

Introduction

Internet Matters welcomes the opportunity to respond to Ofcom's call for evidence on content harmful to children.

In this submission, we draw on *Internet Matters Pulse* and wider research to highlight patterns in children's exposure to harmful content online, including the types of harm children encounter, the groups of children most likely to experience them, and the online environments in which these risks arise. Our evidence shows that children continue to encounter a range of harmful content online and that certain groups, particularly vulnerable children, may face higher exposure to some forms of harm.

The findings also suggest that some harms frequently experienced by children - including content promoting unrealistic body images or altered bodies and misinformation - may warrant further consideration within Ofcom's framework for categorising content harmful to children. Finally, the submission emphasises that significantly reducing children's exposure to harmful content requires robust enforcement of the Online Safety Act, alongside ensuring that emerging technologies - including the conversational AI services increasingly used by children - are effectively addressed within the regulatory framework.

Methodology

This submission draws on evidence from *Internet Matters Pulse*, a bi-annual nationally representative survey of 1,000 UK children aged 9-17 and 2,000 UK parents of children aged 3-17. The findings below draw on data from Wave 21 (May-June 2025) and Wave 22 (October-November 2025), supplemented by additional research conducted by Internet Matters. Internet Matters has set up a data sharing Memorandum of Understanding (MoU) with Ofcom and this data from these and other waves will be shared in coming months.

Wave 21 was conducted prior to the Protection of Children Codes of Practice (POC Codes) under the Online Safety Act taking effect, while Wave 22 was conducted afterwards. These waves provide an early snapshot of children's reported exposure to harmful content before and shortly after the regulatory framework came into force.

For the purposes of this submission, the harms tracked in Pulse have been mapped, as closely as possible, to the categories of Primary Priority Content (PPC), Priority Content (PC), and Non-Designated Content (NDC) defined in the Act. The table below sets out how the harms tracked in Pulse correspond to these categories.

Harmful content category	Harm tracked in Pulse
Primary Priority Content (PPC)	Came across pornographic content* Came across content promoting self-harm* Came across content promoting suicide* Content which promotes dangerous eating habits*
Priority Content (PC)	Came across violent content, or content that promotes violence Came across content featuring violent animal abuse Online bullying, abuse or trolling from people I know

	Online bullying, trolling or abuse from people I don't know Came across content which promotes dangerous stunts and challenges Came across hate speech Sexual abuse or harassment from other children online* Came across content from radical or extremist groups
Non-Designated Content (NDC)	Came across content promoting unrealistic body images or altered bodies

In the table, an asterisk (*) indicates harms that are not asked to children below 13 due to safeguarding reasons. This means that findings relating to these harms, particularly PPC, reflect the experiences of children aged 13-17 rather than the full sample of children aged 9-17.

In some cases, the harms tracked in the survey may overlap with the Act's illegal content categories. For example, exposure to content from radical or extremist groups may constitute illegal content in some contexts depending on severity and nature of the material, but may also be considered as PC. As such, this mapping is intended to reflect how the harms tracked in our survey relate to the categories set out in the Act, rather than to provide a definitive legal classification of each harm.

Please note that not all data reported shows statistically significant differences. We have included some findings without statistical significance where they are relevant to the parameters of the call for evidence and have highlighted statistically significant differences where possible.

Part 1: The incidence of content that is harmful to children on regulated services. 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.

The data discussed in Part 1 is based on children's self-reported experiences of encountering different types of harms online.

Overall, our findings show that children continue to encounter a range of harmful content online even after the POC Codes having come into force. Children's overall exposure to PPC, PC and NDC has been relatively stable across Waves 21 and Wave 22, with no statistically significant differences observed.

Figure 1: Children's overall exposure to PPC, PC and NDC - combined percentages



Figure 1. Children's overall exposure to PPC, PC and NDC – combined percentages.

*PPC only asked to children 13+. Base: Children aged 13-17 – 606 (Wave 21); 574 (Wave 22)

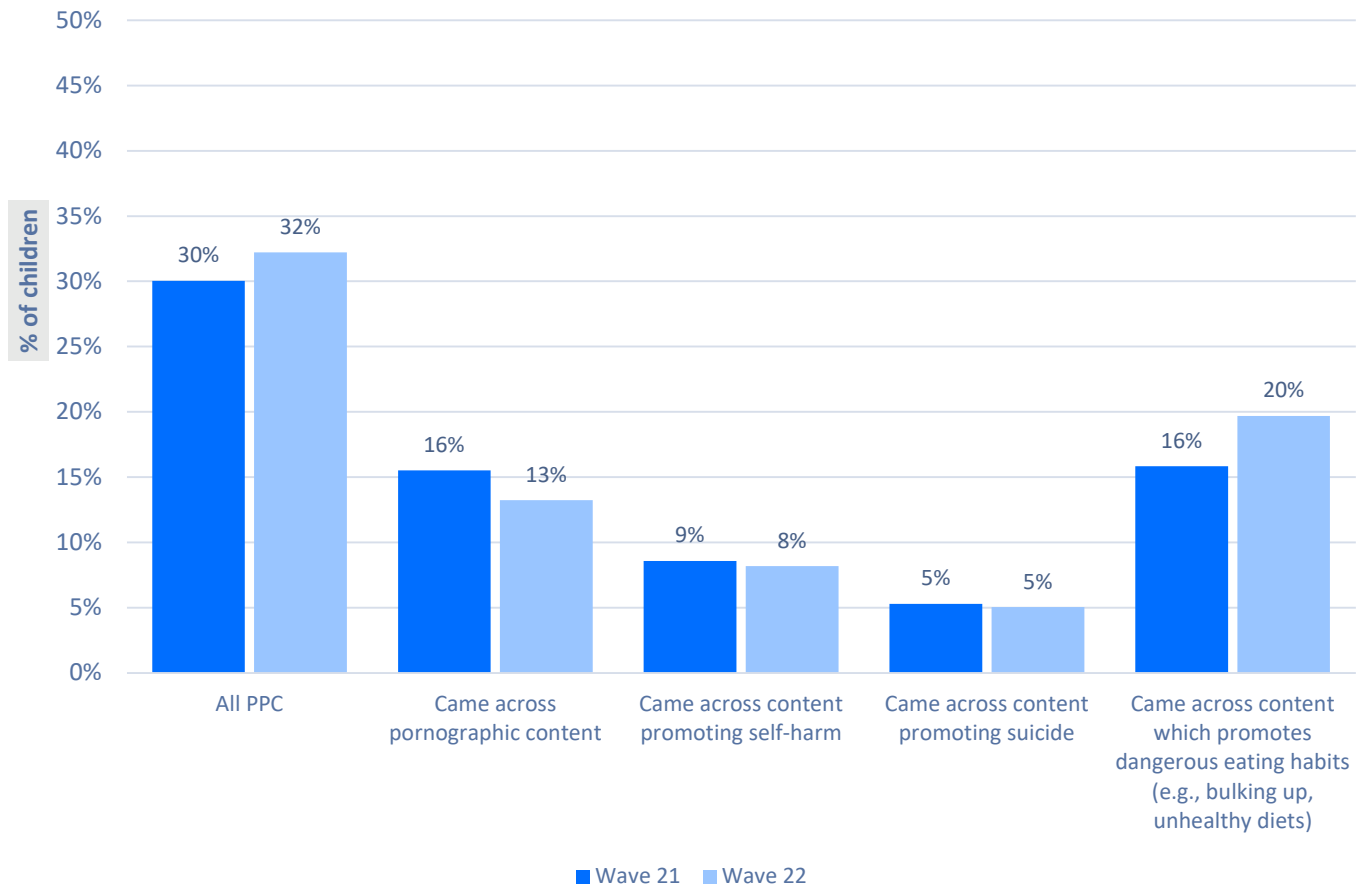
**PC figure excluded sexual harassment, as this was only asked to children 13+. For full breakdown of PC, see Figure 3. Base: All children – 1000 (Wave 21; Wave 22)

The chart above shows the proportion of children who reported encountering at least one type of harmful content within each category. In Wave 22:

- 32% of children aged 13-17 reported encountering at least one form of PPC, compared with 30% in Wave 21.
- Nearly half of children reported encountering at least one type of PC, with 48% in Wave 22 compared with 49% in Wave 21.
- 18% of children reported encountering content promoting unrealistic body images or altered bodies (the only NDC we track) in Wave 22 compared with 19% in Wave 21, indicating that nearly one in five children continue to report exposure to such content.

These findings suggest that children's reported exposure to harmful content has remained broadly consistent across the two waves of data collection. **While this analysis provides only an early snapshot following the introduction of the POC Codes, it indicates that a substantial proportion of children continue to report encountering harmful content online.**

Figure 2: Children's exposure to PPC - breakdown

*Figure 2: Children's exposure to PPC – breakdown.**Base: Children aged 13-17 – 606 (Wave 21); 574 (Wave 22)*

Across individual categories of PPC tracked in *Pulse*, children's reported exposure has remained broadly stable between Wave 21 and Wave 22. Exposure to content promoting self-harm (9% in Wave 21 cf. 8% in Wave 22) and suicide (5% in both waves) remain unchanged. We have seen a slight decrease in children coming across pornographic content (16% in Wave 21 cf. 13% in Wave 22) but also a slight uptick in those coming across content promoting dangerous eating habits (16% cf. 20%).

Overall, these small changes do not indicate any meaningful shift in exposure, suggesting that children's experiences of primary priority content have remained largely consistent over the two waves.

Figure 3: Children's exposure to PC - breakdown

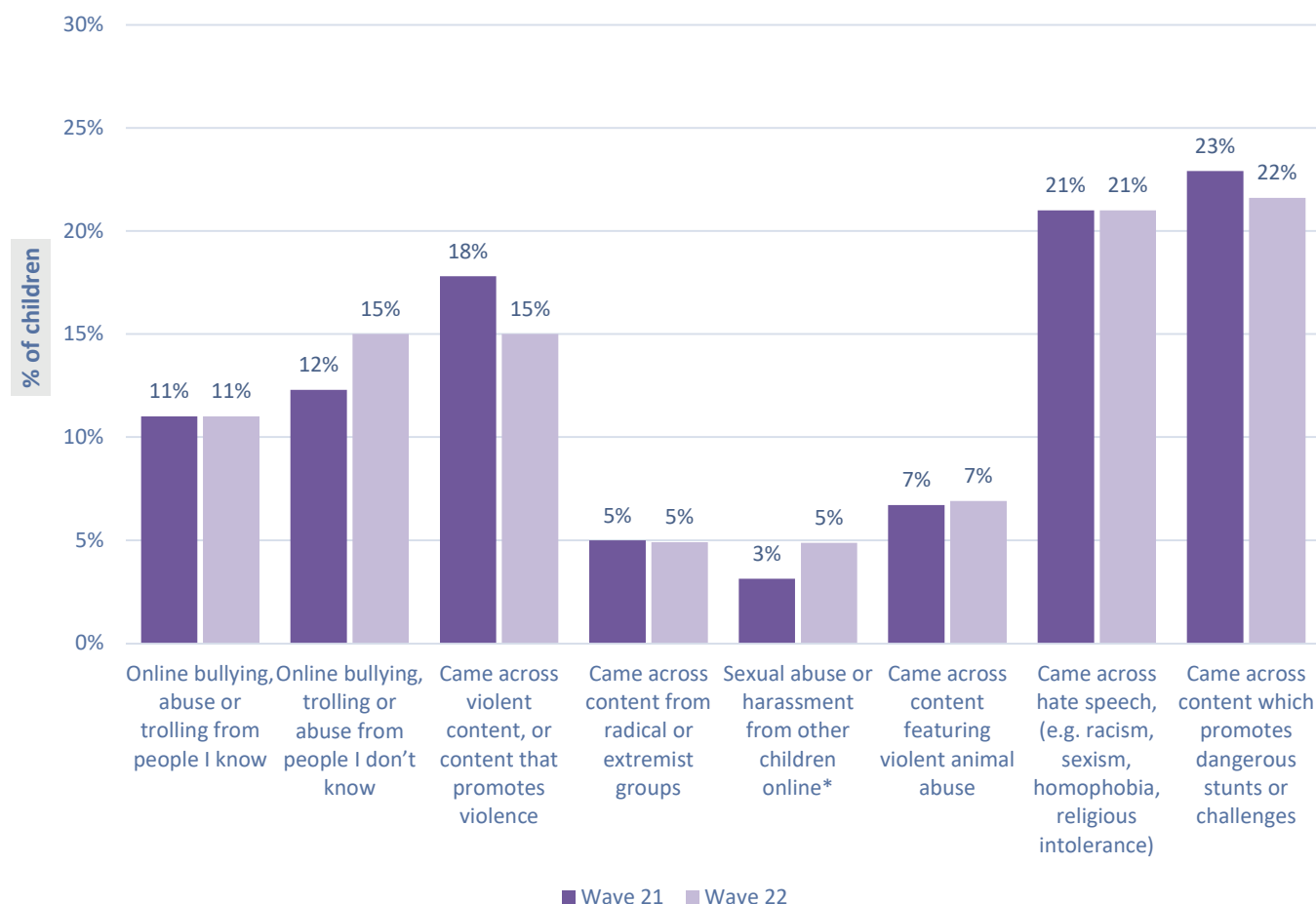


Figure 3: Children's exposure to PC - breakdown

Base: All children – 1000 (Wave 21; Wave 22)

