

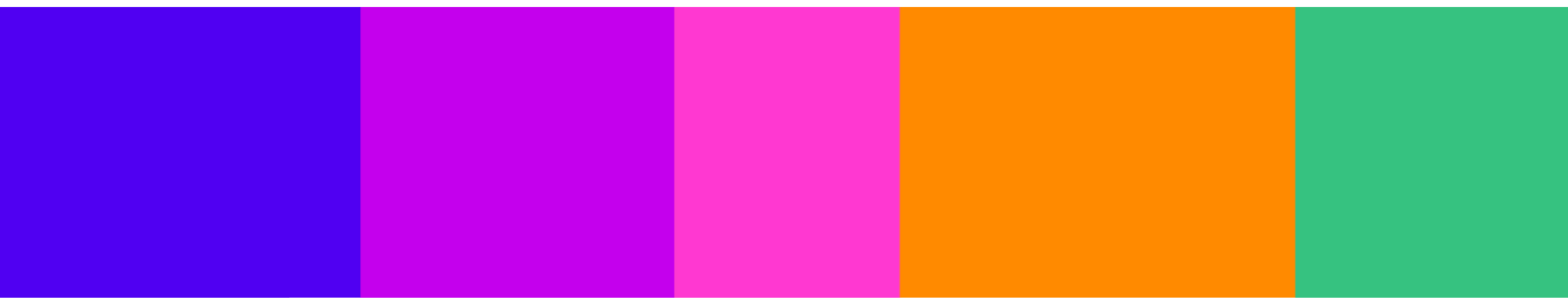
Your response

Volume 2: The causes and impacts of online harm

Ofcom's Register of Risks

Question 1:	
i)	Do you have any comments on Ofcom's assessment of the causes and impacts of online harms?
Response:	
ii)	Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 2:	
i)	Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer.
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	



Volume 3: How should services assess the risk of online harms?

Governance and accountability

Question 3:	
i)	Do you agree with our proposals in relation to governance and accountability measures in the illegal content Codes of Practice?
Response:	
ii)	Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 4:	
i)	Do you agree with the types of services that we propose the governance and accountability measures should apply to?
Response:	
ii)	Please explain your answer.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 5:	
i)	Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to requiring services to have measures to mitigate and manage illegal content risks audited by an independent third-party?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 6:

- i) Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to tie remuneration for senior managers to positive online safety outcomes?

Response:

- ii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Service's risk assessment

Question 7:

- i) Do you agree with our proposals?

Response:

- ii) Please provide the underlying arguments and evidence that support your views.

Response:

- iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Specifically, we would also appreciate evidence from regulated services on the following:

Question 8:

- i) Do you think the four-step risk assessment process and the Risk Profiles are useful models to help services navigate and comply with their wider obligations under the Act?

Response:

- ii) Please provide the underlying arguments and evidence that support your views.

Response:

- iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Question 9:	
i)	Are the Risk Profiles sufficiently clear?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Do you think the information provided on risk factors will help you understand the risks on your service?
Response:	
iv)	Please provide the underlying arguments and evidence that support your views.
Response:	
v)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Record keeping and review guidance

Question 10:	
i)	Do you have any comments on our draft record keeping and review guidance?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 11:	
i)	Do you agree with our proposal not to exercise our power to exempt specified descriptions of services from the record keeping and review duty for the moment?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Volume 4: What should services do to mitigate the risk of online harms

Our approach to the Illegal content Codes of Practice

Question 12:

- i) Do you have any comments on our overarching approach to developing our illegal content Codes of Practice?

Response: For adult service websites the following harm prevention mechanisms could be applied:

Human and AI moderation of content including complex data scanning software, google content safety machine learning, algorithms and fingerprinting of all content.

Multi-layered safety/verification processes including ID, age and consent verification measures, including 'know-your-customer' processes, and mandate use of identifiable payment methods.

Proactive removal of suspicious content including:

Ads created from a VPN/IP address with a bad score.

Ads created outside the UK.

Disabling unidentified payments.

Blocking backlisted phones.

Blocking multiple account/advert holders.

Identifying Child Sexual Abuse Material, use of certain visual codes or banned words.

The use of stock images

The cost of services offered

The property environment in which sexual services are being sold

Proactive reporting cases to the **police** and data sharing in an easily accessible manner.

