

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.	For too long, young people have been exposed to harmful content online. This has resulted in self-harm and even suicide. Children often come across this content without specifically having to search for it.¹ Change is needed to re-balance power in favour of users and to impose greater accountability on social media companies. Social media platforms are often designed to promote continued engagement, which could encourage overuse or even addiction-like behaviours among child users.² 75% of children informed an Internet Matters survey that they have experienced harm online.³ In response to the Big Ambition survey conducted by the Office of the Children's Commissioner, children identified a range of content that was causing them harm:

¹ Center for Countering Digital Hate (2022) *Deadly by Design: TikTok pushes harmful content promoting eating disorders and self-harm into young users' feeds*. Available at: <https://counterhate.com/research/deadly-by-design/> (Accessed: 10 March 2026).

² Business & Human Rights Resource Centre. (2023). Meta's platforms are allegedly designed to be addictive to children. Accessed January 27, 2026. <https://www.business-humanrights.org/en/latest-news/usa-meta-faces-allegations-of-designing-platforms-to-foster-addiction-in-children/>

³ Internet Matters (n.d.) Internet Matters Pulse. Available at: <https://www.internetmatters.org/pulse/> (Accessed: 9 March 2026).

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	child sexual abuse material; pornographic content; suicide, self-harm, and eating disorder content; abusive content and bullying hate content; and violent content.⁴ Below, we set out our understanding of the prevalence of each of the different categories of content on online platforms. <u>Primary Priority Content (PPC)</u> The 2025 national survey from the Children’s Commissioner reveals 70% of young people had seen online pornography before the age of 18, with 27% having seen pornography by the age of 11.⁵ 59% saw pornography accidentally and not by seeking it out. Significant proportions of these children encountered violent or degrading content, with 58% seeing violent content involving strangulation, and 44% having viewed depictions of rape.⁵ A study conducted by the Molly Rose Foundation⁶ in partnership with Revealing Reality found that over one third of 13-17 year olds had seen high-risk suicide, self-harm, depression, or eating disorder content in the previous week.⁷ This indicates that this type of content is common and persistent and is not rare. In the same survey 6% of 13-17 year olds saw content that encourages or promotes self-harm, and 8% saw content that normalises or glamorises self-harm beyond outright promotion and 12% had seen content that encourages or promotes eating disorders.⁷ <u>Priority Content</u>

⁴ Children’s Commissioner for England (2024) I’ve seen horrible things: Children’s experiences of the online world. Available at: <https://assets.childrenscommissioner.gov.uk/wpuploads/2024/10/Ive-seen-horrible-things-Online-Safety-Report-October-2024.pdf> (Accessed: 9 March 2026).

⁵ Children’s Commissioner for England (2025) ‘Sex is kind of broken now: children and pornography’. Available at: <https://www.childrenscommissioner.gov.uk/resource/sex-is-kind-of-broken-now-children-and-pornography/> (Accessed: 9 March 2026).

⁶ The fieldwork for the poll was undertaken in the weeks prior to the Protection of Children Codes coming into force.

⁷ Revealing Reality (2026) *Suicide, self-harm, depression and eating disorders: what children encounter online in a week*. Available at: <https://revealingreality.co.uk/suicide-self-harm-depression-and-eating-disorders-what-children-encounter-online-in-a-week/> (Accessed: 9 March 2026).

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	Bullying content continues to remain prevalent online. Online environments often exacerbate exposure to bullying and violent content. Data from the NSPCC demonstrates that between April 1 2024 and 31 March 2025, 3,300 counselling sessions were held when the main concern was an online related issue. 700 of these sessions were specifically about online bullying.⁸ In conversations with the NSPCC, young children suggested that AI has enabled the production of deepfake images and videos used for bullying or reputational damage.⁸ Children also struggled to avoid content that promoted discriminatory attitudes or relied on hurtful stereotypes with young boys pressurised into holding sexist beliefs.⁸ <u>Non-Designated Content</u> In the survey conducted by the Molly Rose Foundation and Revealing Reality, 17% of children aged 13-17 said they had seen content that makes feeling depressed seem normal, appealing, or cool.⁷
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 Not all young people face the same risk of harm online. Vulnerability, age, gender, can increase risk of harm.⁹ Research from the University of East London suggests that boys are more likely to see violent content, while girls are more likely to experience harassment and abuse.⁹ 4 in 10 girls report experiencing sexual harassment online because of their ethnicity.⁸ Exposure rates to high-risk suicide, self-harm, depression, or eating disorder content was also higher for girls, alongside children with Special Educational Needs and Disabilities (SEND), and those with low wellbeing.⁷ For instance, girls (20%) are more than three times as likely as boys (6%) to see eating disorder content.

