



# Consultation response form

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

<b>Consultation title</b>	Consultation: Protecting children from harms online
<b>Organisation name</b>	REPHRAIN

Our full response can be found below.

## Your response

Question	Your response
<p><b>Volume 2: Identifying the services children are using Children’s Access Assessments (Section 4).</b></p>	
<p><b>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.</b></p> <p>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?</p> <p>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?</p> <p>3. Our proposed approach to the process for children’s access assessments?</p>	<p>Confidential? – N</p> <p>1. Understanding how children might adapt to circumvent such measures as age assurance is crucial, yet there is a notable lack of reference to potential reactions, adaptive behaviours and unintended consequences. This includes harms migrating to less regulated areas of the internet such as the dark web. Conducting research to understand how children might navigate around such policies can provide valuable insights into these adaptive strategies. It is important to note that many platforms, including gaming platforms, possess this data, allowing for collection in a non-intrusive manner.</p>
<p><b>Volume 3: The causes and impacts of online harm to children Draft Children’s Register of Risk (Section 7)</b></p>	
<p><b>Proposed approach:</b></p>	<p>Confidential? – N</p>

Question	Your response
<p>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.</p> <p>a. Do you think we have missed anything important in our analysis?</p> <p>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.</p> <p>6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer.</p> <p>7. Do you have any views on our interpretation of non-designated content or our approach to identifying non-designated con-</p>	<p><b>4. The assessment focuses only upon <i>content</i>, yet the evidence is clear that harms are often caused through <i>contact</i>.</b> In Ofcom’s definition, content comprises only text and images, meaning the harmful behaviours of other social agents are not accounted for within Ofcom’s assessment.</p> <p>Please refer to the latest review produced by the UKCIS Evidence Group Members (Bryce, Davidson and Livingstone) on behalf of the NSPCC.<sup>1</sup> This review builds upon and compares the EG Group review commissioned by the DCMS in 2017 to inform the OSA.<sup>2</sup> The evidence suggests that children are likely to be increasingly at risk of contact harms, particularly in VR environments.</p> <p>Additionally, we concluded that there is a need for more research examining the prevalence, experience and impacts of children’s exposure to online risk and harm in the UK. Development of robust measures and datasets as close as possible to the enactment of the Online Safety Act is essential and should be a priority for policymakers and researchers. Data should be collected using a systematic and longitudinal methodology to allow for an examination of trends over time, alongside more powerful statistical analyses of the relationships between the measured variables.<sup>3</sup> Ofcom must consult with independent experts in online harms (not just media literacy) through UKCIS or similar.</p> <p>Ofcom should consider the full range of risks and harms that we set out in our publication undertaken for them to inform the development of guidance for VSPs in 2019.<sup>4</sup> Contact harms are absent from this consultation.</p> <p><b>By only accounting for content, Ofcom fail to recognise the potential for harm in non-web-based online environments such as social virtual reality (VR).</b> Neglecting to consider social VR environments is a pattern that emerges throughout Ofcom’s publications. For example, ‘How people are harmed online’ (September 2022) and ‘Protecting people from illegal harms online’ (March 2024) do not account for some harms that are witnessed in social VR. Glasgow SPRITE+, which REPHRAIN researchers Mohamed Khamis, Mark McGill and Cristina Fiani are part of,</p>

<sup>1</sup> “Online risks to children: evidence review”, NSPCC, accessed 12<sup>th</sup> July 2024, [https://learning.nspcc.org.uk/research-resources/2023/Online-risks-to-children-evidence-review?trk=public\\_post\\_comment-text](https://learning.nspcc.org.uk/research-resources/2023/Online-risks-to-children-evidence-review?trk=public_post_comment-text).

<sup>2</sup> “Children’s online activities, risks and safety: A literature review by the UKCCIS Evidence Group”, GOV.UK, accessed 12<sup>th</sup> July 2024, <https://www.gov.uk/government/publications/childrens-online-activities-risks-and-safety-a-literature-review-by-the-ukccis-evidence-group>.

<sup>3</sup> “Online risks to children”, NSPCC.

<sup>4</sup> “Research on Protection of Minors: A Literature Review and Interconnected Frameworks”, Institute for Connected Communities, accessed 12<sup>th</sup> July 2024 <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/216479-vsp-harm-guidance/associated-documents/secondary-documents/uel-report-protection-of-minors.pdf>.

