

# Nextdoor: Consultation response form

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Please complete this form in full and return to [protectingchildren@ofcom.org.uk](mailto:protectingchildren@ofcom.org.uk).

|                           |   |
|---------------------------|---|
| <b>Consultation title</b> | Consultation: Protecting children from harms online |
| <b>Organisation name</b>  | Nextdoor  |



## Your response

| Question   | Your response   |
|--|---|
| <p><b>Volume 2: Identifying the services children are using<br/>Children’s Access Assessments (Section 4).</b></p>   |   |
| <p><b>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.</b></p> <ol style="list-style-type: none"> <li>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?</li> <li>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?</li> <li>3. Our proposed approach to the process for children’s access assessments?</li> </ol> | <p>Confidential? – N</p> <p><u><i>Background information on Nextdoor and Nextdoor users</i></u></p> <p>Nextdoor operates website <a href="http://www.nextdoor.com">www.nextdoor.com</a> and the Nextdoor web application (collectively known hereafter, “platform”) where users around the world turn daily to receive trusted information, give and get help, get things done, and build real-world connections with those nearby — users, businesses, and public services. By fostering these connections, both online and in the real world, Nextdoor builds stronger, more vibrant, and more resilient neighbourhoods. Today, nearly 100 million verified users (hereafter, “users”) rely on Nextdoor in more than 325,000 neighbourhoods across 11 countries.</p> <p>On Nextdoor, users are placed in a neighbourhood based on their address and automatically receive updates from nearby neighbours, businesses, and public services.</p> <p>Since Nextdoor launched in 2011, Nextdoor has required individuals to register with and use their real names and addresses on the platform to foster mutual accountability and ensure that connections and conversations are authentic.</p> <p>The UK is, outside of the USA, Nextdoor’s largest market: we are used by 1 in 4 UK households, and our aim is to bring neighbours and organisations together to cultivate a kinder community environment.</p> <p><u><i>Steps Nextdoor takes to foster a positive on-platform experience</i></u></p> <p>Nextdoor verifies with a reasonably high degree of confidence that each individual signing up on Nextdoor is a real person with a tie to the real neighbourhood in which they are registering. More specifically, Nextdoor verifies individuals and businesses based on a number of signals, including device location and third-party data</p> |

| Question | Your response  |
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|          | <p>vendors. If Nextdoor cannot verify an individual or business through these methods, additional verification steps are taken. An individual may be verified using a postcard (mailed by Nextdoor to the individual's address, which includes a code for the user to input). Alternatively, individuals may remain unverified (hereafter, "unverified users"), with limited functionality.</p> <p>Nextdoor's Member Agreement prohibits people from using the Services if they are a registered sex offender in any jurisdiction.</p> <p>Nextdoor users must use their real name on Nextdoor; meaning, the first name they use when introducing themselves to neighbours, friends and colleagues, and legal last name. Using an alias, initials, or an abbreviated version of their last name is prohibited. However, via privacy settings, users can control how their name appears to others, as well as other ways they may appear on Nextdoor in posts, search, or messages.</p> <p>By default, neighbours' news feeds include posts from their neighbourhood and nearby neighbourhoods. This disincentivises posts that are intended to get clicks and go viral and instead incentivises users to keep their posts focused on ways to get and give local help and share relevant information.</p> <p>Nextdoor also provides users with the option to view their feeds in reverse chronological order (sorted by recent activity or posts) rather than curated by feed-ranking technology.</p> <p>Nextdoor is committed to developing leading-edge product technology that facilitates constructive neighbourhood connections and conversations, and a safe experience for users online. Our active in-product features include:</p> <ul style="list-style-type: none"><li>● Kind Neighbor Pledge: Upon joining Nextdoor, all users are asked to agree to our Kind Neighbor Pledge, which is a commitment to be helpful, treat everyone in the Nextdoor community with respect, and to do no harm. It's an opportunity to establish norms and expectations for our platform, and encourage prosocial behaviour.</li></ul> |

