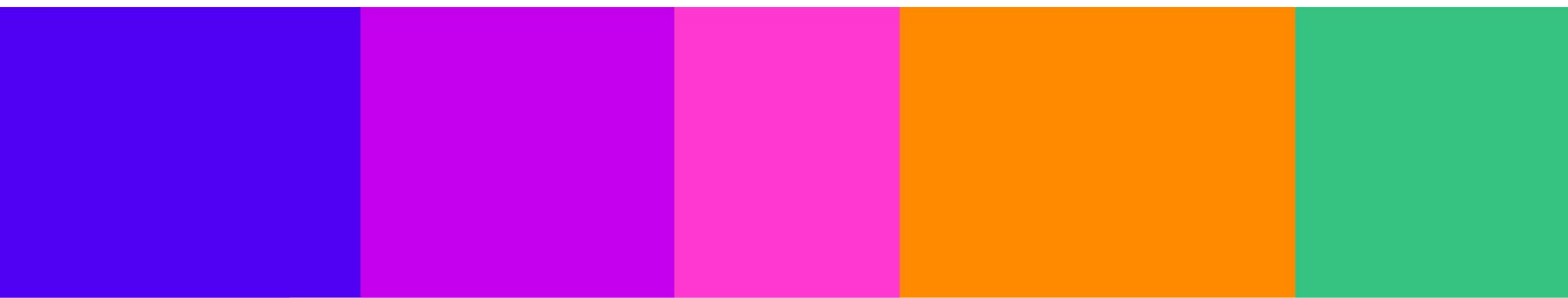# Consultation response form

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

Consultation title	Consultation: Protecting children from harms online

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?	A brief response to this consultation I don't have time to go through it. Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com You are basically enforcing the mass uploading of passport/facial data for every person living in the UK to ID providers such as Apple, Microsoft, Google, Facebook, Twitter etc and/or to multiple other vendors, who will store the data in multiple worldwide locations in multiple jurisdictions this includes children. This will mean the total cession of democratic expression, the death of activists living in the UK, persecution of nonconforming minorities in the UK and returning or visiting other countries, and the blackmail of armed forces personnel and mass fraud using ID papers so collected. Every single keystoke will then be tracked, this is dangerous in particular to children who will be blackmailed in later years. Until such time as you can mandate over 18 checks via an assured ID provider with democratic controls over data release, the proposal is, frankly, lunatic. Seems to be an assumption that users have an account to use services, many services do not require an account and do not have the financial ability to provide or access the necessary infrastructure. OFCOM cannot implement any of this until it can be assured of privacy and security of users, this is impossible for reasons given here. I remain stunned that an organisation such as OFCOM has such poor understanding of the internet and the implications of these lunatic proposals.

Question	Your response
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. **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)? 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	Confidential? – N **User ID** The greatest risk to children is age assurance, which will ensure every single typestroke, mouse click, activity and opinion will follow them around until the day the die, this must be formally listed as a risk to children (and adults) Forcing provision of ID means their location and address are well known and can be harassed, killed, blackmailed by bad actors. As the collection and storage of ID is OUTSIDE UK jurisdiction there are, and can never be, enforceable protections. You should NEVER be asking children to provide ID who do not understand the consequences of their actions. I fail to understand why such very basic understandings are missing, or why this needs explaining, you should not be proceeding until you at least understand the basics of how the internet works before very serious damage is done to UK residents and society in general. You are basically stating that every UK resident must create an account for every service of the 1000s of web sites visited, most of which will have at least some uncomfortable content such as war, injury, death etc. It seems unlikely that every single web site in the world is going to abide by every single regulation in every single country, so you are expecting each site, worldwide (accessed from the UK which is most) to obey UK Law, a serious case of imperial overreach. The UK is no longer an imperial power, it does not control the planet, and most sites have another 140+ countries that could also decide to roll out their very own set of laws. Other jurisdictions are not proposing this, as frankly, they have more common sense.

