



Consulting children on Protection of Children Online Safety Proposals

A report by Revealing Reality on behalf of Ofcom based on research and engagement with children aged 8-17



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Foreword

This report outlines children's views about Ofcom's proposals to protect children from online content that is harmful to them. It reflects our commitment to engaging with children and embedding their voices in our policy work.

Ofcom is the independent regulator for communications services in the UK and has statutory duties in relation to media literacy and online safety. The Online Safety Act 2023 ('the Act') requires in scope user-to-user and search services to have systems and processes in place designed to protect children from content that is harmful to them. In May 2024, we published our consultation on protecting children from harms online (the Protection of Children Consultation), which recommended over 40 measures that providers of user-to-user and search services can take to reduce, mitigate and manage the risk of children encountering harmful content on their service.¹

Each year, we hear from thousands of parents and children about their experiences online, as part of our research programme. The Protection of Children Consultation received a lot of interest and feedback from a range of stakeholders, but we recognised that children themselves were unlikely to engage in the wider consultation process. To ensure children's perspectives could be considered, we decided to proactively seek their views on the proposed measures in the Protection of Children Consultation, given these would have a direct impact on children's online experiences.

For this project we commissioned research agency Revealing Reality to run a deliberative consultation process with 112 children aged 8-17 from across the UK. Together with Revealing Reality, we created materials that presented the proposed measures and relevant context in an age-appropriate and accessible way, and asked children to share their views on these. Using a range of creative and participatory exercises, children were asked to discuss and reflect on these proposals and think about how they might positively or negatively affect the lives of children online.

Overall, the children we spoke to generally supported the measures. Many children talked about times when they had felt unsafe online, or when they had personally encountered online harms. They were happy to learn that there was a regulator working to create a safer online environment, saying this made them feel less like children were solely responsible for protecting themselves online. While they had some concerns about the fair and effective implementation of some of our proposals, children could generally see the benefit of the proposed measures in preventing them from encountering online harms or supporting them if they did come across harmful content.

The children who took part in the project were extremely open, thoughtful and insightful in their responses. They told us that they appreciated the opportunity to participate and valued the chance to have their voices heard, just as we valued the chance to hear from them. The children provided useful evidence that has helped us to think about related issues to strengthen our final measures. Children's input has also helped us think about related issues to consider as we continue our work on how to protect children from harmful content online.

This project also shows the value of having dialogue with children about our work on online safety. Engaging children in meaningful conversations where they feel respected and heard encourages them to open up about their online experiences. This helps us to understand what it is like to be a child online in the UK and helps children to trust that their concerns are being listened to.

Note: whilst this report includes some references to Ofcom's draft and final codes of practice addressing content that is harmful to children, the findings from this deliberative consultation project with children should not be considered a reflection of any policy position that Ofcom may adopt as part of our role as the online safety regulator. All findings contained in this report reflect the perceptions of children who took part in this project, not the views of Ofcom or Revealing Reality. The report includes children's experiences and perceptions of various platform functionalities, including potential safety measures or features. Children's suggestions of what should be improved have not been assessed by the research team and should not be seen as a validation of technical feasibility, proportionality or effectiveness of the suggested solutions. Children's views have also not been verified to ensure they provide an accurate reflection of the functionalities or safety processes deployed by the platforms mentioned by children. Specific online platforms are referenced throughout the report reflecting the children's views and experiences. This should not be interpreted as an

indication of the prevalence or origination of content that is harmful to children on particular platforms, but rather as indicative of the platforms used by those taking part in the project and their experiences.

About Revealing Reality

Revealing Reality is an independent social research agency, working with regulators, government and charities to provide insight into people's online behaviours and experiences.

Studying how the digital world is shaping people's behaviours is something we do every day. We regularly conduct detailed qualitative and quantitative behavioural research, observing how people really use digital products, services and technology. This includes exploring how digital design shapes behaviour – across technology, gambling, financial products, the health service, and more.

Visit <https://www.revealingreality.co.uk/> to find out more about our work or to get in touch.

Executive summary

Project background

This report presents findings from a project commissioned by Ofcom to gather children's views on the draft Children's Safety Codes proposed by Ofcom.

The project involved a deliberative process with 112 children aged 8-17 across the UK, including children with specific characteristics of interest and/or lived experience of harm. The project aimed to understand children's perspectives on Ofcom's draft Children's Safety Codes and how these might affect their online experiences.

To enable children to engage meaningfully, the draft Children's Safety Codes were presented to them in a child-friendly way. Throughout this report, we have referred to the child-friendly version of the safety codes as 'Proposals', which were grouped into five thematic 'Topics'.

The children broadly supported Ofcom's role and Proposals

Most children were positive about Ofcom's role in online safety and expressed support for the proposed measures to protect children from content that might be harmful to them. They felt children were currently having to do too much on their own to protect themselves online and so appreciated there being new responsibilities on services to keep children safe. They understood, and were pleased, that Ofcom will be regulating this area to create a safer online environment. Some children felt that the Proposals to protect children from harm online were overdue. This was expressed more often from children who described having personal experience of online harm, as well as children whose circumstances made them potentially more vulnerable to online harm (e.g. children in care, or children with special educational needs and disabilities). On the whole, the children were happy with the idea that adults were taking greater responsibility for online safety.

While there was overall support for the Proposals, many raised concerns about how uniformly and effectively they would be implemented

Children raised some concerns about how well the measures would work in practice. These doubts stemmed from their current experiences and understanding of the online world, where they had encountered challenges with existing online safety features. They questioned the ability of user-to-user services to accurately identify and moderate harmful content, and they were sceptical about the effectiveness of newer methods for checking children's ages. The Proposals that were less popular tended to be those that involved providing children with tools and information, as these were seen as reactive compared to Proposals that were seen as taking more proactive steps to make the internet safer. However, these Proposals also prompted practical concerns, such as how accurately content would be identified and moderated, and how age verification would work.

A repeated concern was that measures may not be applied uniformly among different children and in different online contexts. These concerns were driven not by worries about harm or data misuse, but by the prospect of being unfairly left out of social environments their peers had access to.

Specific feedback on Ofcom's Proposals

Topic 1

Access to online services and sites

Proposals controlling or restricting children's ability to access certain online services, or content harmful to children.

In general, children were supportive of the idea of preventing those under 18 from accessing content intended for adults and supported stronger age checks. There were concerns about how these would be implemented and whether there could be any negative impacts - ranging from age assurance methods not being strong enough to work well, to children sharing their age online more widely than would be safe.

Topic 2**Online services should prevent children from seeing harmful content**

Proposals aimed at reducing the prominence, automatic recommendation or exposure of content harmful to children

Children generally supported systems to help prevent under-18s from encountering harmful content online. There were concerns about how effective these systems would be. They did not think blurring harmful content or making it harder to find by downranking it would be effective and instead preferred that harmful content be removed altogether. Some children suggested a more nuanced approach to content restrictions, such as gradual access to content based on age, which they thought would help build resilience.

Topic 3**Tools to give users control over interactions**

Proposals giving children control over their response to harmful content and their interactions with other users

While children were supportive of these tools, and valued being able to have control over their online experiences, many recognised them as features that already exist, and so they did not anticipate the Proposals leading to much change. This created some concerns that without other action taken, these tools could make children feel solely responsible for protecting themselves, when it was Ofcom and online services who should be taking primary responsibility for online safety. They also had some concerns about social consequences – such as escalating arguments or issues between peers – arising from the use of tools such as blocking or muting accounts. Children supported easier reporting mechanisms, but had some concerns about whether they would make a difference based on current experiences with such tools. They also saw these as largely reactive tools, and expressed that they would prefer the harm to have been prevented in the first place.

Topic 4**User support and provision of clear and accessible information and guidance to children**

Proposals ensuring children can access clear and accessible information and guidance about a service

Children were supportive of clear and accessible user support and guidance on online services. They reported that current terms of service were too long and difficult for them to understand, and they often bypassed them. They suggested that both terms of service and support materials should be presented in more engaging formats, such as including bullet points or interactive elements.

Topic 5**Governance and internal systems**

Proposals around service policies, accountability, risk reviews and their tracking of content online

Children supported the idea of online services having teams in place to ensure their safety. They thought it was important for Ofcom and user-to-user services to collaborate to improve online safety. However, some children expressed doubts about how cooperative online services would be in adhering to online safety measures.

What did the children say?

“Something I didn't know when watching ‘the video’ is that people are regulating online. As a 13-year-old, I feel a lot safer now. I use Snapchat, Instagram, TikTok and Facebook, and I feel a lot safer now knowing someone is online watching it and keeping us safe.” – Glasgow workshop, 13-14

“It's so dangerous because we are almost forced to mature quickly and we see so much that is actually bad...All of this is damaging, and social media has a large part to play...So I think these are good ideas.” “It's hard. How will Instagram or TikTok know what is harmful and what is not? Like I know that they put a lot of sensitive content warnings, and I only click with sensitivity, but each person's different and going to find different things triggering.” – Ella, 17, interviews (lived experience of harm)

“Having social media is a way to act older. I could speak to my friends and see everyone's life. But when you're older, you realise it's not all that; it's not worth it all. I wish I had never ever joined it... it's very fake and damaging. They romanticise things that shouldn't be romanticised, like eating disorders... imagine that coming up on your feed. They should change the age that people can go on social media.” – Nina, 17, interviews (online harm)

“I think that every social media app should have age verification because it would also stop other situations from happening, for example old men pretending to be young to take advantage of younger children. Anyone could lie about their age, and I don't like that.” – Lara, 17, interviews (online harm)

“You can just lie, I'm probably some really old person. I just scroll back as far as possible, oh yeah, you're 209 years old but they don't ever question it.” – Nottingham workshop, 16-17

“I blocked them all on WhatsApp but then they just started to phone me from non-caller ID, when I answered they told me to go kill myself... when you block people, they'll always find a way around it.” – Sasha, 15, interviews (lived experience of harm)

“I think it's a really positive start but hope all of the tech companies take it seriously. Too often companies get around things or just offer the lowest form of security or verification and make out that they care about harmful content and the impact it has. The main focus must be on keeping people safe not the money that's being made.” – Cardiff workshop, 15-16

“If the government has ruled content as ‘dangerous’ then maybe children shouldn't be exposed to it, but some children might have more mature interests and should be able to access this kind of content if they wanted to.” – Belfast workshop, 14-15

“I think it's good that Ofcom are using young people's voices, it's quite difficult to be heard, we don't have much of a voice when it comes to online things.” – Glasgow workshop, 13-14

“I think online safety is quite hit or miss because if you don't get taught it you don't understand. I didn't get taught till quite late, year 7, I think we need to be taught earlier in life.” – Cardiff workshop, 15-16

Introduction

Since the Online Safety Act became law in 2023, Ofcom has been developing codes and guidance to help online services meet their duties. After consulting first on illegal harms duties, Ofcom has consulted on draft Children's Safety Codes and guidance concerning content that the Online Safety Act defines as harmful to children.¹ This encompasses primary priority content (promoting suicide, self-harm, eating disorders, and pornography); priority content (abusive, hateful, bullying content, content depicting or encouraging violence, the ingestion of harmful substances, or dangerous stunts and challenges); and non-designated content.² The Codes outline steps that relevant services can take to protect children online, with measures tailored to work on user-to-user services and search services.

Committed to transparency and building trust in the regulatory regime, Ofcom sought to engage with stakeholders, including children, on the draft Children's Safety Codes. To ensure children could confidently share their views based on accurate information, a deliberative engagement process was deemed the most effective approach.³ A deliberative approach ensures children's perspectives can be considered as part of the ongoing development of codes and guidance. This approach allowed children to express their thoughts on the potential impact and effectiveness of the draft Children's Safety Codes.

This project aimed to:

- Engage children aged 8 to 17 with the draft Children's Safety Codes, Ofcom's role as the Online Safety regulator, and what the codes might mean for under 18s who use online services
- Consult with children to hear their views on draft Children's Safety Codes to protect them from harm online
- Understand the different factors and attitudes that may impact children's views

¹ This relates to the protection of children consultation published on May 8th 2024, rather than the illegal harms consultation.

² This is set out in full in, sections 60, 61 and 62 of the Online Safety Act.

³ Deliberative research and engagement involves 'upskilling' participants on a particular topic to help them develop more informed viewpoints on issues that are complex or which they are unfamiliar with. Deliberative methods are designed to encourage reflection, debate and discussion between peers. The process can both provide opportunities for people to be more involved in policymaking, but also help policymakers gain a deeper understanding of the perspectives of different people affected by their work.

About the project

What the children were consulted on

Ofcom has developed and consulted on over 40 draft measures in their draft Children's Safety Codes⁴. For the purposes of this engagement, and to ensure children could easily understand and provide meaningful feedback, Revealing Reality and Ofcom collaborated to group the draft Children's Safety Codes into five Topics. Child-friendly wording was used to describe the overarching Topics and the related Proposals that sat underneath them.

The five Topics that children were consulted on were:

Access to online services and sites: Proposals controlling or restricting children's ability to access certain online services, or content harmful to children.⁵

- 57 children were consulted on this Topic. This was covered with children aged 8-10 (years 4-5), 11-12 (year 7), 12-13 (year 8) and 16-17 (year 12).

Preventing children from seeing harmful content on online services: Proposals aimed at reducing the prominence, or automatic recommendation of, or exposure to, content harmful to children⁶

- 67 children were consulted on this Topic. This was covered with children aged 8-10 (years 4-5), 11-12 (year 7), 12-13 (year 8), 14-15 (year 10) and 16-17 (year 12).

Tools to give users control over interactions: Proposals giving children control over their interactions and over their response to any harmful content they may encounter.⁷

- 48 children were consulted on this Topic. This was covered with children aged 10-11 (year 6), 13-14 (year 9) and 15-16 (year 11).

User support and the provision of clear and accessible information and guidance to children: Proposals ensuring children can access clear and accessible information and guidance about a service.⁸

- 26 children were consulted on this Topic. This was covered with children aged 11-12 (year 7) and 14-15 (year 10).

Governance and internal systems: Proposals on the policies, accountability, and risk reviews of online services and their tracking of online content.⁹

⁴ For further details see Ofcom's proposed [codes of practice at a glance](#), or look at details of the [full consultation](#). At the same time as publishing this report, Ofcom are also publishing their final codes of practice and decisions in this [statement](#). The footnotes below provide details about which draft codes of practice were the basis for the materials children were shown in this project. We have noted in parentheses the equivalent labels for the final codes of practice, alongside the draft versions.

⁵ Measures included under Topic 1: AA1, AA2, AA3 and AA4. Section 10 [Volume 4](#) of the statement sets out a conversion of how we referred to the measures in our May 2024 consultation and their corresponding Codes number at statement.

⁶ Measures included under Topic 2: AA5, AA6, RS2, RS1, CMI, SM1 and SM2. Section 10 [Volume 4](#) of the statement sets out a conversion of how we referred to the measures in our May 2024 consultation and their corresponding Codes number at statement.

⁷ Measures included under Topic 3: RS3, US4, UR1, UR2, UR3, SD1, US1, US2 and, US3. Section 10 [Volume 4](#) of the statement sets out a conversion of how we referred to the measures in our May 2024 consultation and their corresponding Codes number at statement.

⁸ Measures included under Topic 4: US5, SD2, TS2, and US6. Section 10 [Volume 4](#) of the statement sets out a conversion of how we referred to the measures in our May 2024 consultation and their corresponding Codes number at statement.

⁹ Measures included under Topic 5: GA1 to GA7, TS3, UR4, UR5, CM2 to CM7, SM3, SM4, SM5, SM6 and SM7. Section 10 [Volume 4](#) of the statement sets out a conversion of how we referred to the measures in our May 2024 consultation and their corresponding Codes number at statement.

- All children who took part in the engagement project were asked to provide optional, short written reflections on this Topic.

The children were consulted on Proposals that sat underneath these Topics. These Topics clustered similar Proposals together and were simplified in child-friendly language.

The children were consulted on both measures relating to user-to-user services (online services that allow users to create, upload, or share content that other users can see) and search services (internet-based services that allow users to search more than one website or database for information, websites, or other content). Some of the feedback from children cut across both of these services, whereas some only related to user-to-user services or search services.

Wording was further simplified for children aged 8-11 for comprehension purposes, and the Topics were approached at a higher level. Unlike the older cohort, this age group were not asked to reflect on specific harms. Facilitators prioritised building context about the topic with 8-11-year-olds, ensuring that they understood Ofcom's Proposals so they could better reflect on what this might mean for them and for other young people.

Consulting children with a range of experiences

A total of 112 children aged 8-17 took part across the UK and completed all three Touchpoints in the project.¹⁰ This included 92 children in the 'core' sample who took part in workshops, and 20 children who took part in face-to-face or remote interviews, either one-to-one or in small friendship groups (e.g., a triad).

Evidence from children who took part in the workshops will be labelled as 'workshop' throughout the report, and evidence from those taking part in the interviews will be labelled as 'interviews'.