Question	Your response
<p>tent? Please provide evidence to support your answer.</p> <p><b>Evidence gathering for future work:</b></p> <p>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)?</p> <p>9. Have you identified risks to children from GenAI content or applications on U2U or Search services?</p> <p>a) Please Provide any information about any risks identified</p> <p>10. Do you have any specific evidence relevant to our assessment of body image content and depressive content as kinds of non-designated?</p>	<p>touched on this point in their response to the ‘Protecting people from illegal harms online’ consultation (in response to question 1.i. and 20.i).</p> <p>REPHRAIN’s ‘White Paper: the Metaverse and the Web 3.0’ summarises some of the research that academics have been working on in the field of VR.<sup>5</sup> For instance, Fiani, Saeghe, Khamis and McGill discuss the extent of children’s use of VR (47% of children under 13 in the study had used social VR in the previous two weeks), the frequency with which children experience harassment and abuse, and parental and non-parental concerns about children’s use of social VR.<sup>6</sup></p> <p>Using focus groups with children, recent research from Davidson and Martellozzo found that VR environments present psychological and physical risks and the potential for harm, and that there is a need for stronger age verification and safety by design.<sup>7</sup></p> <p>Beyond REPHRAIN, organisations like the NSPCC have reported on the risks to child safety in VR environments, especially in relation to the experience of sexual assault.<sup>8</sup></p> <p>4. (continued)</p> <p>Mental health issues are often framed as being caused by online harms, but Ofcom must consider that in recent years, this cannot be separated from increases in childhood poverty, a reduction in living standards, and the impact of the COVID-19 pandemic. The extent of influence of each of these factors on the rise of childhood mental health problems is unknown, and this is before considering any changes to diagnostic criteria. If children are in supportive environments and feel comfortable talking to parents/guardians about any online harms they might have perceived, there is a ‘psychological buffer’, and the damage is likely to be lessened. Whether online or offline, children will always witness instances which have the potential to do harm, but what is important is developing the psychological resilience to deal with it. We cannot disentangle offline and online life anymore.</p> <p>6. We broadly agree with Ofcom’s age groupings for risk assessment. As reported, the nature of harms change across age, depending on a</p>

<sup>5</sup> Aydin Abadi *et al*, “REPHRAIN White Paper: the Metaverse and Web 3.0”, (research report, 2023) pp. 1-16, <https://bpb-eu-w2.wpmucdn.com/blogs.bristol.ac.uk/dist/1/670/files/2023/05/REPHRAIN-White-Paper-Metaverse-and-Web-3.pdf>.

<sup>6</sup> Cristina Fiani *et al*, “Exploring the Perspectives of Social VR-Aware Non-Parent Adults and Parents on Children’s Use of Social Virtual Reality”, *Proceedings of the ACM on Human-Computer Interaction*, 8, CSCW1 (2024): pp. 1-25, <https://doi.org/10.1145/3652867>.

<sup>7</sup> Julia Davidson *et al*, “VIRRAC Toolkit Report: Virtual Reality Risks Against Children” (project report, University of East London, 2024): pp. 1-25, <https://repository.uel.ac.uk/item/8xz9y>.

<sup>8</sup> “Over 75% of people believe children are at significant risk of sexual abuse when using VR technology”, NSPCC, accessed 12<sup>th</sup> July 2024, <https://www.nspcc.org.uk/about-us/news-opinion/2023/over-75-of-people-believe-children-are-at-significant-risk-of-sexual-abuse-when-using-vr-technology/>.

Question	Your response
<p>nated content? Specifically, we are interested in:</p> <p>a) (i) specific examples of body image or depressive content linked to significant harms to children,</p> <p>b. (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.</p> <p>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.</p>	<p>child’s development stage, and the extent of parental involvement. Ofcom highlighted that there is a lack of research in this area and have based most of their recommendations on their quantitative tracking survey, the Children’s and Parent’s Media Literacy Tracker. Our research on adolescents (coinciding with Ofcom’s 13-15 age group) has found that certain design features within social media can amplify developmental changes that increase adolescents’ vulnerability to mental health issues.<sup>9</sup> This includes changes to behaviour, like sharing risky content and self-presentation, and changes to cognition, such as social comparison and experiences of social exclusion. Using longitudinal data measuring young people’s social media usage and life satisfaction, we also found social media use predicted levels of life satisfaction a year later, but only for participants at certain development stages. For girls aged 11, 12 and 13, there was a correlation between increased social media use and decreased life satisfaction, and the same effect was found for boys aged 14 and 15. Developmentally, this aligns with the fact that girls typically enter puberty earlier than boys.<sup>10</sup></p> <p>8. There is always going to be difficulty in creating a grading system of the harmfulness of content, since the same content can have different effects on different people. We have argued that it is important to understand the context within which vulnerability to harm occurs, proposing that taking a psychological approach can reconceptualise online harms, and can best anticipate and understand future harms.<sup>11</sup> This means moving away from reductively trying to categorise the harmfulness of content, behaviours, and technologies, and into a more holistic assessment of how sociotechnical components interact with psychological processes to create vulnerability to online harm. In this way, we should perhaps be discussing the ‘potential to do harm’ rather than harm itself. How a child perceives content is difficult to predict, and by shielding children from some content, it could prove harmful when they are exposed to it another time.</p> <p><b>Moreover, there is a lack of children’s input on what they consider harm to be within Ofcom’s proposals.</b> The inclusion of a few quotes from children is not critical evidence; a more systematic literature review of qualitative research encompassing the views of parents and children is needed. Plenty of high-quality, peer-reviewed research in this area already exists. Moreover, the research used to inform</p>

<sup>9</sup> Amy Orben *et al*, “Mechanisms linking social media use to adolescent mental health vulnerability”, *Nature Reviews Psychology*, 3, (2024): pp. 407–423, <https://doi.org/10.1038/s44159-024-00307-y>.