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|          | <ul style="list-style-type: none"> <li>● Kindness Reminder: The Kindness Reminder appears when a user drafts and attempts to publish a post that may violate Nextdoor’s Community Guidelines. The tool automatically detects potentially offensive language that may violate Nextdoor’s Community Guidelines and encourages the author to edit their content before they publish. It was the first of our core product features to introduce moments of friction aimed at slowing people down and combating incivility. While the Kindness Reminder, is just a reminder and not a preemptive prohibition on posting offensive content, in 2023, users who received the reminder edited or withheld their post 36% of the time.</li> <li>● Kindness Tips: Nextdoor Kindness Tips serve as a supportive tool to remind neighbours who have had content previously removed about best practices for fostering constructive conversations. These tips offer five specific, actionable pieces of advice with illustrative examples. Importantly, instead of just taking corrective action on repeat violators, Kindness Tips aims to keep neighbours on the platform by proactively guiding neighbours to reflect on how to engage in open and respectful discussions while aligning with our Community Guidelines.</li> </ul> <p>Nextdoor sets clear Community Guidelines that are designed to keep interactions on the platform safe and productive. These guidelines help promote thoughtful conversations and explicitly forbid racism, discrimination, misinformation, and other types of harmful content.</p> <p>There are three main categories of guideline-violating content:</p> <ul style="list-style-type: none"> <li>● Harmful: Content that is illegal, fraudulent, or unsafe, e.g., violent, graphic, discriminatory.</li> <li>● Hurtful: Content that neighbours consider uncivil, e.g., insults, rudeness, name-calling.</li> <li>● Other: Non-local content, spam, content posted in error.</li> </ul> |

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|          | <p>Efforts to address guideline-violating content include:</p> <ul style="list-style-type: none"><li>● Tools to automatically detect and report harmful content.</li><li>● Product features that enable users to report guideline-violating content.</li><li>● Volunteer community moderators who monitor community discussions and help keep dialogue on the platform civil.</li><li>● Our internal Neighborhood Operations Team of trained specialists who review content and accounts that have been flagged and take appropriate action to support the neighbours involved.</li></ul> <p>We work regularly with leading experts including our Neighborhood Vitality Advisory Board to refine our Community Guidelines, iterate on our features and tools, and develop strategic research teams that further our work to create and maintain a welcoming platform.</p> <p>Our annual transparency report discusses metrics around reported content from the year prior. In our recent report, published in February 2024, we disclose that in 2023:</p> <ul style="list-style-type: none"><li>● The subset of content reported for being harmful was 0.29% of total user-generated content on Nextdoor.</li><li>● Nextdoor made only six cybertip reports of suspected child sexual abuse material to National Center for Missing and Exploited Children.</li><li>● In 2023, Nextdoor’s nearly 200,000 volunteer community moderators reviewed 90% of all reported content (1.97% of all pieces of content), and removed 55% of reported content in a median time of 5.3 hours. The remaining reported content was reviewed by paid Nextdoor Operations staff or automatically removed.</li></ul> <p><u><i>Teenagers on Nextdoor</i></u></p> <p>Nextdoor’s Member Agreement requires minors to be 13 years old or older to join Nextdoor.</p> |

