>A service is considered “large” if it receives at least 7,000,000 UK monthly users. How often is a platform’s userbase reviewed, to see if it fits into scope of being a “large platform”? A new, emerging platform may carry a multitude of risk with the content that it hosts, and may not fall into scope for some time, leaving users at additional risk.</p> <p>GA7 – Could OFCOM provide the training to those platforms that are in scope, to achieve uniformity in understanding?</p> <p><b>16. Do you agree with our assumption that the proposed governance measures for Children's Safety Codes could be implemented through the same process as the equivalent draft Illegal Content Codes?</b></p> <p>Yes. Children’s safety codes can include evolving and emerging new issues that are not illegal, so it may involve a wider breadth of content (The NDC categories will always be open to change), but platforms may choose to have an internal role covering this that reports to the named accountable person.</p>
<p><b>Children’s Risk Assessment Guidance and Children’s Risk Profiles’ (Section 12)</b></p>	
<p>17. What do you think about our proposals in relation to the Children’s Risk Assessment Guidance?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p>	<p>Confidential? – Y / N</p>

Question	Your response
<p>18. What do you think about our proposals in relation to the Children’s Risk Profiles for Content Harmful to Children?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>Specifically, we welcome evidence from regulated services on the following:</p> <p>19. Do you think the four-step risk assessment process and the Children’s Risk Profiles are useful models to help services understand the risks that their services pose to children and comply with their child risk assessment obligations under the Act?</p> <p>20. Are there any specific aspects of the children’s risk assessment duties that you consider need additional guidance beyond what we have proposed in our draft?</p> <p>21. Are the Children’s Risk Profiles sufficiently clear and do you think the information provided on risk factors will help you understand the risks on your service?</p> <p>a) If you have comments or input related to the links between different kinds of content harmful to children and risk factors, please refer to Volume 3: Causes and Impacts of Harms to Children Online which includes the draft Children’s Register of Risks.</p>	
<p><b>Volume 5 – What should services do to mitigate the risk of online harms</b></p> <p><b>Our proposals for the Children’s Safety Codes (Section 13)</b></p>	

Question	Your response
<p><b>Proposed measures</b></p> <p>22. Do you agree with our proposed package of measures for the first Children’s Safety Codes?</p> <p>a) If not, please explain why.</p> <p><b>Evidence gathering for future work.</b></p> <p>23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?</p> <p>a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results from trialling or testing of measures.</p> <p>24. Are there other areas in which we should consider potential future measures for the Children’s Safety Codes?</p> <p>a) If so, please explain why and provide supporting evidence.</p>	<p>Confidential? –N</p> <p><b>22. Do you agree with our proposed package of measures for the first Children’s Safety Codes? If not, please explain why.</b></p> <p>Largely, yes. Could some consideration be given to whether recommender algorithms are required at all for younger children? Parents are already concerned about screen time, and recommender algorithms drive engagement up and keep children using their service for longer. This is before we even begin to consider risks of inappropriate content that is recommended by algorithms.</p> <p><b><u>Evidence gathering for future work</u></b></p> <p><b>23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration? If so, please provide evidence of the impact, effectiveness and costs of such measures, including any results from trialling or testing of measures.</b></p> <p>No</p> <p><b>24. Are there other areas in which we should consider potential future measures for the Children’s Safety Codes? If so, please explain why and provide supporting evidence.</b></p> <p>Linking a child’s account to a parent’s account, for greater parental oversight of searches, activity and engagement, expanding on the already offered “Family Centre” features on some platforms.</p>

## Developing the Children's Safety Codes: Our framework (Section 14)

25. Do you agree with our approach to developing the proposed measures for the

Children's Safety Codes?

a) If not, please explain why.

26. Do you agree with our approach and proposed changes to the draft Illegal Content Codes to further protect children and accommodate for potential synergies in how systems and processes manage both content harmful to children and illegal content?

a) Please explain your views.

27. Do you agree that most measures should apply to services that are either large services or smaller services that present a medium or high level of risk to children?