<sup>10</sup> “How social media affects teen mental health: a missing link”, *Nature*, accessed 12<sup>th</sup> July 2024, <https://www.nature.com/articles/d41586-023-00402-9>.

<sup>11</sup> Alicia Cork *et al*, “Rethinking Online Harm: A Psychological Model of Contextual Vulnerability”, preprint, submitted 3<sup>rd</sup> August 2022 <https://osf.io/preprints/psyarxiv/z7re2>.

Question	Your response
	Ofcom’s proposals should be regularly reviewed since this is such a rapidly changing landscape.
<b>Draft Guidance on Content Harmful to Children (Section 8)</b>	
<p>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?</p> <p>13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?</p> <p>14. For each of the harms discussed, are there additional categories of content that Ofcom</p> <p>a) should consider to be harmful or</p> <p>b) consider not to be harmful or</p> <p>c) where our current proposals should be re-considered?</p>	<p>Confidential? – N</p> <p>13. On sexual risks, in our NSPCC Review, we concluded that it is difficult to determine the platforms on which exposure to sexual risk and harm tends to occur. In part, this is because the relevant data is held by platforms and is hard to obtain. In addition, self-report studies with children rarely collect information on where risks are encountered.<sup>12</sup> Platforms hold this data but have been reluctant to share it in the past. We need access to the data to better understand children’s use of and experience of platforms.</p> <p>We also concluded that it is important to develop robust evidence on the prevalence of exposure to risk and harm on individual platforms, as this is currently lacking. Greater empirical understanding is also needed on sexual online risks in gaming environments and on direct messaging services, and how platforms’ design features facilitate (or prevent) behaviours associated with the four types of online sexual victimisation.<sup>13</sup></p> <p>We acknowledge that much more evidence is needed, especially in relation to sexual risks. For instance, the risks of livestreaming, generative AI, and how perpetrators can access children on the open and dark web.<sup>14</sup></p> <p>14. Ofcom’s categories of harmful content fail to encapsulate misogyny. This parallels the Online Safety Act (2023) and its lack of consideration for misogyny and violence against women and girls. Ofcom mention this issue but almost in a throwaway manner: “We’ll also be publishing guidance in early 2025 containing best practice for services on how they can take further steps to tackle online gendered harm against users (such as misogyny), including children”.<sup>15</sup> Although misogynistic behaviour is not legally considered hate speech, neither are other harms that Ofcom propose, such as the NDC ‘Dangerous stunts and challenges content’.</p>

<sup>12</sup> “Online risks to children”, NSPCC.

<sup>13</sup> “Online risks to children”, NSPCC.

<sup>14</sup> “Evidence Review on Online Risks to Children: Executive Summary”, NSPCC, accessed 12<sup>th</sup> July 2024, <https://learning.nspcc.org.uk/media/Ot5awnz0/online-risks-children-evidence-review-executive-summary.pdf>.

<sup>15</sup> Ofcom, “Protecting Children from Harms Online: A summary of our consultation”, p. 11, <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/284469-consultation-protecting-children-from-harms-online/associated-documents/summary-of-consultation.pdf?v=336045>.

Question	Your response
	<p><b>Beyond ‘content’</b> – Research by Livingstone contains a typology of risk relating to children’s internet use, which includes not only content but also ‘contact’ (participating in adult-initiated online activity) and ‘conduct’ (perpetrator or victim in peer-to-peer exchange).<sup>16</sup> Arguably, this is a more useful framework than Ofcom’s PC, PPC, and NDC content categorisation, since it encompasses not only the risks associated with children perceiving content, but the actions of other users, and of children themselves. Please find a copy of this table, which includes examples of different types of risks such as harassment, grooming, ‘sexting’, and gambling, in the Appendix (Appendix A).</p> <p>A fourth ‘c’ was recently added (henceforth: ‘content, contact, conduct and contract’ risks) and tested with Europe’s Safer Internet Centres and helplines for children’s online problems.<sup>17</sup> Recent research by the Digital Futures for Children centre showed that companies are making some improvements in their services to reduce content risks but doing far less to prevent contact, conduct or contract/consumer risks.<sup>18</sup></p> <p>We also must consider how platforms are designed. Social media is designed in a way that meets social needs, but simultaneously increases harms.<sup>19</sup> There is a rapidly growing body of robust social science evidence documenting the adverse consequences for children, especially vulnerable children (e.g. those facing mental health difficulties) of risky social media designs.<sup>20</sup></p>

<sup>16</sup> Sonia Livingstone, “Risk and harm on the internet”, *Media and the well-being of children and adolescents*, ed. Amy Jordan and Daniel Romer, (Oxford: Oxford University Press, 2014) pp. 129-146, <https://eprints.lse.ac.uk/62124/>

<sup>17</sup> Mariya Stoilova, Miriam Rahali, and Sonia Livingstone, “Classifying and responding to online risk to children: Good practice guide” (Better Internet For Kids, 2023), pp. 1-28, <https://www.betterinternetforkids.eu/documents/167024/200055/Good+practice+guide+-+Classifying+and+responding+to+online+risk+to+children+-+FINAL+-+February+2023.pdf>

<sup>18</sup> Steve Wood, “Impact of regulation on children’s digital lives” (research report, PrivacyX Consulting, 2024) [https://eprints.lse.ac.uk/123522/1/Impact\\_of\\_regulation\\_on\\_children\\_DFC\\_Research\\_report\\_May\\_2024.pdf](https://eprints.lse.ac.uk/123522/1/Impact_of_regulation_on_children_DFC_Research_report_May_2024.pdf)

<sup>19</sup> Georgia Turner *et al*, “Old strategies, new environments: Reinforcement Learning on social media”, preprint, submitted 22<sup>nd</sup> May 2024, <https://europepmc.org/article/PPR/PPR856680>.