Children in the core sample were recruited via location and year group:

Location	Year groups
Twickenham	Years 4-5 (ages 8-10)
Trowbridge	Year 6 (ages 10-11)
Stockport	Year 7 (ages 11-12)
Maidenhead	Year 8 (ages 12-13)
Glasgow	Year 9, or S2 in Scotland (ages 13-14)
Belfast	Year 10 (ages 14-15)
Cardiff	Year 11 (ages 15-16)
Nottingham	Year 12 (ages 16-17)

The priority for this project was to have a diverse, representative sample roughly reflecting UK demographics.¹¹ The main sampling characteristics focused on the following variables:

- Age and year group
- Access to, and use of, online user-to-user and search services
- Gender
- Ethnicity
- Location (covering all four nations and including rural locations)
- Household socio-economic grade

¹⁰ All children who took part completed all three Touchpoints described in the methodology section.

¹¹ Please see annex for a quota breakdown of the sample.

To ensure diverse perspectives were represented, this project included children with experiences and characteristics of interest, capturing feedback from those with differing circumstances and needs.

Children who took part in interviews were recruited based on the following criteria:

- Age (13+)
- Children with SEND
- Young influencers (respondents with a public social media account with at least 5,000 followers)
- Children in care
- Children with experience of harm online
- Children with lived experience of self-harm, an eating disorder, or a suicide attempt. For ethical and safeguarding reasons, children in this group could only participate in this project if they had been in recovery for at least 6 months and had support in place

Project approach and methodology

This project took a deliberative approach, including multiple Touchpoints with children. This approach was taken to:

- Establish a clear understanding of children’s initial opinions towards online safety and previous knowledge of Ofcom (baselining) before introducing any new information. This helped to gauge the impact of the information provided on their views.
- Maximise the effectiveness of time spent in face-to-face sessions by reducing the overload of new information and focusing on deeper discussion and deliberation.
- Maintain engagement with the children throughout the project Touchpoints, ensuring they felt their evolving opinions were valued, and that they had a chance to offer feedback over time.

Touchpoint 1: Building context	Touchpoint 2: Core engagement	Touchpoint 3: Follow-up and reflection
Survey 1: Baseline views	Activity based deliberative workshops in child-friendly community spaces (92x children)	Survey 3: Final views and reflections
Background and intro video	Activity based deliberative mini groups and 1-1 interviews (20x children)	
Survey 2: Post-video views		

Touchpoint 1: Building context

Touchpoint 1 was completed by children at home at least a few days before Touchpoint 2, an in-person workshop in their local area.

The key objectives of this Touchpoint were to establish a foundational understanding of each child’s thoughts on online safety and so this could be built on in future touchpoints. By introducing basic background information and exploring initial reflections, the aim was to gauge baseline perceptions and prepare children for deeper engagement with the ideas proposed in Ofcom’s project.

Touchpoint 1 began with a short survey, which included an assessment of children’s unprompted understanding and views on online safety. This initial exercise used a mixture of multiple choice and open response questions to gauge children’s original understanding of online safety, who they thought was responsible for protecting children online and what this might mean for them.

This was followed by a short 5-minute animated video which included:

- A brief introduction to Ofcom
- A high-level overview of the Online Safety Act and its key goals
- A brief overview of Ofcom’s Proposals to protect children from harm online

- An overview of what to expect from the workshop and interviews

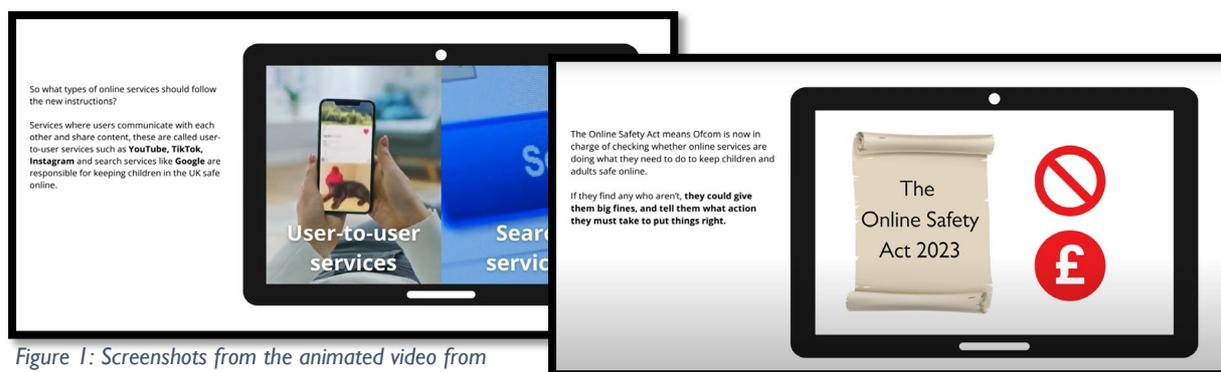


Figure 1: Screenshots from the animated video from Touchpoint 1.

After watching the video, the children completed an 'endline' exercise which asked similar questions to those in the initial survey. This final task also asked children to submit video selfies reflecting on what they learnt from the video, and how they thought Ofcom's Proposals might impact their online experiences.

Touchpoint 2: workshops and interviews

The main goal for this Touchpoint 2 was to engage children in in-depth, deliberative engagement on Ofcom's draft Children's Safety Codes, capturing their opinions and insights within a comfortable environment.

Children in each Touchpoint 2 workshop discussed two out of the four possible Topics, with one group discussing only Topic 3¹² as this was a larger Topic with more content. In workshops with 8–11-year-olds, children covered a higher-level version of Topics 1, 2¹³ and 3 using simpler language.

Topics 1- 4¹⁴ were discussed in-depth across the workshops and the interviews. As it focussed on internal user-to-user systems rather than user-facing Proposals, Topic 5¹⁵ was not covered in depth in Touchpoint 2 given that the focus was primarily on user-to-user systems rather than user-facing Proposals.

To help make the session interesting and encourage conversation, facilitators ran a range of activities including:

- **Written activities:** private response sheets asking the children to record initial and final reflections on the set Topic and Proposal
- **Contextual discussion:** background discussion on the Topic to make sure all the children had a similar level of understanding
- **In-depth reflections:** discussion of the Topic and potential implications for children's current online experiences
- **Scenarios:** presenting children with personas of other children to get them thinking about wider societal implications of the Proposal and risk of encountering harmful content¹⁶

¹² Topic 3: Tools to give users control over interactions - proposed measures giving children control over their response to harmful content and their interactions with other users.

¹³ Topic 1: Access to online services and sites - proposed measures controlling or restricting children's ability to access certain online services, or content harmful to children. Topic 2: Online services should prevent children from seeing harmful content – proposed measures aimed at reducing the prominence, automatic recommendation or exposure of content harmful to children

¹⁴ Topic 4: User support – provision of clear and accessible info / guidance to children – proposed measures ensuring children can access clear and accessible information and guidance about a service

¹⁵ Topic 5: Governance and internal systems - Proposals around service policies, accountability, risk reviews and their tracking of content online

¹⁶ Please see the annex for further information on the approach and method.

Workshops

Revealing Reality hosted workshops in child-friendly settings such as youth group centres. Each workshop had 10-12 children taking part, and two researchers facilitating. While there were introductory and plenary sessions where children took part in exercises as a whole group, children were divided into two groups based on gender for the main discussion.



Figure 2: Images from the workshops of children taking part in the activities.

Interviews

Facilitators engaged children with experiences and characteristics of interest¹⁷ through a combination of one-to-one interviews (either in-person or remote) and mini groups. Given the unique needs and experiences of these groups, a smaller group or individual setting allowed for the adaptation of questions and discussions to suit individual comfort levels and communication styles, ensuring meaningful participation.¹⁸

Touchpoint 3: Final reflections

The final phase of this project aimed to close the loop of the deliberative process and gather final reflections. Children completed a short, open-response survey asking them to record any final thoughts and provide feedback on how they found taking part in the project.

Touchpoint 3 was completed in the children's homes 1-2 weeks after Touchpoint 2.

Ofcom and Revealing Reality will also contact children after this report is published to share more information with them about what impact their participation and Ofcom's consultation has had on Ofcom's policy development.

Implications of the methodology for report findings

The approach taken in this project required being transparent with children about Ofcom's role as the regulator for Online Safety and that they had developed the Proposals children were being consulted on. This may have had an impact on how children responded to the Proposals compared to how they might have felt if they did not have knowledge of this wider context. It is therefore important to read this report alongside other evidence about children's experiences of and attitudes towards being online.

¹⁷ Details of which experiences and interests can be found on page 6 'Consulting children with a range of experiences' and a full quota breakdown can be found in the annex.

¹⁸ A note on safeguarding: Revealing Reality had safeguarding procedures and guidelines in place in the event that children disclosed any information that put themselves or others at immediate risk of danger. This applied for the children in the interviews, and the workshops.

How to read this report

This report presents findings from a project commissioned by Ofcom to gather children's views on the draft Children's Safety Codes proposed by Ofcom. The project involved a deliberative approach with 112 children aged 8-17 across the UK, spanning three different project touchpoints.

The report is structured into several chapters.

Overall attitudes towards Ofcom and the Proposals as a whole: This chapter discusses children's general views on Ofcom's role in online safety and their support for the proposed measures.

Specific feedback on Ofcom's Proposals: These five chapters provide findings from the children about the Proposals, organised by five 'Topics'.

- Topic 1: Access to online services and sites
- Topic 2: Preventing children from seeing harmful content
- Topic 3: Tools to give users control over interactions
- Topic 4: User support and provision of clear and accessible information and guidance to children
- Topic 5: Governance and internal systems

Chapters discussing Topics 1-4 focus on specific measures and children's feedback on them. Chapter 5 provides an overarching discussion about children's views on governance and internal systems.

Throughout the report, the term 'Proposals' refers to the child-friendly version of the safety codes, which were grouped into 5 thematic 'Topics' for ease of understanding.

To ensure participants' anonymity, the children have been given pseudonyms, and personally identifiable information has not been included.

For example, quotations from a child taking part in interviews are attributed as:

"Pseudonym, age, interviews (detail inside this bracket on the specific characteristics or experience why the child was recruited for this project. For example, if children were recruited based on previous experiences of online harm, the bracket would read "online harm") (where relevant, the touchpoint the quotation was taken from)"

Quotations from children taking part in the workshops are attributed as:

"Location workshop, age range (where relevant, the touchpoint the quotation was taken from)"

Please note that this report contains trigger warnings where sensitive content is discussed, as requested by Ofcom.

The report also includes:

- A glossary of key terms
- A detailed breakdown of the methodology used
- Detailed breakdowns of the Topics and Proposals

Overall attitudes towards Ofcom and the Proposals as a whole

Trigger warning; please note there is reference to violent content in this chapter.

Most children were positive when informed that a regulator has been tasked with making the online world safer for them

While most children hadn't heard of Ofcom before, the majority were reassured to learn that an organisation was responsible for improving online safety

Few children had heard of Ofcom before. None of them had heard Ofcom was involved in online safety, instead recalling news articles or stories mentioning Ofcom in relation to TV complaints. When presented with a short video introducing the children to Ofcom and an overview of their Proposals, most of the children were happy to hear that the organisation existed. They appreciated the efforts of an organisation developing and implementing regulation to protect children online and creating a safer online environment.

“Something I didn't know when watching the video is that people are regulating online. As a 13-year-old, I feel a lot safer now. I use Snapchat, Instagram, TikTok and Facebook, and I feel a lot safer now knowing someone is online watching it and keeping us safe.” – Glasgow, 13-14 (Touchpoint 1)

“What I learnt from the video today which I didn't know before was that the Online Safety Act was signed last October, and these new safety measures are being put in place by Ofcom and they are being implemented into online safety...I was positively surprised by this, it will ensure my online safety.” – Nottingham workshop, 16-17 (Touchpoint 1)

Children also expressed positive feelings about being included in the project and having their voices heard.

“I think the fact that Ofcom want to know my views makes me feel important and known. Usually, in school, they just give you a worksheet, but here they want to hear your views and what you think.” – Glasgow, 13-14 (Touchpoint 1)

However, children also felt that responsibility for their online safety should ultimately lie with adults.

“Everyone leaves it to the kids, but we're just kids we don't know, you know? So we need someone to guide us properly through it...until we're that wee bit older.” – Belfast workshop, 14-15 (Touchpoint 2)

When asked what they would change about the online world, most of the children felt their current online experiences could be improved



Figure 3: Children's written responses to the initial activity where they were asked what they would change about the online world.

In the image above, from left to right, starting from the top row, the post-it notes read: I would change that little kids can have Snapchat and TikTok and lots of things; make sure no one is pretending they are someone else; companies taking more action to bullying; I would stop people from swearing and saying bad stuff; I would change people pretending to be a different person online; one thing I'd change about the internet is how negative slow comments are taken down; no bullying.

This question was posed at the start of the workshop, before the children were consulted on Ofcom's Proposals in Touchpoint 2. Several common themes emerged from the children's responses:¹⁹

- **Enhanced online privacy:** children expressed a need for better protection against unauthorised access to their personal information, such as emails being hacked.
- **Reduced negativity:** they wished for a reduction in "mean" interactions, including cyberbullying and online harassment.
- **Safety from "dodgy" adult accounts:** children mentioned that they wanted measures in place that would prevent adults they did not know interacting with them.
- **Content filtering:** children wanted greater control over the content they encountered, including the ability to filter out:
 - Violent and sexually explicit content – one example given was violence shared in the context of the Summer 2024 riots in the UK.
 - Irrelevant content – one example given was excessive fitness adverts.
- **Better responses from user-to-user services when reporting:** they wanted more effective and responsive reporting mechanisms to address harmful content and user behaviour.
- **Age and identity checks:** children wanted to prevent individuals from lying about their identity online, particularly adults posing as children while seeking to engage with children inappropriately.²⁰

¹⁹ Some of the concerns raised by children here refer to online harms and activities which were not in scope for consultation in this project - for example, illegal harms, more details of which can be found here: <https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/overview-of-illegal-harms.pdf?v=390985>

²⁰ It is worth noting that, as discussed later in the report, children themselves appreciated the opportunity to have mask their identity online – though when this came up it was in the context of wanting to prevent others from knowing that they are a child.

- **Spam reduction:** they expressed frustration with spam messages and bots, highlighting the need for better spam filters and controls.

When presented with the types of harmful content Ofcom aims to protect children from, most children were in general agreement with the categories.

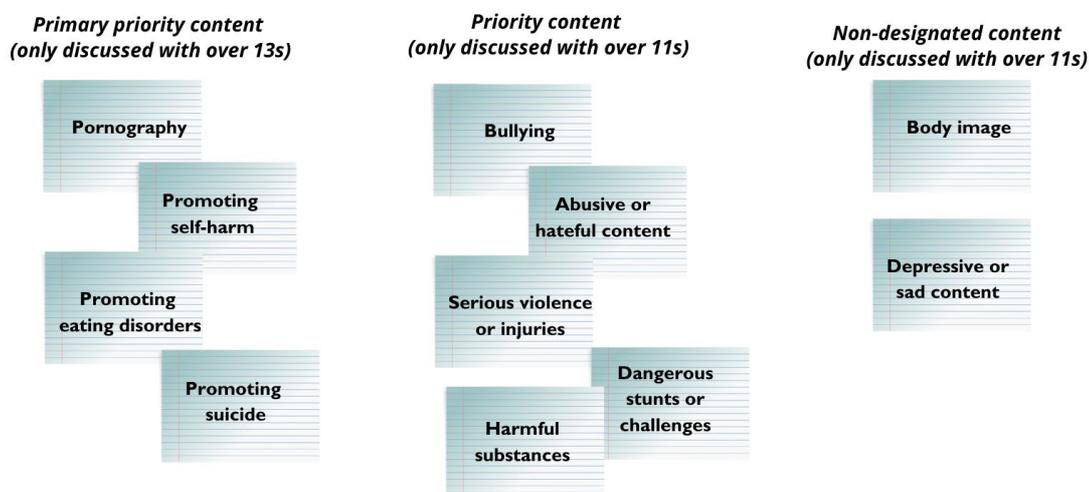


Figure 4: Introductions to the three types of harmful content (primary priority, priority and non-designated) with examples of types of content that could come under each category. These categories are set out in the Online Safety Act.

Priority content and non-designated content were only discussed with children over the age of 11, while primary priority content was only discussed with children over the age of 13. It's important to acknowledge that the categories of harmful content were only discussed briefly at the start of the workshops and interviews. Most children recognised the harmful nature of this content and saw the broader benefits of protecting children from it.

While discussing these categories, and in discussions about the Proposals, some children sought clarification on what constitutes bullying, violence, and other harmful content or behaviours. In addition, based on their online experiences, they expressed scepticism about user-to-user services' ability to accurately categorise harmful content.

None of the categories of harmful content were discussed with children under the age of 11. Instead, these workshops approached Ofcom's ideas and the associated harms on a more general level.

Children who brought up their experiences of online harm supported Ofcom's aims, often expressing regret that these protections hadn't been in place earlier

Throughout the workshops and interviews, some children brought up negative experiences they or their peers had encountered online, including cyberbullying, exposure to violent or sexual content, depressive content, and content related to body image and eating disorders.

