

# 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>Organisation name</b>	Internet Matters

## Protecting children from harms online: Response to Ofcom consultation

July 2024

### About Internet Matters

**Internet Matters is a not-for-profit organisation dedicated to supporting parents and professionals to keep children safe and well online.** We are one of the most popular information sources among parents. We were able to provide crucial online safety and wellbeing advice to over 9 million visitors in 2023, of which 95% felt prepared to handle online safety issues that their child might encounter as a result.

In addition to our expert guides and resources for parents and teachers, we also have a Policy and Research function. We use our insights to **champion the views and interests of families, making evidence-based recommendations to all those with influence over children’s digital lives.** This includes our industry partners as well as government, policymakers and parliamentarians.

Internet Matters is represented on the Executive Board of the UK Council for Internet Safety (UKCIS) and Ofcom’s Making Sense of Media Panel. We chair UKCIS’s Vulnerable Users Working Group.

### About this submission

Internet Matters supports the importance of online safety regulation. **We welcome the speed with which Ofcom has assumed its duties to identify harms and establish its regulatory approach to protecting children.** The scale of the challenge is significant. Alongside the draft Illegal Harms proposals,<sup>1</sup> again **we lend our support to Ofcom in its effort to establish a safer online world for children.**

In particular, the draft Children’s Register of Risks (Volume 3) a strong piece of work. We will offer our own up-to-date evidence on the nature of the risks/harms that children experience, including differences by age, gender, vulnerability and other characteristics.

However, we have a number of concerns about the scope and approach that Ofcom is taking through the draft Code of Practice.<sup>2</sup>

### Overarching concerns

As it is currently drafted, **we are concerned that the Code will fail to deliver what parents and Parliament expect the Online Safety Act to achieve: a safe and age-appropriate online environment for every child in the UK.** To realise this, platforms will need to maintain a robust understanding of the likely age of users, and with this information apply age-appropriate protections for every child *by default*. **Children exist within families, and the role of parents and caregivers must be formalised within safety measures if they are to succeed.**

The goal of regulation should be to create a culture where companies race to invest in children’s safety. But we believe there is a risk that the draft Code doesn’t go far enough in addressing the risks that children face online – both today and in the future. **Realising the intention of Parliament and parents is all the more pivotal in the face of growing calls to restrict children’s access to connected technologies altogether.**

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<sup>1</sup> Internet Matters, 2024, *Response to Illegal Harms Consultation*, [link](#).

<sup>2</sup> Ofcom, 2024, *Volume 5: What should services do to mitigate the risks of online harms to children?* [Link](#).

## Key points of this submission

1. **Age assurance.** It is disappointing that Ofcom have taken the decision not to recommend that age assurance be deployed to estimate children's ages (i.e. age ranges below hard 18+ thresholds). Age assurance is critical to unlocking the effectiveness of many child protection provisions, including both age-appropriate experiences<sup>3</sup> and enforcement of minimum age requirements on platforms. We recommend that Ofcom reconsiders its position on age assurance as an urgent priority.
2. **'Highly effective' age assurance.** Many of the key measures in the draft Code of Practice rely directly on age-gating mechanisms to provide high-standards of protection for children. Given the fundamental importance of age assurance within the regime, we feel that age assurance requirements should be sufficiently robust – for example, through continuous age checks on platform, support and advice for children who fail age checks and stronger measures to prevent the use of VPNs to circumvent age assurance.
3. **The role of parents.** Ofcom's ultimate objective for the Code of Practice is to ensure safer online experiences for all children. To realise this, the role of parents and caregivers must be formalised with a greater focus on protective factors in the home, such as parental controls and enabling parents to advocate on behalf of their children. In order to avoid driving families offline, we also recommend that Ofcom focuses on outreach to parents about the regime, including the role that caregivers will continue to play to keep their children safe online.
4. **Communication of terms and conditions, reports and complaints.** User reporting and complaints systems are a crucial aspect of efforts to tackle harm online. However, it is important to highlight that many children who experience harm online do not report it to the platform, and that often this is because they have had negative experiences with these or a general perception that nothing will happen. In our most recent Digital Tracker survey, we find that under a quarter (24%) of children who experienced harm online reported it to the platform. We recommend that reporting and complaints measures are strengthened in the draft codes, to ensure that children's reports are clearly timebound and prioritised for human review.
5. **Child-on-child harm.** As set out in our response to the consultation on Illegal Harms, we suggest that Ofcom takes a differentiated approach to child-on-child online harms, such as bullying and harassment. The dynamics, risk factors and barriers to reporting child-perpetrated harm differ from other issues addressed by the Code and this should be reflected in the way that Ofcom regulates these issues.
6. **Read across with the media literacy strategy.** Above the specific proposals made within the draft consultation documents, we firmly feel that a broader piece of work is needed to build a coherent read-across between Ofcom's existing role in promoting media literacy<sup>4</sup> and with its new powers as the Online Safety Regulator. We are concerned that little – so far – has been done to ensure that young people and parents across the country are informed about what Ofcom's regulation of online services will mean for them. We think that this point sits across the major planks of the regime and Ofcom's draft three-year strategy for media literacy.<sup>5</sup>

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<sup>3</sup> Ofcom, 2024, Child development ages, stages and online behaviour: Overview of research and evidence, [link](#).

<sup>4</sup> Ofcom, 2024, *A Positive Vision for Media Literacy: A consultation on Ofcom's Three-Year Media Literacy Strategy*, [link](#).

<sup>5</sup> Internet Matters, 2024, *Response to consultation on Ofcom's Three-Year Media Literacy Strategy*, [link](#).

## Volume 3: The causes and impacts of online harm to children - Draft Children’s Register of Risk (Section 7)

### 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.

*Not confidential*

Internet Matters conducts an extensive research programme which is designed to provide us with insight into families’ experiences of digital platforms and technologies. **To inform our response to this consultation, we are drawing upon our two major data sources on the prevalence and impact of illegal online harms to provide more granular information on the online risks to children in particular.**

- We conduct a twice-yearly ‘**Digital Tracker survey**’ with a nationally representative sample of over 2,000 parents and 1,000 children aged 9-16. We present child participants with a list of harmful experiences and ask them to select any harms that they have experienced and the impact that it had on them. We ask a corresponding question to parents, asking them which harms they believe that their child has experienced and the degree of impact – this allows us to make important comparisons between what children experience and what parents know and understand about those interactions.
- Our flagship **Digital Wellbeing Index** is an annual study designed to assess the impact of digital technology on children’s lives – both positive and negative – and the factors which shape children’s outcomes. The study is based on a four-dimensional framework of digital wellbeing (developmental, emotional, physical and social) developed in collaboration with the University of Leicester. Findings are based on a detailed household survey of 1,000 children and their parents.

We also conduct regular **deep dive research projects** on particular themes, including emerging tech (examples include generative AI, the metaverse and cryptocurrencies) and thematic issues (examples include vulnerability, online misogyny and image-based abuse).

