

## Your response

Question	Your response
<p><b>Question 1:</b> Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p>Confidential? – N</p> <ol style="list-style-type: none"><li>1. NAHT welcomes the opportunity to comment on Ofcom's proposed Work Plan for 2026/27.</li><li>2. NAHT is the UK's largest professional trade union for school leaders. We represent more than 38,000 head teachers, executive heads, CEOs, deputy and assistant heads, vice principals, school business leaders and middle leaders. Our members work across the early years, primary, special and secondary schools; independent schools; sixth form and FE colleges; outdoor education centres; pupil referral units, social services establishments and other educational settings.</li><li>3. In addition to the representation, advice and training that we provide for existing school leaders, we also support, develop and represent the school leaders of the future. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere.</li><li>4. Our response will focus on the proposals relating to children and young people's safety and experience in the online environment.</li><li>5. NAHT notes that while there are opportunities and positive outcomes associated with the use of online platforms, including AI and social media, there are also significant potential risks</li></ol>

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	<p>which must be effectively guarded against, especially when it comes to children’s wellbeing and development.</p> <ol style="list-style-type: none"> <li data-bbox="746 461 1382 645">6. The risks that children are exposed to in the digital environment are vast and varied, ranging from exposure to inaccurate, harmful, and discriminatory content, to bullying, blackmail, and scams.</li> <li data-bbox="746 730 1382 1070">7. NAHT believes that social media websites and online platforms, including generative AI providers, must take responsibility in providing a safe online environment, including regulating the access children and young people have to harmful online content. The lack of thorough content moderation and safety features has directly paved the way for the promotion of inaccurate, inappropriate and harmful content.</li> <li data-bbox="746 1155 1382 1339">8. NAHT therefore cannot understate the importance of social media and other platforms expanding and improving the monitoring and moderating of content hosted on their sites, to minimise children’s exposure to harm.</li> <li data-bbox="746 1424 1382 1644">9. Part of the approach to ensure that online providers fulfil their duties to protect children and young people from online harm, as outlined by the Online Safety Act, will depend on effective regulation, monitoring, and enforcement from Ofcom.</li> <li data-bbox="746 1729 1382 1948">10. As such, NAHT welcomes the proposals in Ofcom’s proposed Work Plan for 2026/27 to continue working towards providing a safer environment for children, by introducing additional safety measures to strengthen the Illegal Harms and Protection of Children Codes, monitoring</li> </ol>

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	<p>age assurance checks, and more effectively removing illegal content.</p> <p>11. Given the significant potential risk that an unregulated, unmonitored, and therefore unsafe, online environment can pose to children and young people’s safety and wellbeing, NAHT supports Ofcom’s to use enforcement action to protect children from harmful content.</p> <p>12. NAHT acknowledges the progress that has been made in improving the protections and safety measures for children across many online platforms since the introduction of the Online Safety Act. However, it is clear from this Work Plan, the recently released Online Safety in 2025 Ofcom report, and notably NAHT members’ experiences of supporting pupils in their schools, that there is still significant progress to be made.</p> <p>13. There is a clear consensus that social media platforms pose a particular risk to children and young people’s safety and wellbeing. NAHT has therefore welcomed the introduction of Ofcom’s Codes of Practice, applicable to online service providers, including social media platforms.</p> <p>14. In addition, NAHT has also previously welcomed Ofcom’s proposals to introduce recommendations for online providers to improve media literacy. NAHT maintains that these recommendations should be strengthened into further Codes of Practice to ensure uptakes amongst all providers, given the importance of the subject matter.</p> <p>15. NAHT believes that any platform that has children and young people amongst its user base must provide safety features tailored to them, along with clear rules and codes of conduct to ensure that everyone understands the accepted</p>

