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	Inkbunny

Your response

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?	Confidential? N That search engines filter pages with RTA or other adult rating tags in should be considered when determining whether a service is likely to be accessed by children: https://developers.google.com/search/docs/crawling-indexing/special-tags#rating – especially as for many sites search is the primary means of user acquisition. This approach appears to be being adopted in California: "The amendments provide that "reasonable steps" includes the business implementing a system that includes metadata or response headers identifying the product as sexually explicit to parental control software, embedded hardware applications, and other similar services designed to block, filter, monitor or otherwise prevent a minor's access to inappropriate online content, or that blocks users designated as minors by the operating system of the device used to access the website." https://digitaldemocracy.calmatters.org/bills/ca_202320240ab3080 [Analysis tab, Senate Standing Committee] 4.32 assumes adult services are commercial, but the relatively low cost of hosting and the dual nature of porn as art and a method of social bonding means this is an exception in the furry community. Our site runs on $10/day - it has no ads, only taking donations and offering merchandise with art of a mascot (this raises negligible income; it's more to show support). The regulations need to accommodate services running to support artistic expression that get caught up in the same law intended to cover "tube sites" just because some of the art is adult. 5.16: Many designs use "colour, cartoons, animations" but their appeal isn't unique to children. This assumption has led to negative outcomes on providers of e.g. comedy animations on YouTube that are locked down and lose attract ad revenue or comments. (Also: footnote links to ICO/NCMEC/ParentZone responses are broken.)

Question	Your response
Volume 3: The causes and impacts of online harm to children **Draft Children's Register of Risk (Section 7)**	
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. **Evidence gathering for future work:** 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)?	Judging by 7.1.14 it seems that the individuals that we usually encounter as underage (14+) are quite likely to know they can use a VPN to evade location-based age restrictions. Combined with a growing number of VPN services, which websites already struggle to deal with for spam purposes, this may render country-based IP blocks ineffective, undermining the UK age assurance regime proposed in 7.11.19. Regarding 7.10.40, Inkbunny's predicative autocomplete for keyword tagging is differentiated based on the keyword volume for similarly-rated work, with the idea that inappropriate keywords should not be suggested for General-rated work. This might be usable by other sites. For 7.12.13, as a community site we made a conscious decision to reject commercial pressure in order to remain true to our stated site philosophy, including "No one has the right to harass anyone for their tastes or the content of artwork they post on Inkbunny."and "It is not everyone else's responsibility to prevent you from seeing what you don't want to see. We provide rating, keyword and artist-based blocking to help you filter content." These statements weren't made in the context of child safety and Inkbunny recently clarified that "Advocacy of real-life paedophilia is not allowed, and such content will be removed." However, the general attitude, especially from users from the USA (which are the majority) is that free speech trumps commercial considerations. Other sites in our community have made similar decisions because payment processors demanded more than they were willing to give up as described in e.g. https://www.f-list.net/newspost/284/

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9. Have you identified risks to children from GenAI content or applications on U2U or Search services? a) Please Provide any information about any risks identified 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.	https://www.f-list.net/newspost/285/ https://www.f-list.net/newspost/359/ We do not believe we would be able to engage with payment processors on the basis of some of our users' content, undermining age assurance methods such as credit cards as well as the expectation that we would be able to fund others via commercial revenue levels. Inkbunny permits certain AI art but under restrictions designed to promote open development and safeguard artists and character owners, rather than children: https://wiki.inkbunny.net/wiki/ACP#AI Some users have suggested that AI models may have been trained in small part on child abuse imagery. It is unclear the extent to which this is the case or the impact that it may have had; but if such content were used to generate similar photo or video content, it would not be a valid submission for several reasons and so would be removed through content moderation, with appropriate action against the uploading user. One issue we faced was users identifying as "MAPs" and using flags and colours to identify themselves as interested in sharing contact details for off-site communication, as outlined in https://inkbunny.net/j/495413 Not sure if this counts as NDC but it may be worth considering. (It's also an example of iterative risk review.)
Draft Guidance on Content Harmful to Children (Section 8)	
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? 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	Confidential? – N Table 8.2.2: Our moderation team disagrees with the inclusion of a focus on the breasts or buttocks as being pornographic as they are often depicted in "arty" ways to show off a character rather than to arouse per-se, and are necessary for reference sheets. "Full frontal nudity" is also a problem without context, especially if it will be interpreted to include work which does not explicitly depict genitals. It is not reasonable to assume such work is pornographic or otherwise harmful to children. For comparison, Inkbunny's content policy states that: "Human characters are permitted in artwork, however they