⁸ NSPCC (2026) *The impact of harmful online content on children*. Available at: <https://learning.nspcc.org.uk/media/wmypc5cf/impact-harmful-online-content.pdf> (Accessed: 9 March 2026).

⁹ University of East London (2025) *The Child Online Harms Policy Think Tank: Launch Report*. Available at: <https://www.uel.ac.uk/sites/default/files/the-child-online-harms-policy-think-tank-launch-report-june-2025.pdf> (Accessed: 9 March 2026).

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	Some young people from minoritised groups informed the NSPCC that they were exposed to posts inciting hatred or disrespect against their identity and community.⁸ Boys were also more likely to have viewed pornography than girls (73% to 65%).⁸ The Office of the Children’s Commissioner has also outlined that younger children are more likely to feel unsafe online than older children.⁴ Additionally, children with Special Educational Needs and Disabilities (SEND) were less likely to feel safe online compared to those without SEND.⁹ Replicating other findings, young girls were also less likely to say that they felt safe online compared to young boys.⁹
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – N <u>Primary Priority Content</u> Research from 2022 conducted by The Centre for Countering Digital Hate using child avatar accounts on TikTok found that child’s accounts were shown harmful content every 39 seconds, with content referencing suicide appearing within 2.6 minutes and eating disorder content within eight minutes of creating the account.¹⁰ The Centre for Countering Digital Hate also conducted research into harmful eating disorder content on YouTube. Analysis of 100 YouTube video recommendations to UK 13 year olds showed that 1 in 4 were for harmful eating disorder content and over half were for content related to eating disorder or weight loss.¹¹ Of 23 harmful eating disorder videos that were flagged by researchers, YouTube failed to act on 17 of these.¹¹ An assessment of ChatGPT identified problems on this service. Researchers, pretending to be children sent

¹⁰ Center for Countering Digital Hate (CCDH) 2022, *Deadly by Design*. Available at: <https://counterhate.com/research/deadly-by-design/> (Accessed: 9 March 2026).

¹¹ Center for Countering Digital Hate (n.d.) *YouTube’s Anorexia Algorithm*. Available at: <https://counterhate.com/research/youtube-anorexia-algorithm-uk/> (Accessed: 9 March 2026).

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	prompts about mental health, eating disorders, and substance abuse to ChatGPT. Of these 1,200 prompts, ChatGPT generated harmful responses to 53% of prompts.¹² Of the 638 harmful responses, 297 contained follow up suggestions.¹¹ The platform is able to generate harmful responses within minutes of a teen initiating a conversation. It is our view that Generative AI must also be fully brought into the scope of the Online Safety Act, in particular to address the impacts of mental health disinformation and dangerous advice. This is also covered in other answers. The Children’s Commissioner identifies X (formerly Twitter) as the single biggest source of pornography, with 45% having seen pornographic content on the platform.⁵ Additionally, children using TikTok and X were twice as likely to encounter high-risk suicide, self-harm, depression, or eating disorder content compared with users of other platforms.⁷ Other research conducted has also set out that Instagram and TikTok are the highest-risk platforms for body-stigma/appearance pressure and Eating Disorder-adjacent content.¹³ <u>Priority Content</u> Young people have identified TikTok as a platform where they encounter racism, misogyny, and discriminatory content.¹⁴ A report from the Children’s Commissioner has also highlighted TikTok as a key route through which harmful challenges and dangerous viral trends spread.⁴ Instagram is cited as one of the platforms where children cite feeling unsafe, due to exposure to hate content.⁴ Moreover, the NSPCC also highlight that bullying is one

¹² Center for Countering Digital Hate (2025) *Fake Friend*. Available at: https://counterhate.com/wp-content/uploads/2025/08/Fake-Friend_CCDH_FINAL-12Sep.pdf (Accessed: 9 March 2026).

¹³ Saukko, P., Malson, H. & Brown, A. (2026) “‘It shows me mental health things ... and keeps spamming diets’: a qualitative, spatial perspective on how people with eating disorders experience algorithms shaping their movement across social media”, *Journal of Eating Disorders*, 14(40). Available at: <https://link.springer.com/article/10.1186/s40337-025-01514->

¹⁴ Mental Health Foundation (2025) Disturbing online content one of biggest looming threats to young people’s mental health. Available at: <https://www.mentalhealth.org.uk/about-us/news/disturbing-online-content-one-biggest-looming-threats-young-peoples-mental-health> (Accessed: 10 March 2026).