"It's so dangerous because we are almost forced to mature quickly and we see so much that is actually bad... All of this is damaging, and social media has a large part to play... So I think these are good ideas." – Ella, 17, interviews (lived experience of harm) (Touchpoint 2)

"I really like the fact that people are helping put a stop to children seeing harmful stuff online and it prevents bullying and refrains people from getting hurt." – Sasha, 15, interviews (living in care) (Touchpoint 2)

"I think I wish I'd had these rules for myself... I would go on apps I thought were ok and my mum and dad thought were ok but there was so much harmful content on them." – Sabina, 17, interviews (online harm) (Touchpoint 2)

Children with experience of online harm supported Ofcom's aims and often cited their own negative online experiences and the impact it had on them as the reason for their support. Reflecting on their previous experiences online, many of these children wished there had been something in place to prevent them from seeing potentially inappropriate content or having harmful interactions.

It is worth noting that when consulting children on some of the Proposals, they recognised that some of them already existed in some form. For example, they had experience using some tools to control user interactions or had come across some age verification methods before. As stated above, overall, children welcomed Proposals that would enable them to be safer online, but did emphasise that they didn't want the onus for their safety to be placed on them. This sits within the wider reflection from most children that they supported Ofcom having responsibility for ensuring a safer online environment for children.

Some children were initially hesitant about how Ofcom's Proposals might limit what they could see or do online

Trigger warning: please note there is reference to violent content in this chapter.

Some concerns were raised about limiting children's choices online

Across the workshops and interviews, some children expressed concerns that online safety measures might limit their online freedom and access to content. They valued the ability to explore and engage with diverse content online and worried that restrictions could hinder their online experiences.

Some of the children aged 12-17 were concerned about missing out on content that their older friends could access. This concern may stem from a desire for social inclusion and a fear of missing out.

"I think it would be unfair, if you had older siblings and realised you couldn't see what they see." – Nottingham workshop, 16-17 (Touchpoint 2)

"It would be a bit annoying, I would feel as though I'm missing out on something." – Maidenhead workshop, 12-13 (Touchpoint 2)

"I think my older brother would want to see what's happening [in the Belfast riots] and he'd probably be annoyed if he couldn't see what's happening in the area." – Belfast workshop, 14-15 (Touchpoint 2)

"It's good for younger kids, but the mental age between 16-18 is basically the same. I would feel okay if my feed changed, but I also think I should be able to see it." – Nina, 17, interviews (Touchpoint 2)

"I wouldn't like if I can't see it all of a sudden one day." – Umar, 17, interviews (Touchpoint 2)

Those aged 8-13 expressed annoyance at the possibility of being prevented from seeing certain content due to age-based restrictions as they felt they were mature enough to handle a wider range of content. However, it is important to note that children aged 8-11 in the sample were not shown categories of harm and these were not discussed with them. Instead, Ofcom's Proposals were discussed more generally.

"Bad idea, because I want to be able to watch Simpsons." – Twickenham workshop, 9-10 (Touchpoint 2)

"It's a bit unfair on children to not see some things, like some children like scary things." – Twickenham workshop, 9-10 (Touchpoint 2)

It is also worth noting that some children under 13 were already accessing user-to-user services, which is likely to have impacted their views as the Proposals would effectively remove their ability to use services where the required minimum age is 13.²¹

Despite these concerns, it was also striking that when children were shown Proposals that related to *protecting* them from harmful content by making it harder to access, rather than *preventing* access to it altogether, children questioned why content that is identified as harmful would not just be removed.

"I feel like removing altogether is best and if it's harmful why is it there at all? Why not just remove it?" - Nottingham workshop, 16-17

Children were mainly concerned about whether the Proposals would be consistently and uniformly applied

²¹ Thirteen is the most common age at which users are allowed to have social media accounts across services.

There were some concerns about whether it was appropriate for Ofcom's Proposals to take different approaches to different types of harmful content, as well as about the idea of treating all children under 18 in the same way, regardless of maturity levels (see below). However, there was more emphasis in children's feedback about fairness and consistency, which they seemed more concerned about.

"I wouldn't be annoyed if none of my friends could [see and access content] ...but I would be annoyed if one of them did." – Twickenham workshop, 9-10 (Touchpoint 2)

"If none of my friends could use it, I wouldn't mind if I couldn't use it [18+ site], we'd just find a different one." – Joe, 13, interviews (influencer) (Touchpoint 2)

The emphasis on a level playing field primarily stemmed from a fear of missing out. Children felt that it was acceptable if none of their peers had access to certain content, but it would be unfair if some friends 'got away' with having more access to online spaces than others.

When discussing Proposals about controlling interactions with other users, the children acknowledged the importance of having 'control' tools such as declining group chat invitations, but still wanted to be able to see what was being said on group chats. It seemed that the children who were in favour of controlling interactions wanted the benefits of being 'in the know', without being seen or interacting with other users. This illustrates a key tension between the level of information children wanted due to their fear of missing out, and not defeating the purpose of having this Proposal in place.

Children essentially worried that if some of their peers could access certain content or user-to-user services while they couldn't, it would create social divisions and feelings of exclusion. A related concern was that this exclusion might also take place if measures were not applied effectively enough by online services, making it easier for children to circumvent the measures.

Some children reported that over-16s, and more 'mentally mature' children might feel restricted by these Proposals

While some children questioned the fairness of applying online safety measures uniformly to all under 18s, there were a few key differences of opinion based on age within the sample.

Some children recognised the developmental differences between younger and older children, pointing out the distinction between a 17-year-old on the cusp of being an adult, and a 12-year-old.

"It's a good idea but there isn't much difference between 17-year-olds and 18-year-olds, it's kind of like drinking alcohol. You're not meant to, but if you're 17 and your family says you can have a drink then that's fine – it's you or your parents' choice." – Nina, 17, interviews (online harm) (Touchpoint 2)

Other children felt that age was an arbitrary method of deciding what was appropriate for children, suggesting that maturity levels were a better indicator.

"It really depends on the background of the user and what they have or haven't been exposed to. I think it should be a quiz of what you're comfortable with seeing." – Maidenhead workshop, 12-13 (Touchpoint 2)

"Some age restricted things are really more dependent on maturity, like someone can be 16 and mature or be over the 18 limit and be immature." – Nottingham workshop, 16-17 (Touchpoint 2)

"If the government has ruled content as 'dangerous' then maybe children shouldn't be exposed to it, but some children might have more mature interests and should be able to access this kind of content if they wanted to." – Belfast workshop, 14-15 (Touchpoint 2)

A couple of children suggested that parents were better positioned to judge their child's maturity level and make decisions about appropriate content and access to user-to-user services.

"I feel like if we're talking about specific content, parents should get to decide what their kid sees." – Nottingham workshop, 16-17 (Touchpoint 2)

Several of the older teenagers (e.g., over 16) who had been online from a young age reflected on their experiences and recognised the potential risks they had been exposed to. They expressed support for age assurance, acknowledging that younger children under 12 might not fully appreciate the potential dangers.

Umar, a 17-year-old who had experienced online harm, commented: *"I'm only waiting a year, so I wouldn't care. When you're young and restricted to do things, you're annoyed about it and don't really appreciate how it's helping you."* (Touchpoint 2)

Lara, another 17-year-old with experience of online harm said: *“Having social media is a way to act older. I could speak to my friends and saw everyone’s life. But when you’re older, you realise it’s not all that; it’s not worth it all. I wish I had never ever joined it... it’s very fake and damaging. They romanticise things that shouldn’t be romanticised, like eating disorders... imagine that coming up on your feed. They should change the age that people can go on social media.”* (Touchpoint 2)

Children over 15 who had experienced harm online drew on their previous experiences, reflecting that, in hindsight, age assurance measures would have protected them from encountering harmful content and interactions.

Lara had previously seen, and engaged with, self-harm, suicide and eating-disorder content. She reflected that seeing this content influenced her offline behaviours and everyone, including children and adults, would benefit from being protected against suicide and self-harm content.

Reflecting on her own early exposure to social media, Lara said: *“It takes a while to realise it’s not all about followers, it’s about keeping yourself safe...I don’t even think older people should see things like suicide and self-harm.”* (Touchpoint 2)

Some children also recognised that when they had been younger, they were overly confident about their own maturity.

There were some questions about what kind of content will fit within the definitions in the Act, and whether it would be accurately tagged or identified

Children frequently questioned how services would define content as harmful and how these definitions are determined. Based on their current experiences of content moderation, the children were sceptical about how well online services could do this effectively. They highlighted the need for nuance in content moderation, recognising that some content considered harmful might also be educational or informative.

“What counts as harmful? In some ways it might be over moderated. For example, cooking, you might use a knife but that might not be allowed to be shown.” – Daphne, 15, interviews (influencer) (Touchpoint 2)

“How are they going to decide what’s harmful? I remember revising for my biology exam and pictures were blocked, but that content is different from fighting and violence.” – Nottingham workshop, 16-17 (Touchpoint 2)

A key example raised was the depiction of violence in horror films. While such content might be categorised as harmful, children argued that it can also serve as a form of entertainment.

“Sometimes they have clips of horror films [on TikTok]. They have violence, but it’s fine.” – Maidenhead workshop, 12-13 (Touchpoint 2)

Children also emphasised the subjective nature of harm, recognising that what might be harmful to one person may not be to another. They questioned how user-to-user services would navigate these complexities and ensure fair and consistent moderation.

“It’s hard. How will Instagram or TikTok know what is harmful and what is not. Like I know that they put a lot of sensitive content warnings and I only click with sensitivity, but each person’s different, going to find different things triggering.” – Ella, 17, interviews (lived experience of harm) (Touchpoint 2)

Several children expressed concerns about the potential for mistakes when categorising and over-moderation. One child questioned the reliability of human moderators, suggesting that artificial intelligence might be a more objective approach:

“I think it’s good, but I don’t know if it will be effective. Who will be checking? It might be better if they used AI, not bad ones like in ‘The Mitchells vs. the Machines,’ [a children’s film about a robot] but a good one. Because humans can make mistakes.” – Elijah, 13, interviews (SEND) (Touchpoint 2)

Access to online services and sites

Feedback on Topic 1

Proposed measures	Proposal shown to children	
	Summary	Detailed breakdown
Access to online services and sites Proposal A (AA1, AA2)	“Under 18s should not be able to access user-to-user services if most of the content is harmful to children”	“User-to-user services should stop under 18s from going on the service if its main purpose is to show types of content that the law says is harmful to children. This can be done by asking users to prove they are over 18.”
Access to online services and sites Proposal B (AA3, AA4)	“User-to-user services that show any content the law says is harmful to children, should not let under 18s see this content but should let them see other content”	“User-to-user services should stop under 18s from seeing types of content the law says is harmful to children, even if they can see other content. This can be done by asking users to prove they are over 18”
High-level overview for younger workshops	Whilst children aged 13+ who discussed Topic 1 were shown the above text about the Proposal, children in one group, from years 4-5, were introduced to a high-level version of components of Topic 1 and Topic 2 in one session ²² . This involved: <ul style="list-style-type: none"> • Introducing them to the idea of age restrictions both in terms of online services and broader age-restricted places/content • Gathering their reflections on online services checking users' age and different methods of age assurance • Understanding how they would feel if access to certain sites/services were limited • Understanding how they would feel if certain content was limited 	

This section presents findings about Topic 1 holistically rather than by individual Proposal to reflect how this Topic was discussed in the workshops and interviews²³.

²² More detailed feedback on Topic 2 is provided in the next chapter.

²³ Later chapters will examine each Proposal separately, particularly for Topics like Topic 3 where the Proposals are more distinct.

Overarching feedback on Topic 1

Trigger warning: please note there is reference to violent content in this chapter.

Almost all children consulted on these measures reacted positively to the idea of preventing under 18s from accessing services that primarily host content intended for over 18s, or from accessing content intended for over 18s when on a service. Generally, the children supported stronger and more robust age checks to access services and content but had concerns around how effectively this would be implemented.

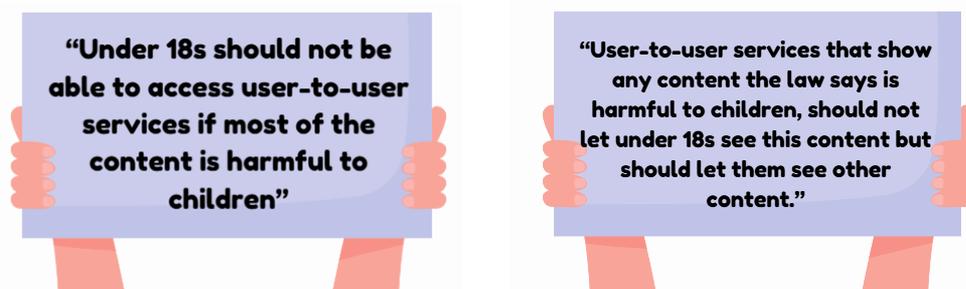


Figure 5: Descriptions of Topic 1 shown to children during the workshop.

Overarching feedback on Proposal A:

- Most children trusted that user-to-user services where most of the content is harmful to children would be accurately identified and be restricted from children.
- Most children were positive about the idea of not accessing services that were focused on showing content the law says is harmful to children.
- The children recognised how these measures were aimed at protecting children from encountering harmful content, with a few reflecting that this practice should already be in place.

Overarching feedback on Proposal B:

- Most of the children also liked the idea of having continued access to user-to-user services, with appropriate content restrictions in place.
- The children reacted positively to this sub-group of measures and saw these Proposals as a positive way to continue enjoying online services while being protected from harmful content.
- A few children also mentioned that this Proposal was a good middle ground for keeping children safe online while allowing them access to services they and their peers use.

Children under the age of 12 who were consulted on this Topic discussed it at a higher level. For these workshops, facilitators prioritised building context and children discussed the concept of age assurance more broadly.

Overall, most children felt that age restrictions were necessary for keeping children safe online

Trigger warning: please note there is reference to violent content, suicide and eating disorders in this section.

Almost all children consulted on these measures reacted positively to the idea of preventing under 18s from accessing services or content intended for over 18s

All children in the sample had access to user-to-user services, such as TikTok, YouTube, and Instagram. Most of them were using these services daily.

Social media is where many of these children consume content they enjoy and communicate with their friends. However, many children also reflected on the downsides of using these services. For example, many children

reported having seen inappropriate and potentially harmful content on social media. This ranged from violent content, such as fights being shared on group chats or gore content, to content promoting eating disorder behaviours. Overwhelmingly, children felt that this was out of their control, and they clearly did not want to see this type of content.

"I don't feel like I have much control [of my feed], I would feel better if I was scrolling through knowing stuff I don't like won't happen or come up." – Stockport workshop, 11-12

Most children were therefore positive about the idea of being protected from harmful content and welcomed Proposals related to age assurance.

"Sounds very reasonable and it helps protect minors. It's reaffirmed by the idea that for children online, having age verification is a positive improvement." – Nottingham workshop, 16-17

Children of all ages reported that they had been exposed to inappropriate content and assumed others had been as well

Some of the older teenagers aged 16 and above were concerned that increasingly younger children, under 12, were now being exposed to inappropriate content. This was based on instances they had heard about, or from experiences of younger siblings. Being concerned about this led many children to say they supported stricter age assurance measures for social media.

"It shouldn't be seen by under 18s because then it might like create an image of themselves of how they should be and pose risks to them." – Amaya, 13, interviews (online harm)

"My brother's ten, he loves to go on social media [to] reach out to his friends. But I don't think he understands the consequences." – Cardiff workshop, 15-16

"It [Proposals on age assurance] shelters young people, at that age you're more vulnerable to be influenced by bad things" – Nottingham workshop, 16-17

"I think it's a good idea to keep kids under 18 restricted to what they are watching because, a lot of kids see content they shouldn't see from a young age which could scar them or give them wrong the ideas." – Umar, 17, interviews (online harm)

Some of those aged 16 and above in the sample also reflected that they had seen inappropriate and harmful content when they were younger. While it was commonplace for their peers to be exposed to these types of content, many reflected that, in hindsight, they should not have been able to access some sites or content at all.

"When I first got social media I felt a lot older. I went on people's lives [livestreams], kept up with my friends, it's quite a fun thing when you're younger, when you're older you kind of realise it's not all that, I wish I had never ever joined it because then I wouldn't need it... I think it's fake, damaging, romanticising things you shouldn't be, there was one girl on TikTok romanticising eating disorders, she had a massive platform telling people what she did to keep down her weight, that's so damaging." – Lara, 17, interviews (online harm)

Lara's feedback also reflected a wider trend in the sample. Those who previously experienced harm online were especially in favour of strict age assurance measures.

"I think this idea [Proposal B] is a good idea. I think that people lie about their age to use apps and it's actually very easy...me and my friends sometimes see things not right for our age...So they should check your age." – Amaya, 13, interviews (online harm)

In Nina's case (case study on p.27, her experience of being contacted by an adult online, and also previously seeing self-harm content on user-to-user services led her to believe that age assurance measures need to be stricter and more accurate.

