

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:

Warning: this response contains references to content that may be upsetting or distressing, including discussions of sexual violence, self-harm and eating disorders.

Continued Exposure to Harmful Content Despite the Online Safety Act

Although the Online Safety Act came into full force on 25 July 2025, children supported by Barnardo's services continue to encounter PPC and PC across regulated platforms. Evidence gathered from frontline practitioners and two focus groups with children and young people demonstrates that harmful children and young people are still exposed to the harmful content under the Register of Risk.

Practitioners described disclosures happening:

- "very often,"
- "most sessions," and
- as a "very regular occurrence."

Some practitioners said that many children "hesitate to disclose details," indicating that actual incidence is significantly higher than what comes to light. This challenges any assumption within the risk register that lower reported prevalence equates to lower real-world risk. Underreporting, particularly among vulnerable children, means that exposure pathways rather than observed frequency, should also form the basis of Ofcom's harm categorisation.

PPC and PC Categories Encountered

Pornography, self-harm, suicide and eating disorder content was cited by practitioners as the most common type of harmful content reported by children and young people. It should also be taken into consideration that children and young people may report exposure to PPC categories more often than PC categories due to identifying that they are definitely harmful – it may however be less clear cut to children and young people that PC is harmful despite the long-lasting impacts.

Children Disproportionately Exposed to Harm

Practitioners highlighted heightened exposure among:

- Care-experienced children

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	• Girls (particularly relating to self-harm, suicidal ideation, body image) • Isolated children • Neurodivergent children • Children with mental health needs or safeguarding concerns Platform risk assessments must therefore consider differential vulnerability and mandate safety measures that adapt to how harms manifest across diverse user groups. Platforms and Features Where Harmful Content Is Most Frequently Encountered Children and practitioners identified (in order of most cited): • TikTok • Reddit • Instagram • YouTube • Snapchat • WhatsApp • Call of Duty, Twitch (gaming platforms) The children and young people in our focus groups identified features online where they most commonly encounter harmful material (in order): • Multiple exposure pathways were highlighted: • Algorithmic feeds (e.g. TikTok 'For You Page') • Peer-to-peer sharing (WhatsApp, Snapchat) • Search results and recommendations (YouTube, Reddit) • Comment sections (across platforms where bullying and incitements of hate were more frequently found) Because each platform presents multiple, reinforcing routes to harm. A platform with strong search restrictions but permissive comments regulation, for instance, still presents high risk.

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	Age Assurance Failures and Exposure to Pornography Pornography was one of the most frequently cited PPC category. A desk-based review by Barnardo's found Pornography sites which either have no age verification in place or frequently use "image-gates" which are sexually explicit accompanied by long and explicit titles which children are exposed to before age verification. Titles include which include: • [REDACTED] • [REDACTED] • [REDACTED]" Even without direct disclosures from children, the availability of explicit pornographic titles and thumbnails, and the ability to browse through explicit categories before verification, represents a realistic risk of exposure to harmful content. amendments under consideration in the Crime and Policing Bill at the time of responding would render depictions of incest, step incest, adults dressed and children and strangulation illegal. However, their current prevalence illustrates how "barely legal" content saturates platforms, which children are still exposed to Algorithm-Driven Exposure Focus group participants said they <i>"fall down a rabbit hole with recommendations because of the algorithm."</i> They described they are particularly susceptible to this when they intentionally seek harmful content to deal with their own issues or to feel less alone. They described being drawn into cycles in which platforms serve progressively more extreme content based on prior engagement. Platforms should be obligated to demonstrate how their systems detect and interrupt the risk of repeated and escalating exposure to harmful content. Platform Inconsistencies Around PPC enforcement Young people expressed confusion and distress over inconsistent enforcement:

