

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:

Our Youth, Race and Social Media research project (funded by Meta) explored the experiences of black and racially minoritised (BRM) young people aged 16-25 on social media in the UK. The research focused on their experiences of engagement with content related to race and racism. We had 809 responses to our primarily quantitative survey (including over 400 free text responses to open questions). We also engaged 110 young people around the UK in qualitative focus groups and interviews.

Of the young people who took part in the survey, 49% identified as black, 43% as Asian and 8% as from other racially minoritized backgrounds. The survey received more responses from young people at the lower end of the 16-24 years age range than from young people in their twenties. 19% of respondents were 16 years of age, 12% were 17, 16% were 18, 13% were 19, 12% were 20, 9% were 21, 8% were 22, 5% were 23 and 6% were 24. As such, 60% were aged 16-19 and 40% were aged 20-24.

The vast majority of survey participants were from England, despite paid promotions on social media to specifically target young people from the other UK nations. In total, 94% of survey respondents were from England and 37% of overall respondents were from London specifically. This means that the survey findings primarily reflect the experiences of BRM young people living in England.

The survey received significantly more responses from young people who identified as female than other gender identities, despite targeted paid promotions to attempt to rebalance this. 68% of respondents were female, 20% were male, 9% were non-binary, 2% stated 'other' and fewer than 1% preferred not to say.

The focus groups took place in West Norwood (London), Tottenham (London), Warwick (West Midlands of England), Newcastle (Northern England), Edinburgh (Scotland), Cardiff (Wales) and Belfast (Northern Ireland). This covered a range of both racially diverse locations and those that were relatively less diverse.

85 of the young people who took part in focus groups and interviews came from African or African-Caribbean heritage backgrounds (including mixed heritage) and 22 were from South Asian heritage backgrounds with a further 3 from South-East Asian heritage backgrounds. 63 were young women and 47 were young men.

The full research report can be accessed here: <https://research.gold.ac.uk/id/eprint/38765/>

Question	Your response
	A further paper analysing the open text responses to the survey can be found here: https://research.gold.ac.uk/id/eprint/40090/ We have responded to the specific questions below based on the findings of this study.
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 The content discussed in our research comes under the PC category – as it is content that relates to issues of racism and hate speech. Almost all the black and racially minoritised young people (95%) surveyed said they encounter racial content that is violent or abusive on social media. More than half (56%) of them saw this racist content at least once a week. For 16% of young people, it was a daily occurrence. The most common form that this abusive or violent content took was racist comments on other's posts (73%). 62% said this content also took the form of videos and images of racial violence. 30% said it took the form of racist private messages, indicating a relatively high level of targeted abuse on social media, though it is not clear whether these messages come from strangers or people they know offline. 13% said it also took the form of comments on their own posts, which arguably reflects a high level of backlash given that only 5% indicated that they commonly create their own posts on the topic of race. The videos and images of racial violence that young people encountered frequently led to a sense of overwhelm and over-saturation of violence and this was discussed in-depth in focus groups. Video content was a mix of factual content (e.g. recorded footage of public harassment of black people or police brutality towards them) alongside fictional content that also caused the young people distress (one example discussed at length was a video that circulated that was a racialised version of Cinderella depicting abuse of a racially minoritised Cinderella character).
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 data in our study relates to black and racially minoritised (BRM) young people's experiences of PC and particularly women who were the majority of our survey respondents. The focus on racially minoritised young peo-

