

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? – Y / N
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? – Y / N
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – Y / N
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	

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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 evidence concerning cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	Confidential? – Y / N
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – Y / N
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? – Y / N
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? – Y / N
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – Y / 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:	On behalf of Shout Out UK (SOUK), this submission makes the case for mis- and disinformation to be classified as non-designated content within Ofcom’s statutory reporting on content harmful to children under the Online Safety Act.
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Evidence from our recent policy brief, “Empowering a Young Electorate: Political and Media Literacy for Votes at 16,” demonstrates that the current information landscape poses a material risk of significant harm to an appreciable number of children in the UK. 1. The Material Risk of Harm to Children Ofcom’s current register of online risks to children does not currently include mis and disinformation. Yet the widespread and harmful nature of this content makes it a central threat to the democratic health and psychological resilience of young people. Our research highlights several key harms: Susceptibility to Manipulation: Without classification and subsequent mitigation, young people are at high risk of galvanisation by extremist figures and susceptibility to manipulation and potential extremist action. Mental and Emotional Resilience: Exposure to polarised narratives and extreme ideologies promoted by algorithms undermines emotional resilience and fosters a crisis of trust in institutions. Financial harms. Children, particularly teenage boys, are frequently targeted with online misinformation peddling

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	get-rich quick schemes. Ofcom's own data also shows 41% of children admit to spending more than they should online. 2. Disinformation as "Non-Designated Content" Under the Online Safety Act, "non-designated content" includes types of content that present a material risk of significant harm but are not yet formally listed as priority content. Mis- and disinformation meet this threshold because: Prevalence and Impact: Ofcom's own research indicates that a significant percentage of people encounter false material, and for 16- and 17-year-olds who will shortly be enfranchised, this content may directly hinder informed decision-making. Algorithmic Exacerbation: We know that social media algorithms prioritise extreme or misleading content. Classifying this as non-designated content would require platforms to assess and notify Ofcom of its incidence. 3. Proposed Mitigation: Classifying disinformation as "non-designated content". Enhanced Reporting and Assessment: Requiring platforms to include disinformation in their "children's risk assessments". Conclusion Failing to classify mis- and disinformation as a recognised harm to children risks continuing to endanger their mental and physical wellbeing and reducing their informed participation in democracy.
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.