<sup>20</sup> Katarzyna Kostyrka-Allchorne *et al* “Digital experiences and their impact on the lives of adolescents with pre-existing anxiety, depression, eating and non-suicidal self-injury conditions – a systematic review”, *Child and Adolescent Mental Health*, 28:1 (2023): pp. 22–32. . <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10108198/>; Catherine Hamilton-Giachritsis *et al* “Technology assisted child sexual abuse in the UK: Young people’s views on the impact of online sexual abuse”, *Children and Youth Services Review*, 119:105451 (2020) <https://www.sciencedirect.com/science/article/abs/pii/S0190740920306356>; Aiman El-Asam, Rebecca Lane, and Adrienne Katz “Psychological distress and its mediating effect on experiences of online risk: The case for vulnerable young people”, *Frontiers in Education*, 7 (2022) <https://doi.org/10.3389/educ.2022.772051>.



Question	Your response
<p><b>Volume 4: How should services assess the risk of online harms?</b></p> <p><b>Governance and Accountability (Section 11)</b></p>	
<p>15. Do you agree with the proposed governance measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>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.</p> <p>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?</p>	<p>Confidential? – N</p> <p>15.b. Following from the Glasgow SPRITE+ response to Ofcom’s consultation on ‘Protecting people from illegal harms online’, (response to question 3.i), it again appears that the governance of social VR is not adequately reflected within the proposals. Social VR platforms offer much less transparency for monitoring emerging harms as they operate as black boxes; we rely on self-reports and ethnographic approaches to understand which online harms occur. This contrasts with social media, in which researchers can analyse largely public data to understand online harm prevalence. Moreover, there is difficulty in evidencing harms in immersive environments, since ‘events’ are treated as communication rather than content, meaning there is no digital record of what occurred in that space unless the user explicitly chooses to record/capture the session. Specifically, this shows that Measure GA5, to “track unusual increases or new kinds of PPC, PC and NDC on the service that may be becoming present on the service”, is insufficient at protecting children from online VR harms.</p> <p>Research from PrivacyX Consulting, supported by Livingstone, notes that, “companies’ failure to publicly record the impact of design strategies or default settings that benefit children has created a perverse world in which companies, and governments, cite lack of evidence as a reason to take no action. Formal statutory requirements for record keeping, research access and transparency must be central to regulatory regimes.”<sup>21</sup></p>
<p><b>Children’s Risk Assessment Guidance and Children’s Risk Profiles’ (Section 12)</b></p>	

<sup>21</sup> Wood, “Impact of regulation on children’s digital lives”, p. 74.

Question	Your response
<p>17. What do you think about our proposals in relation to the Children’s Risk Assessment Guidance?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>18. What do you think about our proposals in relation to the Children’s Risk Profiles for Content Harmful to Children?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>Specifically, we welcome evidence from regulated services on the following:</p> <p>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?</p> <p>20. Are there any specific aspects of the children’s risk assessment</p>	<p>Confidential? – N</p> <p>17. First, we would like to raise the issue with Figure 1 on page 4 of the Children’s Risk Assessment Guidance. Stage 3 states: “Services in scope should carry out a children’s access assessment”, but this should say “children’s risk assessment”.</p> <p>Second, we believe that Ofcom’s recommendation that services should review their children’s risk assessments every 12 months is insufficient. Due to the rapid changes in the digital environment, we recommend that services should reassess at least every 6 months given the pace of change and evolution of nefarious uses of technology to perpetrate harms.</p> <p>In our NSPCC Review, we recommended that platforms provide more detailed information in the risk assessments required by the regulator.<sup>22</sup> This should include:</p> <ul style="list-style-type: none"> <li>• The number of reports and detections across different categories of risk and harm to children, including data on: <ul style="list-style-type: none"> <li>○ The amount of child sexual abuse material on their services as a proportion of pages/posts/content viewed</li> <li>○ The number of contacts between adult and child users, which are either reported or detected as inappropriate or indicative of technology-assisted child sexual abuse.</li> </ul> </li> <li>• Levels of usage of safety and reporting tools by child users; and the actions taken by the platform in response (including number of takedowns and response times).</li> <li>• The moderation systems and detection tools used by the platform to protect children from exposure to harmful content.</li> <li>• The type of age-assurance processes implemented.</li> <li>• The level of effective liaison with law enforcement, helplines and organisations, such as the Internet Watch Foundation (IWF) and the National Center for Missing &amp; Exploited Children (NCMEC).</li> <li>• Processes by which safety tools, reporting processes, content moderation, detection tools, and age-assurance processes are evaluated.</li> </ul> <p>Further reports specifically related to Ofcom’s proposals could include:</p> <ul style="list-style-type: none"> <li>• The number of underage children identified on a platform (and presumably removed from it).</li> <li>• The proportion of children who change default settings to make the service less safe (e.g. from private to public profiles).</li> <li>• False positives/negatives in the use of age assurance systems</li> </ul>

<sup>22</sup> “Evidence Review: Executive Summary”, NSPCC.

