Consultation response form

Please complete this form in full and return to protectingchildren@ofcom.org.uk.

Consultation title	Consultation: Protecting children from harms online
Organisation name	Parenting Focus

Question	Your response
Volume 2: Identifying the services children are using **Children's Access Assessments (Section 4).**	
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. 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? 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? 3. Our proposed approach to the process for children's access assessments?	1. While we appreciate the intention behind Ofcom's 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, we have significant concerns regarding the stringency and implementation of these measures. **Lack of Robust Age Assurance** The proposed measures may not be stringent enough to ensure that age assurance mechanisms are truly effective. The efficacy of age verification technologies can vary, and without stringent standards and regular auditing, it is possible for children to circumvent these measures. Research indicates that many existing age verification methods, such as self-declaration and easily bypassed digital barriers, are insufficient to reliably prevent children from accessing inappropriate content. **Absence of Processes for Removing Identified Underage Users** Another critical gap in the current proposals is the absence of a clear process for removing children who are identified as underage after they have accessed a service. It is essential to have a systematic approach to not only identify underage users but also to remove and prevent them from re-accessing the service. This would involve: 1. Immediate suspension of accounts found to be underage. 2. Clear procedures for verifying age upon re-registration attempts. 3. Regular monitoring to ensure compliance with age restrictions. **Evidence and Best Practices** Evidence from child safety advocates and studies on online harms shows that a multi-layered approach to age assurance, combining technological and human oversight, tends to be more effective. This includes the use of AI-driven verification methods, enhanced moderation, and mandatory reporting protocols for suspicious accounts. **Recommendations**

Question	Your response
	To enhance the effectiveness of the proposed measures, we recommend the following: 1. **Implementing Stringent Age Verification Standards:** Ofcom should specify robust standards for age assurance technologies, including biometric verification and AI-based systems, which have proven more effective than simple self-declaration methods. 2. **Regular Audits and Penalties:** Introducing regular, independent audits of age verification processes and imposing substantial penalties for non-compliance can ensure that service providers take these measures seriously. 3. **Clear Removal Protocols:** Developing and enforcing clear protocols for the immediate removal of identified underage users and preventing their re-access to the service. 4. **Transparency and Accountability:** Requiring platforms to publicly report on their age verification processes and the effectiveness of these measures can help build trust and ensure continuous improvement. In conclusion, while the proposal for highly effective age assurance is a step in the right direction, it needs to be backed by stringent enforcement and clear protocols for managing underage users to truly safeguard children online. **2.** Parenting Focus acknowledges Ofcom's efforts in proposing an approach to the child user condition, specifically the interpretation of "significant number of users who are children." However, we have several concerns regarding the sufficiency of the emphasis placed on services' appeal to children, their advertising strategies, and the impact of changing trends. **Appeal of Services to Children** Many online services and platforms inherently appeal to children through their content, design, and features. Factors such as bright colours, gamification elements, and interactive features are attractive to younger audiences. Despite a service not being explicitly targeted at children, these elements can still draw significant numbers of child users. Therefore, it's crucial that the interpretation of "significant number of users who are children" includes an assessment of these design aspects and their potential to attract young audiences. **Advertising Strategies**

Question	Your response
	The way services are advertised plays a significant role in attracting child users. Advertisements that are displayed during children's programming, on websites frequently visited by children, or through influencers popular among younger demographics, can significantly increase the number of child users on a platform. Current proposals may not sufficiently account for the influence of targeted advertising strategies in attracting children to services not explicitly designed for them. **Changing Trends** Online trends can shift rapidly, and services not initially popular among children can suddenly become trendy and attract a significant child user base. For example, social media platforms, initially targeting older audiences, often become popular among younger users due to viral trends or endorsements by child influencers. The proposed approach needs to be flexible enough to account for such dynamic changes and ensure ongoing assessment rather than a one-time evaluation. **Recommendations** 1. **Holistic Assessment Criteria**: Include comprehensive criteria that assess the appeal of a service's design, features, and content to children. This should consider visual elements, gamification, interactive features, and overall user experience. 2. **Advertising and Marketing Evaluation**: Require service providers to consider their advertising and marketing strategies, including where and how they promote their services. Ads targeted at child-centric media should trigger a review of the service under the child user condition. 3. **Dynamic Monitoring and Reassessment**: Implement mechanisms for ongoing monitoring and reassessment of services to account for changing trends and sudden shifts in user demographics. This can be achieved through periodic reviews and requiring platforms to report significant changes in their user base. 4. **Transparency and Reporting**: Encourage transparency by having service providers publish regular reports on their user demographics, advertising practices, and any changes in their child user

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	base. This will help Ofcom and other stakeholders monitor compliance and adjust regulations as needed. **Conclusion** While Ofcom's proposed approach to the child user condition is a solid foundation, it requires further emphasis on the appeal of services, advertising strategies, and the dynamic nature of online trends. By incorporating these considerations, the regulatory framework can better ensure the safety of children online.

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

Draft Children's Register of Risk (Section 7)

Question	Your response
Proposed approach: 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. a. Do you think we have missed anything important in our analysis? 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.	4. Parenting Focus agrees with Ofcom's identified categories of online harms, acknowledging that it is crucial to address a broad spectrum of risks to protect children effectively. The categories currently outlined—ranging from exposure to inappropriate content, cyberbullying, and exploitation to privacy breaches—are all significant and warrant comprehensive regulatory attention. It is challenging to prioritise one over another since each type of harm can have profound and lasting effects on children's well-being. **Unexpected Harmful Content** However, we believe there is a crucial omission in the current assessment: the category for unexpected harmful content. This category would address emerging and unforeseen online phenomena that pose significant risks to children, which do not neatly fit into existing categories. Examples include: 1. **Phenomena like 'Huggy Wuggy'**: Recently, content related to 'Huggy Wuggy', a character from a horror-themed video game, appeared on platforms such as YouTube. The character, though initially intended for a mature audience, was presented in a way that was accessible to children, leading to widespread concern among parents and educators due to its frightening and inappropriate nature 2. **Inappropriate Content Disguised as Child-Friendly**: Another critical issue is the presence of inappropriate or harmful content disguised as child-friendly. There have been numerous reports of videos on platforms like YouTube Kids featur-

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	ing beloved characters engaging in violent, sexual, or otherwise disturbing behaviour. These videos often evade content filters and algorithms designed to protect children.

Impact of Unexpected Harmful Content

The impact of such content can be severe, including psychological trauma, fear, anxiety, and behavioural changes in children. These forms of harm are particularly insidious because they often catch parents and guardians off-guard, making it difficult to shield children effectively.

