

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 evidence presented here is based on the data collected as part of the 2025 Young Life and Times (YLT) survey. YLT is large scale social attitude survey of a nationally representative sample of 16-year-olds undertaken annually in Northern Ireland since 2003. The 2025 survey included a set of questions on 16-year-olds' experiences of adverse and criminal behaviours on social media. Headline results are freely available here. The dataset is also freely available as is a detailed technical report of the survey. We produced a separate report on the social media data, which can be found here. Our responses below are based on the findings included in this report.
The quantity, prevalence or presence of specific kind(s) of PPC, PC or NDC on regulated services and the frequency with which children are encountering this content.	Confidential? –N Over half (54%) of a nationally representative sample of 16-year-olds in Northern Ireland reported that they had experienced at last one type of illegal and/or harmful behaviour on social media. More specifically, they reported experiencing the following types of illegal and/or harmful behaviours on social media: - Someone posting/sharing material which they found offensive, indecent or obscene: 26% - Someone sharing their information, photos, videos with others without their consent: 21% - Someone stalking their activities 20% - Someone attempting to build a relationship with them to try to manipulate them: 13% - Someone posting/sharing material motivated by hostility/dislike towards their race, religion, sexual orientation, disability, gender 12%

Question	Your response
	- Someone posting/sharing threatening, intimidation or harassing material about or towards them: 11% - Offers to buy or sell illegal or stolen goods: 11% - Blackmail: 9% - People deliberately being dishonest to them to obtain a financial/personal benefit or cause them to lose something: 9% - Someone using their information on social media to hack into their accounts: 8% - Someone using their information on social media to steal their identity 4% Several of the 16-year-olds reported experiencing more than one type of illegal and/or harmful behaviour on social media. For examine: - 19% reported experiencing only one type of the behaviours listed above - 11% reported experiencing two of the different types of behaviours listed above - 9% reported experiencing three of the different types of behaviours listed above. - 15% experienced four or more different types of the behaviours listed above
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 We found statistically significant differences between different groups of survey respondents. - Females (43%) were less likely than males (49%) to state that they had NEVER experienced any of these behaviours. - Those from financially well-off family backgrounds and average well-off backgrounds were more likely than those from not-well-off backgrounds to say they had NEVER experienced any of these behaviours (48%, 45% 35% respectively) - Those with a disability or long-term illness (32%) were less likely to say they had NEVER experienced any of these behaviours compared to those with no disability or long-term illness (48%).

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	- Opposite-sex-attracted 16-year-olds (50%) were more than twice as likely as same-sex-attracted 16-year-olds (24%) to say that they had NEVER experienced any of these behaviours. - Same-sex-attracted young people and those with a disability or long-term illness reported statistically significantly higher prevalence of experiencing all of the different types of harmful or illegal behaviours on social media examined in this research. - Non-white 16-year-olds (19%) and those who self-identified as belonging to a minority-ethnic group (17%) were more likely than white 16-year olds (12%) and those did not self-identify as belonging to a minority ethnic group (12%) to say that they -had been at the receiving end of posting/sharing material motivated by hostility/dislike towards their race, religion, sexual orientation, disability, gender. - White 16-year-olds (12%) were more likely than non-white 16-year-olds (6%) to say that someone had offered them to buy or sell illegal or stolen goods.
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? / N Respondents to the YLT survey highlighted that illegal and harmful behaviour can occur on all social media platforms. However, Snapchat was mentioned the most in the survey as a social media app in which illegal and/or harmful behaviours frequently occurred, including but not limited to the sharing of material without consent, bullying, the sharing of inappropriate/obscene content, blackmail, stalking, threatening behaviour, grooming, the selling of illegal goods and fraud. The perception and experience among 16-year-olds was that apps that had features that gave a sense of privacy and protection, gave easy access to accounts, and which had features that made it easy to share pictures, videos and location data were most likely to be used for harmful or illegal behaviour. <i>"I think behaviours such as these are more likely to happen on social media platforms like, TikTok, Snapchat, and Instagram, because strangers and people you know</i>

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	<i>have easy access to your account and it is more accepted on those platforms."</i> Whilst comments in the survey were left about Instagram, TikTok and other apps, where illegal and harmful behaviour could occur, Snapchat was identified as the most likely app where this could happen, due to its design features and popularity. The following quotes are indicative of these experiences: <i>"Snapchat is probably the worst for most things, as it's extremely easy to share personal information/pictures about someone to anyone as it is so easy to spread things in Snapchat."</i> <i>"Snapchat is inherently designed to support shady activity, such as sending nude photos of yourself to people, due to the fact that unlike other texting apps, images immediately delete upon the recipient seeing it."</i> <i>"Well Snapchat, for example, you can Snap pictures and send them to people which they can save, which then they could sell. Instagram as well. You can post pictures of people on your stories making them feel unsafe. Some apps don't have restrictions which could make people feel unsafe in some situations."</i> <i>"Snapchat is used for bullying and group chats are made to bully someone because they may think it is funny."</i>
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,	