This response is structured in such a way to provide the best possible overview of our evidence relating to children’s experience of Primary Priority Content (PPC) and Priority Content (PC) and the impact that harmful content and behaviour has on them, as well as parental awareness. In this response we set out our latest data on:

- **The prevalence of PPC and PC**, including parental awareness of these harms
- **The impact of PPC and PC on children**
- **The experience of vulnerable children of PPC and PC**

#### The prevalence of PPC and PC

Across our twice-yearly Digital Tracker survey, we ask children about their exposure to a number of online harms – including both legal and illegal content and behaviour. We find that exposure to PPC<sup>6</sup> and PC<sup>7</sup> is widespread among children of all age groups surveyed. Note that survey questions relating to PPC are restricted to children aged 13 and above.

##### (1) Overall exposure to PPC

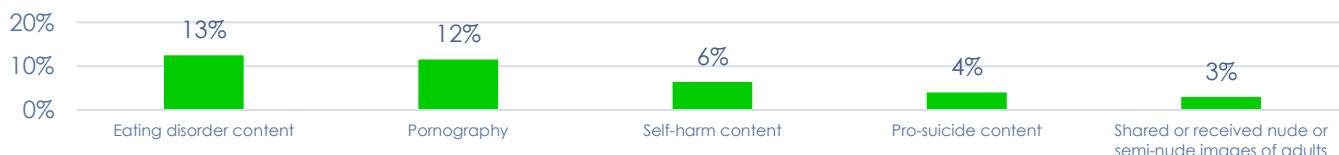


Figure 1 - Exposure to Primary Priority Content (PPC), children aged 13-17 (nationally representative sample, n=556), May 2024

<sup>6</sup> As defined by Section 61 of the Online Safety Act (2023)

<sup>7</sup> As defined by Section 62 of the Online Safety Act (2023)

**(2) Overall exposure to PC**

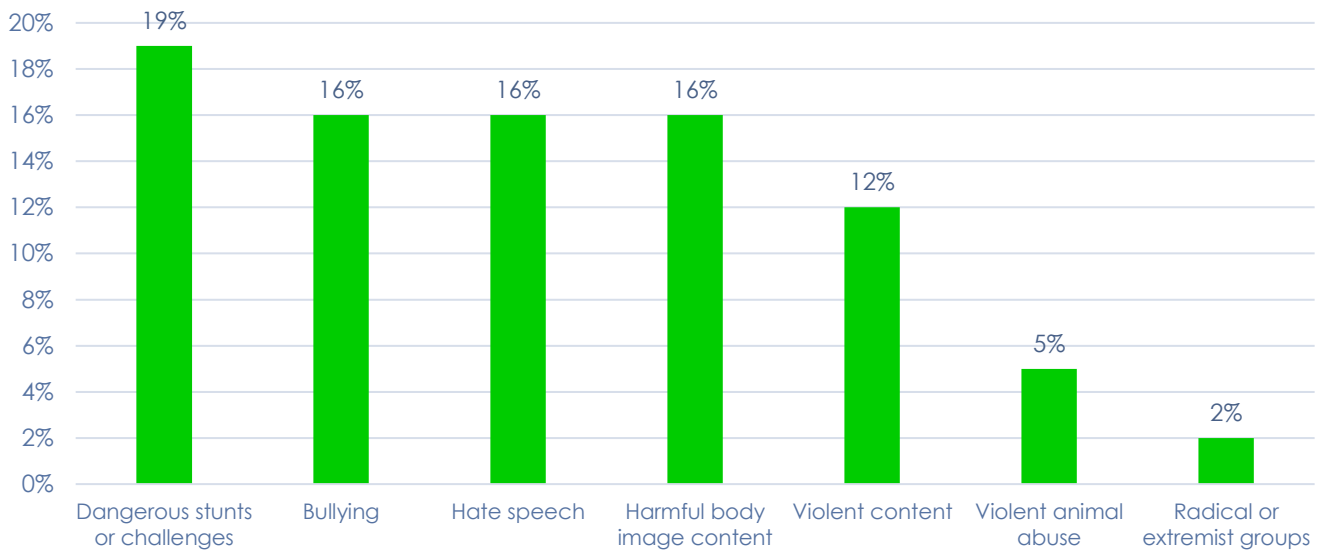


Figure 2 - Exposure to Priority Content (PC), children aged 9-17 (nationally representative sample, n=1000), May 2024

**(3) Gendered exposure to PC**

When segmented by gender, we see that some harms are more likely to impact on certain genders. Figure 3 shows categories of PC where there is a statistically significant difference by gender.

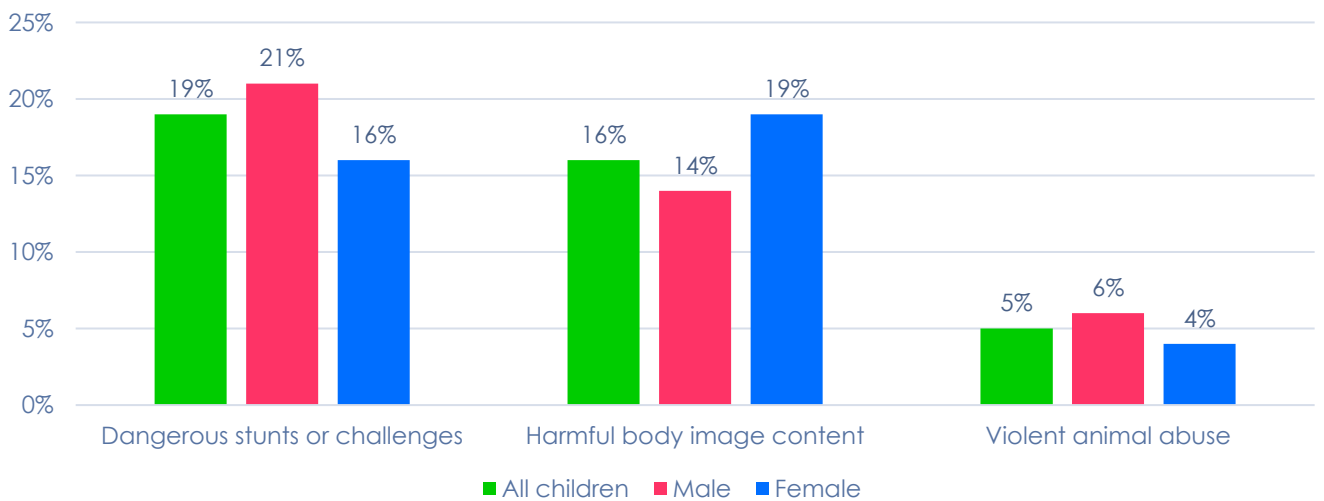


Figure 3 - Exposure to PC, children aged 9-17 (nationally representative sample, n=1000) by gender, May 2024

We find that **girls are significantly more likely to be experience to content featuring unrealistic or altered bodies**, while **boys are more likely to be exposure to content featuring dangerous stunts and challenges and violent animal abuse**.

**What parents understand about children’s experience of PPC and PC**

We also ask 2,000 parents (not necessarily of the same household) a corresponding set of questions about their children’s experience of online harms. From this, we are able to draw comparisons around children’s **actual experiences** of harmful content and **parents’ reports** of their children experiencing harmful content.

Figures 4 and 5 show that parents generally underestimate the extent to which children experience some PPC (eating disorder content and pornography) as well as a number of PC categories – in particular exposure to content promoting dangerous challenges, harmful/unrealistic body images and violent content.