Some children also supported age assurance because they thought it might prevent inappropriate contact from adults²⁴

²⁴ Information about Ofcom's codes of practice addressing forms of inappropriate contact from adults that would amount to illegal harms can be found here: <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/codes-of-practice/>

While the Proposals children were shown did not discuss the idea of stopping adults from pretending to be under 18, children in the project thought the Proposals might help to prevent this. Facilitators primarily asked the children about access to content and user-to-user services in the context of preventing under-age children from accessing or seeing content. However, several children, unprompted, also brought up the issue of adults with bad intentions contacting children online. These children were positive about age assurance measures mitigating this inappropriate contact, as well as preventing exposure to inappropriate or harmful content.

“I feel like they’ve come up with this idea to stop paedos.” – Twickenham workshop, 9-10

This was especially the case for children with previous experience of inappropriate messaging online.

“I think that every social media app should have age verification because it would also stop other situations from happening, for example old men pretending to be young to take advantage of younger children. Anyone could lie about their age, and I don’t like that.” – Lara, 17, interviews (online harm)

Overall, children were strongly supportive of age assurance and the role it could play in protecting children from harmful content and inappropriate contact with adults.

A minority of children were frustrated at the prospect of not having access to content

For example, when facilitators asked the younger boys in one group how they would feel if they lost access to content deemed harmful to children they shouted back: *“No!”*, and one boy explained *“It would be so annoying and unfair.”* – Twickenham workshop, 9-10

A few of the children aged 14 and above also pointed out that they might want to see potentially harmful content and would potentially be frustrated if things were removed from their view.

“There are some things that are violent and gruesome, but it’s just part of the news... or history sometimes has a lot of that...I should be able to see that if I wanted to.” – Belfast workshop, 14-15

It is worth noting that at the time of workshops (summer 2024), there were riots in cities in the UK, and children reported seeing violent content related to this. While children said they would generally not like to see violent content, a few reflected that it might be necessary to see this content depending on the context. In this specific case, a few of the children felt that user-to-user services were portraying a more accurate picture of the riots and felt that having access to this content was important.

Some children were unsure about what they would do if this Proposal went forward when asked to share their age online

Some of the discussions with children touched on other aspects of age assurance, identity verification and data protection that children thought might be affected by Ofcom’s Proposals.

Some children thought it was reasonable to verify users’ ages in order for them to access content for over 18s, but had concerns about what impact this might have on under 18s. They did not necessarily think it was relevant for them to provide their own ages, as long as the service knew they were under 18. However, they expected that they might be asked to provide this given it was common for them to be asked for their age when signing up to a new online service.

Children were wary of sharing too much personal information, often echoing common online privacy concerns

Some children expressed concerns about sharing their real age online due to factors including parental guidance and a desire to protect personal information. Many younger children under 12, echoing advice received from parents and schools, believed that sharing their age online may be giving social media companies or other users too much information.

“It’s not very necessary to give them any more information than they need. A police officer came into school to talk to us about online privacy, and if you put your age in other people can know how old you are, and I don’t think that’s anyone’s business.” – Tilly, 15, interviews (lived experience of harm)

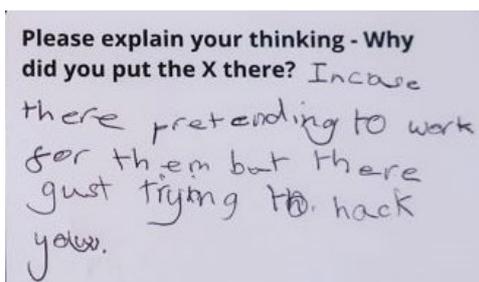


Figure 6: A child's answer to the private response question asking whether Topic 1 was a good idea. This response reads 'in case there pretending to work for them but there just trying to hack you.'

Some children also raised concerns about the potential for scams and misuse of information.²⁵

"People who make untrustworthy websites can do that method of quote unquote 'age verification' but then just giving your details out." – Nottingham workshop, 16-17

"If you share your bank details [in order to verify age] then scamming could become a norm." – Nottingham workshop, 16-17

While some of these concerns seemed to echo parental or school advice, a few children spoke about personal experiences, such as being scammed by sites requesting bank information.

"On Vinted I reported someone for trying to scam me, they updated me that they'd taken actions against the person because they violated the community guidelines." – Bea, 16, interviews (lived experience of harm)

These concerns emphasised the need for secure, trustworthy and effective age assurance methods that prioritised keeping personal information safe.

Some children were worried that providing their real age may leave them open to more risk

They highlighted the risk that if you are transparent about your age online, you may be more likely to be targeted by adults with harmful intentions. So, while giving their real age might protect them from certain content they may not want to see, some children thought this may also leave them more vulnerable to this kind of harmful contact.

"You know when parents tell their kids 'when you're setting up an account put a fake date of birth', what if you're a child in an orphanage, you have no one to tell you to put in a fake date of birth... kids like that the only thing that can stop them being harmed is to make sure they put in a fake date of birth." – Amir, 17, interviews (living in care)

Amir was a child in care and perceived children in care to have less guidance on how to stay safe online. For these children, Amir felt that falsifying their age might be the only way to stay safe from harmful and inappropriate interactions online, even if it means potentially being exposed to inappropriate content.

Some children, as mentioned in the section above, didn't see this as a tension, instead seeing age assurance as something that could also mitigate harmful contact from adults, if all users were required to verify their age i.e. adults could no longer pose as children.

Children felt unsure about how effective future age assurance methods could be

Most of the children reported that the age checking they had experienced online was ineffective

Most of the children, when asked about their experiences with existing age assurance measures, highlighted how easy they were to circumvent.

"Everyone just lies about their age, you could just fake your age." – Stockport workshop, 11-12

"You can just lie, I'm probably some really old person. I just scroll back as far as possible, oh yeah, you're 209 years old but they don't ever question it." – Nottingham workshop, 16-17

Many children criticised the current age checks they had experienced, finding them ineffective. For example, where the age verification in place amounted to self-declaration of age. They also pointed out that ages were only checked when an account is first created, and even then, they said lying about a user's age is easy. The children also reported there being a culture of circumventing age checking measures among their peers.

²⁵ The answer reads 'In case they're pretending to work for them but they're just trying to hack you'.

Children expressed doubts about whether age assurance methods that may be used in the future would be effective enough

Building on their concerns about how easy it currently is to circumvent existing age assurance methods, the children were initially sceptical about how user-to-user services could reliably check a user's age. They struggled to envision a truly robust and effective age assurance system, with some reflecting *"there will always be a way around it"* regardless of measures put in place.

However, they were more receptive when facilitators suggested some methods user-to-user services could hypothetically use that may be more robust. Facilitators presented children with stimulus of different methods for checking ages, which included: ID checks (e.g. passport), verifying age through mobile networks, facial scans to estimate age, banking checks, and using content consumption patterns to estimate age.²⁶

While acknowledging the potential limitations of some age assurance methods, children also expressed optimism about the potential for improvement. They recognised that certain methods, such as using official documents like passports or driver's licenses, were harder to *"get around"*.

"ID checks are definitely the most reliable, I mean you can get fake IDs but if you're getting fake ID you're probably older anyways." – Cardiff workshop, 15-16

"I know some people will use their parents' ID, or their older sister's ID. So how do you know it is your ID?" – Bea, 17, interviews (lived experience of harm)

Some mentioned that ID checks could be combined with facial scans, or other verification methods to make them more robust. A few children suggested that user-to-user services could use the user's content consumption patterns, comparing them to others of the same age, to more accurately estimate age.

"If you look at what different age groups are searching on social media, or by using algorithms, that could work." – Nottingham workshop, 16-17

However, some still felt that methods relying more on estimation would be less reliable and may lead to errors.

"Some folks look older. My brother is fifteen but looks twenty-one." – Sabina, 17, interviews (online harm)

Children had some concerns about how content would be identified as harmful

When discussing Proposal B, most children questioned how accurately content would be tagged and categorised as 'harmful' in order to prevent them from seeing it

Across the workshops and interviews, a common concern was whether user-to-user services would be able to accurately identify content as harmful. Many pointed out different ways that content could go under the radar of current moderation systems.

There was a general lack of faith in existing tagging methods, as many children said they had seen potentially harmful content on user-to-user services.

Some children emphasised the potential grey areas in categorising content as harmful

Beyond the technical challenges of tagging harmful content, children also highlighted the nuances and 'grey areas' inherent in categorising content as harmful. While children reacted positively to the broad definitions as set out in the Online Safety Act of potentially harmful content, many pointed out that there is nuance and complexities with these²⁷.

²⁶ These methods were selected as illustrative examples of age assurance methods, including some which at the time of fieldwork, Ofcom had consulted on as potentially capable of being highly effective.

²⁷ The children were presented with a high-level description of the content harmful to children as set out in the OSA. This was done for ease of understanding to ensure productive discussion.

For example, violence was brought up by the children as a category of harmful content that had a lot of grey areas within it. A common example was clips of gory and violent films, or shows being shared on user-to-user services.

"There's things like horror films that are violent. Technically they're for over 15 or over 18 but they're not harmful. There's a difference between, like, inappropriate content and bloody or violent content." – Maidenhead workshop, 12-13

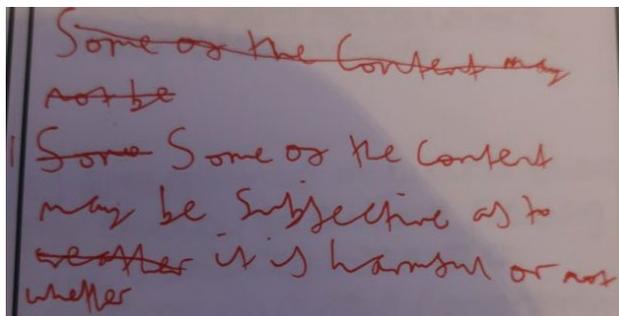


Figure 7: A child's answer to the private response question asking whether Topic 1 was a good idea. The response reads 'Some of the content may be subjective as to whether it is harmful or not'.

While acknowledging the violent nature of some content, some children did not consider it inappropriate or harmful and believed they should retain access to services, especially since it was accessible on other services like video-on-demand and live TV. Overall, there was a sense from children that some content may be age inappropriate, and some may be inherently harmful, and these should be treated differently.

A few children also wanted to be provided with clear explanations for why specific content restrictions might apply to them in terms of what would be classified as harmful for them. This was primarily due to the perceived subjectivity of content moderation, and they sought to understand the criteria used by services to determine what constitutes harmful content.

Case study: Nina, 17

Trigger warning: please note there is reference to violent content and suicide below.

Nina, who was consulted on Topic I, Proposal B, was a child who has seen a lot of violent content on social media, from school fights to more explicit content.

A particular piece of content she brought up was a live stream where a man violently died by suicide. Nina saw this video when she was 13.

“When I was like thirteen or something, I saw a video of a man. He was streaming and he got a gun and he shot himself. I was traumatised.”

This experience has stayed with Nina, and she spoke about how this type of content wasn't uncommon. Her current social media feeds featured content on self-harm, suicide, and graphic images of sickness and disease.

Nina referenced her “traumatising” experience as shaping her views on online safety, believing that stricter measures would help protect young people.

“I know it's hypocritical because I was 12 when I had Snapchat or 10 or 9 when I had musical.ly [...] but I don't think 9-year-olds, and 10-year-olds should have access to TikTok.”

Nina supported age assurance measures on social media content and thought that it was a great idea overall. She emphasised the importance of eliminating harmful content, though recognised that age assurance needed to be more robust as the current systems in place are easily circumventable.

However, assuming that the age assurance Proposals were effective, she estimated that 30-40% of her social media feed would change.

While acknowledging the potential benefits of the Proposals, Nina also pointed out the potential drawbacks. She worried that age assurance could potentially lead to a false sense of security, if inappropriate content was not properly flagged. She also questioned the limit of being 18 years old to see mature content, as she believed that there was not a significant maturity difference between 16 and 18.

However, overall, Nina felt Ofcom's proposal would keep children safe from harmful content. She even suggested implementing stricter age limits on internet access altogether, suggesting that primary school children should not be allowed on social media services at all.

Preventing children from seeing harmful content on online services

Feedback on Topic 2

Proposed measures	Proposal shown to children	
	Summary	Detailed breakdown
<p>Preventing children from seeing harmful content on online services</p> <p>Proposal A</p> <p>(AA5, AA6, RS1, RS2, CMI)</p>	<p>“User-to-user services should use content moderation and/ or recommendations to help stop under 18s seeing content the law says is harmful to children”</p>	<p>“User-to-user services should not recommend content (e.g. on a ‘For You Page’ or ‘Suggested posts’) to under 18s that could be harmful to children under the law. Depending on how harmful the content is, it should either not be recommended at all to under 18s, or it should be lower down on their feed.”</p> <p>“User-to-user services should use content moderation so that under 18s can’t see content the law says is harmful to children. They should take action quickly e.g. removing it for under 18s, when they know there’s content that is harmful to children.”</p>
<p>Helping to prevent children seeing harmful content on Search services</p> <p>Proposal B</p> <p>(SM1, SM2)</p>	<p>“Search engines should remove, blur or push content down search results to help stop under 18s seeing content that’s harmful to children”</p>	<p>“Search engines should take action against content the law says is harmful to children. They should blur and/or push the most harmful content down in search results and should consider doing this for other content the law says is harmful to children as well.”</p> <p>“If they think a user is under 18, search engines should make sure the user has a safe search setting turned on which removes content that the law says is the most harmful to children. Under 18s should not be able to turn this setting off.”</p>
<p>High-level overview for younger groups</p>	<p>Children in the Twickenham workshop, ages 9-10, were introduced to a high-level version of components of Topic 1 and Topic 2 in one session. This involved:</p> <ul style="list-style-type: none"> • Introducing them to the idea of age restrictions both in terms of online services and broader age-restricted places/ content • Gathering their reflections on online services checking users' age and different methods of age verification • Understanding how they would feel if access to certain sites/ services were limited • Understanding how they would feel if certain content was limited 	

Overarching feedback on Topic 2

Most children consulted on this Topic generally supported the idea of having systems in place to prevent under 18s from seeing harmful content. They reacted positively to user-to-user services using recommender systems and content moderation to protect children online. However, there were concerns around whether these Proposals were robust and effective, including whether it was appropriate to make it harder to find harmful content, as opposed to simply removing it.

Overarching feedback on Proposal A:

Proposal A included measures related to user-to-user services

- Overall, children supported the idea of having measures in place to reduce the likelihood of harmful content appearing on their feeds.
- Using content moderation and not recommending harmful content were seen as positive actions to take, though there were concerns around how well online services could consistently identify harmful content.

Overarching feedback on Proposal B:

Proposal B included measures related to search services

- Removing harmful search results online was seen as a positive action and children recognised the importance of this.
- However, they were sceptical about the efficacy of downranking and blurring harmful content.

Children under the age of 12 who were consulted on this Topic discussed this Topic at a higher level. For these workshops, facilitators prioritised building context and the children discussed moderation / recommender systems more broadly.

Most children supported Proposal A and the idea of preventing children from seeing harmful content through content moderation and recommender system measures

All the children had some understanding of how their online behaviours influence the content shown to them



Figure 8: Description Topic 2 Proposal A shown to children during the workshop.

Children understood that engaging with content leads to being pushed similar content in their feeds. They recognised this pattern across user-to-user services, noting some differences between services.

Children perceived Instagram as more responsive to user behaviour compared to TikTok, which they viewed as less predictable.

"With Instagram, you'll watch it even once and you'll get loads of it. Like I'll watch a baking video and then I get loads of food and cooking stuff." - Glasgow workshop, 13-14

"TikTok is so random, anything could come up which is sometimes funny, but sometimes not." - Belfast workshop, 14-15

Children described seeing unexpected content appear in their feeds, including material they considered inappropriate or harmful. We heard about children who felt they had ended up stuck in a loop of content they suggested was potentially harmful.

“I don’t even look up anything or do anything bad on Instagram but I end up in these loopholes of really bad content.” – Ella, 17, interviews (lived experience of harm)

While most children associated recommended content with user-to-user services, a few also mentioned the impact of recommendations on the content children see on search services. In a discussion about other Proposals, one girl shared an anecdote about her sister encountering inappropriate content after searching for a cocktail recipe online via a search service.

“My sister was doing this quiz game that said name a cocktail beginning with P, she searched it and Porn star martini came up, the next thing you know she was seeing bad content.” – Cardiff workshop, 15-16

Children generally supported the idea of removing harmful content from recommender feeds

Overall, children saw no issues with having harmful content removed from their feeds.

