

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:	Confidential? No Since our previous submission, a new briefing has been published on NSPCC Learning which provides insight into contacts to Childline from children and young people regarding online harms.¹ This predates the implementation of the Protection of Children Codes of Practice but still provides important evidence from children and young people which should inform Ofcom's report. In summary, Childline delivered over 3,300 counselling sessions where the young person's main concern was an online related issue in 2024/25. While most of these were about online sexual abuse and exploitation, almost 900 were about other online harm and safety topics and almost 700 more were about online bullying. The briefing highlights that children in minoritised groups have been impacted by these harms because of their identity, including LGBTQ+ children, children in immigrant families, and children from different religious groups. For all children, risk was present across a range of service types. We would particularly highlight the widespread use of group chats for bullying and harassment, and the facilitate of harms through generative-AI – two issues which have been under-addressed in Ofcom's work to date. Children describe a range of impacts from this online harm. Often, young people described their frustration and anger with what they were seeing and the behaviour of others online, which caused them distress and upset. In other cases, particularly in cases of bullying and harassment, children were scared for their safety online, as well as their physical safety. Some children felt highly isolated after these experiences and like they had nowhere to reach for support.
The quantity, prevalence or presence of specific kind(s) of PPC, PC or NDC	-

¹ NSPCC (2026) [The impact of harmful online content on children](#).

Question	Your response
on regulated services and the frequency with which children are encountering this content.	
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.	-
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? No Services which are designed to drive high and prolonged engagement from users drive exposure to PPC, PC, and NDC, as well as other types of harm. Children often highlight indirect mechanisms for harm whereby excessive screentime reduces time for other activities and subsequently their wellbeing. This includes being online late at night leading to worse quality sleep and online activity displacing study and exercise. However, addictive design online can also lead to direct harms for children. This can be seen in cases such as personalised algorithms delivering increasingly extreme content to users, network expansion prompts encouraging children to connect with possibly unsafe individuals, and social metrics like interaction ‘streaks’ incentivising users to continue unhealthy or abusive contact. It is critical that the definitions of harmful content, and Ofcom’s approach to addressing them, thoroughly considers how dark design patterns can drive increased exposure to harmful content and contact for child users.

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	“With everything going on in the world all I can think about is politics. My social media algorithm keeps showing me all this right-wing stuff. I don’t know what to believe because I agree with some of the things my feed is showing me, but it also shows me a lot of hate and really extreme views. I even deleted social media to get away from it and reset my algorithm, but it all comes back when I redownload it again” -Young person, Childline² “How can I stop being addicted to social media? I’m not even sure what keeps me coming back to my phone, I can’t even go on social media without feeling negative. Things like YouTube are so easy to watch, I find singers and dancers I like, but I always end up on the negative side of the apps” -Girl, 12, Childline “I know she’s not actually a friend to me, she says so many nasty things to me, especially about how I look. How can I stop speaking to her though when I see her every day in school and I’d lose my biggest TikTok and Snap streaks” -Girl, 14, Childline
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:	-

² Snapshots are based on real Childline service users but are not direct quotes. All names and potentially identifying details have been changed to protect the identity of the child or young person involved. We cannot guarantee that an online platform has not made relevant changes to their processes since a child described their worry to Childline. This applies to all snapshots in this briefing.

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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.	-
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	-
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.	-
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:	Confidential? No An area of categorisation which requires further clarification, is the overlap between content types. For example, the difference between eating disorder content and body stigma content is both subjective and context dependent. One piece of body stigma content is unlikely to trigger disordered eating or behaviours; the cumulative impact of being repeatedly exposed to body stigma content could. Contacts to Childline highlight that it is not simply specific eating disorder content such as eating disorder subliminals and restrictive meal plans that result in harm. Intentionally or unintentionally encountering 'thinspo', trends ridiculing fatness or a lack of muscle, particularly when this is a repeated message, can have the same impact as eating disorder content on children: encouraging negative body image, distorted perceptions and unhealthy attempts at body modification.

