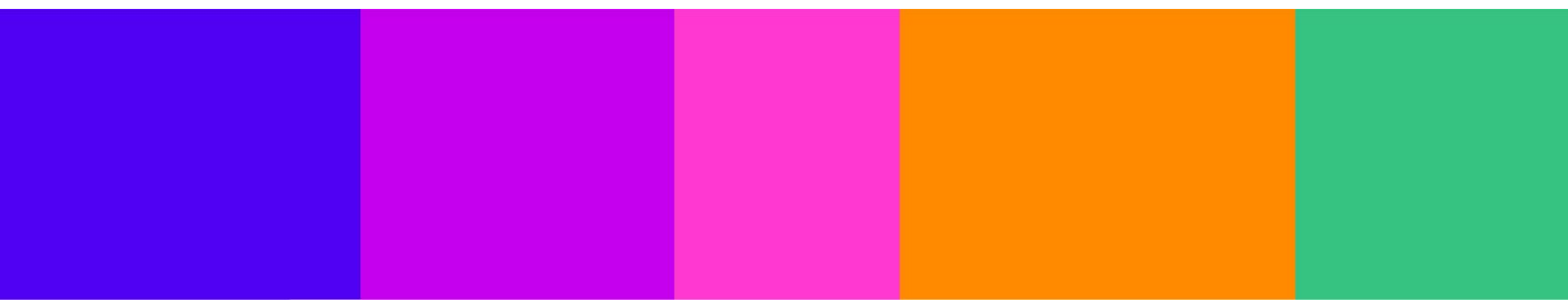




Consultation response form

Please complete this form in full and return to protectingchildren@ofcom.org.uk.

Consultation title	Consultation: Protecting children from harms online
Organisation name	Greater Manchester Combined Authority



Your response

Question	Your response
<p>Volume 2: Identifying the services children are using Children’s Access Assessments (Section 4).</p>	
<p>Do you agree with our proposals in relation to children’s access assessments, in particular the aspects below. Please provide evidence to support your view.</p> <ol style="list-style-type: none"> 1. Our proposal that service providers should only conclude that children are not normally able to access a service where they are using highly effective age assurance? 2. Our proposed approach to the child user condition, including our proposed interpretation of “significant number of users who are children” and the factors that service providers consider in assessing whether the child user condition is met? 3. Our proposed approach to the process for children’s access assessments? 	<p>Confidential? – N</p> <p>We agree with the assumption that “service providers should only conclude that children are not normally able to access a service where they are using highly effective age assurance”. In the absence of highly effective age assurance processes, it should be assumed that children can and are accessing a given digital service.</p>
<p>Volume 3: The causes and impacts of online harm to children Draft Children’s Register of Risk (Section 7)</p>	
<p>Proposed approach:</p> <ol style="list-style-type: none"> 4. Do you have any views on Ofcom’s assessment of the causes and impacts of online harms? Please provide evidence to support your answer. <ol style="list-style-type: none"> a. Do you think we have missed anything important in our analysis? 5. Do you have any views about our interpretation of the links between 	<p>Confidential? – N</p> <p>4. Broadly we agree with the relationship set out in Volume 3 on the causes and impact of online harm to children. The analysis of potential harms to children arising from online content appears to be thoroughly explored.</p> <p>However, greater clarity is needed regarding the differences between Primary Priority, Priority or Non-designated Content if this is to be applied and understood by providers. Table 7.1 is difficult to effectively review when this remains unclear.</p>

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<p>risk factors and different kinds of content harmful to children? Please provide evidence to support your answer.</p> <p>6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer.</p> <p>7. Do you have any views on our interpretation of non-designated content or our approach to identifying non-designated content? Please provide evidence to support your answer.</p> <p>Evidence gathering for future work:</p> <p>8. Do you have any evidence relating to kinds of content that increase the risk of harm from Primary Priority, Priority or Non-designated Content, when viewed in combination (to be considered as part of cumulative harm)?</p> <p>9. Have you identified risks to children from GenAI content or applications on U2U or Search services?</p> <p>a) Please Provide any information about any risks identified</p> <p>10. Do you have any specific evidence relevant to our assessment of body image content and depressive content as kinds of non-designated content? Specifically, we are interested in:</p> <p>a) (i) specific examples of body image or depressive content linked to significant harms to children,</p> <p>b. (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.</p> <p>11. Do you propose any other category of content that could meet the</p>	<p>We would question the decision to exclude certain categories of content in the Act’s definition of ‘primary priority harm’. In particular, we would consider ‘abuse and hate content’ and ‘violent content’ to constitute primary priority for the protection of children from harms online.</p> <p>With regard to Table 7.1 it should be made clear that, for the purposes of this guidance, misogyny is included within ‘abuse and hate’ content. While this is clear in the rest of the guidance it needs to be emphasised in the table.</p> <p>4a.</p> <p>Child Criminal Exploitation</p> <p>We have identified a potential gap in this analysis when it comes to the defining categories of illegal vs online harm in Volume 3 and the annexed ‘Illegal Harms Register’.</p> <p>We note that, Child Criminal Exploitation (CCE) is not defined in either document. This gives rise to a potential gap where a child is criminally exploited, and online spaces are used in this exploitation. For example, if a child is recruited into a drugs line as a runner via Discord or Telegram, or via online forums or platforms, and is then criminally exploited, this does not appear to be covered by illegal harms. Human trafficking may apply, but only if the exploiter facilitates the travel of the young person, and increasingly organised crime groups are avoiding actively arranging travel to circumvent their exposure to this offence.</p> <p>Intimate Partner Violence</p> <p>A significant number of young people are victims within intimate relationships. The guidance remains largely silent on using online tools as a means to further control and enable harm in a relationship - in this case to a young person. This includes the potential for online harassment which is already a growing issue and has the potential to rise exponentially through the growth of generative AI. While some of these issues are covered under bullying and misogyny within the guidance, it should be recognised that online content is often facilitating abuse within teenage relationships and this should be named as such. For example, while deepfakes are used to bully as set out in the guidance, they are very often used as a</p>