**(1) Parental awareness of children’s exposure to PPC**

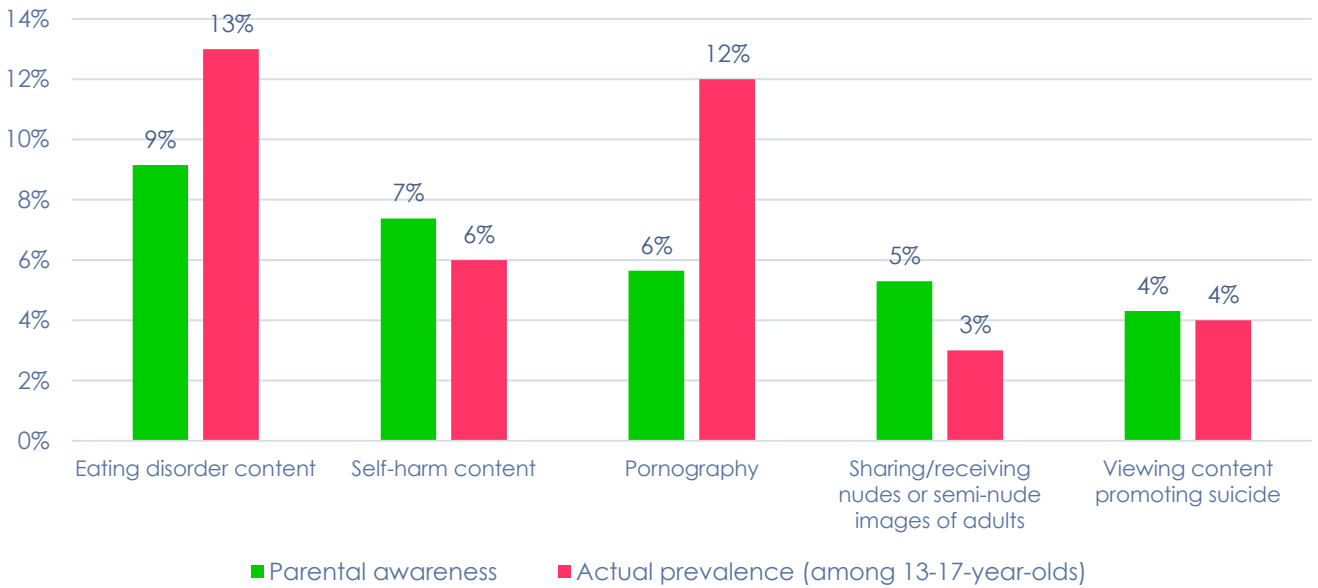


Figure 4 – Parents’ awareness of their child’s exposure to PPC (n=2,000), compared to actual exposure levels among 13-17-year-olds (n=556), nationally representative sample, May 2024.

**(2) Parental awareness of children’s exposure to PC**

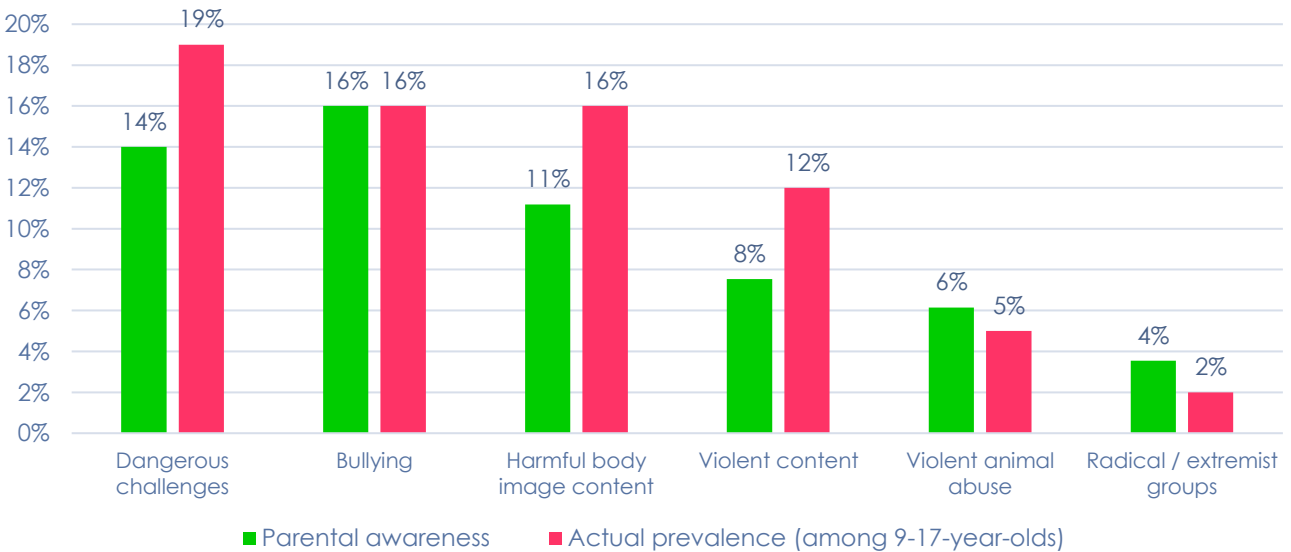


Figure 5 - Parents’ awareness of their child’s exposure to PC (n=2,000), compared to actual exposure levels among 9-17-year-olds (n=1,000), nationally representative sample, May 2024.

### The impact of PPC and PC on children

Our Tracker Survey also asks children to rate the effect that online harms had on them on a scale of 1 to 7, where 1 is no impact and 7 is a significant impact.

As Figures 6 and 7 demonstrate, forms of PPC and PC have an impact on children who experience them. The harms which have the greatest impact on children are exposure to pro-suicide content, bullying and viewing violent animal abuse, followed by sending/receiving nude images of adults and exposure to self-harm content.

#### (1) The impact of PPC on children

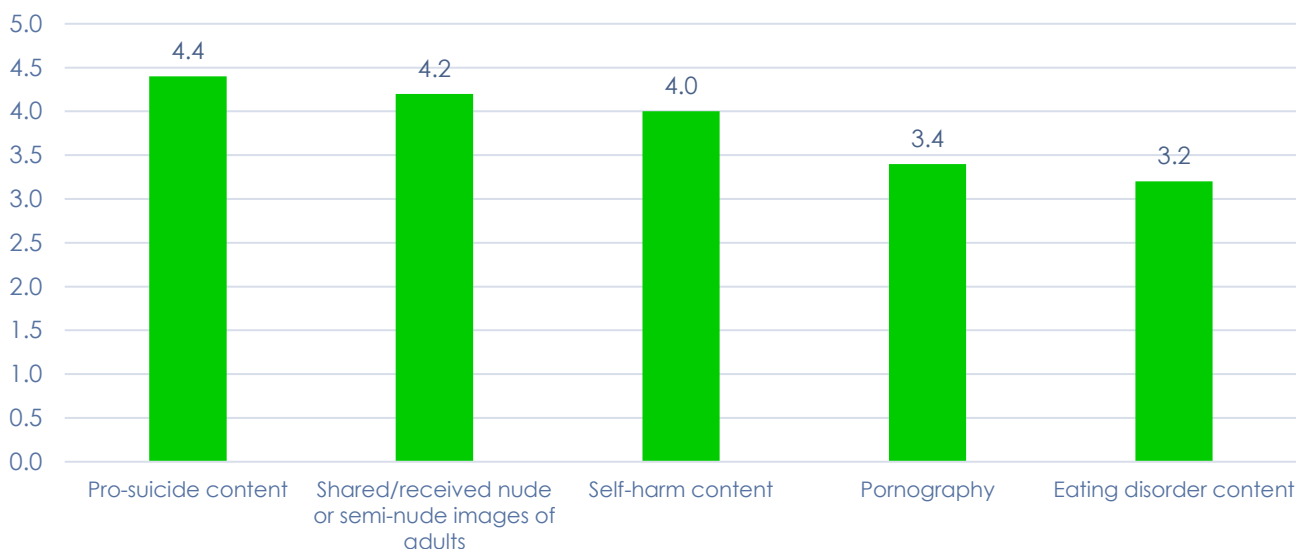


Figure 6 - Self-reported impact of PPC, nationally representative sample of children aged 13-17, May 2024