“I think it’s a good idea to keep kids under 18 restricted to what they are watching because a lot of kids see content they shouldn’t see from a young age which could scar them or give them the wrong ideas and thoughts on what they see older people do online.” – Umar, 17, interviews (online harm)

“It would really protect children from damaging things such as promoting eating disorders and unhealthy habits as it romanticises damaging things and young people don’t have enough strength to resist following trends, and they try to be like older people.” – Lara, 17, interviews (online harm)

Whilst children were positive about the Proposal, it is worth noting that they raised concerns during other discussions about why some kinds of content that are harmful to children under the law would not be removed under Ofcom’s Proposal – something which is the case under Proposal A, where some kinds of content would be pushed ‘lower’ down a feed.²⁸

Most children were in support of content moderation being used to prevent children from seeing potentially harmful content

When first presented with the Proposal related to content and search moderation at the early stages of workshops, not all children were able to properly reflect on them because they did not fully understand what content moderation was. Almost all had a good understanding of algorithms, and that certain content was pushed to them based on their previous behaviour. Far fewer knew what content moderation was. Some suggested that it might be to do with ‘checking’ content online was safe but were ultimately unable to explain what it was or how it worked.

When facilitators explained what content moderation was, most children were familiar with the idea – for example, that some content was taken down or marked as sensitive - but lacked the language to initially reflect on it. Most of them reacted positively once it was explained and thought it would be important in preventing them from encountering harmful content. Some said that it would provide them with a sense of security and comfort, knowing that user-to-user services were ‘looking out for them’ and that they would not encounter harmful content.

However, some children had concerns that existing content moderation is too reactive and overly relies on user reports. For these children, it was not clear to them whether Proposal A would lead to existing moderation improving or not.

“I think a larger problem with social media is most of the content moderation is done by the people who are using it, reporting stuff.” – Glasgow workshop, 13-14

For some children, this perception that moderation was largely driven by users was a concern because they did not feel it was proactive enough and more could be done earlier on to prevent harmful content appearing on children’s feeds.

²⁸ Under Proposal A, this relates to PC (priority content), but this detail wasn’t included in the Proposal put to children, for ease of understanding. Instead it was noted that there would be variation depending on ‘how harmful’.

However, when children reflected on the potential of future moderation, some saw it as a chance to reset the expectations of what kind of content can and should be seen on the user-to-user services they use.

“Content moderation is the way forward and then hopefully if things do get removed or banned people will realise and create a new social norm on the platform.” – Ella, 17, interviews (lived experience of harm)

A few were concerned about the unintended consequences of over-sheltering children from harmful content

Some children expressed concerns that protecting under-18s from all harmful content could leave them less prepared to handle such material if they encounter it later. They suggested this approach might make young people less prepared to deal with challenging topics.

“People grow up quite sheltered and become sensitive to certain topics with age restrictions.” – Belfast workshop, 14-15

These children proposed gradually introducing age-restricted content based on maturity levels, rather than having a single age threshold.

“I feel like they should slowly get exposed to it, at 16 you're quite mature.” - Nottingham workshop, 16-17

“It isn't as black and white as I thought it was. It may be more useful to stagger content in terms of what age can access it, as it is not beneficial to see everything at once.” – Bea, 17, interviews (lived experience of harm)

The children generally viewed the moderation and safe search settings outlined in Proposal B as positive steps towards protecting children on search services, though had questions on its implementation

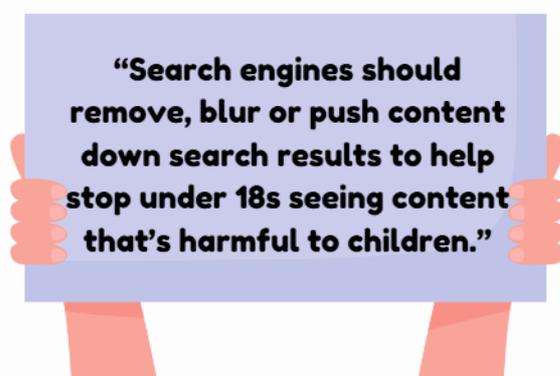


Figure 9: Description of Topic 2 Proposal B shown to children during the workshop.

Making search results safer for children was responded to positively.

Children viewed Proposals taking action against harmful content in search results as a way to create a safer online environment. They suggested this approach could limit access to content that promotes harmful behaviour or views of the world.

Children also noted that this Proposal could improve their search experience by reducing irrelevant results and providing more age-appropriate information.

“In school the websites are set to filter out loads of search results, yes sometimes it's annoying but I'd way prefer that to seeing something really graphic.” – Nottingham workshop, 16-17

The Proposal on a safe search setting for under 18s was broadly supported

Children largely welcomed the safe search settings Proposal as a way to directly filter out harmful content and so remove it from their search results. Some children had prior experience with safe search settings, whether enforced on school devices, requested by parents, or chosen personally.

Ella, a 17-year-old with lived experience of harm, described her school's approach: *“They have that [safe search] on in school. They won't let you search certain words like “die,” and then if you do, safeguarding sends you an email like, ‘Are you okay?’”*

Another child shared their personal preferences: *“I've got it on my phone because sometimes I don't want to see stuff. I think there's three options where you have it off, on, or a halfway point of half on, half off. I have mine so I don't see any images or videos. I can still see the titles and stuff.”* – Nottingham workshop, 16-17

Children generally expressed positive views towards safe search settings, emphasising that children should be protected from harmful content. Some felt that parents, rather than search services, should determine these settings, although they thought that parents might not always make the best online safety decisions.

Many children were concerned about the efficacy of downranking and blurring content, rather than removing it

Children raised concerns about the proposed blurring and downranking of content on search services. Many questioned why content considered harmful enough to be obscured would not be removed entirely.

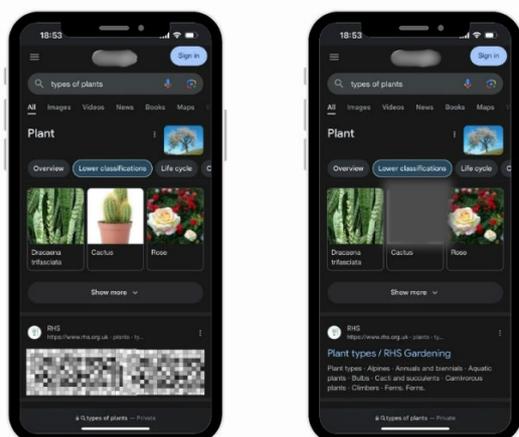


Figure 10: Mock-up of blurred content on search services shown to children during the workshop.

"This one [the search results on the left] is just a bit strange, like I'd be questioning why is my feed [search results] all blurred, I would just think it was a glitch... the removing one's better because then you just don't know it's there." – Nottingham workshop, 16-17

Children expressed doubts about whether downranking would prevent them from accessing harmful content, noting they would likely encounter it eventually through continued scrolling.

"You're going to find it anyway, so what's the point." - Bea, 17, interviews (lived experience of harm)

Facilitators showed the stimulus in Figure 10 to help the children visualise how Ofcom's broad ideas might look. Children across all age groups indicated that blurring content could spark curiosity and lead to attempts to access it. This perspective was shared by children from ages 8-10 through to older teenagers. Their concerns highlighted that this Proposal could in some cases have the opposite effect to what is intended.

"If it was blurred, I think I'd want to click on it more. That's really bad but I'd be intrigued." – Ella, 17, interviews (lived experience of harm)

"If I saw something was blurred it would make me curious and I'd want to know what it was about." – Twickenham workshop, 8-10

"It shouldn't be blurred it should just be removed... You know when something is hidden it just makes it more tempting." – Nottingham workshop, 16-17

Case study: Elijah, 13

Elijah was one of the children who had characteristics of interest for the project (SEND). He was consulted on Topic 2, Proposal A and spoke about content moderation and age assurance more broadly.

Elijah's main digital activities included gaming on his console and watching YouTube. He enjoyed watching gaming and Lego content. Elijah said he did not use social media, and only used WhatsApp to talk with his family and close friends.

Elijah was initially sceptical of Proposal A as he was concerned that *"they might not work"* or be effective. From his personal experience of YouTube, Elijah felt that moderating content could be tricky as content creators could *"sneak [explicit] stuff in"* to a longer video. While he had not experienced this himself, he had friends who spoke to him about watching seemingly 'normal' videos which would suddenly feature a short clip of violent and/or inappropriate content within the longer video.

"I quite like it [Proposal A] but there's quite a lot of sneaky ways to get past it unless it has a strong system [...] it can be a normal video with a normal title and normal photo, and then there would be a few seconds in it where there would be something inappropriate in it and then it would flash back to the normal video."

Elijah also reflected on his experience on user-to-user services. He was worried that traditional moderation, with humans, may not be sufficient enough to spot all inappropriate content and suggested that having the help of AI may make this more effective.

"I think it's good, but I don't know if it will be effective. Who will be checking? It might be better if they used AI, not bad ones like in 'The Mitchell's vs. the machine', but a good one. Because humans can make mistakes."

When consulted on the idea of age checks, Elijah felt these could be a robust method to keep children safe but based on his own understanding of current age checks, he was concerned about how effective they would be.

"There's no way to know someone's real age, but it might be better if they could scan your face, or you have to do a video of yourself for five seconds."

In addition to this, he also raised a point about how the handing over of personal information might increase the risk of data leaks, which could cause harm to adults providing their details.

While Elijah had his reservations, when prompted to weigh up the pros and the cons, on the whole, he recognised there were greater advantages to Proposal A, and generally supported the idea.

"I think the advantages are you can remove bad content on the platforms [search services such as Google, and user-to-user services] and it helps you find content that is appropriate, and you won't see bad content as much."

Tools to give users control over interactions

Feedback on Topic 3

Proposed measures	Proposal shown to children	
	Summary	Detailed breakdown
<p>Tools to give users control over interactions</p> <p>Proposal A</p> <p>(US1, US2, US3)</p>	<p>“Under 18s should have tools to use on social media like declining invites to group chats, blocking, muting and disabling comments”</p>	<p>“Under 18s should have an option to accept or decline an invite to a group chat on user-to-user services.”</p> <p>“Under 18s should have the option to turn off comments on their posts on user-to-user services.”</p> <p>“Under 18s should have an option to block and mute other users’ accounts on user-to-user services.”</p>
<p>Tools to give users control over interactions</p> <p>Proposal B</p> <p>(UR1, UR2, UR3, SD1)</p>	<p>“Under 18s should be able to easily report and complain to user-to-user services and search services about content or other users. They should be told about the next steps after complaining.”</p>	<p>“It should be easy and clear for under 18s to make complaints to user-to-user services or search providers. The service should give the user information about what happens after they’ve made a complaint and provide updates.”</p> <p>“It should be easy for all users of a search engine to report a search term that has been suggested to them using predictive text. If a reported search term might show under 18s content that the law says is harmful to children, it should not be suggested to users again.”</p>
<p>Tools to give users control over interactions</p> <p>Proposal C</p> <p>(RS3, US4)</p>	<p>“Under 18s should have a way to show they don’t like recommended content and be able to get helpful information when they take action about content that’s harmful or that they don’t like.”</p>	<p>“User-to-user services should give under 18s a way to say if they don’t like content that’s been recommended to them (e.g. ‘see less of this’).”</p> <p>“When under 18s on user-to-user services report, block, mute or say they want to ‘see less’ of or ‘hide’ an account or a type of content, they should be given information about what they’ve just done and about further action they could take to increase their safety.”</p>

High-level overview for younger groups

Children in the Trowbridge workshop, year 6, aged 10-11, were introduced to a high-level version of components of Topic 3. This involved:

- Introducing the children to the concept of providing negative feedback online and establishing definitions for blocking, muting and reporting
- Getting the children's initial reaction to the idea of developing tools for children to have more control of the content or users they see online
- Using scenarios to get the children to think about how these functions would work in practice, e.g. asking them what action they'd take if someone was being mean to them, they saw content they didn't like, etc

Overarching feedback on Topic 3

When presented with Proposals relating to tools to give users control over interactions, most children reacted positively and viewed them as useful. Some children also reported feeling a lack of control over who was currently able to interact with them online. While they saw these tools as a way to gain some control, there were concerns about how, in isolation, these Proposals put responsibility on children to keep themselves safe. This speaks to a wider sentiment across the project where children wanted more control to be taken by adults on their behalf to keep them safe online.

- While generally positive about the Proposals, most children across the workshops and interviews reported that some of them were already in place on some user-to-user services (e.g., blocking, reporting, seeing less of a type of content) and felt they were not always effective.
- The children were in favour of Proposals such as being able to accept or decline group-chat invitations, the option to disable comments, and the option to block or mute accounts. However, there were some concerns about unintended social consequences as a result of using some of the tools.
- The children reacted positively to Proposals relating to ease of reporting or complaining about content or users and receiving information afterwards (Proposal B). However, there were concerns about whether these would lead to any change in their online experiences.
- The children reacted positively to the idea of being able to show they don't like recommended content. They were generally ambivalent towards receiving information after taking action against an account or type of content. They were more open to receiving information if it related to harmful content (as opposed to content they disliked for other reasons) - albeit that there was a risk this could be triggering if they did not want to be reminded of a distressing experience.

Most children liked the idea in Proposal A of having tools to control their interactions and protect themselves from unwanted content

Most children who discussed Topic 3 Proposal A were positive about having a choice over their online interactions



Figure 11: Description of Topic 3 Proposal A shown to children during the workshop.

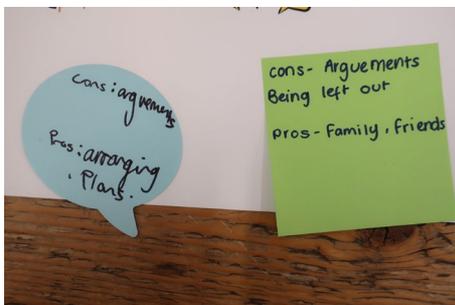
Children reported feeling a lack of control over their online experiences, from unwanted content appearing on their social media feeds to unsolicited interactions with strangers. They expressed a wish for more choice and control in managing these.

Although some children were unsure whether they would personally use certain safety features, they valued having the option to do so as it could provide them with a sense of agency and control.

“It’s good to have a more active choice.” – Belfast workshop, 14 -15

Please note that children who discussed Topic 3 in depth did not have in-depth discussions about other Topics (some of which include ideas for interventions in which services proactively remove content before children see it).

Group chats were often associated with inappropriate content, and children generally wanted more control over this²⁹

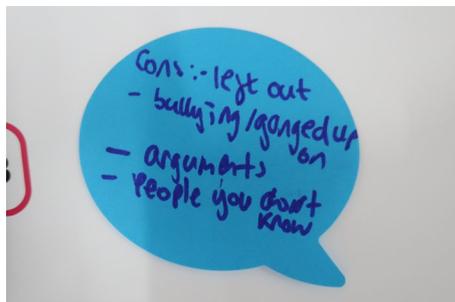


In both the workshops and the interviews, children consistently identified group chats as spaces where they encountered a range of harmful content and interactions, including violence, sexual content and contact, and cyberbullying.

“One time [a] bunch of people decided to make a group chat just to bully me and I never got the option to decline the invite... I wish I’d had the option to decline it and didn’t see the messages straight away when I opened my phone.” – Sasha, 15, interviews (living in care)

Most children agreed with Ofcom’s Proposal on providing under 18s with the option to accept or decline group chat invitations. The only exception to this was children who noted using group chats with close family and friends, where they felt that Ofcom’s Proposal was less relevant.

Some children reported often feeling apprehensive about being added to group chats, assuming they would involve negative experiences. They described being added to groups by friends, not knowing anyone else in the chat, encountering excessive



²⁹ The post-it notes read from top to bottom: cons – arguments, pros – arranging plans; cons – arguments, being left out, pros – family, friends; cons – left out, bullying, ganged up on, arguments, people you don’t know; cons – ganging up on a single person also getting involved when not wanted seeing inappropriate photos; pros – making friends, planning things, having fun, calling.

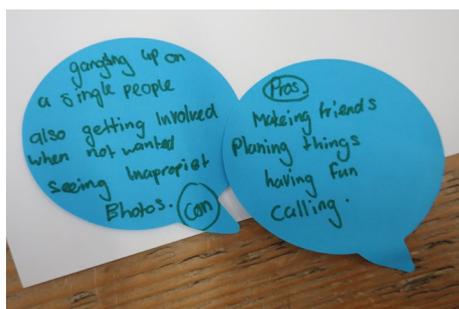


Figure 12: Children's responses when asked to share the pros and cons of group chats.

swearing and inappropriate image sharing. One girl recounted an incident where a group chat was created within her school to distribute nude pictures of someone.

Many children perceived group chats as potentially unmonitored spaces where bullying occurs and harmful content can be shared with little to no consequence. They noted that when joining or being added to group chats, they were often unaware of the potential risks. The option to accept or decline invites was seen as a valuable tool for empowering children to make informed choices about their participation and avoid potentially harmful situations.

"Because many kids don't fully understand the dangers online, they need to have the option to decline stuff when needed." – Cardiff workshop, 15-16

"Right now, people can add you without your consent and it can cause so many problems, this lets you have more control." – Cardiff workshop, 15-16

Most children wanted more control over what group chats they were in

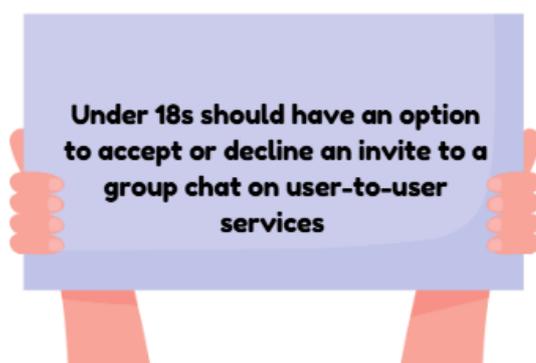


Figure 13: Description of a component of Topic 3 Proposal A shown to children during the workshop.