*Sexual abuse or harassment was only asked to children 13+ and so figures are adjusted based on this. Base: Children aged 13-17 – 606 (Wave 21); 574 (Wave 22)

Several specific types of PC were encountered by a notable proportion of children. Content which promotes dangerous stunts and challenges was among the most commonly reported, with 22% of children reporting exposure in Wave 22, and 23% in Wave 21. Similarly, 21% of children reported encountering hate speech in both waves.

When considered at population scale, this suggests that a substantial number of children may encounter these harms online. For example, based on population estimates¹, this equates to approximately 1.58 million children aged 9-17 in the UK encountering hate speech online.²

These findings indicate that children encounter harmful content across all categories. The following sections examine how exposure to harmful content varies across different demographic groups.

¹ The Office of National Statistics' June 2024 mid-year report estimates the population of children 9-17 in the UK to be 7,519,478.

² Office for National Statistics (ONS), *Provisional population estimates: mid-2024*. [Link](#)

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.

Exposure by vulnerability

Children with vulnerabilities are more likely to experience certain types of harm online than children without these vulnerabilities. We refer to children who have an Education, Health and Care Plan (EHCP), who receive special educational needs (SEN) support, or who have a physical/mental health condition which requires professional help as vulnerable.

Figure 4: Children's exposure to PPC - vulnerable children

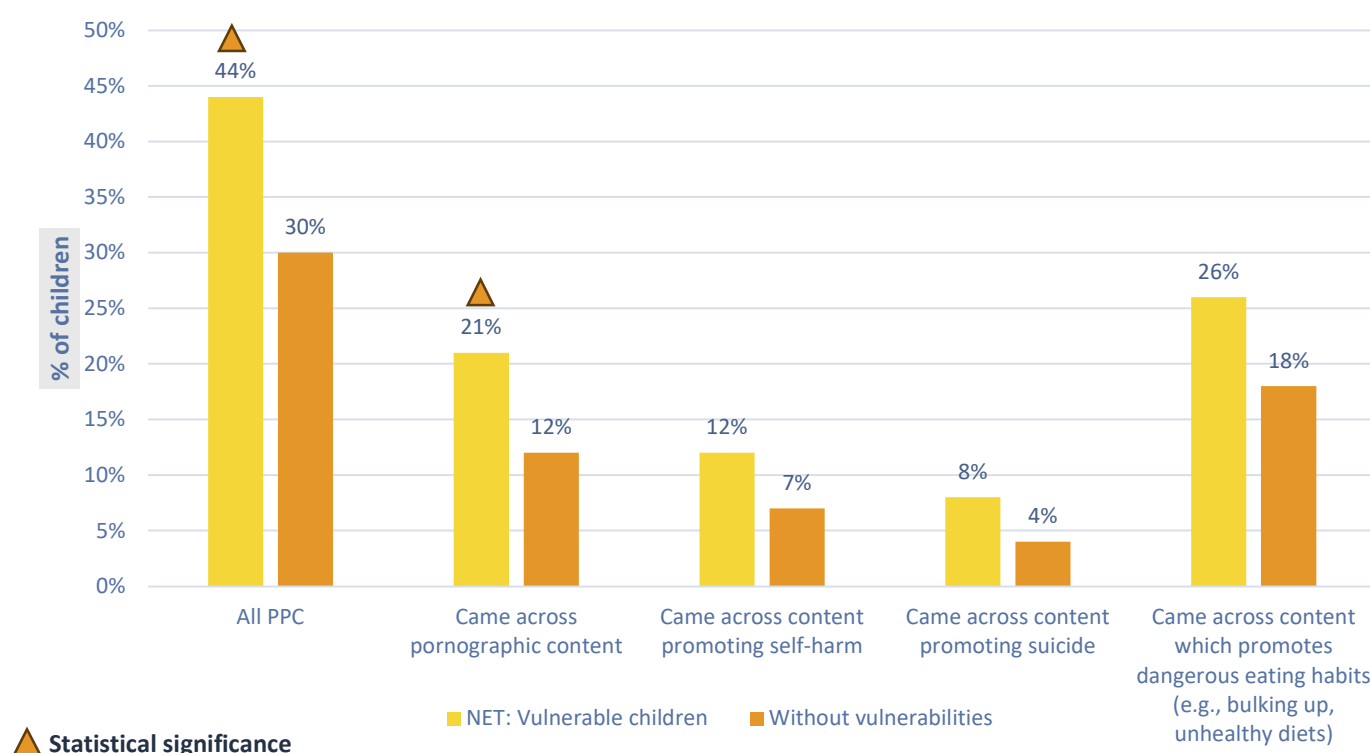


Figure 4: Children's exposure to PPC – vulnerable children compared to children without vulnerabilities.

Base: Wave 22 dataset - Vulnerable children aged 13-17 (99); Children without vulnerabilities (474)

Vulnerable children are statistically more likely to encounter PPC compared to those without these vulnerabilities (44% cf. 30%). In particular, vulnerable children are significantly more likely to come across pornographic content (21% cf. 12%). Other harms, such as self-harm, suicide and content which promotes dangerous eating habits, show small differences too although they are not at the statistically significant level. Therefore, considering the experiences of vulnerable children is important if we want to improve outcomes for all children.

Figure 5: Children's exposure to PC and NDC - vulnerable children

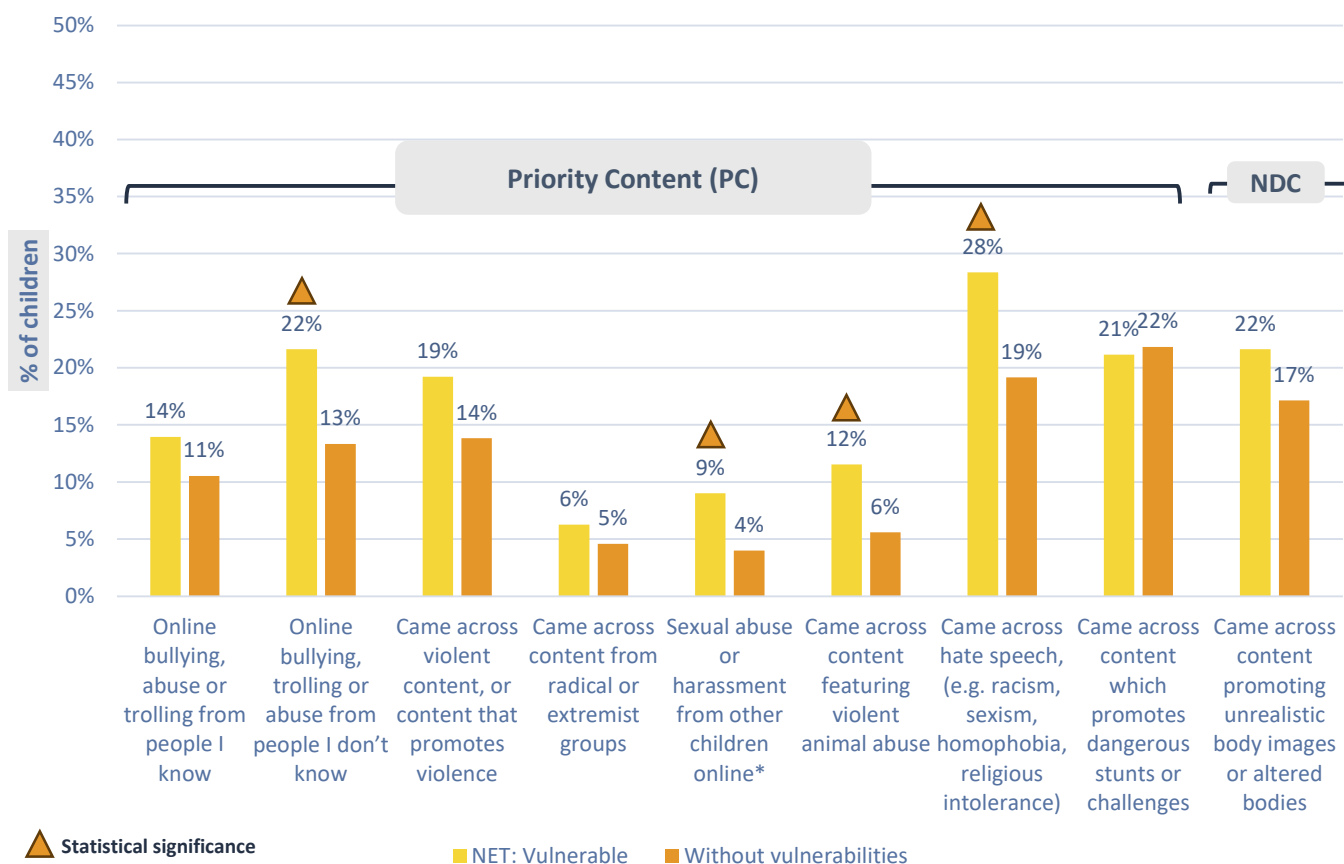


Figure 5: Children's exposure to PC and NDC – vulnerable children compared to without vulnerabilities

Base: Wave 22 dataset - Vulnerable children (208); Children without vulnerabilities (788)

*Sexual abuse or harassment was only asked to children 13+ and so figures are adjusted based on this. Base: Vulnerable children aged 13-17 (99); Children without vulnerabilities (474)

Vulnerable children are also significantly more likely to report exposure to PC. Overall, 54% of vulnerable children reported encountering at least one type of PC, compared with 46% of children without vulnerabilities.³

Several individual harms also show statistically significant differences: 22% of vulnerable children reported experiencing online bullying, trolling or abuse from people they do not know, compared with 13% of children without vulnerabilities. Vulnerable children were also more likely to report encountering hate speech (28% compared with 19%) and violent animal abuse (12% compared with 6%). Vulnerable children aged 13-17 also are more likely to say they have experienced sexual abuse or harassment from other children online (9% cf. 4%).

Internet Matters Pulse also tracks whether children report being contacted online by someone they do not know. In Wave 22, 31% of vulnerable children reported being contacted by a stranger online, compared with 23% of children without vulnerabilities, representing a statistically significant difference.

³ This figure excludes 'Sexual abuse or harassment' as this form of PC was only asked to children 13+.

Contact from strangers can increase children's exposure to potentially harmful interactions online, including abusive or unwanted communication. In this context, Internet Matters welcomes Ofcom's March 2026 statement requiring platforms to introduce stronger safeguards to prevent unknown adults contacting children online, as this measure has the potential to address an important source of online risk for vulnerable children.⁴

Vulnerable children also reported higher exposure to content promoting unrealistic body images or altered bodies, a form of NDC, with 22% reporting exposure compared with 17% of children without vulnerabilities, although this difference is not statistically significant.