28. Do you agree with our definition of 'large' and with how we apply this in our recommendations?

29. Do you agree with our definition of 'multi-risk' and with how we apply this in our recommendations?

30. Do you agree with the proposed measures that we recommend for all services, even those that are small and low-risk?

Confidential? –N

**25. Do you agree with our approach to developing the proposed measures for the Children's Safety Codes? Please explain why.**

Yes, it was noticeable the amount of time and effort that has gone into researching online harms to children in the publication of recent research papers. The online communications qualitative research conducted by BMG was of too small of a sample size though to be truly reflective of children in the UK.

**26. Do you agree with our approach and proposed changes to the draft Illegal Content Codes to further protect children and accommodate for potential synergies in how systems and processes manage both content harmful to children and illegal content? Please explain your views.**

Yes, there are a number of crossovers between content that is harmful to children and that which is illegal. Those processes and staffing should already be in place for illegal content, which would mean adding a smaller cost for the business for children's harms. The economy of scale also means that it is of extra importance to be proportionate in requiring "large" platforms to undertake this cost, rather than smaller platforms.

**27. Do you agree that most measures should apply to services that are either large services or smaller services that present a medium or high level of risk to children?**

Yes.

**28. Do you agree with our definition of 'large' and with how we apply this in our recommendations?**

Yes, it makes sense to align it with EU definitions. Calculating "large" as an average over 12 months is practical, however I think some consideration should be given to the "boom and bust" nature of popular app culture. For example, apps like "House Party" went from relatively unknown to household names within a few weeks. Would they necessarily fall into scope straight away to

	<p>be recognised as a “large platform”? Or would the popularity fade before the app has had chance to be responsive to its obligations?</p> <p><b>29. Do you agree with our definition of ‘multi-risk’ and with how we apply this in our recommendations?</b></p> <p>Yes</p> <p><b>30. Do you agree with the proposed measures that we recommend for all services, even those that are smaller and low-risk?</b></p> <p>Yes. Terms of service, reporting and content moderation seems appropriate.</p>
<p><b>Age assurance measures (Section 15)</b></p>	
<p>31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures AA1-6? Please provide any information or evidence to support your views.</p> <p>a) Are there any cases in which HEAA may not be appropriate and proportionate?</p> <p>b) In this case, are there alternative approaches to age assurance which would be better suited?</p> <p>32. Do you agree with the scope of the services captured by AA1-6?</p> <p>33. Do you have any information or evidence on different ways that services could use highly effective age assurance to meet the outcome that children are prevented from encountering identified PPC, or protected from encountering identified PC under Measures AA3 and AA4, respectively?</p> <p>34. Do you have any comments on our assessment of the implications of the</p>	<p>Confidential? –N</p> <p><b>31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures AA1-6? Are there any cases in which HEAA may not be appropriate and proportionate? In this case, are there alternative approaches to age assurance which would be better suited? Please provide any information or evidence to support your views.</b></p> <p>Yes, but AA3 requires the platform to be efficient at identifying PPC on the service. If they are ineffective at doing this, then there’s no point in having HEAA.</p> <p><b>32. Do you agree with the scope of the services captured by AA1-6?</b></p> <p>Yes. Medium-risk seems an appropriate lower threshold of services in scope.</p> <p><b>33. Do you have any information or evidence on different ways that services could use highly effective age assurance to meet the outcome that children are prevented from encountering identified PPC, or protected</b></p>