Children wanted more information so they could make an informed decision on whether they would like to join a group chat.

For example, they wanted to know who added them to the group, the name of the group, and if there were any mutual contacts in the group.

"I'd want to know what people were in the group chat and what it was about." – Sasha, 15, interviews (living in care)

A few children said they would like to see a preview of the messages, to decide whether the content was appropriate for them.

"I would like to see the latest messages to see what we are talking about. So if it's an argument and you see the last message you'd decline, but if they're planning like a day out and you'd be like, yeah, I'd like to join." – Cardiff workshop, 15-16

"If you don't know what they're talking about you'd probably join the group chat anyways, in case you miss out on something." – Cardiff workshop, 15-16

However, children reflected on a key tension: while they wanted more control over joining group chats, to be seen declining an invitation to a group chat could cause drama. While the idea of being able to accept or decline was welcomed, children were worried about the social implications declining might have, if, for example, someone was notified that they had declined an invite to their group chat. For this reason, some were worried about circumstances where declining an invite could have negative social consequences.

The option to disable comments was seen as beneficial to reduce exposure to unwanted interactions but children raised some downsides and practical considerations about this aspect of the Proposal.



Figure 14: Description of a component of Topic 3 Proposal A shown to children during the workshop.

Most children recognised this as an existing feature on some of the user-to-user services they used, and generally viewed it as useful. Some thought these existing features could be made more prominent.

"I feel like this already exists like when people ban words from their comments. But it should be made more obvious." - Trowbridge workshop, 10-11

Some girls highlighted that hate comments are normalised, and pointed out that some people intentionally provoke negative comments for engagement and visibility, a practice known as "rage baiting". They also raised the point that comments not only affect the recipient but also others who might see those comments. These children were

generally in support of this aspect of the Proposal.

However, some children were also concerned that disabling comments could invite accusations of being childish or attempting to avoid criticism.

"Well, if someone posts something like misinformation or something that's factually incorrect, they can't be corrected in the comment section." – Cardiff workshop, 15-16

There were also practical concerns, such as whether the Proposal would allow control over specific comments or apply to all comments. If the former, some children felt it would be too time-consuming to manage. Some suggested that a complete absence of comment sections might be preferable, encouraging independent thought.

In addition, some children highlighted that people would find alternative ways to express hate, such as through screen recording and reposting content.

"Even when you turn the comments off people will still find a way to express hate.... Like Kim Kardashian has the comments off on North's account but people will screenshot, screen record and repost the content so people can comment on the original content." – Cardiff workshop, 15-16

Some children felt that disabling comments was less relevant to them

Some of the older boys felt this Proposal was less relevant to them personally because they perceived it to be more likely that girls would experience having comments on their posts. They perceived commenting as a kind of social tool they had less experience with.

Some children also highlighted that their accounts were private, so in that way they were already exercising a degree of control over who could comment on their posts, and this Proposal therefore felt less relevant.

"I have a private account on TikTok and then I also have private videos that only I can see and I have to use face ID to get to them." – Nottingham workshop, 16-17

Some children, including but not only those who were influencers, recognised the tension between preventing harm and getting engagement

Some children wanted to increase engagement on their posts and so were sceptical about disabling comments as it was seen as counterintuitive. To them, the purpose of posting was to get people to like or comment on their content.

"I don't really care about comments, I don't read them and I wouldn't turn them off. If I get more comments, I'll appear on more people's For You page." – Joe, 13, interviews (influencer)

Overall, some children felt the impact of introducing this Proposal would be minimal, as they rarely commented or received comments themselves. While the option to disable comments was recognised as potentially useful, particularly for public figures, children highlighted its limitations.

While blocking and muting were considered important tools, children highlighted the risk of these things creating or escalating offline tensions.

Trigger warning: please note there is reference to suicide below.

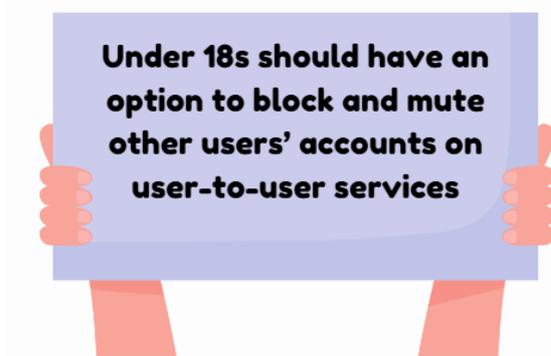


Figure 15: Description of a component of Topic 3 Proposal A shown to children during the workshop.

Most of the children understood the distinction between blocking and muting, with many having experiences of using these functions previously.

Across the workshops and the interviews, muting was commonly used to manage large group chats or silence notifications from accounts or individuals on user-to-user services. This was often done in response to excessive or “annoying” messaging rather than harmful content.

“I always mute my sister.” – Trowbridge workshop, 10-11

“We have a group chat for our year group and I always mute that because it’s just all spam.” – Trowbridge workshop, 10-11

“If there’s someone I don’t like or we’ve fallen out yeah I’ll block them, but say this person keeps spamming me or there’s a group with a ton of messages, I’ll mute that for a certain amount of time, let them get it out their system, it’s not cutting contact completely.” – Cardiff workshop, 15-16

Please put an X on the spectrum below to tell us how much you think this is a good idea for children online.

Please explain your thinking - Why did you put the X there?

1.) because people should have a choice of these options, especially under 18's safety
because it may escalate to other situations/ problems with the person such as asking why you have blocked them on other platforms

Figure 16: A child’s response to the private response form asking them to plot an X on a scale to signal how much they think Topic 3 is a good idea for children. The two Xs represent their view of this Topic pre and post discussion.

The response reads ‘(1) because people should have a choice of these options especially for under 18s safety, (2) because it may escalate to other situations/ problems with the person, such as asking why you blocked them on other platforms’.

Blocking, however, was perceived as a more serious tool, typically reserved for accounts or individual children who wanted to fully cut any contact or exposure. Most children were familiar with how to block someone, describing it as instinctive and easily accessible.

Despite recognising the value of these tools, the children also acknowledged their reactive nature and that their use, while necessary, should not have to be frequent.

Some children also expressed concerns about the potential of these tools to escalate situations or create offline drama, gossip and social tension. They questioned whether the blocked or muted accounts would

receive notifications and highlighted the importance of their actions remaining discreet to avoid increasing these tensions.

“Children when they’re in high school...there’s so much drama, they could start reporting or blocking people for no reason.” – Bea, 17, interviews (lived experience of harm)

A few children also felt that blocking and muting was not always an effective way to manage harmful content and interactions. While they saw them as helpful tools, a few children perceived blocking and muting as easy to get around if people wanted to conduct harmful interactions online.

“I blocked them all on WhatsApp but then they just started to phone me from non-caller ID, when I answered they told me to go kill myself... when you block people, they’ll always find a way around it.” – Sasha, 15, interviews (living in care)

“If he blocks them, they could make another account and message him that way.” – Cardiff workshop, 15-16

All children felt reporting tools were important and agreed with Proposal B, but remained sceptical about its effectiveness based on current experiences

All children supported the idea that reporting and complaint mechanisms should be easy to use

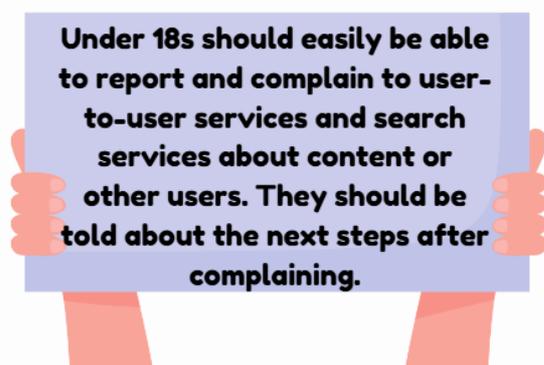


Figure 17: Description Topic 3 Proposal B shown to children during the workshop.

Children understood reporting and complaints to be different things and identified reporting as more relevant to their experience of navigating online harm. They characterised complaints as a process followed when someone wishes to raise an issue with another person or organisation - and so may or may not involve online harm. They understood reporting to be more specifically about taking action when something potentially harmful or which breaks a services rule has taken place online. All the children perceived reporting as the most serious action. They recognised that reporting might often trigger a process involving online service moderators and intervention from ‘adults’.

“Reporting is when you want the platform to ban them and it’s way more serious.” –Trowbridge workshop, 10-11

“Complaining is like ‘I don’t want to see this’ or just telling your issues to someone.” – Amaya, 13, interviews (online harm)

“If you click ‘I’m not interested’ it just takes it off for you, whereas reporting it should get it taken down...I think that it would make online a better place.” – Tilly, 15, interviews (lived experience of harm)

“Reporting is more serious, like telling an authority figure to do something. Reporting seems like a much bigger idea than complaining.” – Amaya, 13, interviews (online harm)

The children recognised the importance of these two tools, emphasising that they should be simple and accessible for users of all ages and technical abilities. Older children, in particular, mentioned that these processes should be easy to understand for younger children under 12.

“At the moment even if you block or report something other similar things are thrown up by algorithms, so making the process easier and more reactive can only be a good thing.” – Cardiff workshop, 15-16

Children wanted more information about the reasons behind actions taken and the potential consequences

Many children supported the provision of information and expressed a desire for clear and transparent communication about the next steps after making a complaint or reporting content or an account. They emphasised the importance of knowing what actions were being taken and the outcomes to expect.

“I think that it is really important for under 18s to know what to do after they have reported content that they do not like and know the next steps even, in case this situation may happen again. It's important to know what to do and how to solve any issues that may come after reporting an incident.” – Amaya, 13, interviews (online harm)

“It would help people feel more confident and acknowledged, as they would be updated so would know an outcome of the report or complaint rather than feel useless and like it was pointless because you know they won't take it up.” – Lara, 17, interviews (online harm)

Some children wanted more than just generic information once they had reported or made a complaint. Some children expressed a wish for more information about a user-to-user service's decision-making, including why they had taken action, or even why something reported was not acted upon.

“I wouldn't want them to get the wrong end of the stick, I'd want to know what they thought I don't want to see.” – Tilly, 15, interviews (lived experience of harm)

“If the platform deems it as having no claims to ban this person or something, they should get back to the person and let them know. Of course, the person who reported or made a complaint might get upset...but it will help them distinguish what is report-worthy or what is not.” – Bea, 17, interviews (lived experience of harm)

Some children had previous positive experiences where complaints and reports led to tangible action

Some of the children had previous experience reporting content or other users. Some of these had led to action being taken which children were positive about.

“So I reported this person on my computer game because they were cheating and a week later I got an update saying ‘this person has been removed’... I felt really happy.” – Trowbridge workshop, 10-11

“On Vinted, I reported someone for scamming me and they did update me saying ‘we have taken the measures needed for this person because they have violated community guidelines.’ It's just been on Vinted so far but that's good.” – Bea, 17, interviews (lived experience of harm)

Some concerns were raised about the efficacy of current reporting mechanisms

Some children had used reporting tools before and been let down because either nothing happened as a result, or no follow-up information was provided. This links to a broader theme around children's lack of trust in current systems, leading them to doubt the efficacy and practicality of this Proposal, even when they agree with them in principle.

“When a teen complains to [a user-to-user service], they don't take it seriously.” – Sabina, 17, interviews (online harm)

“If you report something [now], you don't know what happens, it just says thanks. It's not effective.” – Tilly, 15, interviews (lived experience of harm)

“The other day someone made a fake account of my friend using her pictures. We reported it, Instagram said ‘there's no problem with the account but you can block them.’ I got the update, but I would rather they removed the account.” – Cardiff workshop, 15-16

Many children did not think that Proposal B would change their online experience

While they generally agreed with the Proposal, children did not anticipate a dramatic shift in their online interactions or the content they saw. This perspective stemmed partly from their own negative experiences with current reporting and complaints tools.

Children also acknowledged that reporting and complaints tools are reactionary rather than preventative and welcomed more proactive measures to address online safety. This can be read as one of the central findings in this project; that children across the different workshops ultimately wanted Ofcom and online services to take more control of their online safety and after hearing about Proposals that were more preventative, were happy that work was being done on this³⁰.

³⁰ Please note: in Touchpoint 2 the children were introduced to all five topics but only discuss two Proposals from different Topics in detail.

When presented with Proposal C, children welcomed the idea of being able to ‘dislike’ recommended content. They were more ambivalent about being given information after taking action against content, but were open to this if the content was harmful

Trigger warning: please note there are references to violence and eating disorder content below.

Some children spoke about not being in control of what they saw online, and had experience of seeing harmful and inappropriate recommended content

As discussed in Topic 2, several children reported recommender systems pushing them content they didn’t want to see. This wasn’t always content they considered harmful. Sometimes these were “random videos” that they felt were irrelevant to them.

“TikTok is so random, anything could come up which is sometimes funny, but sometimes not.” – Belfast workshop, 14-15

“I find myself on the Instagram search page quite a lot. I get really random stuff on there.” – Ella, 17, interviews (lived experience of harm)

In some instances, the recommended content was harmful and inappropriate. For example, Daphne, an influencer aged 15, recalled seeing violent images from a murder scene of Gypsy Rose’s mother on her TikTok 'For You' page (FYP)³¹, *“even though she had not searched for this content”*. Lara, 17, who was interviewed as a participant who had experienced online harm, also reported seeing content related to body image and eating disorders on her feed. She said she had searched for them a long time ago but has since stopped interacting (e.g. liking posts) with this type of content. Lara did not expect to be seeing that content anymore, but she still was.

Children also reported being recommended content they didn't want to see. At the time of the workshops in summer 2024, riots were occurring across the UK, and some children mentioned encountering violent content related to these events, some of which they did not want to be exposed to.

“Say, if a boy is getting stabbed, I do not want to see that.” – Belfast workshop, 14-15

When presented with Proposal C many children thought providing negative feedback to recommended content was a necessary and important tool to have access to

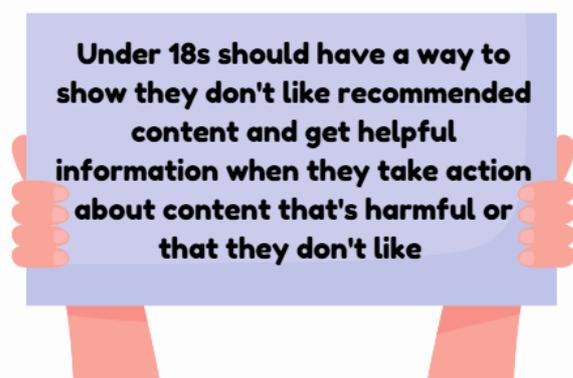


Figure 18: Description of Topic 3, Proposal C shown to children during the workshop.

Some children also highlighted that this feature does already exist on some user-to-user services and questioned how well it worked.

“I feel like this already exists though?” – Trowbridge workshop, 10-11

“On TikTok and Instagram if I start getting recommended stuff I don't like, I ignore them all or I click ‘see less of this’...On Twitter and Reddit, it's so random, you're not able to control it, the app's not as advanced, anyone can put anything on there, it won't be taken down.” - Cardiff workshop, 15-16

Some children were more positive about existing ways to provide negative feedback on recommended content, while also highlighting that they had other ways to avoid unwanted content and

³¹ Gypsy-Rose Blanchard was convicted of murdering her mother Dee Dee Blanchard who had fabricated or induced illness (FII). She was released from prison and has been popular on social media since.

shape what they were seeing online. One boy (aged 15-16) explained that if he encounters unwanted content, he simply scrolls past it. Some of the other boys agreed, considering this the easiest and quickest way to deal with unwanted content and potentially make it less likely they'd see similar content in the future.

Many children viewed the ability to provide feedback on recommended content on user-to-user services as an important function, and some spoke about using existing features like Instagram's 'See Less of This' or TikTok's 'Not Interested' button. Children reported using this option for content they didn't want to see, or repetitive content.

"I use 'see less of this', it's quite a good one. You're not necessarily blocking or something. It's just more if you don't like what you're seeing. On TikTok you get a lot of stuff that's just kind of sad so I use it for that." – Glasgow workshop, 13-14

"Sometimes I use it if I've seen something too many times." – Glasgow workshop, 13-14

Compared to options like reporting or blocking, 'See Less of This' and 'Not Interested' were seen as a less extreme way to express dislike for recommended content. For some of the children, reporting was often only necessitated by a serious violation of user-to-user service rules, while blocking was perceived as a way to prevent content or interactions from a specific user or account.

'See Less of This' was perceived to be less directly related to one thing or user, and more about allowing children to fine-tune their recommendations without resorting to more drastic measures.