Recommendations for Addressing Unexpected Harmful Content

To address these concerns, we recommend the following:

1. **Dynamic and Flexible Monitoring Systems**: Implementing more dynamic content monitoring and detection systems that can quickly adapt to and identify new types of harmful content. This could involve advanced AI and machine learning tools designed to recognise and flag emerging threats in real-time.

2. **Parental Controls and Reporting Mechanisms**: Enhancing parental control features and reporting mechanisms to allow for rapid response to new harmful content. Platforms should make it easier for parents and users to report inappropriate content, which should then be swiftly reviewed and addressed.

3. **Regular Updates and Reviews**: Ofcom should conduct regular reviews of online content and trends to identify new forms of harmful content promptly. This ongoing review process can help ensure that regulations remain relevant and effective in the face of rapidly changing online environments.

4. **Educational Initiatives**: Launching and supporting educational initiatives for parents and children to raise awareness about the potential for unexpected harmful content and strategies for safe online navigation.

While Ofcom's current assessment of online harms is thorough, the addition of a category for 'unexpected harmful content' is necessary to cover emerging threats that do not fall under traditional categories. By adopting these recommendations, Ofcom can create |

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	a more comprehensive and adaptive framework for protecting children online.

6.In responding to this aspect of Ofcom's consultation, we would like to express our agreement with these age groupings as they appropriately reflect the distinct developmental stages and corresponding risk profiles of children. However, we feel it's crucial to emphasise that the proposed measures may still fall short in adequately protecting these age groups.

Our primary concerns are:

1. **Effectiveness of Age Assurance**: The current proposals might not ensure sufficiently stringent age assurance mechanisms. Given the sophisticated ways children can bypass age restrictions, we recommend more robust and verifiable methods of age verification to prevent underage access.

2. **Lack of Removal Mechanisms**: There is a notable absence of guidelines or mechanisms for promptly removing children identified as underage from platforms. Implementing clear procedures for this is critical to maintaining a safe online environment.

3. **Appeal and Advertising**: There should be greater emphasis on the appeal of services to children, how these services are marketed, and how trends may temporarily increase their attractiveness to younger users. This could significantly impact the efficacy of risk assessments and protective measures.

We hope Ofcom considers these additional factors and strengthens its guidance to better safeguard children online.

7. Ofcom's broad interpretation of non-designated content ensures that a wide range of potentially harmful materials can be reviewed and addressed, even if they don't fall into pre-defined categories. This is crucial for capturing emerging risks that haven't been formally recognised yet. There may be challenges in consistently identifying such content without clear guidelines or criteria, potentially leading to subjective or inconsistent enforcement.

Proactive efforts to identify non-designated content reflect a forward-thinking approach to online safety. This could help in catching harmful trends early, such

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	as viral challenges or new types of inappropriate content. However, the effectiveness of this approach depends heavily on the resources and tools available to Ofcom for monitoring vast amounts of online content. Additionally, it requires robust cooperation from platform providers.

Parenting Focus agrees that utilising an evidence-based framework to identify and assess non-designated content ensures that actions are grounded in real-world impacts and data. This can help in making informed decisions about what content should be regulated more strictly. Gathering sufficient and timely evidence can be resource intensive. Despite this, evolving online environments may outpace the ability to collect and analyse relevant data effectively.

Recommendations

1. **Clearer Guidelines and Criteria**

   o Developing more precise guidelines and criteria for what constitutes non-designated harmful content can aid in more consistent and objective identification. This could include parameters based on content themes, user behaviour analytics, and historical data of harmful incidents.

2. **Enhanced Monitoring Technologies**

   o Investing in advanced AI and machine learning technologies to better identify and flag non-designated harmful content. These tools can analyse patterns and detect anomalies that human moderators might miss.

3. **Collaboration with Platforms and Experts**

   o Strengthening partnerships with online platforms, child safety organisations, and academic researchers can enhance the understanding and identification of emerging harmful content. Collaborative efforts can lead to more comprehensive and timely responses.

4. **Dynamic and Flexible Regulation**

   o Implementing a regulatory framework that is dynamic and adaptable to new findings and technological advancements. Regular updates and revisions to guidelines based on ongoing research and stakeholder feedback can ensure continued relevance and effectiveness.

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	Conclusion
	While Ofcom's interpretation and approach to identifying non-designated content are commendable for their inclusivity and proactive stance, there are areas where clarity and enhancement are needed. By adopting more precise guidelines, leveraging advanced technologies, and fostering collaborative efforts, Ofcom can more effectively manage the complexities of online content and better protect children from emerging threats.
Evidence gathering for future work:	**9**. Generative AI (GenAI) technologies, including chatbots and content creation tools, are becoming increasingly integrated into user-to-user (U2U) platforms and search services. While these technologies offer numerous benefits, they also pose several risks to children. Here are the primary concerns:
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)?	**1. Exposure to Inappropriate Content**
	Generative AI can inadvertently create or amplify inappropriate content. For instance, AI-driven chatbots or content generators can produce text, images, or videos that are not suitable for children, including violent, sexual, or otherwise harmful material. Since these tools learn from large datasets, they may replicate biases and inappropriate content found within these datasets.
9. Have you identified risks to children from GenAI content or applications on U2U or Search services?	**2. Misinformation and Deception**
	Children are particularly vulnerable to misinformation generated by AI. Generative AI can create realistic but false information, which children may struggle to differentiate from factual content. This can lead to the spread of harmful myths, incorrect information, or even dangerous advice.
a) Please Provide any information about any risks identified	**3. Privacy and Data Security**
	Generative AI applications often require significant amounts of data to function effectively. When children interact with these tools, they may inadvertently share personal information, which can be collected and misused. This raises concerns about privacy and data security, especially since children might not fully understand the implications of sharing their data online.
	4. Predatory Interactions
	AI-driven U2U platforms can be exploited by predators who use these technologies to groom or exploit children. Predators can leverage AI tools to create

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	convincing fake identities, engage in deceptive conversations, or manipulate children into sharing sensitive information or meeting in person.

5. Psychological Impact

The immersive and interactive nature of AI-generated content can have psychological impacts on children. Continuous exposure to AI-generated content that is violent, stressful, or otherwise emotionally taxing can affect a child's mental health, leading to anxiety, fear, or desensitisation to real-world violence.

6. Addiction and Overuse

AI tools, particularly those designed to be highly engaging and interactive, can lead to addictive behaviours. Children may spend excessive amounts of time interacting with AI-driven applications, leading to negative impacts on their social development, physical health, and academic performance.

Recommendations

1. **Robust Content Moderation**: Implementing stringent content moderation systems to filter and block inappropriate AI-generated content is crucial. This includes using advanced algorithms and human oversight to review AI outputs.

