



**Children's  
COMMISSIONER**

# Introduction from the Children's Commissioner



When I stepped into my new role as Children's Commissioner on 1st March 2021, I already knew there was a serious issue around sexual harassment and abuse in schools. Over 30 years as an educator, working directly with children in schools across the country, had shown me this plainly.

However, I don't think any of us – parents, teachers, policymakers – had fully grasped the scale of the crisis. When Everyone's Invited exploded after the horrific rape and murder of Sarah Everard, we were overwhelmed by the tens of thousands of testimonies detailing harassment, intimidation and sexual violence in schools and colleges. Each story is written by an individual. They show that these issues are not bound by geography or

socioeconomics. Peer-on-peer abuse is universal, and to a large extent normalised and brushed under the carpet.

For me, the most troubling revelation is the lack of trust that many victims say they feel in safeguarding processes. Clearly schools and colleges – and by extent Ofsted and the Department for Education – have a significant role to play here in sharpening up these processes and restoring victims' faith in safeguarding. I sat on the 2021 Ofsted Review into sexual harassment in schools and recommended just this.

However, this is not simply a "school" or "college" issue, it is a societal one. Children can be exposed to street harassment by adults, not just in school from their peers. Moreover, harmful sexual behaviours are increasingly being shaped by the content and cultures that children are exposed to online, including pornography, misogynistic trolling and the non-consensual sharing of intimate images. It is important to remember that child perpetrators are also victims in this regard.

Tackling online sexual abuse and harassment among young people quickly became a key priority for me and my Office. I was delighted to be asked by the Secretary of State for Digital, Culture, Media and Sport and the Secretary of State for Education to look at the issue of internet pornography and other inappropriate and harmful content online, and how this is fuelling the sexual violence crisis we are seeing in schools. I was asked to look at what more can be done *now*, ahead of the Online Safety Bill reaching assent and implementation, to protect young people online.

I was glad that the Secretaries of State also asked for my assistance in bringing children's voices to the heart of the debate around the Online Safety Bill. Children are born into a world of 24-hour digital connection. It is a world which, far too often, does not have their best interests and safety at heart. It is crucial that we listen to children as this landmark Bill passes through Parliament.

This document is a summary of 9 months of work on these issues. My team have consulted with children, young adults and parents, and with regulators in this country and around the world. I have also convened roundtables of the adult and social networking industries, alongside both Secretaries of State.

Children told us that adults need to step up to the plate. It is no longer acceptable for them to say that they "don't understand" what's going on in their digital lives. I used young people's voices and insights to produce our fantastic guide for parents on sexual harassment and abuse: ["The things I wish my parents had known"](#).

Up until now, we have been several steps behind when it comes to making the online world a safe place to grow up. Yet I believe that there is cause for optimism. The Online Safety Bill can be a landmark piece of legislation which will reset the contract between tech firms and their youngest users. Furthermore, there are several areas where the Government and tech industry, as well as teachers and parents, can make more immediate change. I outline these in the final recommendation section of this report.

Now I have identified the issues I will continue to champion this cause. I am excited to work with Government and the tech industry, and with children and parents to create a safer internet for all users. I truly believe that with good collaboration, this can be a reality, and soon.

## My thanks

I would like to express my heartfelt thanks to the many children and young people with whom we consulted over the course of this work. Thank you for your honesty and bravery in talking about these difficult issues. Across focus groups, workshops and in response to The Big Ask you told us clearly why this is an issue and *how* things need to change. We could not have completed this work without you.

I would also like to thank the Department for Digital, Culture, Media and Sport and the Department for Education for their trust in commissioning this important programme of work, and for their continued support with it.

Finally, I would like to thank the members of my expert charity steering group – Action for Children, Barnardo's, Childnet, Internet Matters, IWF, NSPCC, ParentZone and the PSHE Association – who offered great advice and insight for my parents' guide to online harassment. Their fantastic research and resources influenced this "final findings" report too.

**Dame Rachel de Souza** DBE  
Children's Commissioner for England

## Contents

<b>Section 1</b>	
Background.....	04
<b>Section 2</b>	
Findings.....	08
<b>Section 3</b>	
The Commissioner's recommendations...	14
<b>Section 4</b>	
Next steps.....	22

# Section 1: Background

## Executive summary

- > This work has shown that all children are affected by the online world in profound ways. These effects can be both good and bad.
- > Predominantly, children told us that they want more protection online. They think that young children should be kept off social networking platforms when they are below the minimum sign-up age (which, for most platforms, is 13 or 16 but many children get their first account at age 8 or 9). Children also want platforms to be designed with their safety and best interests in mind.
- > We have provided recommendations for the Online Safety Bill which directly reflect our conversations with children. We also discuss ways that children can be looked after online in the meantime, ahead of the Online Safety Bill taking effect.
- > We feel that underage use of social media and messaging platforms is widespread and normalised, and this can be very dangerous. There is also a serious issue around kind of content that children are exposed to on these platforms, which is not adequately addressed by platforms reporting and content moderation policies. We will be requesting greater clarity from tech firms on these issues, and we will supplement the information they provide with more quantitative and qualitative work with children and parents.
- > We have also uncovered serious issues around children's exposure to pornography and the effect that this has on serious cases of peer-on-peer sexual violence. We will continue work on this issue by working with Sexual Abuse Referral Clinics (SARCs) and talking to young people who have been referred for experiences of peer-on-peer abuse.