#### (2) The impact of PC on children

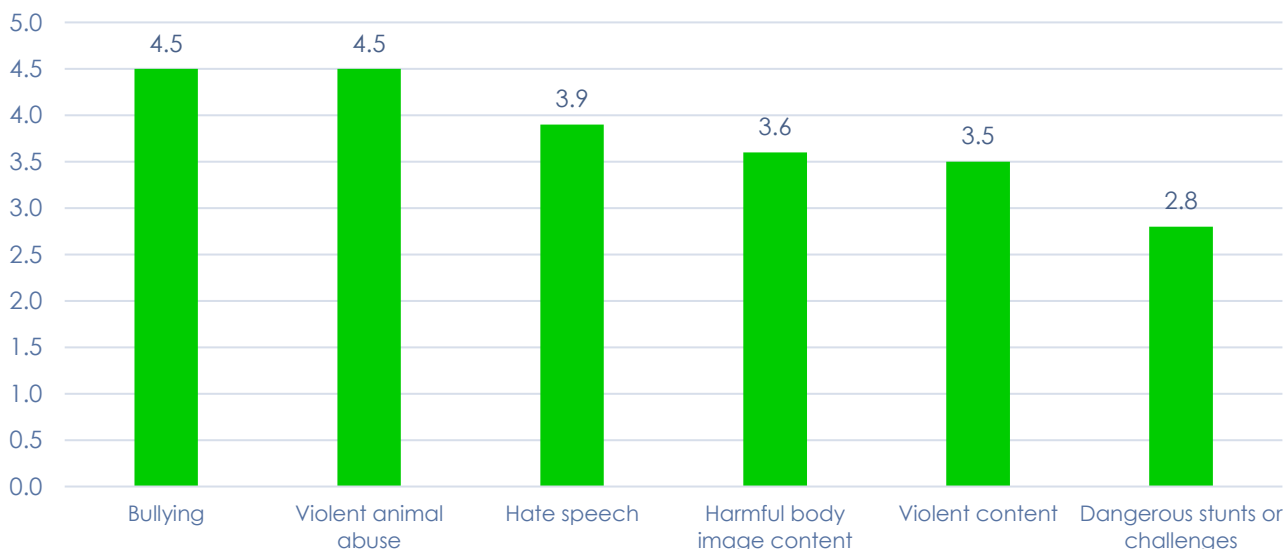


Figure 7 - Self-reported impact of PPC, nationally representative sample of children aged 13-17, May 2024

## The experience of vulnerable children

Internet Matters' research consistently indicates that children with vulnerable 'offline' circumstances – for example, children in social care, with special educational needs (SEN) or disabilities, and children with mental health needs – are more likely to experience harms in the online world.<sup>8</sup>

To understand this in more depth, our regular tracking survey contains a subset of vulnerable children who – for the purposes of the survey – we define as children:

- Who receive special education needs (SEN) support and/or,
- Who have an Education, Health and Care Plan (EHCP), indicating a significant level of SEND, and/or,
- Who have a mental or physical health need which requires professional support.