Question	Your response
<p>duties that you consider need additional guidance beyond what we have proposed in our draft?</p> <p>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?</p> <p>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.</p>	<ul style="list-style-type: none"> <li>• Responsiveness to reports by children of a problem on a platform (by time taken and by user satisfaction with the outcome).</li> <li>• Document children's access to risky services e.g. livestreaming or unmoderated chat.</li> </ul> <p>These reports would be most useful if broken down by age and gender.</p> <p><b>18. Ofcom fail to holistically consider children’s rights in the digital environment within their proposals.</b> Only in the ‘enhanced evidence inputs’ section of the Children’s Risk Assessment Guidance are children’s rights mentioned. For instance, an option for this type of evidence is the ‘views of independent experts’, which <i>could</i> include their view on the intersection of harms, mitigation measures, and the rights of children. But this level of enhanced input is only recommended for large services of 7 million or more users per month.</p> <p>We argue that this is not sufficient. The UK has ratified the UN Convention on the Rights of the Child. Children’s rights, including of equity and diversity, agency, development and wellbeing, must be built into <i>all</i> technologies by design. In this way, we recommend that Child-Rights Impact Assessments are conducted to help businesses anticipate the impact that their digital tools and services could have on children.<sup>23</sup></p> <p><b>Conducting impact assessments from a rights, rather than a risks, perspective allows for broader conceptualisation of impact, including of the positive impact digital technology can and should have on children.</b> This is an already established tool, and the Digital Futures Commission have put together guidance for businesses on how to incorporate children’s rights by design into their technologies.<sup>24</sup></p> <p><b>19. The four-step risk assessment is helpful in preventing children from accessing content, but it is not effective in preventing perpetrators from accessing children.</b> There needs to be more risk assessment of adults who access the platforms. Please see our response to question 31 on this issue.</p>
<p><b>Volume 5 – What should services do to mitigate the risk of online harms</b></p> <p><b>Our proposals for the Children’s Safety Codes (Section 13)</b></p>	

<sup>23</sup> Sonia Livingstone, Kruakae Pothong, and Beeban Kidron, “Digital Futures Commission – final report” (2023) [https://digitalfuturescommission.org.uk/wp-content/uploads/2023/03/DFC\\_report-online.pdf](https://digitalfuturescommission.org.uk/wp-content/uploads/2023/03/DFC_report-online.pdf).

<sup>24</sup> “Child Rights by Design”, Digital Futures Commission, accessed 12<sup>th</sup> July 2024, <https://childrightsbydesign.digitalfuturescommission.org.uk/>.

Question	Your response
<p><b>Proposed measures</b></p> <p>22. Do you agree with our proposed package of measures for the first Children’s Safety Codes?</p> <p>a) If not, please explain why.</p> <p><b>Evidence gathering for future work.</b></p> <p>23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?</p> <p>a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results from trialling or testing of measures.</p> <p>24. Are there other areas in which we should consider potential future measures for the Children’s Safety Codes?</p> <p>a) If so, please explain why and provide supporting evidence.</p>	<p>Confidential? – N</p> <p>22. The Children’s Safety Codes do not differentiate distinct age groups, and propose only to treat minors differently from adults. This is not age appropriate or rights-respecting. Instead, Ofcom must insist that platforms, especially risky ones, provide an age-appropriate experience and safety provision.</p> <p>We would also like to reinforce Lorna Woods and Maeve Walsh’s recommendations for product testing, mitigating measures and monitoring and assessment within the Children’s Safety Codes.<sup>25</sup></p>

<sup>25</sup> “Ofcom’s protection of children consultation: our summary response”, Online Safety Act Network, accessed 15<sup>th</sup> July 2024 <https://www.onlinesafetyact.net/analysis/draft-children-s-blog/>.

**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

25. Given that the types of content being generated are continually evolving, it is essential to keep these codes and processes up to date. To achieve this, a structured review process must be established. Regular reviews and updates will ensure that the protections remain effective and relevant in addressing new and emerging content types. This ongoing process will keep the industry informed and aligned with the latest standards and practices.

26. We fully support this approach and proposed changes to the draft Illegal Content Codes to further protect children. We also suggest including the BBFC and the IWF in these discussions, as they may already be conducting important work in this area.

An interesting reference point for the Children’s Safety Codes can be the work of the IWF with Aylo.<sup>26</sup> Over the last two years, Aylo has deployed IWF services, including the URL List, Hash List, Non-photographic Imagery List, and Keywords List across its platforms. Aylo had already introduced comprehensive safeguards to its platforms, including mandatory uploader verification, banning downloads, expanding moderation workforce and processes, and partnering with non-profit organisations around the world. It is hoped the new standards will pave the way for the adult sector, which has billions of users worldwide, to begin deploying IWF technology to block, remove, and prevent the spread of child sexual abuse imagery.