**"I think that we all spend so much time on social media, worrying about how many followers we have, that we don't get enough time to just stop and do nothing, or go outside or spend more time with our families."**

Girl, 12.

## Introduction

In June 2020 Soma Sara founded the [Everyone's Invited](#) movement, an anonymous forum for survivors of sexual harassment and abuse focussed on exposing the prevalence of sexual violence in schools. Almost one year on, in the period of shock and mourning following the murder of Sarah Everard, the site received tens of thousands of posts – each detailing an individual's experience of sexual harassment and abuse by peers. To date over 50,000 testimonies have been posted to the site, mostly by girls and young women, chronicling a widespread normalisation of peer-on-peer abuse in schools and colleges, in public and private places, both offline and online.

A stark revelation, underlying a large proportion of the Everyone's Invited testimonies, is the lack of faith that many girls feel in safeguarding processes. Offences often go unreported because victims fear being blamed or ostracised, or fear dismissal of their cases as "banter", and "boys being boys". Indeed, when reports are made, a troubling number appear to go unchallenged and are not taken seriously by adults.

Many hailed the Everyone's Invited moment as a watershed moment and 'wake-up-call' to the education sector, and rightly so.

In April 2021 the Children's Commissioner launched The Big Ask, a national consultation of England's children which grew into the largest-ever survey of children with over half a million responses. Qualitative analysis of responses showed that sexual harassment is a significant issue for girls, affecting their confidence and happiness. Experiences of assault and rape have profound effects on mental health. Responses also indicated that children themselves worry about the impact of pornography but feel pressure to view it.

The Children's Commissioner sat on the reference group for the Ofsted Review of sexual abuse in schools and colleges.<sup>1</sup> On this she recommended better support for victims, along with greater oversight and clarity from Ofsted and the Department for Education on how settings should respond to cases of peer-on-peer abuse.

Yet, it is clear that schools and colleges cannot tackle sexual harassment in isolation. Inappropriate and explicit content children are exposed to online, often from very young ages, is shaping unrealistic expectations of sexual relationships and normalising harmful behaviour.<sup>2</sup> Likewise, much peer-on-peer abuse is perpetrated via online platforms, particularly on social media and messaging apps, on which teachers have limited oversight.

Alongside the Ofsted Review, the Commissioner was clear that the Government needed to develop a strategy to challenge peer-on-peer abuse as it manifests online, where teachers and parents often feel ill-equipped to confront these issues.

As the Ofsted Review reached its conclusion in May 2021, the Commissioner was delighted to be asked jointly by the Secretary of State for Digital, Culture, Media and Sport and Secretary of State for Education to explore issues around peer-on-peer abuse online and to report back with her findings. This document outlines the research, our key findings and the Commissioner's final recommendations to Government.



# Our work

As outlined in our [Interim findings report](#), over the course of the first phase of work (June-September 2021):

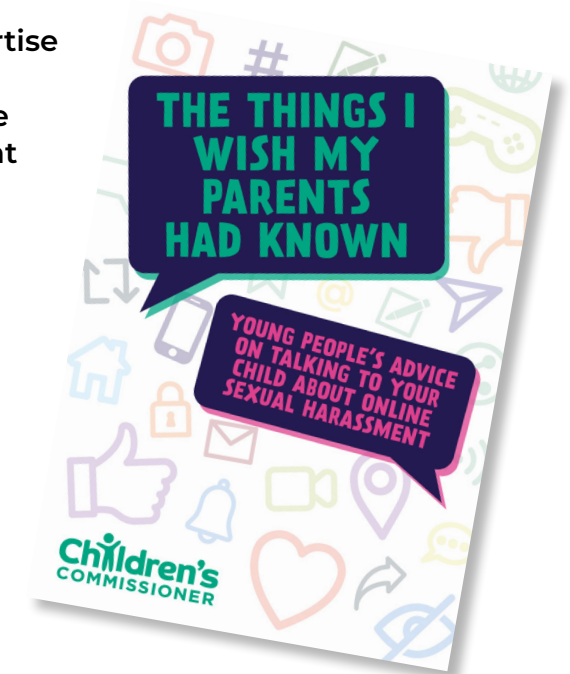
- > We analysed responses to The Big Ask, the largest-ever survey of children, and collated responses relating to common themes of sex, relationships, and online lives. Responses indicated that sexual harassment is a significant issue for girls, particularly teenagers, affecting their confidence and wellbeing. Children expressed concern about the effects of viewing pornography and participating in harmful behaviour, but felt pressured to do so.
- > We conducted a rapid review of the existing evidence on Online Sexual Abuse (OSA) and Online Sexual Harassment (OSH), the findings of which have informed this work.
- > The Commissioner chaired a roundtable of adult platforms, also attended by the Children and Families Minister and the Home Office Safeguarding Minister, to understand the barriers to implementing effective age verification (AV) on sites hosting pornography *ahead* of the Online Safety Bill.