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|          | <p>Nextdoor estimates that over 99% of its global users are legal adults. Further, less than 10% are under 25 years of age. In contrast, Nextdoor estimates that more than 40% of Nextdoor users are 55 and over.</p> <p>The overarching utility offered by Nextdoor does not, by nature, appeal to minors. Nextdoor lacks games, cartoonish elements, child-oriented music or activities, child celebrities or celebrities who appeal to children, and is not advertised to children. It is used overwhelmingly by legal adults who are looking to connect with other nearby residents.</p> <p>Nevertheless, Nextdoor has observed teenagers engage on Nextdoor to seek or offer after-school or summer jobs. For example, teenagers on Nextdoor have sought dog-walking or cat sitting, selling crafts, gardening, snow shovelling, tutoring, babysitting, and offering technical computer assistance to neighbours, including a class on how to use the latest generative Artificial Intelligence technology. In fact, a recent review conducted in February 2024 revealed that 3 of the top 4 searches by verified U.S. users aged 13 to 17 involved babysitting.</p> <p><u>Challenges with collecting age</u></p> <p>Nextdoor has tested asking users for date of birth on a voluntary basis, and observes that seeking the age of users in various ways is a barrier to platform access.</p> <p>In the United States, over the three month period from February through April 2024, Nextdoor asked users to voluntarily provide their date of birth and found that only approximately 40% of users who were asked were willing to share their date of birth. Nextdoor expects that, if additional steps to verify a user's date of birth were required, a significantly lower percentage of users would be willing to provide this information.</p> <p>In fact, Nextdoor has received negative feedback from users regarding date of birth collection.</p> <p>Regarding date of birth collection in general, one user said: "You do not need my birthday and I will not give it to you. Suffice it to say that when it comes to my age, all you need to know is that I am a Vietnam veteran."</p> |

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|          | <p>Users who have been asked to share documentation to support their age have also shared concerns about providing personal information to Nextdoor:</p> <p>“After having a Nextdoor account for a decade, I accidentally hit the wrong year and was told I couldn’t have access anymore because I was under 13. I have provided plenty of information to indicate otherwise and was told the ONLY way to regain access was to submit my ID, which is unreasonable since you don’t require one to set up a new account. Customer service sent me on a loop with AI bots with repetitive policy explanations. Did not solve the problem. Since I can’t access my account, I wish for it to be deleted.”</p> <p>“Are you kidding me? You think I’m gonna send you my licence or any personal ID”</p> <p>“App rep wants my personal info to turn my account back on after using the app for over 5 years. I think this is a scam now....”</p> <p>“What?? I am over 60. There must be another way I do not have to give my actual pii info to be hacked.” -“I’m 60 years old and I am not sending a copy of my driver's licence to anyone.”</p> <p>“I’m 57 years old and they’re asking me for my government issued ID. This is totally insane.. I put my age down to zero because I thought it was a scam. Next-door now thinks my age is zero, so they won’t reinstate my Account. Because of fraud there’s no reason that anyone in Nextdoor needs my Social Security number or my drivers licence number. They didn’t have school IDs when I went to school so unfortunately I don’t have one. Graduated 1983.”</p> <p>If date of birth collection and verification were required from prospective users, then Nextdoor would expect a significant number of prospective users to decline to join the platform. If date of birth collection and verification were required from current users, we would expect a significant number of users to be unable or unwilling to provide it in order to continue on the platform.</p> <p>Further, if verification of date of birth using government identification were required, we would expect even higher numbers of prospective and current users to</p> |

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|          | <p>decline to join the platform or be unable or unwilling to provide government identification, for a number of reasons.</p> <p>First, privacy- and security-conscious individuals are likely to consider government ID to be a more sensitive piece of information than simply date of birth. Nextdoor has already seen users leave the platform when they are asked to provide their date of birth or to provide government ID.</p> <p>Second, it is far more cumbersome to provide a photo of a government ID than to enter in a date of birth. Most people know their own birth dates from memory, but not everyone has the means to easily scan and send a photo of a government ID. If an individual has to seek outside assistance to verify, an individual may find verification too much work to continue.</p> <p>If verification by a third party were required, then the number of prospective and current users willing and able to verify date of birth to join Nextdoor could further be reduced. Prospective users who are unfamiliar with Nextdoor and have yet to experience its value proposition may be unwilling to submit identity verification documentation just to try out the platform. Further, prospective and current users who trust Nextdoor with their information may be unwilling to trust an unfamiliar third party. Submission to a third party system is an added layer of integration, which could lead to additional user frustration. If there were an error or other problem, Nextdoor Support agents may not have the information to help the user resolve the issue. This could hurt Nextdoor's image and relationship with its users.</p> <p><u><i>Challenges with identity-document-based verification experiments and high cost of identity-document-based verification</i></u></p> <p>Nextdoor has thus far developed an effective verification system that balances trust with friction and cost of onboarding new users. To the extent that identity-document-based age verification is required by the government, the requirements would cause users to face a significant barrier to accessing the platform, and</p> |



