

Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.

Is this a confidential response? (select as appropriate)

No

CEASE is a human rights charity whose mission is to expose and dismantle the cultural and commercial driving forces behind all forms of sexual exploitation in the UK.

We shine a light on what sexual exploitation is, where it occurs and how it contravenes our human rights. We campaign for new and better laws, advocate for policy change and hold the global sex industry to account. We also work to amplify the voices of survivors of sexual exploitation.

We specifically focus on the harms of pornography to our culture, individuals, and children. Pornography is driving hypersexualisation, sexual objectification and sexual entitlement. It also influences our sexual norms, attitudes and behaviours. Research confirms that it's having a particularly damaging impact on our children and young people.

According to the UK Government's 2015 statistics, [each month 1.4 million](#) children visit pornography sites from their desktop. A wide [range of studies](#) show that viewing pornography can profoundly impact children's psychological, social, emotional, neurological and sexual wellbeing, and impede their ability to form healthy, intimate relationships.

In 2021, [Ofsted](#) reported how easy access to pornography had set unhealthy expectations of sexual relationships among children. Adolescent porn consumption is associated with more permissive sexual attitudes, more sexual intercourse and more casual sex, along with stronger gender-stereotypical sexual beliefs, the tendency to support "[rape myths](#)" and the perception of [women as sex objects](#) (among both boys and girls).

CEASE firmly believe that children having unfettered access to hardcore pornography online is an immediate child protection issue that needs to be addressed by the UK government and we continue to campaign on this issue.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Is this a confidential response? (select as appropriate)

[Please select]

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Question 3: What information do services have about the age of users on different platforms (including children)?

Is this a confidential response? (select as appropriate)

[Please select]

Question 4: How can services ensure that children cannot access a service, or a part of it?

Is this a confidential response? (select as appropriate)

No

All regulated services, whether user-to-user services that host user-generated pornographic content, or services that host solely provider published pornography content, or search services that direct users to pornography sites, must implement robust, independent, certified age verification to prevent children from accessing pornographic content online. Regulated services must be satisfied beyond reasonable doubt that a user is 18 years or over.

As the regulator, Ofcom should specify an outcome-based standard for age checks to prevent sites applying weak, inaccurate, untested age estimation algorithms that will allow many underage users access to their content.

There should also be a consistent approach to enforcement of age verification both within the service itself and by the regulator, with one code of practice for all pornographic content. Age verification for pornography should be enforced rigorously wherever pornography is found on the internet and with due regard to the detrimental harm it causes to children who consume it, either accidentally or intentionally.

Question 4: How can services ensure that children cannot access a service, or a part of it?

This should not be difficult given that age verification is already used for online services every day – from purchasing age restricted goods online to online gambling, and thus this same regulation can and should be used for online pornography.

And of course, for sites, like Twitter, where pornography isn't their main focus, but was reported by the Children's Commissioner as the only platform outperforming adult sites in exposing children to pornography, it is an option to ban this content until they are ready to comply with age verification. Many social media sites already ban adult content, and technology exists which allows them to scan for it and remove it if it is uploaded

It is also worth noting that when it comes to determining the extent of the measures a site should apply to protect children, the size and capacity of a service should not be taken into account by the regulator. Instead, **measures to enforce age verification should be applied in proportion to the risk of harm to children posed by a site, not in proportion to the site's financial capacity, nor the impact on its revenues of these basic protections for children.** If sites cannot afford to implement protection for children from exposure to adult content, they should not be permitted to publish that material at all.

Furthermore, age verification should be implemented within 6 months of Royal Assent of the Online Safety Bill. Age verification to prevent children from accessing pornographic content was first introduced in the Digital Economy Act 2017. In 2019, the Government announced they would not implement the provisions. Since then, Barnardo's estimates that children have accessed pornographic content 54 million times. We cannot afford to delay this any longer.

As the Bill currently stands, there is no deadline for age verification to be implemented, and it's looking like it will not be implemented until 2026 at the very earliest.

Yet, there is no need for this extended wait for services to implement age verification. In France, Mindgeek implemented age verification with ten days' notice – and did so over Christmas and New Year. In Louisiana in the US, sites implemented age verification as soon as the legislation came into force in January this year. In the UK, sites have been prepared for age verification since the passage of the Digital Economy Act in 2017.

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

Is this a confidential response? (select as appropriate)

No

While many big pornography sites have access to up-to-date technology solutions and revenue within the billions, they must not be permitted to implement their own version of age verification.

Pornography sites are commercially incentivised to resist or ignore age verification since their business model depends on maximising the number of visitors to the site. In fact, rather than championing age verification on its sites, the pornography giant Pornhub poured its energies into creating its [own VPNs](#) which will allow savvy underage users to bypass any controls put in by

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Internet Service Providers. Furthermore, the pornography industry "[*aggressively markets its products to children*](#) in a number of ways", including by "*studying children's common keystroke errors in order to direct them to porn sites, and making pornography based on children's favourite cartoon characters*". This is not an industry which can be trusted to prioritise the protection of children.

There are multiple independent age verification companies that can be used by services which host pornographic content to implement age verification. These are privacy preserving for the consumer and independent of pornography sites. The OSB must stipulate that any age verification provider is certified in a manner approved by Ofcom in order to ensure the highest possible standard of age verification.

