Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.
Is this a confidential response? (select as appropriate) No
We are a volunteer organisation born in May 2020 in order to advocate for children's rights and well-being at a time when school closures and lockdown restrictions disproportionately burdened harms onto children and young people. We believe children must be prioritised and their voices, and the voices of those advocating for them should be better represented and protected in policy making. We are concerned about the prolific use of smartphones and social media use amongst children and the increase in screen time which was exacerbated by school closures and appears now to be entirely out of control, with smartphones tolerated and sometimes even encouraged or mandated in school lessons - and at ever earlier ages - with parents feeling powerless and unable or unwilling to act. For children being lonely or socially disengaged in the real word has made and continues to make it more likely they will they may engage in riskier online behaviours including opening themselves up to contact with strangers. There is a significant and growing body of evidence suggesting a causal link between sharply declining kids' wellbeing and smartphone, online and social media use. We have a vested interest in children's rights, welfare, safeguarding and well-being and are deeply concerned that there are such limited and easily bypassed options for parents to protect their children from devices and online content that can cause serious mental and physical harm. We believe as a society we can and must demand better for our children. We believe that any legislation to protect children and young people must include a regulatory framework that places a duty on device manufacturers, suppliers and content providers to prove the safety of their products and services in the hands of children, pending which those products and services must be restricted for children. We believe providing children with the protection they deserve should extend to the devices themselves in particular those that are portable and used in a ubiquitous manner by children, eg. smartphones, as well as the content and can provide more detail on how this could work on request. Please note, as child advocates, our concerns lie first and foremost in the wide-reaching harms children encounter online. Therefore, we have answered questions within this response on how the legislation might work to ensure that children are genuinely protected online but we have not responded to fields regarding the more technical and process driven aspects relevant to online service providers.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Is this a confidential response? (select as appropriate)

No

Popular services that induce Peer Pressure ie. those that children perceive their peers to have / to be attractive / cool

Child targeted marketing and advertising including use of Child Influencers,

Child targeted content eg. Content produced by peers or that may be relevant to a child's local area, or content that is appealing to children as may be seen by children as a solution to a problem or insecurity, or because it is seen by children as cool and interesting or piqued their excitement or was attached to high social status.

Question 3: What information do services have about the age of users on different platforms (including children)?

Is this a confidential response? (select as appropriate)

No

Information on the age of children provided to services is regularly inaccurate. Children are able to access social media platforms and other harmful online platforms by simply inputting a unverified date of birth. There is currently no legislative requirement on services to confirm this date of birth as accurate. Inputting an incorrect date of birth which indicates them to be older than they are is widely practiced by children in order to gain access to platforms that carry unsuitable content, including but not limited to Tik Tok, Instagram, YouTube, Snapchat & Facebook. Some examples are detailed below.

Platform	Minimum age	Self-verification of age?	Notes
Instagram	13	Y	In some jurisdictions their age limit is higher.
SnapChat	13	Y	
TikTok	13	Y	Able to accept government issued ID for other purposes - https://www.alphr.com/change-your-age-tiktok/ In the US TikTok has an 'under 13' version with cleaner content - https://www.commonsensemedia.org/articles/parents-ultimate-guide-to-tiktok#kids%20under%2013
Facebook	13	Y	https://about.fb.com/news/2021/07/age-verification/

Twitter	13	Y	
YouTube	13	?	Minimum age application is flaky for users. For channel creators, ages 13-17 can only create 'with parental permissions, with under 13s only able to create and share content from a channel set up by a parent. NB: YouTube 'Shorts' similar to TikTok.
Discord	13	Y	
BeReal	13	Y	Set up to combat negative and unrealistic social media. https://www.internetmatters.org/hub/news-blogs/what-is-bereal-app/

Question 4: How can services ensure that children cannot access a service, or a part of it?

Is this a confidential response? (select as appropriate)

No

Currently all of the social media platforms permit self-verification of age through entry of a date of birth (DOB). There are limited checks on the accuracy of the supplied DOB. These generally seem only to occur on receipt of a report of underage usage at which point most platforms appear to have the functionality to process age verification checks. To truly apply age minimums to social media platforms there must be verification of the supplied DOB or age, ideally independently conducted.