<p>proposed Measures AA1-6 on children, adults or services?</p> <p>a) Please provide any supporting information or evidence in support of your views.</p> <p>35. Do you have any information or evidence on other ways that services could consider different age groups when using age assurance to protect children in age groups judged to be at risk of harm from encountering PC?</p>	<p><b>from encountering identified PC under Measures AA3 and AA4, respectively?</b></p> <p>No, but for AA5 and AA6, any user who uploads content that is identified as incorrectly marked PPC or PC should be blacklisted from recommender algorithms to avoid their content being promoted to children.</p> <p><b>34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services? Please provide any supporting information or evidence in support of your views.</b></p> <p>No.</p> <p><b>35. Do you have any information or evidence on other ways that services could consider different age groups when using age assurance to protect children in age groups judged to be at risk of harm from encountering PC?</b></p> <p>Some apps already have a “family centre” where parents can link their account to their child’s, and can see the people who their child has been talking to. Perhaps the “family centre” could be used to notify parents when their children have been shown any PPC or PC that has been identified after it has already been pushed to the child by recommender algorithms. This could enable parents to be made aware of potential issues and talk to their children about them.</p>
<p><b>Content moderation U2U (Section 16)</b></p>	
<p>36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes?</p> <p>a) Please provide any arguments and supporting evidence.</p>	<p>Confidential? – Y / N</p> <p><b>36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</b></p> <p>I think CM2, CM3 and CM4 should apply to ALL U2U services. You can still be proportionate in your expectations of those services without requiring them to spend money that they don’t have on staffing. They should still</p>

	<p>have policies and targets that are reflective of their responsibilities and resources.</p> <p><b>37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes? Please provide any arguments and supporting evidence.</b></p> <p>Yes.</p>
<p><b>Search moderation (Section 17)</b></p>	
<p>38. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>39. Are there additional steps that services take to protect children from the harms set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>40. Regarding Measure SM2, do you agree that it is proportionate to preclude users believed to be a child from turning the safe search settings off?</p> <p>The use of Generative AI (GenAI), see Introduction to Volume 5, to facilitate search is an emerging development, which may include where search services have integrated GenAI into their functionalities, as well as where standalone GenAI services perform search functions. There is currently limited evidence on how the use of GenAI in search services may affect the implementation of the safety measures as set out in this code. We welcome further evidence from stakeholders on the following questions and please provide arguments and evidence to support your views:</p> <p>41. Do you consider that it is technically feasible to apply the proposed code measures in respect of GenAI</p>	<p>Confidential? –N</p> <p><b>38. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views.</b></p> <p>Yes, although SM3, SM4 and SM5 should apply to ALL search platforms.</p> <p><b>39. Are there additional steps that services take to protect children from the harms set out in the Act? If so, how effective are they?</b></p> <p><b>40. Regarding Measure SM2, do you agree that it is proportionate to preclude users believed to be a child from turning the safe search settings off?</b></p> <p>Yes, that is central to the ethos of the Act: Adults should have a choice, but children should not.</p> <p><b>41. Do you consider that it is technically feasible to apply the proposed code measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions? Please provide arguments and evidence to support your view.</b></p> <p>Unsure.</p> <p><b>42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions? Please provide arguments and evidence to support your view.</b></p>

<p>functionalities which are likely to perform or be integrated into search functions?</p> <p>42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions?</p>	<p>Unsure.</p>
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**User reporting and complaints (Section 18)**

<p>43. Do you agree with the proposed user reporting measures to be included in the draft Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p> <p>44. Do you agree with our proposals to apply each of Measures UR2 (e) and UR3 (b) to all services likely to be accessed by children for all types of complaints?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p> <p>45. Do you agree with the inclusion of the proposed changes to Measures UR2 and UR3 in the Illegal Content Codes (Measures 5B and 5C)?</p>	<p>Confidential? – N</p> <p><b>43. Do you agree with the proposed user reporting measures to be included in the draft Children’s Safety Codes? Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</b></p> <p>I would like to see UR2(d) recognise the potential of sharing complaints progress with a linked parental account, via “family centre” on some apps that use this.</p> <p><b>44. Do you agree with our proposals to apply each of Measures UR2 (e) and UR3 (b) to all services likely to be accessed by children for all types of complaints? Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</b></p> <p>I would like to see UR2(e) strengthened to protect the complainant’s anonymity even at appeal stage, as this could be a barrier to reporting. Even though this point has been covered in detail, I still believe anonymity should be guaranteed.</p> <p>I welcome the inclusion in UR3(B) that the provider should notify the complainant about whether they will hear the outcome of their complaint. This should be</p>
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a) Please provide any arguments and supporting evidence.

strengthened to make it mandatory, as platforms may simply choose to not give feedback on the outcome. This is unacceptable as without feedback many will simply choose not to report in future and lose faith in the platform's ability to safeguard them.