Question	Your response
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.	The law should never be brought into disrepute by the implementation of dangerous and unenforceable legislation such as this. To enforce the removal of all content listed in Table 7.1 will require mass user ID uploads. It is dangerous in particular as it is very subjective as to what is harmful, most movies on Netflix, Amazon or the BBC would fall foul of this extremely broad approach. It is particularly concerning that sensible debates around immigration, religion, sexual issues would effectively be banned or taken down out of prudence by providers – what constitutes hate speech, transphobia etc is very difficult to define and what I acceptable is determined by the politics of the government and whatever the political fashion is, as has been seen recently with the trans debate where we have gone from selfID is a right to an attack on women – without debate this sort of issue cannot be resolved, this is not an online harm, it is an online truth, the wide range of vaguely stated harms gives far too much power to the censor. As the UK government cannot regulate the internet, these proposals are unworkable and will do more harm than good as children or others will simply find ways to access content in other jurisdictions, or from providers who are unsanctionable. See: https://stoptheonlinesafetybill.wordpress.com
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?	Confidential? – N Agree: No See response to Question 4 and: https://stoptheonlinesafetybill.wordpress.com The Section 8 list is basically a ban on all reasonable debate or access to same by everybody under 18 and probably everybody else. Wholly incompatible with a democratic system.

Question	Your response
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?	From 1945 to now we seem to have gone full circle, and now consider authoritarian thought control to be acceptable and normal, and in fact desirable. Children need to have reasonable access to negative and hateful speech etc, the world is not a nice place and they must learn to deal with it, not live is some sort of fantasy world where everything is sanitised and "protected"

d: 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. 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?	Confidential? – N Agree: No See response to Question 4 and: https://stoptheonlinesafetybill.wordpress.com It doesn't matter whether I agree or not, how are you intending to contact millions of web sites and demand that the fill a UK based form out? This isn't the DVLA or a dental appointment. Many small sites will shut down due to the fear of prosecution and fines. I run a small history site, some of the images displayed and attitudes expressed by persons quoted of that time are racist, and anti-semitic, and sexist. This is important for our understanding of these issues, but I will have to shut down the day this legislation is enforced. The people who run many political sites – environmental, migration, gay, dissenters in other countries are not going to want to give their names to the UK government or anybody else. You seem to believe the internet is some sort of branch of the UK Civil Service – people have good grounds for anonymity, the loss of which could have fatal consequences for them and their families – again I am just flabbergasted at the sheer naivety of the suggestions made. See:

Question	Your response
	https://stoptheonlinesafetybill.wordpress.com

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 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	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com See response to Question 4 and: look forward with interest to your proposals to block children from visiting the living room when the parents are watching Netflix and Amazon – personal trackers? Cameras pointing at the living room to spot offenders? The criteria way, way too broad, a catchall for anything at all negative, offensive, sexual. Perhaps we should put covers on table legs lest the ladies are offended. If you want to restrict content you need to be very specific and minimalist, this is a spreadshot, shutdown everything unless allowed. Please explain how you intend providers block each and every image, movie, film with any mention of above without imposing colossal costs which will be passed on to customers who now can be charged as they have been forced to give their true identities, backed with government IDs?

Question	Your response
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.	

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 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.	Confidential? – N Agree: No See above and: https://stoptheonlinesafetybill.wordpress.com Large companies can be fined etc, but most illegal and inappropriate content will be found elsewhere where no such accountability exists. No enforcement or blocking mechanism is proposed other than fines, payable only by trackable organisations. The only way to enforce any of this is to create a massive firewall around the UK with government sanctioned access only permitted, with each access signed off by a government department after a formal application. This will cost billions and cannot work. China and Russia will be happy to assist with this, both of whom have considerable expertise in this area. If you are not prepared to accept the logical results of your proposals, then withdraw them.

