

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?</p>	<p><i>Is this response confidential? – N</i></p> <p>Consultation: Ofcom's proposed plan of work 2023/24</p> <p>Samaritans is the UK and Ireland's largest suicide prevention charity. We respond to a call for help every ten seconds and, in 2021, Samaritans volunteers spent over one million hours supporting people who called us for help.</p> <p>Over the last three years we have developed a hub of excellence in suicide prevention and the online environment with the aim of minimising access to harmful content and maximising opportunities for support. Our Online Excellence Programme includes industry guidelines for responding to self-harm and suicide content, an advisory service for sites and platforms offering advice on responding to self-harm and suicide content, a research programme exploring what makes self-harm and suicide content harmful and for whom, and a hub of resources helping people to stay safe online.</p> <p>Do you have any comments on Ofcom's proposed Plan of Work 2023/24?</p> <p>We understand that much of Ofcom's remit for the 2023/24 period will be determined by the outcomes of the Online Safety Bill. However, when thinking about what Ofcom should prioritise over the 2023/24 period, we are particularly concerned about harmful suicide and self-harm content online. This can include content that encourages or assists suicide or self-harm by another person: information, instructions and advice on methods of self-harm and suicide, and content that portrays self-harm or suicide as positive or desirable. This content is easily accessible on forums, factual websites and through search engines.</p>

Access to Harmful Content

Forums hosting user-to-user generated content are incredibly dangerous without appropriate moderation and must be accountable for the content that they host; Ofcom needs to ensure that sites have measures in place to protect users from harmful suicide and self-harm content and an accessible flagging system in place. Search engines also play a role in helping people find content and around methods of harm. Whilst some search engines have taken positive steps by adding signposting information to harmful searches, there are still multiple dangers posed by the search functionality which can push individuals towards harmful content. Ofcom must ensure that search engines do not have functionalities which push users towards harmful content. It is vital that Ofcom uses the powers at its disposal to ensure that users are protected from all harmful online suicide and self-harm content and that platforms and search engines are held to account where appropriate measures are not in place.

Enforcement of Guidelines and Terms and Conditions

Ofcom should place an emphasis on ensuring that websites have transparency around their guidelines and terms and conditions. Our industry guidelines recommend that users should be provided with clear and accessible community guidelines about what content is allowed on the site. They should also be given step-by-step information including how to make a report and what action may be taken. This information should be clearly displayed to new users, and existing users should be regularly reminded, empowering them to report any content that concerns them.

Reporting Processes

Ofcom should also prioritise improving reporting processes on websites so that harmful content can be identified and removed, including ensuring that all sites which host user generated content have a process in place. Our industry guidelines include suggestions for accessible reporting processes. For small sites this

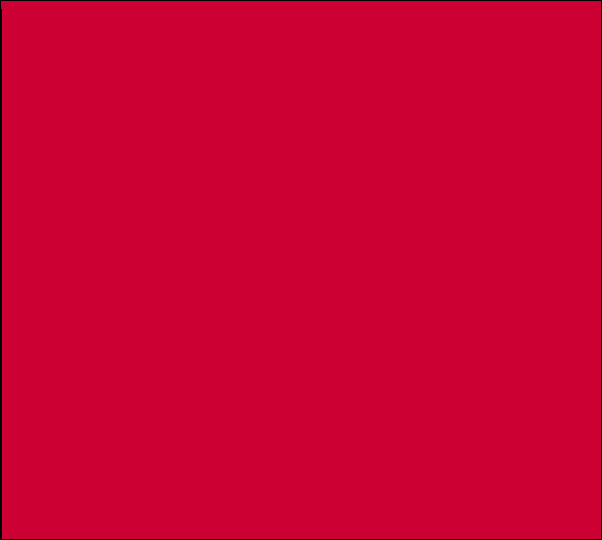
may be a dedicated email or reporting form. Larger sites may implement more sophisticated reporting functions, such as self-harm and suicide content specific reporting categories and trusted flagger functions, whereby credible organisations and users with a track record of making responsible and accurate reports are able to have their reports fast-tracked.

Language around reporting functions for self-harm and suicide should also be treated with caution and sensitivity. Quite often what a person posts about suicide or self-harm is done without malicious intent, despite it potentially being harmful to other users. With this in mind, other users may not report such content to avoid the person posting falling foul of moderators. The current lack of self-harm and suicide specific reporting categories can also deter users from reporting content. For example, if the categories don't feel as relevant or are more associated with other types of online harms, such as 'abusive/offensive content'. We therefore encourage Ofcom to establish clear guidelines on suicide and self-harm content for hosts to refer to. These should include guidance on reporting processes and guidance around distinguishing between malicious and innocuous content.

When handing reports and complaints, Ofcom should ensure that platforms have user redress and victim support measures, policies, and systems in place. These must be easily locatable and usable for users.

Video-on-Demand Services

In addition to our concerns with the online environment, we would also like to see Ofcom's year plan put a greater focus on regulating video-on-demand (VOD) service as the Media Bill goes through Parliament. In our experience, some video on demand services have chosen to be regulated by the least stringent regulatory regime in their geographical footprint by nominally stating that they are 'based' in the relevant territory. It is crucial that any on VoD services that include suicide and self-harm content and are available to UK viewers abide by domestic regulations. We hope that the new law will mean Ofcom has the power to designate



services outside of the UK based on risk of potential harm. Given the established evidence base on harmful portrayals of suicide and self-harm, this power should ensure that all suicide and self-harm content served to UK audiences is within UK jurisdiction, subject to UK audience protection standards.