- > The Commissioner also chaired a roundtable of the eight largest social media and messaging platforms.<sup>3</sup> This was on the subject of age assurance and protections of under-18s on these services, again with a focus on opportunities for progress on child safety *ahead* of the Online Safety Bill.
- > The Commissioner was a member the reference group to the Ofsted Review of sexual abuse in schools and colleges, on which she recommended better support for victims in schools and for greater oversight from Ofsted and the Department for Education.<sup>4</sup>
- > The Commissioner was appointed to the Prime Minister's G7 Advisory Council on Gender Equality, contributing her findings on online sexual harassment to the 'Building Back Better for Women and Girls' report.<sup>5</sup>

Over the course of the second phase of the project, since the publication of our interim findings (October 2021 – March 2022):

- > The Commissioner chaired a follow-up roundtable of the social media and messaging platforms, with a continued focus on age assurance and enhanced protections for under-18 users of these services. This roundtable was co-chaired by the Secretary of State for Digital, Culture, Media and Sport, the Secretary of State for Education, and the Minister for Children and Families.
- > At the follow-up roundtable with tech firms, the Commissioner secured a pledge from all platforms in attendance to share with the Commissioner data on the prevalence of underage users (i.e. those below the minimum sign-up age) and 'legitimate' under-18 users (i.e. children above the minimum sign-up age), as well as the nature and scale of harms that these children may be exposed to on each platform. Tech firms agreed to meet with the Commissioner on a regular basis to discuss improvements in these areas.
- > We organised a series of focus groups with children and young people aged 12–21 at school, college, and university to gain insights and advice on tackling sexual harassment and abuse online.
- > We spoke to parents of children at primary and secondary schools to understand their level of concern and knowledge on issues around sexual harassment and peer-on-peer abuse – and in particular how these can occur online.
- > The Commissioner convened an expert steering group of civil society leaders with specific expertise in the field of online child protection, whose insights and advice we used to inform our guide for parents on tackling online sexual harassment and abuse.
- > The Children's Commissioner's office, in partnership with the Children and Families Minister, held a workshop with young people aged 16–21 on the subject of online sexual harassment, asking for advice for parents on dealing with these issues. We used insights from this workshop to inform our guide, "The things I wish my parents had known", on how parents should confront online peer abuse.<sup>6</sup>
- > We consulted with Internet service providers (ISPs) to understand technical hindrances to blocking non-compliant adult sites, such as DNS-over-HTTPS (DoH) protocols which prevent ISPs from blocking offending services.
- > The Commissioner and her team also spoke to regulators in the UK, Germany, and Australia to understand possibilities for technical and legislative measures to prevent children from accessing inappropriate and harmful material, including pornography.



## Section 2: Findings

### 1. Our findings from children and young people

We spoke to a wide range of teenagers and young adults in schools, colleges, and universities to understand the factors fuelling sexual violence in schools, with a particular focus on inappropriate content, including pornography. These interviews and focus groups also provided insight into the prevalence and dynamics of online peer-on-peer sexual harassment and abuse. Children and young people told us that:

> **They feel that there are high levels of harmful attitudes and behaviours amongst young people, and these behaviours are being shaped by exposure to inappropriate content and culture online. This content at best, depicts unrealistic bodies and sexual activities, and at worst normalises sexual violence and rape. This includes pornography, but also other harmful content and culture such as:**

- Hyper-sexualised material on social media platforms, often directly promoted by recommendation algorithms.<sup>7</sup>
- Extreme dieting content and material promoting body dysmorphia and eating disorders (e.g. “pro-ana” content) which, despite clampdowns in recent years, is still prevalent on mainstream social media platforms<sup>8</sup> and accessible via search engines.<sup>9</sup>
- Heavily-edited and filtered images which children and young people tell us are normalised. Children told us they wouldn’t consider posting a photo to social media without first editing and/or applying filters. This can contribute to negative self-perception and body dysmorphia.<sup>10</sup>
- Exposure to trolling and misogynistic cultures which promote sexual violence on social media, messaging, and gaming platforms and on other online forums.

**“I think its quite different now from when [my parents] were growing up, social media, they didn't have to worry about that, its a different time period.”**

Child with a social worker.

> Sexual harassment and abuse is perpetrated on online platforms. Although many of the behaviours and attitudes driving the harassment of girls are not new, digital devices enable sexual violence to manifest with greater prevalence and persistence. Tech companies know about this but remain slow to act. The dynamics of technology-facilitated abuse are constantly evolving, but manifestations include:

- Image-based abuse: the non-consensual sharing of nude images and videos among peer groups, and unsolicited nudes (‘cyberflashing’).<sup>11</sup>
- Unwanted and persistent solicitation for nudes; the Ofsted Review found that girls can be contacted by up to 10 or 11 different boys a night asking for nude/semi-nudes.<sup>12</sup> The children we spoke to confirmed that harassment for nudes was commonplace.
- Anonymous trolling and ‘bait-out’ pages.
- Sexualised and body-shaming comments under photos and posts.
- Grooming by private message.
- Livestreaming of abuse, including coerced sexual acts on livestream platforms.
- Exposure to inappropriate spaces and experience of sexual abuse on VR platforms.<sup>13</sup>

**“Boys expect every girl to look the same... hour glass figure... these unrealistic beauty standards. They’re like ‘I wanna big butt but you have to have a thigh gap’. Like that doesn’t make sense.”**

Young person aged 16–21.

> Children rarely report online sexual harassment and abuse either directly to platforms, or to schools/colleges and parents.