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 Agree: No See response to Question 4 and: https://stoptheonlinesafetybill.wordpress.com Since the UK government does not control the planet, has no intention of putting in a great firewall of the UK, we can safely say that effectiveness will be worse than zero as children's data is subject to state sanctioned snatching. Age assurance see above responses. I have no idea what large or small services means in this context or how it can be assessed. Most access is anonymous to services and the number of hits, who by and from which countries is generally difficult. Why target 7m users? How to divide it? Is a blog on Wordpress one small service or one large service for all blogs? Seems to me this is attempting to target Facebook in all but name rather than looking at where harm is actually caused. In one section it is stated services with over 7m UK users and other that the user base doesn't matter, confused. Good luck identifying the millions of sites worldwide and enforcing your writ on 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 AA1-6? Please provide any information or evidence to support your views.	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com There are two ways of implementing age assurance:

a) Are there any cases in which HEAA may not be appropriate and proportionate?	1/ Let the provider decide and Ofsted approves it.
b) In this case, are there alternative approaches to age assurance which would be better suited?	Generally this will mean storing ID outside UK jurisdiction, and evaluated by OFSTED which has no technical or legal competence (very obviously) to assess the risks as listed above. Generally, this will be available by T&Cs to our "partners" who will include foreign spy agencies. MULTIPLE uploads will be required to Google, MS, Facebook, Instagram, local IDs etc etc, meaning highly sensitive biometric and national ID will be available to 10,000s of employees of these firms and their partners.
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?	2/ ID is stored in UK specific, government-controlled database. This will be very expensive as each and every website, worldwide, will need to write UK specific code to access it, this cost will be passed on to customers, further, the government of the day will have access and can use it to compromise rivals.
34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services?	Both possibilities will be catastrophic in outcome for democracy, crime rates, blackmail and fraud. I am struggling to understand how OFSTED understands so little about this and is continuing to pursue this course.
a) Please provide any supporting information or evidence in support of your views.	My suggestion is simply to suspend it until such time as these issues can be resolved, which they can't be currently. Anonymous ID verification is possible, but not widely adopted as sites want your data and it is worth millions, so why pay for a third party site which cant be trusted and outside UK Jurisdiction?
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?	See: https://stoptheonlinesafetybill.wordpress.com

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
	Agree: No
	See:
	https://stoptheonlinesafetybill.wordpress.com
37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes?	"Volunteers" does not sound to me like a set of people who have been suitably vetted, interviewed and assessed, but more of a self-selected group of religious or other zealots who will force their worldview on the rest
a) Please provide any arguments and supporting evidence.	

	of us, and have a state sanctioned right to access other people's data and violate their privacy. Dangerous and stupid.
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 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?	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com Many search services specifically provide for anonymous searching of content to protect activists from government and employer reprisals. Any political campaigning will be accessible to both with severe consequences for the individuals who will get tap on the shoulder before they even try to protest, and sackings of all those who do not conform to the views of above. If the UK is to ban anonymous search services then public and private life become one, everybody will learn to remain stumm, expect an epidemic of suicides and no one even dare search for help as each and every search will be visible to all, as we all need to be identified before using these service, – the commercial ones will of course be happy to oblige as the collected data is worth billions.

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 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)?	Confidential? – N Agree: No See response to Question 4 and: https://stoptheonlinesafetybill.wordpress.com

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.	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com
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 to the relevant parts of your prior response.	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com

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.	
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 Agree: No See: https://stoptheonlinesafetybill.wordpress.com

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? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com

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 Agree: No See: https://stoptheonlinesafetybill.wordpress.com If you consider the forced uploading and identification of all UK residents' IDs and biometrics, exposure of data they had considered anonymous to respectable organisations such as porno sites, Facebook, Google, Twitter and MS and the blocking of accounts where owners refuse to be forced to give details to be proportionate, including children who cannot legally give consent, then I rest my case.
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 Agree: No See: https://stoptheonlinesafetybill.wordpress.com
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?	Confidential? – N Agree: No See: https://stoptheonlinesafetybill.wordpress.com The proposals have a very NEGATIVE impact on a number of groups who will be forced to publish their details on internet and to OFCOM, placing them and their families in danger of retribution from foreign governments, UK government, rich investors wanting to shut down protest to proposals, people that hold views different to the current government.

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.	Deeply dangerous and irresponsible, people will be murdered if this is implemented.

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