

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

About Refuge

Refuge is the largest specialist provider of gender-based violence services in the country supporting thousands of women and children on any given day. Refuge opened the world's first refuge in 1971 in Chiswick, and 50 years later, provides: a national network of 44 refuges, community outreach services, child support services, and acts as independent advocates for those experiencing domestic, sexual, and other gender-based violence. We also run specialist services for survivors of modern slavery, 'honour'-based violence, tech abuse and female genital mutilation. Refuge provides the National Domestic Abuse Helpline which receives hundreds of calls and contacts a day across the Helpline and associated platforms.

Interest in protection of children online

Refuge supports thousands of children every year, and most of the people we support are children. Two thirds of the residents in our refuges are children,¹ and our community-based services and dedicated Technology-Facilitated Abuse team also provide support to children and young people. Refuge has therefore developed expert insight into how children experience online harms as part of domestic abuse – for example by being 'gifted' tracking devices by the perpetrator-parent. Our new National Youth Technology-Facilitated Abuse Lead has also been conducting workshops with young people in schools and community centres in recent months, hearing from girls and boys about their experiences online. These young people have expressed a desire to have conversations about online spaces and the harms they have experienced and witnessed. Themes emerging from these workshops have been shared within this submission. We have responded to questions within the call for evidence which are relevant to our expertise.

Domestic abuse is a crime, and children are now recognised as victims and survivors of domestic abuse in their own right, following the passage of the Domestic Abuse Act 2021. Yet some forms of online harassment and abuse experienced by children as part of domestic abuse fall just short of criminality. The young people we have spoken with have also raised concerns about legal harmful online content, such as the "Manosphere", the proliferation of misogynistic content and creators such as Andrew Tate who encourage and promote violence against women and girls (VAWG). Domestic abuse and VAWG is rooted in, and is both a cause and consequence of misogyny, gender inequality and sexism. Refuge is therefore concerned about the rise in misogynistic online content, particularly that which is targeted at young people. In addition to our work on the Online

¹ <https://refuge.org.uk/wp-content/uploads/2022/10/Refuge-Annual-Report-2021-22.pdf>

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Safety Bill (see below), Refuge is also working with a survivor-led campaign, Make It Mandatory, to call for coercive control and domestic abuse education to be made mandatory for 16-19 year olds.²

VAWG Code of Practice

We strongly recommend that a dedicated Code of Practice specific to violence against women and girls (VAWG) be developed by Ofcom. This recommendation is supported by a wide coalition of organisations and academics, including End Violence Against Women Coalition, Glitch, Carnegie UK, NSPCC, 5Rights and Professors Clare McGlynn and Lorna Woods, as well as the Domestic Abuse Commissioner and former Victims' Commissioner.³

⁴ A dedicated Code, drafted in collaboration with VAWG specialists, would provide suitable guidance to services and ensure existing best practice is shared more widely on the appropriate prevention and response to VAWG, including legal harms experienced by girls. We encourage Ofcom to refer to the [model Code of Practice](#) drafted by the aforementioned organisations as part of our response to this call for evidence.

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 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]

² <https://refuge.org.uk/news/refuge-refuge-launches-make-it-mandatory-campaign-coercive-control-education/#:~:text=About%20Make%20it%20Mandatory&text=The%20group%20aims%20to%20change,have%20not%20focused%20on%20enough>.

³ Domestic Abuse Commissioner, Blog: [Commissioner calls for Online Safety Bill to be more robust when it comes to domestic abuse and violence against women and girls](#), 19 April 2022,

⁴ Victims Commissioner, ['The Impact of Online Abuse: Hearing the Victims' Voice'](#), 2022.

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

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)

[Please select]

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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

We have responded to questions 2-5 within this response, and also wish to point to 5Rights Foundation for their expertise in age assurance.