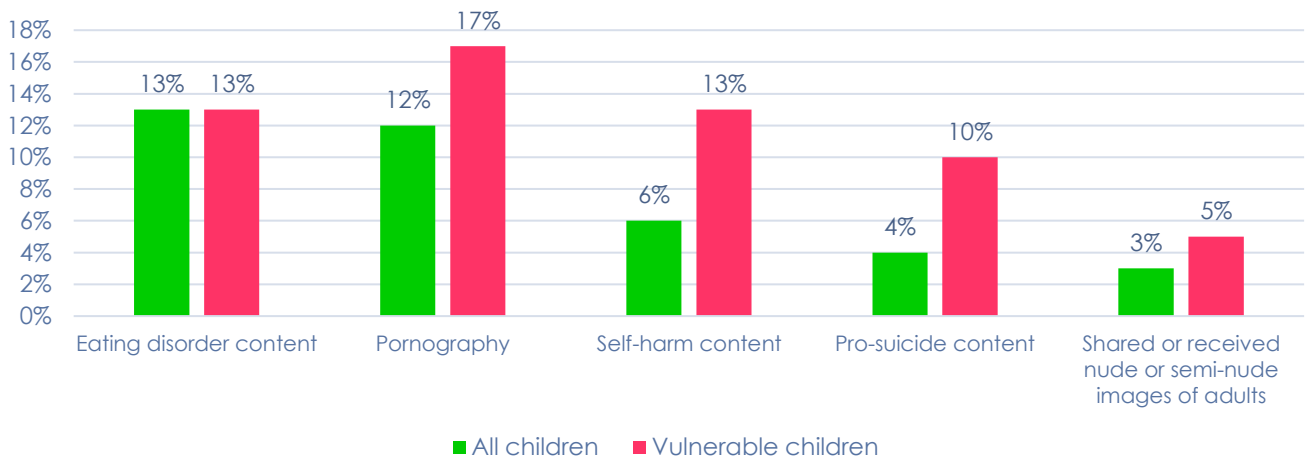


Figure 8 - Exposure to PPC by vulnerability, children aged 9-17, May 2024

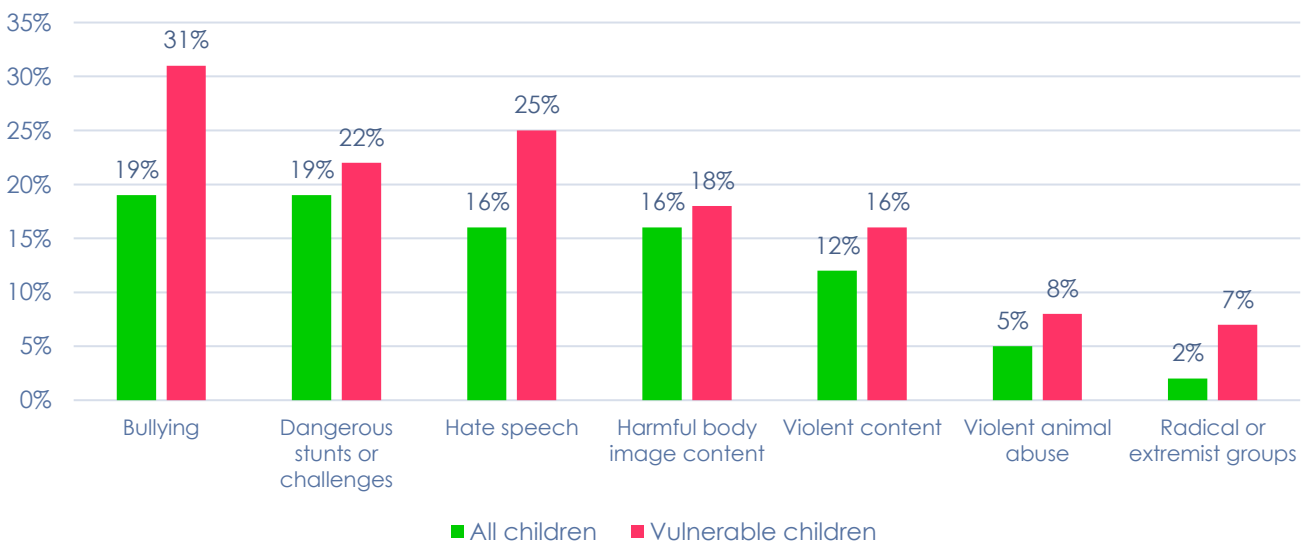


Figure 9 - Exposure to PC by vulnerability, children aged 9-17, May 2024

<sup>8</sup> Internet Matters, 2021, *Refuge and Risk: Life online for vulnerable children*, [link](#).



## Volume 5 – What should services do to mitigate the risk of online harms – Our proposals for the Children’s Safety Codes (Section 13)

### Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?

*Not confidential*

#### **Parental tools and controls**

We come from the fundamental starting point that children’s safety online is a responsibility shared between technology companies, regulation, parents and services who support families – primarily schools. For too long, the heaviest burden has rested on parents, and to an extent on teachers, to keep children safe online. Ofcom’s regulation of online services should go a long way to correct this balance – requiring platforms to recognise the risks to children on their services and to build safety into their products by design.

But even in the context of a fully functioning online safety regime, technology companies cannot and will not have wholesale responsibility for keeping children safe online. **Children exist within families – and for online safety regulation to have real-world value, it should be delivered in ways which are practical and reflective of most children’s every-day experiences.** We think that it is a significant risk to children’s safety if the role of parents is not acknowledged by Ofcom’s regime in a meaningful way.

Parents are a key protective force in children’s online lives. **The overwhelming majority of children (84%) learn how to stay safe online by speaking to a parent.**

Among children who have experienced a harm online, the greatest proportion spoke to a parent (45%) and/or asked a parent take action on the device (30%).

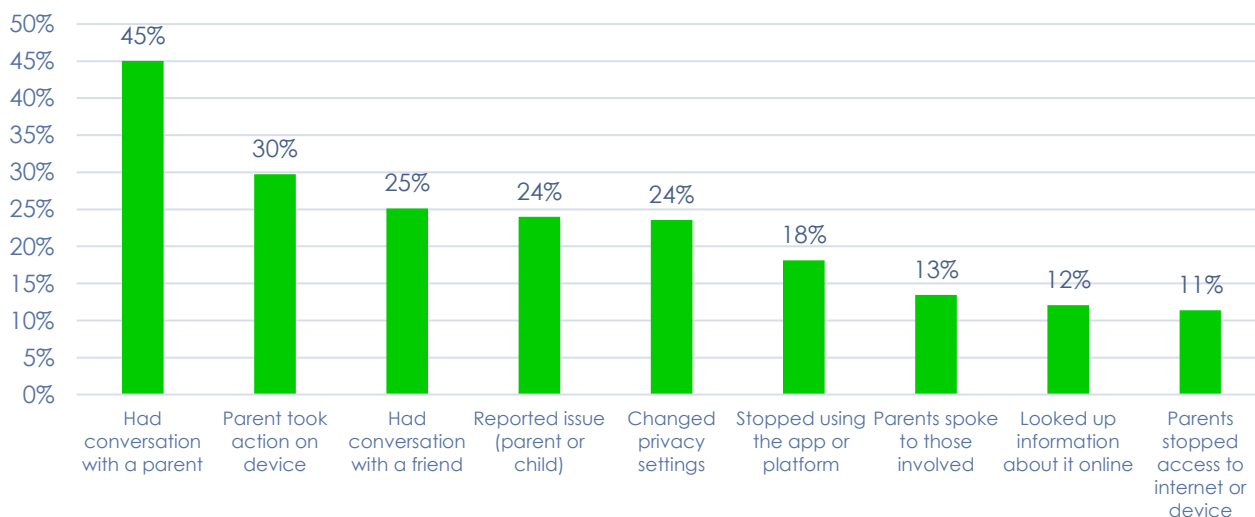


Figure 10 - Actions taken by children aged 9-17 in response to an online harm, May 2024

Parental tools and controls are a key means by which parents can supervise their children’s safe use of online service, blocking access to harmful content, limiting who can communicate with their child, and setting time limits on devices.

It is disappointing that Ofcom have decided not to recommend use of parental controls in the draft Code, citing limited evidence about the effectiveness and uptake of these tools. Despite the key protective factor that parental controls can play in children’s online experiences, our most recent tracking data indicates that:

- **A significant proportion (15%) of parents do not employ any form of parental control** (e.g. safe search, privacy or screentime controls).
- **The majority (81%) of parents do not employ parental controls on social media** (e.g. family centre and family pairing functions).
- **By far the most common reason given for not employing a parental control is ‘I don’t feel like I need them’** (stated by 63% of parents who use no parental control), suggesting that more is needed to communicate the importance of parental controls in creating safe and appropriate experiences for children.

Our qualitative research with parents on attitudes to smartphone and social media use finds that parents see value in parental controls but there are challenges around accessibility:<sup>9</sup>

*“Sky has parental control, so it pops up when you’re starting your internet package, they tell you all the features. It tells you that you can have your parental controls on then as well. ... but I don’t think a lot of people actually put them in place.”* – Parent, Internet Matters focus group, June 2024

Parents noted that they would rather manage online risks with parental controls than advocate for an all-out ban of social media for children:

*“Easy-to-use parental controls would be more realistic than a ban. I just don’t like... The word ‘ban’ as well just seems... Yes, it seems a little bit dictatorial, doesn’t it?”* – Parent, Internet Matters focus group, June 2024

Parents of teenagers raised particular issues with employing parental controls, despite the fact that when they are used they are seen as valuable:

*“I think ... teenagers will find a way around [parental controls] ... I’m at a point now where I’ve lost control of what they do on their phones. They could lie to me and run rings round me because I wouldn’t understand a lot of the apps and what they’re capable of and what they’re actually doing on them.”* – Parent, Internet Matters focus group, June 2024

### Implications for the draft Code of Practice

- Many larger platforms offer parental controls, but some do not. **Ofcom should standardise the availability of parental controls on platforms by making this a requirement of all U2U services which are either large or multi-risk.**
- **Ofcom should also require large and multi-risk U2U services to make parental controls more accessible**, alongside clear information for parents about why they are important.
- There should be more readily available information on the importance of employing parental controls to protect children from harmful content. **Ofcom should play a role in communicating with families about the central importance of parental controls in ensuring safer online experiences.**

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<sup>9</sup> Internet Matters, 2024, Research into parents’ and children’s attitudes to smartphone and social media use, publication forthcoming.