**45. Do you agree with the inclusion of the proposed changes to Measures UR2 and UR3 in the Illegal Content Codes (Measures 5B and 5C)? Please provide any arguments and supporting evidence.**

Yes.

**Terms of service and publicly available statements (Section 19)**

46. Do you agree with the proposed Terms of Service / Publicly Available Statements measures to be included in the Children’s Safety Codes?

a) Please confirm which proposed measures your views relate to and provide any arguments and supporting evidence.

b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.

47. Can you identify any further characteristics that may improve the clarity and accessibility of terms and statements for children?

48. Do you agree with the proposed addition of Measure 6AA to the Illegal Content Codes?

a) Please provide any arguments and supporting evidence.

Confidential? – N

**46. Do you agree with the proposed Terms of Service / Publicly Available Statements measures to be included in the Children’s Safety Codes? Please confirm which proposed measures your views relate to and provide any arguments and supporting evidence. If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.**

Yes.

**47. Can you identify any further characteristics that may improve the clarity and accessibility of terms and statements for children?**

A summary version of terms, statements and risk-assessment findings with simpler to understand, child-friendly language should also be published.

**48. Do you agree with the proposed addition of Measure 6AA to the Illegal Content Codes? Please provide any arguments and supporting evidence.**

Yes.

**Recommender systems (Section 20)**

49. Do you agree with the proposed recommender systems measures to be included in the Children’s Safety Codes?

a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

b) If you responded to our illegal harms consultation and this is relevant

Confidential? – N

**49. Do you agree with the proposed recommender systems measures to be included in the Children’s Safety Codes? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence. If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.**

to your response here, please signpost to the relevant parts of your prior response.

50. Are there any intervention points in the design of recommender systems that we have not considered here that could effectively prevent children from being recommended primary priority content and protect children from encountering priority and non-designated content?

51. Is there any evidence that suggests recommender systems are a risk factor associated with bullying? If so, please provide this in response to Measures RS2 and RS3 proposed in this chapter.

52. We plan to include in our RS2 and RS3, that services limit the prominence of content that we are proposing to be classified as non-designated content (NDC), namely depressive content and body image content. This is subject to our consultation on the classification of these content categories as NDC. Do you agree with this proposal? Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.

- Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.

**50. Are there any intervention points in the design of recommender systems that we have not considered here that could effectively prevent children from being recommended primary priority content and protect children from encountering priority and non-designated content?**

Introduce a requirement for content platforms to have a “dislike” button. This does not need to visibly show the number of dislikes in the same way that “likes” are typically displayed, but it will influence the recommender algorithm to show that the user did not like the content even though they engaged with it. This way, we can move away from content being assumed to be of interest just because the user has watched it.

When content is uploaded, is there potential for a “buffer period” where extra checks are carried out to ensure it is not PCC or PC, before allowing it to be publicly viewable? This could be proportionate such as checking a systematic percentage of uploaded content before making it publicly available, or checking the content of those users who have previously uploaded PPC or PC content.

**51. Is there any evidence that suggests recommender systems are a risk factor associated with bullying? If so, please provide this in response to Measures RS2 and RS3 proposed in this chapter.**

Unsure.

**52. We plan to include in our RS2 and RS3, that services limit the prominence of content that we are proposing to be classified as non-designated content (NDC), namely depressive content and body image content. This is subject to our consultation on the classification of these content categories as NDC. Do you agree with this proposal? Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.**

“Limit the prominence” sounds like something that platforms won’t take seriously. When the NDC proposals are finalised, more steps should be included here to detail how platforms should limit the prominence.