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|          | <p>Nextdoor would suffer irreparable harm due to those users forsaking the service.</p> <p>While Nextdoor has not attempted to require identity-document-based age verification, Nextdoor does use identity-document-based verification in one circumstance and has experimented with third-party document verification. Both circumstances place a significant burden on Nextdoor and its users, indicating the severe challenges that would result if all users were required to provide this information just to access Nextdoor.</p> <p>First, Nextdoor, per its Community Guidelines, requires users to use their real name and address on the platform. On occasion, users have been reported for using either a different name than their real name, or as not residing in the Neighborhood to which they belong on platform.</p> <p>When a user is reported for one of these reasons, the user is suspended and may be required to submit to Nextdoor identity documentation showing their real name/address. Nextdoor Support agents review the user's identity documentation and, if needed, help the user update their name/address before unsuspending the user.</p> <p>Second, Nextdoor attempted third-party verification of documents in 2020 without success. In 2020, Nextdoor attempted an experiment in Europe by which it offered individual verification through a third party using a utility bill. For individuals unable to verify by phone, Nextdoor gave the individual the option of submitting a utility bill to be matched by a third party vendor. Unfortunately, less than 1% of individuals verified using this method, and Nextdoor discontinued the experiment.</p> <p>Based on Nextdoor's experiences with date of birth collection, identity-document-based verification, and third party verification, Nextdoor expects the percentage of users able and willing to complete age verification services to be dismally low, so low that the UK may be an unviable market for two reasons.</p> |

| Question  | Your response   |
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|   | <p>One, the increased costs would dwarf possible revenue on a per-user basis, making the UK market as a whole cost-prohibitive.</p> <p>Two, Nextdoor thrives on local neighbours interacting on the platform, posting information such as local events, sharing recommendations for the best plumber, or helping each other find an escaped pet or lost keys. If a large percentage of locals do not join the platform because of the difficulties imposed by third party verification, the synergy that powers this positive ecosystem is lost, depleting the usefulness and attraction of the platform for all users.</p> |
| <p><b>Volume 3: The causes and impacts of online harm to children</b></p> <p><b>Draft Children’s Register of Risk (Section 7)</b></p>   |   |
| <p><b>Proposed approach:</b></p> <p>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.</p> <p>a. Do you think we have missed anything important in our analysis?</p> <p>5. Do you have any views about our interpretation of the links between 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>Confidential? – Y / N</p>  |

| Question   | Your response |
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| <p><b>Evidence gathering for future work:</b></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 definition of NDC under the Act at this stage? Please provide evidence to support your answer.</p> |               |
| <p><b>Draft Guidance on Content Harmful to Children (Section 8)</b></p>  |               |

| Question  | Your response                |
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| <p>12. Do you agree with our proposed approach, including the level of specificity of examples given and the proposal to include contextual information for services to consider?</p> <p>13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?</p> <p>14. For each of the harms discussed, are there additional categories of content that Ofcom</p> <p>a) should consider to be harmful or</p> <p>b) consider not to be harmful or</p> <p>c) where our current proposals should be reconsidered?</p>  | <p>Confidential? – Y / N</p> |
| <p><b>Volume 4: How should services assess the risk of online harms?</b></p> <p><b>Governance and Accountability (Section 11)</b></p>   |                              |
| <p>15. Do you agree with the proposed governance measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p> <p>16. Do you agree with our assumption that the proposed governance measures for Children's Safety Codes could be implemented through the same process as the equivalent draft Illegal Content Codes?</p> | <p>Confidential? – Y / N</p> |