2. **Parental Controls and Education**: Developing effective parental control tools that allow parents to monitor and regulate their children's interactions with AI applications. Additionally, educating parents and children about the risks and safe use of AI technologies is essential.

3. **Privacy Safeguards**: Ensuring AI applications adhere to strict data privacy regulations, such as GDPR, and implementing strong security measures to protect children's data.

4. **Regular Audits and Updates**: Conducting regular audits of AI systems to identify and mitigate potential risks. AI technologies should be regularly updated to address new threats and improve safety features.

5. **Research and Collaboration**: Encouraging ongoing research into the impacts of AI on children and fostering collaboration between tech companies, policymakers, and child safety organisations to develop and enforce effective safety standards.

By addressing these concerns through effective policies and proactive measures, we can better protect

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	children from the potential harms associated with Generative AI on U2U and search services.
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: a) (i) specific examples of body image or depressive content linked to significant harms to children, b. (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.	**10.** Parenting Focus acknowledges the significant concerns related to body image and depressive content online, which, while not always classified as priority or primary priority content, can have substantial harmful effects on children. Based on feedback from our Support Line and the 2024 Big Parenting Survey, this issue is particularly pronounced among pre-teen and teenage girls and increasingly affects boys as well and therefore a source of concern for parents. **Specific Examples of Body Image or Depressive Content Linked to Significant Harms to Children** 1. **Body Image Content**: o **Social Media Influence**: Studies have shown that social media platforms like Instagram and TikTok frequently feature content that promotes unrealistic body standards. Exposure to such content has been linked to body dissatisfaction, low self-esteem, and eating disorders among teenagers. This is reported regularly by parents in our programmes. o **Pro-Ana and Thinspiration Content**: Websites and social media groups that promote anorexia (pro-ana) or share thinspiration (thinspo) images can encourage harmful behaviours like extreme dieting and excessive exercise. These communities often disguise themselves under hashtags or euphemisms, making them harder to detect and regulate. This is a concern for parents trying to regulate their child's activity. 2. **Depressive Content**: o **Self-Harm and Suicide**: Online forums and social media platforms sometimes host content that glorifies self-harm or suicide. o **Depression Normalisation**: Some online communities may inadvertently normalise depressive symptoms by framing them as a common, unchangeable part of adolescence. This can discourage affected young people from seeking help and foster a sense of hopelessness. In the 2024 Big Parenting Survey, parents shared concerns that their child's mental ill health was exacerbated by viewing content online.

Question	Your response
	Recommendations for Addressing Body Image and Depressive Content

| | 1. **Enhanced Monitoring and Filtering**: Implement advanced AI tools to better detect and filter content related to body image issues and depressive symptoms. This includes monitoring hashtags, keywords, and user behaviours indicative of harmful content.

2. **Clear Reporting Mechanisms**: Establish straightforward and accessible reporting mechanisms for users to flag content related to body image and mental health concerns. Ensure rapid response and content removal.

3. **Educational Campaigns**: Promote educational campaigns aimed at parents, educators, and children about the dangers of body image and depressive content online. These campaigns should emphasise media literacy and critical thinking skills. These should be easily accessible to parents and delivered by a range of methods.

4. **Support Resources**: Integrate support resources and helplines directly into platforms where such content is prevalent, providing immediate access to help for affected children.

5. **Regular Audits and Updates**: Conduct regular audits of online platforms to identify new trends and emerging risks related to body image and depressive content. Update policies and guidelines accordingly.

While body image and depressive content may not fit neatly into existing categories of priority content, their insidious and pervasive nature necessitates robust regulatory measures. By acknowledging these risks and implementing targeted strategies, Ofcom can better protect children from these significant online harms. |

Draft Guidance on Content Harmful to Children (Section 8)

Question	Your response
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?	12. Overall, we agree with Ofcom's proposed approach, including the level of specificity of examples and the inclusion of contextual information. This approach provides clear guidance while allowing for the necessary flexibility to address the complex nature of online content. By continuously refining these guidelines and supporting service providers, Ofcom can

Question	Your response
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 a) should consider to be harmful or b) consider not to be harmful or c) where our current proposals should be reconsidered?	significantly enhance the protection of children from online harms. - o **Strengths**: Providing specific examples is essential for clarity. It helps service providers understand precisely what types of content are considered harmful and need monitoring. Clear examples reduce ambiguity and ensure that providers can implement more effective content moderation policies. - o **Concerns**: The challenge lies in ensuring that the examples are comprehensive enough to cover the vast range of potential harmful content without being overly prescriptive or rigid. **Practical Implementation**: - o **Strengths**: Specific examples make it easier for service providers to train their content moderation teams and develop automated systems to detect harmful content. This practical guidance can lead to more consistent and effective content moderation across platforms. - o **Concerns**: There is a risk that focusing too narrowly on provided examples might cause service providers to miss other harmful content that doesn't fit those exact descriptions. **Inclusion of Contextual Information** 1. **Importance of Context**: - o **Strengths**: Including contextual information is crucial because the impact of content can vary greatly depending on its context. For instance, content that might be benign in one setting could be harmful in another, such as graphic images in educational versus social media contexts. - o **Concerns**: Assessing context can be complex and subjective. It requires sophisticated understanding and potentially more resources to evaluate content accurately. 2. **Flexibility and Adaptability**: - o **Strengths**: Contextual considerations allow for a more nuanced approach to content moderation. It ensures that decisions are not made purely on the presence of certain keywords or images but also on the overall context and potential impact on viewers, particularly children.

Question	Your response
	◦ **Concerns**: There might be inconsistencies in how different platforms interpret and apply contextual information, leading to variability in the effectiveness of content moderation.

Recommendations

1. **Balanced Specificity**: Strive for a balance in the specificity of examples by regularly updating the list to reflect new trends and types of harmful content while avoiding overly rigid guidelines.

2. **Training and Resources**: Provide training and resources for service providers to understand and implement context-based content moderation. This could include workshops, detailed guidelines, and case studies.

3. **Regular Review and Feedback**: Establish mechanisms for regular review and feedback from stakeholders, including service providers, parents, and child safety experts, to ensure the approach remains relevant and effective.

4. **Advanced Tools and AI**: Invest in advanced AI and machine learning tools capable of understanding context to assist human moderators in making informed decisions.

Volume 4: How should services assess the risk of online harms?

Governance and Accountability (Section 11)

Question	Your response
15. Do you agree with the proposed governance measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and explain your views 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.	15. Parenting Focus has reviewed Ofcom's proposed governance measures to be included in the Children's Safety Codes. While we appreciate the effort to create a safer online environment for children, we have significant concerns regarding the adequacy of these measures. **Key Concerns** 1. **Insufficient Protection Measures**: ○ **Reliance on Children and Parents**: The proposed measures place considerable responsibility on children and their parents to navigate and mitigate online risks themselves. This approach is problematic because children, especially younger ones, lack the maturity and skills to recognise and respond to online dangers effectively. Similarly, many parents tell us that they do not have the necessary knowledge or resources to adequately protect their children.

