

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? – Y / N In 2024, FOSI published Promoting Wellbeing in a Digital World, a multinational report exploring the role of digital technology in adolescent wellbeing. This study utilized a mixed-methods approach involving qualitative focus groups of parents and adolescents from Brazil, Germany, and the United States, as well as a quantitative survey involving 1,000 participants from each country for a total of 3,000 responses. Across the three nations, roughly 9 in 10 adolescents indicated their online activity “always” or “often” results in a positive effect on mental, emotional, and/or social wellbeing. This is significantly higher than the proportion of young people reporting consistent negative experi-

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	ences online. The most common positive experiences were learning new information, feeling more connected to friends and family, being in a happier mood, feeling more relaxed, and discovering new hobbies or interests. Among parents and adolescents, the most commonly cited benefits include connecting with peers, learning new skills, enhanced academic learning, making new friends, and exploring niche interests. The greatest safety concerns among parents and adolescents were exposure to harmful strangers, online bullying, and online scams. Roughly 7% of parents and 18% of adolescents did not report concerns regarding children's wellbeing online. The most common negative experience cited by adolescents was the pressure to check notifications and responses. While users did report negative experiences related to online content, more than three-fourths of parents in each country identified media literacy to identify harmful content as a priority. While this concern was slightly lower among adolescents, in Germany, it was the top priority for young people. This evidence suggests that policy responses should seek to mitigate risks and expand digital literacy education without undermining the significant benefits young people derive from digital participation. These findings are broadly consistent with research from the United Kingdom showing that children's online experiences include both meaningful benefits and identifiable risks. Overall, evidence from FOSI's multinational wellbeing study suggests that while harmful content exists, adolescents report significantly more positive than negative experiences online.

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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
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – Y / 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:	
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 Evidence from our same study suggests that the most commonly reported physical harm associated with digital technology use relates to sleep quality. In the United States and Brazil, nearly half of parents and adolescents cited sleep health as negatively affected by digital technology use, while approximately one-third of German parents and adolescents reported a negative effect. Other than sleep quality, negative effects were reported at a significantly lower rate in comparison to positive effects.

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	Among psychological harms, approximately 20% of parents and adolescents reported a negative impact on emotional health resulting from digital technology use. Body image was also negatively affected, with approximately 14% of parents and 11% of adolescents reporting negative impacts as a result of digital technology use. These findings suggest that while digital technology use can contribute to certain physical and psychological harms, these effects are often related to patterns of use rather than exposure to harmful content. In particular, the negative effects on sleep health signal the importance of considering broader digital habits, such as nighttime device use and notification management. The most significant tie to harmful content involves negative effects on body image among some adolescents. The relationship between digital technology and body image highlights the need for continued attention to appearance-based pressures online. Considered together, these findings underscore the importance of responses that address harmful content while also supporting healthy digital habits among young users.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – Y / 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? – Y / N

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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? – Y / N
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – Y / N Our data supports maintaining eating disorder content as primary priority content (PPC) and body stigma content as at least non-designated content (NDC), with the potential to shift to priority content (PC). As previously discussed, some parents and adolescents report negative effects on body image as a result of technology use. Continuing to focus on eating disorder content as a primary priority, while giving careful consideration to body stigma content, can help combat appearance-based pressures affecting young people online.
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:	

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Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – Y / N Given increasing use of generative artificial intelligence (GenAI) content among young people, PPC, PC, and NDC areas must be prepared for the impact of GenAI. FOSI's 2025 report <i>Generative AI in Uncertain Times: How Teens are Navigating a New Digital Frontier</i> found nearly half of adolescent GenAI users use these tools at least once a week. GenAI is capable of producing content in all currently designated PPC areas (pornographic content, self-injury content, suicidal content, and eating disorder content). Worryingly, these platforms have been used to create nonconsensual “deepfake” content including non-consensual intimate images (NCII). It is critical Ofcom continues to be vigilant and agile in this area and includes AI-generated harmful content in its risk considerations and mitigations. Summary In summary, FOSI's research finds that while young people encounter harmful content online, their experiences are predominantly positive. Online communities provide meaningful opportunities for social interaction, learning, and creativity for young people. Areas of concern include impacts on sleep, body image, and emotional health, signalling the need for a balanced approach to youth online safety. Ofcom should continue to target harmful content while also focusing on digital literacy education for adolescents and parents alike. Emerging technologies including artificial intelligence continue to shape our online landscape and the digital experiences of young people. It is essential to ensure existing procedures and programs include some artificially generated

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	content, such as artificially generated nonconsensual intimate images (NCII), within the scope of harmful content. FOSI welcomes the opportunity to continue working with Ofcom to address growing online safety concerns.
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – Y / N
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – Y / N

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.