

Response to the Ofcom consultation: protecting children from harms online

11 July 2024

This response to Ofcom was written by a group of UK survivors of child sexual abuse and exploitation.

The [Brave Movement](#) is a global mobilisation of survivors, and our allies, focused on ending all forms of childhood sexual violence through targeted advocacy and campaigns. In the UK, Brave is a diverse group of survivors of childhood sexual violence, from all four nations, with lived experience of the various forms of sexual abuse. Many of us suffered through online and tech-assisted sexual abuse and exploitation. We know the subject intimately.

As a gathering of activists and not a full-time organisation with staff or budget, though some of us individually are highly skilled professionals working in this field, we find responding to the Ofcom document an important but extremely challenging opportunity.

This is not a reflection of our lack of insight but of the limitations on our capacity to access and contribute to your consultation process. A national network of UK survivors are waiting with hugely valuable insights, gained at great personal cost from their lived experiences. Ofcom should be aware there are many survivors' organisations, and thousands of individual survivors not even aware of this consultation, and certainly not empowered to respond.

We strongly recommend that Ofcom works proactively with survivors, hosting inclusive and trauma-competent workshops, to ensure their voices and the valid authority of their lived experiences are sensitivity incorporated into the consultation process.

Following the consultation on illegal codes of practice, which a number of survivor organisations and many others in civil societies responded to, Ofcom claimed to be implementing changes to its consultation process. It's still not

clear what they will be. Given many of the changes asked for were about its underlying approach to consultation, it's apparent that Ofcom has not taken into account these necessary changes, as the approach to online harm in this proposal is broadly similar. As civil society and survivors of childhood sexual violence, we are caught between a summary that is still 30 pages long but lacks some key detail and a 1,300 page full document with vast technical detail.

We need reassurance that the proposed changes in the illegal codes of practice will address the problems adequately, effectively and soon. We do not all have the technical expertise to comment in detail on the technical proposals. However, we can provide lived experience evidence around the harmful role of 'grooming' material. This material might not be flagged as harmful as much of the content would be conversational, but over time this is used to build up a relationship that is then abused by the perpetrator. We encourage the guidance on harmful content to address more closely online grooming, which we know through working with survivors of online violence around the world, is used as a tactic to enable online (and offline) sexual abuse to take place.

We encourage codes of practice focussing on designing initial protections in functionality of platforms, rather than solely output based approaches. Ofcom's proposals appear to be output based and therefore do not incentivise a service understanding the risk that functionality poses as part of their specific product offering. Instead, a general approach is taken, preventing the incentive for platforms to deploy proportionate advance mitigations. The measures relating to risks associated with direct, group and encrypted messages appear to focus on a young person taking action to stop harm rather than building a whole user experience and interaction that is safe by design. This risks subjecting young people to harmful content rather than preventing these potentially abusive interactions taking place in the first place.

At BRAVE UK our purpose includes amplifying the messages of other organisations in the field of abuse prevention. Accordingly:

We support the demands of 'Act on IICSA', the UK survivor-led campaign, hosted by The Survivors Trust, urging the UK Government to implement the recommendations of the Independent Inquiry in Child Sexual Abuse, which includes the key recommendation that the proposed CPA incorporates a specialised and dedicated Online Harms Unit.

BRAVE UK supports the recommendations given by NSPCC, including:

"We strongly urge Ofcom reconsiders its approach to minimum age limits in the Codes. Next steps must include setting out the range of options available to services, adding a specific requirement in the Codes, and incentivising innovation to increase the range of solutions available.

Ofcom should base Code of Practice Recommendations on what best practice should look like, including a greater use of harm prevention tools. Children and young people should directly inform a clear vision of what platforms which are safe by design for children would look like.

Ofcom must pre-empt the risk of harm increasingly migrating from public to private spaces and introduce robust measures for private messaging services now.

Through the risk assessment process, services should be required to assess the links between illegal and harmful content and to ensure they have clear systems in place which ensure this material is swiftly identified, properly reported, and that children have holistic protections and support."

BRAVE UK supports the entirety of the response of the UK Children's Commissioner.

BRAVE UK also supports the technical and lived-experience expertise of the MARIE COLLINS FOUNDATION.

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