<b>User support (Section 21)</b>	
<p>53. Do you agree with the proposed user support measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p>	<p>Confidential? – N</p> <p><b>53. Do you agree with the proposed user support measures to be included in the Children’s Safety Codes? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence. If you responded to our Illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</b></p> <p>Yes.</p>
<b>Search features, functionalities and user support (Section 22)</b>	
<p>54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views.</p> <p>55. Do you have additional evidence relating to children’s use of search services and the impact of search functionalities on children’s behaviour?</p> <p>56. Are there additional steps that you take to protect children from harms as set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>As referenced in the Overview of Codes, Section 13 and Section 17, the use of GenAI to facilitate search is an emerging development and there is currently limited evidence on how the use of GenAI in search services may affect the implementation of the</p>	<p>Confidential? – N</p> <p><b>54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views.</b></p> <p>Yes</p> <p><b>55. Do you have additional evidence relating to children’s use of search services and the impact of search functionalities on children’s behaviour?</b></p> <p>No</p> <p><b>56. Are there additional steps that you take to protect children from harms as set out in the Act? If so, how effective are they?</b></p> <p>No</p>

safety measures as set out in this section. We welcome further evidence from stakeholders on the following questions and please provide arguments and evidence to support your views:

57. Do you consider that it is technically feasible to apply the proposed codes measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions? Please provide arguments and evidence to support your views.

**57. Do you consider that it is technically feasible to apply the proposed codes measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions? Please provide arguments and evidence to support your views.**

Unsure

**Combined Impact Assessment (Section 23)**

58. Do you agree that our package of proposed measures is proportionate, taking into account the impact on children’s safety online as well as the implications on different kinds of services?

Confidential? – N

**58. Do you agree that our package of proposed measures is proportionate, taking into account the impact on children’s safety online as well as the implications on different kinds of services?**

Yes. Platforms have profited for long enough whilst their child users are exposed to unchecked harm. I fully support OFCOM’s measures and the associated costs to platforms.

**Statutory tests (Section 24)**

59. Do you agree that our proposals, in particular our proposed recommendations for the draft Children’s Safety Codes, are appropriate in the light of the matters to which we must have regard?

a) If not, please explain why.

Confidential? – N

**59. Do you agree that our proposals, in particular our proposed recommendations for the draft Children’s Safety Codes, are appropriate in the light of the matters to which we must have regard? If not, please explain why.**

Yes

**Annexes**

**Impact Assessments (Annex A14)**

60. In relation to our equality impact assessment, do you agree that some of our proposals would have a positive impact on certain groups?

61. In relation to our Welsh language assessment, do you agree that our proposals are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English?

Confidential? – Y / N

a) If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.	
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**Additional Thoughts:**

This is not very well understood at public level, and OFCOM could be much better at promoting the progress of their regulatory responsibilities towards the Online Safety Act. There has been very limited public awareness raising of the Online Safety Act in general, its new criminal offences or the ways in which users' experiences online will be changing. If OFCOM's work is going to make online platforms a safer place for children, then children and families need to know this. They need to be told that reporting processes are expected to become more transparent and easier to access, in order to understand that the online platform should be held to account against these standards.

OFCOM might be aware of the recent rise in the movement for a "Smartphone-Free Childhood", which has seen thousands of parents sign up from across the country. I recently ran a webinar for parents with Derbyshire PCC-commissioned-service "i-Vengers", where we explored the pros and cons of a "Smartphone-Free childhood". Parents seemed largely in favour of removing devices from their children, partly because they do not believe that regulation and enforcement is keeping pace with risk on social media. They did not believe that platforms are doing anywhere near enough to keep their children safe. The Online Safety Act and OFCOM's regulatory work has the power to be hugely positive and transformative, and OFCOM badly needs to give parents a cause for optimism in the field by better promoting its proposals.

OFCOM's own [Understanding online communications among children: Qualitative findings \(ofcom.org.uk\)](#) report (amongst other high quality sources) points towards apathy towards negative experiences: they are seen as part and parcel of being online. We need to change that perspective and raise awareness that this is no longer to be accepted under UK legislation.

Please complete this form in full and return to [protectingchildren@ofcom.org.uk](mailto:protectingchildren@ofcom.org.uk).