| Question   | Your response                |
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| <b>Children’s Risk Assessment Guidance and Children’s Risk Profiles’ (Section 12)</b>  |                              |
| <p>17. What do you think about our proposals in relation to the Children’s Risk Assessment Guidance?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>18. What do you think about our proposals in relation to the Children’s Risk Profiles for Content Harmful to Children?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>Specifically, we welcome evidence from regulated services on the following:</p> <p>19. Do you think the four-step risk assessment process and the Children’s Risk Profiles are useful models to help services understand the risks that their services pose to children and comply with their child risk assessment obligations under the Act?</p> <p>20. Are there any specific aspects of the children’s risk assessment duties that you consider need additional guidance beyond what we have proposed in our draft?</p> <p>21. Are the Children’s Risk Profiles sufficiently clear and do you think the information provided on risk factors will help you understand the risks on your service?</p> <p>a) If you have comments or input related to the links between different kinds of content harmful to children and risk factors, please refer to</p> | <p>Confidential? – Y / N</p> |

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| <p>Volume 3: Causes and Impacts of Harms to Children Online which includes the draft Children’s Register of Risks.</p>   |                              |
| <p><b>Volume 5 – What should services do to mitigate the risk of online harms</b><br/> <b>Our proposals for the Children’s Safety Codes (Section 13)</b></p>   |                              |
| <p><b>Proposed measures</b></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><b>Evidence gathering for future work.</b></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? – Y / N</p> |

**Developing the Children’s Safety Codes: Our framework (Section 14)**

25. Do you agree with our approach to developing the proposed measures for the

Children’s Safety Codes?

a) If not, please explain why.

26. Do you agree with our approach and proposed changes to the draft Illegal Content Codes to further protect children and accommodate for potential synergies in how systems and processes manage both content harmful to children and illegal content?

a) Please explain your views.

27. Do you agree that most measures should apply to services that are either large services or smaller services that present a medium or high level of risk to children?

28. Do you agree with our definition of ‘large’ and with how we apply this in our recommendations?

29. Do you agree with our definition of ‘multi-risk’ and with how we apply this in our recommendations?

30. Do you agree with the proposed measures that we recommend for all services, even those that are small and low-risk?

Confidential? – Y / N

**Age assurance measures (Section 15)**

31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures AA1-6? Please provide any information or evidence to support your views.

a) Are there any cases in which HEAA may not be appropriate and proportionate?

b) In this case, are there alternative approaches to age assurance which would be better suited?

32. Do you agree with the scope of the services captured by AA1-6?

33. Do you have any information or evidence on different ways that services could use highly effective age assurance to meet the outcome that children are prevented from encountering identified PPC, or protected from encountering identified PC under Measures AA3 and AA4, respectively?

34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services?

a) Please provide any supporting information or evidence in support of your views.

35. Do you have any information or evidence on other ways that services could consider different age groups when using age assurance to protect children in age groups judged to be at risk of harm from encountering PC?

Confidential? – Y / N

**Content moderation U2U (Section 16)**



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| <p>36. Do you agree with our proposals?<br/>Please provide the underlying arguments and evidence that support your views.</p> <p>37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes?</p> <p>a) Please provide any arguments and supporting evidence.</p>   | <p>Confidential? – Y / N</p> |
| <p><b>Search moderation (Section 17)</b></p>   |                              |
| <p>38. Do you agree with our proposals?<br/>Please provide the underlying arguments and evidence that support your views.</p> <p>39. Are there additional steps that services take to protect children from the harms set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>40. Regarding Measure SM2, do you agree that it is proportionate to preclude users believed to be a child from turning the safe search settings off?</p> <p>The use of Generative AI (GenAI), see Introduction to Volume 5, to facilitate search is an emerging development, which may include where search services have integrated GenAI into their functionalities, as well as where standalone GenAI services perform search functions. There is currently limited evidence on how the use of GenAI in search services may affect the implementation of the safety measures as set out in this code. We welcome further evidence from stakeholders on the following questions and please provide</p> | <p>Confidential? – Y / N</p> |

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| <p>arguments and evidence to support your views:</p> <p>41. Do you consider that it is technically feasible to apply the proposed code measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions?</p> <p>42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions?</p> |  |
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| <b>User reporting and complaints (Section 18)</b>   |                              |
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| <p>43. Do you agree with the proposed user reporting measures to be included in the draft Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p> <p>44. Do you agree with our proposals to apply each of Measures UR2 (e) and UR3 (b) to all services likely to be accessed by children for all types of complaints?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please</p> | <p>Confidential? – Y / N</p> |

signpost to the relevant parts of your prior response.