The regulation of ASWs should include robust **prevention** measures:

- Standardised, robust and continuous **verification** checks of adverts on ASW platforms, including:
 - **ID and age verification;**
 - checking for duplicates of adverts (including photos used, text descriptions and mobile numbers);
 - before an advert goes live, the ASW should have to make contact with the worker, both to verify their identity and to make sure someone else is not in possession of their phone or advert, including a mechanism for asking for help/support;
 - **verification of financial data** including use of traceable payment methods.
- **Proactive identification** of cases of MSHT and/or suspicious activity through **AI moderation** and **human review of content***, including:

- Flagging of multiple adverts under one account (or one form of ID//phone number/payment method);
- suspicious bank accounts or transactions;
- the text of an advert: including use of Google translate, certain emojis (codes for risky/illegal sexual behaviour), copied text from other adverts and/or poor language use, and suspicious phrase use (such as 'girls changing, new girls weekly');
- advertising of risky services (such as bareback, sex without a condom); low prices;
- and analysing the pictures relating to the advert for stock images or image duplicates.
- **Clear reporting measures** including designated support pages, partnerships with modern slavery NGOs and pop-ups informing users of their reporting responsibilities.
- **Mandatory and proactive sharing of data** between ASWs and the police regarding suspected exploitation cases, including the sharing of:
 - financial data;
 - IP addresses;
 - phone numbers;
 - messages and advert details.
- **Robust & accessible safeguarding** mechanisms, including:
 - partnership work with NGOs to support survivors of exploitation;
 - embedded referrals to ASW support pages;
 - an on-hand support team;
 - information on MSHT and what to do if you suspect someone is being exploited;
 - and a general Trust and Safety Centre to protect all users of their platforms.
- **Deterrence** tools which discourage traffickers from operating on ASWs for example, increased prosecutions and sentences for convicted traffickers and pop-up deterrence messaging for platform users.

This is research findings from the following project:

Keighley, Rachel; Sanders, Teela (2023). The role of adult service websites in addressing modern slavery. University of Leicester. Collection. <https://doi.org/10.25392/leicester.data.c.6630017.v3>

ii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response: no

Question 13:

i)	Do you agree that in general we should apply the most onerous measures in our Codes only to services which are large and/or medium or high risk?
	Response: adult service platforms can be small but still have the same risks attached to them so if they are not included then potential sexual exploitation on smaller platforms could escalate at these websites are not being monitored. So adult service websites may be a special case.
ii)	Please provide the underlying arguments and evidence that support your views.
	Response: there are approximately 260 platforms which advertise and facilitate adult services in the UK – only a few of these are large. So if the rules apply to only the few large ones then this could cause an effect whereby traffickers and exploiters move to only the smaller ones.
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
	Response: no

Question 14:

i)	Do you agree with our definition of large services?
	Response: With the caveat above for a special recognition of adult service websites
ii)	Please provide the underlying arguments and evidence that support your views.
	Response: as above
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
	Response: no

Question 15:	
i)	Do you agree with our definition of multi-risk services?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 16:	
i)	Do you have any comments on the draft Codes of Practice themselves?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 17:	
i)	Do you have any comments on the costs assumptions set out in Annex 14, which we used for calculating the costs of various measures?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Content moderation (User to User)

Question 18:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Content moderation (Search)

Question 19:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Automated content moderation (User to User)

Question 20:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 21:	
i)	Do you have any comments on the draft guidance set out in Annex 9 regarding whether content is communicated 'publicly' or 'privately'?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Do you have any relevant evidence on:

Question 22:	
i)	Accuracy of perceptual hash matching and the costs of applying CSAM hash matching to smaller services;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	

iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 23:	
i)	Ability of services in scope of the CSAM hash matching measure to access hash databases/services, with respect to access criteria or requirements set by database and/or hash matching service providers;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 24:	
i)	Costs of applying our CSAM URL detection measure to smaller services, and the effectiveness of fuzzy matching for CSAM URL detection;;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 25:	
i)	Costs of applying our articles for use in frauds (standard keyword detection) measure, including for smaller services;
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 26:	
i)	An effective application of hash matching and/or URL detection for terrorism content, including how such measures could address concerns around 'context' and freedom of expression, and any information you have on the costs and efficacy of applying hash matching and URL detection for terrorism content to a range of services.
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Automated content moderation (Search)

Question 27:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

User reporting and complaints (U2U and search)

Question 28:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Terms of service and Publicly Available Statements

Question 29:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 30:	
i)	Do you have any evidence, in particular on the use of prompts, to guide further work in this area?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Default settings and user support for child users (U2U)

