

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:

In conducting the research for this book, we are working in seven distinct school settings and surveying the perspectives of nearly 500 young people. We captured a large swathes of data on youth experiences on social media, which was noted to be both fun and helpful but also risky and dangerous. Our data encapsulates schools in lower socioeconomic demographics with high rates of poverty and crime; elite, independent fee-paying schools; and diverse, inner-city schools where religious beliefs were prominent; for example. Each school offered distinct views into youth social media use and mobile peer networks. This wide lens enabled us to show how image-based sexual harassment and abuse traverses' class, culture, race and religion but lands in particular ways. (Ringrose & Regehr, 2025)

At the conclusion of this book, we made four specific recommendations for Snapchat, which had the highest rates of image-based abuse. We recommended that Snapchat should:

1. Maintain a record of images, videos and messages.
2. Create clearer and more extensive privacy settings.
3. Create more rigorous identity verification procedures.
4. Develop innovative solutions to prevent image-based sexual harassment and abuse and improve reporting functions. (Ringrose & Regehr, 2025)

Improvements could be made to the incorporation of IB-SHA (image based sexual harassment and abuse) has not into UK Government policies on sexting and sex and relationship education. The current updated government guidance on education regarding "sharing nudes and semi nudes" (Department of Science, Innovation and Technology, 2024) does include a footnote to online sexual harassment guidance we helped design (ASCL, 2021). However, the government document could be improved by further incorporating elements of image-based sexual harassment and abuse including cyberflashing, sharing intimate images, upskirting and AI deepfakes. (Ringrose & Regehr, 2025)

Across our study, we found that participants rarely reported their experiences of image-based sexual harass-

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	ment and abuse that occur online. By 'report' we are referring to instances when the young person identifies what has happened as a problem, and participates in a formal process to take some action towards preventing or seeking support for the harassment or abuse. From our survey findings, just over half of participants (n=54/106) reported doing nothing when they had received unwanted sexual content online or had their image shared without their consent. Similarly, the Project deSHAME'S (2017) survey with 3,257 youths aged 13 to 17 found that 53% of respondents ignored their experience of online sexual harassment. When asked why they chose not to report, 49% (n=45/94) responded 'other', 30% (n=28/94) responded 'I don't think reporting works', 15% (n=14/94) responded that they 'knew the person,' and finally 4% (n=4/94) responded that they 'didn't know how to report.' When asked specifically why they would not seek help from a teacher, the most common response was that they were worried that their school would overreact. (Ringrose et al., 2021) For this project, we administered an online survey to 551 teens of all genders (aged 13-18), 72 parents/carers, and 47 teachers, safeguarding leads and/or school staff across schools in England. These surveys were disseminated between May and September 2021 by our charitable partner, the School of Sexuality Education (SSE). In this study, we found that online harm is rife for young people and encompasses a wide range of practices. 78% of all participants in our study experienced at least one type of digitally facilitated harm such as body shaming, harassing comments, public outing of their sexuality, and image based sexual abuse. For almost all participants (98.5%), these harms increased during COVID-19. (Horeck et al., 2023)
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.	Not confidential 41% of girls report having been asked to send a sexual image, compared to only 17.5% of boys. In addition, 44% of girls felt pressured to send a nude image compared to only 12% of boys. We were also able to determine from the survey that the social media platform Snapchat ac-

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	counted for 60% of solicitation for nudes, and 33% of image-based sexual abuse, which aligned with our qualitative findings. (Ringrose & Regehr, 2025) We also conducted similar research on this topic in 2011; however, what differed from the 2011 research was the new centrality of images of male genitals (dick pics) that arose in the 2019– 2020 research. 75% of girls in our focus groups reported having received an unwanted penis image, which is now classified as cyberflashing (Ringrose & Regehr, 2025). We found 37% of girls had received unwanted sexual pictures or videos online, with 32% of girls receiving unwanted dick pics. In contrast, only 20% of boys had received unwanted sexual images online, and only 5% of boys had received an unwanted dick pic. Amongst young people under 18 years of age, girls are over six times more likely to be cyberflashed than boys. Furthermore, 80% of girls in the survey reported feeling ‘disgusted’ and 58% felt ‘confused’ when receiving dick pics. (Ringrose & Regehr, 2025)
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.	Not confidential Girls and boys are under different types of pressure and subject to different risks in general. Girls are experiencing more pressure to send images and more images are being sent to girls without their consent. (Ringrose & Regehr, 2025) We found 42% of recipients of unwanted sexual images claimed that they did not know the age of the sender. This was likely the result of the available anonymity of the platforms used—particularly, the ability for users to hide their age, amongst other identifying characteristics. Of the recipients who did know the age of the sender, more than half (56%) of the unwanted sexual images were received from youth senders (i.e. under 18 years old) with the remainder (43%) from adults. (Ringrose & Regehr, 2025) We also found, however, that young people felt that a large amount of unwanted content they were receiving (61%) was coming from either unknown senders or bots. This is important as we can see that it is not a known or