27. Many of the proposed measures apply only to large and multi-risk organisations. Given that smaller companies are likely to be less compliant, this is highly problematic and should be reviewed. In addition, children are often keen to become involved in new and exciting smaller services that adults have not caught onto yet. Therefore, all services operating in the UK should be carefully risk assessed.

<sup>26</sup> “Aylo and IWF partnership ‘paves the way’ for adult sites to join war on child sexual abuse online”, Internet Watch Foundation, accessed 12<sup>th</sup> July 2024, <https://www.iwf.org.uk/news-media/news/aylo-and-iwf-partnership-paves-the-way-for-adult-sites-to-join-war-on-child-sexual-abuse-online/>.

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**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.

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?

Confidential? – N

31. The guidance does not mention age verification in the context of stages of cognitive development. For example, older children are likely to be more able to circumvent some age assurance measures. We recommend developmentally-tailored age assurance measures.<sup>27</sup>

Moreover, there is difficulty in aligning the age assurance measures with anonymity and privacy. Photo ID matching and facial age estimation are suggested as highly effective age assurance measures. There is a danger of having this data misused if it falls into the wrong hands, and therefore a threat of undermining children's safety in the future if this data is not sufficiently safeguarded. Of course, there are privacy risks intrinsic to all online experiences. What is important is *who* takes ownership of the data and *how* it can be kept secure.

Finally, whilst there is understandably emphasis on age verification for children to limit their access to specific pages, there needs to also be a reciprocal focus on how adults can access these pages and harm children.

Ofcom's proposals may lead to a risk of victim-blaming children. Preliminary findings from our work with adult survivors of child sexual abuse include the ability of perpetrators of online sexual abuse to access community webpages which children frequent. For example, one survivor spoke about the fan page of a particular pop star who is popular with young girls which perpetrators access. Other examples include gaming platforms and particular messaging platforms and forums that are oriented to children, but which do not restrict adult access.

Further preliminary findings from this research – in which we partnered with the Marie Collins Foundation, Survivors' Trust, and Somerset and Avon Rape and Sexual Assault Services – indicate that some survivors who experienced both online and contact sexual abuse report experiencing greater harm from the online component of the sexual abuse than from the contact sexual abuse. They felt that the "infiniteness" (participant quote) of the internet was insurmountable and produced additional challenges to long-term coping. Additionally, they

<sup>27</sup> "Online risks to children", NSPCC.

	<p>felt that while many contexts have improved understandings of contact sexual abuse (schools in particular), there was still widespread victim blaming, popular misconceptions, and considerable stigmatisation surrounding online sexual abuse and exploitation.</p> <p>Importantly, wider research indicates that the impacts of child sexual abuse with an online component show very little difference from the impacts of solely contact sexual abuse.<sup>28</sup></p>
<b>Content moderation U2U (Section 16)</b>	
<p>36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes?</p> <p>a) Please provide any arguments and supporting evidence.</p>	<p>Confidential? – N</p> <p>36. The challenges posed by the wider roll-out of end-to-end encryption (E2EE) are not discussed by Ofcom. This will reduce the ability of platforms and law enforcement to detect technology-assisted child sexual abuse and child sexual abuse material’.<sup>29</sup></p> <p>On the other hand, there are privacy concerns surrounding the content moderation of private messaging apps, as mentioned in 15.210 (it is “proportionate” that measures AA3 and AA4 on age assurance include such services). REPHRAIN has conducted a systematic analysis of these risks and any monitoring or intrusion into E2EE messaging.<sup>30</sup> There is extensive evidence and consensus from UK and international researchers on the privacy harms (including to children and young people) that this will pose. We strongly recommend that Ofcom takes on board the findings and recommendations from the above report.</p> <p>And as previously discussed, the behaviour of other social agents does not fall under Ofcom’s category of ‘content’. It appears that ‘content’ comprises only text and images. “Automated content moderation” is discussed in Section 13, and we agree with Ofcom’s position that current automation technologies – including keyword and nudity detection – would be insufficient at protecting</p>

<sup>28</sup> Helen Whittle, Catherine Hamilton-Giachritsis, and Anthony Beech “Victims’ Voices: the Impact of Online Grooming and Sexual Abuse”, *Universal Journal of Psychology* 1(2) (2013) pp. 59-71 <https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=174428aa5fe3e452a55a14fc2c7512e8735c07fe>.

<sup>29</sup> “Online risks to children”, NSPCC.

<sup>30</sup> Claudia Peersman *et al*, “Towards a Framework for Evaluating CSAM Prevention and Detection Tools in the Context of End-to-end encryption Environments: a Case Study” (REPHRAIN research report, 2023) pp. 1-30, <https://www.rephrain.ac.uk/safety-tech-challenge-fund/>.