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	• <i>“you can find some very, very graphic stuff on Twitter [X]...how come showing scars [on one platform] is promoting self-harm... but I can find very graphic images of it on another website?”</i> This inconsistency leaves children feeling unprotected as there isn’t standardised enforcement across platforms. Children’s Ability to Circumvent Age-Verification Participants acknowledged: <i>“...there are work arounds like VPNs and stuff”</i> Barnardo’s is concerned about the number of non-compliant sites which children are still able to access without circumvention methods. Additionally, with regards to circumvention via VPNs, Barnardo’s calls for platforms to ensure that age verification systems still verify users whilst using VPNs as is standard practice amongst industries like gambling through ‘geolocation.’¹ Recent Encounters with Harmful Content When asked when they last encountered harmful material, children and young people all voted “very recently.” • A participant in our focus group identified that a month ago, “I remember seeing a very explicit violent video of somebody... dying and... getting shot and that was extremely uncomfortable.” The evidence gathered from practitioners and young people makes clear that harmful content continues to reach children and young people through multiple pathways across regulated services. The persistence and cumulative nature of these harms, alongside the clear vulnerabilities of groups of children and systemic failures in platform design, demonstrate that current protections remain insufficient. For the Online Safety framework to deliver on its intended purpose, regulation must focus not only on individual pieces of content, but on the systems and design choices that expose children to

¹ Age Verification Providers Association (AVPA) 2025, VPNs are not kryptonite to age assurance, published 9 August. Available at: <<https://avpassociation.com/thought-leadership/vpns-are-not-kryptonite-to-age-assurance/>> (Accessed 10 March 2026).

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	risk. Addressing these drivers could reduce children's encounters with PPC, PC and other forms of harm online.
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
How demographic characteristics such as age, gender, race, sexual orientation and disability influence the likelihood that children will encounter specific kind(s) of PPC, PC or NDC.	Confidential? – N
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – N
The severity of harm that UK children suffer, or may suffer, as a result of content that is harmful to children 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:	Warning: this response contains references to content that may be upsetting or distressing, including discussions of sexual violence, self-harm and eating disorders. PPC: Pornographic Content A 2024 study found that individuals who viewed violent pornography exhibited higher rates of sexual aggression, hostility toward women, and emotional regulation difficulties. These patterns indicate deeper psychological disturbance and trauma-linked responses.² With pornography cited the most frequently as PPC children are still exposed to by Barnardo's practitioners, we are concern about "barely legal" content widely available on both compliant and non-compliant platforms which frequently includes depictions of incest, step-incest, or

² Dolan, E.W. 2024, Violent pornography viewers show higher rates of sexual aggression, sexism, and psychopathy, PsyPost, 9 September. Available at: <<https://www.psypost.org/violent-pornography-viewers-show-higher-rates-of-sexual-aggression-sexism-and-psychopathy/>> (Accessed 10 March 2026).

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	material that encourages an interest in child sexual abuse (CSA). Barnardo's frontline practitioners reported a direct causal link between viewing pornography and developing harmful sexual behaviours in children. Frequent and cumulative exposure increases children's vulnerability to sexual exploitation. Additionally, a meta-analysis has found increased harmful sexual behaviours (HSB), including boundary violations among peers, while systematic reviews demonstrate associations between exposure and earlier onset of sexual activity, indicating a relationship between exposure and subsequent harmful behaviour.³ A case study from Barnardo's provided evidence that children sometimes try to understand their own sexual abuse through pornography. On viewing pornographic content, children often find images and videos normalising illegal behaviours. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] We urge Ofcom to adopt a much swifter approaches to identifying and enforcing against non-compliant pornography sites to ensure that children cannot access them. On Monday 2nd March, amendments in the Crime and Policing Bill to remove depictions of incest, step-incest and adults mimicking children in pornography were passed, alongside the Government's commitment to ban strangulation pornography. While these forms of content will fall within the scope of illegal content once the legislation comes into force, they remain widely available to children today due to slow or incomplete enforcement against non-compliant platforms.

³ Mori, C., Park, J., Racine, N., Ganshorn, H., Hartwick, C. & Madigan, S. 2023, Exposure to sexual content and problematic sexual behaviors in children and adolescents: A systematic review and meta-analysis, Child Abuse & Neglect, vol. 143, 106255.