From the engagement work our Technology-Facilitated Abuse team has conducted with young people, it is apparent that young people are aware of age restrictions on platforms and agree with the use of these safety functions. A recurring theme raised by girls in workshops has been that of repeated unwanted contact by older men on platforms despite, or because of, platform features which clearly shown the girls' 'real' ages on their profiles. This suggests that whilst many young people are responsibly adhering to age assurance processes, platforms are not implementing adequate safety measures to

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protect young users from perpetrators who specifically use age verification to search for potential victims. We echo the recommendations in the model Code of Practice that services should consider specific user empowerment tools for users under 18. This could include tools to stop children from receiving unsolicited messages from adults, and measures which are targeted at the adults sending such messages; notifications to make an adult messaging a child aware of the policies of the service in relation to communication with children; and notification to ask a child if they know who is messaging them and to explain what children can do if they are confused or made to feel uncomfortable by it.

In addition, young people have repeatedly raised concerns that even when they do adhere to the principles of age verification and provide their real ages to access a service, they are still encountering inappropriate content on platforms. Often young people must manually 'toggle off' their access to sensitive content, or block individual pieces of content they do not wish to see. The onus is largely placed therefore on young people and children to verify their age, and then to monitor and act on content pushed to them. Young people have expressed frustration with this and feel that age verification systems will only be successful in preventing children from accessing inappropriate content if paired with effective content moderation.

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)

No

Through our role as a provider of specialist VAWG support services, Refuge is aware of a variety of content that is harmful to children on services in scope of the Bill. As outlined previously, whilst domestic abuse is a crime, some forms of technology-facilitated abuse directed at children by perpetrators of domestic abuse may fall short of the thresholds of criminal law. This may include being contacted by the perpetrator via gaming platforms in an effort to determine the location of the child and mother, after they have fled to a secure location, as the following case study highlights:

"The children have got [a] PlayStation and he was paying for it. So every time the children turn the PlayStation on, his name pops up on the screen. The children wanted to delete him. I think (the tech abuse) is still ongoing because he's paying for the PlayStation." - A survivor of domestic abuse, describes her suspicions that her former partner has attempted to contact her children by creating accounts and inviting them to play on a gaming platform.

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Young people have also raised with us many examples of misogynistic content, particularly relating to the 'Manosphere,' which they have said has become a serious concern. A BBC investigation, using Institute for Strategic Dialogue research, has revealed an increase in misogynistic channels in the months since Elon Musk's takeover of Twitter. Data collected from 7 million followers of 132 accounts known to spread abusive and misogynistic content showed a 69% increase in the number of newly created accounts following these channels.⁵ Andrew Tate and other misogynistic influencers/content creators have been raised in almost every workshop our Technology-Facilitated Abuse team has conducted recently with young people. Girls have said that they feel Tate's messages have been used by boys as a means to insult and bully them. They describe boys in their schools and friendship circles using phrases such as 'high value women' or 'A kitchen is where a woman belongs'. Many girls have said that they do not feel able to challenge this behaviour, because it has become so prevalent on social media, and has normalised misogynistic attitudes. Moreover, Tate's misogynistic messages have been packaged in a 'meme-able' and accessible format for young boys. The boys we have talked with in workshops have spoken about how aspirational Tate is, as a 'success coach.' His videos are often styled as 'self-help' by including 'dating' advice, how to make money and encouraging boys to be ambitious.⁶ Tate's reach about young boys appears to be huge - research by Hope Not Hate has found that 8 in 10 boys aged between 16 and 17 had either read, listened to or watched content from Andrew Tate.⁷

In addition to domestic abuse and violent misogynistic content, NSPCC have reported on the presence of self-generated intimate images as a form of online harmful content for children. This can include images produced when a child is groomed online, as well as images shared between two children.⁸ Some forms of these images may not be classed as illegal, such as non-explicit or semi-nude images. Intimate image abuse disproportionately impacts women and girls - for all forms of intimate image abuse, a greater proportion of the reports to NSPCC's Childline come from girls, including threats to share sexual images.