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	“Sometimes I see thinspo girls on Insta and it makes me want to have an eating disorder, which I know is terrible but some of them just look so perfect and it’s what I want to look like.” - Girl, 15, Childline Given this high degree of overlap, and the cumulative impact of body stigma content, we recommend that it is recategorised from NDC to PC. This would better reflect the reality that pervasive body stigma content, and even body idealisation content, can lead to similar impacts as primary priority eating disorder content. There is also a strong case that could be made for specific types of PC, such as content which is abusive or incites hatred, to be categorised as PPC. From Childline we hear the strong negative impacts that this content can have on children, shaping how safe they feel on and offline. “I’m really worried about the stuff I’m reading about Pridefall. Apparently, it’s this thing where some people are sending hate towards the LGBTQ+ community on social media, like sending rude messages and videos of people being raped. As a member of the LGBTQ+ community myself, I’m petrified. I don’t want to be clicking on links that will tell people where I live so then they can come and kill me or something.” - Girl, 11, Childline Given Ofcom’s recent analysis of platform risk assessments,³ it appears unlikely that platforms are currently delivering the required level of age-based consideration essential for effectively delivering PC protections. If platforms are not robustly protecting younger children from encountering PC, then it may be appropriate to consider recategorisation of content as PPC. If this were to be the case, it would be crucial to consider possible unintended consequences like the over-moderation of content preventing young people from learning about political topics which attract hateful and abusive content. Similarly, it is important that cliff-edges are not created, with no exposure to harmful content under the age of 18 changing to intense exposure after this age. Therefore, our preference would be the strong regulation and quality assur-

³ Ofcom (2025) [Year 1 Online Safety Risk Assessments Report on standards and improvements](#)

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	ance of service implementation of PC categorisation before seeing moves to upgrade significant numbers of categories to PPC. Ofcom must also ensure that services are live to the significant degree of overlap between content types, particularly when they are from different tiers of harm. Suicide content (PPC) and harmful substances content (PC) can significantly intersect; it is important that services are reliably flagging harmful substances content that could also be considered suicide content as PPC, not PC. If services are unable to demonstrate robust identification of where harmful substances content can be used to encourage, inform or assist self-harm or suicide, Ofcom should consider recategorising harmful substances content as a form of PPC.
Any kind of PPC or PC in the Act should cease to be categorised as content harmful to children.	-
Any kind of PPC would be more appropriately categorised as PC.	-
Any kind of PC would be more appropriately categorised as PPC.	See above
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:	Confidential? No <u>Additions to the content harmful to children typology</u> <u>Sexualised content</u> Pornography is rightly classified as PPC under the current classification; it should not enter children's feeds. While it is appropriate that pornography is recognised as a distinct category, it is also necessary to consider the content that falls just outside the threshold of pornography: sexualised content. This content, not produced 'solely or principally' for sexual arousal, may allude to sex and sexualise images or text to facilitate an aim other than arousal.⁴ While less explicit, this content can be confusing or overwhelming for young people.

⁴ Culture Reframed (2024) [Sexualization, social media, and video gaming](#)

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	“I can’t decide if the website was bad or not, it just seemed creepy. I’m just really confused on the laws around pictures like this. My mum said they weren’t likely to be reported to the police because they weren’t explicit enough. I’ve tried researching the laws on this stuff but it doesn’t make sense to me. It feels like nothing gets removed unless it’s really serious and that can’t be okay.” - Boy, Childline⁵ One-off or irregular exposure to sexualised content online is unlikely to lead to direct harm to children. However, it is important to recognise the possible cumulative impact of repeated exposure, especially for younger children. Evidence on the impact of this content on children, suggests links between increased exposure to sexualised content and mental health problems - particularly body image issues among girls.^{6, 7, 8} “It [the sexualization of females on Instagram] just sends the message that you’re nothing but your body, so that’s everything about you, that’s the most important thing when really it’s not.” - Girl, 14, research⁹ This is confirmed by qualitative research with children, who report that sexualised content is normalised among older cohorts and can result in confusion or overwhelm for younger children.¹⁰ The appropriateness of encountering sexualised content is heavily modified by the age and stage of development of children. Preventing children from any access to this content, especially older

⁵ Snapshots are based on real Childline service users but are not direct quotes. All names and potentially identifying details have been changed to protect the identity of the child or young person involved. We cannot guarantee that an online platform has not made relevant changes to their processes since a child described their worry to Childline. This applies to all snapshots in this briefing.