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a) should consider to be harmful or b) consider not to be harmful or c) where our current proposals should be reconsidered?	must not appear in sexual situations and must not show genitals, anal details, or sexual arousal" We think that a focus on primary rather than secondary sexual characteristics is appropriate – and also fairer to women, who are likely to be disadvantaged otherwise, as "breasts" may just be seen as "chest" for men. This would permit work which we have previously deemed not sexual in nature e.g. a rear view of naked humans on a beach – while buttocks were on display, along with the rest of the backside, no anal details, genitals or arousal was depicted in the drawing. This also falls under "might be used in an advertisement" which as noted at the adult content summit requires clarification – an advertisement at a specific time? In TV or in print media? Which regulations? While we appreciate you have disclaimed "for the purposes of sexual arousal" it is very hard to determine the purpose, and in other parts of the regulations you have stated that "intent of the user posting the content" should not be the primary consideration. Moderation works best when based on definitive boundaries. In some cases we have considered the motives depicted within the work itself i.e. fictionally eating another character (vore) is allowed as long as the characters involved do not appear to enjoy it in a sexual manner, and perhaps that kind of approach might be easier to use as a basis for moderation than the artist's intent. The "primary purpose is artistic" example seems to draw an unfortunate distinction between images of art and art itself in a way similar to that depicted in https://www.reddit.com/r/calvinandhobbes/comments/6xy022/high_artlow_art/ - it is problematic for staff, because who gets to decide 'purpose' in the end – and who will pay the price if the final decision is otherwise? Regarding the mention of "furries" in the section on distinctive outfits (like nurse or police officers), you may have meant the costumes some of us wear, in which case it'd be better-cited as "fursuits": https://en.wikipedia.org/wiki/Fursuit It might be worth considering whether diapers should be mentioned within the same section. We treat them like other clothing i.e. only adult-rated if involved in sexual acts.

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	There is a significant subgroup of furries whose characters may be depicted in diapers but for whom it is not a sexual kink, i.e. as described at https://en.wikifur.com/wiki/Baby-fur – an example of related "clean" artwork being deemed "fetish-oriented": https://x.com/DrackyPoof/status/1816373908636921949 – it is possible that more such decisions will be made on child protection grounds without explicit guidance. In table 8.2.3 it may also be appropriate to include birth alongside breastfeeding, as it doesn't involve sex, just the result of it. An example of a rule from another site is "Content featuring minors is not allowed when the minor is in the presence of sexual activity, sexual objects, or nudity, though exceptions may be made for non-sexual depictions of birth and breastfeeding." https://www.furaffinity.net/aup [2.7] In table 8.8.4, would characters such as Pokemon not be included in "staged fights"? I see 8.8.7 but that is even more confusing since such fights are entertainment for their proponents – and it seems to favour commercial content, i.e. if you made up your own fictional animal fighting universe it might not be allowed. This is a concern because some users have been forced not to use characters and situations from existing popular properties by copyright-holders, so they had to make their own up which wouldn't be protected.
Volume 4: How should services assess the risk of online harms? **Governance and Accountability (Section 11)**	
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.	Confidential? – N For GA2, it is unclear in what way a responsible person should be 'named' – is this a matter of selection, or an external requirement, e.g. on a publicly accessible page? The latter may expose them to risk, although this might be ameliorated if a fan-name/nickname is valid for use. In Inkbunny's case the owner's real-life identity is known but this is not necessarily the case for all such services. GA3 (11.98 – 11.106): 'Admins' at IB are also volunteers and part of the site ethos is that any staff member can and should act on violations (collective management), with discussions for harder cases. It is not clear how this