In order to verify DOB, the following would be required:

- Formally-issued documentation (physical or digital) which includes DOB as a data point
- A mechanism to review documentation against entered DOB
- A facility within the social media platform data warehouse to store confirmed DOB and proof method (even if a copy of the ID is not retained) for potential external sharing and checks
- Each account would also probably need to be associated with a legal name rather than an identity which can be entirely fictional at present.

Option A – Centralised verification service
Under this approach, there would be a centralised verification service run by an independent organisation which the social media platforms would effectively call upon or direct their users towards. This is the more efficient model, as verification could be run once for each individual and stored for usage by multiple platforms who call on the data. Positives are that this options would be:

- Independent from platforms, providing greater assurance that checks are robust
- There appear to already be commercial suppliers set up to provide this or a similar service
- Would ensure consistent application of the age restrictions themselves and the process of verification
- Likely faster processing of initial age verification checks and any appeals etc (as core of business)
- With alignment of business interests (i.e. funding received)

Question 4: How can services ensure that children cannot access a service, or a part of it?

Downsides are;

- Would require development of a funding model which might be complex or time-consuming to develop, particularly if government wanted to consult with industry, meantime children remain at risk. Options: levy, fee per verification check, licence fee. (NB: a levy has been successfully applied to the UK pension industry and players of all sizes within that industry contribute to fund pension-related central services with size of levies determined by size of customer base.)
- Up-scaling resources to deal with initial demand and then reducing these again to a baseline level might be challenging (resources can't just be borrowed from elsewhere in the organisation if the business is standalone).
- f there is not already a commercial organisation which could scale to provide this service, there might need to be some initial funding either provided of facilitated by the government in order to stand up this service.

Option B – In-house verification

As most social media platforms already have some level of IDV / age verification capabilities, the simplest implementation option would probably be to ask the platforms to extend their existing service. This option is likely to be quicker to implement as an extension of existing capabilities that already exist and are integrated into existing processes There are however downsides that come with this approach including but not limited to;

- Less oversight of and therefore reassurance that the controls are being applied correctly
- Data wouldn't be shareable across platforms making it more likely that platforms reach different conclusions about the same individual's status.
- Given the misalignment of commercial drivers with child safety, with this approach there is more likely to be underinvestment in continuing to ensure that checks are robust resulting in users, over time, developing and sharing ways to circumvent or falsely pass checks.

Option C – Regulation of the devices and content themselves under a legislative framework

This is the simplest solution and offers the broadest protection for children placing obligations on device manufactures, suppliers and content providers. This solution would require portable devices such as smartphones to be subject to a tobacco-style regulatory framework for that places a duty on manufacturers, suppliers and content providers to prove the safety of their products and services in the hands of children, pending which those products and services must be restricted for. Under this option manufacturers, suppliers and content providers would be obliged to demonstrate safety of software and devices in the hands of children, and of any content intended for use by or directed at children, in each case via a formal Children's Commissioner-sponsored harm assessment, before which sale and supply of smartphones and content to minors to be prohibited. The onus would be on the supplier to verify age which would mean that the sale of smartphones would be limited to those over 18.

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

Is this a confidential response? (select as appropriate)

No

Whilst we are not technology experts it is clear that to protect children from harmful online content there are a number of questions that would be beneficial to consider which include but are not limited to ;