⁶ Zurbriggen et al (2007) [Report of the APA Task Force on the Sexualization of Girls](#)

⁷ Skowronski (2021) [Predicting Adolescents’ Self-Objectification from Sexualized Video Game and Instagram Use: A Longitudinal Study](#)

⁸ Slater and Tiggemann (2016) [Little girls in a grown up world: Exposure to sexualized media, internalization of sexualization messages, and body image in 6-9 year-old girls](#)

⁹ Papageorgiou et al (2023) [“It just Sends the Message that you’re Nothing but your body” a Qualitative Exploration of Adolescent Girls’ Perceptions of Sexualized Images on Social Media](#)

¹⁰ Papageorgiou et al (2023) [“It just Sends the Message that you’re Nothing but your body” a Qualitative Exploration of Adolescent Girls’ Perceptions of Sexualized Images on Social Media](#)

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	children, would be overly restrictive. However, younger teens and pre-teens should not have to operate in online worlds saturated in sexualised content. Such environments risk shaping their views on important, sensitive topics like sexuality, bodies and healthy relationships, without access to supportive adults and opportunities for critical thinking. Given these considerations, we recommend the creation of an additional category of NDC, sexualised content, to protect young children from being fed excessive amounts of this material. <u>Mis and disinformation</u> Another form of legal content frequently reported via Childline as causing harm is mis and disinformation - hereafter referred to as misinformation.¹¹ Misinformation takes many forms, some of which are addressed by existing content categories such as bullying content. Types inadequately addressed in the current classification include misinformation that predicts or claims ensuing catastrophic events, intended to cause fear and distress. Examples of the impact of this content on children are detailed below. “I was looking on tiktok the other day and saw that a climate clock has been built and it’s displaying six years. Obviously people on tiktok tend to over exaggerate so I’m not sure what’s true. My main worry is that no one knows what will happen when the clock hits zero and it’s that thought that’s really scaring me. My brain also can’t seem to comprehend it all and just someone mentioning it makes me start having a panic attack.” -Girl, 14, Childline “I don’t know if it’s fake news but I saw that the UK and US have threatened war with Russia, and Russia said that they will kill everyone and really horrible things... I’m really scared.”- Girl, 12, Childline “I’ve seen an AI video showing the end of the world and now I’m scared. My anxiety has been getting bad; I’ve been having panic attacks and trouble sleeping. I have tried things to calm down, but I can’t. I don’t know what to do.” -Young person, Childline

¹¹ NSPCC (2026) [The impact of harmful online content on children](#)

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	As well as impacting children's views of specific people and events, misperceptions gained from online content can cause harm to children by altering their wider world view. This presents in numerous ways, including young people developing extremist views, becoming enmeshed in conspiracy theories or no longer valuing facts and truth. "I was worried about my mortality, basically what happens after death and started reading lots of different opinions online. I got onto conspiracy theories and talking to people saying World War III is definitely breaking out this year. They think we need it, and we'll be resurrected in another universe. I don't know what to think anymore, what's a prediction and what's propaganda?" -Young person, 12, Childline "Everyone's too judgemental about everything when really everyone is allowed to have opinions. I get all my information online and I put it together from lots of different places but mostly YouTube. I know some of it isn't factual, but I don't even think that matters? The woke media makes things up and sometimes you can't risk it if someone's theory is true, you know? You can be popular and successful and viral and make lots of money without sticking to the facts" -Young person, Childline Misinformation shared at volume can also lead to harms that overlap with existing categories of PC, such as content which incites hatred. This can be seen clearly in the social media response to the Southport Attack in Summer 2024, where false claims that the attacker was an immigrant were spread widely.¹² Under the current categorisation, simple modifications to content making this claim, such as removing direct reference to discriminatory conclusions about migrants, would result in such content no longer being considered hateful and therefore a type of PC. False claims could 'legitimately' be pushed to child audiences and, if delivered in large quantities, hold power to incite hatred. This is a clear gap in the current categorisation which should be addressed.