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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?	can be squared with a requirement for individual statements of responsibility; perhaps what we have counts? "You have been appointed as a Moderator because we trust you to make decisions and act on them independently. You do not need permission from anyone to do anything as long as you are acting in accordance with these guidelines. As a Moderator you are trusted with the power to make decisions and act on them based on these rules and your own judgement. Inkbunny's software gives you the ability to do just about anything, including deleting submissions, journals and comments, banning and disabling accounts, and editing user content. With this trust and power comes a lot of responsibility. Every action you take affects users and shapes their opinion of the Moderators and Inkbunny as a whole. Your decision on any issue is considered final and will be upheld by all the other Moderators unless someone appeals to the Lead Administrator. An appeal would only be successful in exceptional circumstances." [Note: While content *can* be edited, it is not usually done except to remove violations or to fix typographic errors, i.e. moderators are not "editors" in a publication sense. There is guidance for many cases, e.g. abuse, underage users.] The concern relates to potential determination of multi-risk status as a micro site simply because personal journals or user comments may contain any type of content, including content relating to suicide or abuse, although this risk has yet to be formally evaluated. This issue could feasibly apply to a site of any size that has an ability to post content. GA5: "While costs may represent a large proportion of revenue for some of smaller services that are multi-risk, we consider them to be justified as costs scale with benefits." – it is not clear what this phrase in 11.163 is intended to mean; it is not a 'benefit' that risk of harm exists. By the same logic, the impact scales with a service's size, so a smaller operation involves less harm even if it is 'multi-risk'. The argument appears to be an abbreviation of "costs scale with benefits for the most part with service size and the number of risks" in 11.209, which lacks evidence (and has a typo: "We also leave services *have* the flexibility"). Regarding GA6, we have no employees, so we don't need a code of conduct? I guess it would be unenforcable anyway because we don't offer any payment. Many online services rely on volunteer moderators. Regarding AA1-4, with reference to PCU H2.2, some care with interpreting "principal purpose" may be required.

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	Inkbunny is described as a "furry art community" for which accounts are restricted to adults, rather than a furry porn site. We have a lot of clean art as well. Art that is popular is automatically highlighted. Much of it is pornographic simply because adults find porn to be appealing (though this is not visible unless appropriate ratings are first enabled, even if a user is registered). But we don't focus on porn as the purpose of the site. The same is similar for sites such as Fur Affinity, SoFurry and Weasyl – they're art communities first and foremost. Regarding SM1, "When Primary Priority Content has been identified, downrank and/or blur the search content" appears to seek to impose an inappropriate burden on all such content; it should only apply when there is a reason to believe that a child is viewing it, or not apply if an adult is – otherwise it's just anti-porn/censorship. That's what SafeSearch is for – adults can use it, too. To be specific, pornography should not be required to be downranked or blurred in all search services – like SM1 b), it's not "appropriate" to do so in all cases / by default.
Children's Risk Assessment Guidance and Children's Risk Profiles' (Section 12)	
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	Confidential? – N The graphic on p46 of Vol4 has "children's access assessment" again when it probably means "risk assessment". Table 12.2 is hard to read vertically; the concepts may be better represented in a non-tabular paragraph format. It took looking in here to find that "high" and "medium" impact were in large part based on the number of UK children accessing the site – and that "medium" was set at 100,000 of them, which I'd say is more than we would have by a factor of ~100. If that'd been clearly put elsewhere I might have less worried about being medium multi-risk (or potentially any-risk, given our relatively limited traffic, though obviously there are other factors). 12.63: An adult content site is unlikely to have asked people's specific dates of birth and it is generally recommended to children not to provide such information online, so it's not clear that the expectation to have or to be able to obtain child-age information can reasonably