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	even human contact that spreads the unwanted sexual content. Young people can be a target for sexualised content on platforms like Snapchat or Instagram, where the affordances can be used to create a sense of intimacy. The young people told us they were frequently exposed to bots trying to access weaknesses in the user or to attract views and clicks to move the user to paid content. (Ringrose & Regehr, 2025) There were also important issues around the porn push which we found on Instagram. Our study took place in 2019–2020 and the biggest issue for boys was being sent mass group messages with porn links or encouraging them to buy sex subscriptions on Instagram. It took two further years, however, for Instagram to introduce a filter for abusive messages in 2021 (BBC, 2021). (Ringrose & Regehr, 2025) (Ringrose & Regehr, 2025) It is only by acknowledging the degree and severity of abuse happening online, and how it disproportionately impacts girls as well as gender minority and LGBTQ youth, that we can collectively challenge normalised forms of abuse and support all young people in navigating the complicated terrain of digital sexual cultures. (Ringrose & Regehr, 2025) In this report, we conducted qualitative and quantitative research on digital image-sharing practices with 480 young people aged 12 to 18 years (336 in the survey and 144 in focus groups) from across the UK. Although our study examined a wide range of digital sexual behaviours, we found that non-consensual image-sharing practices were particularly pervasive, and consequently normalised and accepted among youth. The overall scene I similar to that of 2011. Sexual pressure and coercion are still common features of solicitation for nudes. The double standards, in which girls who send sexual images are slut-shamed, whilst boys are rewarded for possession of and sharing girls' nudes, create gender-specific pressures on youth. (Ringrose et al., 2021) Boys were rewarded for sharing girls' images amongst their peers, as an indication of their masculinity status. Girls were shamed and victim-blamed for having their image shared without their consent. Further, IBSA risk and harms are not simply gendered but also, deeply

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	classed and raced, with young people having variable access to support. (Ringrose et al., 2021) Sexual and gender minorities experience much higher rates of online harm compared to cisgendered and heterosexual teens. Researchers must pay attention to how identity characteristics impact young people's experiences, and tailor resources and support accordingly. In other words, it is imperative for researchers and educational practitioners to explore different categories of experience, and to break down different forms of harm, so as not to homogenize young people's experiences of technology-facilitated gender-based violence. (Horeck et al., 2023) While girls and gender and sexual minorities face higher rates of online harm, there are significant findings around boys that need to be addressed. Boys were often targeted via gaming platforms, porn bots, and other fake accounts. They also received unsolicited sexual images and pressure to send nudes. While boys are often reticent to talk about their experiences as either perpetrators or victims of these practices, engaging boys in these conversations is crucial if we are to challenge gender-based violence (Keddie et. al 2022). (Horeck et al., 2023) Teens reported personally experiencing discrimination based on their sexual orientation and gender identity. - 40% of sexual minorities (compared to 8.4% of heterosexual youth) experienced sexuality-based harassment, which included offensive and/or degrading messages, comments and/or "jokes" about their sexual orientation or being "outed". - 60% of lesbian youth, 53.1% of bisexual youth, 50% of "other", 40% of queer youth, 33.3% of pansexual youth, and 25% of gay youth experienced sexuality-based hate and discrimination. - Of these respondents, 70.21% reported that at least one form of this hate increased during COVID-19. - 27.3% of gender minorities were discriminated against (17.65% of nonbinary, 50% of "other" and 66.7% of trans youth), experiencing offensive and/or degrading messages, comments or "jokes" about their gender.

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	- Overall, one in three gender minorities (50% for “other”, 29.41% of nonbinary, and 66.67% of trans youth) experienced sexuality-based hate. (Horeck et al., 2023)
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Not confidential Snapchat was the most common platform where unwanted images were received, with 62% of unsolicited sexual images and/or videos received while using Snapchat. This was followed by 21% via Instagram, 8% via WhatsApp, 3% on TikTok, and 1% via Facebook, likely because few teens now use Facebook. (Ringrose & Regehr, 2025)(Ringrose et al., 2021) Instagram also creates various opportunities for perpetrators to engage in image-based sexual harassment and abuse. Despite young people generally having more caution around the images they posted on Instagram because of the permanence of the images (the archival nature of the site) (Tiidenberg, 2018), we found that the message request function allowed for mass numbers of young people to be bombarded with sexual group message content. (Ringrose & Regehr, 2025) Instagram was the second most common platform used for image-based sexual harassment and abuse, accounting for 21% of unsolicited sexual images and/ or videos, 21% of solicitation for nudes, and 33% of image-based sexual abuse. Young people across every site and in every age group had received unwanted sexual messages from porn bots on Instagram. Porn bots are automated activities sending links to online porn content. Boys also spoke about content coming through on PS4 and other gaming programs. (Ringrose & Regehr, 2025) Unwanted contact and sexualisation: - 43.1% of respondents experienced at least one form of unwanted contact and sexualisation. - A greater portion of girls (51.4%) and gender minorities (56.5%) experienced this unwanted contact and sexualisation, compared to 28.2% of boys. - Sexual minorities were also more likely to experience this, with 62.6% of sexual minorities compared to 36.12% of heterosexual.