These findings indicate that children with vulnerabilities face a higher likelihood of encountering several forms of harmful content online and online risk, particularly within the PC category.

This mirrors broader findings from Internet Matters' research that vulnerable children experience both the best and worst aspects of online life compared to their peers.⁵ This means that exposure to harmful content may have a more pronounced impact for these children, compounding existing vulnerabilities and increasing their overall risk of harm. To meaningfully reduce online harm, it is therefore essential that we reduce the harm experienced by those children with additional needs.

Exposure by age

The analysis below combines evidence from children's self-reported experiences (for ages 9-17) with parent-reported experiences for younger children (for children aged 3-12). Children's self-reported data has been grouped into the following age categories: 9-12, 13-15 and 16-17. Parent-reported data has been grouped into the following: children aged 3-5, 6-8 and 9-12.

As noted previously, for safeguarding reasons, exposure to PPC and one type of PC (specifically sexual abuse or harassment) is not asked of children under 13, which means that certain comparisons are limited to older age groups.

Two clear patterns emerge from the age analysis: First, children below 13 are already encountering all types of PPC, PC and NDC tracked in *Pulse*, despite many major platforms where children may encounter this content setting a minimum age of 13. Second, exposure to harmful content appears to peak during early adolescence, with children aged 13-15 reporting the highest levels of exposure to several forms of harmful content tracked in *Pulse*.

⁴ Ofcom, *Keep underage children off your platforms, Ofcom tells tech firms* (March 2026), [link](#).

⁵ Internet Matters, *Children's Wellbeing in a Digital World 2025* (2025), [link](#).

Exposure among children below 13

Figure 6: Parents' data on children aged 3-12 exposure to PPC

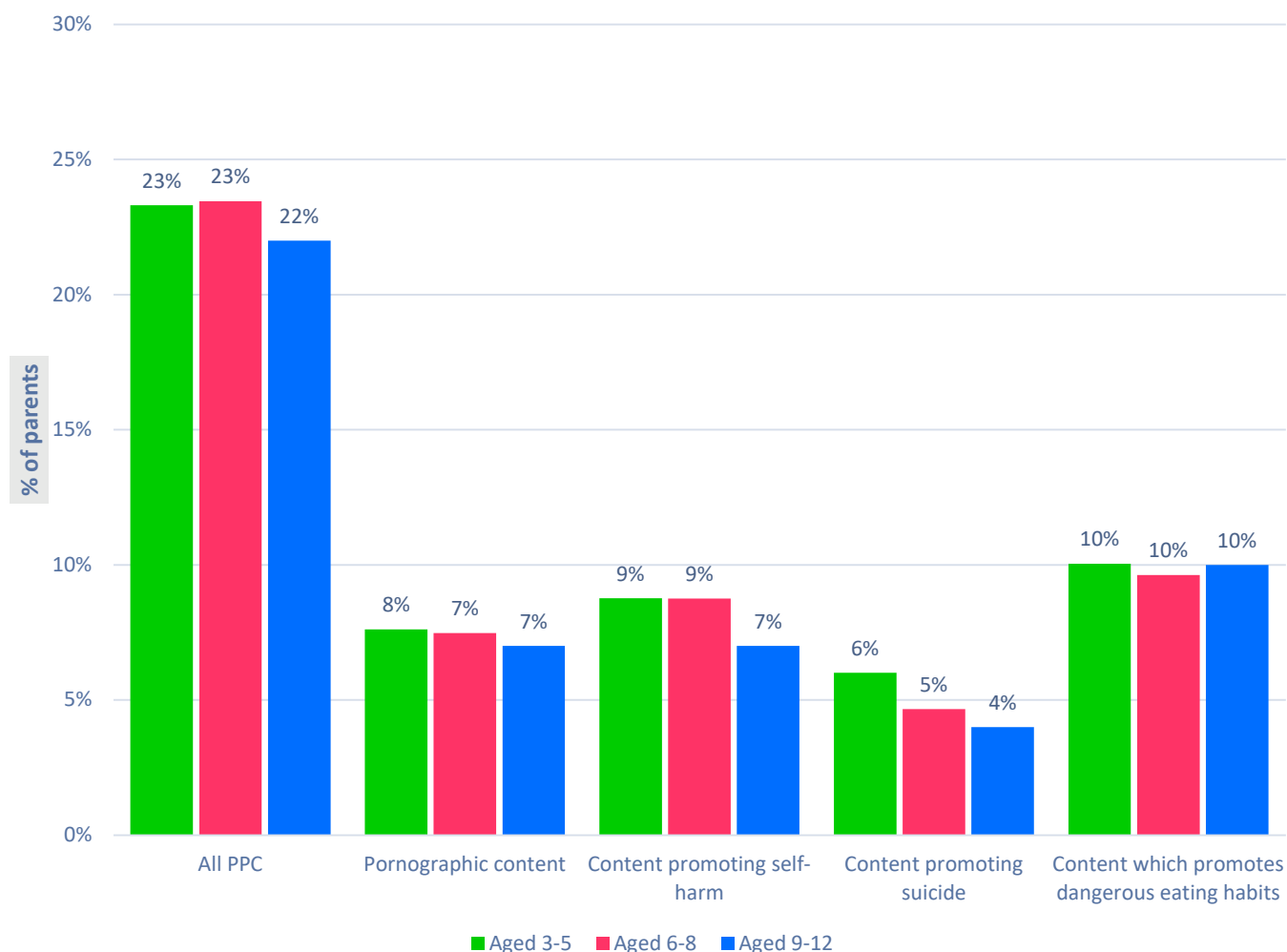


Figure 6: Parents' data on children aged 3-12 exposure to PPC

Base: Wave 22 dataset (parents' survey [weighted]) – Parents with at least one child aged 3-5 (769); Aged 6-8 (706); Aged 9-12 (586)

Nearly a quarter of parents with a child aged 3-5 and 6-8 (both 23%) report their child encountering at least one form of PPC, while the figure is 22% for parents of children aged 9-12. These include exposure to pornographic content, self-harm and suicide content and material promoting dangerous eating habits.

Figure 7: Children aged 9-12 exposure to PC and NDC

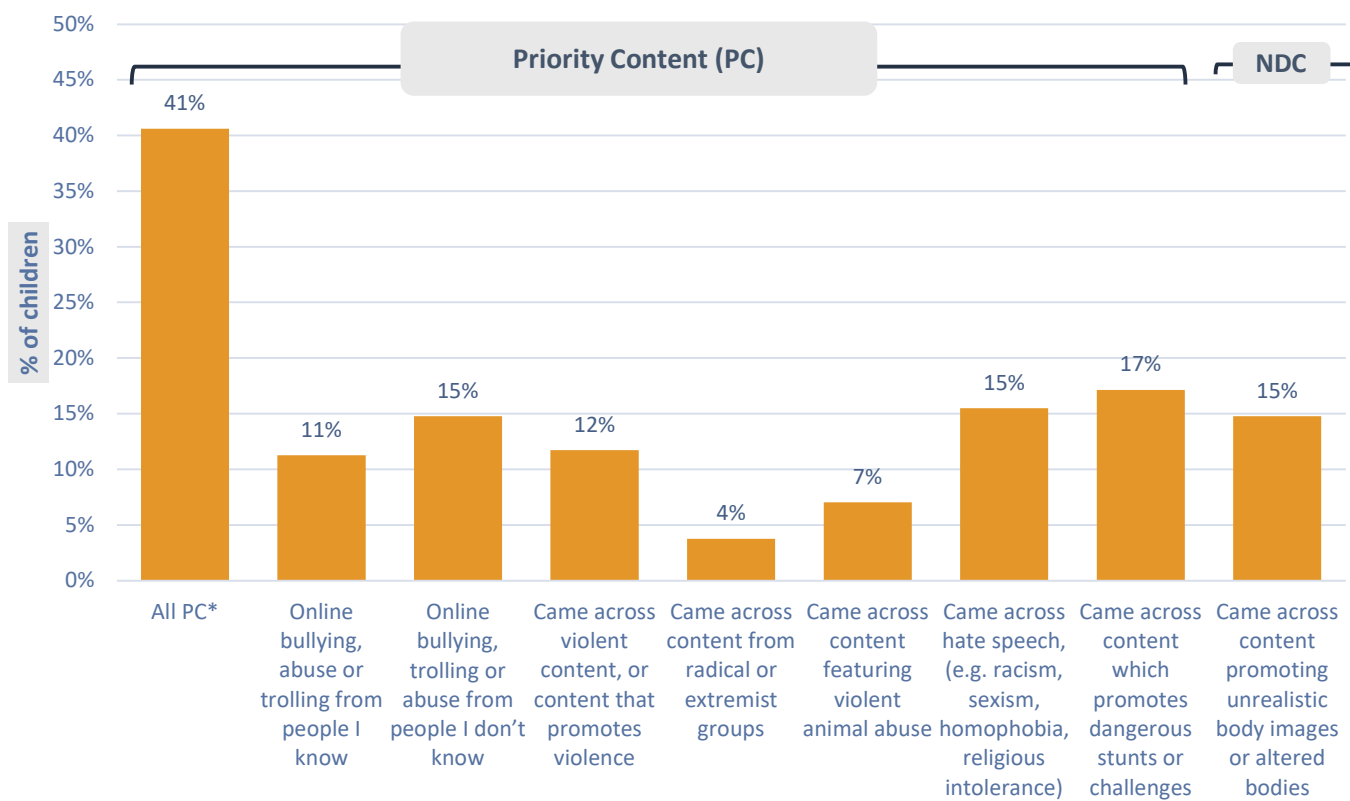


Figure 7: Children aged between 9-12 exposure to PC

*All PC figure and chart excludes 'Sexual abuse or harassment' figure as this was only asked to children 13+.

Base: Wave 22 dataset – children aged 9-12 (426)

Children aged 9-12 also report encountering several forms of PC. Overall, 41% of children aged 9-12 report encountering at least one type of PC,⁶ with notable proportions reporting exposure to content promoting dangerous stunts or challenges (17%), online bullying from strangers (15%) and hate speech (15%). Children aged 9-12 also tell us they encounter NDC, such as content promoting unrealistic body images or altered bodies (15%).

⁶ This figure excludes 'Sexual abuse or harassment' as this form of PC was only asked to children 13+.