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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 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.	be met. Children will lie on a survey because they think it'll be used to kick them off the site (as we'd like to do). That said, when we occasionally do find kids sneaking on, it tends 14+, avg. 15-16; that's when some get into the fandom and looking for furry content, as opposed to just being online. In the USA fans arrive from a younger age, as most UK furry events are 18+, or at least 16+, reducing risk. [https://en.wikifur.com/FurryConventionMap.html; compare "Open to all ages" vs. "Age-restricted" option.] 12.65/66 It is not necessarily the case that a community art site will have a separate content moderation system. Rather, such sites often operate on a basis of privileged users being able to act as if they were the owner of a particular item of content and/or access special modes (such as to lock a work in a hidden state). This is easier to code, but it means that the level of reporting and insight into moderation actions is limited, and what is there may be descriptive (text notes), not quantitative. Changing this may involve significant time/money investment, depending on the required outputs, or technical abilities that they do not have (e.g. if open-source was used).
Volume 5 – What should services do to mitigate the risk of online harms **Our proposals for the Children's Safety Codes (Section 13)**	
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	Confidential? – N We currently employ the RTA tag to reduce the visibility of the site for untargeted queries in search engines, and to trigger parental controls and educational filters. We consider this to be effective in reducing the number of children accessing the site, especially for queries by younger children for game and cartoon properties that are the subject of artistic and pornographic depictions – it is present on all pages, so that the former do not encourage children to join and see the latter. However, we do not have specific evidence for effectiveness (other than that people sometimes wonder why their Inkbunny profiles are not visible/more popular in search, compared to competing sites) because we launched with this

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such measures, including any results 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.	feature, and in line with Ofcom's proposals have not removed it even though it impacted adult visibility as well.

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?	Confidential? – N The definition of "multi-risk" is complicated because as mentioned elsewhere there are always risks, it's a matter of whether the level of risk of harm is significant. If a site occasionally has suicide-related content, unlinked to children, is that enough of a risk to be considered "multi-risk" for that in combination with other factors? In practice, almost all sites that allow any communications function could be determined to be "multi-risk", as well as those allowing the posting of fantasy artwork since some of this is likely to include violence, even if not combined with sex (Inkbunny rates these separately with default access essentially in line with the Safety Code and Act: some violence shown by default, but no explicit nudity. Like determining upfront whether a service is large, it's important to state as clearly as possible the breakpoints such as 100,000 UK children that you have in mind to measure impact, so as to save time and alleviate the worry of people running services for relatively small communities. Many will not have *anywhere near* this "relatively small" number of UK children accessing them, and can therefore focus on the lower level of duties for all sites, and any required for PPC. This may save Ofcom time in processing queries from such services, allowing it to focus on the risk of significant harms posed by larger services that are able to devote resources to fixing them.
Age assurance measures (Section 15)	
31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures	Confidential? – NGiven limitations in checking IDs online, it should be acceptable to defer to the decision of a third-party known to perform such checks. For example, if a user controls accounts belonging to a persistent identity of a certain username, within a community where

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? b) In this case, are there alternative approaches to age assurance which would be better suited? 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?	such names are unique (or accompanied by unique pictures), it should be sufficient to check that the same name is present on a list of those at an 18+ event known to check photo IDs. In our own consultation, users expressed strong aversion to giving out IDs online, e.g. “I *would not* want to submit any government ID to *any* website unless it was to a government website” -- “I wouldn't do any form of verification at all linked to this site. I cannot stress this enough I am extremely uncomfortable with my ID being linked to this site. That includes secure third parties that will end up being set up this on other sites. As data leaks happen. If it came to it I would say ban UK IPs, enough people know how to use VPNs and move the site to a different county.” -- “I know you didn't make the law, but it I were to be forced to provide my ID to any adult website, that would stop using that site altogether.” -- “I would not be comfortable providing ID on a site that whilst I'm sure you can assure is perfectly safe from a technical/security perspective, is otherwise in such a grey area betwixt communities. The risk is just too great for that for me to want to associate my real life identity with my online persona on here.” -- “When I first heard about UK's new rule, what had come to mind was what happened to the French comic magazine publishing company, Charley Hebdo in 2015.” -- “I would never want my ID to be linked to my account. I have done art of things I would never want people around me to know about. Hacks and leaks happen, I mean, just look at the Ashley Madison scandal. People's lives can be destroyed.” As the duties relate to UK children it should be clear that it’s possible to use reasonable means to identify UK traffic (e.g. GeoIP2 is claimed to be 99.8% accurate on a per-country basis: https://support.maxmind.com/hc/en-us/articles/4407630607131-Geolocation-Accuracy). The means employed should be in relation to the capabilities of the site in accordance with the relevant claws in the Act, i.e. it may be reasonable to use a free alternative if the commercial option would be ~10% of the site’s total budget, even if the country accuracy is slightly lower. On Inkbunny, content recommendations are given upon starring (+fav) a work, which requires an account and for the feature not to be disabled. It should be enough for