	<p>children online, since we do not yet have the tools to automatically moderate actions.</p> <p>This includes harassment and bullying in VR environments.<sup>31</sup> Due to the immersion of VR, abuse and harassment in these environments can feel closer to that experienced in real-life rather than social media. Therefore, perhaps Ofcom could consider more input from law enforcement who deal with real-life abuse cases, rather than just online safety experts.</p> <p>Lastly, from interviews with children, we have found that much harmful content is hidden, such as an innocuous or blank video that says: ‘check the comments below’; the comments below contain only a link; the link leads to illegal content or grooming contact such as via another app, cloud or encrypted messenger service. Since this content falls outside of regulated platforms, Ofcom’s measures do not account for this kind of harm.</p> <p>37. We agree with measure 4G on providing materials to volunteer moderators to help them in their role. We would extend this to psychological support. However, whether volunteer moderation is suitable in the context of children is questionable since there is very limited vetting. If a service provider cannot afford paid moderators, a better approach might be to demand that platform owners (such as Meta, Sony, Microsoft etc) provide this service.</p>
<b>Search moderation (Section 17)</b>	
<p>38. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>39. Are there additional steps that services take to protect children from the harms set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>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?</p>	<p>Confidential? – N</p>

<sup>31</sup> Fiani *et al*, “Exploring the Perspectives of Social VR-Aware Non-Parent Adults”.





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 provide 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.

Confidential? – N

43. From interviews with children, we have found that many say when they report problematic content, the platform fails to respond, either at all, or quickly enough, or adequately. Children have recounted seeing suicides, beheadings or other violence and receiving no response when they report it.

Platforms should use a victim-centred approach in their reporting and complaints mechanisms. This includes:

- Making it possible for children to make a report retrospectively if they cannot relay their concerns in real time or immediately after their encounter.

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)?

a) Please provide any arguments and supporting evidence.

- Children should be offered appropriate options to describe their experience and be reassured that their report would be taken seriously, and their confidentiality maintained.
- Ensuring reporting methods are child-friendly and easy for children to locate and use if they wish to make a report or complaint, or flag harmful behaviour.
- It should be a fundamental requirement on all platforms to promote a positive culture of reporting and offer prompt and effective recourse to users.<sup>32</sup>

From an alternative perspective, as we found through interviews with experts in online and child safety and psychology, having the ability to explain, apologise or have a second chance before punishment can be more useful for children to understand the impact of their harmful actions in online environments.<sup>33</sup> For instance, this could be through sending a personal message of the decision to the offender with the opportunity to explain themselves if they disagree. This can be especially useful for neurodivergent children.

<sup>32</sup> "Online risks to children", NSPCC.

<sup>33</sup> Cristina Fiani *et al.* "Pikachu would electrocute people who are misbehaving": Expert, Guardian and Child Perspectives on Automated Embodied Moderators for Safeguarding Children in Social Virtual Reality", *Proceedings of the CHI Conference on Human Factors in Computing Systems*, 113 (2024) pp. 1-23 <https://dl.acm.org/doi/10.1145/3613904.3642144>.



**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

**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

Confidential? – N

49. Again, we echo Woods and Walsh in their calls for recommender system measures to be integrated into a “safety by design approach”, rather than appearing far down the product development and design process.<sup>34</sup>

However, we recognise that evidence surrounding the harms of recommender systems is mixed, with early findings from our DIORA research showing a significant and substantial relation between content and contact risk exposure and depressive symptoms.<sup>35</sup>

<sup>34</sup> “Ofcom’s protection of children consultation”, Online Safety Act Network.

<sup>35</sup> “DIORA: Dynamic Interplay of Online Risk and Resilience in Adolescence”, London School of Economics, accessed 12<sup>th</sup> July 2024, <https://www.lse.ac.uk/media-and-communications/research/research-projects/DIORA>.



<p>to your response here, please signpost to the relevant parts of your prior response.</p> <p>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?</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"><li>• Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.</li></ul>	<p>Similarly, Radensky <i>et al</i> found that thumbnails in video-sharing platforms popular with children often contained problematic, disturbing images.<sup>36</sup> This suggests that video-sharing platforms may recommend problematic videos to children when they search for problematic content.</p> <p>However, in a recent study examining teenagers’ TikTok history, we found that there was only a very small association between TikTok use and psychological problems. This was the first study that investigated the relationship between psychological problems and TikTok use; further research must be conducted. Please contact us for pre-print information on this research.</p>
<b>User support (Section 21)</b>	
<p>53. Do you agree with the proposed user support measures to be included in the Children’s Safety Codes?</p>	<p>Confidential? – N</p> <p>53. As mentioned in the Glasgow SPRITE+ response to ‘Protecting people from illegal harms online’ (question</p>

<sup>36</sup> Jenny Radesky *et al*, “Algorithmic Content Recommendations on a Video-Sharing Platform Used by Children”, *JAMA Netw Open*, 7:5 (2024) <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2819134>.

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.

31i), there is a lack of consideration for parental/guardian oversight of children’s usage of platforms. This is despite Ofcom acknowledging in 7.15 ‘Recommended age groups’ that for the age group 0-5 “parental involvement substantially influences their online activity”, and parents set rules to control and manage use of services for 6-9 year olds. Therefore, it is surprising that in section 21.9, Ofcom state that parental controls are not something they are proposing, despite recognising this as a user support feature.