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<p>definition of NDC under the Act at this stage? Please provide evidence to support your answer.</p>	<p>means to abuse an individual who is with or left an abusive partner, similarly doxing is referred to within the context of bullying but again can be used as part of an abusive relationship. We recognise that some of this may be picked up in specific OFCOM guidance relating to violence against women and girls, however there needs to be read across throughout the different online harms guidance to avoid gaps.</p> <p>Violence</p> <p>The analysis around violent content in Volume 3 is comprehensive and we agree with the analysis contained therein.</p> <p>In addition, we would encourage Ofcom to consider how to regulate content that would not be defined as ‘violent content’ within the given definition, but that is related to and likely has an impact on desensitising children to violence. For example, online content displaying animals killing each other is prevalent online, and whilst this is a perfectly natural course of events, a good deal of this type of content would certainly not be broadcast before the watershed or be included in BBC wildlife documentaries. The filming of incredibly graphic scenes depicting carnivorous creatures ripping other animals to shreds in quite harrowing ways for entertainment is not natural and shows a lack of humanity towards the preyed-on animals. The comments sections often contain people complaining about the poor taste of these videos and there are mixed responses. This type of content needs more consideration because it may be that it contributes to desensitization, especially amongst very young children.</p> <p>Hateful content</p> <p>Young people typically have higher engagement with online platforms. The use of hateful language and hate crime against another person online can have a significant impact on that victim.</p> <p>It’s generally considered that online hate incidents and hate crime have increased in recent years and is more visible to people and society.</p> <p>Online platforms have an important role in monitoring what is said via their platforms to ensure that any hate crime can be reported, recorded and appropriately acted on.</p>

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	<p>Focusing on young people and education is one of the key pillars of the preventative response to tackling hate crime.</p> <p>If not removed online hate is usually more permanent and can be disseminated to a wider audience relatively easily. Often those who spread hate online use anonymous accounts to do so to avoid being identified.</p> <p>Some studies suggest that anonymity can embolden people to commit hate speech. There is a risk that online hate turns into more damaging real life violence further increasing the number of victims and the impact.</p> <p>In Greater Manchester, we've had recent feedback that some people, including young people, may not be aware of hate crime or what constitutes a hate crime online. Further clarity and communication targeted at young people would help.</p> <p>8. We would strongly recommend that violent content and pornographic content be considered in conjunction when considering cumulative harm in future evidence gathering work. We believe that the impact of violence in pornography has exceedingly high potential for cumulative harm to children. We refer to the Children's Commissioner's report on 'pornography's influence on harmful sexual behaviour among children' as evidenced in this case particularly section 1.1.3 on sexually violent content and 1.3.2 on the relationship between pornography and attitudes towards sexual violence.</p> <p>In addition, we would suggest that the cognitive impact and prevalence of pornography in young people's lives means that the impact of violent pornography is not limited to sexual violence but is likely to have a desensitising effect to all kinds of physical violence, especially gender-based violence.</p> <p>Readability and Comprehensibility of Guidance</p> <p>We commend Ofcom's commitment to delivering a full and comprehensive analysis of the causes and risks of online harms to children. With regards to the guidance set out in Volume 3, more thought needs to be given as to how the guidance is set out as it is dense and difficult to follow in places. Flow charts, graphics and tables are</p>

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	helpful aids in understanding the guidance and help to explain some of the more opaque passages of text.
<p>Volume 5 – What should services do to mitigate the risk of online harms</p> <p>Our proposals for the Children’s Safety Codes (Section 13)</p>	
<p>Proposed measures</p> <p>22. Do you agree with our proposed package of measures for the first Children’s Safety Codes?</p> <p>a) If not, please explain why.</p> <p>Evidence gathering for future work.</p> <p>23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?</p> <p>a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results from trialling or testing of measures.</p> <p>24. Are there other areas in which we should consider potential future measures for the Children’s Safety Codes?</p> <p>a) If so, please explain why and provide supporting evidence.</p>	<p>Confidential? – N</p> <p>We agree with the proposed user reporting measures and have nothing additional to note.</p>

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