

Your response

In March 2025, a series of seven focus groups were conducted with children in relation to their everyday interactions with social media platforms and their experiences with user-generated content with the potential to cause them harm. This consultation response largely draws from the data collected in these sessions [<http://doi.org/10.17639/nott.7627>] and the thematic analysis of the responses given across the participant range. In total, 72 participants were recruited across the age range (11 aged between 11-12 years old – Year Seven, 11 aged between 12-13 years old – Year Eight, 12 aged between 13-14 years old – Year Nine, 10 aged between 14-15 years old – Year 10, 8 aged between 15-16 years old – Year 11, 12 aged between 16-17 years old – Year 12, and 8 aged between 17-18 years old – Year 13) and there was a 48.6%/51.4% female/male split amongst the participant sample. The School from which participants were recruited incorporated specific educational sessions and initiatives into their wider curriculum concerning online safety, suggesting that the participants may have been more aware of safety strategies and the risks associated with interacting on social media platforms in connection with the potential presence of harmful content than the general adolescent population nationally. The research sought to understand:

- 1) when and where children interact with potentially harmful content as part of their everyday, unprompted interactions with social media platforms; and
- 2) how they determined a piece or interaction with content to be harmful or not, focusing largely on NDC in analysis.

Both of which are relevant to and have informed this consultation 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? – Y / N When asked about the quantity, prevalence and specific kinds of primary content (PC), primary priority content (PPC), or non-designated content (NDC) on user-to-user services, children we spoke to responded in a manner than does not use same definitions or phrasings as that included in the 2023 Act Section 60, 61, and 62. However, upon analysis of responses, and due to the focus of the study on NDC overall, many of that which was described by participants can be placed within this category.

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	It is apparent from engaging with children in relation to their everyday experiences and interactions with services and UGC that have the potential to cause them harm, when they see UC that could be PC, PPC, or NDC, this is not because they are looking for it. Instead presentation is largely unprompted and as part of their 'typical' interactions. Across groups, when asked about how potentially harmful UGC was presented to them, participants indicated that they had done nothing to cause the UGC to appear to them in their interactions. It appeared wholly unprompted. One notable example is one where a participant was recounting how even when they did search for a specific type of content – that related to football – they were still presented with UGC they considered potentially harmful despite 'innocent' search terms being used in the first instance. Regarded as "random" by another, the presentation of UGC with the potential to harm children was an element of their online lives and interactions that they felt they had little to no control over, and that presented (potentially PC, PPC, or NDC) was not in line with the other UGC they would positively interact with. It is clear that the participants spoken to in this study see the presentation of potentially harmful content as part of their everyday interactions. Suggesting that underlying platform mechanisms, such as personalised feeds and/or recommender systems, are a factor in the way in which children encounter UGC that could be considered as PC, PPC, or NDC. This aligns with Ofcom's 2023 Online Nation findings that noted how recommender feeds are a vehicle for interactions with potentially harmful content. Participants indicated that there was no consistency when it came to how frequent interactions were. However, as this study aimed to understand how children interact with and encounter content with the potential to cause them harm in their everyday lives, this gave some parameters in which conclusions can be drawn as participants were informed of this. As a part of icebreaker activities, an attempt to obtain a baseline of the time participants spent online on platforms containing UGC interacting with content was undertaken, however as participants used traditional time metrics to respond and there were inconsistencies in whether a participant said "X

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	amount of hours a day” or “X hours” in general, no definitive conclusions could have been reached in hours spent. Nevertheless, when participants recounted specific interactions that they would consider harmful, the researcher followed up to understand how frequently these were taking place. Where this took place, one participant indicated a semi-frequent exposure to content that had the potential to harm them and within the NDC context of the study, can be categorised as such. Importantly, they articulated this not in the expected language of “harm” or “harmful”, instead using synonymous terms - a trend evidenced across the entire participant group - such as “weird”. It is possible that due to understanding interactions in synonymous terms and making determinations that do not align with the regulatory language, children are encountering UGC that could be objectively deemed as PC, PPC, or NDC, but due to their non-aligned interpretation of encounters, they are not regarding this as such when asked. It is also possible that children are not, in their own opinions, encountering UGC that could be objectively regarded as PC, PPC, or NDC as they view such as normal and non-harmful to them due to building a tolerance due to everyday exposure. When talking about their interactions that were “weird”, “uncomfortable”, or “disgusting” participants conveyed that these were not out of the ordinary when it came to their everyday interactions, demonstrating that for some, interactions with objectively harmful content (potentially PC, PCC, or NDC) has become normalised for those who view and interact with it, so it is not of note when asked. In one interaction, a participant indicated to the researcher that as time had passed, UGC, which would have once been considered of note due to its potential to harm, is no longer regarded as such due to the individual seeing the same or similar content “so many times” they no longer felt it impacted them. This shows that not only are children potentially not recognising UGC (PC, PPC, or NDC), which is potentially harmful to them due to understanding interactions differently from those that are presented in regulations, but they are also not recognising interactions and UGC as harmful due to reaching a level of desensitisation. When asked about their everyday experiences with U2Us, children aged between 11-18 told us that when they see content with the potential to harm them online, this is unprompted by them as users and when they do view content they perceive as potentially harmful, they