## Age assurance measures (Section 15)

**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.**

*Not confidential*

Age assurance is an important starting point to unlock the effectiveness of many provisions in the Protection of Children Code. There is strong demand from children, parents and teachers for online companies to provide more age-appropriate experiences, rather than simply blocking children's access to the online world altogether.

### **(1) Age assurance is critical to providing age-appropriate digital services**

It is disappointing that Ofcom has decided to recommend a narrow model for age assurance, arguing that less precise forms of age assurance (e.g. age estimation technologies)<sup>10</sup> aren't sufficiently developed to distinguish children of different ages.<sup>11</sup> As a result, the draft Code limits the application of age assurance to prove that a user is over 18, rather than suggesting tailored measures for children in different age groups. This approach does not align with the ICO's Age Appropriate Design Code which requires services to consider children's evolving capacities and ensure that features are appropriate for their developmental needs.<sup>12</sup>

This approach is also at odds with Ofcom's own research into child development and online behaviour,<sup>13</sup> and with the intention of the Online Safety Act, which states that platforms must take action to "*manage and mitigate the risks of harm to children in different age groups*"<sup>14</sup>

It is well understood that children's capacities and needs evolve at different points in development, and so do the risks and opportunities presented by their interactions online.<sup>15</sup> Specific features of online platforms are likely to impact children at different stages of childhood, yet nuances are rarely reflected in the design of digital services.

**We feel that this is a missed opportunity for Ofcom to drive the development of age-appropriate online services** – e.g. targeting specific protections and measures to children of different age groups. Rather than viewing age assurance as a tool to restrict access – **we recommend that Ofcom reconsiders its approach, accounting for the role of age estimation tools to grant children of different age groups more freedom to explore and engage with appropriate content and features.**

We strongly recommend that Ofcom reconsiders its approach to age assurance, with a view to tailoring measures for children in different age groups, following a review of evidence provided by the sector.

### **(2) Age assurance must play a role in enforcing minimum age requirements**

The ongoing debate around children's access to social media and smartphones has largely centred around the lack of robust age gating mechanisms on major platforms. Despite the minimum age requirement for most social media platforms being 13, the reality is that many children under 13 are able to bypass restrictions with relative ease. In the absence of enforced minimum age requirements (per terms of service), a growing number of parents are calling to restrict children's access to social media altogether.<sup>16</sup>

Our own research into children's use of online platforms supports Ofcom's findings<sup>17</sup> that underage use of social media is widespread. Our most recent (May 2024) Tracker Survey found that significant numbers of children are using platforms below the minimum age requirement.

- Half (50%) of children aged 9-12 use WhatsApp,
- A third (32%) of children aged 9-12 use TikTok

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<sup>10</sup> Yoti, December 2023, *Yoti Facial Age Estimation White Paper*, [link](#).

<sup>11</sup> Ofcom, 2024, *Protecting children from harms online*, Volume 5 15.318

<sup>12</sup> ICO, 2020, *Age appropriate design: a code of practice for online services*, [link](#).

<sup>13</sup> Ofcom, 2024, *Child development ages, stages and online behaviour: Overview of research and evidence*, [link](#).

<sup>14</sup> Online Safety Act (2023) Section 12 (2)(b)

<sup>15</sup> 5Rights, 2023, *Digital Childhood: Addressing childhood development milestones in the digital environment*, [link](#).

<sup>16</sup> The Guardian, February 2024, 'Thousands join UK parents calling for smartphone-free childhood', [link](#).

<sup>17</sup> Ofcom, 2024, 'A third of children have false social media age of 18+', [link](#).

- A further 22% of 9-12-year-olds use Snapchat and 15% use Instagram.

This is despite the fact that a majority of both children and parents think that major social media platforms should not be accessible to under-13s.<sup>18</sup>

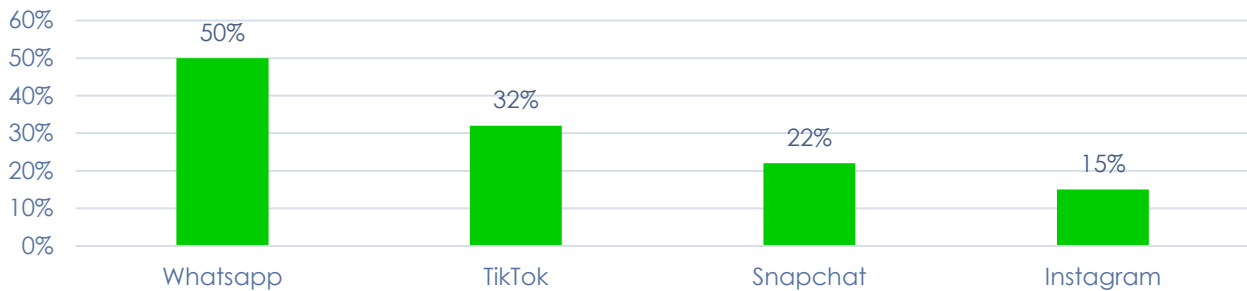


Figure 11 – Underage use of platforms by children aged 9-12 (n=444), May 2024

This is a challenge that Ofcom must address through the Protection of Children Code.

Ofcom states that it is exercising caution around recommending use of technology which is relatively ‘nascent’ in its development. However, the narrow approach taken may risk stifling development in this growing area, and Ofcom risks missing an opportunity to shape the direction and development of this evolving technology.<sup>19</sup>

#### Implications for the draft Code of Practice

**We recommend that Ofcom requires companies to utilise age estimation technology to enforce minimum age requirements**, with alternative routes for sign-up (e.g. parental vouching or other identifiers) for children above the minimum age requirement who do not pass the initial barrier to sign up.

<sup>18</sup> Internet Matters, 2024, Research into smartphone and social media use among parents, publication forthcoming.

<sup>19</sup> Yoti, December 2023, Yoti Facial Age Estimation White Paper, [link](#).

## User reporting and complaints (Section 18)

### 43. Do you agree with the proposed user reporting measures to be included in the draft Children’s Safety Codes?

*Not confidential*

Note that a section of this response relates to our response to the *Illegal Harms Consultation Q.16*,<sup>20</sup> regarding child-on-child abuse and the need for specific reporting measures to address child-perpetrated harm.

User reporting and complaints systems are a crucial aspect of efforts to tackle harm online. It is welcome to see the focus on robust user reporting and complaints in the draft Code of Practice, however there are a number of ways in which we propose that these duties are strengthened.

#### Current levels of user reporting

Many children who experience harm online do not report issues to the platform. In our most recent Digital Tracker survey, we find that **just 24% of children who had experienced a harm online reported it to the platform where the issue happened** – either themselves or with the help of a parent / caregiver.