Question 31:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 32:	
i)	Are there functionalities outside of the ones listed in our proposals, that should explicitly inform users around changing default settings?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Question 33:

- | | |
|----|---|
| i) | Are there other points within the user journey where under 18s should be informed of the risk of illegal content? |
|----|---|

Response:

- | | |
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| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
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Response:

Recommender system testing (U2U)

Question 34:

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| i) | Do you agree with our proposals? |
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Response:

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| ii) | Please provide the underlying arguments and evidence that support your views. |
|-----|---|

Response:

- | | |
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| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
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Response:

Question 35:

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| i) | What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing? |
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Response:

- | | |
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| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
|-----|--|

Response:

We are aware of design features and parameters that can be used in recommender system to minimise the distribution of illegal content, e.g. ensuring content/network balance and low/neutral weightings on content labelled as sensitive.

Question 36:

- | | |
|----|--|
| i) | Are you aware of any other design parameters and choices that are proven to improve user safety? |
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Response:

- | | |
|-----|--|
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
|-----|--|

Response:

Enhanced user control (U2U)

Question 37:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 38:	
i)	Do you think the first two proposed measures should include requirements for how these controls are made known to users?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 39:	
i)	Do you think there are situations where the labelling of accounts through voluntary verification schemes has particular value or risks?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

User access to services (U2U)

Question 40:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Do you have any supporting information and evidence to inform any recommendations we may make on blocking sharers of CSAM content? Specifically:

Question 41:	
i)	What are the options available to block and prevent a user from returning to a service (e.g. blocking by username, email or IP address, or a combination of factors)?
Response:	
ii)	What are the advantages and disadvantages of the different options, including any potential impact on other users?
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 42:	
i)	How long should a user be blocked for sharing known CSAM, and should the period vary depending on the nature of the offence committed?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

There is a risk that lawful content is erroneously classified as CSAM by automated systems, which may impact on the rights of law-abiding users.

Question 43:	
i)	What steps can services take to manage this risk? For example, are there alternative options to immediate blocking (such as a strikes system) that might help mitigate some of the risks and impacts on user rights?
Response:	
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Service design and user support (Search)

Question 44:	
i)	Do you agree with our proposals?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Cumulative Assessment

Question 45:	
i)	Do you agree that the overall burden of our measures on low risk small and micro businesses is proportionate?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Question 46:	
i)	Do you agree that the overall burden is proportionate for those small and micro businesses that find they have significant risks of illegal content and for whom we propose to recommend more measures?
Response: yes	
ii)	Please provide the underlying arguments and evidence that support your views.
Response: the smaller websites may decide they cannot attend to the new regulations and may close but this will mean business will gravitate to a small number of larger adult platforms which can be monitored and assessed more easily.	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: no	

Question 47:	
i)	We are applying more measures to large services. Do you agree that the overall burden on large services proportionate?

Response: yes as these services get the most users and have the most resources to address issues
ii) Please provide the underlying arguments and evidence that support your views.
Response: the two large adult service websites are multi-million pound businesses which have the ability to address any harms passing through their sites.
iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: no

Statutory Tests

Question 48:	
i)	Do you agree that Ofcom's proposed recommendations for the Codes are appropriate in the light of the matters to which Ofcom must have regard?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Volume 5: How to judge whether content is illegal or not?

The Illegal Content Judgements Guidance (ICJG)

Question 49:

i) Do you agree with our proposals, including the detail of the drafting?

Response:

ii) What are the underlying arguments and evidence that inform your view?

Response:

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Question 50:

i) Do you consider the guidance to be sufficiently accessible, particularly for services with limited access to legal expertise?

Response:

ii) Please provide the underlying arguments and evidence that support your views.

Response:

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Question 51:

i) What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements?

Response:

ii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response:

Volume 6: Information gathering and enforcement powers, and approach to supervision.

Information powers

Question 52:	
i)	Do you have any comments on our proposed approach to information gathering powers under the Online Safety Act?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Enforcement powers

Question 53:	
i)	Do you have any comments on our draft Online Safety Enforcement Guidance?
Response:	
ii)	Please provide the underlying arguments and evidence that support your views.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	

Annex 13: Impact Assessments

Question 54:	
i)	Do you agree that our proposals as set out in Chapter 16 (reporting and complaints), and Chapter 10 and Annex 6 (record keeping) are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English?
Response:	
ii)	If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.
Response:	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	