

Internet Matters



Consultation Title	Consultation: New priority offences - serious self-harm and cyberflashing
Organisation	Internet Matters



Responder Type

organisation

Do you agree with the proposal to categorise suicide and self-harm as a single kind of illegal harm? Please provide the underlying arguments and evidence that supports your views.

Internet Matters welcomes Ofcom's work to update the Illegal Harms Codes to reflect the risks posed by self-harm content and cyberflashing. Ensuring that the framework reflects the evolving nature of online harms is an important step in ensuring that the Online Safety Act can effectively deliver on its objective of protecting users, particularly children, from harm online.

We broadly agree with the proposal to categorise suicide and self-harm as a single kind of illegal harm, recognising that these harms often overlap in how they manifest online and may share common risk factors. However, we would emphasise the importance of maintaining sufficient nuance in how these harms are understood and addressed in practice, particularly in the context of children's experiences.

In particular, self-harm content is often more context-dependent and ambiguous than suicide-related content, and may include material that sits across a spectrum from harmful to recovery-focused. As highlighted in guidance from organisations such as the Samaritans, clear distinctions between harmful and supportive content can be difficult to draw in practice (Source: Samaritans, Understanding self-harm and suicide content). Clear guidance will therefore be important to support services in distinguishing between harmful and supportive content.

Overall, we support the proposed approach provided that implementation guidance ensures clarity for services and preserves important distinctions in how these harms present and affect children. This is especially important as 6% of children aged 13-17 have come across suicide and self-harm content online, according to our November 2025 Internet Matters Pulse data.

Do you agree with the risk factors proposed for the risk profiles for suicide and self-harm? Please provide the underlying arguments and evidence that supports your views.

We broadly support the proposed risk factors for suicide and self-harm. In particular, inclusion of functionalities such as group messaging, direct messaging and commenting reflects how these harms can be facilitated through interactive and social features.

However, we would encourage Ofcom to ensure that implementation guidance makes clear that, while suicide and self-harm may share common risk factors, the ways in which harm manifests can differ in practice. As the Online Safety Act Network and other civil society organisations have noted, suicide-related content may be more likely to involve instructional material, while self-harm-related harms may be more closely linked to peer dynamics, pressure and harmful interactions in one-to-one or small-group environments. If suicide and self-harm are considered as one issue, the significant differences between the sorts of behaviour that would lead to encouragement of either would need to be made explicit.

Do you agree with the risk factors proposed for the Risk Profiles for cyberflashing? Please provide the underlying arguments and evidence that supports your views.

Internet Matters broadly supports the proposed risk factors for cyberflashing, including the mention of social media and messaging services, user profiles, direct messaging, ephemeral messaging, and posting images or videos. These reflect our findings on the ways in which cyberflashing commonly occurs in practice. Our 2023 report, *It's Really Easy to Go Down That Path*, found that 11% of children aged 13-16 had experienced being sent a nude image they did not want, and that Snapchat was the most frequently reported platform where this occurred: 58% of teenagers who had received an unwanted nude image said they had done so on Snapchat. Girls were disproportionately affected: 73% of girls aged 13-16 who had received an unwanted nude image said this had happened on Snapchat, compared to 39% of boys the same age.

Do you have any views on our proposed changes to the suicide and self-harm section of the Register of Risks? Please provide the underlying arguments and evidence that supports your views.

Internet Matters broadly supports Ofcom's proposed updates to the Register of Risks for suicide and self-harm. We welcome Ofcom's continued focus within the Register on how harms manifest through service functionalities and user interactions, such as messaging, recommendation systems and community features, which can contribute to the spread and amplification of harmful content.

We also welcome Ofcom's acknowledgment within the Register that generative AI can play a role in enabling harmful content. However, given the rapid development of these technologies and their increasing relevance to children's online experiences, we would encourage Ofcom to prioritise further work to more systematically incorporate AI-enabled risks within the Register of Risks, ensuring it remains an accurate and up-to-date reflection of how harms are evolving in practice.