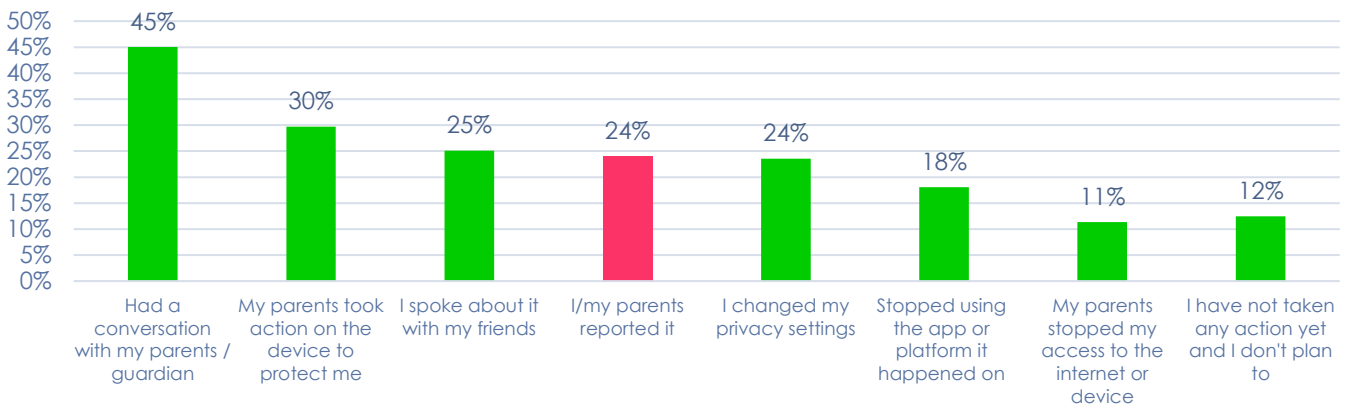


Figure 12 - Actions taken by children who have experienced an online harm n=713, children aged 9-17, May 2024

Among children who experienced a harm and reported it to the platform, over half (56%) asked a parent to report the issue and around a third (36%) reported the issue directly to the app or platform where the issue happened themselves.

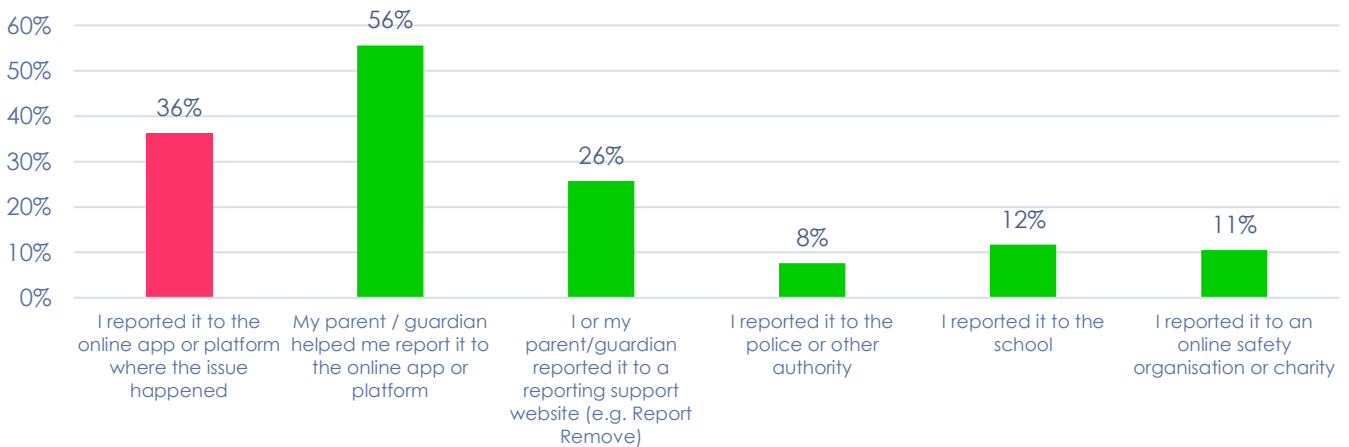


Figure 13 - Methods of reporting, among children who have reported an online harm n=171, children aged 9-17, May 2024

<sup>20</sup> See Internet Matters, 2024, Response to Illegal Harms Consultation, [link](#).

## Barriers to reporting

Overall, **among children who have experienced an online harm, just 8% reported the issue directly to the platform themselves.** Children are far more likely to seek help offline, choosing to speak to a parent or friend. The reasons behind this are varied and complex, and include:

- Young people often tell us that they lack trust in platform reporting tools in being able to effectively resolve issues.
- Some children are concerned about the repercussions of reporting on their social and school life.
- Additionally, children may not view harmful online experiences as a ‘big deal’. In a recent deep-dive study into girls’ experiences of online harm from our annual Digital Wellbeing Index,<sup>21</sup> we find that some girls ‘can’t be bothered’ to report unwanted communication from men – because it happens so frequently.

Each of these issues must be addressed by service providers. User reporting systems must be transparent, reliable and identity-protecting. To re-build children’s trust in user reporting, and to reflect their heightened vulnerability online compared to adult users, children’s reports and complaints should be prioritised for human review. Above this, children should be provided with clear and consistent information about the kinds of content and behaviour which warrant reporting, including how this information can be used by the platform to safeguard and protect other users.

## Implications for the draft Code of Practice

Data from our Digital Tracker survey underscores current challenges to children reporting harmful online experiences. We support proposed measures UR1-5 requiring U2U and search services likely to be access by children to provide easy to access, transparent and responsive complaints systems.

To strengthen existing proposals for user reporting, we suggest that:

- **Platforms should provide and promote information to children about content and behaviour that should be reported**, including information about action that will be taken to address it.
- **Platforms should ensure that written information about the reporting process is comprehensible based on the likely reading age of the youngest person permitted to agree to the service’s terms of use.**
- **User reports made by children should be prioritised for human review.**

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<sup>21</sup> Internet Matters, 2024, “So standard it’s not noteworthy” – Teenage girls’ experiences of harm online, [link](#).