Lastly, young people have reported the widespread prevalence of self-harming and eating disorder content on TikTok communities, as well as dangerous social media 'challenges' and cyber bullying. Content glamourising self-harming is incredibly harmful to young people, and often encourages young people to replicate self-harming behaviours, even providing advice on how to hide self-harming from parents and family members. Suicidal ideation and feelings of suicidality are much more common among victims of domestic abuse. 24% of the survivors Refuge supports have felt suicidal and 18% have made plans

⁵ <https://www.bbc.co.uk/news/technology-64804007>

⁶ <https://www.thetimes.co.uk/article/social-media-companies-profit-from-misery-spread-by-misogynistic-influencers-6bzb2q23>

⁷ Hope Not Hate (2023), available at: <https://www.independent.co.uk/news/uk/home-news/andrew-tate-influence-young-men-misogyny-b2283595.html>

⁸ NSPCC (2022), 'Children's experiences of legal but harmful content online,' <https://learning.nspcc.org.uk/media/2727/legal-but-harmful-content-online-helplines-insight-briefing.pdf>

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to end their life,⁹ and research by the Agenda Alliance has revealed that domestic abuse victims are three times more likely to have made a suicide attempt in the past year compared to those who have not experienced abuse.¹⁰ Currently, some platforms such as TikTok have systems in place to prevent the use of the search tool to find content related to self-harm or suicidal ideation (whilst platforms such as Twitter have no such restrictions). If terms such as 'self-harm' are searched on TikTok, no results will appear and the user will instead be signposted to support and resources. However, if a user were to search 's3lf h@rm,' they will then be shown videos with hundreds of thousands of views explicitly describing, and at times, showing self-harm. This work-around to circumvent blocking of content is widely known by young users of TikTok, and services should remain alert to changes in access to and the format of harmful content.

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

We are particularly concerned about the impact on children from accessing violent misogynistic online content, given the role misogyny plays in engendering societal norms about women and men's roles, and in normalising and minimising domestic abuse.

Hope Not Hate research has highlighted the difference in how girls and boys feel about Tate - 45% of men have a positive view of Tate, whilst just 1% of women aged 16 and 17 have a positive view.¹¹ This significant disparity suggests young women are being directly impacted negatively by Tate and the effect he has had on boys' behaviour. As outlined previously, girls have told us of a change in their male classmates' behaviours towards them as a result of engaging with Tate's content. Girls have said they have been insulted and harassed by boys and that sexist phrases are frequently used. This has also been reflected in calls to Childline, with one 13-year-old girl reporting that "all the boys" in her class talk about Mr Tate:

"They are so influenced by him. They started picking on me and some of my friends because we are girls wanting to become things that 'aren't for women'. It's made me feel like I'll never get into my chosen field considering people like them will be in the future generation."¹²

⁹ Aitken, Ruth and Munro, Vanessa (2018), 'Domestic abuse and suicide: exploring the links with refuge's client Base and work force,' London: Refuge.

¹⁰ Agenda Alliance (2023), 'Underexamined and underreported: Suicidality and intimate partner violence: Connecting two major public health domains.'

¹¹ Hope Not Hate (2023).

¹² Ibid.

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

School teachers have also raised concerns that vulnerable boys are being “groomed” by Tate and drawn into increasingly violent misogynistic content.¹³ As a feminist organisation, Refuge understands gender inequality, misogyny and sexism to be at the root of domestic abuse, being both causes and consequences of domestic abuse. The presence of huge “Manosphere” communities online and violent misogyny pervading young boys’ online lives is deeply concerning because of the role this plays in normalising behaviours and views which are permissive of, and even encourage, domestic abuse and other forms of violence against women and girls.

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)

No

Services should consider domestic abuse as an exacerbating risk factor which has an impact on the risk of harm to children in the UK. Children are now recognised as victims of domestic abuse in their own right (Domestic Abuse Act 2021), in recognition of the devastating impact experiencing and witnessing domestic abuse has on a child. The Office of the Children’s Commissioner estimates that 26.7% of all children in England aged 0 to 5 (1.1 million) and 25.3% of children in England aged 6 to 15 (1.6 million) live with an adult who has experienced domestic violence or abuse at some point in their lives,¹⁴ and that

¹³ <https://www.theguardian.com/society/2023/jan/07/andrew-tate-misogyny-schools-vulnerable-boys>

¹⁴ Children’s Commissioner (2018), ‘Estimating the prevalence of the ‘toxic trio,’ <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2018/07/Vulnerability-Technical-Report-2-Estimating-the-prevalence-of-the-toxic-trio.pdf>

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?

830,000 children experienced domestic abuse in their homes in the year ending April 2022.¹⁵ 62% of children exposed to domestic abuse were directly harmed; 28% of these children were physically harmed, 58% were emotionally abused, and 18% were neglected.¹⁶ It is therefore vital that services consider domestic abuse as a risk factor which carries serious harm for children in the UK.

