

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.	Confidential? – N IWF, ChildLight, NSPCC data indicates that Primary Priority Content (PPC) and Priority Content (PC) are encountered by children through a combination of regulated services and device-native vectors. While regulated user-to-user services are a significant source of exposure (particularly for pornographic content, bullying content, and violent content), data suggests that a meaningful proportion of harmful content is subsequently stored, reshared, or encountered beyond the original regulated environment. This includes: • Screen-recorded or downloaded pornographic and illegal content

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	• Self-harm and suicide content accessed via search and saved locally • Peer-to-peer redistribution of explicit and illegal imagery • Sexually explicit content captured and re-shared outside the originating service As a result, incidence measured solely at the platform layer may understate the total exposure experienced and self-generated by children. Children experience content harm as an ecosystem, not as isolated platform events.
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 Our experience suggests that demographic characteristics materially influence both exposure likelihood and content type: • Girls are disproportionately exposed to eating disorder content, body stigma content, and coercive image-sharing dynamics and become desensitised to it...normalising harmful behaviours. • Boys are more frequently exposed to sexually explicit, violent and dangerous stunt content. • LGBTQ+ young people face elevated exposure to abusive and hateful content. • Younger children (pre-teens) are increasingly encountering pornographic content via peer sharing rather than active search. • Children with SEN, autism, looked after children are targeted for sexual exploitation. Importantly, vulnerable cohorts often encounter harmful content through private or semi-private channels (direct messaging, small-group sharing, or device-native transfer), reducing visibility and increasing risk severity.

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The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – N Children encounter harmful content across: • Large user-to-user social media platforms • Encrypted messaging services • Search engines and browser environments • Live streaming environments However, our evidence indicates that the original point of exposure is frequently not the final point of harm. Content often migrates beyond the regulated service via: • Downloading and local storage • Screenshotting and screen recording • Peer-to-peer transfer (including device-native sharing mechanisms) • Re-sharing across multiple platforms • AI-Gen manipulation Therefore, a comprehensive understanding of incidence requires consideration of how content moves across and beyond regulated services.
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:	

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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.	The severity of harm is influenced not only by content type but by delivery vector and context of exposure. We observe heightened severity where content is: • Repeatedly reshared beyond the original platform • Stored locally and used for coercion or blackmail • Encountered privately without reporting mechanisms • Consumed cumulatively over time For example: • Pornographic content encountered at younger ages correlates with distorted relational expectations and normalisation of violent sexual behaviour. • Suicide and self-harm content can reinforce ideation where exposure is repeated and unmoderated. • Bullying content escalates in severity when redistributed privately, increasing social isolation and reputational harm. Children do not experience these harms in isolation; cumulative exposure across services and storage environments significantly amplifies impact.
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – N Evidence from academic literature and safeguarding practice indicates causal links between: • Exposure to suicide content and increased ideation in vulnerable adolescents • Repeated exposure to eating disorder content and disordered eating behaviours • Non-consensual image sharing and long-term psychological distress • Sustained bullying exposure and anxiety, depression, and school avoidance

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	Where content persists beyond regulated environments and remains accessible at the device level, opportunities for intervention are reduced, potentially increasing duration and severity of harm. Harmful “content” is sexualising a generation. It is taking their innocence. A proportion are growing up with an appetite for violent pornography and CSAM, and a proportion of them go on to sexually abuse children in real life. (See IJM Scale of Harms Report).
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 Severity is heightened among: • Younger children lacking contextual literacy • Neurodivergent children who may interpret harmful content more literally • Children with existing mental health vulnerabilities • Girls experiencing image-based abuse or body stigma content • LGBTQ+ children facing targeted hateful abuse Private or peer-to-peer redistribution increases power imbalance and coercion risk, particularly for girls and vulnerable adolescents.
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	

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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 In addition to existing categories, Ofcom may wish to consider: 1. Coercive image-based exploitation content (including threats to distribute images). 2. Algorithmically amplified body comparison content where cumulative exposure drives harm. 3. Content that facilitates grooming pathways without being explicitly pornographic. We also encourage consideration not only of content typology but of delivery mechanisms. Children’s exposure risk is shaped not only by what content is, but by how and where it is encountered.
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – N
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – Y / N
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? – Y / N

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Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – Y / N
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – Y / N

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.