

## Your response

Please refer to the sub-questions or prompts in the [annex](#) of our call for evidence.

Question	Your response
<p><b>Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.</b></p>	<p><i>Is this response confidential? – N</i></p> <p>The Stanford Internet Observatory is a cross-disciplinary program of research, teaching and policy engagement for the study of abuse in current information technologies, with a focus on social media.</p>
<p><b>Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see, at the following link, my peer-reviewed published article that analyses the results of a survey I conducted of online service providers regarding the trust &amp; safety programmes they have adopted for fighting illegal and/or harmful content on their services:</p> <p><a href="https://tsjournal.org/index.php/jots/article/view/14">https://tsjournal.org/index.php/jots/article/view/14</a></p>
<p><b>Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 4: What are your governance, accountability and decision-making structures for user and platform safety?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the recommendations provided in the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>

<p><b>Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which includes the survey responses of online service providers regarding their terms of service.</p>
<p><b>Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which includes recommendations for online service providers regarding improved reporting mechanisms for users.</p>
<p><b>Question 8: If your service has <i>reporting or flagging</i> mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers, including reporting mechanisms for users.</p>
<p><b>Question 9: If your service has a <i>complaints</i> mechanism in place, how are these processes designed and maintained?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers, including complaint mechanisms for users.</p>
<p><b>Question 10: What action does your service take in response to <i>reports or complaints</i>?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers, including complaint mechanisms for users.</p>
<p><b>Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which includes recommendations for online service providers to improve their trust and safety programmes.</p>
<p><b>Question 12: What automated moderation systems do you have in place around illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>

<p><b>Question 13: How do you use human moderators to identify and assess illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 15: In what instances is illegal content removed from your service?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 16: Do you use other tools to reduce the visibility and impact of illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 17: What other sanctions or disincentives do you employ against users who post illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 20: How do you support the safety and wellbeing of your users as regards illegal content?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>

<p><b>Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 23: Can you identify factors which might indicate that a service is likely to attract child users?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 26: What information do you have about the age of your users?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>
<p><b>Question 27: For purposes of transparency, what type of information is useful/not useful? Why?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>Please see the article linked in response to Q2 which surveys the trust &amp; safety programmes of online service providers.</p>

**Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?**

*Is this response confidential? – N*

Please see the article linked in response to Q2 which surveys the trust & safety programmes of online service providers.

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