Figure 8: Parents' data on children aged 3-8 exposure to PC and NDC

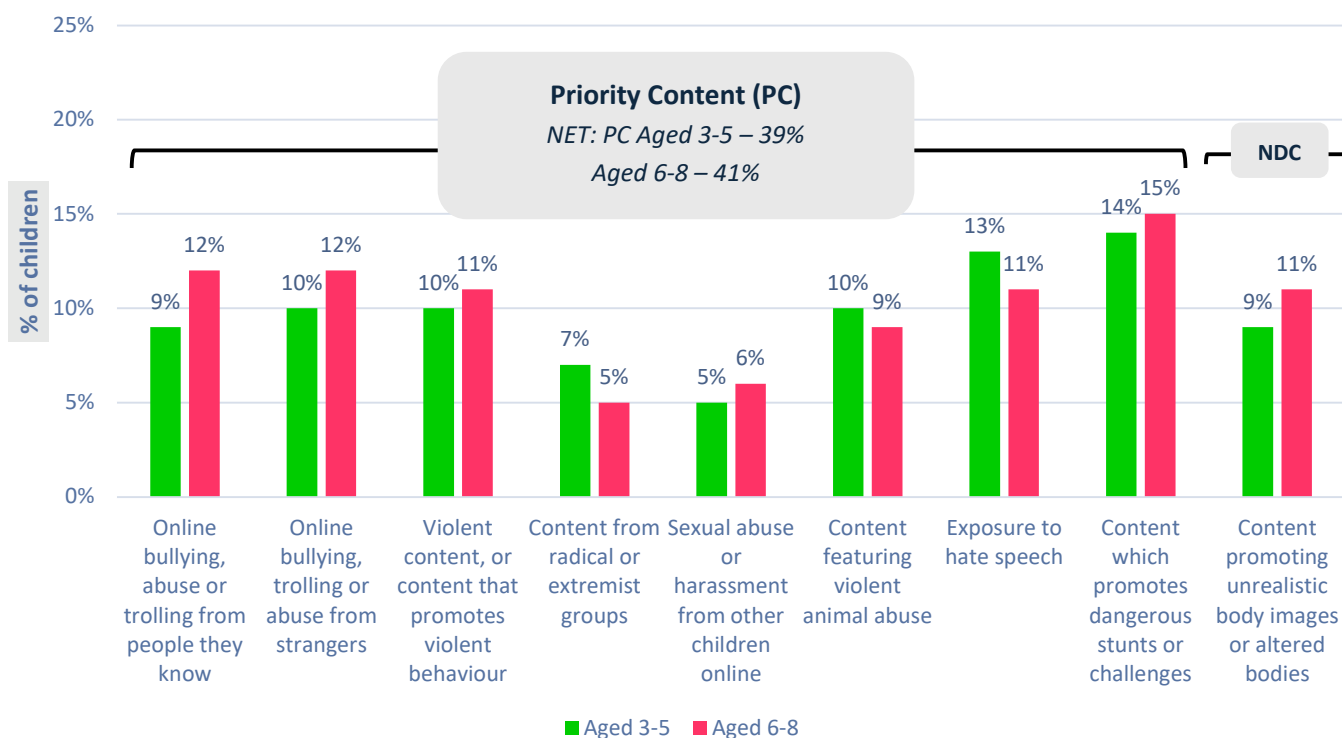


Figure 8: Parents' data on children aged 3-8 exposure to PC and NDC

Base: Wave 22 dataset (parents' survey [weighted]) – Parents with at least one child aged 3-5 (769); Aged 6-8 (706)

Parent-reported data suggests exposure to PC may begin even earlier. Parents report that 39% of children aged 3-5 and 41% of those aged 6-8 have encountered at least one type of PC tracked in Pulse.

As many major platforms set a minimum age of 13, these findings suggest that minimum age requirements are not being enforced effectively. This is particularly important because services designed for users aged 13 and over are unlikely to account for the developmental needs and safety of younger children. As a result, under-13s may be accessing environments where content, features and systems are not designed with their safety in mind, increasing their risk of exposure to harmful content. Internet Matters therefore welcomes Ofcom's recent statement requiring stronger action on age assurance and minimum age enforcement.⁷ Our findings suggest that robust enforcement in this area will be essential if the protections set out in the Online Safety Act are to reduce children's exposure to harm in practice.

Exposure among older children

The below findings suggest that children's exposure to harmful content does not increase linearly with age but instead peaks among younger teenagers aged 13-15. This likely reflects a transitional period in which children begin accessing platforms designed for older users, but where safeguards are not yet effectively tailored to their needs. When considered alongside evidence that children under 13 are also accessing these services, this points to a broader systemic issue: platform environments are not consistently calibrated to reflect children's age and stage of development. This underscores the importance of robust

⁷ Ofcom, *Keep underage children off your platforms, Ofcom tells tech firms* (March 2026), [link](#).

age assurance, effective enforcement of minimum age requirements, and stronger age-appropriate design measures to ensure that protections apply in practice across different stages of childhood.

Figure 9: Children aged 13-17 exposure to PPC

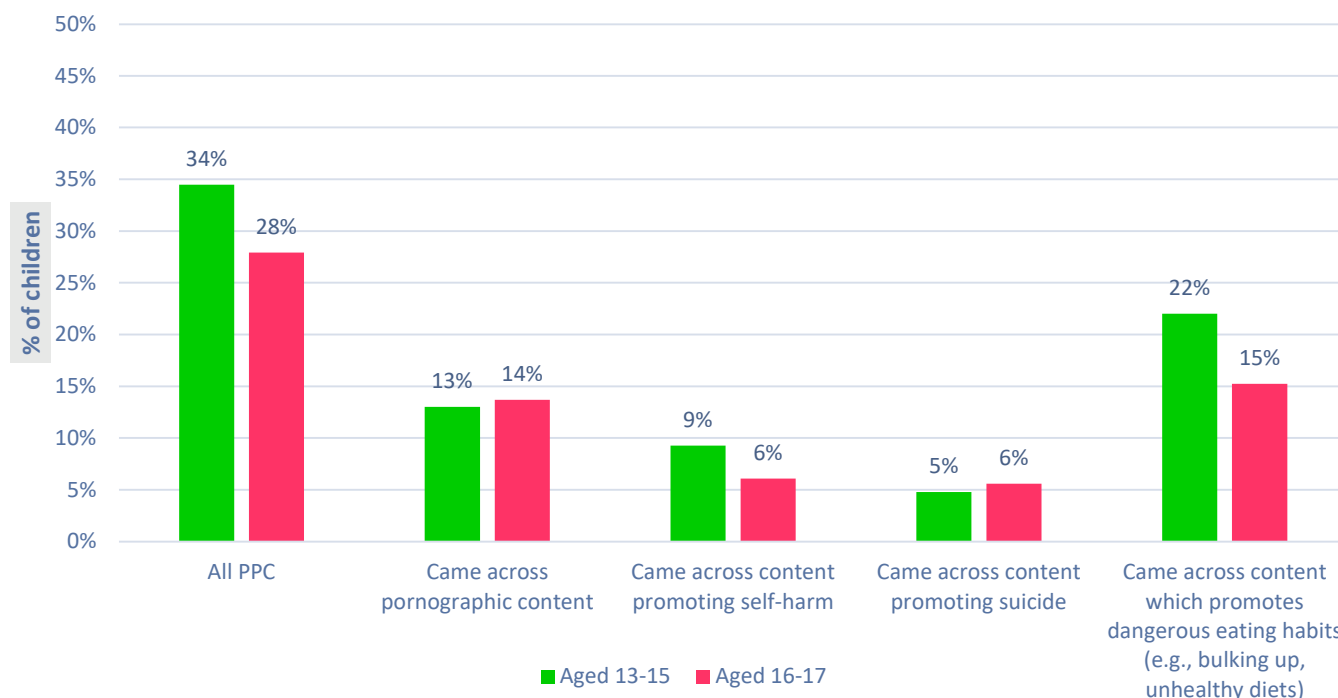


Figure 9: Children aged 13-17's exposure to PPC

Base: Wave 22 dataset – Children aged 13-15 (377); aged 16-17 (197)

Among older children (aged 13-17), exposure to at least one type of PPC is highest among those aged 13-15 compared to those aged 16-17. 34% of children aged 13-15 report encountering at least one type of PPC compared with 28% of those aged 16-17.

Given that PPC includes the most harmful categories of content, which platforms are expected to prevent children from accessing altogether, this finding is particularly concerning. It suggests that younger teenagers, who in theory are newly accessing many online services, are encountering content that should not be accessible to children at any age.

Exposure to specific PPC harms follows a similar pattern, wherein children aged 13-15 are reporting similar or higher levels of exposure compared to children aged 16-17. For example, exposure to content promoting dangerous eating habits appears higher among children aged 13-15 (22%) compared with those aged 16-17 (15%), although due to sample size this difference is not statistically significant.

Figure 10: Children aged 13-17 exposure to PC and NDC

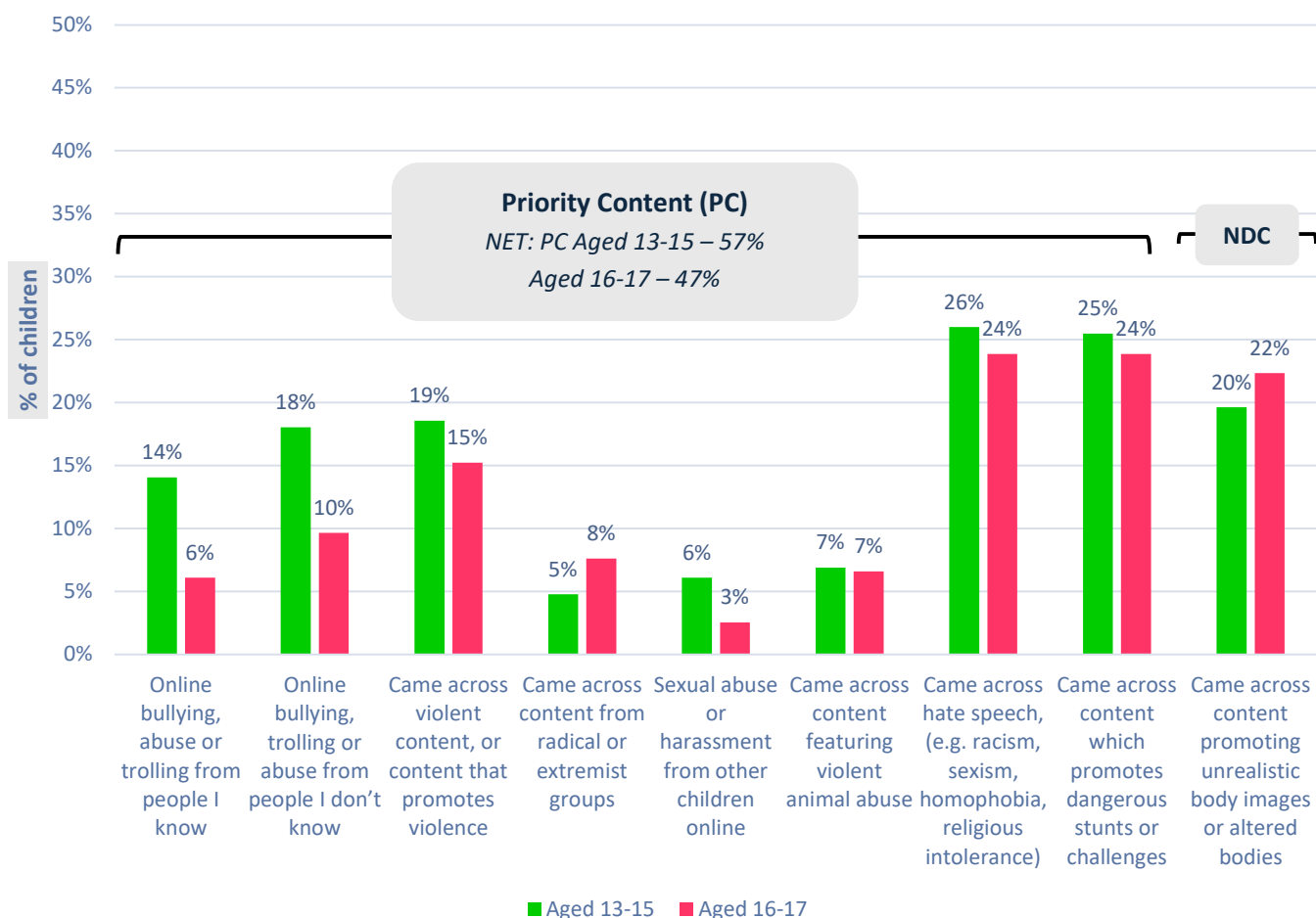


Figure 10: Children aged 13-17 exposure to PC and NDC

Base: Wave 22 dataset – Children aged 13-15 (377); aged 16-17 (197)

Exposure to at least one type of PC is also highest among those aged 13-15 compared to those aged 16-17 at a statistically significant level (57% cf. 47%). This is notable given that platforms are expected to provide age-appropriate access to PC. The higher levels of exposure among younger teenagers suggest that current mitigations may not be effectively differentiating between younger and older children.