- Age verification would likely need to be applied retrospectively to all existing social media accounts, making this a significant exercise with knock-on implications for resourcing. To apply this only to new accounts would allow a number of underage users to continue to use platforms. Alternatively, there could be a threshold for currently entered DOB or age over which no checks would be completed retrospectively (at say, age 30) – working on the (unverified) assumption that children are less likely to enter a DOB which makes them decades older. One for consideration.
- The definition of a social media platform needs to be wide enough to capture all platforms (e.g. should it include YouTube, despite the majority of users being 'watchers' rather than also 'posters'?). Would there be any exemptions from raised age restrictions positively focused platforms (e.g. BeReal) and how would these be defined?
- The legal definition of a child is under 18 and as children grow and develop in maturity they require protecting in differing ways. This needs to be considered.
- What should platforms do with currently underage users, once these are discovered to be so? Remove them entirely? Allow their accounts to be frozen until the point at which they reach the minimum age?
- If a centralised verification service is implemented how will the funding model work? Options include levy system, fee per verification check and licence fee. The different funding models would drive different behaviours (fee per check would likely drive down checks for example) which should be explored in more detail.
- At present, users can set up social media accounts using entirely fictional identities and, on some platforms (e.g. Instagram), they can hold multiple accounts simply by having multiple email addresses. In order for age verification to be able to work it seems likely that users would need to use their actual identities to set up accounts otherwise verification becomes a nonsense. For some users, including many adults, the anonymity of social media is part of the appeal and insisting on the use of their real identity would represent a significant cultural shift which might take some convincing.

Risks

	Risk description	**Mitigation**	**Contingency**
1	Platforms will argue that it's too costly, difficult or time consuming to implement this and do it properly	• Take the responsibility away from the platforms and impose this on through a centralised service	

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?			
2	Users will find a way to falsely verify their age	• Use of a centralised service would likely reduce this	• Continually monitor stats that might indicate this. • Close down loopholes once identified
3	Platforms might set up more age appropriate spin-off platforms so that they don't lose access to this audience. Over time this might become less safe. (Note: Instagram are reportedly developing a 'tween' system.)	• Apply age verification to younger platforms too – to ensure that ages are appropriate	• Create a 'social media governance' body within UK government which: 1. monitors social media platforms' activity 2. sets and reviews age limits by taking into consideration the appropriateness of the activities and content permitted within platform, and 3. continues to scan for potential increasing risks, implementing changes to policy or requirements to cover off these risks
4	Platforms might argue that they need significant development time, delaying implementation for many months or even years	• Push for implementation of a centralised service • Define an implementation deadline with serious financial, or other, implications	
5	Over time, the independent organisation which facilitates checks becomes more closely aligned with the social media platforms, particularly given that their funding will likely become their biggest revenue stream. We have seen this with regulators in the pharmaceutical industry, so is a real risk, particularly with some of the funding model options.	• Create a 'social media governance' body (as above) into which the centralised check service would need to effectively report into. • It might help if funding was passed through the governance body or another third party to maintain a higher degree of separation.	
6	Platforms put barriers in the way of making this work, e.g. resisting the use of real	• Give the 'social media governance' body real powers and teeth to create obligation	

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

	identities for setting up of accounts		

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Is this a confidential response? (select as appropriate)

No

The fact that being online doesn't feel optional to children and very few children do not spend time online is evidenced by Ofcom's own reporting that 99% of children went online in 2021 and 9 in 10 owned their own mobile phone by the age of 11. Children have been forced to rely on online spaces for activities across all areas of their lives. These areas included friendship, connection, education and engaging with culture. Children can easily access harmful online content whether they stumble inadvertently across it, whether it is shared with them or whether they seek it out.

Factors shaping the routes to harm are detailed but not limited to:

1. Isolated exposure to content that caused immediate, but often quite transient and minimal, harm e.g., stumbling across or being sent a violent or sexual video in a social media feed
   2. Cumulative passive exposure to content over time that can build up to cause more significant harm e.g., being immersed in body-focused content in social media feeds
   3. Cumulative active engagement with content over time that can self-reinforce behaviour to cause significant and severe harm e.g., engaging with and participating in pro-anorexia communities online

More detail on this is reported in Ofcom's own report https://www.ofcom.org.uk/__data/assets/pdf_file/0021/245163/children-risk-factors-report.pdf

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

There is a significant body of causal evidence of harm to children from accessing harmful content including but not limited to;

ANXIETY & DEPRESSION

Excessive smartphone and social media use among young people has been associated with difficulties in cognitive-emotion regulation, impulsivity, impaired cognitive function, addiction to social networking, shyness, depression, loneliness, stress, social anxiety and low self-esteem.