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	ple was to address a lack of attention to their specific experiences in UK research and policy relating to social media and online experiences to date. The specific forms of abuse experienced by black women emerged in our qualitative data where hyper-scrutiny, hyper-sexualisation, cultural appropriation and specific insults relating to the physical appearance of black women emerged as themes. Black young women felt particularly exploited as well as them feeling they faced more scrutiny for their physical appearance on social media than white women. Criticism and comments relating to physical appearance were prevalent as well as gender-specific insults. <i>People try to be as offensive as possible. I think they use a lot of descriptors for that. So, where it might be, "You [REDACTED]," for example, I think that for me seems gender focussed. It's just not something you would say to a man... But the majority of hate online is targeted towards women. (Warwick focus group)</i> As well as targeted directly at the young people themselves, the young women in the study recounted examples of the impacts of such scrutiny towards celebrities - for example, a discussion in Tottenham focused on the reality TV show, Love Island. <i>In relation to Love Island, 'India', I've seen a lot of TikTok videos trying to prove that she's good looking because it seems like if a black woman takes a picture and there's maybe one imperfection that makes her ugly, completely, no matter what... so I feel like that just encourages a need for us to be perfect, in a sense. (Tottenham focus group)</i> This prompted a discussion in the focus group on how comments on physical appearance were often linked to the hyper-sexualisation of BRM women. They identified the consequences for mental and physical health, including the impact on the development of a healthy sexual self-image, especially for younger BRM girls watching the programme who identify with similar physical appearance traits as 'India', implying a person's value comes only from her sexual appeal or sexual behaviour to the exclusion of other characteristics. The group were concerned about how young girls appropriate and interpret the hyper-sexualised messages transmitted on social media platforms about the show and female black contestants and how

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	this might impact how young BRM female viewers see themselves and are seen by others. One young person in the same focus group shared the backlash she received when posting photos of herself in her Mass/Carnival Costume which she wears as part of celebrating the country she was born, Antigua. <i>People do hypersexualise when they see you in your mass costumes on social media, they feel like they can sexualise you through the image because I guess kind of it was a form of emancipation. But they feel like they can belittle you, not only racial slurs but like you're a prostitute and stuff like that, based on something that you're culturally connected to. (Tottenham focus group)</i> The body shape of black women and photos they posted on social media were routinely sexualised. This caused black women to overthink what to post to avoid backlash. <i>Yes, we've got the big boobs, the big batty [bum], the big lips, the big nose, and I guess people think that, say I post a picture in a sundress and I turn in a slight way, it's something like "she's trying to show us her arse – she's trying to show us her bum", sexualising us. Then, certain pictures, do I post this or do I not post it, because if I post it I don't want people to be on "she's posting it to get my attention", it's not my fault if I have a big batty... social media has a way of making you question everything you believe and everything you know that is right... (Tottenham focus group)</i> As such, the body shaming imposed on black women impacted what young BRM women shared on social media. Within the focus groups, BRM women drew attention to the increased scrutiny and abuse they felt they were subject to for being both women and from BRM communities, beyond simply their physical appearance. <i>So, when you're looking at racial hate as well, obviously when you're a Black woman you're just – you're undoubtedly going to get more. Before I was an influencer, still obviously not as much, but I still had an insane amount of sexist or racist hate online, which is quite odd. But again, I put that down to the fact that I'm a woman that exists online that isn't white... it might be a comment here and there and someone calling me a [REDACTED] or telling me to [REDACTED] on a [REDACTED]. (Interview with Influencer, London)</i>

Question	Your response
	The young women felt they experienced more abuse on social media platforms, when they had an active presence or posted regularly, than they observed white women experiencing. The interacting effect of racism and sexism led to augmented forms of inequality.
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – N We did not seek to compare platforms at the request of the funder but to look at experiences of social media broadly. The survey participants identified the platforms they use most often. This data was skewed by the fact that we did most of the recruitment for the survey via paid promotion on Instagram – but it gives an overall sense of the social media platforms that the participants were regularly using. • 97% of participants stated that they use Instagram • 75% of participants stated that they use YouTube • 68% of participants stated that they use TikTok • 63% of participants stated that they use Snapchat • 63% of participants stated that they use WhatsApp • 37% of participants stated that they use Pinterest • 22% of participants stated that they use Reddit • 20% of participants stated that they use Facebook • 14% of participants stated that they use LinkedIn • 9% of participants stated that they use Tumblr • 4% of participants stated that they use other online social networks Video and image sharing sites were popular and emerged within focus groups as a key site for abuse. This abuse manifested in the videos and images themselves where factual or fictional accounts of racialised abuse were prominent – as well as in the comments on such videos and images, including racist backlash on what were perceived to be originally well-meaning posts to raise awareness of racism. This prominence of racialised abuse shared through videos and images and the impact on participants has clear implications for the need for regulation of the increasing AI-created content that is developed to shock, cause a reaction and spread on social media - as such content that

