

Your response

Question	Your response
<p>Question 1: How do you measure the number of users on your service?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 2: If your service comprises a part on which user-generated content is present and a part on which such content is not present, are you able to distinguish between users of these different parts of the service? If so, how do you make that distinction (including over a given period of time)?</p>	<p>Confidential – Y / N</p> <p>Pornography sites can often contain both user-generated content, and provider content side by side, with users interchangeably going between the two forms of content. Users are not able to distinguish between user-generated content or provider content.</p> <p>Ultimately, all pornographic content – whether user generated or provider-created – should be subject to the same regulations in the interests of consistency and transparency.</p>
<p>Question 3: Do you measure different segments of users on your service?</p> <ul style="list-style-type: none"> • Do you segment user measurement by different parts of your service? For example, by website vs app, by product, business unit. • Do you segment user measurement into different types of users? For example: creators, accounts holders, active users. • How much flexibility does your user measurement system have to define new or custom segments? 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 4: Do you publish any information about the number of users on your service?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

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<p>Question 5: Do you contribute any user number data to external sources/databases, or help industry measurements systems by tagging or sharing user measurement data? If not, what prevents you from doing so?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 6: Do you have evidence of functionalities that may affect how easily, quickly and widely content is disseminated on U2U services?</p> <ul style="list-style-type: none"> • Are there particular functionalities that enable content to be disseminated easily on U2U services? • Are there particular functionalities that enable content to be disseminated quickly on U2U services? • Are there particular functionalities that enable content to be disseminated widely on U2U services? • Are there particular functionalities that prevent content from being easily, quickly and widely disseminated on U2U services? 	<p>Confidential? – Y / N</p> <p>Most content on pornography sites is user-generated, and often goes through barely any moderation. This can result in pornography sites hosting illegal and harmful content, including footage of trafficking, non-consensual sexual violence, and child sexual abuse material.¹</p> <p>Once pornographic content is uploaded by a user to a site, only the most extreme and obvious illegal and non-consensual content is readily identified and reported. Most video uploads featuring trafficked and exploited individuals are camouflaged against swathes of similar-looking content, making it difficult to identify.² The New York Times reported that pornography moderators often ‘fast forward through videos, but it’s often difficult to assess whether a person is 14 or 18, or whether torture is real or fake’.³</p> <p>Further, X (previously Twitter) hosts pornographic content and illegal content which often goes unmonitored and is quickly and widely disseminated on the platform. According to internal X documents secured by Reuters in October 2022, the company estimated that adult content constitutes approximately 13% of content on X.⁴ Further, research by the Children’s Commissioner for England found that X was the online platform where young people were most likely to have seen pornography, at 41%.⁵</p>

¹ https://cease.org.uk/wp-content/uploads/2021/07/210607_CEASE_Expose_Big_Porn_Report.pdf

² https://cease.org.uk/wp-content/uploads/2021/07/210607_CEASE_Expose_Big_Porn_Report.pdf

³ <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>

⁴ <https://www.reuters.com/technology/exclusive-where-did-tweeters-go-twitter-is-losing-its-most-active-users-internal-2022-10-25/>

⁵ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf>

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	<p>This lack of regulation and moderation of user-generated content on X has also seen an increase in illegal content on the platform, including child sexual abuse material.⁶</p> <p>Barnardo’s is also concerned by platforms such as Snapchat, which allow for user-generated content to be distributed easily and quickly to a wide range of users. A recent report by Revealing Reality found that Snapchat allows for the mass distribution of harmful content which includes fights between individuals and groups; fatal injuries and stabbings; humiliation videos; weapons and drugs advertised for sale; ‘leaked’ videos of sexual activity, including of children (child sexual abuse material); and mutilation, torture and murder.⁷ In the report, children reported seeing this content every day, and sometimes multiple times a day.⁸</p> <p>Barnardo’s practitioners have shared that exploiters make use of features such as ‘Quick Add’ on Snapchat, which allow them to add a lot of people as friends (even when they are not known to the individual) at any given time. This can be used to mass-distribute harmful and illegal content to users, and to target, contact and groom children into child criminal exploitation.⁹</p>
<p>Question 7: Do you have evidence relating to the relationship between user numbers, functionalities and how easily, quickly and widely content is disseminated on U2U services?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 8: Do you have evidence of other objective and measurable factors or characteristics that may be relevant to category 1 threshold conditions?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