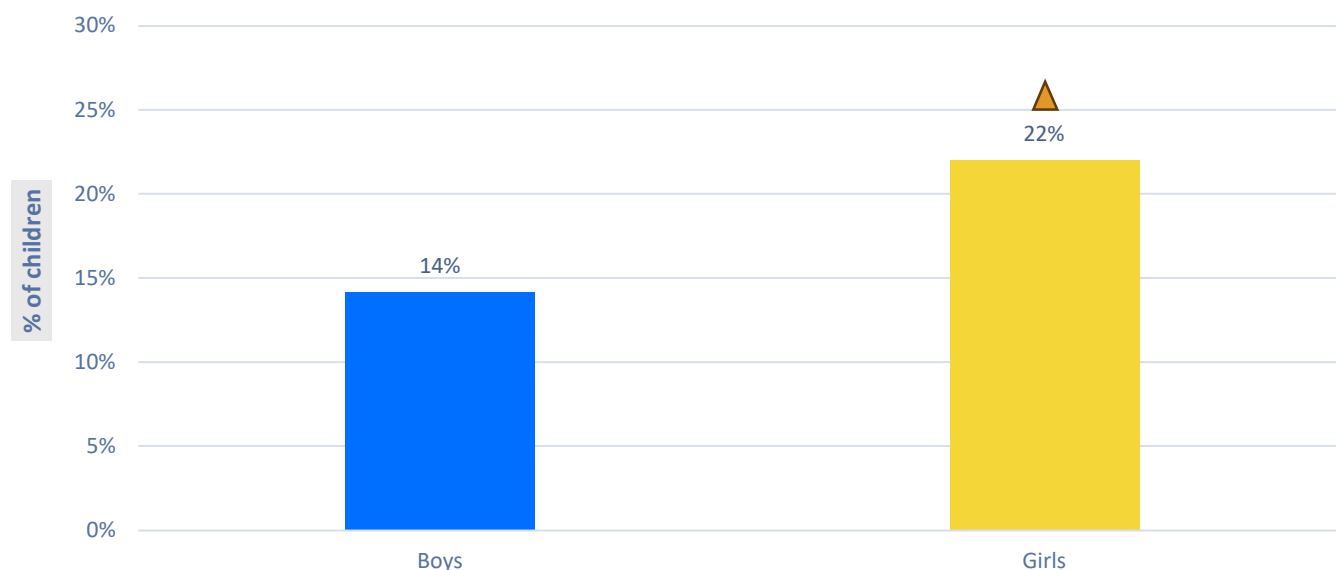
At the individual harm level, children aged 13-15 report similar or higher levels of exposure to PC compared to those aged 16-17. The most pronounced differences relate to online bullying: 14% of children aged 13-15 report bullying from people they know, compared to 6% of those aged 16-17. Similarly, 18% of children aged 13-15 report bullying from people they do not know, compared to 10% of those aged 16-17. Both of these differences are statistically significant.

Children aged 13-15 are also statistically more likely to report sexual abuse or harassment from other children compared to children aged 16-17 (6% cf. 3%).

Exposure based on gender

Children's exposure to harmful content in Wave 22 has been broadly similar across genders for most categories tracked in *Pulse*. However, differences emerge in relation to content promoting unrealistic body images or altered bodies, categorised as NDC.

Figure 11: Children's exposure to content promoting unrealistic body content (NDC) – gender comparison



▲ **Statistical significance**

Figure 11: Children's exposure to content promoting unrealistic body content (NDC) – gender comparison

Base: Wave 22 dataset – Boys (508); Girls (490)

In Wave 22, 22% of girls reported encountering this type of content, compared with 14% of boys, a statistically significant difference.

Previous Internet Matters research shows that appearance-related content can form a persistent feature of girls' online environments. Our research exploring teenage girls' experiences of harm online found that content relating to beauty standards, dieting and body ideals can shape expectations around appearance and influence how girls evaluate themselves.⁸

Findings from Internet Matters' *Digital Wellbeing Index* also show that children commonly encounter content promoting unrealistic body types online, and that encountering this type of content can have a negative impact on children's emotional wellbeing.⁹

These findings suggest that appearance-related content may play a particularly important role in shaping girls online experiences.

⁸ Internet Matters (2024), "So standard it's not noteworthy" Teenage girls' experiences of harm online. Available at: [source](#)

⁹ Internet Matters (2026), "The Gender Gap: Understanding and responding to girls' and boys' online experiences". Available at: [source](#)

Exposure based on sexual orientation

In *Pulse* we do not track sexual orientation, however, as part of our *Digital Wellbeing Index*, Internet Matters asks children aged 12+ their sexual orientation.¹⁰ Combining data from 2023 – 2025 we get a sample of 102 children who identify as LGBTQ+ (made up of children who self-identify as gay, lesbian, bi-sexual and pan sexual).

When we look at this data in terms of exposure to content harmful to children, we do find some statistically significant differences between children who identify as heterosexual and those who identify as LGBTQ+. LGBTQ+ children are more likely to have:

- Received abusive or upsetting messages from people they know in real life (25% cf. 18% of heterosexual children)
- Experienced bullying, abusive or upsetting messages / comments online from people you don't know (31% cf. 20% of heterosexual children).
- Seen racist, homophobic or sexist content (36% cf. 26% of heterosexual children)
- Seen content that promotes unrealistic body types such extremely skinny or muscular ones (34% cf. 26% of heterosexual children)
- Seen content about self-harm (33% cf. 17% of heterosexual children)

Sample sizes relating to the impact this has on LGBTQ+ children, including distress levels, are too small to draw meaningful conclusions.

The role of platform functionalities in shaping children's exposure to harmful content

As outlined in Ofcom's Children's Register of Risks¹¹, children's exposure to harmful material is not just influenced by individual pieces of content but also the by the design and operation of online services, including recommender systems, social features and content feeds.

Internet Matters' research consistently shows that these platform functionalities play a significant role in determining both the likelihood and nature of children's exposure to harm.

Findings from *Connected & Conflicted*, published in April 2025, demonstrate how specific platform features can increase children's risk of harm.¹² For example, children who use chatrooms are twice as likely to be contacted by a stranger (40%) compared with those who do not use chatrooms (19%). Similarly, exposure to hate speech was substantially higher among Reddit users aged 15-17 (55%) compared with non-users in the same age group (19%). These findings suggest that the environments and interaction mechanisms built into platforms can meaningfully shape children's exposure to harmful experiences.

Evidence from *Informed of Overwhelmed?*, published in October 2025, highlights the role of recommender systems and content feeds in shaping exposure. 40% of children and young people who get their news from social media say do not follow news-focused accounts, with many reporting they come across news

¹⁰ For further explanation of our Digital Wellbeing Index, including method, please see our most recent report: Internet Matters, *Children's Wellbeing in a Digital World* (2025), [Link](#).

¹¹ Ofcom, Children's Register of Risks (April 2025), [link](#).

¹² Internet Matters, *Connected & Conflicted* (April 2025), [link](#).

content in their recommender feeds.¹³ The way such content is delivered can make it difficult for children, particularly younger users, to contextualise what they see. This can contribute to confusion, anxiety and reduced trust in information online. Six in ten (61%) children and young people who consume news on social media report that they have seen a story that worried or upset them in the past month, including content relating to war and conflict, violence and death and crisis events.

In this context, Internet Matters welcomes Ofcom's March 2026 statement requiring platforms to ensure that algorithms and recommender systems operate safely for child users.¹⁴ Effective enforcement of these requirements will be essential to ensuring that the Online Safety Act meaningfully reduces children's exposure to harmful content. Addressing harmful content alone will not be sufficient if the systems and features that distribute, recommend or amplify that content continue to expose children to risk.

The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.

While Internet Matters does not track the specific services where children encounter the harms discussed above, our research provides insight into the types of online environments children are most frequently using.

Our research suggests that children may encounter harmful or distressing content across a wide range of online environments, including social media platforms, messaging services and AI chatbots.

Use of platforms by children aged 9-12

Figure 12: Use of popular platforms by children aged 9-12

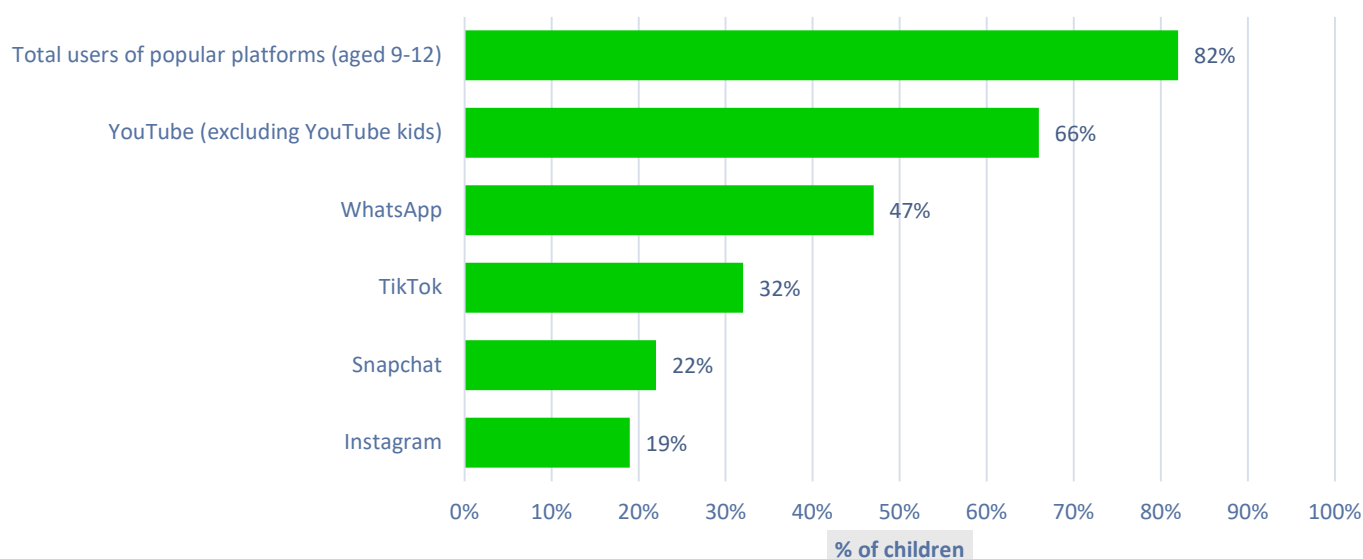


Figure 12: Use of popular platforms by children aged 9-12

Base: Wave 22 dataset – Children aged 9-12 (394)

¹³ Internet Matters, *Understanding the impact of news on children's wellbeing* (October 2025), [link](#).

¹⁴ Ofcom, *Keep underage children off your platforms*, Ofcom tells tech firms (March 2026), [link](#).

Internet Matters' Wave 22 Pulse data shows that a substantial proportion of children aged 9-12 use services that set minimum age requirements (typically at age 13) in their terms of service. Across the platforms above, 82% of 9–12-year-olds use them regularly.

YouTube (excluding YouTube Kids) is the most widely used platform among this age group, with 66% of children reporting that they use the service. Other commonly used platforms include WhatsApp (47%), TikTok (32%) and Snapchat (22%).

These findings suggest that many younger children are accessing online environments that are primarily designed for older users. Where this occurs, children may be more likely to encounter content that is unsuitable for their age or developmental stage, including violent content, hate speech, dangerous challenges or content promoting unrealistic body images. They also may be impacted by such content more severely than older children.

These findings further highlight the importance of ensuring that platforms enforce minimum age requirements and provide age-appropriate experiences for younger users.

Children's use of AI chatbots

Internet Matters' research shows that children are engaging with AI chatbots, despite the fact that many of these services are not designed specifically for child users and often set minimum age requirements of 13 or older.¹⁵

Our research found 64% of children aged 9-17 are using AI chatbots, including 58% of those aged 9-12. AI chatbots most commonly used include ChatGPT, Google Gemini and Snapchat's My AI. These findings are based on data collected between April and May 2025.

These findings were reinforced by testing of the platforms, conducted as part of the research in 2025, which found that child users were easily able to access and interact with ChatGPT, Snapchat's My AI and Character AI, despite minimum age requirements. During testing, simulated child users were able to engage with these systems on a range of topics, including sensitive issues such as body image, relationships and sexual advice. This highlights how conversational AI systems can respond to queries relating to topics that may not always be appropriate for younger users.

