

Dear OFCOM, thank you for running this consultation and the clear and extensive efforts you have made to develop the Children's Safety Code. Please treat this e-mail as my consultation response rather than a response via your online form.

Whilst the array of measures, terms, gateways, thresholds and triggers you have developed is impressive, they are all evidence of an arms race that you cannot and will not win. In a free market and increasingly AI-driven tech world, regulation will never keep up with exploitation because it never has kept up with tech advances; and these are accelerating. We already have a dark web and 'online influencers' are a way of life for too many young people. Also, there are so many legitimate ways around OFCOM's proposed firewalls already that you won't stop the abuse or the ideologists from breaking through. To understand what I mean, listen to this talk by Catherine Price (author of "How to Break up with your Phone"): [Kids, Smartphones and Social Media: The Risks and The Solutions \(youtube.com\)](#). Also, the Code is very detailed, complex and complicated and will inevitably lead to legal challenges and court cases, i.e., it will attract its own cottage industry of opinion, counter-opinion, evidence and counter-evidence, and intellectual hand-wringing. This will not do and it will not serve children.

The solution is for OFCOM to join the call to ban the availability, i.e., ownership and use of all smart phones and related devices, and unsupervised PC usage, for all children under the age of 17, with no exceptions or caveats for self-selecting individuals, groups or ideologies. OFCOM must make this recommendation to Government.

We already ban other attractants to children that are equally as harmful as smart phones and other such items, though less pervasive and insidious. These bans include alcohol, cigarettes, underage sex, and driving a motor vehicle on the public highway. OFCOM's proposed Code would be the equivalent of developing regulated solutions that permit children to continue to drink alcohol, smoke cigarettes, participate in underage sex and drive on the public highway. You can see how daft that is and how that would continue to expose children to harm; which is why those outright bans are in place. So, you must recommend the same for smart phones and other such items, not just their content but the items themselves because these too are items of desire, social status and social exclusion. The items and their content are addictive; they're designed to be.

Not banning them will continue to permit the danger to enter a child's classroom, home and bedroom, where neither the school gate, the teacher, the parent or the front door are sufficient to keep children safe anymore. By not banning them, you continue to do the tech manufacturers' and social media giants' jobs for them, ensuring these devices and content continue to reach children. Teachers and parents have been emasculated by these devices and their content and too many

have become inured or lazy in their duty of care as a result. You must help reverse this. BAN THESE DEVICES.

I am happy for my consultation response not to be treated as confidential.

Yours faithfully