

Consultation response form

Your response

Question	Your response
The incidence of content that is harmful to children on regulated services We invite stakeholders to provide evidence relating to the incidence of PPC, PC or NDC on regulated user-to-user, search or combined services. Please provide as much detail as you can. This could include but is not limited to evidence about:	
The quantity, prevalence or presence of specific kind(s) of PPC, PC or NDC on regulated services and the frequency with which children are encountering this content.	Confidential? – N This evidence draws on a 2025 investigation by 5Rights examining “<i>Teen Accounts</i>” on Instagram.¹ According to Instagram, “<i>Teen Accounts</i>” are accounts automatically applied to users aged 13- 17 and designed to provide built-in, age-appropriate protections by default including reducing the likelihood that children encounter harmful material or unwanted contact.²
How demographic characteristics such as age, gender, race, sexual orientation and disability influence the	

¹ <https://5rightsfoundation.com/resource/case-study-is-instagram-now-safe-for-teens/>

² <https://help.instagram.com/995996839195964>

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likelihood that children will encounter specific kind(s) of PPC, PC or NDC.	In this investigation we found that harmful content as defined in the Online Safety Act (harmful challenges and abusive content) remains present and is encountered by children under normal conditions of use. These findings were backed up by similar investigations carried out by the Meta whistleblower Arturo Béjar, Molly Rose Foundation, Fairplay, ParentsSOS and Cybersecurity for Democracy also carried out in 2025 which found evidence of eating disorder, self harm and suicide content. ³⁴
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	These investigations identified: • Poor content moderation particularly in the <i>Reels</i> section. Abusive comments (PC) were commonly found, targeting individuals on the basis of their ethnicity, body size, gender and sexual orientation.⁵ • Exposure to suicide and self-harm content (PPC), violent content (including road traffic accidents and falling from great heights) (PC) and including content that normalises or aestheticises self-injury through an autocomplete function and content recommender system.⁶

³ <https://mollyrosefoundation.org/wp-content/uploads/2025/09/Teen-Accounts-Broken-Promises-How-Instagram-is-failing-to-protect-minors.pdf>

⁴ https://mollyrosefoundation.org/wp-content/uploads/2025/08/proof3_PervasivebyDesign.pdf

⁵ https://5rightsfoundation.com/wp-content/uploads/2025/04/TeenAccounts_Case-Study_Final.pdf

⁶ <https://mollyrosefoundation.org/wp-content/uploads/2025/09/Teen-Accounts-Broken-Promises-How-Instagram-is-failing-to-protect-minors.pdf>, p.38

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	Recommendation of accounts leading to eating disorder and extreme dieting material through Meta AI function (PPC/PC).⁷ These investigations indicate that exposure is not isolated or incidental with harmful content being encountered within short periods of ordinary 'scrolling'. This demonstrates that children may encounter PPC and PC multiple times within single sessions, and repeatedly over sustained periods of use. The testing suggested different exposure patterns linked to user characteristics, for example teen girl avatars were more likely to encounter sustained streams of eating disorder and self-harm content. Accounts engaging with anxiety, depression or grief-related material were more likely to be directed toward suicide and self-harm content. This indicates that certain demographic and behavioural signals increase the likelihood and frequency of encountering harmful content. This evidence indicates that, since the Protection of Children Code came into force, PPC and PC remain prevalent on at least one major regulated service and are encountered by children with material frequency. It is not only that it is accessible but systematically surfaced, promoted and legitimised through platform design. Interventions which purport to deliver an age appropriate and safe experience are not working effectively.
The severity of harm that UK children suffer, or may suffer, as a result of content that is harmful to children	

⁷ <https://mollyrosefoundation.org/wp-content/uploads/2025/09/Teen-Accounts-Broken-Promises-How-Instagram-is-failing-to-protect-minors.pdf>, p38

