

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:

Skyscanner, a travel metasearch service that allows consumers to find and compare offers for travel services, is a regulated search service under the Online Safety Act (OSA). Specifically, it is a vertical search service (VSS). Unlike general search services, VSS do not source content by crawling the world wide web. Instead, their content is provided usually via Application Programming Interfaces (APIs) with their commercial partners. Content is usually limited to certain categories, or products and services.

In Skyscanner's case, all of our search content is sourced via APIs with our commercial partners, who are airlines, hotels, car rental companies, or online travel agencies (OTAs). The content they provide to us is limited to the travel services they offer, which are themselves highly regulated.

No other search content is available on our site. Users are unable to input free-form search queries into our website – users can only initiate a search by inputting a valid city, country, departure airport, hotel name or train station. Autocomplete suggestions are limited to these terms. Users cannot complete an image or video search.

We have bounded recommender systems, such as destination and product ordering algorithms, which are strictly limited to travel-related queries and results, with strong safeguards in place including input validation, destination blacklists and content filters. No recommender systems are used to surface content outside of the travel domain.

There is, quite simply, no mechanism for users to search for or be shown PPC, PC or NDC to appear on our search service.

Further reducing our risk level, we have no user-generated content on our website, no messaging functionality, and no features enabling social interaction. Meanwhile, our business model depends on re-directing users to our partners as quickly as possible rather than keeping them engaged. If users are required to spend a considerable amount of time on Skyscanner, then we have failed in our mission to make travel search simple. We have no features or functionalities that encourage gamification,

Question	Your response
	infinite scrolling, content loops or anything else associated with sustained periods of engagement. We have a limited amount of advertising, as part of efforts to create a diverse and sustainable revenue model, but adverts are limited to travel-related services. This advertising is overwhelmingly contextual advertising, rather than personalised. Finally, users are unable to complete bookings on our website. Instead, they are re-directed to our partners to complete their transaction. We do not handle consumer monies. Given our purpose and limited features and functionalities, we believe that – clearly - our service is unlikely to attract a significant number of child users. The majority of services consumers can search for on our website, meanwhile, require a person to be at least 18 years old in order to purchase them. For this reason, our terms of service require users to be 18 or over. Skyscanner is open-access, however, so incidental access by under-18s may be possible. Furthermore, and in line with best practice regarding data privacy, we do not require users to log in to use our service, and the vast majority do not. While it is therefore not possible for us to identify the age of our users, given the nature of our service we are confident there is not a significant number of child users on our site. This is corroborated by other indications, including never receiving a complaint or user enquiry from anyone under the age of 18. Even if a child were to use Skyscanner, the risk of them encountering NDC by means of our service is low. For example, all of our partner content is governed by contracts, which require lawful, accurate, and appropriate media (such as pictures of hotels). Content undergoes automated and manual revision during onboarding. Meanwhile, all advertising content is reviewed by our ad delivery team to prevent imagery or slogans that could, for example, encourage risk taking. Finally, we do not target content at users based on their identity or demographics.

Question	Your response
	As a result of all the above, the risk of harm to children on Skyscanner is incredibly low. The risk of children encountering pornographic content, suicide content, self-harm content, eating disorder content, abusive content, content which incites hatred, bullying content, violent content, harmful substances content, body stigma content, or depression content, is negligible. In addition to all the features and functionalities of Skyscanner that mean it would not be technically possible for users to be shown or search for this content, we have never had any complaints, escalations, reported incidents or moderation cases related to any of the above types of content. For dangerous stunts and challenges content, meanwhile, the risk is low. In a small number of cases, some legitimate travel imagery may depict ‘high-risk’ activities such as skydiving or bungee jumping, for example as part of a destination marketing campaign. However, the risk remains incredibly low because of the ad and partner controls we have in place, while such imagery – if it does appear – is not framed as a “challenge” in associated copy and visual designed. Meanwhile, the content is not algorithmically optimised for engagement or escalation, there are no auto-suggestions or loops that can steer users to further (and more extreme) examples of such activities, and such content on our site cannot be commented on or re-shared. As with all other types of content harmful to children that we have assessed, we have no evidence of children being exposed to such images on our site, and no reports of children engaging in copycat behaviour after they have used Skyscanner. We have received no complaints from users regarding such content. In summary, there is no evidence of children being exposed to harmful content on Skyscanner, or of harmful content being present on our site. While not all VSS sites are the same, almost all of the reasons that make Skyscanner such a low-risk platform are due to our nature as a VSS. As Ofcom found in its Register of Risks for illegal content, VSS present a “materially lower level of risk of harm than general search services” due to their limited functionalities and the fundamentally different way in which they source their content.

Question	Your response
	In the case of harms to children, VSS are almost certain to present an even lower level of risk of harm, due to their commercial nature as search services for narrow categories of products and services. Certainly, the risk of harm to children posed by travel VSS is in our view, negligible. In addition to the evidence from our own site, we remain unaware of any published literature that identifies VSS as posing a risk of harm to children. We believe the latest evidence validates Ofcom's finding that VSS are less risky than general search services. However, we encourage Ofcom to consider how, based on the latest evidence, it could go further to ensure that the obligations of the OSA, including the protection of children duties and risk assessment duties, are proportionate for firms in scope. We fully support efforts to improve the safety of children online. However, we also believe it is clear that certain types of services (such as those identified in Ofcom's Risk Profiles) present a significantly higher level of risk to children than a site like Skyscanner. Following Ofcom's work on this important report on content that is harmful to children, it should work with Government to consider how the evidence it has gathered could be used to further refine its approach to implementation so that the Online Safety regime is more targeted at the services actually used by children.
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

Question	Your response
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 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

Question	Your response
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.	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:	
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – Y / N
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – Y / N

Question	Your response
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.