Question	Your response
	do not always take action against it via the platform-based features such as reporting. The quantity of this varied from participant to participant. However, within one group there was a distinct discussion around a period of time at an early point where there had been a day where participants noted that one service - Instagram - appeared to have a large amount of content that was being presented to them unprompted and continuous. In these circumstances, one participant suggested their evasive action was not to report this onslaught of NDC content they would consider harmful, but to move platforms entirely for the remainder of the day. This shows that there is no typical interaction with U2Us nor an expected course of action to negate potential harms. Whilst reporting mechanisms are present on the platform in question and platforms more widely, it is apparent that children do not use these as part of their experiences and interactions with U2Us, instead favouring other methods to remove themselves from a position of potential harm. Children reported a range of content types, and where possible, the Section 236(1) definition was used to gain clarity on the types of content that could be vehicles for NDC. This had varied success as the children did not associate the terminology used within the legislation as types of content, instead preferring more simplistic, colloquial terms, or simply referring to the UGC type by using the specific platform name for the feature e.g. "reels", "for you page", "Snaps", all unique to individual platforms. This tells us that when asked to articulate the content they interacted with and felt was notable in relation to harm, children diverged from the understanding and descriptors contained within the legislation. Whilst the 2023 Act has largely been written for regulated services to understand the duties and obligations they owe and the instructions they need to follow to adhere to these in relation to identifying content, it is possible that children will not see the reduction of harmful content as what they understand to be content could be different to that which is formally regulated due to such linguistic nuances and disparities.
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? – Y / N N/A

Question	Your response
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – ¥ / N Within the focus groups, children indicated that some platforms were seen as more harmful than others. When responding and engaging in discussions around platforms where they might find content that has the potential to, or has indeed harmed them, participants indicated that whilst safety features are present across platforms they use in their everyday lives, they feel that these create an illusion of safety rather than being integral parts of their safety strategies (as above). Whilst there was no consensus on what platforms were more harmful on the whole across the participant group, primarily due to each individual having subjective experiences online and making individual decisions based on their own personal backgrounds, which has the potential to harm them. Some participants reported that YouTube was perhaps 'safer' than other U2U's due to content, such as movie trailers, having already gone through external controls such as classification by the British Board of Film Classification (BBFC) and similar regulators. While in this specific instance, the participants have misunderstood the process through which UGC is presented on YouTube externally before being uploaded. As it is only trailers for theatrical exhibition that are classified by the BBFC, and these age ratings cannot be used by video streaming services or video-on-demand services to indicate if a video (in the context here, a piece of UGC) is or is not likely to be age-appropriate for children of different ages. Despite this error in understanding, these comments and discussions reveal sufficient information about how the platform is viewed relative to others, where there are no apparent external control mechanisms to make it seem more 'safe' from their perspective. However, others felt that platforms' guidelines were inconsistently applied, and this, coupled with an observed overall lack of action on content by platforms, raised questions about the overall safety of the service. The aim of the focus groups carried out was to understand where children encounter potentially harmful content on social media platforms. Therefore, the findings are somewhat limited to user-to-user services. However, across the participant groups, some platforms were recalled by name more so than others, notably Instagram, Snapchat and TikTok were raised as platforms where, in their everyday interactions, children felt they had encountered potential NDC.