As AI chatbots become increasingly integrated into children's digital lives, it will be important that regulatory frameworks keep pace with the risks these systems may pose. External research has already raised concerns about how some conversational AI systems respond to prompts to assist users planning violent attacks. The Centre for Countering Digital Hate (CCDH) found that 8 in 10 popular AI chatbots assisted users in over half of test interactions, including by providing information about potential targets or weapons. The study also found that 9 in 10 chatbots failed to consistently discourage users expressing violent intent, with some systems providing practical guidance that could facilitate real-world harm.¹⁶ When creating accounts on each chatbot platform, the user's age was set to the minimum age for the platform where possible.

¹⁵ Internet Matters, *Me, Myself and AI* (2025), [link](#).

¹⁶ Centre for Countering Digital Hate, *Killer apps* (March 2026), [link](#).

The CCDH's findings highlight that AI systems can respond to harmful user prompts in ways that go beyond just exposing users to harmful content, as these systems can generate tailored and actionable outputs in real time. This raises questions about whether current regulatory approaches are sufficiently equipped to address these types of risks. Ensuring that safeguards are in place to prevent harmful responses, particularly where children may be exposed, will be an important consideration for policymakers.

While the Government has proposed an amendment to the Crime and Policing Bill to bring certain AI chatbot services into scope of the Online Safety Act, the proposed approach would only apply the Act's illegal content duties to these services. This would leave a significant regulatory gap, as AI chatbots that are widely used by children would not be subject to the Act's children's safety duties. Given the growing role these technologies play in children's online experiences, Internet Matters encourages Ofcom to highlight this issue in its report to the Secretary of State and to advocate for Government to ensure that AI chatbot services used by children are brought fully within the scope of the Online Safety Act's child safety framework.

Part 2: The severity of harm that children in the UK suffer, or may suffer, as a result of content that is harmful to children. This could include:

(Section 1) 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.

Internet Matters Pulse also asks children to indicate the impact of harmful content. Children who reported encountering a particular type of harmful content were asked to rate the extent to which the experience affected them using a scale from 1-7, where 5-7 indicates that the experience caused high levels of distress, upset or harm. The below data is based on the number of children who selected 5-7 when asked to rate the extent to which the experience affected them.

Data from Wave 22 shows that a significant proportion of children who encountered harmful content reported experiencing high levels of distress or harm as a result.

Distress caused by exposure to PPC

Our data shows that several forms of PPC can cause significant distress or harm when children encounter them.

Figure 13: Children reporting high levels of distress from exposure to PPC

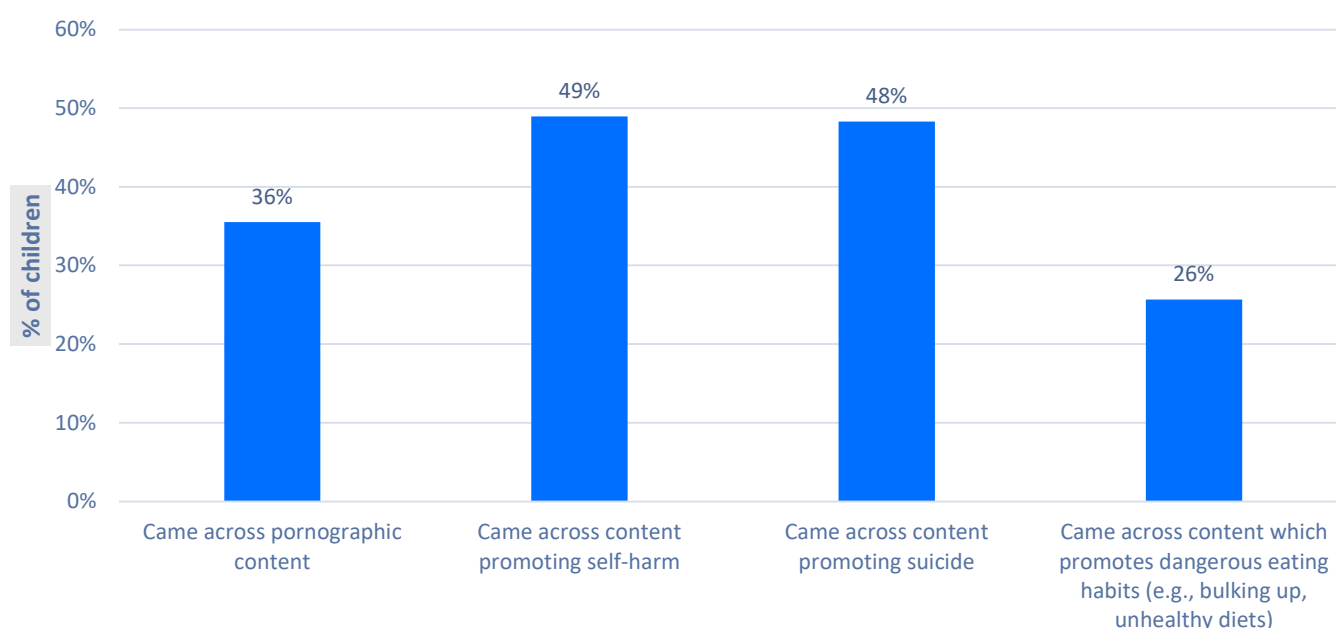


Figure 13: Children reporting high levels of distress from exposure to PPC

Base: Floating bases of those who have experienced each harm

Nearly one in two children reported serious distress after encountering content promoting self-harm (49% of children) and suicide (48%). Meanwhile, 36% reported serious distress after encountering pornographic content.

These findings demonstrate that exposure to PPC can have a substantial psychological impact on children, particularly in relation to self-harm and suicide-related content. Given the severity of these harms, preventing children from encountering PPC should remain a critical objective of Ofcom's enforcement of the Online Safety Act.

A quarter (26%) of children reported distress after encountering content promoting dangerous eating habits. External research suggests that this type of content can also have serious long-term impacts on children's wellbeing. Studies have found that exposure to dieting and appearance-focused content on social media is associated with increased body dissatisfaction and disordered eating behaviours among adolescents.¹⁷

¹⁷ Rubinia Celeste Bonfanti, Francesco Melchiori, et al., *The association between social comparison in social media, body image concerns and eating disorder symptoms: A systematic review and meta-analysis* (March 2025), [link](#).

Research examining so-called “pro-eating disorder” content online has also found that these spaces can normalise harmful behaviours such as extreme calorie restriction and concealment of eating disorders.¹⁸ These harms may develop gradually through repeated exposure, meaning children may not always recognise the risks associated with such content when they first encounter it.

Distress caused by exposure to PC

The chart below shows the proportion of children who reported that encountering different types of PC caused them serious distress, upset or harm.

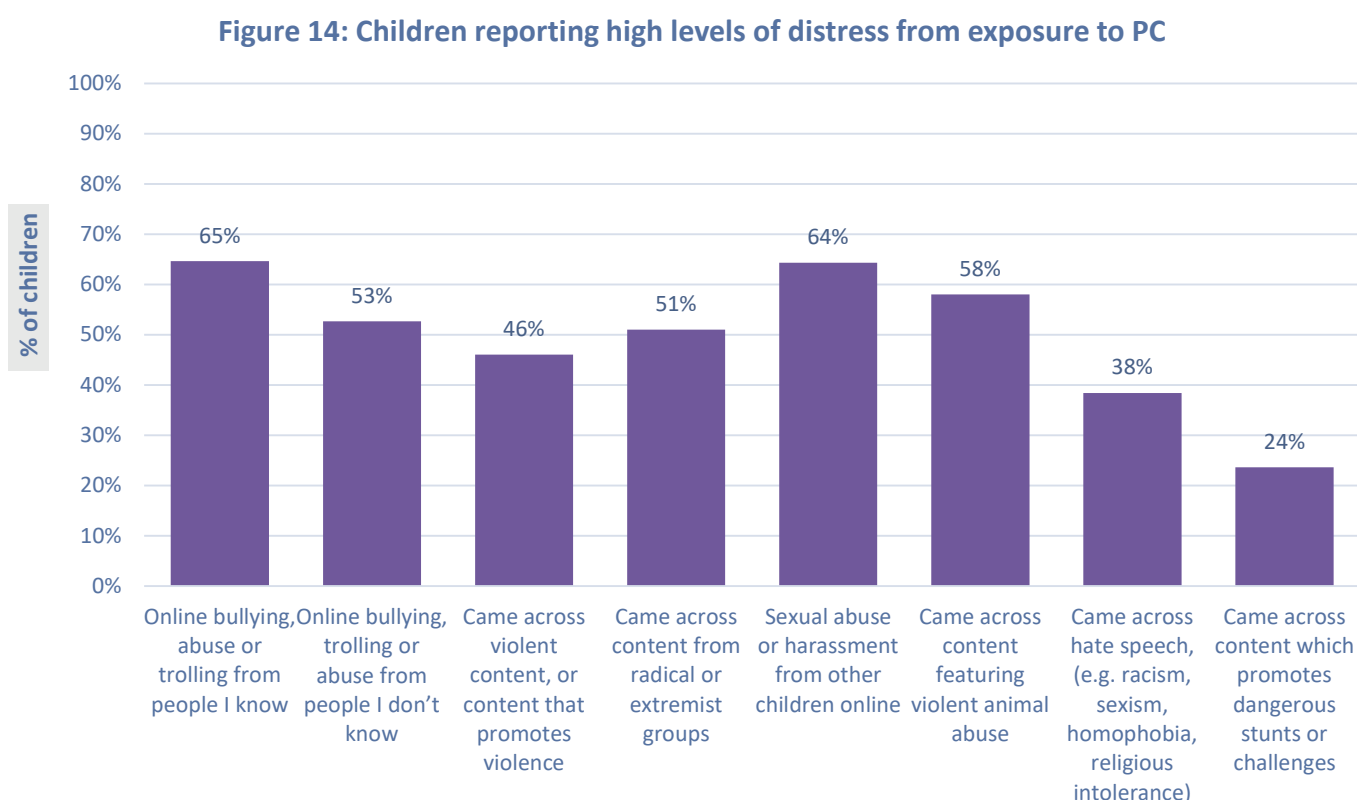


Figure 14: Children reporting high levels of distress from encountering each type of PC

Base: Floating bases of those who have experienced each harm

Across several categories of PC, a substantial share of children report experiencing significant harm when they encounter this content. For example, roughly two in three children have reported serious distress from online bullying by people they know (65% of children) and serious distress from sexual abuse or harassment from other children (64%).

A smaller proportion of children reported serious distress after encountering content promoting dangerous stunts or challenges (24%). However, this does not necessarily mean these forms of content are less harmful. Unlike forms of harm that primarily cause emotional distress, dangerous challenges often operate

¹⁸ Alexandra Dane and Komal Bhatia, *The social media diet: A scoping review to investigate the association between social media, body image and eating disorders amongst young people* (2023), [link](#).

through behavioural influence and imitation which can have life threatening consequences.¹⁹ This must be taken into consideration when assessing the impact of harm on children.

Distress caused by exposure to NDC

Our findings show that 29% of children who encountered content promoting unrealistic body images or altered bodies report that it caused them serious distress, upset or harm.

Although the proportion reporting immediate distress is lower than for several forms of PPC and PC, external research suggests that appearance-related content can have significant impacts on children's wellbeing, particularly through repeated exposure over time.

Studies have found that exposure to appearance-focused content is associated with body dissatisfaction, lower self-esteem and disordered eating behaviours among adolescents. Research also suggests that social media environments can amplify these effects by repeatedly surfacing appearance-focused content through recommendation systems and algorithmically curated feeds.²⁰

As a result, the harms associated with this type of content may develop cumulatively rather than through a single distressing interaction, influencing how children evaluate their appearance and shaping expectations around body image over time.

Evidence of cumulative harms of such content may therefore warrant further consideration to see whether this harm is accurately reflected within Ofcom's Children's Register of Risk.