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We invite stakeholders to provide any evidence regarding the severity of harm that UK children suffer, or may suffer, as a result of encountering PPC, PC or NDC. Please provide as much detail as you can. This could include but is not limited to evidence about:	
The impact that specific kind(s) of PPC, PC or NDC can have on a child's wellbeing, behaviours, or other physical or psychological outcomes. This might include evidence concerning cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	Confidential? – N <u>Suicide and self-harm content</u> Evidence from the 2025 testing of Instagram “Teen Accounts” demonstrates that suicide and self-harm content is not encountered as isolated material, but frequently appears in clusters, reinforced by algorithmic recommendation systems. Once accounts engaged with mental health, anxiety, or recovery-related content, recommendation feeds rapidly began to surface increasing volumes of suicide and self-harm material. This pattern of exposure is typical of these design strategies and contributes to cumulative harm. Suicide and self-harm prevention research has consistently identified that repeated exposure to suicide and self-harm content can contribute to normalisation, desensitisation and reinforcement of harmful ideation, particularly among vulnerable children.⁸ The Molly Rose Foundation report highlights that recommendation systems can intensify this risk by generating immersive content environments in which harmful narratives are repeatedly presented within short timeframes.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	
How demographic characteristics such as age, gender, race, sexual orientation and disability can influence the severity of harm that UK children suffer, or may suffer, as a result of encountering specific kind(s) of PPC, PC or NDC.	<u>Body image and eating disorder content</u> Similar cumulative dynamics are evident in relation to body image and eating disorder content. Testing conducted by the 5Rights Foundation and the Molly Rose Foundation found that minimal interaction with dieting, fitness or body-related material resulted in sustained recommendation of increasingly extreme dieting and appearance-focused content. Such clustering is particularly concerning given established evidence linking repeated exposure to unrealis-

⁸ <https://pubmed.ncbi.nlm.nih.gov/38848950/>

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	tic or idealised body imagery with negative body satisfaction, disordered eating behaviours, anxiety and depression among children.⁹ The available evidence indicates that cumulative exposure materially increases the severity of harm associated with both suicide and self-harm content and body image and eating disorder content. Where recommender systems repeatedly surface similar harmful material children become immersed and can become victim to ‘rabbit holes’ of harmful content. This is likely to heighten psychological risk, particularly for children already experiencing vulnerability. <u>Abuse and bullying content</u> Similar dynamics are also evident in relation to abusive and bullying content. Evidence indicates that when children encounter or interact with content relating to harassment, humiliation or peer conflict, recommender systems can surface further material that normalises or amplifies abusive behaviour. This can include videos of bullying incidents, commentary that mocks or shames individuals, or content that encourages pile-ons and harassment. Research has demonstrated the relationship between online bullying and a range of negative outcomes for young people, including increased levels of anxiety, depression, loneliness and reduced self-esteem.¹⁰ When algorithmic systems repeatedly promote similar content, they reinforce hostile content and increase the likelihood that children experience harmful interactions online.

⁹ <https://link.springer.com/article/10.1007/s10964-025-02159-y>

¹⁰ <https://www.mdpi.com/2227-9067/13/3/367>

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Whether it is appropriate to make changes to the kinds of PPC and PC in the Act We invite stakeholders to provide evidence that suggests any kind(s) of PPC and/or PC in the Act are inappropriate or incorrectly categorised. This could include but is not limited to evidence indicating that:	
Any kind of PPC or PC in the Act should cease to be categorised as content harmful to children.	Confidential? N We do not consider that any currently designated categories of PPC or PC should cease to be categorised as content harmful to children. On the contrary, emerging evidence indicates that certain categories presently treated as a lower risk warrant clearer and more consistent classification as Priority Content (PC), and that scope should be broadened to reflect the material risks identified in recent research.
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – N
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – N
We invite stakeholders to provide evidence in support of additional kind(s) of content being added to the PPC or PC categories in the Act. This should include, but is not limited to:	
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – Y