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Is this a confidential response? (select as appropriate)

[Please select]

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

Evidence of the harm pornography causes to children is indisputable.

Over the past 20 years, a vast, global pornography industry has sprung up online. However, unlike other global industries, online pornography has avoided virtually all regulation, scrutiny and accountability, which has allowed it to pursue profit without restraint. The online porn industry is neither naive nor neutral. Free from oversight, it has monetised videos of rape, abuse and other non-consensual sex acts. Always at the forefront of tech advancement, the porn industry has

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

designed its sites to ensure that vast numbers of visitors stay for as long as possible and return again and again - even if they are children.

Much of today's online porn [sexualises violence, and foregrounds men's aggressive sexual domination over women](#). A [2015 meta-analysis](#) looking at the links between porn consumption and sexually-aggressive behaviour found that "exposure to non-violent and violent pornography results in increases in both attitudes supporting aggression and in actual aggression."

[Analysis](#) of 131,738 titles of videos recommended to first-time users on Pornhub, XVideos, and XHamster, found that:

- 1 in every 8 titles described sexual activities that constitutes sexual violence as defined by the World Health Organisation
- The word 'Teen' was the most frequently occurring word across the entire dataset
- Sexual activity between family members was the most frequent form of sexual violence
- The second most common category was that of physical aggression and sexual assault

Moreover, children are consuming this material at an unprecedented level. In 2015 the UK Government estimated that each month 1.4 million children were visiting pornography sites from their desktop. That figure is likely to have increased, particularly during the Covid-19 pandemic where adults and children were increasingly online.

Children's consumption of pornography has devastating impacts. A wide range of studies show that viewing pornography can profoundly impact children's psychological, social, emotional, neurological and sexual wellbeing, and impede their ability to form healthy, intimate relationships.

Yet, they continue to be allowed to access this material by both the porn industry and the UK government. In March 2018, [Childline](#) revealed that more than 2,000 children had sought counselling after accidentally stumbling onto hardcore pornography online; of those, one in ten children who received psychological help was 11 or under, and 63% were aged 12 to 15.

Research undertaken by the [Children's Commissioner's Office in January 2023](#) found that young people are frequently exposed to violent pornography, depicting coercive, degrading or pain-inducing sex acts; 79% had encountered violent pornography before the age of 18.

It also found that many children are first exposed to pornography at a very young age: 10% had seen it by age nine, 27% had seen it by age 11 and 50% of children who had seen pornography had seen it by age 13.

Respondents were more likely to state that girls expect or enjoy sex involving physical aggression, such as slapping or choking, than boys do. (Sexual aggression is generally portrayed as consensual (i.e. men dominating willing young women) and 'sensual' (i.e. presented as pleasurable).

47% of respondents stated that girls expect sex to involve physical aggression. A further 42% of respondents stated that girls enjoy physically aggressive sex acts.

This reinforces Ofsted 2021 findings which reported that easy access to pornography had set unhealthy expectations of sexual relationships among children.

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Another [recent UK survey](#) found that 44% of boys aged between 11 and 16 who regularly viewed porn reported that it gave them ideas about the type of sex they wanted to try. The [UK's Big Talk Education Report](#) found that, for many boys, pornography is the main source of information about sex and sexual behaviour: "Questions like, 'Is it ok for me to cum over my girlfriend's face?' are not unusual, as is the apparent normalisation of anal sex."

In this context, it is unsurprising that children's consumption of online pornography has been associated with the [dramatic increase in child-on-child sexual abuse](#) over the past few years, which now constitutes around a third of all child sexual abuse. The [consequences](#) for both the perpetrator, who's often 'acting out' what he/she has seen in porn, and to the victims of this abuse, are often serious and far-reaching.

Yet, children's free and easy access to online pornography continues, with more and more children being damaged by its effects. Ofcom must ensure children cannot access pornographic content wherever it appears online.

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

[Please select]

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

[Please select]

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Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?

Is this a confidential response? (select as appropriate)
[Please select]

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

Is this a confidential response? (select as appropriate)
[Please select]

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?¹

Is this a confidential response? (select as appropriate)

[Please select]

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Is this a confidential response? (select as appropriate)

[Please select]

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Is this a confidential response? (select as appropriate)

[Please select]

¹ See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Is this a confidential response? (select as appropriate)

[Please select]

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

Is this a confidential response? (select as appropriate)

[Please select]

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Is this a confidential response? (select as appropriate)

[Please select]

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

Is this a confidential response? (select as appropriate)

[Please select]

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

Is this a confidential response? (select as appropriate)

[Please select]

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

Is this a confidential response? (select as appropriate)

[Please select]

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Question 22: How are human moderators used to identify and assess content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Question 23: What training and support is or should be provided to moderators?

Is this a confidential response? (select as appropriate)

[Please select]

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?

Is this a confidential response? (select as appropriate)

[Please select]

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?

Is this a confidential response? (select as appropriate)

[Please select]

Question 26: What other mitigations do services currently have to protect children from harmful content?

Is this a confidential response? (select as appropriate)

[Please select]

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?

Is this a confidential response? (select as appropriate)

[Please select]

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]