

Your response

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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:	NA
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.	NA Confidential? – No
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? – No *note: I have hyperlinked the evidence outputs in each of their first iterations* Our work has identified demographic differentiation in wellbeing outcomes and vulnerability and gendered pathway narratives, which may be relevant to understanding differential exposure and impact even where exposure measures were not quantified in our work: • UK subgroup differences in positive wellbeing outcomes by functional difficulty and anxiety/depression frequency (Connected Childhoods, p. 63.) • Girls face body-image pressures amplified by algorithmic feeds • Girls more likely to encounter gender-based online abuse • Boys' exposure to violent/misogynistic content including pornography may shape harmful attitudes (Click/Scroll/Connect, pp. 20–21.)

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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? – No Whilst the outputs do not identify named regulated services where children most likely encounter each kind of harmful content they do consistently illustrate the types of services and functionalities as key exposure pathways, including: • Social media and content sharing platforms as dissemination routes for harmful/age-inappropriate material including glorification of violence and hate speech (Protection Through Empowerment, p. 4.) • Algorithmic recommender systems and engagement maximising designs both of which can drive exposure to harmful material and escalate to more extreme content (Click/Scroll/Connect, p. 20; Protection Through Empowerment, pp. 8–10; Connected Childhoods, p. 7.) • Recommendation features are seen as pathways for violent content exposure. See White Paper survey summary (Protection Through Empowerment, p. 4.)
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:	NA
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	Confidential? – No Connected Childhoods highlights UK-relevant survey evidence of widespread challenges with digital wellbeing outcomes:

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cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	• In the UK, only 29% reported positive wellbeing experiences online, while 71% scored moderate or low (Connected Childhoods, p. 63.) • Across the nine-country sample, digital wellbeing outcomes were the weakest indicator with only 26% achieved good/high wellbeing scores and 30% agreed being online often left them stressed/upset • 45% reported FOMO • 40% worried about cyberbullying (Connected Childhoods, p. 28.) Click/Scroll/Connect and Protection Through Empowerment provide an explanatory account of severity mechanisms consistent with cumulative exposure - addictive design features (autoplay, infinite scroll) and recommender systems can intensify and prolong exposure - algorithmic feeds may learn and amplify a child's interests and push more extreme content that can harm self-esteem as described in an expert interview summary (Click/Scroll/Connect, pp. 19–20; Protection Through Empowerment, pp. 8–10.) Additionally, Click/Scroll/Connect includes a child-study example (Romania) where cyberbullying victimisation is associated with concentration difficulties, anxiety about school, nightmares and thoughts about self-harm, illustrating potential severity outcomes even though it is not UK-based. (Click/Scroll/Connect, p. 19.)
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	NA Confidential? – No
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	Confidential? – No Connected Childhoods provides UK subgroup evidence indicating unequal severity and vulnerability patterns: • Among UK respondents with functional difficulties, positive wellbeing outcomes were lower (24% vs 38% good/high) and management scores

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encountering specific kind(s) of PPC, PC or NDC.	were lower (24% vs 39% good/high) (Connected Childhoods, p. 63.) • Among UK respondents experiencing anxiety or depression monthly or more frequently, wellbeing outcomes were worse (13% low vs 4%; 19% good/high vs 40%) (Connected Childhoods, p. 63.) Click/Scroll/Connect provides further non-UK gendered severity narratives where: - girls face body-image pressures exacerbated by algorithms - girls more likely to encounter gender-based abuse and exposure to degrading or violent pornography - boys' exposure to violent and misogynistic content may normalise aggression/objectification, - harms likely to be underreported due to stigma and masculinity norms (Click/Scroll/Connect, pp. 20–21.)
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.	NA Confidential? – No
Any kind of PPC would be more appropriately categorised as PC.	NA Confidential? – No

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Any kind of PC would be more appropriately categorised as PPC.	Confidential? – No Our work suggests other areas for future evidence development including: • Emerging AI-related risks (e.g. deepfakes and AI-generated content risks) and harmful recommender systems outpacing regulatory tools (Click/Scroll/Connect, p. 8.) • Misogynistic content and algorithmic pathways pushing children toward harmful material (Protection Through Empowerment, p. 8; Click/Scroll/Connect, pp. 20–21.) These are best treated as risk signals and gaps requiring external corroboration.
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:	Avoid unintended displacement effects from complete bans. - Click/Scroll/Connect notes that complete bans may push children into less visible parts of cyberspace making risk harder to manage and undermining adult-child communication (Click/Scroll/Connect, p. 22.) We propose combined measures including privacy-preserving age assurance and accountability by design including mandated under 18 recommender safety settings which includes features such as chronological feeds, no autoplay or infinite scroll, reduced personalisation based on harmful engagement (Protection Through Empowerment, pp. 2, 10.)
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – No
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – No
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – No

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

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- ☐ 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)

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