Further to the above types of content, Internet Matters' report *Informed of Overwhelmed?* (fieldwork conducted from August – September 2024) suggests that exposure to harmful or distressing news content online can contribute to a range of negative emotional and psychological outcomes for children, particularly where children encounter such content unexpectedly or repeatedly through online platforms. We found that many children encounter distressing news stories through social media from a young age.²¹

Among children who consume news on social media, 61% reported seeing a news story in the past month that caused them worry or upset. Of these children, 39% reported feeling very or extremely worried or upset by the story. Children reported encountering a wide range of distressing topics. News about war and conflict was the most commonly reported (59%), followed by news about violence or death (19%) and crisis events (10%).²²

Children in the research noted that such content often appears unexpectedly within social media feeds, sometimes without warnings or contextual information. This suggests that algorithmically curated environments may play an important role in shaping children's exposure to distressing or violent material online.

¹⁹ Lara Kobilke and Antonia Markiewicz, *Understanding youth participation in social media challenges: A scoping review of definitions, typologies, and theoretical perspectives* (August 2024), [link](#).

²⁰ Suzanne E Mazzeo, Madison Weinstock, et al., *Mitigating Harms of Social Media for Adolescent Body Image and Eating Disorders: A Review* (July 2024), [link](#).

²¹ Internet Matters, *Understanding the impact of news on children's wellbeing* (October 2025), [link](#).

²² Ibid.

These findings emphasise the importance of considering not only individual pieces of harmful content but also how the design and operation of online services influence children's exposure to such material and the harms that may result.

(Section 3) 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.

Severity of harm among vulnerable children

Internet Matters' research suggests that some groups of children may experience different severities of harm they report after encountering such material.

Due to some small sample sizes, we have not determined statistical significance in the proportion of vulnerable children reporting serious distress after encountering harmful content compared with children without vulnerabilities. However, some directional differences are visible in the data across several of the harmful content categories.

Figure 15: Vulnerable children reporting high levels of distress from exposure to PPC

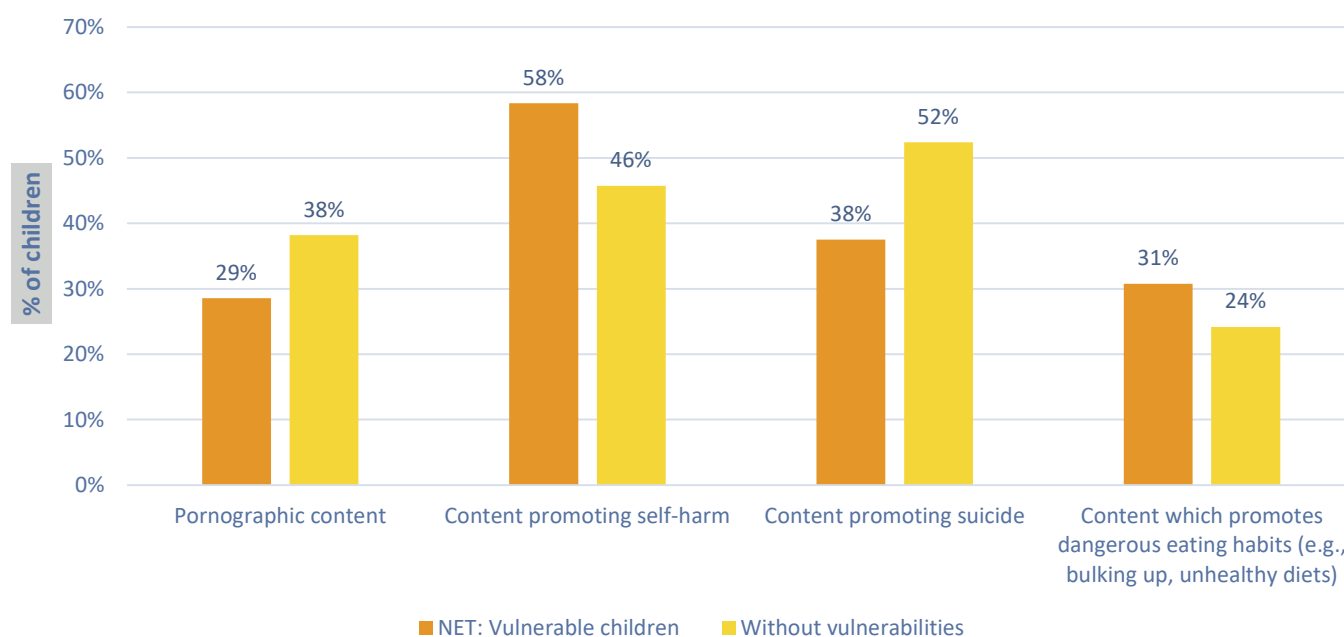


Figure 15: Vulnerable children reporting high levels of distress from exposure to PPC
Base: Floating bases of those who have experienced each harm

As shown above, distress levels vary between children with and without vulnerabilities. The only PPC content that vulnerable children appear to experience more distress in is encountering self-harm content (58% compared with 46% of children without vulnerabilities).

Figure 16: Vulnerable children reporting high levels of distress from exposure to PC

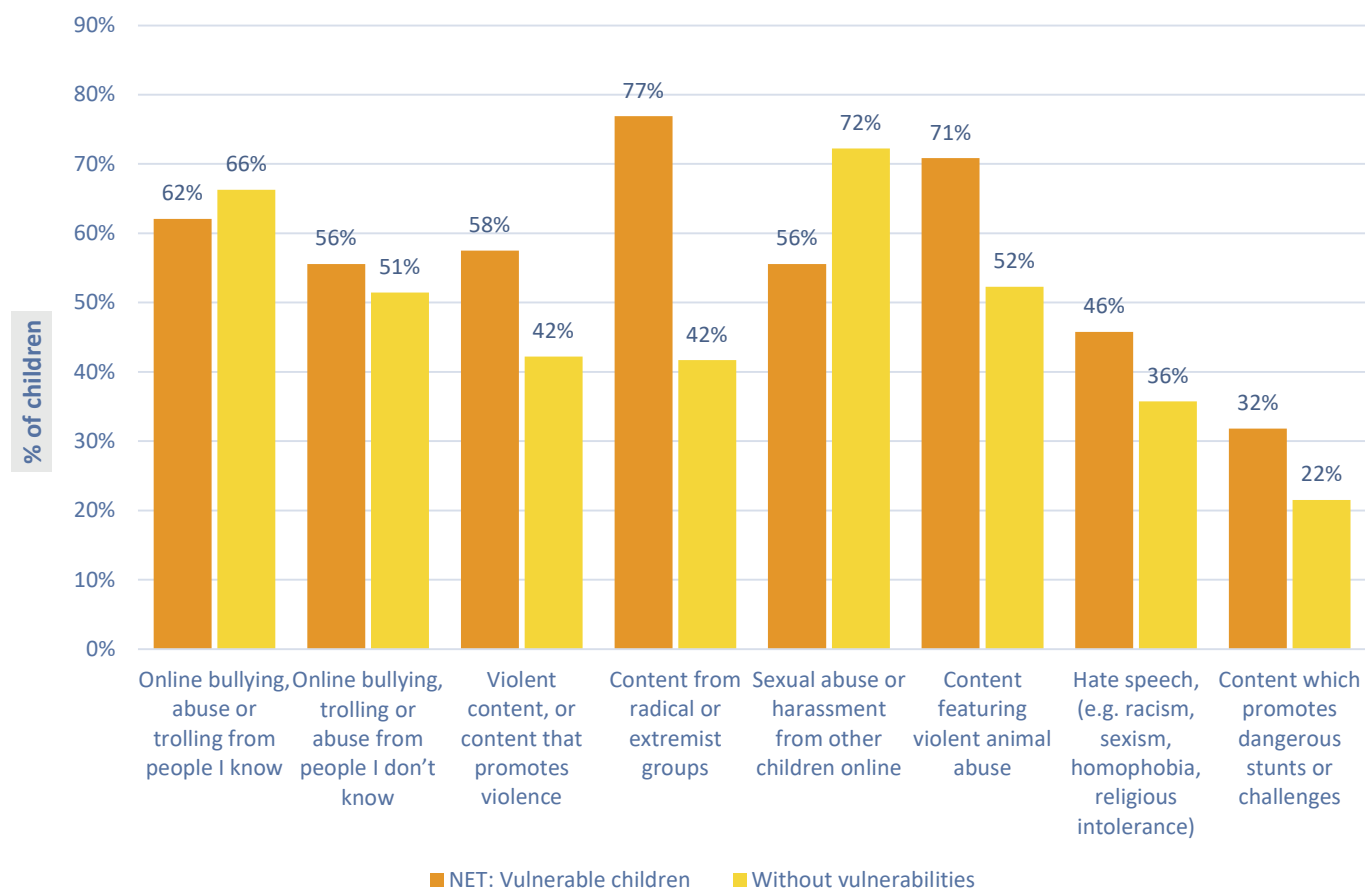


Figure 16: Vulnerable children reporting high levels of distress from exposure to PC
 Base: Floating bases of those who have experienced each harm

PC content where vulnerable children are more affected include:

- Violent content or content promoting violence: 58% of vulnerable children reported high levels of distress, compared with 42% of children without vulnerabilities.
- Content featuring violent animal abuse: 71% of vulnerable children reported high levels of distress, compared with 52% of children without vulnerabilities.
- Content from radical or extremist groups: 77% compared with 42%

Among children who encountered content promoting unrealistic body images or altered bodies (NDC), 40% of vulnerable children reported serious distress, compared with 25% of children without vulnerabilities.

While we have not determined statistical significance in this sample, the findings in Part 1 show that vulnerable children are significantly more likely to encounter several forms of harmful content online, particularly within the PC category. As many of these harms are associated with high levels of distress among children who encounter them, higher exposure may translate into greater overall risk of harm for vulnerable children. Furthermore, distress may not always be the best measure as some children may become desensitised to this content when they encounter it frequently.

These findings highlight the importance of ensuring that the protections set out in the Online Safety Act work effectively for children who may already face additional risks online, including those with additional needs.

Severity of harm based on gender

Pulse data and previous research by Internet Matters suggests that gender may influence the severity of harm children report after encountering harmful content online, although differences should be interpreted with caution due to small sample sizes.