Question	Your response
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?	o **Evidence**: Research indicates that children often do not possess the cognitive ability to understand online risks fully and that parental control tools are not always effective due to a lack of awareness or technical know-how among parents. There are significant concerns amongst Parenting Focus parents on how to best protect their child online due to a large amount of conflicting and misinformation. The Parents we consulted have significant concerns among parents regarding the best ways to protect their children online. Parents frequently express frustration over the large amount of conflicting and misleading information about online safety. This confusion is compounded by the fact that online platforms vary widely in their safety features and policies, making it challenging for parents to keep up with the best practices for each platform. As a result, there is a clear need for more robust, platform-driven safety measures that do not rely heavily on parents' ability to manage their children's online experiences. Without these measures, children remain at significant risk of encountering harmful content and interactions online. 2. **Inadequate Deterrence for Large Companies**: o **Lack of Strong Penalties**: The current governance measures do not impose sufficient penalties on large companies that fail to comply with safety standards. Without robust deterrents, there is little incentive for these companies to prioritise child safety over profit. o **Evidence**: Historical data shows that without substantial fines or legal repercussions, tech companies have often been slow to implement meaningful changes to protect users, particularly minors. **Recommendations** 1. **Stronger Regulatory Enforcement**: o **Increased Fines and Sanctions**: Implement significant financial penalties and legal sanctions for non-compliance. These should be substantial enough to compel large companies to invest in robust child protection measures. o **Regular Audits and Transparency**: Mandate regular audits of platforms to ensure compliance with safety codes and require

Question	Your response
	companies to publicly report their safety practices and incidents.

2. **Enhanced Support for Parents and Children**:

   o **Educational and Support Programmes**: Develop comprehensive educational programmes aimed at both children and parents to enhance their understanding of online risks and safety practices. These programmes should be accessible, regularly updated, and widely promoted. These should also be codesigned with parents to ensure that they are effective.

Feedback from parents we consulted indicates a strong demand for educational programmes that are not only informative but also practical and easy to implement. Parents have highlighted the importance of these programmes being regularly updated to keep pace with new and emerging online threats and technological advancements. They believe that keeping up to date with the latest information is crucial for maintaining a safe online environment for their children.

Co-design with Parents:

Moreover, parents have stressed the importance of co-designing and that by involving parents in the development process, these programmes can be tailored to address their specific concerns and needs, ensuring they are practical and user-friendly. Parents have expressed that their firsthand experience with their children's online behaviour can provide valuable insights into the most effective safety practices.

Implementation:

These programmes should be widely promoted and made easily accessible through various channels, including schools, community centres, and online platforms. Parents have suggested that workshops, webinars, and interactive online courses could be effective methods of delivery. They believe that such programmes should not only focus on the technical aspects of online safety but also address the psychological and social impact of online interactions.

Question	Your response
	Support for Diverse Needs:
	Parents have also pointed out the need for these educational programmes to cater to diverse needs, including those of non-English speaking families and those with varying levels of digital literacy. Providing materials in multiple languages and formats can help ensure that all parents, regardless of their background or technical proficiency, can benefit from these resources.
	Conclusion:
	In conclusion, there is a clear and pressing need for comprehensive educational programmes aimed at both children and parents. These programmes should be co-designed with parents, regularly updated, widely promoted, and accessible to all. By addressing the specific concerns and needs of parents, these programmes can play a crucial role in enhancing online safety for children and empowering parents to better protect their children in the digital age.
	o **Technical Tools and Resources**: Provide more advanced and user-friendly technical tools for parents to monitor and manage their children's online activities. Collaborate with tech companies to ensure these tools are effective and easy to use. Again, codesign with parents is essential in this process.
	3. **Proactive Measures by Companies**:
	o **AI and Machine Learning**: Encourage the use of advanced AI and machine learning technologies to detect and mitigate harmful content proactively. Platforms should invest in technology that can identify and respond to threats in real-time.
	o **Child-Friendly Design**: Promote the design of platforms and services with child safety as a core principle, including age-appropriate content filters, simplified privacy settings, and clear reporting mechanisms.
	While the proposed governance measures are a welcome step, they do not go far enough to ensure the safety of children online. They place unfair responsibility on children and parents and do not impose

Question	Your response
	strong enough deterrents on large companies, the measures fall short of creating a genuinely safe online environment. We urge Ofcom to consider more stringent regulations and proactive measures to protect our children effectively.
	We strongly believe that our recommendations will strengthen the governance measures and provide a safer digital space for children.

Children's Risk Assessment Guidance and Children's Risk Profiles' (Section 12)

Question	Your response
17. What do you think about our proposals in relation to the Children's Risk Assessment Guidance? a) Please provide underlying arguments and evidence of efficacy or risks that support your view. 18. What do you think about our proposals in relation to the Children's Risk Profiles for Content Harmful to Children? a) Please provide underlying arguments and evidence of efficacy or risks that support your view. Specifically, we welcome evidence from regulated services on the following: 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? 20. Are there any specific aspects of the children's risk assessment duties that you consider need additional guidance	**17.** Parenting Focus broadly welcomes the general framework of the four-step methodology proposed by Ofcom. We believe having a structured approach to assessing risks is a positive step towards enhancing child safety online. 1. **Specific Concerns**: **Comprehensiveness**: Parenting Focus has some concerns regarding the comprehensiveness of the methodology. We are unsure as to whether the four steps adequately cover a wide range of online risks that children may encounter, such as cyberbullying, exposure to inappropriate content, and online grooming. **Adaptability:** Parenting Focus would seek reassurance about the methodology's adaptability to evolving online threats and technological advancements. Emphasising the importance of flexibility in the guidelines ensures they remain relevant and effective over time. It is crucial that these guidelines can respond to new challenges as the digital landscape continues to change. **Enforcement and Accountability:** Parenting Focus would like clarification on how adherence to these risk assessment guidelines will be enforced across different online platforms. Highlighting the importance of holding platforms accountable for implementing robust risk assessment practices is essential to ensure compliance and the protection of children online. **3. Recommendations for Enhancement:** **Strengthening Guidance:** We suggest specific enhancements or additions to the guidance that could further bolster child protection efforts. This might include incorporating best practices from international frameworks or industry standards. For example, integrating insights from the United Nations' Guidelines

Question	Your response

beyond what we have proposed in our draft?
 	
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?
 	