Rates of teen depression and suicide have skyrocketed in the past decade such that we are now experiencing a global teen mental health crisis. Meanwhile mental health researchers in the US have observed that symptoms of depression, suicide risk factors and suicide rates among teens increased sharply in 2012, coinciding with the acceleration of smartphone ownership particularly among those younger generations. Jonathan Haidt, a leading expert in the field writes, "There is now a great deal of evidence that social media is a substantial cause, not just a tiny correlate, of depression and anxiety, and therefore of behaviors related to depression and anxiety, including self-harm and suicide."

SOCIAL ISOLATION AND LONELINESS

The almost ubiquitous presence of online devices and access in social, family, leisure, retail and business settings is changing the way children understand the social world, and their confidence and ability to interact in person with friends, family and community, with potentially severe impacts on long-term personal and professional life prospects still to be measured. A study of 1,500 parents of children aged six to 16 found that 70% are desperate to get their youngsters outside more, while 63% find it hard to get their child off their devices and into the great outdoors. Around 12% of boys in the UK were believed to be addicted to playing video games in 2020. Smartphones are by design single-user devices, and so encourage solo activity at the expense of social interaction. Despite the omnipresence of social media and instant messaging, children are feeling lonelier than ever, with a third of teens now reporting loneliness at school, up from a tenth in the year 2000.

IMPAIRED ACADEMIC ATTAINMENT

Research suggests that smartphone/social media use during studying has a negative impact on learning and academic achievement, and the greater the use the greater the impact . Researchers from the London School of Economics discovered that the performance of pupils at schools which had banned smartphone use experienced the equivalent of an extra week of education over an academic year. A number of countries, including France, have already banned phones in schools.

IMPAIRED BRAIN DEVELOPMENT

A recent study by the National Institute of Health revealed that children who spend more than two hours a day on screen-based activities score lower on language and thinking tests. And kids who spend more than seven hours a day on screens exhibit a thinning of the brain's cortex, the brain area responsible for critical thinking and reasoning. Brain scans have linked internet-addicted teens with shrunken grey matter, which controls critical processes such as planning, empathy, and impulse control.

RISKS FROM RADIO WAVE EXPOSURE

Long periods of mobile phone use in children conflicts expressly with Government guidance on reducing radio wave exposure from mobile phones. The most recent Government guidance dated February 2020 states that "uncertainties in the science suggest some additional level of precaution is warranted, particularly for sources such as mobile phones where simple measures can be taken to reduce exposure", and recommends that "excessive use of mobile phones by children should be discouraged".

DISRUPTION TO SLEEP PATTERNS

Significant links have been established between the use of smartphones and tablets, and disrupted sleep among children. Research data from over 125,000 children found that use of media devices causes sleep problems, including insufficient sleep time, reduced quality of sleep and daytime fatigue. It appears that the mere anticipation of smartphone use is problematic too: sleep problems are found to be more likely if children have access to media devices at bedtime even if they are not used at that time.

OBESITY

Elevated screen media exposure is associated with increased eating while viewing; and when combined with repetitive online exposure to targetted high-calorie, low-nutrient food and beverage marketing, disrupted sleep and related sedentry behaviours, screens have become a significant contributing factor in the obesity epidemic. Studies have equally found that reducing screen-related sedentary behaviour is essential in preventing and treating childhood obesity.

EYE DAMAGE

Continual close eye work and a lack of outdoor play contribute to digital eye strain and what optometrists now regard as a myopia epidemic: widespread short-sightedness. The prevalence of myopia increased materially in 2020 compared with the previous 5 years. A study of 120,000 primary aged children in China published in 2021, suggested a threefold increase in the prevalence of short-sightedness in 2020.

NORMALISATION OF ADDICTIVE BEHAVIOURS

Parents' own online use can have potentially very serious consequences for the development of babies and toddlers, and can normalise dependencies and addictive behaviours. Adults on average pick up their phones as many as 150 times per day, creating short interruptions in real-world relationships, and reinforcing perceptions about the acceptance of dependency and other addictive behaviours.