¹² Full Fact (2025) [Full Fact Report 2025](#)

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	We recognise the challenges with preventing exposure to misinformation, particularly when considering the importance of users’ rights to free expression. However, there is a duty to consider the short- and long-term impact that excessive exposure to disinformation can cause for children, including distress, hatred and social isolation. Consequently, we recommend that where mis or disinformation content is established as such, it should be classified as a form of NDC, with platforms held accountable for protecting children from excessive exposure. <u>Emotional dependence</u> A further uncategorised form of content that can damage children’s perception of reality is the anthropomorphic interactions of AI chatbots. Designed to appeal to users, the human-like communication adopted by AI chatbots can foster strong emotional connections between user and chatbot, leading to emotional dependence, trust and deference. This can be particularly dangerous for younger children who have less developed critical thinking skills, scepticism, and may be more susceptible to developing parasocial relationships.^{13, 14} Research by Internet Matters¹⁵ highlights the prevalence of this issue, with 35% of children who use chatbots saying it feels like talking to a friend, a figure that rises to 50% among vulnerable children. Meanwhile, six in ten parents are worried that their child believes their AI chatbot is a real person. As the Government acknowledges, “emotional dependence is an emerging harm related to chatbots”¹⁶ and one that appears to be growing as both uptake of AI, and refinement of AI model’s human mimicry, progress. This human-like relationship and emotional dependence on AI chatbots can result in numerous harms for young people.¹⁷ These include: a withdrawal from social interactions, chatbots reinforcing and exacerbating mental

¹³ Maples et al (2024) [Loneliness and suicide mitigation for students using GPT3-enabled chatbots](#)

¹⁴ Common Sense Media (2025) [Talk, Trust, and Trade-Offs: How and Why Teens Use AI Companions](#)

¹⁵ Internet Matters (2025) [Me, myself and AI: Understanding and safeguarding children’s use of AI chatbots](#)

¹⁶ DSIT (2026) [Growing up in the online world: a national consultation](#) p36

¹⁷ Kurian (2024) [‘No, Alexa, no!’: designing child-safe AI and protecting children from the risks of the ‘empathy gap’ in large language models](#)

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	health problems and increased difficulty trusting human interactions. “I know it’s excessive and unhealthy how much I chat to AI bots and mindlessly scroll through videos. I just don’t feel connected to anyone or find anything else fun anymore” - Boy, 14, Childline “I recently started college and noticed all the girls wore fake tan and just put more effort into their appearance. I didn’t want to be the odd one out, so I started changing how I looked. I instantly got compliments and found people really gravitated towards me. It was from here that I think I became obsessed. I would spend ages asking AI to analyse what I looked like. It got to the point where I wouldn’t leave the house if the app rated me at a low score. I’ve always been self-conscious growing up, but now I think I might have a problem. I don’t know what to do about it.”- Girl, 17, Childline “Can I ask questions about ChatGPT? Like how accurate is it? I was having a conversation with it and asking questions, and it told me I might have anxiety or depression. It’s made me start thinking that I might?”- Girl, 12, Childline The tragic case of 14-year-old Sewell Setzer III, who took his own life following encouragement from his AI chatbot to ‘come home’, highlights the potentially devastating impacts chatbots can have on children.¹⁸ As well as encouraging a withdrawal from or replacement of human sources of support, emotional dependence on AI chatbots can also make young people more suspicious of human support accessed virtually. Childline practitioners increasingly report young people questioning if they are talking to a human or an AI chatbot during online contacts. When emotional dependence on AI has consequences for children’s trust in support services, this can lead to real harm.

¹⁸ New York Post (2024) [Boy, 14, fell in love with ‘Game of Thrones’ chatbot — then killed himself after AI app told him to ‘come home’ to ‘her’](#)

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	Given live discussions concerning how AI chatbots are addressed under the Online Safety Act, it may not be appropriate to add emotional dependence as PC. However, there are few drawbacks or barriers to including emotional dependence on AI as a form of NDC. Adding AI emotional dependence as NDC would signal to developers that this is an area of increasing concern and scrutiny by the regulator, helping them to prepare for possible upgrades to the harm type in coming years.
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	-
Evidence that the kind(s) of content pose a risk of significant harm to children.	-
Evidence to support each kind of content being categorised as either PPC or PC.	-

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