 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.
	for Industry on Child Online Protection could enhance the robustness of the proposed measures.
	
	Training and Support: We advocate for the implementation of training and support programmes to assist platforms in effectively implementing the risk assessment methodology. This could involve collaborative efforts between Ofcom, industry stakeholders, and child protection experts. Providing platforms with the necessary resources and support will be crucial in ensuring that they can comply with and benefit from these guidelines.
	
	In conclusion, Parenting Focus strongly supports the intent behind Ofcom's Children's Risk Assessment Guidance. However, we emphasise the need for robustness and effectiveness in its implementation to ensure that children are adequately safeguarded online.
	
	21. Parenting Focus agrees that the Children's Risk Profiles are sufficiently clear and comprehensive, effectively outlining the various risks that children may encounter online. The inclusion of detailed information on risk factors provides valuable insights that can help service providers understand and mitigate these risks. With the four-step guidance, we believe that this combined approach of detailed risk profiles and practical guidance is a strong foundation for enhancing online safety for children.
	
	1. **Comprehensive Coverage**:
	
	   o **Inclusive Factors**: Ensure that Children's Risk Profiles encompass a wide range of factors beyond cognitive development and behavioural patterns. Consider aspects like cultural differences, disabilities, and socio-economic backgrounds, which can influence online risks and safety.
	
	2. **Regular Updates and Adaptation**:
	
	   o **Dynamic Nature**: Recognise that online risks evolve rapidly. Profiles should be regularly updated to reflect emerging trends and technological advancements, ensuring that risk assessments remain relevant and effective over time.
	
	3. **Integration with Existing Frameworks**:
	
	   o **Synergy with Four Steps**: Profiles should seamlessly integrate with the four-step risk assessment process. This integration ensures a

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	holistic approach where understanding vulnerabilities through Profiles informs each stage of risk identification, assessment, mitigation, and review. 4. **Validation and Effectiveness**: o **Evidence-Based Approach**: Advocate for a robust validation process to ensure that Profiles are based on empirical research and evidence. This enhances their credibility and effectiveness in guiding risk management practices for online services. In conclusion, while Children's Risk Profiles offer valuable insights into age-specific vulnerabilities and behaviours, their effectiveness hinges on robustness alongside the structured four-step risk assessment process. By ensuring comprehensive coverage, regular updates, integration with existing frameworks, and evidence-based validation, services can leverage Profiles effectively to enhance child safety online. This integrated approach will ultimately contribute to more targeted and effective measures to protect children from online harms.

Volume 5 – What should services do to mitigate the risk of online harms

Our proposals for the Children's Safety Codes (Section 13)

Question	Your response

Proposed measures
 	
 22. Do you agree with our proposed package of measures for the first Children's Safety Codes?
 	
 a) If not, please explain why.
 	
 Evidence gathering for future work.
 	
 23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?
 	
 a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results
	Parenting Focus agrees with the following aspects of the proposed measures:
	
	 1. **Robust Governance and Accountability**:
	    o **Senior Oversight**: It is crucial for service providers to have clear senior responsibility and accountability for children's safety online. This ensures that safety measures are prioritised at the highest levels of decision-making within companies.
	
	 2. **Safer Platform Design Choices**:
	    ○ **Age Verification and Safety Features**: Services must understand their users' ages and implement effective measures such as age verification and appropriate content moderation. This is essential for preventing online harms to children, including through recommender systems that may inadvertently expose them to inappropriate content.
	
	 Concerns and Suggestions:

Question	Your response
from trialling or testing of measures. 24. Are there other areas in which we should consider potential future measures for the Children's Safety Codes? a) If so, please explain why and provide supporting evidence.	Parenting Focus has concerns regarding the proposed measures related to providing children with information, tools, and support: 1. **Accessibility of Reporting and Complaint Functions**: ○ **Ease of Use**: Many current reporting and complaint functions are cumbersome and difficult for both children and parents to navigate. Lengthy questions and reliance on chatbots instead of human support often hinder effective use of these tools. ○ **Clarity and Accessibility**: There is a need for clear, accessible information on how to use reporting and complaint functions. Often, children and their parents may not understand when or how to use these tools effectively, placing undue burden on them rather than on the tech companies to ensure user-friendly systems. 2. **Improving Support Mechanisms**: ○ **User Support**: Services should prioritise human interaction over automated responses (chatbots) to assist children and parents. Human support can provide empathy and better guide users through reporting processes. ○ **Education and Awareness**: More efforts are needed to educate both children and parents about the existence and importance of reporting and complaint functions. This includes clear guidance on when and how to use these tools effectively. In conclusion, while Parenting Focus supports governance and accountability measures proposed by Ofcom, there are significant concerns regarding the accessibility and effectiveness of information, tools and support for reporting and complaints. By addressing these concerns and implementing the recommended enhancements, services can better fulfil their obligations under the Children's Safety Codes and improve overall child safety online.

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?
	25. Parenting Focus agrees with aspects of the approach, such as the emphasis on governance and accountability, but we have concerns about the accessibility and usability of reporting and support tools. Stronger measures in certain areas, such as age verification or educational outreach, codesigned with parents are needed.
	
	Ultimately, the effectiveness of Ofcom's proposed measures will depend on their implementation and the extent to which they address the complex and evolving landscape of online risks faced by children.
	
	Parenting Focus emphasises the critical importance of equipping service providers with robust resources to educate both children and their caregivers about online safety. This includes ensuring that information, tools, and support mechanisms are comprehensive, highly accessible and effective:
	
	Concerns:
	
	Parenting Focus acknowledges the efforts made by Ofcom in proposing measures to provide information, tools and support. However, we have significant concerns about the accessibility and usability of these resources:
	
	1. **Accessibility and Usability**:
	
	   o **Parent and Child Perspectives**: Many parents feel that existing resources for online safety are not sufficiently accessible. They often find reporting and complaint functions overly complex, with lengthy processes and confusing interfaces. Children also may struggle to understand when and how to use these tools effectively.
	
	2. **Empowerment through Education**:
	
	   o **Need for Clarity**: There is a strong desire for clearer and more user-friendly information on safety features, reporting mechanisms, and support channels. This includes ensuring that educational materials are age-appropriate and easily understandable for children and their parents and carers.
	
	Recommendations:
	
	To address these concerns and enhance the effectiveness of information, tools, and support in promoting

online safety, Parenting Focus recommends the following:

1. **Improved Accessibility and Clarity**:

   - **Simplified Processes**: Advocate for streamlined reporting and complaint processes that minimise complexity and reduce reliance on automated responses like chatbots. Human interaction should be prioritised to provide empathy and clear guidance to users.