Services should pay particular attention to design features of their platforms which may facilitate or encourage violence against women and girls. For example, young people have told us in workshops that they were not aware of the full functionality of the Meet Up feature on Snapchat. This feature allows other users to view their exact location. This is of particular concern for young people from families that are experiencing or have fled domestic abuse, as it could mean the perpetrator is able to determine the new location of the survivors. In addition, as per the model Code of Practice developed with women's and children's organisations, we recommend that risk assessments for child safety should be gendered. As part of risk assessment processes, services should give consideration to girls' age, gender as well as other possible protected characteristics may be identifiable through 'know your user' processes that are likely to affect the way they are targeted for and impacted by VAWG.

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]

¹⁵ Children's Commissioner (2022), 'Briefing: children, coronavirus and domestic abuse,' <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2020/04/cco-briefing-children-domestic-abuse-coronavirus.pdf>

¹⁶ SafeLives (2014), 'In plain sight: The evidence from children exposed to domestic abuse,' http://www.safelives.org.uk/sites/default/files/resources/In_plain_sight_the_evidence_from_children_exposed_to_domestic_abuse.pdf

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)

No

We agree online services should do more to ensure the accessibility of terms of service and public policy statements – including privacy policies – for children. This should include documents being consistently provided in age-appropriate formats and languages which can reach all young users, such as British Sign Language, languages other than English, Easy read and large print. TikTok have recently created a “Teen’s Guide” for their terms of service, which is a useful tool that could be replicated more widely across other services.

In addition, services must be aware of the need to ensure settings and functionalities are better understood by young users. The example provided in answer to Question 9 exemplifies this – young people are using features such as Meet Up on Snapchat with little awareness of their full functionality.

Question 12: How do terms of service or public policy statements treat ‘primary priority’ and ‘priority’ harmful content?¹⁷

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)

No

¹⁷ See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

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

The young people who have attended Refuge workshops on online safety have said that they do not know how to report, or more frequently, that they do not feel there is any point in reporting content as they believe there would be few consequences for perpetrators. Providers should ensure their reporting processes are child-friendly and encourage younger users to feel confident in reporting abusive and harmful content to platforms. Reporting and complaints mechanisms should signpost to further support for children, including to domestic abuse and VAWG support services such as the National Domestic Abuse Helpline, Refuge tech safety website and Childline. Services should work in collaboration with specialist VAWG services to bring childrens' experiences into the design of reporting systems, and consideration should be given to reporting processes for non-users such as teachers or family friends and support services. Please refer to our response to the call for evidence on illegal content for further recommendations on improving reporting and complaints mechanisms for child victims of VAWG.

In addition, dispute resolution procedures must be fair, transparent, and easy to use. They must not discriminate between users, introduce bias, or be applied inconsistently. Services must remain conscious that children may not be able to access dispute resolution procedures and offer alternative mechanisms for children to raise issues.

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]

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)

No

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)?

Platforms need to prioritise responses to harmful content children encounter on their platforms. Young people have told us that they are often coming across extremely violent media and images on these platforms and that after reporting this content, they find that nothing is done and receive no response from the service. A timely and robust response is required to harmful material reported by children and third parties such as VAWG and child support services. We also echo the model Code of Practice's recommendations on best practice in responding to VAWG content (chapter 5) and content moderation (chapter 6), particularly with regards to the actions services must take on content which is not deemed to be illegal but is considered to break their Terms of Service, Community Guidelines, or is considered a new form of VAWG, as soon as it is identified. Acceptable actions on a piece of content which violates a provider's Terms of Service can include removal of content, demonetising content, suppressing content in recommender tools, termination or suspension of the account and limiting the number of posts over a given time period.