45. Do you agree with the inclusion of the proposed changes to Measures UR2 and UR3 in the Illegal Content Codes (Measures 5B and 5C)?

a) Please provide any arguments and supporting evidence.

**Terms of service and publicly available statements (Section 19)**

46. Do you agree with the proposed Terms of Service / Publicly Available Statements measures to be included in the Children's Safety Codes?

a) Please confirm which proposed measures your views relate to and provide any arguments and supporting evidence.

b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.

47. Can you identify any further characteristics that may improve the clarity and accessibility of terms and statements for children?

48. Do you agree with the proposed addition of Measure 6AA to the Illegal Content Codes?

a) Please provide any arguments and supporting evidence.

Confidential? – Y / N

**Recommender systems (Section 20)**

49. Do you agree with the proposed recommender systems measures to be included in the Children's Safety Codes?

a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost

Confidential? – Y / N

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| <p>to the relevant parts of your prior response.</p> <p>50. Are there any intervention points in the design of recommender systems that we have not considered here that could effectively prevent children from being recommended primary priority content and protect children from encountering priority and non-designated content?</p> <p>51. Is there any evidence that suggests recommender systems are a risk factor associated with bullying? If so, please provide this in response to Measures RS2 and RS3 proposed in this chapter.</p> <p>52. We plan to include in our RS2 and RS3, that services limit the prominence of content that we are proposing to be classified as non-designated content (NDC), namely depressive content and body image content. This is subject to our consultation on the classification of these content categories as NDC. Do you agree with this proposal? Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.</p> <ul style="list-style-type: none"> <li>• Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.</li> </ul> |                              |
| <b>User support (Section 21)</b>   |                              |
| <p>53. Do you agree with the proposed user support measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and</p>  | <p>Confidential? – Y / N</p> |

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| <p>provide any arguments and supporting evidence.</p> <p>b) If you responded to our Illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.</p>  |                              |
| <p><b>Search features, functionalities and user support (Section 22)</b></p>  |                              |
| <p>54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views.</p> <p>55. Do you have additional evidence relating to children’s use of search services and the impact of search functionalities on children’s behaviour?</p> <p>56. Are there additional steps that you take to protect children from harms as set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>As referenced in the Overview of Codes, Section 13 and Section 17, the use of GenAI to facilitate search is an emerging development and there is currently limited evidence on how the use of GenAI in search services may affect the implementation of the safety measures as set out in this section. We welcome further evidence from stakeholders on the following questions and please provide arguments and evidence to support your views:</p> <p>57. Do you consider that it is technically feasible to apply the proposed codes measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions? Please provide</p> | <p>Confidential? – Y / N</p> |

arguments and evidence to support  
your views.

**Combined Impact Assessment (Section 23)**

58. Do you agree that our package of proposed measures is proportionate, taking into account the impact on children's safety online as well as the implications on different kinds of services?

Confidential? – Y / N

**Statutory tests (Section 24)**

59. Do you agree that our proposals, in particular our proposed recommendations for the draft Children's Safety Codes, are appropriate in the light of the matters to which we must have regard?

a) If not, please explain why.

Confidential? – Y / N

**Annexes**

**Impact Assessments (Annex A14)**

60. In relation to our equality impact assessment, do you agree that some of our proposals would have a positive impact on certain groups?

61. In relation to our Welsh language assessment, do you agree that our proposals are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English?

a) 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

Confidential? – Y / N



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| use Welsh and treating Welsh no less favourably than English. |  |
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Please complete this form in full and return to [protectingchildren@ofcom.org.uk](mailto:protectingchildren@ofcom.org.uk).