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	of the most frequent harms reported to Childline and is strongly associated with Instagram usage.¹⁵ The NSPCC has also outlined that violent and extremist content is sometimes shared in closed groups on Discord.¹⁵ WhatsApp has also been talked about as a place where bullying behaviours can occur.¹⁴ <u>Non-Designated Content</u> The Children’s Commissioner has found that teenagers are often targeted on Instagram, TikTok, and Snapchat with body-image related ads including weight loss treatments and skin lightening products.⁴ Instagram, Snapchat, and X (formerly Twitter) are also discussed as places where harmful content such as body-shaming is present.¹⁵ Research and lived experience has also identified TikTok, Instagram, Snapchat, Discord, and WhatsApp as areas where young people encounter self-harm, depression, and hopelessness-related content.^{4, 14}
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	Confidential? – N We have been pleased to see the initial action that has been taken against the most egregious suicide forum. A

¹⁵ NSPCC (2026) *The impact of harmful online content on children*. London: NSPCC Learning. Available at: <https://learning.nspcc.org.uk/research-resources/2026/impact-harmful-online-content-children> (Accessed: 10 March 2026).

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evidence concerning cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	2017 inquiry into suicides of young people found suicide-related internet use in 26% of deaths in under-20s.¹⁶ However, progress is more limited on tackling sites that encourage eating disorders and protecting children on some of the largest, household name sites. Social media can present an excessive quantity of content relating to specific topics that can damage users' mental health, including suicide, self-harm, and eating disorders. It can present idealised images of bodies, which can feed into young people's sense of their own body image.^{17,18} Our research has shown how harmful poor body image can be to young people's mental health, causing them to feel shame, anxiety, and even suicidal thoughts.¹⁴ Other research has found that higher body dissatisfaction is associated with a poorer quality of life and psychological distress,¹⁹ a higher likelihood of depression symptoms,^{20, 21} and the risk of unhealthy eating behaviours and eating disorders.^{22,23} Adolescence, in particular, is a critical period, when peer relationships are of increasing significance and importance. Concerns about body image

¹⁶ BBC News (n.d.) 'Failure to act' on suicide website linked to 50 UK deaths. Available at: <https://www.bbc.co.uk/news/uk-67082224> (Accessed: 5 March 2026).

¹⁷ Mental Health Foundation. *Body Image*. Mental Health Foundation; 2019. Accessed January 27, 2026. <https://www.mentalhealth.org.uk/explore-mental-health/articles/body-image-report-executive-summary>

¹⁸ Jackson KL, Janssen I, Appelhans BM, Kazlauskaite R, Karavolos K, Dugan SA, et al. Body image satisfaction and depression in midlife women: The Study of Women's Health Across the Nation (SWAN). *Arch Womens Ment Health*. 2014 Jun 13;17(3):177–87.

¹⁹ Griffiths S, Hay P, Mitchinson D, Mond J, McLean S, Rodgers B, et al. Sex differences in the relationships between body dissatisfaction, quality of life and psychological distress. *Aust N Z J Public Health*. 2016 Dec;40(6):518–22.

²⁰ Jackson KL, Janssen I, Appelhans BM, Kazlauskaite R, Karavolos K, Dugan SA, et al. Body image satisfaction and depression in midlife women: The Study of Women's Health Across the Nation (SWAN). *Arch Womens Ment Health*. 2014 Jun 13;17(3):177–87.

²¹ Goldschmidt AB, Wall M, Choo THJ, Becker C, Neumark-Sztainer D. Shared risk factors for mood-, eating-, and weight-related health outcomes. *Health Psychol*. 2016 Mar;35(3):245–52.

²² Smolak L, Levine MP. *Body Image, Disordered Eating and Eating Disorders: Connections and Disconnects*. In: Smolak L, Levine MP, editors. *The Wiley Handbook of Eating Disorders Assessment, Prevention, Treatment, Policy and Future Directions*. Chichester, UK: John Wiley & Sons, Ltd; 2015. p. 1–5.