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	Given that children can still ordinarily access a significant number of pornography sites, we expect Ofcom to introduce faster oversight mechanisms to prevent ongoing exposure to pornography in general but especially “barely legal” pornography. This material not only contains graphic and often extreme content, but also normalises sexual abuse, blurs critical familial boundaries, and shapes highly distorted expectations of relationships, consent and power. PPC: Suicide, self-harm and eating disorder (ED) content Self-harm and suicide content poses immediate and severe risks. For children with mental health needs, front-line practitioners highlighted that suicide, self-harm and eating disorder content, or drug content has an immediate causal impact on children. Barnardo’s practitioners reported that children they support immediately begin testing new drugs, new forms of self-harm and new forms of suicide attempts. Viewing images, instructions or personal accounts even once can increase suicidal ideation, reduce help-seeking, and normalise self-injury. Online communities often provide explicit guidance related to eating disorders or self-harm that accelerates illness severity.⁴ Children and young people in our focus groups discussed how eating disorder and self-harm content sparks competitiveness when they were exposed to content where someone was seen to be “better” than them at self-harming: • A participant explained how when he saw images of people who had self-harmed, he thought, [REDACTED] [REDACTED] [REDACTED] Young people in our engagement sessions emphasised that while harmful, some ED or self-harm content can make them feel less alone.

⁴ iaedpfoundation 2025, Impact of Pro-Eating Disorder Content Online, published 30 June. Available at: <<https://edr.iaedpfoundation.com/pro-eating-disorder-content-impact/>> (Accessed 10 March 2026).

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	• <i>“Their journey of eating disorder...helped me like feel less alone. But...this is blocked now. It's like, fine, I'll just feel this on my own then...the reason why we seek that content is so we feel less alone, not necessarily because we want to feel worse.”</i> They also discussed feeling confused about what they could share about their own struggles online without being censored: • <i>“At that point, am I then encouraging someone else to try and get worse because of how they've read something that I've written?”</i> They also expressed frustration that ordinary expressions of distress can be misinterpreted by enforcement systems: • <i>“if I... go on a rant about my mental health. they could then take that as you're promoting self-harm, you're promoting suicide when actually I was just having a bit of a rant about how my mental health was that day.”</i> PC: Content which incites hate In 2024, we ran a survey of our frontline practitioners working with children across the UK. Based on 938 replies we found: • 29% said they were seeing more children affected by misogynistic content online, compared to this time last year. • 29% also said they were seeing an increase in child-on-child sexual abuse and/or children displaying problematic or harmful sexual behaviour, compared to this time last year. A practitioner at Barnardo's also reported: <i>“In line with Andrew Tate and all of the awful online stuff that we've been seeing, I think that's kind of, hitting the older age range at the moment. But I can see that filtering down to the younger children as well in terms of what they're watching and what they're seeing online becoming more normalised and affecting behaviour, particularly amongst boys and young men.”</i> This interaction between misogynistic online content and harmful pornography contributes to a wider envi-

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	ronment in which violence against women and girls becomes normalised which has escalated both attitudinal and behavioural harms.⁵ NDC Participants of our focus groups frequently spoke about body-shaming content, particularly “skinny-tok” which had effects on their own body image. • <i>"Skinny tok with...everybody wanting to get down to like a size negative 2, which like I don't find very helpful... If I was younger, [I] would have internalised that. And I think it's very easy to become influenced and to absorb everybody else's opinions when you don't know who you are."</i> Long-Term Impact of Cumulative Exposure to PPC, PC and NDC • <i>"I've just become so desensitised to this sort of stuff now...that might just be the amount of exposure that I had as a young person"</i> This shows that repeated exposure reduces emotional responsiveness to harmful, sometimes illegal content, reducing a child or young person’s ability to recognise risk. • <i>"The whole thing on Twitter [X] when Grok was removing the women's clothes... when you're young you think everything is a joke. it's very easy to brush it off as a joke and then you see loads of people doing it more and more and more. And then I feel ...you begin to think "what's the big deal?""</i> Normalisation can occur when harmful behaviours are repeatedly shown. This can have a negative impact on children and young people, who may interpret harmful content as humorous. This can also be compounded by “meme culture” where harmful or misogynistic ideas are

⁵ The Behavioural Architects 2021, The relationship between pornography use and harmful sexual attitudes and behaviours: literature review, Government Equalities Office, published 15 January. Available at: <<https://www.gov.uk/government/publications/the-relationship-between-pornography-use-and-harmful-sexual-behaviours/the-relationship-between-pornography-use-and-harmful-sexual-attitudes-and-behaviours-literature-review>> (Accessed 10 March 2026).