⁶ <https://www.theverge.com/23327809/twitter-onlyfans-child-sexual-content-problem-elon-musk>

⁷ https://revealingreality.co.uk/wp-content/uploads/2023/06/Revealing-Reality_Anti-social-Media_06-06-23.pdf

⁸ https://revealingreality.co.uk/wp-content/uploads/2023/06/Revealing-Reality_Anti-social-Media_06-06-23.pdf

⁹ <http://www.preventknifecrime.co.uk/wp-content/uploads/2022/11/Child-Criminal-Exploitation-Knife-Crime-APPG-The-Online-Safety-Bill-and-CCE-Briefing.pdf>

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<p>Question 9: Do you have evidence of factors that may affect how content that is illegal or harmful to children is disseminated on U2U services?</p> <ul style="list-style-type: none"> Are there particular functionalities that play a key role in enabling content that is illegal or harmful to children to be disseminated on U2U services? Do you have evidence relating to the relationship between user numbers, functionalities and how content that is illegal or harmful to children is disseminated on U2U services? 	<p>Confidential? – Y / N</p> <p>Child Users</p> <p>Children will be attracted to many services and platforms across the internet, and this should be the default position taken when assessing services that may contain illegal or content that is harmful to children. Ofcom’s own research has found that in 2022, almost all children lived in a household with access to the internet (97%).¹⁰</p> <p>Services that are clearly targeted towards children – such as gaming platforms – are more likely to attract child users, but sites which host adult content (such as pornography) are also accessed by millions of children per month.¹¹ Research by the British Board of Film Classification (BBFC) has found that children are coming across pornography online from as young as 7.¹² Recent research by the Children’s Commissioner for England found that 79% of children had encountered violent pornography before the age of 18, with the average age that children first see pornography as being 13 years old.¹³ Children often come across pornographic content for the first time accidentally, unwittingly searching terms like ‘sex’ or ‘porn’ without knowing what they mean.¹⁴</p> <p>Research by the Children’s Commissioner for England found that some young people had experienced seeing sexualised cartoons, depicting popular children’s characters and which appear in pop-up ads, actively grooming children to access adult pornography.¹⁵ According to research by the BBFC, almost half of the top 100 pornography sites visited carry content which feature characters from children’s cartoons or characters that children would recognise – including characters from Frozen, Scooby Doo, and The Incredibles.¹⁶</p>

¹⁰ https://www.ofcom.org.uk/_data/assets/pdf_file/0027/255852/childrens-media-use-and-attitudes-report-2023.pdf

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/541366/AV_ConsultationDCMS_20160216_Final_4_.pdf

¹² <https://www.bbfc.co.uk/about-us/news/children-see-pornography-as-young-as-seven-new-report-finds>

¹³ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf>

¹⁴ <https://www.theguardian.com/culture/2020/jan/31/porn-survey-uk-teenagers-viewing-habits-bbfc>

¹⁵ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf>

¹⁶ BBFC, 2022, ‘Non-Photographic Images of Child Sexual Abuse: BBFC Content Investigation

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	<p>Age verification and estimation for pornographic content</p> <p>Highly effective age verification and age estimation (and combined AV and AE) plays a vital role in protecting children from harmful content, including pornography.</p> <p>Age verification technologies are improving every day. They operate at scale and in a way which respects the privacy of the user, only requiring minimal information for a matter of seconds before removing a users' data. Age verification providers also operate using a 'double-blind' model – meaning that they never know which site a user visits, and the site never knows the users' identity, just that they are over the age of 18.</p> <p>Highly effective age verification and age estimation must be fully implemented in order for them to be effective in protecting children from harmful pornographic content. There is a precedent of pornography companies trying to avoid age verification legislation, particularly when guidance has been left unclear or leaves room for misinterpretation. For example, Pornhub has previously created its own VPNs to allow savvy underage users to bypass any controls put in by the Internet Service Providers.¹⁷ Pornography companies are commercially incentivised to maximise the number of users accessing their sites, including children.</p> <p>Guidance on age verification and age estimation, and the interoperability between the two, must therefore be robust and explicit as to what is expected of pornography companies and social media companies that are expected to implement highly effective age verification and age estimation technologies to protect children from pornographic content. It cannot be left at the discretion of pornography companies and social media sites.</p> <p>This guidance must be developed as swiftly as possible to protect children from pornographic content at the earliest opportunity. Barnardo's have estimated that, since the decision was taken in October 2019 not to implement Part 3 of the Digital Economy Act (which included age verification for pornographic content), it is</p>

