

Your response

Question	Your response
Question 1: Do you have any comments on Section 3 of the draft guidance on harmful material and related definitions?	<p>Confidential? – N</p> <p>We welcome the inclusion of ‘self-injurious content’ as an example of material that may impair the physical, mental or moral development of under-18s. The guidance from Ofcom should also explicitly recognise that self-harm and suicide material can carry serious harms for users of all ages and call on all sites and platforms to ensure robust policies are in place to protect users.</p> <p>Content that should be included in harmful material includes:</p> <ul style="list-style-type: none">• Promotion or encouragement of self-harm and suicide.• Graphic descriptions or depictions of acts of self-harm or suicide, such as open wounds and blood• Detailed methods or instructions for self-harm and suicide, including descriptions and depictions of equipment, and the evaluation or comparison of the effectiveness of different methods.• Suicide pacts and challenges, where users may be encouraged to harm themselves. <p>Where appropriate, please link to Samaritans Industry Guidelines for advice and guidance on how to manage self-harm and suicide related content: Industry guidelines for managing self-harm and suicide content (samaritans.org)</p>
Question 2: Do you have any comments on the draft guidance about measures which relate to terms and conditions, including how they can be implemented?	
Question 3: Regarding terms and conditions which prohibit relevant harmful material, do you have any comments on Ofcom’s view that effective protection of users is unlikely to be achieved without having this measure in place and it being implemented effectively?	

Question 4: Do you have any comments on Ofcom's view that, where providers have terms and conditions requiring uploaders to notify them if a video contains restricted material, additional steps will need be taken in response to this notification to achieve effective protection of under-18s, such as applying a rating or restricting access?

Question 5: Do you have any comments on the draft guidance about reporting or flagging mechanisms, including on Ofcom's view that reports and flagging mechanisms are central to protecting users?

Confidential? – N

We support Ofcom's view that reporting and flagging mechanisms are a central part of protecting users. It is essential that all VSPs present users with the opportunity to flag or report self-harm and suicide related content that they find worrying or harmful. Where possible, platforms should try to incorporate self-harm and suicide specific reporting categories.

Reporting mechanisms should be user-tested to ensure they are clearly understandable, accessible and do not deter users from reporting. For example, in our research with young people, we found that even the word 'report' can deter users from reporting self-harm and suicide content as it can sound like they are getting the user who posted into trouble. 'Flagging' content was discussed as an alternative term.

Reporting mechanisms should be considered from the perspective of the user making a report and the user being reported: in the case of self-harm and suicide, users posting content that breaks community guidelines are likely to be vulnerable or distressed and in need of support and guidance.

Information about reporting should be made clearly accessible to users, and should be displayed at the point of registration on a platform. Existing users should be regularly reminded of reporting and flagging mechanisms to encourage them to make reports. Any changes or updates to reporting mechanisms should be transparently communicated.

Please see our guidance on implementing reporting processes for self-harm and suicide content for further information: [Implementing user-friendly reporting for self-harm and suicide | Industry guidelines \(samaritans.org\)](#)

Question 6: Do you have any comments on the draft guidance about systems for viewers to rate harmful material, or on other tagging or rating mechanisms?

Confidential? – N

We are supportive of mechanisms allowing users to rate or label content and consider the use of content notes and trigger warnings to be good practice when posting online about suicide and self-harm. Platform-facilitated tagging and rating mechanisms would make this practice more straightforward and intuitive for users.

However, it is important not to rely on users to age-appropriately label self-harm and suicide content as this is likely to be a subjective judgement for the lay user. It is also worth noting that suicide and self-harm content does not necessarily fall easily into ‘harmful’ or ‘helpful’ categories and different users may perceive the same content from either perspective. Ultimately, the responsibility has to lie with platforms to detect and respond to this content quickly and effectively. User ratings should only be used as one part of a robust process for assessing and acting on harmful content.

Platforms should also ensure that asking users to rate potentially harmful content does not increase the time spent looking at that content to make a judgement.

Any user reporting or rating potentially distressing content relating to self-harm and suicide should be provided with signposting to available support.

Question 7: Do you have any comments on the draft guidance about age assurance and age verification, including Ofcom’s interpretation of the VSP Framework that VSPs containing pornographic material and material unsuitable for classification must have robust age verification in place?

Question 8: Do you have any views on the practicalities or costs relating to the implementation of robust age verification systems to prevent under-18s from accessing pornographic material and material unsuitable for classification? Please provide evidence to support your answer wherever possible.

Question 9: Do you have any comments on the draft guidance about parental control systems?

<p>Question 10: Do you have any comments on the draft guidance about the measure regarding complaints processes or on the regulatory requirement to provide for an impartial dispute resolution procedure?</p>	
<p>Question 11: Do you have any comments on the draft guidance about media literacy tools and information?</p>	<p>Confidential? – N</p> <p>As part of their commitment to media literacy, all platforms should host or signpost to accessible resources helping users to stay safe online around self-harm and suicide content. This signposting should be included at all the stages suggested in the draft guidance – during the registration process, at regular intervals and at the point of engagement with harmful material.</p> <p>Samaritans has published a hub of online safety resources about staying safe online when engaging with self-harm and suicide related content here: Online safety resources Samaritans</p>
<p>Question 12: Do you have any comments on the with the draft guidance provided about the practicable and proportionate criteria VSP providers must have regard to when determining which measures are appropriate to take to protect users from harm?</p>	
<p>Question 13: Do you have any comments on the draft guidance about assessing and managing risk?</p>	<p>Confidential? – N</p> <p>Platforms should be transparent about the way that they assess and manage risk in relation to self-harm and suicide content and continually evaluate processes. They must also ensure that they pass relevant information on to emergency services when content is posted that indicates that someone is at immediate risk of harm.</p> <p>Platform approaches to assessing and managing risk in relation to self-harm and suicide should be informed by subject matter experts, including academics and suicide prevention organisations. We welcome inclusion of Samaritans as a source of support and expertise in paragraph 6.17 of the draft guidance, and suggest that the final guidance should be reviewed to see whether the support we provide can be flagged elsewhere too, for</p>

	<p>example in developing policies about defining harmful material.</p>
<p>Question 14: Do you have any comments on the impact assessment in Annex 1, including the potential impacts to VSPs outlined in tables 1 and 2, and any of the potential costs incurred (including any we have not identified)?</p>	
<p>Question 15: Do you have any comments on our provisional assessment that the potential costs for providers are proportionate to achieve the regulatory requirements of the regime?</p>	
<p>Question 16: Do you have any comments on any other part of the draft guidance?</p>	<p>Confidential? – N</p> <p>Our understanding is that harmful content relating to suicide and self-harm content would fall, on the whole, into the category of ‘Restricted material’, meaning young people specifically should be protected from it. While we welcome steps to protect minors, suicide and self-harm material can be harmful to all users, regardless of age. Ofcom should therefore take the opportunity to call on all platforms and sites to consider the impact of suicide and self-harm content more broadly.</p>