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	has a wide reach is monetised and profitable for content creators. The increasing availability of generative AI tools also raises new risks for children and young people. AI-generated images or videos that depict racialised violence, harassment or humiliation can be produced and circulated at scale, often without clear provenance. Such content may blur the boundary between fictional and real events, amplifying emotional distress and making it harder for young users to interpret authenticity. Ofcom may therefore wish to consider how AI-generated abusive or violent racialised content should be addressed within existing regulatory categories.
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? – N Young people in focus groups raised that the immediate impacts of exposure to racialised and racist content on social media on their wellbeing include a sense of overwhelm (sometimes followed by desensitisation) as well as attempts to disengage from social media (usually temporarily) and sometimes to subvert algorithms through both avoiding content they don't want to see more of and clicking on mundane content they were not interested in, in an attempt to re-curate their feeds. They reported that trying to change the algorithm (even through platform-

Question	Your response
	provided means to do so) often felt futile and that profitability was more important to algorithms than their well-being. They overall felt a lack of user control and agency in curating their feeds. Disengagement from interacting with issues of race and racism at all was common as young people discussed that even a comment on another person's awareness-raising post led to both substantial racist backlash and then the algorithms sending significantly more racist content their way. Only 5% of survey respondents said they create their own content around issues of race and young people in focus groups indicated that they avoid engaging with that of others due to their prior negative experiences of doing so. This leads to their underrepresentation in these spaces. However, for some young people, there was a sense of enforced representation where they felt they needed (often reluctantly) to offer a positive representation of their community or identity to counter the prolific negative content that circulates widely about them. In terms of negative impact on their offline lives, young people in the survey and focus groups identified that primary impacts were on their mental health, relationships with authority and feelings of (un)safety. In the survey, 'feeling safe' emerged as the area in which young people experienced the most negative impact on their offline lives, with 58% of participants stating a negative impact in this area. This is followed by 'relationships with authority (e.g. teachers, police, managers)' where 52% of participants reported a negative impact. This suggests the frequently observed videos and images of violence against racialised groups, including by both the general public and police, may be leading to a sense of being unsafe in public and a lack of trust in those who should protect them. In focus groups, there was also a feeling amongst young people that the encouragement of escalating violence and hatred online towards BRM individuals and communities resulted in feeling insecure or unsafe in offline environments. This was particularly pertinent in the Cardiff focus group where the young people discussed being a visible minority in their local area. <i>You see a lot of racism, mostly towards your skin colour, black people. Bullying, you can be bullied for anything, maybe people don't like your weight because of your skin colour, they don't like your</i>

Question	Your response
	<i>hair because of your skin colour -they make you feel like you're not one of them and you feel suicidal. You feel alone and isolated when you're out in certain places, you get reminded of all this hate, walking home late at night or in places where there is no black community. (Cardiff focus group)</i> A young black Muslim woman in the same focus group shared how what she experienced online led to a feeling of being hated and cautious in wider contexts. <i>I take with me everywhere the feeling that I am hated, and it makes me sad, hurt and shameful and I am fearful because it's not the societal norm to be black and a Muslim being everything that society dislikes. How do you move around freely when you feel like this? (Cardiff focus group)</i> The continual experience of seeing racist abuse online was clearly linked to feeling targeted and unsafe in wider contexts for many young people. This was linked to seeing a proliferation of videos and images of abuse against others or seeing others targeted with racist abuse online. For some young people, experiences of being the direct target for online abuse impacted their sense of safety more widely. The young woman interviewed in London who was a social media influencer was particularly conscious of her own safety and had taken measures to protect herself. <i>I don't post where I am in real time. I don't ever post places that I go frequently. Nothing is up to date with my social media. People know that I'm studying, but they don't know where I'm studying... I suppose that level of cautiousness does come from being online and using online platforms. I think the hate that I receive online, if there was the possibility that people could do that in person, maybe they would. It's not a risk I'm willing to take. (Interview with Influencer, London)</i> Despite these measures, she shared the ongoing anxiety and vigilance she felt in day-to-day life. <i>It makes me feel unsafe in real life. I think I get recognised in public a fair amount, or people will stare at me and there's always, "Why are you looking at me? So, yes, there's definitely that impact. Of course, people know who I am, but I don't know who they are, especially when it's a fake account. I don't know who this is. It could be absolutely anyone, so that's obviously a difficulty... I</i>