	this area that either users cannot create accounts or that enabling recommendations does not work until verified. One issue that will significantly impact us if determined that age assurance is required is the large number of legacy accounts that will need checking ; both from a cost standpoint – we estimate it'd take over half the site's annual budget of ~$3600 to verify active UK users – and in terms of disruption to users and staff. This will detract from our ability to check new accounts, making it more likely that users will find a way around the checks. When consulting users, it was suggested that there should be an account age beyond which it can be assumed that the user is now adult, even if they were not at the time of registration. We feel that ten years is reasonable, bearing in mind that phone/tablet availability was not as widespread a decade ago. We have not found users aged 7 or below, or close to that, in existing checks triggered by user reports (14+ is more common). This might be feasible to do with confirmation of use of older third-party sites within our community as well. It is unclear why the UK does not simply provide a public age verification API as it has access to the necessary data and this would greatly ease adoption of the regulations. Users suggested something similar: "what they need to anonymize this stuff is an API using open standards run not by some profit-seeking company, kind of like how lets encrypt is now everywhere even though no one pays for it... so someone like the EFF or American Civil Liberties Union - certainly not Microsoft. You create a login at said site, and when you go to another site (say Inkbunny), you login once and it makes a GET request that returns true." MyGovScot has something similar in https://docs.gossinteractive.com/article/7180/Search-Citizen-Details (with NEC cards) and Ofcom would be in a perfect position to communicate the availability of APIs.
Content moderation U2U (Section 16)	
36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	Confidential? – N Regarding 16.57 (privacy implications of moderation), we propose that users may in some cases have an expecta-

37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes? a) Please provide any arguments and supporting evidence.	tion of privacy which is not necessarily met without a notice. Inkbunny gives notices on "Private messages" and "private/friends-only content" along the following lines: **(On private message pages): "**Note: Moderators have access to your Private Messages. We also do not guarantee these messages are secure. Use at your own risk. For more info see the Privacy Policy." (On private content): "Friends and Staff Only**"** **(When setting content private): "**Friends Only - Only allow my Friends to see this submission. Only users you have allowed to be your Friends and staff will have access." ("Guest-blocked" content): "Block Guests from seeing this submission. Guests are visitors who have not signed up for an Inkbunny account." These communicate privacy expectations, including to any children who may have joined regardless of policy.
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 questions	Confidential? – N Regarding 40), Google offers many ways to force SafeSearch to be on and offers a comprehensive page for doing so at https://support.google.com/websearch/answer/186669 Inkbunny is largely invisible in search unless searched for explicitly, because use of the RTA tag results in this kind of exclusion from SafeSearch results. This reduces the risk of children stumbling across adult-only sites and may help to explain why age reports are rare (<1 / month).

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?	

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 arguments and supporting evidence. b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please	Confidential? – N 18.109 assumes that increased reports correlates to proportionately increased benefits, an argument made using similar language elsewhere in these regulations. However, the actual result in many cases is likely to be duplicate reports, resulting in negative benefits. It may be possible to address this via improved support systems/technology but this cost and the ability of smaller service providers to pay it should be considered when assessing whether they have taken reasonable steps to fulfil UR2. (We already offer a support ticket form, or email support for non-registered users/concerned individuals.) With regards to UR3(a), Inkbunny is an all-volunteer service and therefore we cannot *guarantee* the time in which a specific complaint or type of complaint will be addressed. Our moderator agreement states explicitly: "As this is a volunteer position, you are under no obligation to perform any duties or work, or any minimum amount of work. We will be grateful if you can perform the duties outlined in this document whenever you have the time." This is echoed in 2024 recruitment: https://inkbunny.net/j/512666 This reflects the reality that some days or weeks are busier than others for volunteers, and also that some complaints are more complex than others. The proposed 48 hours is a fair target for urgent complaints, given resource restrictions. As with age verification, we do not have £2,000 in revenue to spend on automation, but we may be able to give a rough