Studies already show that maternal smartphone use compromises mother–child interaction, which unsurprisingly can have negative effects on child development including language, cognition, and socio-emotional regulation. For older children, spending time with family members who are constantly checking, scrolling, texting, or engaged with a smartphone can cause feelings of inadequacy and isolation as well as creating negative expectations about the ubiquity of smartphones in the human experience.

SELF-HARM AND SUICIDE

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Incidences of self-harm are rising among young people, particularly in teenage girls, and that rise has previously been linked to increasing use of social media and the internet, where self-harm and suicide content is at present readily accessible. Self-harm is the strongest predictor of suicide, with 40-60% of people who die by suicide having self-harmed in the past.

Teens who spend five or more hours per day on their devices are 71% more likely to exhibit at least one risk factor for suicide, regardless of the content consumed. Whether the content is frivolous or extreme, excessive screen time exposure has been correlated proportionately to depression and risk of suicide among children.

The 2022 inquest into the death of Molly Russell was the first time in the UK that social media was explicitly cited as having been implicated in the suicide of a child.

EXPOSURE TO PORNOGRAPHY AND EXTREME CONTENT

In recent studies, 55% of UK teens reported seeing real life acts of violence on social media in the last 12 months. 24% had seen children carrying, promoting, or using weapons. Children's Commissioner, Rachel De Souza said of a teenage focus group; "I was asking them what they had seen online and two thirds of the room of 15 to 16 year olds had been sent images of a beheading". The UK Government meanwhile estimates that online pornography is accessed by 1.4 million UK children each month. Around 50% of 12 child year olds report having seen pornography online.

Even if a child's phone is protected by parental controls there is no failsafe for ensuring another child doesn't share harmful content with your child, for example in the playground. Images and videos of both sexually explicit behaviors and extreme violence are ubiquitous on the internet, via texting, or through apps, as well as social media.

Meanwhile, young people are frequently exposed to violent pornography, depicting coercive, degrading or pain-inducing sex acts; a Children's Commissioner report finds that frequent users of pornography are more likely to engage in physically aggressive sex acts.

SEXTING

Not only are young children at risk of exposure to explicit content online, they are at risk of creating it as well. One in four teens reports receiving sexual messages and/or explicit photos and videos through their smart devices. It is also well documented that children are at heightened risk to manipulation and grooming by sexual predators when operating online.

PREDATORS

There are an estimated 500,000 online predators active each day. Children between the ages of 12 and 15 are especially susceptible to be groomed or manipulated by adults they meet online. These adults are known as Groomers and they befriend children in order to take advantage of them for sexual abuse and other forms of child abuse. An estimated 89 percent of sexual advances directed at children occur in Internet chatrooms or through instant messaging.The child may be pressured to take explicit photos or videos of themselves and send them to the groomer. In the most extreme cases, the groomer will pressure the child to meet in person. Any child with unsupervised access to the internet is potentially at risk.

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

CYBERBULLYING

According to a 2022 Ofcom report, among children aged 8-17 who have experienced bullying, more than eight in ten experienced it through a phone or laptop, and of those bullied via technology, the most common way was via text or messaging apps (56%). Research has also found that teens who are 'heavy mobile phone users' are more likely to engage in the practice of bullying online, as well as become bullied themselves. Teenagers who are the subject of cyberbullying are more than 4 times as likely to report thoughts of suicide and attempts.

BODY IMAGE ANXIETY

In a recent study in the UK 40% of teenagers said images on social media had caused them to worry about body image, and linked greater use of mobile phones to increased negativity about physical self-esteem.

GAMING

Around 12% of boys in the UK were addicted to playing video games in 2020

Gaming disorder is defined as a pattern of persistent or recurrent gaming behaviour so severe that it takes "precedence over other life interests". The number of children and young adults entering treatment for gaming addictions and disorders tripled over the last year, and experts believe that the pandemic and lockdowns played a key role in the increase.