Question	Your response
	<i>think when you're receiving a lot of online abuse, your first point of call is, "OK, well, it must be someone like this because they want to cause harm." When you're receiving, I guess, racist abuse online your first point of call is obviously to tie those in together. It's the same way, if anyone for whatever reason threw a brick in my window or my car or any of those things, I would – my first point of call would be like, "OK, it's someone that's messaging me abuse online."</i> (Interview with Influencer, London) The impact of racist online abuse, particularly by anonymous trolls, was also felt in a similar way by young people who did not define themselves as influencers. <i>There is an element of reduced psychological safety I think when you're being targeted online, and you don't know the identity. You're not going to know if that's someone in your personal life, if that someone knows you, knows where you live, the spots that you frequent. So, there is that anxiety I think that comes with any kind of online abuse, but especially racial abuse. You just have to look at discourse in the media of where that goes. We're seeing a lot of black women that go missing, they get attacked.</i> (Warwick focus group) Online videos of police brutality caused young people to reflect on their sense of safety and security with people in authority. In the Cardiff focus group, young people discussed this in relation to relationships with both their teachers and the police. <i>I'm not sure, like, how it's turned into this, but personally I wouldn't feel safe handling my issues with the police. I feel like it's really biased nowadays, as in like they don't pay attention to what I'm trying to say unless something big has happened. It's like the George Floyd thing, no one paid attention until like loads of other people from all around the world had to jump in. That's only when justice was, kind of, given.</i> (Cardiff focus group) <i>So, I think feeling safe with like teachers or police or stuff like that, it really needs to be improved because it's not the best right now.</i> (Cardiff focus group) This demonstrates how feeling unsafe and relationships with authority are linked.

Question	Your response
	Young people reported that traumatic experiences of racism in relation to the police are circulated freely on social media, often reinforcing messages that the police misuse their authority when engaging with BRM communities. Young people often initially experienced this as a positive thing to raise awareness. However, the impact of seeing it repeatedly impacted on young people's wellbeing, their feelings towards the police, and they experienced people commenting in support of the violence and brutality. <i>I thought the police were supposed to protect people and they didn't do that, and this was not being noticed - instead it was posts that I'd see that, "he should have listened". That's not how it was. (Cardiff focus group)</i> The Cardiff group expressed particularly how their experiences on social media reinforced their sense of being stereotyped and seen as a problem because of their racial backgrounds. <i>They're supposed to be protecting people, but they just stereotype us.....troublesome, guns and violence and a threat... and so we don't get protected. (Cardiff focus group)</i> <i>I saw this video on TikTok recently and there was like police, it was in the UK, and they handcuffed three black people and they said, "They're just causing trouble," when they didn't have proof it was them. People were with them who said it wasn't them, it was like his neighbour, and it was actually the wrong people they'd got. But they handcuffed one of the boys and his hands were like bleeding. (Cardiff focus group)</i> In other focus groups, young people reported that what they saw on social media made them wary about how far they could trust police to protect them. <i>I think the fact that it's more widespread on social media now means that even if you haven't experienced it yourself, you as a black person might have a negative view of the police which a lot of people do, but a lot of people might disagree. But again, social media shares these videos using these instances of things happening and it causes you to think that you are not being protected by the people that you're supposed to be protected by. (Newcastle focus group)</i>