- Young people lack faith in online reporting systems, complaining that they are slow and unresponsive. Furthermore, reports and removals are easily circumvented by offenders – e.g. by setting up a new account – and young people feel little is done to prevent this.
- Young people also told us that adults often don’t understand the dynamics of online abuse, and for this reason they feel there is little point in talking to a parent, carer or teacher about these issues. It was very troubling that a number of girls said they would fear being victim-blamed if their nudes were shared without consent.

## 2. Our findings on the legislative, regulatory and technical landscape

### > There is currently no legislation to prevent children from accessing pornography online.

This is in contrast to regulation of online gambling which requires proof of users' ages before transaction.<sup>14</sup> Unlike in the offline world where it is illegal, under the Video Recordings Act (VRA) 1984, to provide under-18s with adult content on videos, DVDs, etc. Adult platforms told us that they did not want children to access their sites, but that they were unwilling to implement age verification voluntarily as it would reduce traffic. They argued that ad-hoc AV would simply push users to alternative adult sites without verification – like when PornHub improved its safeguarding policies in January 2021, resulting in an increase in traffic to its less scrupulous competitor XVideos.<sup>15</sup>

### The challenges presented by DNS-over-HTTPS:

DNS-over-HTTPS (DoH) is a protocol which encrypts communication between browsers and internet infrastructure – essentially making it impossible for the internet service provider to “see” which websites a user is accessing. The goal of DoH is to increase user privacy and security, yet it also presents a profound challenge to the ability of ISPs and mobile operators to block sites which do not comply with age verification requirements – one of the key enforcement actions available to Ofcom under the Online Safety regime.

There doesn't appear to be a simple answer to this issue, at least not in the immediate term. It is incumbent on Government and Ofcom to develop a position before regulation kicks in. What is clear is that the “gatekeepers” to the internet are constantly shifting and regulation needs to be flexible to keep pace

### > Platforms are not doing enough to enforce minimum age requirements.

A large population of underage users have access to inappropriate content and features on social networking platforms, such as the ability to livestream and to privately message unknown adults. Most social media and messaging platforms have minimum age requirements in their terms of service - a requirement under the USA's Children's Online Privacy Protection Act (COPPA) 1998. However previous research by the Children's Commissioner's Office found that children as young as 8 and 9 held accounts on platforms with minimum age requirements of 13 and 16.<sup>16</sup>

**“Social media as it pressures us all to be perfect; have a perfect body, perfect face, perfect health and perfect life in general.”**

Girl, 15.

## What is age assurance?

“Age assurance” is an umbrella term encompassing methods to firmly **establish** someone's age – with use of a hard identifier (e.g. a driver's license or passport) and approaches to **estimate** a user's age (e.g. with analysis of facial, behavioural and linguistic characteristics).

The challenge for platforms is to establish (a) the level of risk posed to children and (b) the likelihood of children accessing the platform, and to (c) design proportionate age assurance solutions to mitigate these risks. Research by the Government (the [Verification of Children Online \[VoCO\]](#) project) and 5Rights (“[But how do they know it's a child?](#)”) consider the technical, commercial and legal challenges in greater detail and attempt to establish minimum standards and a framework for proportionate use of age assurance.

**Where and when should age assurance happen?** Age assurance is applicable to social media, messaging, gaming, gambling, dating and adult platforms – as well as on sites which sell age-restricted goods like alcohol and cigarettes. There are several points at which where age assurance can take place. A mixed economy will probably be key, giving users freedom to choose how and where they assure their age.

**On the App Store/Google Store:** App Stores already hold enough information on users to determine their age. Bank details are required to download apps on both. However, Apple and Google have been repeatedly [criticised](#) for not doing more to prevent underage users from downloading inappropriate apps – including adult dating platforms and apps containing pornography. At the very least, we think that App Stores should provide the option for users to verify their age using bank details to reduce the burden on smaller platforms.

**On the platform:** We heard from several tech firms that they are developing new technologies which use AI to estimate children's ages. This is promising. However, as these technologies develop we would like to see more transparency on how they operate. We would also like information about age assurance to be clearly and routinely communicated with users – including on how underage accounts are detected and removed.

**Via a third-party provider:** There are providers specialised for adult platforms, which take official ID (e.g. passport/drivers license/ bank details) to determine whether someone is over the age of 18. Importantly, information is communicated with the platform in a binary yes/no format so no personal data is shared with the site. Many providers delete personal information immediately following assessment.

Providers can also use proxy information like bank details to determine whether someone is above 18. Again, this is a helpful solution because it minimises the amount of personal information required.

Other providers specialise in estimating the age of children (e.g. by scanning facial features or asking the child to complete a puzzle) to assess whether they are old enough to use social media/ messaging/gaming sites. This is a far harder task, but technology is continually improving against both accuracy and inclusion measures.



- > Tech firms are not ensuring age-appropriate experiences, even when they *know* an account belongs to a child. This is an issue across all the mainstream social networking platforms we engaged with over the course of this commission.<sup>17</sup>

### The Age Appropriate Design Code

The ICO's Age Appropriate Design Code (AADC) came into force in September 2021. The Code requires online services which are "likely to be accessed by children" to adhere to 15 standards to protect children's data online. It is very encouraging to see the changes that platforms have already made as a result of this regulation, with widespread adoption of high privacy standards on many social networking sites. It demonstrates the positive effect that thoughtful regulation can take on the decisions of major tech firms. Many of the changes made as a result of the AADC have been implemented globally and will benefit children around the world.