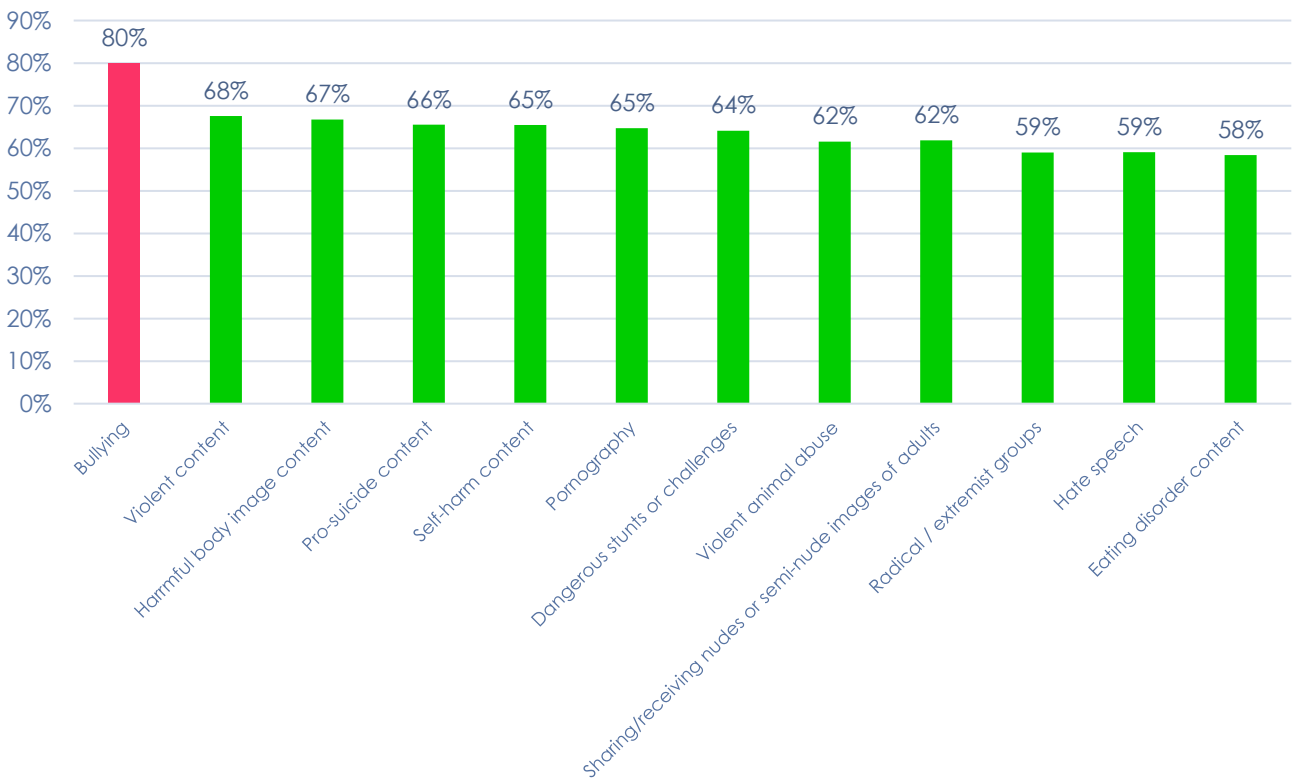
**Child-on-child harm**

As discussed in Internet Matters’ response to IHC Q.16, child-on-child sexual abuse is a considerable issue that can leave profound and lasting impacts on victims. Child-on-child harm that doesn’t meet the threshold for illegality, such as bullying and harassment, can also have a devastating impact on victims and their families. While physical bullying can be more easily recognised by teachers, online bullying and harassment outside school hours can be more challenging for schools to identify and address.

For this reason, it is critical that platforms play their part in protecting children from child-perpetrated harm – with the provision of bespoke reporting routes for this behaviour.

**Scale and impact of online bullying**

For both parents and children, bullying is consistently the top-of-mind concern about being online.



**Online bullying is experienced by around 1-in-6 children (16%),** with the highest incidence level among children aged 11-12.

Vulnerable children<sup>22</sup> are significantly more likely to be victim to online bullying than non-vulnerable peers. Over a quarter of vulnerable children (26%) have experienced bullying, compared to 14% of all children.



Figure 14 - Prevalence of bullying by vulnerability, children aged 9-17 (n=1,000), May 2024.

<sup>22</sup> Defined as children with a Special Educational Need (SEN), Education, Health and Care Plan (EHCP), physical or mental health need.

**Online bullying is also the most impactful form of PPC/PC experienced by children**, 16% of children who have experienced online bullying describe it as causing ‘serious distress, upset or harm’.

### **Implications for the draft Protection of Children Code of Practice**

Given the prevalence and significant impact of online bullying, we think that it is important for Ofcom to consider a targeted approach to address this issue – which goes above and beyond proposed measures to tackle a broader range of harms.

Measures to assist reporting of child-on-child harm, including bullying and harassment, should align with a differentiated approach to child-on-child sexual abuse. I.e. child-on-child reporting measures should provide that all children involved are safeguarded (victim(s), perpetrator(s) and witness(es) – noting the limitations of this language when applied to child-on-child incidents).

User reporting measures to tackle child-on-child harm may include:

- **Mandatory peer-reporting tools on children’s accounts** should be provided, enabling children to safely and confidently alert the platform to child-perpetrated bullying and harassment. This should be accompanied with clear information for children and parents on how these tools operate – including that they will remain anonymous to peers following a report.
- **Reporting mechanisms for non-users such as parents and teachers**, alongside greater information and advice on identifying the signs of online bullying and harassment, and how non-user reports and complaints about child-on-child harm will be handled.
- **Preventative safety tools for children**, such as prevention messages and advice about online bullying and harassment.



## Additional comments: Media literacy and outreach to families

### (1) Media literacy

As outlined throughout this consultation response, parents are the key protective force in most children's online lives. But many parents find keeping their child safe online desperately hard as new technologies and risks continue to emerge. Internet Matters has been a long-term advocate for online safety regulation. Regulation based on safety-by-design principles should create less reliance on children (and those who support them) to keep themselves safe.

But, even in the context of high-quality regulation, services will not have the ability to mitigate online risks wholesale. **There will continue to be a role for high-quality media literacy skills to support children and parents to safely navigate online life.**

As we set out in our response to Ofcom's three-year media literacy strategy consultation,<sup>23</sup> we feel that more should be done to develop a coherent read-across between Ofcom's media literacy duties and its new powers under the Online Safety Act. **We encourage Ofcom to draw the explicit linkages between media literacy and the online safety Codes, with a clear framework setting out how the two strands of work cohere.**

In particular, we suggest that Ofcom works to ensure that media literacy research builds on online safety policy development, and vice versa. And while part of the Media Literacy Team's work is about articulating best practice, this should become what we expect as standard across all platforms – and therefore mandated under the Online Safety Act regime.

### (2) Outreach to families

There is strong demand from children and parents for tech companies to provide safer and more age-appropriate experiences, rather than the alternative response – where children are blocked from accessing the online world altogether.<sup>24</sup>

However, as outlined in previous consultation submissions,<sup>25</sup> it is our general observation that little, so far, has been done to ensure that children and parents are informed about Ofcom's regulation – and what it will mean for them.

**A wider piece of work is needed to communicate with families about the importance of the online safety regime.** This should include information about what the regime *will* and *won't* be able to achieve, the continued role that parents will play, as well as likely timescales for tangible improvements to online safety.

### (3) The ongoing role of schools and the third sector

Schools will be an effective vehicle for addressing both challenges, as a stable and trusted institution in the lives of most families across the country.

As we set out on our 'Vision for Media Literacy'<sup>26</sup> and our response to the three-year media literacy strategy consultation,<sup>27</sup> we suggest that **Ofcom considers how to harness the school network to promote awareness of both media literacy and online safety regulation.** This will involve working closer with the Department for Education, as well as DSIT, to ensure a coherent approach that encompasses both the curriculum and out-of-school provision.

The third sector will also continue to play an important role in providing media literacy support and resources. But there remains a question about the ongoing sustainability of the media literacy sector, particularly as more funding is diverted to levies to fund online safety regulation in the UK and worldwide. **Ofcom must stay ahead of this challenge by considering how it will support the third sector within the future funding landscape.**

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<sup>23</sup> Internet Matters, 2024, Response to consultation on Ofcom's Three-Year Media Literacy Strategy, [link](#).

<sup>24</sup> Internet Matters, 2024, Research into parents' and children's attitudes to smartphone and social media use, publication forthcoming.

<sup>25</sup> Internet Matters, 2024, Response to consultation on Ofcom's draft age assurance and other Part 5 duties, [link](#).

<sup>26</sup> Ofcom, 2024, *A Positive Vision for Media Literacy: A consultation on Ofcom's Three-Year Media Literacy Strategy*, [link](#).

<sup>27</sup> Internet Matters, 2024, Response to consultation on Ofcom's Three-Year Media Literacy Strategy, [link](#).