

Louis Barrett



Consultation Title	Consultation: New priority offences - serious self-harm and cyberflashing
Individual	Louis Barrett



Responder Type

individual

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.

Combining related harms may reduce duplication. However, the framework is becoming over-engineered, as each legal change now requires updates across multiple documents and records rather than a simple adjustment to the assessment.

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.

Agree with the proposed factors. Our main concern is that Ofcom's own Year One report showed many providers already struggled to meet the existing risk assessment requirements, which suggests the framework is already highly complex.

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.

Broadly agree with the proposed factors for cyberflashing. However, the wider regime is becoming over-engineered, with each change spreading across guidance, profiles, codes, and record-keeping requirements.

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.

No response provided.

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.

No response provided.

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.

We do not object in principle. However, the wider framework is becoming over-engineered. Each legal change now triggers updates across multiple linked Ofcom documents and internal records. Ofcom's Year One report showed many providers already struggled to meet the existing risk assessment requirements, which suggests simplification is needed.

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.

We do not object in principle. However, this is another example of a single change spreading across multiple parts of the compliance framework. The regime is becoming over-engineered, with growing administrative burden and document complexity

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

The main feedback is that the framework is becoming overly segmented and over-engineered. A focus on merging closely related content types is helpful, but it also risks expanding a framework in areas where there are already existing problems with documentation and practical application.

Ofcom's Year One report found that many providers failed to include the information needed to demonstrate that they had met the relevant requirements. In our view, that points to a wider problem of excessive segmentation. When providers are already missing existing record-keeping and risk assessment requirements, there is a legitimate concern that the compliance structure has become too documentation-heavy and difficult to navigate in practice. The priority should therefore be simplification, consolidation, and clearer operational guidance, so that the burden falls on identifying and managing risk rather than maintaining a labyrinth of paperwork.