**"Social media has helped me more than my own family. I wouldn't be in a happy relationship without social media. I wouldn't have half of my friends without social media."**

Non-binary, 17.

- > Adults, including teachers and parents, are often ill-equipped and reluctant to confront these issues. Children told us that they wanted their parents and teachers to be more involved in their online lives and to have the knowledge and tools to step in when something goes wrong. It takes a lot of bravery for a child to share their experiences of sexual abuse and harassment, however this is often not matched with proportionate action from adults.

### Our Parents' Guide to peer-on-peer abuse

Throughout this commission we worked with young people aged 16–21 to understand the dynamics of peer-on-peer abuse, using insights to produce a guide for parents on tackling sexual harassment – "[The things I wish my parents had known](#)". The guide has proved very popular with schools and has had the most hits of any page on website since its launch. It demonstrates the power of putting children and young people's voices at the heart of effort to understand and combat sexual violence.

**"I was pressured into watching horrific pornography that effects how young boys behave towards and think they can treat women. As a boy myself, I was unable to understand the everyday struggle of the girls in my class, then one day I did. I was ostracised for not cat calling girls in the class, watching pornography or sexually assaulting any girls."**

Boy, 16.

**"Most young people seek validation from others... especially young girls seeking validation from boys cos they might not get it elsewhere."**

Young person aged 16–21.

**"I think [life] has been more difficult for me as I have grown up with different things such as social media."**

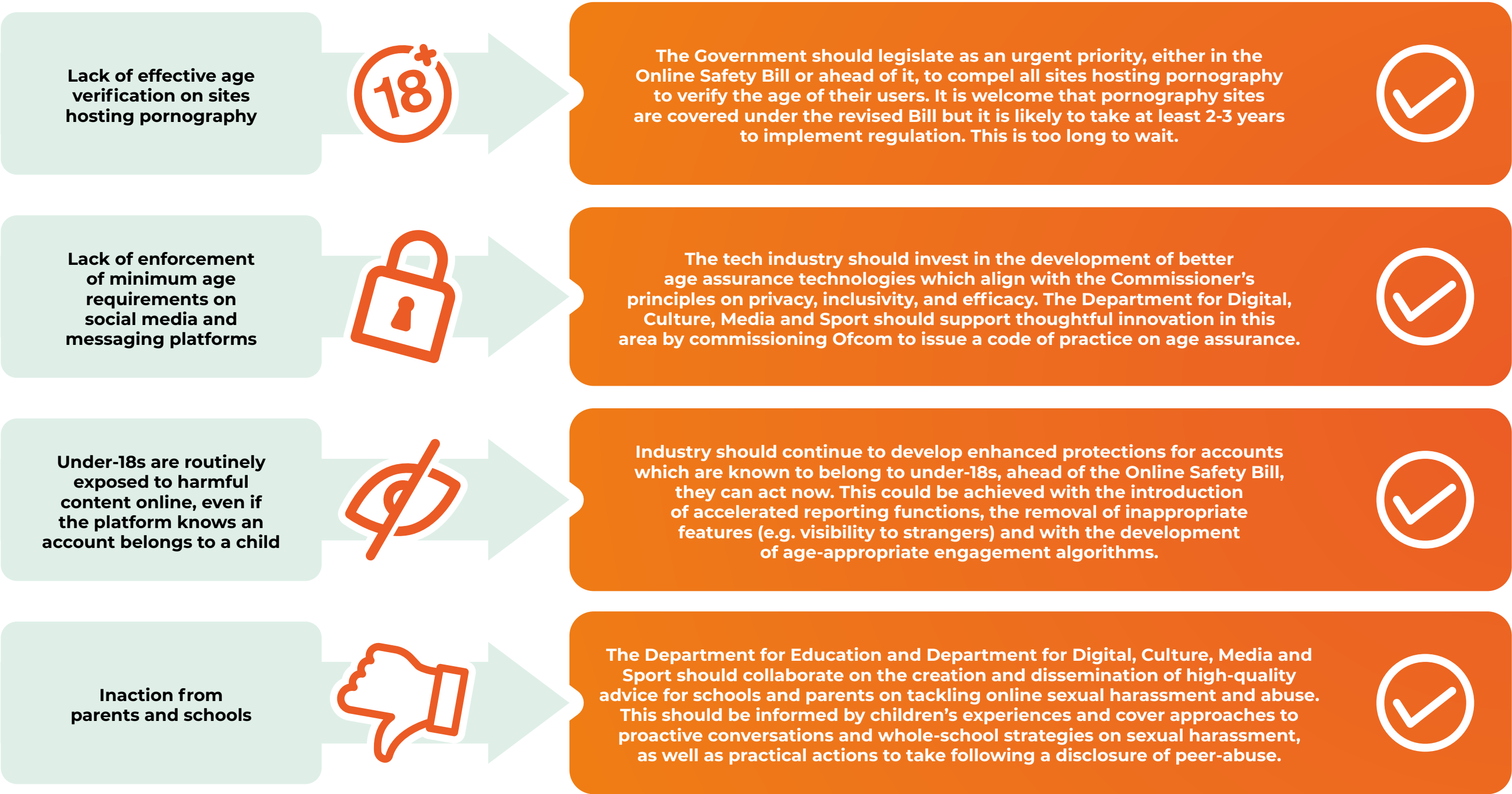
Child with a social worker.