When asked for their views about providing children with information whenever they 'took action' against content, children said the usefulness of this depended on whether they had taken action because of potential harm, or for another reason

When presented with the Proposals on providing children with information after blocking, muting and reporting users and content, most of the children made a distinction between blocking/muting and reporting. Blocking and muting were seen as tools to express dislike, and children spoke about using these tools when they did not want to see something, or interact with someone. Across the sample, the decision to block or mute someone was not necessarily driven by concerns about potential harm. They said it was more likely, for example, that they would take this action in order to tailor recommendations.

"Blocking you do for yourself, like if they're being annoying or spamming" –Trowbridge workshop, 10-11

As these actions were seen as 'less serious and more about signalling preference, children did not think it necessary to have additional information on further actions.

However, reporting was seen as a serious action, often driven by encountering potentially harmful content or users, and wanting to take action against it.

"Reporting is when you want the platform to ban them and it's way more serious" –Trowbridge workshop, 10-11

In this case, the children did want more information on next steps after taking action on potentially harmful content or users. In particular it seemed as though children felt that if they were taking the step of reporting content, they wanted the platform to go the effort of communicating with them afterwards.

"I think it is a good idea to know what happens after reporting someone as it gives you assurance on what punishment happens to people you report." – Glasgow workshop, 13-14

While children were open to receiving information, they highlighted the importance of concision, accessible language, and avoiding repetitive notifications. They suggested providing an option to view the information rather than being automatically shown it.

"What about an option to look at the information, because if you don't want to then fine." – Glasgow workshop, 13-14

However, some children also highlighted that they would not want to be reminded of potentially harmful content (particularly where this had caused distress or upset). They felt unprepared to confront reminders of such content without warning.

“You obviously don't like it and don't want to see it, so I wouldn't want any extra information or like a reminder³² about it.” – Glasgow workshop, 13-14

“You wouldn't want a notification, because what if you really don't want to see it, and being reminded of it traumatises you again?” – Glasgow workshop, 13-14

Case study: Amaya, 13

Amaya had previous experience of seeing self-harm content online, and had a recent experience where someone tried to befriend her via comments on a Wattpad story, who later turned out to be an adult who went on to ask her inappropriate questions over Skype's messaging function.

She was consulted on Topic 3, Proposal B, concerning user control tools and reporting. Amaya primarily used a laptop for school, and while she had an iPhone, her parents had strict screen time controls and Amaya was not allowed social media.

When presented ideas within Proposal B, she emphasised the need for clear, accessible reporting – differentiating 'reporting' as something that was serious and involved authority, from 'complaining' which expressed personal dissatisfaction with something. For Amaya, reporting should be simple, quick, and leave no room for doubt.

Amaya recalled her experience of reporting accounts on Skype and appreciated that it was a quick and easy process.

“On Skype, there have been a few incidents where random numbers would just ask me to join something. Once I've reported it there, it would tell me that like, you know, thank you for reporting the incident. The last time it happened, a few months ago, it said, 'thank you' and that they've taken it into their hands, and I don't have to worry anymore.”

While there was some information provided on Skype, Amaya felt that in general the provision of information via email might also be helpful for users. She considered emails more official and therefore, less likely to be ignored.

³² Please note: Children in the Glasgow workshop refer to 'reminders' rather than 'information' due to the use of stimulus that was updated after this workshop.

User support and provision of clear and accessible information and guidance to children

Feedback on Topic 4

Proposed measures	Proposal shown to children	
	Summary	Detailed breakdown
User support Proposal A (US5, SD2)	<p>“Resources and information should guide under 18s to support (including if they need urgent help). They should be told about the appropriate support when they might have posted/ reposted, reported or searched for harmful content”</p>	<p>“On search engines and user-to-user services, under 18s should be made aware of appropriate support anytime they report, post, repost or search for content that the law says is most harmful to children. This should also happen on user-to-user services when children report, post or repost content that involves bullying”</p>
Support resources and information Proposal B (US6, TS2)	<p>“It should be easy for under 18s to find and understand information describing how a user-to-user or search service works, the rules for using the service and what tools are available to users”</p>	<p>“On user-to-user services and search engines the terms and conditions which describe the rules around how to use the service, and what you can expect, should be easy for under 18s to find and understand”</p> <p>“User-to-user services and search engines should have resources and information that are easy for under 18s to understand and that explain the tools they can use to stay safe on a service”</p>
High-level overview for younger groups	<p>Children in the Stockport workshop, year 7, were introduced to a high-level version of components of Topic 4, particularly those that related to Proposal B. This involved:</p> <ul style="list-style-type: none"> • Introducing the children to the concept of user support online more generally • Gathering their initial reactions to the idea that it should be easy for children to find and understand information about how a website or app works • Using scenarios to gather reflections on the implications of this idea on them or other children 	

Overarching feedback on Topic 4

When presented with Proposals on Topic 4, all children were happy to have clear and accessible user support and guidance on online services. Many children felt this should already be in place. Children reflected that current information on terms of service and user support was hard to engage with.

- Overall, the children saw the provision of support resources and information as valuable, so long as they reached those who actually needed support.
- Children also felt that current terms of service could be improved and made more accessible for children.
- However, while the children viewed Ofcom's Proposals as positive, they admitted that it might not change their online experience as they rarely interacted with these resources.
- Many children felt that the Proposal around support resources and information had limitations in effectively protecting children online. As was the case when reflecting on tools to increase user control, they felt that, while important, these Proposals were reactive, and they emphasised the importance of more proactive action from "adults" (usually this was in reference to either Ofcom or the user-to-user services).

Children generally supported Proposal A. Some wanted in-the-moment support, while others had concerns about whether this support would reach the right people

Trigger warning: please note there is a reference to eating disorders below.

All children welcomed having accessible support resources online

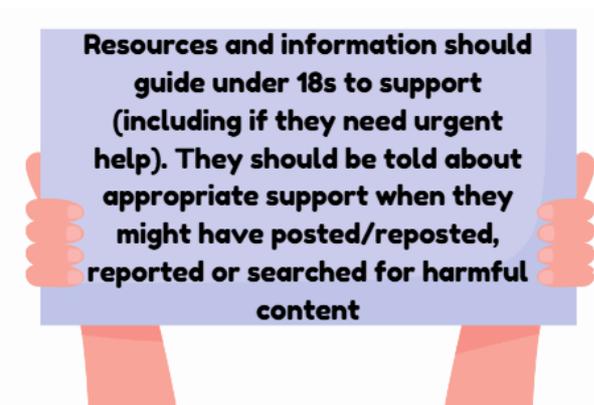


Figure 19: Description of Topic 4 Proposal A shown to children during the workshop.

All children reacted positively to the idea of having easily understandable and accessible support information. Pointing children to appropriate support in-the-moment when children engage with harmful content was especially pertinent for those who had experienced harm online.

"We were talking about support showing up when you're searching something sensitive, I think a lot of the time apps on TikTok will block the content but it should have a pop-up saying 'this is sensitive, beware' and have links to support." – Belfast workshop, 14-15

"I feel like this could help or support someone who has seen or witnessed inappropriate or harmful videos." – Belfast workshop, 14-15

Children also emphasised the importance of offering personalised support tailored to individual needs and experiences and felt that in order for signposted support to be effective and meaningful, it should not be generic.³³ They highlighted the role of user-to-user services to make sure that resources shared with children offered relevant and helpful information.

"I feel like support should be tailored to the person's need. What if they gave someone support that might not actually help them?" – Belfast workshop, 14-15

³³ While there wasn't scope to provide this detail when discussing the Proposal with children, Ofcom's draft measure US5, as detailed [here](#), proposed that children should be signposted to appropriate support, which should meet principles including relevance "to the specific kind of content in question and the way children are affected by it."

Ella, a 17-year-old who took part in the interviews, shared a personal experience where she felt timely and relevant support resources helped her, when she was hospitalised from an eating disorder: *“When I was in hospital, I was searching things on Instagram [related to diet], and a support suggestion came up saying, ‘Do you need help?’”*.

Concerns were raised about whether user support would effectively reach those who need it most

Some of the children raised questions about how services would correctly identify children in need of appropriate support, and said the priority was to make sure that those who needed support were offered and able to access it easily.

“It would be really annoying if you were being notified about support but didn’t even need it.” – Belfast workshop, 14-15

Children also highlighted the difficulty of identifying those who might need support. They used cyberbullying as an example of where the user-to-user services might not be able to pick up the nuance between harm and “banter”.

“How would you be able to tell the difference between bullying and banter?” – Belfast workshop, 14-15

Ella, 17, who had experiences of online harm reflected: *“I think you shouldn’t only be offered support once you’ve searched in bad things because sometimes that’s a bit too late... maybe helplines should be on your search page all the time, they could see it before they’re in a real crisis.”*

Overall, the children supported having user support information and simpler terms of service set out in Proposal B and felt there was work to be done to make them more engaging for children

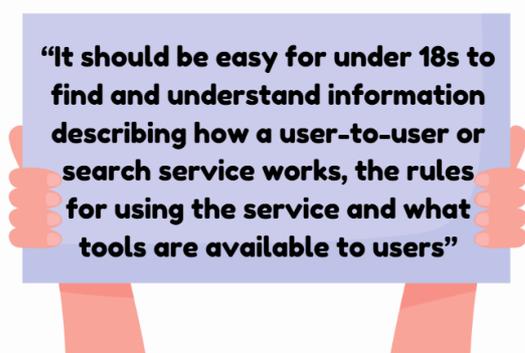


Figure 20: Description of Topic 4 Proposal B shown to children during the workshop.

Children felt that terms of service were hard to engage with; children who had seen support resources felt this was also true of this information as well. They reacted positively to having simple, easy to understand information

Providing easily accessible and understandable information on available resources and the terms of service were seen as important for ensuring children could make informed choices.

The same was said of user support information. Children struggled to identify support materials offered by services but similarly felt that these should be simple and accessible. While children found the idea of having support information available, they felt that current

support information was hard to access, and sometimes, difficult to read through.

“Social media is serious so you should be able to read it easily. They should make it more concise and have it in bullets.” – Daphne, 15, interviews (influencer)

For some of the children, having accessible user support information was crucial in allowing children to make informed choices, and would make people feel safer.

“Knowing all the information is easy and accessible will ease people’s minds.” – Stockport workshop, 11-12

However, most children reported often scrolling past the terms of service, accepting them without reading them.

“I’m quite lazy, I like to go the easy way through things, terms and conditions I’m like: [sigh] really?” – Daphne, 15, interviews (influencer)

“I don’t read it. If you don’t accept it, you can’t really use the app. So, you kind of just have to accept it then.” – Belfast workshop 14-15

Some of the children reflected that by the time a potential user reaches the terms of service, they are already invested in accessing the online service. At this point, the terms of service are perceived as an obstacle, and users simply accept them to gain access. The fear of missing out on being on a service where a user's friends are, or missing out on a new and exciting experience, seemed to override any inclination to carefully consider the terms.

This highlights a tension: accept the terms, regardless of comprehension or agreement, or be denied access to a social space.

There were a few exceptions. When signing up to some social media services, Daphne, a skincare influencer aged 15, said she read the terms of service because, as she explained, *"Mum has drilled it into my head that it is important to be aware of what I'm signing up to."*

From her perspective, Daphne wanted more information and guidance on navigating user-to-user services as a child influencer. Specifically, she wanted to understand how to manage sponsorships: *"I'd like a bit more on managing money, because it's just kind of 'off you go.' Many people and brands reach out to you to manage your content, but you don't know if it's trustworthy or not."*

Many admitted they rarely read current information about online services, and felt that the format had to change in order to engage children³⁴

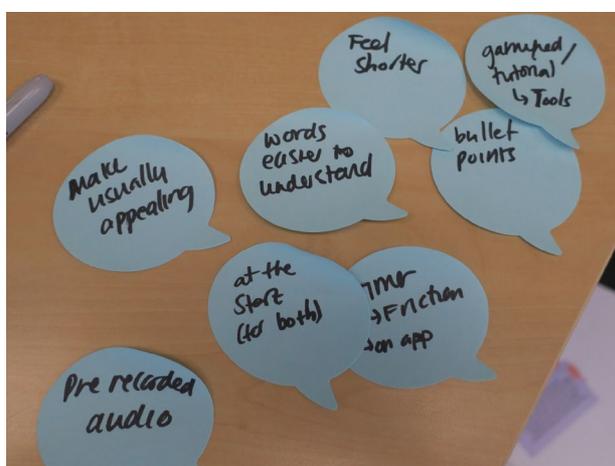


Figure 21: Children's suggestions of how terms of service could be made more engaging for children.

Most children felt that current terms of service and user support information were too long and complicated to engage with. Instead of lengthy text and complex language, most children proposed more engaging formats such as short bullet points, animated videos, and interactive elements.

"[Currently] it's just too long. Just shorten it down into bullet points, lots of them are massive. A lot of it is very confusing words." – Belfast workshop, 14-15

Most of the children suggested that both terms of service and user information should be shortened and made more engaging. Many children suggested that user-to-user services need to find more engaging and effective ways to communicate information to ensure children understand the rules and expectations of online services.

In addition to simpler and more concise language, some children suggested adding more friction to terms of service, so they are not able to easily skip through. A couple of children suggested having a timer requiring users to stay on the page for a minimum duration.

"If they had a timer on it where you had to read it for like 20 seconds to skim over it." – Belfast workshop, 14-15

However, despite these changes, most children said it was unlikely they would opt to read the revised and simpler terms of service.

"I feel even with these changes that many people are still going to ignore these and continue not reading through them." – Daphne, 15, interviews (influencer)

³⁴ Post-it notes read from left to right: make visually appealing; words easier to understand; feel shorter; bullet points; gamified/ tutorial tools; pre-recorded audio; at the start (or both); friction on app.

Case study: Daphne, 15

Daphne, a skincare influencer, was consulted on Topic 4 Proposal B and gave feedback on this from the perspective of a content creator, as well as a 'user' of social media.

Daphne emphasised that the importance of reading terms of service depended on the context. While she might skim them for less critical situations, she understood the seriousness of terms of service on social media and made an effort to read them in that context. She credited her mother for instilling the importance of understanding what she was signing up for. However, in practice, Daphne also admitted that she skipped through the terms and conditions when signing up for an account on different user-to-user services.

She expected terms of service to outline rules, regulations, app usage guidelines, and relevant laws. She believed it would be helpful for content creators like herself to have specific guidance on appropriate content, including examples of words and tags to avoid. She was conscious of not providing a negative experience for her audience and wanted to ensure her content aligned with service guidelines.

Daphne suggested that current terms of service could be more tailored to influencers, providing key information and resources relevant to their activities. She highlighted the lack of guidance on managing sponsorships and finances, noting that young influencers were often left to navigate these aspects independently. She also expressed concern about the trustworthiness of individuals who offered to manage content for influencers.

To improve current terms of service, she recommended:

- Clear and accessible language
- Concise formatting
- Prominent presentation
- Influencer-specific guidance if relevant

However, despite implementing these changes, Daphne was sceptical people would engage with terms of service as people generally did not prioritise reading them.

Governance and internal systems

Feedback on Topic 5



Figure 22: Description of Topic 5 shown to children at the beginning of the workshop and in the survey post-workshop.

Topic 5 included Proposals which focused on internal user-to-user service systems rather than user-facing Proposals. The children did not explore this Topic in detail during workshops and interviews.

The children received a general overview of all five Topics at the beginning of the workshops and interviews, and again during a light-touch open response survey post-workshop where final reflections were gathered. At the start of the workshops/interviews, in Touchpoint 1 and 3, Topic 5 was briefly described as "services should have to come up with new ways to keep children safe."

Summary of feedback on Topic 5 in Touchpoint 3

Most children thought that services having teams in place to ensure children's safety while using the service was a good idea

The children emphasised the importance of a collaborative effort between Ofcom and user-to-user services to improve online safety. They believed that this collaboration, combined with the implementation of the Proposal, could help establish new social norms for children online, fostering a safer and more positive online experience.

"This seems like an appropriate solution to online safety and may lead to even more policies that are useful to young people." – Bea, 17, interviews (lived experience of harm) (Touchpoint 3)

"These ideas make me feel safer because someone else is taking responsibility, knowing that there are companies out there who have to look after us, adults should take more responsibility." – Maidenhead workshop, 12-13 (Touchpoint 3)

"The Internet can be a harmful place for everyone so it's a good idea to put a stop to dangerous stuff." – Sasha, 15, interviews (living in care) (Touchpoint 3)

"It is important that people are checking sites constantly to make sure they are suitable for children." – Cardiff workshop, 15-16 (Touchpoint 3)

"Because it's their [the company's] own game, they need to be the ones to change anything that is wrong or upsetting for others so everyone can play." – Twickenham workshop, 9-10 (Touchpoint 3)

"I think they will genuinely make the online world a safer place; these online companies are not being pushed enough to make a difference and they don't care enough about their user's safety." – Belfast workshop, 14-15 (Touchpoint 3)

"I think it's good because they're protecting us when our parents and teachers can't, there's a whole group of people working together to stop the internet making children sad." – Twickenham workshop, 9-10 (Touchpoint 3)

There were some doubts around how cooperative online services would be

While children thought Topic 5 was a good idea, some were worried that online services might find loopholes or do the minimum of what was required.