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	When engaging in direct dialogue with the researcher, participants passed judgment on platforms, but also indicated that external factors and events could also impact their determinations of platforms that are 'safer' than others. TikTok and X (formerly Twitter) are more recognised by children for their real-time, potentially harmful UGC than others. TikTok was raised as a service in which children were more likely to encounter NDC, notably due to the presence of livestream videos within the main user "for you" feed alongside UGC that is not real-time in nature and thus would have gone through some internal content moderation process. There was a split between children informing us that the nature of the livestream was potentially harmful to them - with specific instances of "beefing" lives being recalled where two individuals (potentially known to each other) were asked to join the live by a facilitator (the individual who's account started and has control over the live stream) and then instructed to engage in "beefing" with the other individual - described by participants to be verbally provoking or attacking the other by making derogatory comments aimed at the other individual on the livestream. When these were raised by participants, they indicated that they were less concerned about the harm to themselves as observers, and more concerned with the potential harm to those taking part. They presented as somewhat conflicted in this regard, as they recognised that whilst it was not nice to see the individuals "beefing" one another, there was some recognition that these individuals had volunteered to take part in the livestream overall and had placed themselves in a position where they may be on the receiving end of comments or actions that could cause them potential harm. One notable additional example informed us of the potential for platforms to be conduits for interactions with UGC that could cause them harm. One participant recalled one instance where they were exposed to a 'call to action' on Snapchat that instructed them to then go to another platform, Pinterest, to see UGC depicting a fight between two individuals which the found to be potentially problematic. Whilst the eventual UGC depicting the fight could fall under Section 62(6)(a) or (b) as such which depicts injury or violence against and person, without further clarity on specific thresholds contained within Section 60(2)(c) (see below for analysis and comments on this) the initial instance where links are shared to individuals to encourage them to access such further

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	content could be held to be NDC via a retrospective analysis.
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:	
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? – Y/ N As mentioned above in relation to the quantity, prevalence and presence of specific types of PC, PPC, and NDC present on regulated services, engagement with participants informed us that the frequency at which they are encountering potentially harmful UGC means that they are becoming desensitised to it and this will likely have an impact on their overall wellbeing. Whilst it was not possible to ascertain a definitive time period of how frequently participants were seeing or interacting with content that, objectively, could cause them harm, due to inconsistent answers, the overall framing and preamble to questions and discussions introduced participants to the focus of unintentional, everyday interactions, providing some context to the findings. It is clear that children are being impacted by what they see online, which could be objectively identified as PC, PPC, or NDC, as they are no longer registering this as harmful, as indicated above. This wholly suggests that when assessed cumulatively, exposure to UGC that could be (this study largely focused on NDC as part of the wider project in which it was undertaken) PC, PPC, or NDC, is having an adverse impact on children, as they are

Question	Your response
	potentially becoming desensitised to it when it is appearing in their feeds and on their devices as part of their interactions. The unprompted nature of interactions is also of concern and can potentially have an adverse impact on children overall. As stated above, it was apparent when engaging with participants and discussing interactions, when they see UGC that could be potentially harmful, they are not looking for it nor prompting it to be presented to them. This is likely to contribute to that cumulative harm related to desensitisation, as well as present a new avenue for harm to occur outside of the content itself due to the manner in which it is presented. Whilst the 2023 Act stipulates that services must be “safe by design” (Section 1(2) and it has been largely introduced due to the insufficiencies of platform efforts in making their services safe by design, it is clear that unprompted exposure has the potential to continue.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – ✘ / N As articulated in relation to specific questions in this response, it was seen in that participants felt that specific interactions with UGC caused them harm in some way. Or at least cause them discomfort, feeling “weird” or “uncomfortable”. Suggesting a causal link between children encountering NDC and harm occurring. This is of particular note within this study as it sought to understand the everyday unprompted interactions, as this indicates that, as explained in the above “quantity, prevalence or presence” response, that there are no specific triggers or causes for PPC, PC, or NDC to appear to children, suggesting that causal links are not easily predicted or potentially categorizable due to the unprompted nature of interactions/exposure.
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	Confidential? – Y / N

Question	Your response
encountering specific kind(s) of PPC, PC or NDC.	
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? – Y / N
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – Y / N
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – Y / 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 / N When some examples of UGC with the potential to harm were presented and raised as such within groups, it was indicated that it, akin to such impacting an “appreciable number”, such as the UGC depicting cats purposefully being injured, explored below as PC UGC, would only be