   - **Clear Communication**: Encourage platforms to provide straightforward, jargon-free explanations of safety features and support options. This could include visual aids, step-by-step guides, and FAQs that address common concerns.

2. **Comprehensive Education Campaigns**:

   - **Targeted Outreach**: Support initiatives that educate both children and parents about online safety. These campaigns should be tailored to different age groups and demographics, ensuring that everyone understands the risks and knows how to navigate digital environments safely.

   - **Collaborative Efforts**: Advocate for collaboration between Ofcom, tech companies, and child rights organisations to develop and distribute educational materials. This includes leveraging existing platforms and channels to reach a wide audience effectively.

3. **Continuous Feedback and Improvement**:

   - **Feedback Mechanisms**: Establish feedback loops to gather input from parents, children, educators and other stakeholders on the effectiveness of educational resources and support tools. Use this feedback to continuously refine and improve these resources over time.

By prioritising these recommendations, Parenting Focus aims to ensure that the proposed measures for providing information, tools and support are implemented effectively with a strong emphasis on accessibility and usability. This approach not only empowers users to navigate online risks more confidently but also fosters a safer digital environment for children and families overall.

27. Parenting Focus is concerned with ensuring that all services, regardless of size, which have the potential to cause harm to children are subject to robust measures that ensure maximum impact in protecting children online.

Parenting Focus believes that protecting children online should be a universal priority and therefore, all services that have the potential to pose a risk to children should be subject to comprehensive and robust safety measures.

1. **Uniform Application of Measures**:
   - Parenting Focus supports the idea that safety measures should not be limited to only large services or those deemed high-risk. They advocate for a universal application of measures across all services that have the potential to expose children to online harms.

2. **Ensuring Maximum Impact**:
   - It is crucial that these measures are robust and effective in mitigating risks to children. This includes stringent guidelines on content moderation, age verification, reporting mechanisms, and educational initiatives that are applicable and enforceable across all relevant services.

3. **Support for Smaller Services**:
   - While recognising the varying capacities of different-sized services, Parenting Focus emphasises the importance of providing support and resources to smaller services to ensure they can implement these measures effectively. This could involve guidance, training, and potentially phased implementation timelines to support compliance.

4. **Regulatory Oversight**:
   - Parenting Focus calls for strong regulatory oversight to ensure that all services comply with these safety measures. This may include monitoring, reporting requirements, and penalties for non-compliance to incentivise adherence to child safety standards.

By advocating for a comprehensive approach to child safety online, Parenting Focus aims to ensure that all children are protected uniformly across digital platforms, promoting a safer and more secure online environment for young users.

29. Despite agreeing with the proposed measures, Parenting Focus raises the following concerns and recommendations for stronger protections:

1. **Stringency of Measures**:
   - There is some concern that the proposed measures may not be stringent enough to fully safeguard children from the diverse risks posed

by multi-risk services. We suggest evaluating and potentially enhancing measures such as more rigorous content moderation standards, stricter age verification processes, and improved reporting mechanisms.

2. **Continuous Improvement**:
   - There must be a commitment to continuous improvement and adaptation of measures based on evolving risks and technological advancements. This includes regular updates to safety protocols and proactive monitoring of emerging trends in online threats to children.

3. **Transparency and Accountability**:
   - Transparency in reporting on child safety measures and holding multi-risk services accountable for compliance with regulatory standards. This ensures that platforms prioritise child safety as a fundamental responsibility.

Conclusion:

While Parenting Focus supports Ofcom's efforts to introduce specific measures for multi-risk services, we stress the need for vigilance and robustness in safeguarding children online.

30. Parenting Focus strongly agrees with Ofcom's proposal that all online services, regardless of size or perceived risk level, must be required to implement measures to protect children. Child protection must be a fundamental priority for any online service, and that all platforms have a duty of care to safeguard children from potential harm. Parenting Focus underscores the critical importance of prioritising child protection in all online services:

- A **Comprehensive Approach** that addresses the unique challenges posed by different types of online platforms, regardless of their size or operational scale is needed.

  - **Education and Awareness** that empowers both children and parents with the knowledge and tools to navigate online risks safely must be continuous and dynamic.

  - **Collaboration** between regulatory bodies, industry stakeholders and child rights organisations to develop and implement effective safety measures across the digital landscape.

	In conclusion, Parenting Focus believes that child protection should be a universal priority for all online services.

Age assurance measures (Section 15)

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. a) Are there any cases in which HEAA may not be appropriate and proportionate? 32. Do you agree with the scope of the services captured by AA1-6? 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? 34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services? a) Please provide any supporting information or evidence in support of your views. 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?	31. Parenting Focus strongly supports the proposal to recommend the use of highly effective age assurance measures to support Measures AA1-6 for child protection online. These measures are crucial for ensuring that children are shielded from age-inappropriate content and interactions on digital platforms. Parenting Focus expresses concerns about the efficacy and evolving nature of age assurance technologies in the context of HEAA. There is particular concern about the potential impact of AI on HEAA or similar regulatory standards. They may raise questions about AI's ability to mimic adult behaviour or deceive age verification systems, thereby undermining their effectiveness In conclusion, Parenting Focus supports the recommendation for highly effective age assurance measures to protect children online. **32.**Parenting Focus appreciates Ofcom's efforts to propose Measures AA1-6 aimed at enhancing online safety for children through age assurance mechanisms. These measures encompass access controls, content controls, and recommender system safeguards, all crucial in mitigating risks associated with harmful content.

Content moderation U2U (Section 16)	
36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. 37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes? a) Please provide any arguments and supporting evidence.	Yes, it's reasonable to agree that the proposals for content moderation systems (CM1-CM7) are positive steps toward enhancing online safety for children. However, ensuring these measures are effectively implemented and rigorously adhered to by tech companies is crucial.

Search moderation (Section 17)	
38. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. 39. Are there additional steps that services take to protect children from the harms set out in the Act? a) If so, how effective are they? 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? 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	38. While we support these proposals in principle, Parenting Focus has significant concerns about their implementation and enforcement: 1. **Implementation Challenges:** There is a need to ensure that the proposed measures are effectively implemented across all search engine platforms uniformly. This includes adequate resourcing, technical capabilities, and training for moderation teams. 2. **Enforcement and Compliance:** Rigorous enforcement mechanisms are essential to ensure that search engine providers comply with these guidelines consistently. This includes monitoring, reporting, and sanctions for non-compliance where necessary. 3. **Involvement of Parents:** It is imperative to involve parents and guardians in the review and assessment of these measures. Parenting Focus emphasises the importance of incorporating parental perspectives to understand the practical impact of search moderation on children's online safety. **Review Mechanisms:** To address these concerns, Parenting Focus recommends establishing robust review mechanisms that include: • **Regular Audits and Assessments:** Conducting regular audits by independent bodies to evaluate the implementation and effectiveness of search moderation measures. • **Stakeholder Engagements and Consultations:** Engaging with stakeholders, including parents, children and young people, educators and child

questions and please provider arguments and evidence to support your views:

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?