signpost to the relevant parts of your prior response. 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)? a) Please provide any arguments and supporting evidence.	timeline in cases where there's no immediate solution (i.e. it has to be discussed or researched). UR3(b) is easier to meet, as it is basically a new wiki page, plus telling people the result (which we usually already do, while considering the requirements of user privacy). 18.183: Agreed, we don't really get complainants that are so distressed they do not want to be informed of the result. 18.191: It should be understood that the service may keep removed content technically on the servers in order to be able to reverse a decision for a reasonable period. (In our case, content removed can currently be restored within 90 days, unless it is believed to be illegal or very clearly off-topic; it may also be locked hidden for revision.) This section also falls under the "really small sites may also be multi-risk depending on how you define it while lacking the resources you expect them to have" issue. That said, we have used hashlists before (they never trigged because it's not the kind of content uploaded, i.e. art). Note also that server hosting providers may make their own decisions that can overrule services and make it infeasible to restore work if their decision differs from that of the site administration. Complaints (or queries) regarding UR4 (d)-like matters usually take place at a high level already as it's a legal matter. However, because of this they may take significant time. 18.271: As covered previously we do not support the recommendation to downrank or blur pornography where it is reasonably believed that the user is adult and they have not chosen to have "safe search" (especially if it was disabled). Inkbunny does not itself run a general search service, but it may be negatively impacted as it responsibly declares itself to be for adults through use of a search-engine-recognised RTA tag. This adds a perverse incentive *not* to make such a declaration; such sites may gain traffic as a result. 18.311 c): The more support channels we have to monitor, the harder it'll be to deal with issues in an effective and timely manner, at least at our size. We already have people contacting us via social media rather than the ticket system.

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.	Confidential? – N 19.17 with reference to PCU D3.1 (TS2): I think this is aimed more at 13+ sites, but there's a difference between "permitted to use" a service and the likelihood that children may nonetheless attempt to use it, or actually do so. Inkbunny is for adults; it says so clearly both when signing up or when attempting to change rating when not signed up. If it is determined that children might nonetheless use the site in a limited capacity, such as browsing without being logged-in, it seems excessive to impose a duty to accommodate them by rewriting and illustrating the other terms in a child-friendly manner. What may be feasible is to create a separate page on our wiki relating to duties relating to children, or at least what adults can do if they think a child is on Inkbunny, and incorporate them in the existing site terms as a link, as we do for the site philosophy, content and keyword policies. This'd be as accessible on a technical basis as recent versions of Wikipedia – probably more than our main site – and likewise more readable, if people bother.
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 is relevant to your response here, please signpost	Confidential? – N Inkbunny's Popular search (which also powers the front page Popular section) selects from content most-viewed by registered users in the last three days that the user's rating filter, keyword and artist blocks, and guest blocks set by the uploader allow them to see. Keyword and artist blocks can only be set by registered users, while guest blocks apply to all non-logged-in users and is set by default for work which is sexually Mature (nudity exposing details of breasts or genitals) or Adult for sexual situations and strong violence (blood/severe injury/death). This is also the default rating filter for all users. As such, if children do visit the site despite search filtering and

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.	the RTA tag's presence, they are likely to experience the regime specified by RS1-2 if using the Popular feed/page. The only other content recommender system applies when starring a work as a favourite, based largely on work that is liked by those favouriting the same work and is in line with its keywords, accounting for the user's blocks. This also filters based on rating, only recommending work equal to or less than the current rating for the separate Sexual and Violence rating gradients. This level of filtering was not trivial but should be achievable for sites sophisticated enough to offer such a feature, as long as they capture/apply relevant rating information. We agree with the carve-out for bullying PC, as cartoon bullying is common and not associated in the minds of users with violence unless it gets to the physical level. This leads on to the issue with recommending all PC to be down-ranked. Self-harm and suicide are included under violence, as is severe injury. Abusive/hateful material has limits sitewide – but those limits are set for adults, not children, and the content may not be rated as sexual or violent, although it may be keyworded. It is possible that the limits are sufficient, but aspects such as gender identity activist overreach are occasional topics (as elsewhere) and regular users are expected and encouraged to register to employ the other filtering methods available to them to avoid such work (artist/keyword). These features are available to any child who did register now, and perhaps it should be considered that sites may already offer features adequate for children to control their own feeds – in which case it may be better to focus on explaining those features in a way that children understand and ensuring accessibility, even if they are not *wanted* as registered users and will be removed if found. Depressive and body-image content is also not rated or required to be keyworded; without such rating it is going to be quite hard to identify such work in a decade-and-a-half content backlog (one goal of our recommendation system is surfacing older works to encourage interaction with artists who may not be currently active). One semi-regular meme within the community hints at both of these, illustrating a human depiction of the artist or commissioner facing a mirror in which they see a depiction of their fursona (anthropomorphic animal avatar) e.g.