# Section 3: The Commissioner’s recommendations

We believe that children’s safety online is a responsibility shared by the **Government**, by the **tech industry** and by **teachers** and **parents**. If any one of these groups fail to uphold their responsibilities, then children risk being exposed to harm – in particular vulnerable children such as those with SEND and in care.

In this section, we lay out our recommendations to each of these groups in turn.

## Overarching solutions to each of our key findings





# To Government

Now, ahead of the Online Safety Bill coming into effect:

## 1. Legislate as quickly as possible on children's access to pornography, if possible ahead of the Online Safety Bill

The Children's Commissioner is delighted that the Department for Digital, Culture, Media and Sport has confirmed that all pornography sites will be covered under the updated Online Safety Bill – not just those which enable user-to-user interaction or user-uploads as originally proposed. However, the Government could consider stepping in and legislating *now* on children's access to pornography, rather than waiting for regulation to take effect – which will take 2 years at minimum. We believe that Government have a mandate from children and young people to take urgent action on the harms caused by exposure to pornography.

This could be achieved through one of the following routes:

- > **Recommencing Part 3 of the Digital Economy Act 2017**
- > **Fast-tracking new legislation, separate yet aligned with the Online Safety Bill, requiring sites hosting pornography to age verify. This legislation should be regulated by Ofcom in the interim, alongside their active VSP regulation and should be incorporated into the Online Safety Bill once it is passed. We further recommend that this legislation aligns online and offline pornographic standards.<sup>18</sup>**
- > **Back Baroness Kidron's Private Member's Bill which sets out minimum standards for age assurance and expand its scope so that online pornography providers are *required* to use these systems.**

In addition, the Department for Digital, Culture, Media and Sport and Ofcom should consider strategic partnerships with payment providers including Visa, Mastercard and PayPal to terminate payment on adult sites which do not comply with regulation.

## 2. Provide clarity on expectations around age assurance

The Commissioner's roundtables with industry exposed the confusion felt by many major tech firms on the design of age assurance systems. Clear guidance from Government on the balancing of trade-offs between privacy and efficacy would help to encourage responsible and thoughtful innovation in this space. This should also help to mitigate users' concerns on the privacy and other implications of age assurance.

The VoCO project<sup>19</sup> - a cross-departmental research project exploring the barriers and opportunities for age assurance – was an important step forward and should be used as a basis for developing a code of practice. Guidance should be incorporated as a statutory code of practice as soon as the Online Safety Bill is enacted.

## 3. Provide additional funding for support services for child victims of online abuse

The Children's Commissioner warmly welcomed the Government's announcement that it would accept the Law Commission's recommendation to bring existing 'offline' offences into the Online Safety Bill. The introduction of extra offences on the face of the Bill including 'revenge porn', the promotion or facilitation of suicide and sexual exploitation will provide protection for all internet users, including children.<sup>20</sup>

These offences should be accompanied by additional funding for services to support child victims of online crime, particularly sexual violence and online image abuse. These should be based on the brilliant Barnahus model (exemplified by the Lighthouse Project in Camden) which provides therapeutic services and support through the criminal justice system.

## 4. Accept the Law Commission's recommendations on online offences

We are pleased that the Department for Digital, Culture, Media and Sport Ministers are actively considering the Law Commission's recommendations to create specific offences under the Online Safety Bill to tackle online harassment. In particular, we are delighted that the Government has announced a new offence of 'cyberflashing' will be included within the Bill. We strongly encourage Government to accept all of the Law Commission's recommendations in this area.

## 5. Develop a strategy for training RSE teaching on online sexual harassment and abuse

We welcome the introduction of compulsory RSE in secondary schools. We know that when the topic of how to tackle online sexual harassment and abuse are taught well, pupils find it useful, and it helps their confidence in navigating the online world, including knowing how to seek support where necessary. As such, high quality resources and material should be shared to support teachers in delivering the RSE curriculum to all pupils, as well as regular training for all teachers.

**"Social media...surrounds us, it constantly is in our brain and will always be around and it puts everyone down."**

Girl, 13.

# Our recommendations for the Online Safety Bill

As set out in our [interim findings report](#), we have a number of recommendations for the Online Safety Bill to ensure that this landmark legislation is as effective as it can possibly be for keeping children safe online.

- 1. Ofcom should be given the power to direct companies to use proportionate age verification and assurance on platforms which pose risk to children. This should be accompanied by good quality guidance on how these systems should operate in respect to data retention, inclusion, and efficacy.**
- 2. There should be a dedicated complaints and advocacy route for children, particularly when they are victim to sexual abuse online, based on the model of the Australian eSafety Commissioner. Trends in reporting should be used to inform Ofcom's policies and regulatory practices.**
- 3. Ofcom should have the power to direct companies to use proportionate and accurate tools to scan for child sexual abuse material (CSAM) and child sexual exploitation and abuse (CSEA) on private messaging platforms. Ofcom should not have to compile evidence on the prevalence or persistence of these crimes before it takes action.**
- 4. Tech firms should be required to share information with one other relating to child sexual abuse and exploitation (CSEA) on their platforms. Specifically, firms should be required to collaborate on:**
  - *detecting and removing offenders and reporting them to the police*
  - *eradicating child sexual abuse material (CSAM) from their platforms.*
- 5. Ofcom should be granted the power to impose criminal sanctions on senior managers in response to any serious breach of the duty of care, not just when platforms fail to share information.**
- 6. Standards on internet pornography should be aligned with offline standards on adult content – as they are already regulated by the BBFC.<sup>21</sup> This should ensure that extreme pornography (e.g. necrophilia, bestiality, life-threatening sex acts and acts involving serious violence) and harmful pornography (e.g. depiction of non-consensual, abusive and pain-inducing sex acts) are also prohibited in the online world.**
- 7. The Government should accept the Law Commission's recommendations to create specific offences, on the face of the Online Safety Bill. We are delighted that the Government has announced a new offence of 'cyberflashing' will be included within the Bill. We strongly encourage Government to accept all of the Law Commission's recommendations in this area.**