"People can sometimes easily find loopholes or ways to not abide by the rules so it's good to make sure that all websites are supporting this idea to keep children safe online." – Amaya, 13, interviews (online harm) (Touchpoint 3)

“Not everybody wants the best for the children so they might not want to be educated and talk about how to protect children online.” – Nina, 17, interviews (online harm) (Touchpoint 3)

“People find their way around things.” – Trowbridge workshop, 10-11 (Touchpoint 3)

“I feel as though the ideas are a bit unrealistic though because social media is so big I feel it would be quite hard to control and moderate the things that are on there.” – Sophie, 17, interviews (living in care) (Touchpoint 3)

“I don’t feel like enough is being done to enforce the rules.” – Nottingham workshop, 16-17 (Touchpoint 3)

“I think it’s a really positive start but hope all of the tech companies take it seriously. Too often companies get around things or just offer the lowest form of security or verification and make out that they care about harmful content and the impact it has. The main focus must be on keeping people safe not the money that’s being made.” – Cardiff workshop, 15-16 (Touchpoint 3)

“It’s just hard to say if there will be an impact as the web is so large and there are so many ways around it and types of users.” – Belfast workshop, 14-15 (Touchpoint 3)

Glossary

Age assurance – A broad term encompassing various methods to establish a user's age with a degree of certainty.

Age estimation – A form of age assurance designed to estimate the age or age-range of the user.

Age verification - subset of age assurance that specifically refers to confirming a user's age with a high level of confidence, such as confirming age by checking against trusted government-issued identification.

Block – A user-to-user functionality where a) blocked users cannot send direct messages to the blocking user and vice versa; b) the blocking user will not encounter any content posted by blocked users on the service and vice versa; c) the blocking user and blocked user, if they were connected, will no longer be connected.

Codes of practice – The set of measures recommended by Ofcom for compliance with the children's safety duties.

Comments – User-generated responses to content posted on online services.

Complaining – Formal expressions of dissatisfaction or concern about content or behaviour on an online service.

Content moderation – When a service reviews content to decide whether it is permitted on its platform.

Deliberative approach – A methodology that involves providing children with information about a Topic and allowing time for reflection and discussion, enabling them to develop informed viewpoints on complex or unfamiliar issues.

Downranking – Action taken by online services which involves altering the ranking algorithm, so pieces of content appear lower in the search results and are therefore less discoverable to users.

Group chats - User-to-user service functionality allowing users to send and receive messages through a closed channel of communication to more than one recipient at a time.

Measures – Specific actions or recommendations proposed by Ofcom to help online services comply with their duties under the Online Safety Act, particularly in relation to protecting children from harmful content.

Mute – A user tool to control interactions. The muting user will not encounter any content posted by muted users on the service (unless the muting user visits the user profile of the muted user directly).

Non-designated content (NDC) – A category of content harmful to children defined in the Online Safety Act, broadly: content, which is not primary priority content or priority content, of a kind which presents a material risk of significant harm to an appreciable number of children in the United Kingdom.

Online service - Any service accessed over the internet, including services that connect users with each other and those that help users find information

Predictive search – Search service functionality that anticipates a search query based on a variety of factors.

Primary Content (PC) – A category of content that is harmful to children, as defined in section 62 of the Online Safety Act: abuse and hate content, bullying content, violent content, harmful substances content, dangerous stunts and challenges content.

Primary priority content (PPC) – A category of online content considered extremely harmful to children, as defined in section 61 of the Online Safety Act, including pornography, and content promoting suicide, self-harm, or eating disorders,

Proposal – Groupings of measures presented to children participating in this project.

Rage Baiting – The practice of intentionally posting provocative content to generate negative comments and reactions, often done to increase engagement and visibility of content.

Recommender Systems - An algorithmic system which, by means of a machine learning model, determines the relative ranking of suggestions made to users on a user-to-user service. The overarching objective of

recommender systems is to ensure that users receive suggestions they are likely to find relevant and engaging. This can include suggesting connections, groups, events and content.

Reporting – User reports are a specific type of complaint about content, submitted through a reporting tool.

Safe search – A feature of several general search services which filters certain kinds of search content.

Screen time – The amount of time a user spends using their devices.

Search service– An internet service that is, or includes, a search engine.

Self-declaration – A process where the user is asked to provide their own age. This could be in the form of providing a date of birth to gain entry to a service or by ticking a box to confirm a user is over a minimum age threshold.

Spam – Unwanted messages or content, often sent repeatedly.

Terms of service – all documents comprising the contract for use of the service (or part of it).

User tools – Features and functionalities provided by online services that allow users to control their online experience, including blocking, muting, reporting, and content filtering options.

User-to-user service – An internet service where users of the service can generate, upload and/or share content, which can then be seen by other users of the service.

Video-on-demand – Internet services that allow users to select and watch video content at their chosen time, rather than according to a broadcast schedule.

Annex

Method breakdown

This project employed a mixed-methods approach to gather children's perspectives on Ofcom's draft Children's Safety Codes. The project involved three key Touchpoints:

Touchpoint 1: Building Context

Objective: To establish a baseline understanding of children's views on online safety and prepare them for deeper engagement with Ofcom's Proposals.

- A short survey assessing children's unprompted understanding of online safety, including who is responsible for protecting children online.
- A 5-minute animated video introducing Ofcom, the Online Safety Act, Ofcom's Proposals, and the workshop/interview process.
- An "endline" exercise with similar questions to the initial survey, and video selfie submissions reflecting on the video and potential impacts of Ofcom's Proposals.

Touchpoint 2: Workshops and Interviews

Objective: To engage children in in-depth discussions on Ofcom's draft Children's Safety Codes and capture their opinions and insights.

Workshops:

- Facilitated discussions on two out of four Topics (one group focused solely on Topic 3 due to its larger scope).
- Younger children (years 4-6) covered a simplified version of Topics 1, 2, and 3.
- Topics 1-4 were discussed in-depth across workshops and interviews.
- Topic 5, focusing on internal user-to-user systems, was not covered in depth.
- Activities included written responses, contextual discussions, in-depth reflections, and scenario-based exercises.

Interviews:

- One-to-one interviews (in-person or remote) and mini-groups for children with specific experiences and characteristics of interest.
- Adapted questions and discussions to suit individual comfort levels and communication styles.

In both the workshops and interviews, children completed a range of activities. Facilitators recapped learnings from Touchpoint 1 and completed an icebreaker with the children, asking them to write a post-it with one thing they would change about their experience online.

If they were over the age of 11, the children were introduced to the harms Ofcom were trying to reduce and provided with an overview of the five Topics.

When initially introduced to a Proposal within a Topic, children were asked to complete a private response form ranking how good they thought this Proposal was for children online.

Please put an X on the spectrum below to tell us **how much you think this is a good idea for children online.**

Please explain your thinking - Why did you put the X there?

Figure 23: Private response form given to children during the workshop.

Using stimulus, proposals were then discussed in more detail. Children discussed their initial reactions, pros and cons, and, using stimulus of different personas, also considered how these Proposals might affect other children who have experienced harm.

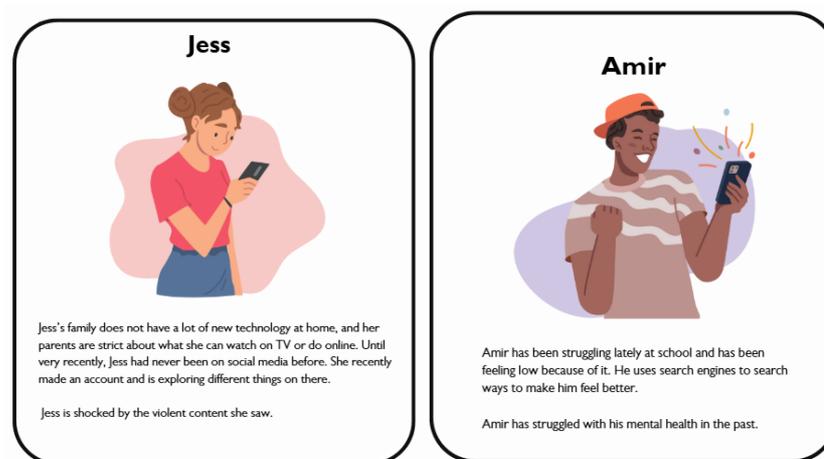


Figure 24: An example of two personas shown to children during the workshop.

At the end of the discussion, children were asked to reflect on their initial private responses and see if their answers had changed following the discussion.

This was then repeated for the other Proposals covered.

Touchpoint 3: Final Reflections

Objective: To gather final thoughts and feedback on the project process.

- A short, open-response survey for final thoughts and feedback.
- Revealing Reality will contact the children to share project outcomes, highlighting what's happened as a result of their participation and Ofcom's consultation.

Quota breakdown for children with experiences or characteristics of interest

Quota	Detail	Number
Demographics		
Gender	Male	7
	Female	13
Age	13	3
	14	2
	15	4
	16	4
	17	7
SEG	AB	3
	C1/C2	9
	D/E	8
Location	Scotland	1
	Wales	3
	Northern Ireland	2
	Northwest England	5
	Northeast England	1
	Midlands England	1
	Southwest England	0
	Southeast England	2
	London, England	2
Area type	Urban	11
	Suburban	4
	Rural	5
Ethnicity	BAME	8
Specific characteristics or experiences		
Children who have reported experiencing content harmful to children online . This could include self-harm, suicide, pornography, bullying, eating disorders, hateful and violent content.		12
Children who have lived experience of harm . This included children who had experience of self-harm, eating disorders and suicidal ideation or		3

attempts. In order to participate, the children had to have been in recovery for a minimum of 6 months and needed to have support in place.	
Children with special educational needs or a disability .	5
Children who are living in care or with a guardian who is not a parent .	10
Children who are young content creators/ influencers . To fall in this category, they had to have had a public social media account, must have over 5,000 followers and must be posting content with a commercial aim (e.g. to get sponsored, to attract brands, to gain more viewers etc)	2

Detailed breakdown of the Topics and Proposals discussed

Topic I Access to online services and sites - proposed measures controlling or restricting children's ability to access certain online services, or content harmful to children.

Grouping	Related measure	Child friendly summary of the grouping	Child friendly detailed breakdown
Proposal A	<p>Social media</p> <p>Use highly effective age assurance to prevent children from accessing the entire service (AA1, AA2)</p>	Under 18s should not be able to access user-to-user services if most of the content is harmful to children	User-to-user services should stop under 18s from going on the service if its main purpose is to show types of content that the law says is harmful to children. This can be done by asking users to prove they are over 18.
Proposal B	<p>Social media</p> <p>Use highly effective age assurance to ensure children are prevented from encountering Primary Priority Content and Priority Content identified on the service (AA3, AA4)</p>	User-to-user services that show any content the law says is harmful to children, should not let under 18s see this content but should let them see other content.	User-to-user services should stop under 18s from seeing types of content the law says is harmful to children, even if they can see other content. This can be done by asking users to prove they are over 18.

Topic 2 Online services should prevent children from seeing harmful content – proposed measures aimed at reducing the prominence, automatic recommendation or exposure of content harmful to children

Grouping	Related measures	Child friendly overview of the groupings	Detailed breakdown – child friendly
<p>Proposal A</p>	<p>Social media</p> <p>Use highly effective age assurance to apply relevant recommender system measures in the code to children (AA5, AA6)</p> <p>Ensure that content likely to be PC is reduced in prominence on children’s recommender feeds (RS2)</p> <p>Ensure that content likely to be primary priority content is not recommended to children (RS1)</p>	<p>User-to-user services should use content moderation and / or recommendations to help stop under 18s seeing content the law says is harmful to children</p>	<p>User-to-user services should not recommend content (e.g. on a ‘For You Page’ or ‘Suggested Posts’) to under 18s that could be harmful to children under the law. Depending on how harmful the content is, it should either not be recommended at all to under 18s, or it should be lower down in their feed.</p>
	<p>Social media</p> <p>Content moderation systems and processes designed to swiftly take action against content harmful to children (CMI)</p>		<p>User-to-user services should use content moderation so that under 18s can’t see content the law says is harmful to children. They should take action quickly e.g. removing it for under 18s, when they know there’s content that is harmful to children.</p>
<p>Proposal B</p>	<p>Search</p> <p>Have moderation systems and processes in place to take appropriate action on Primary Priority Content, Priority Content and Non-Designated Content A) When Primary Priority Content has been identified, downrank and/or blur the search content B) When Priority Content and Non-Designated Content has been identified, consider if it is appropriate to downrank and/or blur the search content (SMI)</p>	<p>Search engines should remove, blur or push content down search results to help stop under 18s seeing content that’s harmful to children.</p>	<p>Search engines should take action against content the law says is harmful to children. They should blur and/or push the most harmful content down in search results and should consider doing this for other content the law says is harmful to children as well.</p>
	<p>Search</p> <p>When a user is believed to be a child, filter identified</p>		<p>If they think a user is under 18, search engines should make sure the user has a</p>

	Primary Priority Content out of their search results through a safe search setting. Users believed to be a child should not be able to turn this setting off (SM2)		safe search setting turned on which removes content that the law says is the most harmful to children. Under 18s should not be able to turn this setting off.
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Topic 3 tools to give users control over interactions – proposed measures giving children control over their response to harmful content and their interactions with other users

Grouping	Related measures	Child friendly overview of the grouping	Detailed breakdown – child friendly language
Proposal A	Social media Provide children with an option to accept or decline an invite to a group chat (US1)	Under 18s should have tools to use on user-to-user services like declining invites to group chats, blocking, muting, and disabling comments	Under 18s should have an option to accept or decline an invite to a group chat on user-to-user services
	Social media Provide children with the option to block and mute other users' accounts (US2)		Under 18s should have an option to block and mute other users' accounts on user-to-user services
	Social media Provide children with the option to disable comments on their own posts (US3)		Under 18s should have the option to turn off comments on their posts on user-to-user services.
Proposal B	<p>Social media</p> <p>Have complaints processes which enable users to make relevant complaints for services likely to be accessed by children (UR1)</p> <p>Have easy to access and use, and transparent complaints systems (UR2)</p> <p>Acknowledge receipt of complaints with indicative timeframe and information on resolution (UR3)</p> <p>Search</p> <p>Offer users a means to easily report predictive search suggestions that might increase the risk of user exposure to Primary Priority Content and Priority Content and take appropriate steps to ensure that suggestions are</p>	Under 18s should be able to easily report and complain to user-to-user services and search services about content or other users. They should be told about the next steps after complaining.	<p>It should be easy and clear for under 18s to make complaints to user-to-user services or search providers. The service should give the user information about what happens after they've made a complaint and provide updates</p> <p>It should be easy for all users of a search engine to report a search term that has been suggested to them using predictive text. If a reported search term might show under 18s content that the law says is harmful to children, it should not be suggested to users again.</p>

	not recommended to any user where a clear risk is identified. (SD1)		
Proposal C	<p>Social media</p> <p>Enable children to provide negative feedback on content that is recommended to them (RS3)</p> <p>The provision of information to child users when they restrict interactions with other accounts or content (US4)</p>	Under 18s should have a way to show they don't like recommended content and get helpful information when they take action about content that's harmful or they don't like	<p>User-to-user services should give under 18s a way to say if they don't like content that's been recommended to them (e.g. 'see less of this').</p> <p>When under 18s on user-to-user services report, block, mute or say they want to 'see less' of or 'hide' an account or a type of content, they should be given information about what they've just done and about further action they could take to increase their safety.</p>

Topic 4 User support – provision of clear and accessible info / guidance to children – proposed measures ensuring children can access clear and accessible information and guidance about a service

Grouping	Related measures	Child friendly overview of the grouping	Detailed breakdown – child friendly language
Proposal A	<p>Social media</p> <p>Signpost children to support at key points in the user journey (US5)</p> <p>Search</p> <p>Provide crisis prevention information in response to known Primary Priority Content-search requests regarding suicide, self-harm and eating disorders (SD2)</p>	Resources and information should guide under 18s to support (including if they need urgent help). They should be told about this support when they might have posted/reposted, reported or searched for harmful content	<p>On search engines and user-to-user services, under 18s should be made aware of appropriate support anytime they report, post, repost or search for content that the law says is most harmful to children.</p> <p>This should also happen on user-to-user services when children report, post or repost content that involves bullying</p>
Proposal B	<p>Social media</p> <p>Terms and statements regarding the protection of children should be clear and accessible (TS2)</p> <p>Search</p>	It should be easy for under 18s to find and understand information describing how a user-to-user or search service works, the rules for	On user-to-user services and search engines the terms and conditions which describe the rules around how to use the service and what you can expect, should

	<p>Terms and statements regarding the protection of children should be clear and accessible (TS2)</p>	<p>using the service and what tools are available to users.</p>	<p>be easy for under 18s to find and understand.</p>
	<p>Social media Provide age-appropriate user support materials for children (US6)</p> <p>Search Provide age-appropriate user support materials for children (US6)</p>		<p>User-to-user services and search engines should have resources and information that are easy for under 18s to understand and that explain the tools they can use to stay safe on a service.</p>