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Evidence that the kind(s) of content pose a risk of significant harm to children.	<u>Classification of “body stigma” and “depression” content as Priority Content</u> There is sufficient evidence to support the explicit classification of content that promotes or reinforces body stigma, and content that normalises or aestheticises depression in children, currently classified as “NDC” as “Priority Content” (PC).
Evidence to support each kind of content being categorised as either PPC or PC.	Evidence from the Children’s Commissioner for England demonstrates that children are routinely exposed online to appearance-focused messaging, including commercialised content promoting weight-loss products, cosmetic modification, and appearance-altering techniques. This research¹¹ found that: • Children are systematically exposed to content that promotes narrow appearance ideals. • Appearance-focused content is frequently algorithmically amplified. • Exposure is widespread across social media platforms used by children. The report further identifies links between appearance-driven content, body dissatisfaction and poor mental wellbeing, particularly among girls. Given the scale of children’s exposure to such content and the established links to adverse psychological outcomes, we consider that this category meets the threshold for classification as Priority Content. Similarly, content that normalises depression, presents depressive states as aspirational or identity-defining, or discourages help-seeking can contribute to reinforcement of harmful cognitive patterns.¹² While not all depression-related content is harmful (and some may

¹¹ <https://www.childrenscommissioner.gov.uk/resource/a-healthy-influence-childrens-exposure-to-appearance-changing-products-online/>

¹² <https://www.frontiersin.org/journals/psychology/articles/10.3389/fpsyg.2022.880065/full>

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	be supportive), content that aestheticises or entrenches depressive ideation poses a material risk of psychological harm, particularly when amplified algorithmically. In both cases, the risk arises not only from individual pieces of content but from cumulative exposure and reinforcement. <u>Broadening “Eating disorder content” to Include “Content which encourages weight control” in Children</u> We further argue that the existing category of “eating disorder content” should be broadened to encompass content which encourages weight control in children, including content that promotes restrictive dieting, appetite suppression, extreme calorie control, the use of weight-loss products, steroid drugs and “bulking products”¹³ and misinformation regarding food advice.¹⁴ The current definition risks capturing only explicit pro-eating disorder material, while excluding large volumes of content that: • Encourages calorie restriction or weight loss in children; • Promotes “thinness” as a prerequisite for social validation; • Markets appetite suppressants, detox products, steroid misuse or cosmetic alterations to children; • Reinforces body stigma and weight-based shame. The Children’s Commissioner’s research evidences the exposure of children to weight-loss products, cosmetic

¹³ <https://counterhate.com/blog/young-brits-viewed-steroid-content-on-tiktok-89-million-times/>

¹⁴ https://5rightsfoundation.com/wp-content/uploads/2025/04/TeenAccounts_Case-Study_Final.pdf, p10

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	modification messaging and appearance-altering content online. This material is often presented as aspirational, normalised and commercially incentivised. There is strong evidence that dieting behaviours in childhood are associated with increased risk of eating disorders.¹⁵ Encouraging weight control in children even where framed as “wellness” or “fitness” poses a foreseeable and significant risk of harm. Emerging research indicates that social media <i>fitspiration</i> (“fitspo”) content, for example, is associated with a range of psychopathological risks that go beyond benign encouragement of exercise and healthy living.¹⁶ A review of the evidence found that exposure to <i>fitspiration</i> content is linked with negative effects on body image, excessive exercise behaviours, body dissatisfaction, appearance-related anxiety, depressive symptoms and unhealthy control of eating habits among young people. Given these documented associations with adverse psychological outcomes content characterised as <i>fitspiration</i> should be more robustly addressed within the regulatory framework. Specifically, content that promotes weight control, unrealistic body ideals, or excessive body optimisation (even when framed as fitness inspiration) should be designated harmful content. Doing so would more accurately reflect the evidence¹⁷ showing that exposure to such content, which happens cumulatively through recommender systems, poses material risks of significant

¹⁵ <https://www.sciencedirect.com/science/article/abs/pii/S0002822306000046>

¹⁶ <https://www.sciencedirect.com/science/article/pii/S2667118221000088>

¹⁷ <https://www.mdpi.com/2673-8392/4/4/111>

Question	Your response
	harm to children's mental wellbeing and body image development.

Please tell us how you came across about this call for evidence.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

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