Question	Your response
	removed should multiple children report it. One participant explained how they believed mass reporting by multiple users would prompt action by TikTok, but this was contradicted by the account of another participant, who illuminated that whether someone considered themselves adversely impacted and thus likely to report would depend on their personal background. This illuminates a wider issue seen via engagement with children regarding UGC that they determine as harmful. Whilst the sessions focused on understanding how harmful content was presented to children in their everyday lives in the first instance, it also sought to understand how children make determinations of whether or not UGC is harmful or not and unpacked the factors and decision making processes where children make such a choice. The data revealed that not only do children use synonymous terms rather than “harm” or “harmful” to describe UGC they encounter and persistent exposure to potentially harmful content can cause an degree of intolerance, It also revealed that determinations of harm occur at a subjective, local level for individuals, this is likely to cause issues for a national level legislation with thresholds such as an “appreciable number”. “Harm” as an eventual impact to children was shown to be subjective to individuals. With participants asking what was meant by the term when asked about their interactions with UGC that they felt might have been harmful to them or caused them harm. Individuals indicated that various, subjective, factors influenced whether or not they determined UGC as harmful or not, such as their familial dynamics, personal beliefs, self-awareness, and education. Whilst the latter within this group of participants was likely to be largely the same due to each being recruited from the same secondary school, this cannot be stated for a fact due to their individual past schools potentially differing, and the personal nature of learning also being subjective. This has ramifications for not only the UGC that can be said to be likely or evidenced to impact “an appreciable number” but also provides insights into how the threshold is set to operate overall.

Question	Your response
	Firstly, it was observed across the data and participant responses that determinations of harmful/not harmful occur at a personal level, rather than en masse, akin to an “appreciable number.” These subjective, differential determinations of whether or not interactions were harmful or not suggests that, unlike the 2023 Act, children do not place their experiences in clearly allocated categories that either cause them “physical or psychological” harm (Section 234(1) therefore to have a threshold that is arguably reliant on U2Us making a call on whether or not a type of UGC will harm an “appreciable number” may not work in practice as children are unique in their determination. Whilst trends can be observed, at an everyday level, it is possible that each child will reach different conclusions as to whether a type of UGC or one with a theme e.g. body image content will harm them or not, as seen in the data where conversations like this took place. One participant not finding something harmful, but others indicating that this was potentially harmful to them. This is representative of a wider mismatch between the national nature of 2023 Act’s operation and the local determinations of children making decisions which, whilst potentially influenced by national level interventions such as curriculums, are not always done in line with an “appreciable number of children.” This was seen at the most intimate level, with some participants explaining that factors such as the instinct and urge for physical space from a UGC influenced if they would be harmed or not, which arguably cannot be foreseen across an “appreciable number.” Secondly, despite a lengthy drafting process and accompanying explanatory notes, it is arguably unclear that which would be determined to be an “appreciable number” for the purposes of regulation and categorising content as harmful or not. The 2023 Act explanatory notes state that NDC would not be considered harmful if it impacted “only one child or very few children”. However, as seen in the data here it determinations of harm are more nuanced than a reaching a number of children impacted. The mission of the Act is to ensure that children, widely accepted to be all children, are to be protected from UGC that could harm them, so to have such a threshold that would arguably not cover the examples of

Question	Your response
	harmful interactions with UGC disclosed by these participants here would be contradictory. It is acknowledged that realistically regulating for each individual user in a manner that takes into account each individual's circumstances, determinations, and factors that influence their determinations of harm is near impossible for a national piece of legislation. Exacerbating the national/local split already mentioned here. Therefore, clarity around the threshold and expansion beyond how U2Us can recognise this in practice in relation to UGC would be welcomed.
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – Y/ N When engaging in discussions around specific instances of content or recollections of examples of UGC that has the potential to harm, participants revealed three unique examples of UGC that could potentially pose a “risk of significant harm”. UGC depicting curb stomping and ‘Pinterest fights’ (as mentioned above), edited versions of the children’s TV character Peppa Pig, and videos depicting cats being harmed in blenders. These are all potential examples of PC UGC due to their depictions of “real or realistic serious violence against an animal” (Section 62(7)(a), “real or realistic serious injury of an animal in graphic detail” (Section 62(7)(a), and such being to both alive and fictional creatures/people/animals overall (Section 62(7)(c). However, the nature in which the participants encountered these and their reported concerns in relation to each are of note in terms of understanding to whom under the banner of “children” potential “significant harm” could be caused. Reports of interactions with UGC depicting curb stomping and fights described by participants as “Pinterest fights” were of note as UGC that has the potential to harm them as they see and interact with it. These fights and stomping videos were described by participants as depicting individuals not known to them (an inference in the absence of any confirmation that those present in the examples of UGC being reported in sessions were known to participants) being injured by having their “heads bashed into like bathroom sinks” and the use of weapons such as “baseball bats as well, just getting their