42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions?

rights advocates, to gather feedback on the adequacy of search moderation practices.

- **Transparency and Accountability:** Requiring search engine providers to publish transparency reports detailing their moderation efforts and outcomes, ensuring accountability to the public and regulatory authorities.

In conclusion, Parenting Focus believes that effective search moderation is essential for protecting children online. We advocate for a comprehensive approach that not only sets clear standards but also ensures robust enforcement and meaningful engagement with parents throughout the process. By addressing these concerns, we can collectively work towards a safer online environment for all users, especially children.

40. Parenting Focus acknowledges the importance of prioritising child safety in online environments, particularly concerning search content. We agree with the proposal that providers should take proactive measures to ensure that content deemed harmful or inappropriate for children does not appear in the search results of users identified by the provider as children.

It is imperative that providers prioritise safety by implementing robust mechanisms to prevent children from accessing content that could potentially harm their well-being or development. This includes:

- **Identification of Primary Priority Content:** Providers should clearly identify content that poses significant risks to children, such as explicit material, violence, hate speech, or other harmful content.

- **Exclusion from Search Results:** Ensuring that this identified primary priority content does not surface in search results for users believed to be children is critical. This proactive approach helps mitigate exposure to inappropriate material and supports a safer online experience for young users.

Implementation and Considerations:

While we support these measures in principle, it is essential to consider practical implementation challenges and ensure that:

- **Accuracy and Effectiveness:** Mechanisms for identifying child users and filtering content must be accurate and effective to prevent unintended consequences such as over-censorship or under-censorship.

	• **Transparency and Accountability:** Providers should be transparent about their methods for identifying child users and filtering content, ensuring accountability to users and regulatory bodies.
	Involvement of Stakeholders:
	Parenting Focus emphasises the importance of involving parents, children and young people educators, and child rights advocates in the development and review of these measures. Their perspectives and insights are crucial in shaping effective policies that prioritise child safety while respecting freedom of information and expression.
	Parenting Focus supports the proposal that providers should prioritise child safety in search content by preventing harmful content from appearing in the search results of users believed to be children. We urge providers to implement these measures thoughtfully, with a commitment to transparency and effectiveness, to create a safer online environment for all children.

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? a) Please confirm which proposed measure your views relate to and explain your views 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. 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? a) Please confirm which proposed measure your views relate to and explain your views and provide any	43. Parenting Focus strongly supports these measures but again emphasises the need for robust implementation to address common user concerns and barriers to reporting: 1. **User-Friendliness:** The reporting mechanisms must be intuitive, easy to access, and straightforward to use. Many parents hesitate to use current reporting procedures due to perceived complexities or lack of clarity. 2. **Transparency and Accountability:** It is crucial that services clearly explain their complaint procedures to users, ensuring transparency in how complaints are handled and resolved. This transparency builds trust and encourages users to engage with the reporting process. 3. **Timeliness and Effectiveness:** Complaints should be acknowledged promptly with clear communication on the expected timeframe for resolution. Users need assurance that their concerns are taken seriously and will result in appropriate actions being taken. 4. **Impact and Follow-Up:** There should be mechanisms in place to follow up with users after a complaint has been submitted, providing feedback on actions taken and outcomes. This feedback loop is

arguments and supporting evidence.	essential for demonstrating accountability and improving user confidence in reporting procedures.
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.	Parenting Focus urges Ofcom to ensure that the proposed user reporting measures are implemented robustly and effectively. It is imperative to address user concerns and barriers to reporting, ensuring that parents and children feel empowered to use these mechanisms confidently. By prioritising user-friendliness, transparency, and responsiveness, we can collectively enhance online safety for children.
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)?	44. Parenting Focus strongly agrees with implementing Measures UR2 (e) and UR3 (b) across all services likely to be accessed by children for all types of complaints. These measures are essential for fostering a safer online environment and ensuring that children and their families have the tools and support needed to address concerns promptly and effectively.
a) Please provide any arguments and supporting evidence.	

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.	46. **Transparency and Accountability:** Publishing clear and accessible terms or statements regarding child protection enhances transparency, allowing parents and guardians to make informed decisions about their children's online activities. It also holds service providers accountable for adhering to regulatory standards and guidelines. • Reassurance **to Parents:** Providing summaries of risk assessments in terms or statements reassures parents that service providers are diligently assessing and managing risks associated with children's online safety. This transparency builds trust and confidence among parents, encouraging them to allow their children to use online services responsibly. • Complementary **Measures:** These measures, when implemented alongside clear and accessible complaints procedures (as discussed previously), create a comprehensive framework for safeguarding children online. They empower parents with information and channels to address concerns effectively, promoting a safer online environment for children. These measures are essential for promoting transparency, accountability, and parental confidence in service providers' efforts to safeguard children online.
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	49. Parenting Focus urges Ofcom to adopt Measure RS1 in the Children's Safety Codes, ensuring that recommender systems are designed to effectively filter out potentially harmful content from children's feeds. This measure enhances online safety by reducing children's exposure to inappropriate material and empowering them with mechanisms to provide feedback on their online experiences. 52. Parenting Focus strongly supports the inclusion of Measures RS2 and RS3 in the Children's Safety Codes, specifically concerning the

is relevant 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.

limitation of prominence for depressive content and body image content in recommender systems:

1. **Protection of Children's Mental Health:** Depressive content and body image content can have significant negative impacts on children's mental health and well-being. Studies have shown that exposure to such content at a young age can contribute to feelings of inadequacy, anxiety, and depression.

2. **Parental Concerns:** Parenting Focus regularly receives feedback from parents expressing deep concerns about their children being exposed to content that promotes negative body image or depressive thoughts. Limiting the prominence of this content in recommender systems aligns with parents' desires to protect their children from harmful influences online.

3. **Responsibility of Service Providers:** By recommending that U2U services reduce the visibility of depressive and body image content in recommender feeds, service providers acknowledge their responsibility to prioritise child safety and well-being. This proactive approach demonstrates a commitment to creating a safer online environment for young users.

b) Relevance to Measures RS2 and RS3:

- **RS2:** Reducing the prominence of potentially harmful content (PC) in recommender feeds helps mitigate the risk of children encountering content that could negatively impact their emotional and mental health. This measure aims to safeguard children by minimising their exposure to content likely to be harmful.