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	packaged into jokes that feel harmless and socially acceptable.⁶ • <i>“stuff about body image and I guess traits about someone, whether it be physical appearance or personality, I feel like if you see those over time, that can kind of be hammered home..like this is fact.”</i> • <i>“But I think like explicit, like violent videos, like that video that I saw. I only saw it once of somebody getting shot, but I still remember it. And it was only a month ago, but I probably will still remember it in a year.”</i> • <i>“you just find yourself thinking because the brain believes what it sees or what's been said to it a lot, not what's actually true. So if you're scrolling online and the algorithm keeps on pushing this, then you're going to believe that and then that could just have an impact on how you relate to people.”</i> This highlights that harmful material becomes more influential when exposure is cumulative. Children and young people are not only exposed to harmful narratives but are repeatedly shown them in ways that mimic persuasion and conditioning. When the same messages are algorithmically prioritised, they begin to feel that the material is credible and socially validated, even when it is objectively false or harmful.
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

⁶ Kanwar, K., Chauhan, D.S., Singh, G.V. & Ekbal, A. 2025, What is Beneath Misogyny: Misogynous Memes Classification and Explanation, arXiv preprint arXiv:2508.03732v1, published 30 July. Available at: <<https://arxiv.org/html/2508.03732v1>> (Accessed 10 March 2026).

Question	Your response
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – N
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.	Confidential? – N
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:	Barnardo's supports the current categorisation of PPC, given the clear and well-established harms it poses to all children. Such content can significantly undermine children's mental and developmental health and negatively shape their understanding of the world, regardless of age or demographic characteristics. We do however urge swifter enforcement and oversight of websites that are not compliant with age-verification to ensure children and young people cannot normally access pornography. We know that children and young people are also exposed to sexualised content that does not meet the threshold for pornography but is still harmful. Under BBFC classification,⁷ sexualised content in films and TV shows are age-rated to reflect varying levels of risk; yet this important distinction is not currently reflected in the Register of Risks. We recommend including sexualised content in the PC category and ensuring that platforms are robust with knowing the age of their child users to ensure their experiences online are age appropriate. We view the categorisation of content that incites hate and bullying as less clear-cut. Hate-inciting content disproportionately targets minoritised children and young

⁷ British Board of Film Classification (BBFC) 2024, BBFC Classification Guidelines, BBFC. Available at: <<https://darkroom.bbfc.co.uk/original/ce0ab668a4e5b93e7700a03579b138c6:bebc6c5a654b0e98882bca7014157f55/2024-bbfc-classification-guidelines.pdf>> (Accessed 10 March 2026).

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	people; if these harms were experienced by a wider group, we question whether this content would have been designated as PPC. We are concerned that insufficient consideration has been given to the severe and long-term impacts this content has on minoritised groups. We also note that some platforms hosting PC content do not reliably capture the ages of child users, and we would therefore expect stronger accountability mechanisms for those services. Although it may fall outside the immediate scope of this consultation, Barnardo's considers it important to provide clearer definitions and duties relating to Non-Designated Content (NDC). NDC is not currently captured by the Online Safety Act, leaving platforms with limited obligations to prevent children's exposure to content relating to body stigma or depression. While some of this material can provide valuable support to children and young people, particularly those seeking connection and understanding, we are concerned about the effects of algorithmic amplification. Repeated exposure to some types of NDC can and does escalate into exposure to PPC categories such as suicide or eating disorder content. Even exposure to NDC content relating to body stigma or depression cumulatively can and have long lasting impacts on children's moods and body image. We urge greater scrutiny of algorithmic design and recommendation systems to mitigate cumulative harms.
Any kind of PPC or PC in the Act should cease to be categorised as content harmful to children.	Confidential? – N
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

Question	Your response
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? – N
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – N
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – N

Your response

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)

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