²³ See written evidence submitted by the Centre for Appearance Research, University of the West of England, to the Women & Equalities Select Committee

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	often begin during this time; if these develop into negative feelings about one's body, they can then last a lifetime. All children are different and can experience different types of content as harmful. Whilst no children should be exposed to the most harmful content, they should also be empowered to choose whether, and under what circumstances, they are exposed to material that they find uncomfortable, as appropriate to their development stage. As part of our preparation for this consultation response, we also spoke to some young people from the Mental Health Foundation Young Leaders (MHFYL) network²⁴ about the type of content they considered damaging to their mental health.²⁵ They highlighted content such as extremely bad political situations, violence, racism, and homophobia as being damaging for their mental health. Additionally, they discussed the role of misinformation and AI videos, alongside the impact of influencers encouraging things like eating disorders, gore videos, and misogyny.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – N A review of 26 studies by European Psychiatry found that adolescents exposed to idealised body image content on social media platforms such as Instagram and TikTok experienced reduced self-esteem, higher levels of anxiety and depression, and greater body dissatisfaction.²⁶ Although both boys and girls can be harmed, the review finds that girls are more vulnerable to body dissatisfaction and show stronger internalisation of thin or idealised body standards. Moreover, their mental health is

²⁴ Mental Health Foundation Young Leaders are a diverse collective of young people from various backgrounds across the UK, who are keen to influence the ways in which the mental health and wellbeing of others can be protected. This is run in partnership between the Mental Health Foundation and Leaders Unlocked. More details can be found [here](#).

²⁵ Unpublished evidence from conversations between the Mental Health Foundation and the Mental Health Foundation Young Leaders. Available on request.

²⁶ Demetriou, M., Anagnostopoulou, V., Markatis, V., Peyioti, M. & Argitis, P. (2025) The impact of social media on adolescent body image: A comprehensive review. *European Psychiatry*, 68(S1). Available at: <https://www.cambridge.org/core/journals/european-psychiatry/article/impact-of-social-media-on-adolescent-body-image-a-comprehensive-review/C6D67875BB177DEB23C6C0566926811D> (Accessed: 9 March 2026)

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	more likely to be negatively affected by appearance-focused content. ¹⁹
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 In our previous answer we identified how some young people from minoritised groups were exposed to posts inciting hatred or disrespect against their identity and community. Besides feeling hurt, some described feeling unsafe and scared that they would come across similar content again.⁷
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? – N We would strongly argue against any kind of PPC or PC in the Act being de-categorised.
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – N As with our above answer, we would strongly argue against any kind of PPC being categorised at a lower level. This content is some of the most egregious and dangerous, and the greatest possible protections are needed against these for children and young people.
Any kind of PC would be more appropriately categorised as PPC.	We would argue that all categorised PC content represents a risk to children’s mental health. We would therefore advocate the PC category being removed, and all of the content currently listed in this content being moved

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	to the PPC category. This would provide an additional layer of protection for children and young people. Young people we asked from MHFYL specifically called for content which is abusive and incites hatred and content that promotes violence to be moved into PPC.²⁷
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:	We believe that journalistic material related to war and climate change, and material which might impact an individual's perception of their own body should be added to the PPC content list. The NSPCC has revealed how young people would often look for support after watching violent or distressing scenes, including from news reports shared on social media. Some mentioned being fixated on what they saw, thinking obsessively or having intrusive and persistent thoughts that impacted their daily lives.⁴ We would also encourage Ofcom to consider the impact of misleading information. This has the potential to affect the mental health of children, influencing their worldview and leaving them feeling confused or overwhelmed.⁷ 27% of children say they have believed a fake or AI generated news story.²⁸ This can leave children feeling embarrassed, confused, or less trusting in the news. Vulnerable children report greater feelings of worry and are more likely to fall for fake or generated AI content.²¹ We also asked young people from the MHFYL's if there is any content that is missing or needs to be added to the primary priority content list or the primary content list. They highlighted animal abuse and deep fakes as areas not covered, and that should be added to PPC. In addition, they advocated for harmful and false AI content, harmful and fake political content, and any content related to cults to be included in PC.²⁹

²⁷ Unpublished evidence from conversations between the Mental Health Foundation and the Mental Health Foundation Young Leaders. Available on request.

²⁸ Internet Matters (n.d.) The impact of online news on children's wellbeing. Available at: <https://www.internetmatters.org/hub/research/impact-online-news-childrens-wellbeing/> (Accessed: 9 March 2026).

²⁹ Unpublished evidence from conversations between the Mental Health Foundation and the Mental Health Foundation Young Leaders. Available on request.

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Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – N Polling conducted for Internet Matters outlined that 61% of children who consume news on social media say they have seen a story that has worried or upset them in the past month.²⁸ 47% of children and young people also say that seeing news content on social media gives them new problems to think about with many feeling overwhelmed.²⁸ The Children’s Commissioner has also documented how children can experience anxiety, fear, and overwhelm from seeing distressing news.⁴
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – N We would direct you to our previous answer.
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – N The Mental Health Foundation does not have any evidence for this question.

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
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- ☐ Somebody told me or shared it with me
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