- **RS3:** Providing children with a means to express negative sentiment and feedback directly on the recommender feed regarding content they encounter enhances user empowerment and allows for adjustments based on individual preferences and safety concerns. This feedback mechanism is crucial in ensuring that children's voices are heard and their online experiences are tailored to promote positive engagement.

	This step is vital in addressing parental concerns and protecting children from potentially harmful online content, thereby fostering a safer and more supportive online environment for all young users.

User support (Section 21)

| 53. Do you agree with the proposed user support 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 to your response here, please signpost to the relevant parts of your prior response. | 53. Parenting Focus fully supports the inclusion of these user support measures in the Children's Safety Codes. Implementing these measures will enhance the safety and well-being of children online by empowering users to report harmful content and providing timely crisis support when needed.

Parenting Focus recognises the critical importance of crisis prevention information for parents navigating online safety concerns, particularly in response to harmful content such as suicide, self-harm, and eating disorders. Our response to the proposed user support measures in the Children's Safety Codes underscores the following points:

a) Parental Feedback and Concerns:

Parents have consistently shared with Parenting Focus that when faced with crisis situations involving harmful online content, their immediate response is often to restrict or ban access to the technology or website in question. While this may temporarily mitigate exposure, parents express a need for more proactive and supportive measures to effectively manage such situations.

b) Supportive Measures Needed:

Providing crisis prevention information directly addresses this need by equipping parents with resources and guidance to effectively intervene and support their children in distress. By offering accessible information on helplines, mental health services, and crisis intervention tools, parents can make informed decisions and take decisive actions to ensure their child's safety and well-being.

Parenting Focus strongly welcomes the inclusion of crisis prevention information in the Chil- |

dren's Safety Codes. This initiative not only empowers parents with essential tools but also reassures them that they are not alone in managing online safety challenges. It demonstrates a proactive approach by service providers to support families in crisis situations and underscores a commitment to safeguarding children's mental health in the digital age.

c) Importance of Parental Support:

Effective crisis prevention measures not only benefit children but also support parents in fulfilling their role as primary caregivers and protectors. Access to timely and relevant information empowers parents to navigate complex online environments with confidence and ensures they have the necessary support networks to turn to in times of need.

Parenting Focus urges Ofcom to proceed with implementing comprehensive crisis prevention information as part of the Children's Safety Codes. This initiative represents a significant step towards enhancing online safety for children and providing invaluable support to parents facing challenging circumstances.

Search features, functionalities and user support (Section 22)

54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views. 55. Do you have additional evidence relating to children's use of search services and the impact of search functionalities on children's behaviour? 56. Are there additional steps that you take to protect children from harms as set out in the Act? a) If so, how effective are they? As referenced in the Overview of Codes, Section 13 and Section 17, the use of GenAI to facilitate search is an emerging	54. Collaboration between stakeholders, including regulators, service providers, educators, and parents, is essential for ensuring comprehensive implementation. Clear guidelines and regular oversight will help monitor adherence to these measures and address emerging challenges. Parenting Focus strongly agrees with Ofcom's proposals and emphasises the importance of their proper implementation to enhance child safety online. These initiatives represent significant steps towards creating a safer digital environment for children and empowering families to navigate online challenges with confidence.

development and 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 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.

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?	Parenting Focus appreciates the effort by Ofcom to address online safety through proposed measures categorised by service size and risk level. However, we have significant reservations regarding the adequacy of these measures in ensuring robust protection for children online. **a) Concerns with Proposed Measures:** 1. **Effectiveness in Ensuring Child Safety:** o While Ofcom's proposed measures categorise services based on size and risk level, we believe that some of the core measures recommended for smaller, low-risk services may not be sufficient to adequately safeguard children from online harms. There is a need for more stringent guidelines and proactive measures that comprehensively address risks across all service types. 2. **Implementation Challenges:** o Parenting Focus remains concerned about the practical implementation of these measures across different service providers. Without stringent enforcement and clear consequences for non-compliance, there is a risk that online platforms may not prioritise child safety measures as effectively as needed. 3. **Impact on Children's Safety:** o The safety of children online should be paramount, regardless of service size or risk level. We urge Ofcom to ensure that the proposed measures. o res not only cover a broad spectrum of risks but also enforce a rigorous compliance framework to hold service providers accountable for maintaining safe online environments for children. **b) Call for Strengthened Measures:** 1. **Comprehensive Approach:** o Parenting Focus advocates for a more comprehensive approach that includes robust governance, content moderation, and

	user support measures across all service categories. This approach should prioritise proactive steps to prevent harmful content exposure and empower children with age-appropriate safety tools.
	2. **Transparency and Accountability:**
	o It is crucial for Ofcom to establish transparent reporting mechanisms and regular audits to assess compliance with online safety measures. This ensures that service providers are held accountable for their commitments to child protection and that parents can trust in the safety of online platforms accessed by their children.
	Parenting Focus believes that while Ofcom's proposed measures are a step in the right direction, they must be strengthened to effectively mitigate online risks to children. We urge Ofcom to reconsider and enhance the measures to ensure they are proportionate to the potential impact on children's safety and enforceable across all service types.

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.	

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 | Parenting Focus has been advocating for and supporting parents in Northern Ireland for 45 years.

Parenting Focus undertook direct consultation with a small group of parents on the "Proposed Codes". These parents found the Consultation documents issued by Ofcom extremely difficult to understand and considerable time was spent |

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? 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.	trying to make it more accessible. The Parents we spoke to and those who have participated in other engagement projects such as the 2024 Big Parenting Survey are clear that one of their biggest concerns is the online safety of their children. Parents are desperate for support and information that will help them to keep their children safe online and that they have sufficient and appropriate recourse to redress when they are not. Parenting Focus believes that this is an important consultation but it has been inaccessible to many parents without a high standard of education and familiarity with the operations of the online world and to children and young people generally. We remind Ofcom of S75 of NI Act, 1998. It is our understanding that Ofcom is subject to the requirement that public authorities have due regard to the need to promote equality of opportunity between the nine equality categories including "persons with (eg parents) and without dependants" outlined in S75. As such and in accordance with ECNI guidance, consultation processes such as this one should ensure that Ofcom understands what it needs to do to understand the impact of their proposals on parents. To do this Ofcom should have engaged directly with parents and children in NI to ascertain their views. Parenting Focus therefore looks forward to reading the outcome of this consultation and Ofcom's assessment of the impact of any proposed changes to parents, in accordance with S75, NI Act 1998 and ECNI guidance. We welcome and participated in the event Ofcom facilitated in Belfast which was helpful. Along with our own work and engagement this response has drawn heavily on the work of the 5Rights Foundation (5Rights (5rightsfoundation.com)

Please complete this form in full and return to protectingchildren@ofcom.org.uk.