## To the tech industry

We would love to see more thoughtful innovation from the social networking and wider tech sector to keep children safe online. The Online Safety Bill, when in force, will mandate this (or firms will risk heavy fines or criminal liability if they don't). But we don't think there is any need to wait.

Children told us in no uncertain terms that it is *still* unsafe for them to exist on most mainstream social media and messaging sites, as well as on discussion forums and gaming platforms. This includes when they are above the minimum age requirement. The growth in VR environments like the Metaverse should be a real cause for concern if safety is not embedded in the earliest stages of product development.

Safety features should take account of different children's needs, in particular the specific needs of children with SEND and children in care. Children told us about the kinds of safety features they would like platforms to develop, which include:

### 1. Development of better solutions to age assurance

Age assurance is not a silver bullet, platforms need to be safe by design too. However, the majority of 16–21 year olds told us that age assurance is the *single* feature which they would introduce to keep a younger sibling or cousin safer online. Young people care about this and want platforms to do more to remove underage users.

We believe solutions should be designed carefully to (a) **protect personal data**, to (b) be **effective** in assessing age (and mitigating likely risk that children will lie about their age) and to (c) be **inclusive** of the needs of all children, including those with SEND and those without a stable home environment.

### 2. Introduce greater support for child victims of image-based abuse

It is unacceptable that victims of image-based abuse often do not report to a platform because they think that no action will be taken. Platforms should invest in better reporting functions and expand moderation teams, ensuring that systems are clear, easy to use and CSAM is taken down rapidly. Platforms should also signpost to high-quality support services for victims and their families.

As an additional step, we would also like platforms to communicate offences with one another to prevent the rapid spread of self-generated CSAM across multiple social networking platforms.

### 3. Ensure that reporting functions are visible, child-friendly and effective

### 4. Platforms which host pornography (i.e. do not restrict adult content under terms of service) should age verify users, at the very least on adult content

### 5. Platforms age-appropriate engagement and recommendation algorithms and be more transparent with users and regulators on their design

The vast majority of children told us that they had seen harmful or disturbing content on social media. Often this had been recommended to them on 'Discover' or 'For You' pages which cultivate content based on the user's interactions and interests.

Platforms should do more to screen harmful content and ensure that it is not recommended to accounts belonging to under-18s. We believe that tech firms should also be more transparent with children and with regulators / child protection experts on how their engagement algorithms operate.

#### 6. Ensure that child-safety settings are turned on across all accounts as a default

**“Just a few days ago some person pretended to be one of my friends online and started saying rude stuff.”**

Girl, 12.

### To the adult industry

#### 1. Implement robust age verification

We understand that there are commercial constraints which prevent adult sites from implementing age verification now, so long as their competitors are not also compelled to do so.

Yet *all* the adult sites with which we engaged agreed that they need to do more to prevent children from seeing harmful explicit content. The single greatest step any adult platform can make is to implement robust age verification. We would like the biggest industry players to lead the way here by committing to age verification as a priority.

#### 2. Greater industry-wide action on CSAM

A 2021 New York Times investigation found that Pornhub – the world’s largest adult site – was infested with child sexual abuse material (CSAM). This included material which had been repeatedly flagged to the platform by victims. The investigation led to Visa and Mastercard severing financial links with the platform, which now relies on payment by cryptocurrency.<sup>22</sup>

Following the NYT and Visa/Mastercard investigations, it was positive to see MindGeek take steps to clamp down on the prevalence of CSAM on Pornhub – including with the deletion of all non-verified user content. However subsequent investigations found that Pornhub’s biggest competitor, XVideos, is also teeming with illegal CSAM. We would like to see serious action taken across all adult sites, including on MindGeek’s smaller platforms. There should be no place for CSAM to hide.

#### 3. Enhanced reporting functions for child victims of image-abuse on adult sites

#### 4. On-site links to tools, information and advice for parents and children

While we wait for widespread adoption of proper age verification technology, we would like adult platforms to do more to support children who stumble across this content. Research shows that children as young as 8 regularly stumble across explicit content, this includes videos depicting serious sexual violence and rape and ‘extreme’ pornography (as classified by the BBFC).

Adult platforms should provide direct links to high-quality advice for both children and parents, as well as teachers and other professionals working with children who have viewed this content.

**“Now porn has infiltrated mainstream media, you can literally find porn on Twitter.”**

Young person aged 16–21.