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 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)

No

Services should be attuned to the role of algorithms in pushing misogynistic content to young male users. Young users, particularly boys, are led to increasingly extreme and violent content to ensure they continue to be engaged and remain on the platform. Various journalistic investigations have illustrated the role of algorithms in spreading online misogyny. A 2022 Observer investigation revealed how a teenage user who watched videos aimed at male users – such as a TikTok discussing how men ‘don’t talk about their feelings’ – then started to receive suggestions of content which include Tate

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)?

videos, without 'liking' or searching for any content proactively.¹⁸ A BBC investigation in 2021 also highlighted how male users who had used abusive language about women were, just a week later, receiving recommended pages to follow on Facebook and Instagram which were almost exclusively misogynistic.¹⁹ Some of this content involved sexual violence, content condoning rape, harassment and gendered violence.

As per the model VAWG Code of Practice, we recommend that services ensure, and be able to demonstrate, that their systems are safe by design and take a preventative approach. This should include ensuring that algorithms used on the service do not cause foreseeable harm through promoting hateful content or by suggesting material that is in contravention of the service's own Terms and Conditions - for example by rewarding misogynistic influencers with greater reach, causing harm both by increasing reach and engagement with a content item. When considering the weighting of factors to promote content, care should be taken to ensure that there are no side-effects for example from heavily weighting user engagement (which says nothing about whether content is good or bad, just that it elicits a strong response). Furthermore, services should allow users to make complaints about the way recommender algorithms work, and moderation processes should include imposing limits on the spread of content via recommender algorithms.

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)

No

Improvements to reporting and content moderation systems are crucial to deliver greater protection for children online. As outlined in response to previous questions, children and young users have expressed concerns at the availability of harmful content on platforms which often goes unmoderated. Some young people have told us they do not wish to go on platforms such as TikTok because they do not want to see violent videos and content, and that despite putting in place filters to block this content, these often do not appear to work. In our [Unsocial Spaces](#) and Marked As Unsafe reports, we outline in greater detail the barriers and challenges survivors face in [reporting](#) domestic abuse-related content to social media platforms. Services must take urgent steps to improve the response time to

¹⁸ <https://www.theguardian.com/technology/2022/aug/06/revealed-how-tiktok-bombards-young-men-with-misogynistic-videos-andrew-tate>

¹⁹ <https://www.bbc.co.uk/news/uk-58924168>

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

content moderation. Many users are left waiting weeks, months or even years for a reply from services after flagging seriously harmful content. Services must have in place clear timeframes for action against flagged content, in line with the good practice outlined in the model VAWG Code of Practice (section 5). It is also vital that services have in place sufficient numbers of trained moderators who are able to review VAWG content, proportionate to the service's size, growth and the risk of harm on their platforms. An element of human oversight in content moderation will always be needed – it is likely that AI moderators would fail to identify the nuances and contextual nature of domestic abuse and other forms of violence against women and girls given such abuse is often highly subjective in nature to the survivor/s and perpetrator/s.

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)

No

Moderating staff must be appropriately and regularly trained and educated on VAWG and child protection, including new and emerging forms of harms. Services must consider assigning specific types of VAWG content to moderators trained in their specialist subjects, on related language and cultural context considerations, to ensure they are able to review the content consistently, in a timely manner and to provide appropriate support and onward signposting to victims. Services should also provide holistic support to moderators who are responding to harmful content, in recognition of the psychological impacts of the exposure to this content i.e. vicarious trauma. Staff should be supported and safeguarded by management – this could, for example, include mental health support and regular clinical supervision.

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)

No

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?

Young users have told us that for every post they have reported for action, they encounter countless other harmful pieces of content. From discussions we have held with young people, it is clear that content that is harmful to children is rarely removed by services. This echoes Refuge research on the response from platforms to domestic abuse-related content. 35% of survivor surveyed who received a response from a platform they reported domestic abuse-related content to said that the company did nothing in response to their report. Over half of survivors (53%) were informed by the service that the content did not breach their safety guidelines, despite many platforms including targeted harassment, threats of violence and intimate image abuse within their community standards. In other instances, survivors supported by Refuge have been informed that the content they have reported has been 'lost', so no further action can be taken. A small number of survey respondents said the company responded more positively, by either removing the post or content reported by the survivor (12%) or closing the perpetrator's account permanently (12%).²⁰ Please refer to our response to Question 15 and the model Code of Practice (section 6) for further detail on appropriate responses platforms should take to content that is harmful to children.

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]

²⁰ See Marked As Unsafe for further detail on how domestic abuse behaviours are included in service's community standards.

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?

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]