We argue that parental controls and further parental involvement are necessary to support children in online environments, especially in VR where parents cannot see the experience their child is having.<sup>37</sup> However, since we have found that some parental controls help, some are ineffective, and some are counterproductive, if Ofcom is to recommend them, it must be clear which ones work.<sup>38</sup>

We welcome measures US5 and US6, but argue that links to psychological support should extend beyond children and encompass parents/guardians as well.

Again, returning to VR, the more immersive the platform is, the higher the user support needs to be. Ofcom do not distinguish between the different types of online platform, from social media, to video content consumption, to online virtual worlds.

For adult survivors of sexual abuse, survivor-led support and materials are crucial to avoid stigmatisation and ensure they are tailored for survivors. They often lack survivor-focused support spaces, and attending non-survivor sessions can be harmful due to victim-blaming. Therefore, while reporting harmful content is positive, incorporating survivor-run spaces to support children would be even more impactful.

It is helpful that Ofcom includes helplines for reporting abuse in their report. However, it is important to identify other channels of disclosure, including more informal arrangements.

**Search features, functionalities and user support (Section 22)**

<sup>37</sup> Fiani *et al*, “Exploring the Perspectives of Social VR-Aware Non-Parent Adults”.

<sup>38</sup> Mariya Stoilova, Monica Bulger, and Sonia Livingstone “Do parental control tools fulfil family expectations for child protection? A rapid evidence review of the contexts and outcomes of use”, *Journal of Children and Media*, (2023) 18:1, pp. 29-49. <https://doi.org/10.1080/17482798.2023.2265512>.



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 ser-  
vices and the impact of search func-  
tionalities 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 sec-  
tion. We welcome further evidence  
from stakeholders on the following  
questions and please provide argu-  
ments and evidence to support your  
views:

57. Do you consider that it is techni-  
cally feasible to apply the proposed  
codes measures in respect of GenAI  
functionalities which are likely to per-  
form or be integrated into search  
functions? Please provide arguments  
and evidence to support your views.

Confidential? – N

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### 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

58. This question seems to imply that there might be business reasons why it is acceptable to put children at risk. If so, it is ill-phrased. The task is to protect children's safety along with all their other rights, including privacy, expression, and inclusion.<sup>39</sup> Ofcom should make an explicit best interests determination if it believes these rights may be compromised.

From a service perspective, there are potentially too many proposals for a service to implement. It would be useful if Ofcom could produce a summary prioritising which measures are most urgent for services to adopt.

A way to create this could be to develop discrete archetypes of different types of online platforms. For example, create three ‘use cases’ (such as immersive virtual reality, virtual games, and online social media), and then map out the proposals onto each type of platform. This would enable platforms to be more proactive about taking on such measures, especially since some outlined measures are not applicable to certain platforms.

Throughout these proposals, Ofcom have focused too much on the size of a platform, and not on the service that it provides.

**Yet outside of services, Ofcom fail to account for significant stakeholders in their proposals: platform owners,** including Sony, Microsoft and Meta. These organisations have the resources to mandate what protections such services put in place. This is particularly important in VR, where platform owners have more regulatory responsibility than service providers.

### Statutory tests (Section 24)

<sup>39</sup> Sonia Livingstone *et al*, “The best interests of the child in the digital environment” (research report, Digital Futures for Children centre, LSE and 5Rights Foundation, 2024) pp. 1-28  
[https://eprints.lse.ac.uk/122492/3/Best\\_Interests\\_of\\_the\\_Child\\_FINAL.pdf](https://eprints.lse.ac.uk/122492/3/Best_Interests_of_the_Child_FINAL.pdf).



<p>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?</p> <p>a) If not, please explain why.</p>	Confidential? – N
<p><b>Annexes</b></p> <p><b>Impact Assessments (Annex A14)</b></p>	
<p>60. In relation to our equality impact assessment, do you agree that some of our proposals would have a positive impact on certain groups?</p> <p>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?</p> <p>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.</p>	Confidential? – N

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



## Appendix

### Appendix A

*Table 8.1 Risks Relating to Children's Internet Use (Exemplars Only)*

	<i>Content Receiving mass-produced content</i>	<i>Contact Participating in (adult-initiated) online activity</i>	<i>Conduct Perpetrator or victim in peer-to-peer exchange</i>
<b>Aggressive</b>	Violent / gory content	Harassment, stalking	Bullying, hostile peer activity
<b>Sexual</b>	Pornographic content	"Grooming," sexual abuse or exploitation	Sexual harassment, "sexting"
<b>Values</b>	Racist / hateful content	Ideological persuasion	Potentially harmful user-generated content
<b>Commercial</b>	Embedded marketing	Personal data misuse	Gambling, copyright infringement

Taken from: Sonia Livingstone, "Risk and harm on the internet", *Media and the well-being of children and adolescents*, ed. Amy Jordan and Daniel Romer, (Oxford: Oxford University Press, 2014) pp. 129-146, <https://eprints.lse.ac.uk/62124/>.

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