### To schools and parents

We understand that these issues are challenging and complex. However, our key advice for parents and teachers is simple – start the conversation. The overriding message we heard from children is that adults should talk early and talk often. Children told us they want adults to create a safe, judgment free space for them to talk about these issues, both at home and in school. Children also want to be able to trust adults to help them if something goes wrong.

1. Have proactive conversations early and often, ideally when a child is given their first device or open their own social media account – whichever comes first. Use resources like our guide for parents [“The things I wish my parents had known”](#) and the NCA’s [#AskTheAwkward project](#)
2. Take time to learn about emerging technologies, trends and risks online, ask questions and allow children to be the experts
3. Be ready to step in and support if something goes wrong, know where to go for high-quality information and support including safeguarding procedures.



## Section 4: Next steps

Following the Government commission on online peer-on-peer abuse, we will continue our programme of work on tackling girls' experiences of sexual harassment and on the Online Safety Bill more broadly.

- > **Following the pledge agreed at the December Ministerial roundtable, we will write to the six tech firms in attendance to ask them for data on the number of children on their platforms – both underage and above the minimum age in terms of service – and challenge them where this information is unavailable. We will also request greater clarity on the nature and scale of harms these children experience on social networking platforms, including sexualised content and material promoting violence, self-harm and suicide. Again, where firms are *not* collecting this data we will challenge them to do so, and soon.**
- > **The Commissioner's Office will conduct research with children and parents to understand their concerns and experience of online harms and what protections they would like to see in the Online Safety Bill.**
- > **The Commissioner will closely follow the Online Safety Bill as it passes through Parliament. She will continue to place children's voices at the heart of the parliamentary and public debate and she will campaign to ensure that this landmark legislation is as effective as it can possibly be to keep children safe online.**
- > **The Commissioner's Office is planning work with Sexual Abuse Referral Clinics to understand the impacts of pornography on the sharp end of peer-on-peer abuse cases. We will also map out support services available to survivors of peer-on-peer abuse and understand what intervention services are targeted at perpetrators who have been influenced by pornography.**

**"I don't feel I was informed of my online safety from a young age and that it was considered a priority. Technology and social media are constantly developing so why aren't our laws and protections for children on these platforms updating with it?"**

Girl, 14.

## References

- 1 Ofsted (2021) [Review of sexual abuse in schools and colleges](#)
- 2 Government Equalities Office (2020) [The relationship between pornography use and harmful sexual attitudes and behaviours](#)
- 3 Companies in attendance: Apple, Google, Meta [Facebook, Instagram and Whatsapp], Snapchat, TikTok and Twitter
- 4 Ofsted (2021) [Review of sexual abuse in schools and colleges](#)
- 5 G7 GEAC (2021) [Building Back Better for Women and Girls](#)
- 6 Children's Commissioner's Office (2021) ["The things I wish my parents had known"](#)
- 7 5Rights (2021) [Pathways: How digital design puts children at risk](#) Section 4
- 8 Ibid.
- 9 CCO found that searches for 'pro-ana', 'thinspiration', 'pro ana binge' on Microsoft Bing and 'pro ana bing' on Google retrieved results for harmful so-called "pro-anorexic" websites and forums which promote eating disorders as a lifestyle choice and offer practical tips and support for eating disorder sufferers. [24/02/2022]
- 10 See also: Joint Committee on the Draft Online Safety Bill (October 2021) [Oral Evidence by Frances Haugen](#) p.16
- 11 Definitions are consistent with UCL IoE, SSE, University of Kent, ASCL (2021) [Understanding and Combatting Youth Experiences of Image-Based Sexual Harassment and Abuse](#)
- 12 Ofsted (2021) [Review of sexual abuse in schools and colleges](#)
- 13 BBC News (2022) ["Metaverse allows kids into virtual strip clubs"](#). Retrieved 4th March 2022.
- 14 Gambling Commission [Guidance on the prevention of underage gambling](#). Retrieved 23rd February 2022.
- 15 New York Times (2021) <https://www.nytimes.com/2021/04/16/opinion/sunday/companies-online-rape-videos.html>
- 16 Children's Commissioner's Office (2020) [Access denied: how end-to-end encryption threatens children's safety online](#) p.12
- 17 5Rights found that accounts belonging to under-18s on popular social media platforms were directly messaged and followed by unknown adults, and shown harmful content including softcore pornography (with links to more explicit content), extreme dieting, self-harm and suicide material. 5Rights (2021) [Pathways: How digital design puts children at risk](#)
- 18 BBFC (2019) [Classification Guidelines](#)
- 19 GCHQ, ACE, DCMS, HO (2020) [Verification of Children Online Phase 2 Report](#)
- 20 DCMS (2022) ["Online safety law to be strengthened to stamp out illegal content"](#) – retrieved 28/02/2022
- 21 BBFC (2019) [Classification Guidelines](#)
- 22 <https://www.nytimes.com/2020/12/10/business/visa-mastercard-block-pornhub.html>



**Children's Commissioner for England**

Sanctuary Buildings  
20 Great Smith Street  
London SW1P 3BT

Tel: 020 7783 8330

Email: [info.request@childrenscommissioner.gsi.gov.uk](mailto:info.request@childrenscommissioner.gsi.gov.uk)

Visit: [www.childrenscommissioner.gov.uk](http://www.childrenscommissioner.gov.uk)

Twitter: @ChildrensComm