Do you have any views on our proposed changes to the cyberflashing section of the Register of Risks? Please provide the underlying arguments and evidence that supports your views.

We broadly agree with the proposed updates to the Register of Risks for suicide and self-harm. We would reiterate the importance of ensuring that the Register continues to evolve to reflect emerging forms of harm, particularly those enabled by generative AI, as set out in our response to Question 4.

Do you have any views on our proposed updates to the self-harm section of the ICJG? Please provide the underlying arguments and evidence that support your views.

No response provided.

Do you have any views on our proposed updates to the cyberflashing section of the ICJG? Please provide the underlying arguments and evidence that support your views.

No response provided.

Do you have any views on our proposed updates to the Record Keeping and Review Guidance? Please provide the underlying arguments and evidence that support your views.

No response provided.

Do you have any comments on our proposed approach to updating the Codes, in light of the creation of the two new priority offences? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the Governance and Accountability measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the Content and Search Moderation measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the Reporting and Complaints measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the Recommender Systems measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the Search Design, Functionalities and User Controls measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any views on the proposed changes to the application of the User Controls measures or the impacts we have identified? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you agree with our assessment of the additional impacts of our proposals in respect of the measures in the June 2025 Additional Safety? Please provide the underlying arguments

and evidence that supports your views.

No response provided.

Do you agree with our assessment of the combined impacts of our proposals set out in the Combined Impact Assessment? Please provide the underlying arguments and evidence that supports your views.

No response provided.

Do you have any other feedback on our proposals? Please provide the underlying arguments and evidence that supports your views

Internet Matters recognises that this consultation is intended as a targeted update, and we are broadly supportive of the approach taken. However, we would highlight three cross-cutting considerations for Ofcom as it continues to develop the framework.

First, the importance of recognising differential risks for children, particularly those who are vulnerable. Our research consistently shows that some groups of children are disproportionately affected by online harms, including image-based abuse and harassment. For example, our 2023 report, *It's Really Easy to Go Down That Path*, found that 14% of vulnerable girls aged 13-16 have had a sexual image non-consensually shared with them, compared to 3% of non-vulnerable girls, while 11% of vulnerable girls reported that someone had threatened to share a nude image of them without their permission, compared to 2% of non-vulnerable girls.

We define vulnerable children as those who receive Special Educational Needs (SEN) support, have a mental or physical health condition requiring professional support, or have an Education, Health and Care Plan (EHCP), while recognising that definitions of vulnerability can vary.

While demographics of users including vulnerability and age are not service-level risk factors (in the same way as platform functionalities), we would encourage Ofcom to ensure that its guidance clearly reflects which groups of children are most at risk, to support services in taking proportionate and targeted action.

Second, the need to continue strengthening the framework's response to emerging forms of harm, particularly those enabled by generative AI. We welcome Ofcom's acknowledgment that generative AI can play a role in enabling harmful content, including image-based abuse. However, given the speed of technological development and increasing use of these tools by children, we would encourage Ofcom to prioritise further work to incorporate these risks more systematically across its Codes and associated guidance.

Our research on children's use of AI chatbots, published in our 2025 report *Me, Myself and AI*, found that children are increasingly using these tools for a range of purposes, including seeking advice and for companionship. While these systems can offer benefits, they also present risks, including exposure to inaccurate or harmful advice, over-reliance on systems perceived as authoritative, and the blurring of boundaries between informational and emotional support.

In the interim, greater clarity for services on how these risks should be assessed within existing frameworks would be beneficial.

Finally, the importance of ensuring that the framework remains responsive to the evolving nature of online harms. While this consultation represents a relatively light-touch update, the harms it

addresses, particularly those relating to image-based abuse and self-harm, are dynamic and shaped by changing technologies, behaviours and social norms. Ongoing monitoring and iterative updates will therefore be essential to ensure that the framework continues to provide an effective basis for protecting children.