



## Vodafone response to Ofcom's consultation: Protecting Children From Harms Online

Vodafone has been at the forefront of keeping our customers safe online for many years. While the Online Safety Act places a legal responsibility on online service companies with regard to safety, in our role as a connectivity provider we voluntarily contribute where we can. We do this in a number of ways.

1. For the connectivity services we offer (fixed broadband and mobile), we have robust parental controls<sup>1</sup>. The controls empower our users to make choices appropriate to them. They include customisable filters so that only age-appropriate content is accessed when browsing the internet. The choice to turn off the internet at bedtime to help children switch off at night by turning off access on their connected devices, and additionally enabling the choice to pause access to the internet on connected devices at any time of day.
2. We have always recognised the role of network-level blocking in protecting people from harmful content. That is why we are active members of the Internet Watch Foundation utilising their blocking lists to remove child sexual abuse content. In March 2024 alone we received and actioned over 600,000 hits against URLs on our mobile and fixed networks. Vodafone has also sought to work collectively with industry and Government through the UK Council for Internet Safety to deliver on the shared ambition to make the UK the safest place to be online.
3. We deliver the widely respected Digital Parenting programme<sup>2</sup> aimed at supporting families to be safe online. We look out for opportunities to facilitate education and created a video<sup>3</sup> for Safer Internet Day following research findings that six-in-10 (69%) boys aged 11-14 have been exposed to online content that promotes misogyny and other harmful views.
4. We partner with the NSPCC and together are committed to making sure every child has a happy and safe online life. We share areas of interest in the child safety online space and work together to do the following:
  - a) Empower parents to make the right decisions for their family.
  - b) Support young people by giving them a voice on the topics and products that matter to them.
  - c) Create a safer online world with children, for children by amplifying the partnership through employee engagement.

Our membership of the NSPCC Child Safety Online Taskforce<sup>4</sup> has given us first hand insight as to how the NSPCC has extended its extensive history in real world expertise in children's safety, including Childline to include online safety. Furthermore, another element of our partnership has allowed the NSPCC to take a unique approach and create a new taskforce that will allow them to get engagement and views of children themselves called the Voice of Online Youth<sup>5</sup>.

The NSPCC has made the following recommendations in response to Ofcom's consultation which we endorse:

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<sup>1</sup> [Secure Net \(vodafone.co.uk\)](https://www.vodafone.co.uk)

<sup>2</sup> [Digital Parenting - Vodafone UK News Centre](#)

<sup>3</sup> [AI 'Aggro-rithms' target boys with harmful content within 60s \(vodafone.co.uk\)](https://www.vodafone.co.uk)

<sup>4</sup> [Nicki Lyons: Why Ofcom's new measures are a step in the right direction \(vodafone.co.uk\)](https://www.vodafone.co.uk)

<sup>5</sup> [New youth-led NSPCC group aims to give young people a voice \(vodafone.co.uk\)](https://www.vodafone.co.uk)



**Enforcing minimum age limits.** All services which set a minimum age limit must ensure that users who are below this age are not able to use their platform. Children who are below minimum age limits are currently at significant risk online. Ofcom must require that platforms address this.

**Addressing all identified risks.** It is highly concerning that Ofcom have identified significant risks to children in the Register of Risks, but these are unaddressed in the Codes of Practice. The Act prescribes that Codes are 'safe harbours' for services. Without a change to the Act by Government, or the naming of more comprehensive, outcomes-based measures, features and functionalities which are proven to put children at risk will continue to go unaddressed e.g. harm in livestreaming.

**Utilising innovative technologies and approaches.** There must be a greater use of proactive technologies, which can introduce friction into harm pathways and ensure harmful content and behaviour is swiftly identified. Otherwise, children will continue to carry the burden of having to protect themselves online.

**Tackling harm in private messaging.** As public spaces improve their safety measures, there is a significant risk that illegal and legal harms will migrate to private messaging services, which already pose a major risk to children. Ofcom must pre-empt this and introduce robust measures for private messaging services now.

**Aligning measures for the Illegal and Legal Codes.** It is vital that the strongest measures are in place to tackle the most egregious risks to children online, including child sexual abuse and exploitation (CSEA). All measures which could strengthen protection from CSEA which are included in this Code must be added to the Illegal Harms Codes too.

We remain committed to working with partners to deliver programmes and campaigns that support the mission of achieving online safety and will be engaging with the relevant Ofcom teams in the coming weeks to share details of our plans.