Question	Your response
	A substantial negative impact was also reported in relation to 'mental wellbeing' where 42% of survey participants reported an overall negative impact. There is, however, some nuance and complexity that emerges here in relation to the impact of racial content on social media on mental wellbeing, with 40% of young people in our study reporting that there is 'a mix of positive and negative impacts that balances out overall' in this area (although only 7% reported an overall positive impact). Concerns over mental health and wellbeing featured across the focus groups. Young people described feeling angry and sad at the racialised content they saw online and coped with it by ignoring it, 'scrolling past' and moving on, despite truly 'moving on' being often difficult for many to manage. They spoke of grief, feeling detached and hopeless in the face of the enduring images and commentary on the injustices facing BRM people. Young people shared their thoughts on how they had managed their wellbeing, through avoidance of or interactions with racial content on social media. <i>My interactions with posts about race and racism on social media have become defined through those events that have taken place, which have obviously massively impacted my mental health. So, I don't actually interact with material anymore, the most I'll do is I'll send it to someone I know so that we can discuss it, and that's really it.</i> (West Norwood focus group) Young people recognised that the impacts on mental health were mixed, at times positive but often negative. The negative impacts outweighed the positive for many young people overall, as in the example below. <i>So, you being on social media and saying the things you're saying, it's all well and good, but I know for me, for myself, it's just a way to just protect myself. I don't want to deal with racial abuse, I don't want to deal with just any – like, social media is good and bad, but for me, the bad outweighs the good, whether it's race and just feeling [redacted], or just mentally speaking, it's just not a healthy place.</i> (Individual interview, London) This reflects the nuance also uncovered in the survey as to whether the impact on mental health is positive or negative, overall. As can be seen above, much of the harm young people experience was driven by the prolific sharing of videos of

Question	Your response
	racialised violence. There is a complexity that emerges here in whether the harm is caused by social media or the public acts captured in the videos themselves. This complexity is also reflected in their being a mix of fact and fiction in violent video and image content on social media. Ofcom might want to consider whether children and young people's exposure to violent images and videos needs to be further restricted and/or more closely regulated on social media, given these harms. They might also consider how fictional (and AI-generated) violent content might be further restricted more broadly.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – N We cannot confirm causal links but there are clear implications in our study about the impacts of racism on social media on black and racially minoritised young people, as outlined above.
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 Our data as outlined above is specific to the experiences of black and racially minoritised young people of racialised content on social media, particularly women who were the majority of our research participants. The focus on racially minoritised young people was to address a lack of attention to their specific experiences in UK research and policy relating to social media and online experiences to date. We have shared data above that is specific to the experiences of black women that indicates how race and gender intersect and suggests that the impacts may also be greater for this group.
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	

Question	Your response
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 NA
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – Y / N NA
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – N Based on the data we have provided, Ofcom may want to consider whether racialised abuse should be upgraded from PC to PPC. Given the high prevalence of exposure (95%) and the documented impacts on mental health, perceptions of safety, and trust in authority, racialised abuse on social media may meet the threshold for designation as Priority Primary Content (PPC) under the Act. Such a designation would better reflect the cumulative harms experienced by affected children and young people. The evidence from this study suggests that repeated exposure to racialised abuse online constitutes a systemic harm rather than isolated incidents of offensive content. As such, stronger categorisation within the regulatory framework may better support platform accountability and child safety protections.
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 As outlined above, 95% of the black and racially minoritised young people we surveyed encountered racially abusive content on social media. 72% said they see it regularly, at least once per week.

Question	Your response
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – N As demonstrated above, 58% of the black and racially minoritised young people we surveyed experienced an overall negative impact on their feelings of safety in their wider lives, 52% on their relationships with authority and 42% on their mental health. These are arguably significant harms.
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – Y / N NA

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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