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	<p>behaviour of users on the site. Ideally, these features would be similar in design and operate consistently across platforms to ensure that children and young people are easily able to identify and use such functions.</p> <p>16. Whilst providers such as TikTok and Meta have announced that they have begun to rollout new safety measures, NAHT would urge Ofcom to scrutinise these over the coming months and years to ensure that they materially improve children’s safety and experiences and align with the Codes of Practice.</p> <p>17. Improved content moderation must also be coupled with strengthened and reliable age verification procedures, to ensure that children are not able to access harmful content during their formative years, when they are still highly vulnerable to the influence of external sources. NAHT welcomes the progress made on age assurance procedures since that element of the Online Safety Act began to be enforced, but is concerned that they can continue to be easily circumvented, such as with the use of VPNs.</p> <p>18. It is also important for Ofcom to consider the additional actions which may be required of social media companies and online providers to protect vulnerable young people, for example, those without strong family or friendship networks such as some looked after children, and those with additional needs who may fit age profiles but whose understanding and skills to navigate online communications and relationships are minimal. For such young people the risks of exposure to harmful and illegal content is even greater and moderation needs to be far more proactive to protect them from harm.</p>

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	<p>19. Moreover, given the pace in which AI technology is developing and being integrated into existing digital systems, NAHT believes that it is imperative that these tools are continuously monitored to assess their impact, with rapid regulation and enforcement through Ofcom, supported by legislative change where appropriate.</p> <p>20. The proliferation of AI tools in the last few years, whether in the form of chatbots or enhancements on online platforms, has heightened and exacerbated the existing risks to children and young people due to the ease of access and the proactive way in which further engagement is prompted on the basis of the platform's algorithms. The Molly Rose Foundation recently highlighted the reach that harmful content that TikTok was algorithmically recommending, with 9% of harmful posts being liked at least one million times.</p> <p>21. AI chatbots, in particular, have seen a significant increase in use over the last 18 months, with 64% of children aged 9-17 using them (Internet Matters Pulse survey, 2025). The survey found that the use of these chatbots is exposing them to explicit and age-inappropriate content, despite the chatbot providers being aware of their users' age and notionally prohibiting this content for child users in their terms of service.</p> <p>22. Further research has highlighted the use of AI chatbots as a form of mental health support, with the Youth Endowment Fund reporting in 2025 that 25% of children had used them in this way over the last year. While the instantaneity and anonymity were highlighted as positives by children, there are concerns around the lack of safeguarding protections, reliability of the support offered, and lack of oversight in the chatbots outputs.</p>

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	<p>23. Other new and emerging risks associated with the use of AI include the rise of 'nudification' tools and other sexually explicit deepfake technology. Girlguiding UK found that exposure to this is increasing, with 26% of 13-18-year-olds having seen a sexually explicit deepfake in 2025. The Children's Commissioner noted serious concern in an April 2025 report that while possessing AI-generated sexual content featuring children is illegal, the AI models that create them were not.</p> <p>24. Ofcom's Online Safety in 2025 report noted the marked increase in the use of generative AI platforms, and outlined that it expected 'regulated providers to update their risk assessments as relevant new functionalities are rolled out, and to put safety measures in place where needed.'</p> <p>25. The evidence of experiences of children and young people demonstrates undoubtedly that this approach is not sufficient to effectively protect them from illegal and harmful content. NAHT therefore strongly urges Ofcom to proactively monitor online providers to assess new and emerging threats, and take enforcement action where appropriate.</p> <p>26. NAHT acknowledges the recently announced Ofcom investigation into X, specifically in relation to its AI platform Grok, as a positive step forward in addressing the scourge of illegal and harmful content being produced and distributed on the platform. However, NAHT is clear that this type of investigation and enforcement activity must be extended to all online providers not following the duties of the Online Safety Act, and not focus solely on the high-profile providers.</p>

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	<p>27. Overall, NAHT is supportive of Ofcom’s proposed Work Plan for 2026/27, but would urge the regulator to extend its proactivity in evaluating the effectiveness of safety mitigation measures, ensuring its responsiveness to assessing new and emerging threats to children and young people’s safety and conducting investigations and enforcement activity where appropriate.</p>

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