

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? – 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

Question	Your response
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
Whether it is appropriate to make changes to the kinds of PPC and PC	

Question	Your response
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? – N Section 62 which sets out priority content that is harmful to children is too broad in (2) in its designation of abusive content and (3) in hateful content. It encourages companies to err on the side of caution in removing content which is potentially abusive or hateful towards the listed characteristics. In a post on 27 July 2025 (https://x.com/BenBarryJones/status/1949452712397218237?s=20), Ben Jones, the director of case management at the Free Speech Union, identified a post encouraging single sex space that had been hidden from the view of accounts that had not been age verified. It was potentially the case that the post was hidden because of section 62 encompassing gender reassignment as a characteristic which is priority content under (2) and (3). The duties in respect of children are stronger than those regarding adults and retain the “legal but harmful” premise that was curtailed for the adult sections of the Act. Ofcom encourages “highly effective” age verification tools and only allows that children will not be at risk of harm unless those tools are in place. This means that adult users unwilling to sacrifice privacy for the sake of access to non-age-gated content will have much of what they view online restricted. This has also meant that parliamentary discussion of grooming gangs has been age-gated with unverified users being prevented from viewing Katie Lam MP’s speech on group based child sexual exploitation in the House of Commons (https://x.com/BenBarryJones/status/1949436158577881117?s=20); and a post about the Crusades and Richard Coeur de Lion was also age-gated (https://x.com/BenBarryJones/status/1949125946935533695?s=20).

Question	Your response
	“Examples or kinds of content that Ofcom considers not to be abuse and hate content that is harmful to children” in the Ofcom guidance does not go far enough to emphasise freedom of expression. It mentions: “A comment on a post by a politician or political candidate who has a listed characteristic, where the comment expresses strong disagreement with a policy position, rather than abuse or hatred against the poster’s listed characteristic” But it does not use examples of how far political speech can extend. This is particularly important for policy discussions around trans issues and religion where there is a legitimate interest in broad expression protected by article 10. An examples of journalistic content is a follows: “journalistic account of an incident of hate and abuse” This is again far too narrow. It does not recognise journalism that could raise issues that could be characterised as hateful e.g. journalism highlighting conflicting rights with regards to trans issues, such as articles by Hannah Barnes, or Andrew Norfolk’s journalism on group based child sexual exploitation. The Free Speech Union is also concerned that non-designated harmful content will be age-gated due to platforms taking an overly cautious approach in light of Ofcom’s regulatory powers. Ofcom should be careful not to add further content to the PC and PCC categories, where restrictions will necessarily be harsher. If Ofcom elects to do so, they should consider the impact on freedom of expression and give specific guidance on where the content will be protected from interference with freedom of expression.
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? – N

Question	Your response
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
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.