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	- 70.35% of respondents claimed that at least one of these experiences increased since the start of COVID-19. - The most common platform this unwanted sexual contact and sexualisation occurred on was Instagram (46.6%). (Horeck et al., 2023)
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 survey found low rates of reporting of unwanted images being sent or of being harassed to send images. Over half of the participants reported doing something when they had received unwanted sexual content. Nearly one third said 'I don't think reporting works'. 5% reported telling their parents/ carers and a 2% reported it to their school. (Ringrose & Regehr, 2025) On sexual exploitation and coercion: - 10.8% of participants experienced sexual exploitation and coercion, which included: online threats of a sexual nature (e.g. rape threats), being blackmailed/coerced into engaging in online/offline sexual acts (sextortion), someone attempting to lure you to give money or details to be sextorted (honey trapping), and or manipulation or deception by an adult stranger (e.g. cat-fishing). - Gender minorities were most likely to experience this with 21.7% of gender minorities, followed by 12.25% of girls, and 7.62% of boys. - Sexual minorities were also more likely to have this experience, with 16.3% of sexual minorities, followed by 9.43% of heterosexual participants. Of note, while these prevalence rates are comparatively low, the degree of harm and severity of these experiences is arguably much higher. (Horeck et al., 2023)
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	Adolescent girls often reported receiving unwanted images of male genitals (i.e. cyberflashing) from unknown adult men, and known and unknown boys (same-aged peers). A large majority of girls who received such images reported feeling 'disgusted', 'embarrassed', and

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cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	‘confused’. Second, girls commonly reported receiving requests for sexual images from unknown adult men, and known and unknown boys (same-aged peers). Of those who had been asked to send nudes, girls felt more pressure to do so, compared to boys. Solicitation was often initiated through being sent an unsolicited dick pic—referred to as a ‘transactional dick pic.’ (Ringrose et al., 2021) These findings are remarkably similar to those of a YouGov (2018) survey, which found that ¾ of the millennial women who had been sent an unsolicited penis image found it ‘gross.’ (Ringrose et al., 2021)
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	N/A
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.	Not confidential A decade of research has demonstrated that girls are at greater risk of their images being shared without their consent (Johnson et al., 2018; Lippman & Campbell, 2014; Ricciardelli & Adorjan, 2019; Ringrose et al., 2012; Setty, 2019). This research has also found that girls often face slut shaming and victim blaming when their images are shared due to the differential value of images of bodies and sexual double standards (Dobson & Ringrose, 2016; Lippman & Campbell, 2014; Ringrose & Harvey, 2015). In line with this research, our focus group findings indicated that the negative consequences for having one’s image non-consensually shared were far greater for girls compared to boys, with girls facing increased stigma and shame. (Ringrose et al., 2021)
Whether it is appropriate to make changes to the kinds of PPC and PC in the Act	N/A

Question	Your response
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.	N/A
Any kind of PPC would be more appropriately categorised as PC.	N/A
Any kind of PC would be more appropriately categorised as PPC.	N/A
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:	N/A
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	N/A
Evidence that the kind(s) of content pose a risk of significant harm to children.	N/A
Evidence to support each kind of content being categorised as either PPC or PC.	N/A

References

Horeck, T., Ringrose, J., Milne, B., & Mendes, K. (2023). *Young People's Experiences of Technology-Facilitated Gender-Based Violence During COVID-19*. University College London. <https://discovery.ucl.ac.uk/id/eprint/10186290/#:~:text=These%20worries%20further%20increased%20during,exploitation%2C%20grooming%2C%20and%20abuse.>

Ringrose, J. & Regehr, K. (2025). *Teens, Social Media, and Image Based Abuse*. Springer Nature.
<https://link.springer.com/book/10.1007/978-3-031-92322-7>

Ringrose, J., Regehr, K., & Milne, B. (2021). *Understanding and Combatting Youth Experiences of Image-Based Sexual Harassment and Abuse*. University College London.
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