Gaming replaces healthy behaviours and habits such as physical activity and sleep, and leads to harmful habits such as reduced sleep or day-night reversal. It may lead to the development of gaming disorder and can encourage migration to gambling as some games have gambling-like elements. Although many gaming environments and communities are moderated, some of the communication taking place may be unmonitored. This can place your child at risk of cyberbullying or contact from potentially dangerous strangers.

TICS / TOURETTES

Since the onset of the COVID-19 pandemic clinicians have reported seeing a marked increase in presentations of sudden and new onset of severe tics and 'tic-like 'attacks, including examples of what has been described as social media-induced sociogenic illness.

Neurologists have begun seeing increasing numbers of patients, especially teenage girls, with unusual, involuntary movements and vocalisations reminiscent of Tourette's syndrome. After ruling out other explanations, the tics in these teenagers appear to be correlated with excessive hours of viewing TikTok videos of people who report having Tourette's syndrome and other movement disorders. Posted by social media influencers, these videos have billions of page views on TikTok; and similar videos are available on YouTube and sites commonly used by or targetted at younger people.

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

The social media platform Facebook, now part of Meta, has stated that it "cares deeply" for the safety of people that use its applications and has set out its policy on suicide and self-injury. As part of this it states:
"We regularly consult with experts in suicide and self-injury to help inform our policies and enforcement, and work with organisations around the world to provide assistance to people in distress.While we don't allow people to intentionally or unintentionally celebrate or promote suicide or self-injury, we do allow people to discuss these topics because we want Facebook to be a space where people can share their experiences, raise awareness about these issues and seek support from one another."
Other social media platforms also have content and behaviour policies. For example, Twitter prohibits the promotion or encouragement of suicide and self-harm and has policies against abuse behaviour and harassment.

These are failed risk assessments and policies that are essentially doing nothing to keep children safe online.

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

No

Services should consider the specific vulnerabilities of all children but also those who have more specific risk factors such as but not limited to:

Circumstances and characteristics of children - including the engagement, oversight and media/digital literacy of their parents, a child's pre-existing vulnerabilities such as Special Educational Needs, existing mental health conditions and social isolation, offline challenges such as bullying or peer pressure, and feelings such as low self-esteem or poor body image.

Design features / functionalities of platforms ie those that encourage and enable children to build large networks of people, including those that they do not know offline and those that exposed children to content and connections that they hadn't selected or pro-actively sought.

Safety Features - Few children engage with safety features that may decrease their risk of harm often for fear of restricting their access to functions that they wanted to use or that peers are using and also Some used false dates of birth when setting up their platform profiles to gain access to platforms, therefore placing themselves at risk of seeing age-inappropriate content or contact.

Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?
Is this a confidential response? (select as appropriate) No
N/A

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?
Is this a confidential response? (select as appropriate) No
N/A

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?[1]
Is this a confidential response? (select as appropriate) No

[1] See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?[1]
N/A

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?
Is this a confidential response? (select as appropriate) No
N/A

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?
Is this a confidential response? (select as appropriate) No
N/A

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?
Is this a confidential response? (select as appropriate) No
N/A

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.
Is this a confidential response? (select as appropriate) No
N/A

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?
Is this a confidential response? (select as appropriate) No
N/A

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?
Is this a confidential response? (select as appropriate) No
N/A

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?
Is this a confidential response? (select as appropriate) No
N/A

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?
Is this a confidential response? (select as appropriate) No
N/A

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?
Is this a confidential response? (select as appropriate) No
N/A

Question 22: How are human moderators used to identify and assess content that is harmful to children?
Is this a confidential response? (select as appropriate) No
N/A

Question 23: What training and support is or should be provided to moderators?
Is this a confidential response? (select as appropriate) No
N/A

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?
Is this a confidential response? (select as appropriate) No
N/A

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?
Is this a confidential response? (select as appropriate) No
N/A

Question 26: What other mitigations do services currently have to protect children from harmful content?
Is this a confidential response? (select as appropriate) No
N/A

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?
Is this a confidential response? (select as appropriate) No
N/A

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?
Is this a confidential response? (select as appropriate) No
N/A