¹⁷ <https://www.telegraph.co.uk/news/2019/04/18/porn-sites-offer-loopholes-get-around-web-ban-bbfc-admits-powerless/>

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	<p>likely that children have access pornographic content more than 54 million times.</p> <p>Other harmful content for children</p> <p>Content that can relate to child criminal exploitation can be found on user-generated sites. Child Criminal Exploitation (CCE) is when a child under the age of 18 is encouraged, expected or required to take part in any activity that constitutes a criminal offence under British law. CCE can take many forms, including ‘county lines’ (where children are coerced to carry drugs and weapons from one area to another to service complex drug supply chains), stealing or shoplifting to order, including perfumes, alcohol or cars, cannabis cultivation, and forced begging.¹⁸</p> <p>The COVID-19 pandemic and subsequent lockdowns increased and exposed the scale of online CCE. At an All-Party Parliamentary Group event on CCE and the Online Safety Bill, Barnardo’s practitioners shared how exploiters use online platforms to make initial contact with and groom children, such as by sharing posts of luxury items in trap-houses – including money, trainers and weapons – to show a ‘glamorous’ or ‘luxurious’ lifestyle.¹⁹</p> <p>Research in 2019 found that one in four (24%) of young people reported that they see illicit drugs advertised for sale on social media.²⁰ In 2020, research by the Youth Endowment Fund found that 20% of young people had seen online content promoting gang membership in the previous 12 months, and 24% of young people reported seeing content featuring carrying, using or promoting weapons.²¹ Further, recent research by Revealing Reality found that children across the UK are routinely viewing videos of illegal activity on social media, including fights, stabbings, and the sale of weapons and drugs online –</p>

¹⁸ <https://www.barnardos.org.uk/sites/default/files/2023-06/summer23-report-invisible-children-cost-living-criminal-sexual-exploitation.pdf>

¹⁹ <http://www.preventknifecrime.co.uk/wp-content/uploads/2022/11/Child-Criminal-Exploitation-Knife-Crime-APPG-The-Online-Safety-Bill-and-CCE-Briefing.pdf>

²⁰ <https://volteface.me/app/uploads/2022/09/Volteface--Social-Media-report-DM-for-Details.pdf>

²¹ <https://youthendowmentfund.org.uk/wp-content/uploads/2022/10/YEF-Children-violence-and-vulnerability-2022.pdf>

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	<p>with some children reporting that they see this type of content several times a day, every day.²²</p> <p>Further, content that is harmful to children’s mental health can be found across the internet.</p> <p>In a survey of children and young people that Barnardo’s conducted in 2022, only 33% of respondents completely agreed that they feel safe when they’re online, with 67% of respondents saying that they had seen things online that made them feel worried or scared.²³</p> <p>Our insight suggests that children and young people with additional life challenges (such as young carers and care leavers) are more susceptible to the negative impacts of social media as they are more likely to experience isolation from friends and family, or struggle to develop and maintain these relationships offline due to the possible transient or unsettled nature of their life.²⁴</p>
<p>Question 10: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2B threshold conditions?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 11: Do you have evidence of matters that affect the prevalence of content that (once the Bill takes effect) will count as search content that is illegal or harmful to children on particular search services or types of search service? For example, prevalence could refer to the proportion of content surfaced against each search term 16 that is illegal or harmful to children, but we welcome suggestions on additional definitions.</p> <ul style="list-style-type: none"> • Do you have evidence relating to the measurement of 	<p>Confidential? – Y / N</p> <p>N/A</p>

²² https://revealingreality.co.uk/wp-content/uploads/2023/06/Revealing-Reality_Anti-social-Media_06-06-23.pdf

²³ <https://cms.barnardos.org.uk/sites/default/files/2023-03/Barnardos-Your-Voice-Matters-2022-20.3.23.pdf>

²⁴ https://www.barnardos.org.uk/sites/default/files/uploads/B51140%2020886_Social%20media_Report_Final_Lo%20Res.pdf

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<p>the prevalence of content that is illegal or harmful to children on search services?</p>	
<p>Question 12: Do you have evidence relating to the number of users on search services and the level of risk of harm to individuals from search content that is illegal or harmful to children?</p> <ul style="list-style-type: none"> • Do you have evidence regarding the relationship between user numbers on search services and the prevalence of search content that is illegal or harmful to children? 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 13: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2A threshold conditions?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

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