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PC or NDC. Please provide as much detail as you can. This could include but is not limited to evidence about:	
The impact that specific kind(s) of PPC, PC or NDC can have on a child's wellbeing, behaviours, or other physical or psychological outcomes. This might include evidence concerning cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	Confidential? – N We found a very strong relationship between poor mental health and the experience of illegal and/or harmful behaviour on social media. Mental health was measured in two ways: 1) using the standardised 12-item version of the General Health Questionnaire (GHQ-12). The GHQ-12 is a screening instrument for non-psychotic psychiatric disorder and is based on answers to questions about 12 symptoms, such as concentration, sleep loss due to worry, anxiety, loss of confidence and general happiness, experienced by respondents in the previous few weeks. We use the established 'caseness' to analyse the findings. For this, the scores to all 12 questions are used to identify respondents who have, or are at risk of developing, a psychiatric disorder – here we use the plain English term 'poor mental health'. 2) We also asked respondents to self-assess their mental health. The 2025 YLT survey found that 33% of those who said they had never experienced any illegal and/or harmful behaviours on social media were GHQ-12 cases, compared to 56% of respondents who had experienced at least one of those behaviours listed above. The results for self-assessed mental health were similar. 45% of 16-year-old who stated they had never experienced any illegal and/or harmful behaviour on social media reported that their mental health was 'excellent' or 'very good'. This compares with 23% of those who had experienced at least one of the above illegal and/or harmful behaviours. 16% of these 16-year olds assessed their mental health to be 'poor' compared to just 4% of those who had never experienced any of the illegal and/or harmful behaviours on social media. Some of the illegal and/or harmful behaviours experienced on social media were more strongly associated with poor mental health than others. The percentage points below indicate the proportion of 16-year-olds who experienced these behaviours and said their mental health was 'poor' (1st figure) and who were considered

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	to be GHQ-12 cases, i.e. having, or being at risk of, developing a psychiatric disorder (2nd figure) - Someone attempting to build a relationship with them to try to manipulate them: 27%; 72% - Someone posting/sharing material motivated by hostility/dislike towards their race, religion, sexual orientation, disability, gender 26%; 66% - Someone posting/sharing threatening, intimidation or harassing material about or towards them: 25%; 70% - Someone posting/sharing material which they found offensive, indecent or obscene: 24%; 64% - Someone using their information on social media to steal their identity 24%; 59% - Someone stalking their activities 23%; 66% - Offers to buy or sell illegal or stolen goods: 21%; 61% - People deliberately being dishonest to them to obtain a financial/personal benefit or cause them to lose something: 20%; 56% - Someone sharing their information, photos, videos with others without their consent: 20%; 60% - Someone using their information on social media to hack into their accounts: 18%; 59% - Blackmail: 18%; 61% The large difference between self-assessed 'poor' mental health and the GHQ-12 'caseness' measure would be much reduced if those who considered their mental health to be 'fair' had been added to those who said it was 'poor'.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? –N Whilst the data above show a relationship between exposure to illegal and/or harmful behaviour on social media with poor mental health, it is not possible to make claims about causality as the survey was cross-sectional in nature. However, we did find that there was a very strong relationship between long hours spent on social media and poor mental health. 16% of those who said they never spent any time on social media were GHQ-12 cases compared to 59% of those who said they spent eight hours or more daily on social media. Again, while it is not possible to prove causality from this research, the

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	results indicate that long hours spent on social media may increase the likelihood of experiencing illegal and/or harmful behaviours on social media, and this is related to poor mental health
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 As stated, the 2025 YLT survey shows that particular demographics (i.e. females, same-sex-attracted young people; young people with a disability or long-term illness; and, in relation to certain experiences, young people who are non-white or a member of a minority ethnic group) are more likely to be exposed to illegal and/or harmful behaviours on social media. There is an interaction effect of these characteristics that exacerbate poor outcomes. For example in our survey, among opposite-sex-attracted males who reported exposure to one or more of the illegal and/or harmful behaviours 39% were GHQ12 cases. This compares with 56% of same-sex-attracted males; 61% of opposite-sex-attracted females and 72% of same-sex-attracted females. So this means that same-sex-attracted females who experienced illegal and/or harmful behaviours on social media are almost twice as likely to have poor mental health as opposite-sex-attracted males who had these experiences. Much larger UK-wide studies with larger sample sizes would be required to evidence this clearly for categories such as race, disability, our sample is too small for this.
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:	

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Any kind of PPC or PC in the Act should cease to be categorised as content harmful to children.	Confidential? – N No contribution to make
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – N No contribution to make
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – N No contribution to make
We invite stakeholders to provide evidence in support of additional kind(s) of content being added to the PPC or PC categories in the Act. This should include, but is not limited to:	
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – N No contribution to make
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – N No contribution to make
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – N No contribution to make

Please tell us how you came across about this call for evidence.

- ☒ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

Please complete this form in full and return to ContentHarmfultoChildren@ofcom.org.uk.