	https://inkbunny.net/s/1279139 or https://www.furaffinity.net/view/50307271/ While having an unachievable ideal self may be correlated with mental health issues, research summarised at https://furscience.com/research-findings/fursonas/3-12-fursona-as-ideal-self/ shows that most such representations have positive aspects for mental health as long as the differences between reality and fantasy are not *too* distant (species isn't the key issue here; rather, the furry character is a way of idealising a more perfect self). This also touches on the protected characteristic of gender identity, as in many cases the character in the mirror is a different sex: https://inkbunny.net/s/2985491 – we hope it is not Ofcom's intent to say that a picture accompanied by text along the lines of "I wish I were this girl/guy" is depressive/body image content that should be hidden. (This image also illustrates the difficulty in applying "full frontal nudity" to furry characters; we General-rate this as no distinctive features are visible.) As a practical matter, the ~£18,000 to implement PC recommendation down-ranking is exactly five years of our estimated annual budget/max revenue. Hopefully we will find that we're not actually medium/high risk for PC. RS3 is probably better/most cheaply approached for us as a route to identify keywords that the user wishes to add to their blocklist – though to do that currently they have to register, which children aren't meant to do. This might be an option to suggest for smaller services.
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	Confidential? – N We agree with all recommendations and do US2 and US3 already, US4 seems useful even if not multi-risk and we already offer to block when deleting content or refusing content keyword suggestions. They are useful for users of any age, including an adults-only site.

to the relevant parts of your prior response.	
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 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.	Confidential? – Y / N

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?	Confidential? – N Most measures seem proportionate as long as there's flexibility about the means and timeline by which they're implemented, and realistic expectations about the quality of evidence that a *very* micro business (run more like a charity or CIC) is able to provide to justify its decisions. AA3 will be a hard nut to crack. Not only is funding an issue, for which we suspect the cost is an underestimate at our size, many of our users have said they *will not* give their ID or show their face to be identified as a member (see response to Section 15/Question 31). This is not unique to us – furries in general are a stigmatised group, and to an extent this is true of related groups e.g. anime: https://furscience.com/research-findings/disclosure-stigma-bullying/10-2-experienced-stigma/ - but as our audience is adult (not 13+) we allow content that other sites in our community don't, thus increasing the stigma, and making it hard to use payment processing services. We appreciate you have limited discretion over this, so we request that you exhibit the maximum flexibility in the means accepted to implement this requirement, as outlined by some of our ideas in the respective section. We also repeat the representations made by others that the RTA tag is an effective means of greatly *reducing* the risk to children, and it should be considered whether it (alone or in combination with factors such as mobile/ISP blocks) is a) a sufficient means of age estimation or b) a separate-but-equal option that should be recommended by Ofcom for the amendment of primary legislation, as well as c) a factor which plays into estimation of impact to children. This measure seems likely to become more of a standard due to California's AB 3080: The Parent's Accountability and Child Protection Act, the current text including "metadata or response headers identifying the product as sexually explicit to parental control software, embedded hardware applications, and other similar services designed to block, filter, monitor, or otherwise prevent a minor's access to inappropriate online content."

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.	Confidential? – N Yes, given the hand you have been dealt, although it will be hard to judge their full impact ahead of time. The caveat here is 24.4 (e) & (f) with regard to the use of 'device-based' technologies, as promoting use of these might be a more effective way of reducing the exposure of children to content designated as harmful to them while reducing the cost and impact on sites and users.
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 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.	Confidential? – N Regarding Welsh, it might be feasible for larger sites to provide information designed especially for children in Welsh as well as English. Without this, Welsh-speaking children may be at a disadvantage. I'd say this could be done via a translation link by all services, but I tried and it didn't work on Google, possibly because they block the translation of RTA-tagged sites or known adult domains.

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