Figure 17: Children reporting high levels of distress from exposure to PPC - gender

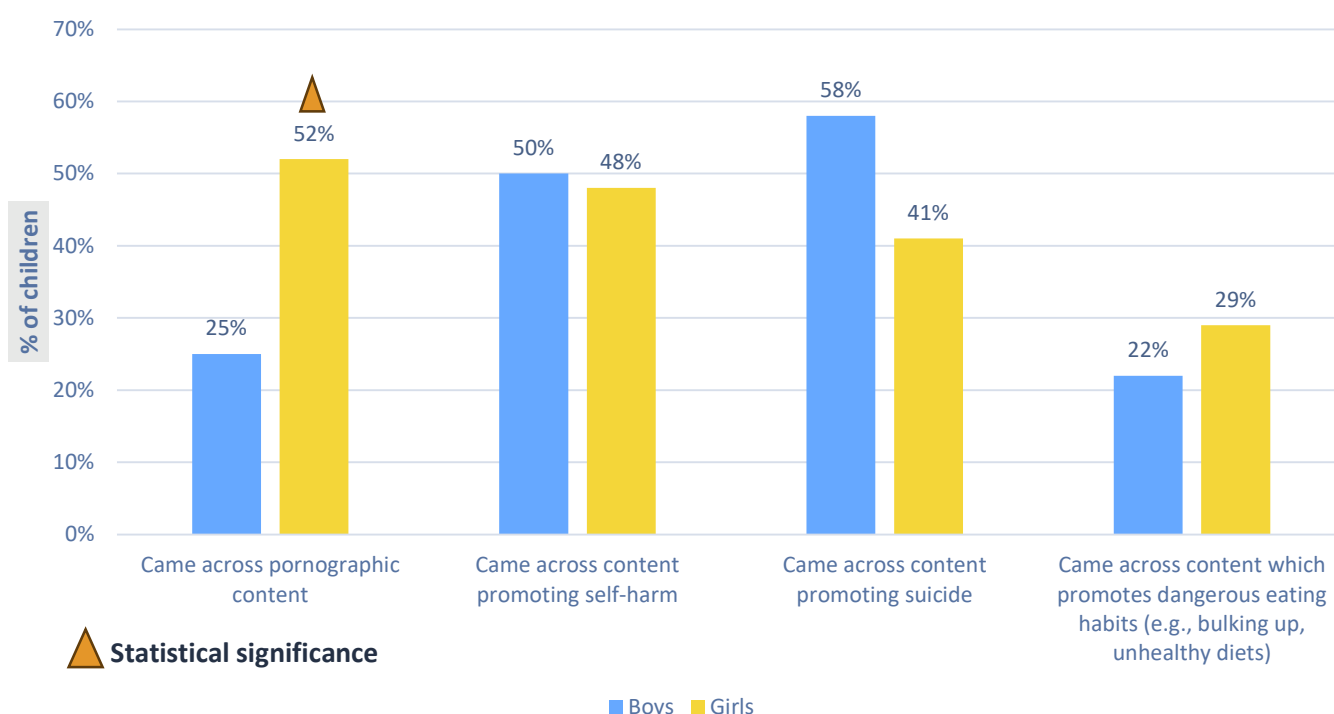


Figure 17: Children reporting serious distress from exposure to PPC by gender

Base: Floating bases of those who have experienced each harm

Girls report higher levels of distress after encountering pornographic content (52% cf. 25% of boys – statistically significant) as well as coming across content promoting dangerous eating habits (29% cf. 22%). On the other hand, boys report experiencing high levels of distress caused by content promoting suicide (58% cf. 41%), although due to small sample sizes this is not statistically significant. As noted, all of these figures should be interpreted with caution due to sample size.

Figure 18: Children reporting high levels of distress from exposure to PC - gender

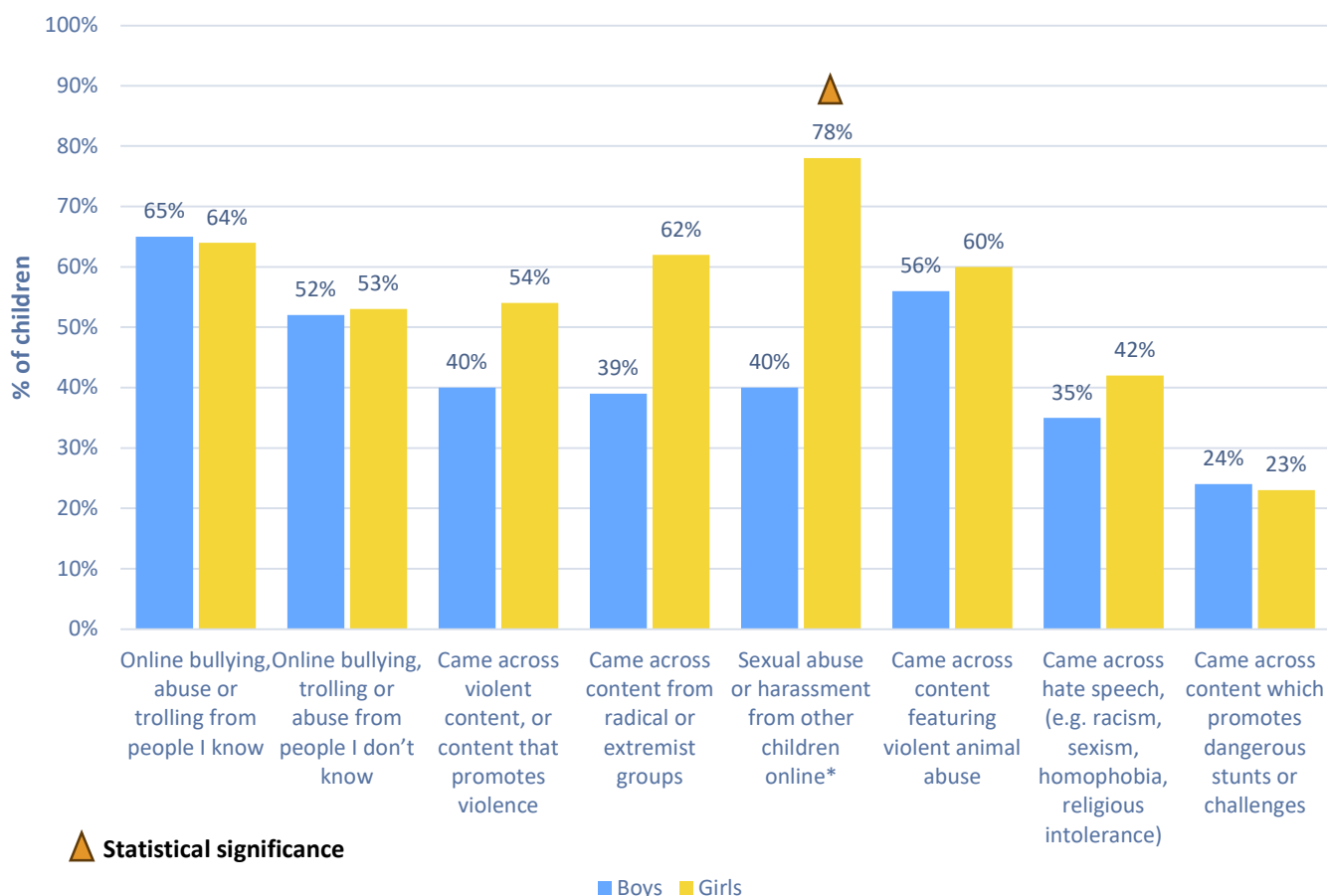


Figure 18: Children reporting high levels of distress from exposure to PC – gender

Base: Floating bases of those who have experienced each harm

Girls generally report slightly elevated distress compared with boys across a range of PC. In particular, they are significantly more likely to experience high levels of distress after sexual abuse or harassment from other children online (78% cf. 40%).

These findings broadly align with Internet Matters' briefing *The Gender Gap*, which finds that girls often experience greater emotional distress after encountering online harms, even where exposure rates are similar between boys and girls.²³

The briefing also found that the gap between boys' and girls' experiences of some online harms is narrowing. The briefing, based on Internet Matters' *Digital Wellbeing Index 2025* research, shows that boys' exposure to certain harms is rising and their levels of distress when encountering harmful content are increasing in several areas. 14% of boys reported in 2025 that seeing things online that worries or upsets them happens quite a lot or all the time, compared to 10% in 2024.

²³ Internet Matters, *The Gender Gap: Understanding and responding to girls' and boys' online experiences* (January 2026), [link](#).

The findings noted above highlight the importance of ensuring that regulatory responses address the needs of both boys and girls, while recognising that some harms may affect children differently depending on gender.

Part 3. Whether and how it might be appropriate to make changes to the kinds of PPC and PC in the Act. This could include:

Changes to the categories of PPC and PC

Internet Matters does not consider that any existing forms of PPC or PC should cease to be categorised as content harmful to children. Evidence presented in Parts 1 and 2 of this response demonstrates that children continue to encounter these types of content online and frequently report experiencing significant distress when they do.

Our research shows that substantial proportions of children report encountering harmful content online such as violent content (PC), bullying and harassment (PC), hate speech (PC) and self-harm and suicide content (PPC). When children encounter these harms, many report experiencing serious emotional distress. These findings underline the importance of maintaining strong regulatory protections for children in relation to these categories of content.

Similarly, Internet Matters does not consider that any existing forms of PPC should be reclassified as PC, as this would reduce the level of protection afforded to children under the Online Safety Act. Given the evidence of harm associated with these categories, lowering the regulatory threshold for platform responsibilities would risk weakening safeguards intended to protect children from particularly harmful forms of online content.

Given the extent to which children report experiencing distress when encountering these harms, maintaining clear and robust categorisation remains essential to ensuring that platforms take appropriate action to protect children.

However, our findings do highlight areas that Ofcom may wish to keep under review when advising the Secretary of State, particularly where evidence suggests that certain types of content may pose a heightened risk to vulnerable children.

For example, our research shows that one in five (21%) children encounter hate speech online and in particular, vulnerable children are significantly more likely to encounter it than children without these vulnerabilities (28% compared with 19%). When exposed to hate speech, a substantial proportion of children report experiencing high levels of distress (46% of vulnerable children and 36% of children without vulnerabilities). While the difference in distress between these groups is not statistically significant, the combination of higher exposure among vulnerable children and the significant levels of distress reported by those who encounter this content suggests that hate speech remains a particularly harmful online experience for many children.

These findings suggest that Ofcom should consider whether the current classification of hate speech as PC sufficiently reflects the risks it poses to children, particularly vulnerable children, and whether stronger categorisation may be warranted. In doing so, Ofcom should consider not only the severity of harm

experienced, but also the frequency with which children encounter this content and the extent to which it is age-appropriate to younger users.

Part 4. Evidence in support of additional kind(s) of content being added to the PPC or PC categories in the Act.

Content promoting unrealistic body images or altered bodies

Internet Matters' research suggests that some types of content currently treated as NDC may pose a material risk to children and therefore warrant further consideration within the regulatory framework.

In particular, children frequently report encountering content promoting unrealistic body images or altered bodies online (18%). In our most recent survey, 22% of vulnerable children and 17% of children without vulnerabilities reported encountering this type of content.

Among those who encounter such content, a notable proportion report experiencing high levels of distress. For example, 21% of boys and 34% of girls who had encountered this type of content reported that it caused them high levels of distress, upset or harm. The overall level of distress reported suggests that exposure to this type of content can have meaningful negative impacts on children's wellbeing.

This finding aligns with wider research linking exposure to idealised or manipulated body images online with body dissatisfaction, reduced self-esteem and poorer mental health outcomes among children and young people.²⁴ Given both the scale of exposure and the levels of distress reported, Ofcom may wish to consider whether content promoting unrealistic body images or altered bodies should be designated at PC.

Mis- and disinformation

Internet Matters also believes that Ofcom should consider whether mis- and disinformation should be recognised more explicitly as a category of content harmful to children within the Online Safety Act framework.

Children increasingly encounter inaccurate, misleading or manipulated information online, including content generated using AI. Our research shows that over a quarter of children (27%) say they have believed a fake or AI-generated news story, while a further 41% think they may have done so.²⁵

Exposure to such content can have a range of negative impacts on children. Children report feeling confused (30%), embarrassed (10%) or less trusting of news sources (31%) after encountering misleading or fabricated content online.²⁶

The impact is particularly pronounced among vulnerable children. Vulnerable children report higher levels of worry about online news (76% compared with 57% of children without vulnerabilities) and are almost twice as likely to report believing fake or AI-generated news stories (43% compared with 23%). They are also more likely to feel upset or embarrassed after encountering such content.

²⁴ Mental Health Foundation, Body image: How we think and feel about our bodies (2019), [link](#).

²⁵ Internet Matters, *Understanding the impact of news on children's wellbeing* (October 2025), [link](#).

²⁶ Internet Matters, *Understanding the impact of news on children's wellbeing* (October 2025), [link](#).

Concerns about the wider societal implications of mis- and disinformation are also increasing. *Internet Matters Pulse* shows that parental concern about online misinformation has increased from 61% in October 2023 to 78% in November 2025. Similarly, children themselves recognise the potential risks associated with misleading information online. The majority (79%) say that social media platforms should be required to label or fact-check false or misleading information, and 60% express concern about the impact of misinformation on election results.²⁷

These findings suggest that mis- and disinformation can have meaningful impacts on children's understanding of the world, their trust in information sources, and their participation in democratic processes. As the information environment continues to evolve - particularly with the rapid growth of generative AI - Ofcom may wish to consider whether mis- and disinformation should be recognised more explicitly within the categories of content harmful to children under the Act.

²⁷ Internet Matters, *Preparing young voters in today's online information environment* (February 2026), [link](#)