Question	Your response
	heads smashed in". The potential for Pinterest as a regulated service hosting such content (noted that this data and insight were collated prior to the full enactment of the 2023 Act's obligations by Ofcom) is concerning and significant. Firstly, at the time of data collection, these specific examples of UGC had not been seen in other data sets of reports or publications interrogating UGC that has the potential to harm children. Secondly, the user journey's participants took part in to find this content – as detailed above in relation to the services where children might encounter UGC that could harm them – by going via multiple platforms, raises questions as to the regulatory responsibility where cross-platform hosting or referral occurs in relation to UGC with the potential to cause harm. Whilst it is logical to conclude that post June 2025, all regulated services are under an obligation to take action to remove such UGC, clarity from the Ofcom as the online safety regulator as to the extent to which a caption on a U2U promoting a link to the eventually, clearly harmful and PC UGC, is tantamount to 'content likely to be harmful to children' would be welcomed. Edited versions of the popular children's character Peppa Pig were presented by participants as another example of UGC with the potential to harm them, accepted in analysis to be PC as demonstrated above. However, when this was raised by participants, comments centred around the unremarkable presentation of the UGC in the first instance and the concern they had, not for themselves, but for younger children, such as younger siblings, and the potential adverse impacts on them as a user group. Within the younger age ranges of participants (11-14) Peppa Pig was reported as being commonly accepted as being potentially harmful when such had been edited to appear as such. One participant described how, when they were younger, they were using a family iPad, of which their younger sibling would have access, when they were presented with a video of the character, which was deemed innocent at first instance. With the participant describing how it appeared as a video entitled "Peppa Pig goes to Disneyland" but when played, the video depicted "a clip of them driving into a slaughterhouse. And after they came back out and they were

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	just all chopped up into, like, different meats.” This was largely felt to be a non-typical situation for the character, which in the opinion of participants, had the potential to not only harm them, but also younger individuals as viewing users. To link to the above comments regarding the “appreciable number” threshold present in Section 60(2)(c) of the Act, it is significant that when categorising such as harmful, considerations of the particular users to whom this might be harmful extended beyond the specific participants being asked to others not present in sessions, such as younger siblings. Another participant, when reflecting on how this might impact younger viewers, said “ I think that’s, cause he’s so little, and obviously you don’t realise like my sister just thinks she’s watching Peppa Pig and it’s not. People edit it so. It’s like, really harmful.” This suggests that whilst the threshold has been put in place, determinations of harm, as suggested above, are much more nuanced and localised than the “appreciable” requirement indicates. It is acknowledged that this is not required for PC content, only NDC, but it is key to note in relation to the broader context of ensuring all children are safe online in line with the 2023 Act’s goals. It is also key to note here at this point of statutory reporting and considering the wider operation of the 2023 Act in protecting children, that the threshold of “significant harm” contained within Section 60(2)(c) is also, much like “appreciable number”, unclear. Finally, participants reported encountering UGC that depicted cats being placed into kitchen appliances, notably blenders and microwaves, and being injured. Across multiple groups, participants described these as UGC where the individuals within such had purposefully acted in a way to cause the animals injury. Again, participants raised concerns for the impact not only on themselves as individuals, but also on younger children, such as siblings. This specific example seemed to have more locality than the others mentioned, with participants suggesting that it had been seen by many of them due to such being shared around the school they all attended and they encountered such via direct sharing, similar to the Pinterest fights rather than unprompted like the Peppa Pig videos. The widespread acknowledgement and familiarity with

Question	Your response
	this specific example indicated that, even though participants potentially had different understandings and descriptions of “harm” than that used in regulations. When asked about specifically ‘harmful’ interactions, this was raised, suggesting that it was significant and more aligned with the terminology used in regulations, as this was seen as traditionally potentially harmful, rather than “weird” or “uncomfortable”.
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – Y / N

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