

**The Children's Commissioner's  
response to Ofcom's *Guidance for  
service providers publishing  
pornographic content***

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March 2024

## Introduction

*"There are no like preventive measures in place [on pornography websites] to make sure that those people are over the age of 18, like for example in on YouTube, if you want to watch a certain kind of video like I'll say for example, I was trying to watch a video of a hip replacement surgery ... they asked me to prove I was over 18 by submitting a photo of ID, porn sites have absolutely nothing like that. They just say make sure you're over 18, but no one's obviously going to follow that. And they know that themselves."*

– Girl, 17.



This is a written response by the Children's Commissioner to Ofcom's consultation, *Guidance for service providers publishing pornographic content*, on the draft guidance for service providers publishing pornographic content under the Online Safety Act 2023.<sup>1</sup>

The Children's Commissioner, Dame Rachel de Souza, has a statutory independent role to protect and promote the rights of children in England and for children around the United Kingdom on issues reserved

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for the UK Parliament, with particular regard for children living away from home or receiving children's social care. Her priority is to bring the views and interests of children to the heart of Government.

Online safety is an issue reserved for the UK Parliament. The Children's Commissioner works closely with colleagues from the devolved nations to ensure that the views of children from around the United Kingdom are reflected on this issue.

Sections 41(6)(h) and 215(4)(e) of the Online Safety Act 2023 name the Children's Commissioner as a statutory consultee. The former requires Ofcom to consult the Children's Commissioner when creating or amending a code of practice issued under the Act.

## Content warning

This response addresses pornographic content found online, and makes reference to child sexual exploitation and abuse (CSEA), child sexual abuse material (CSAM), sexual acts, suicide and self-harm, sexual harassment and bullying, and violence. The Children's Commissioner's office (CCo) acknowledges that this content may be difficult to read. However, we think it is important to understand how harmful online content impacts young people, in order that we may better protect all children from harm. We encourage you to take care of your own wellbeing when reading this report.

## Receiving support

If you are affected by the issues discussed, the following organisations can provide you with expert information, advice and support:

The logo for Childline, featuring the word "childline" in a bold, lowercase, blue sans-serif font.

**Childline** is a free and confidential service for under-19s living in the UK: [childline.org.uk](https://www.childline.org.uk) | **0800 1111**



**Shout** provides 24/7 urgent mental health support: [giveusashout.org](https://www.giveusashout.org) | text **SHOUT** to **85258**

## Evidence

### Principles for codes of practice under the Online Safety Act

Since 2021, the Children's Commissioner has made online safety and delivering robust safeguards in the Online Safety Act a priority. Below is a summary of the key principles that she believes must be met in the implementation of the Online Safety Act.

In April 2022, the Children's Commissioner established six priorities for the success of the Online Safety Act, which were co-signed by 15 leading children's rights groups and internet safety experts.<sup>2</sup> These priorities are:

1. Place a duty of care on platforms and hold them accountable when children experience harm. Robust transparency reports and binding Codes of Practice will be key to this.
2. Require all platforms likely to be accessed by children to be in scope of the Act so children are protected everywhere they are online.
3. Require risky platforms to establish which accounts belong to children and offer higher levels of protection to them. Platforms should be required to implement privacy-preserving, inclusive, and effective age assurance technology, proportionate to the level of risk they carry. Safe services should not be required to introduce age assurance.
4. Cover all pornography sites and services and require these companies to implement robust, privacy-preserving age verification.
5. Align 'online' and 'offline' laws and protections.
6. Empower children's voices and rights in the digital world.

The Children's Commissioner was commissioned by the Secretary of State for Digital, Culture, Media and Sport and Secretary of State for Education to bring the voices of children to the Online Safety Act.<sup>3</sup> Published in March 2022, the following recommendations were made:

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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, and 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. 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 Act. We are delighted that the Government has announced a new offence of 'cyberflashing' will be included within the Act. We strongly encourage Government to accept all of the Law Commission's recommendations in this area.

These were accompanied by recommendations for the tech industry:

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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 the 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 should use 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.

These were accompanied by recommendations for the adult industry:

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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 (NYT) 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. 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.

In September 2022, the Children’s Commissioner published results from a survey of children and parents on children’s digital childhoods.<sup>4</sup> This report contained the following principles for the Online Safety Act:

1. Children’s voice: A strong, independent voice for children enshrined in the Act.
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2. Recognition of childhood: Ofcom should draw up a Code of Practice on proportionate age assurance as a priority. Standards should be privacy-preserving, inclusive, and effective. I urge tech firms to develop and roll-out technology which meets these principles ahead of regulation.
3. A collaborative approach: Platforms should be required to work together on child safety, sharing insights and best practice. This should include a requirement on platforms to share information on cross-platform child sexual abuse and exploitation (CSEA), such as 'breadcrumbing', and child sexual abuse material (CSAM)

In May 2023, the Children's Commissioner published evidence on pornography's influence on harmful sexual behaviours among children.<sup>5</sup> That report included the following recommendations:

2. The Act must ensure that all platforms which host pornography have robust age verification on adult content in place, and that the requirements to protect children from online pornography are consistent across all types of regulated services – both user to user sites and pornography providers.
3. The Act should mandate that all sites remove illegal content, including child sexual abuse material.

## **Summary of evidence on children's experience of pornographic content online**

In 2022, the CCo published analysis of a nationally representative survey of 2,005 children aged 8-17 and their parents.<sup>6</sup> It found:

- 65% of 8-12-year-olds use a social media platform and 91% of 13-18-year-olds do so.
  - Across seven platforms surveyed, between 36%-79% of users aged 8-17 are under the minimum age in the terms of service.
  - Most parents (67%) are concerned about the nature of content their children are exposed to online, and the majority of parents use online safety tools.
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- 45% of children aged 8-17 have seen content they felt was inappropriate or made them worried or upset. Boys were more likely than girls to have seen harmful content.
- Children with Free School Meal status were more likely to see every type of harmful content online.
- 50% of children who saw harmful content reported it, older children and girls are less likely to report harmful content.
- 40% of children who didn't report harmful content told us they didn't report because they felt there was no point in doing so, while only 15% felt that the content didn't need to be reported.
- Of children who did report harmful content to the platforms, 25% saw no action on their reports and 10% weren't sure whether anything happened as a result of their report. Girls were less likely than boys to see action on a report of harmful content.
- 70% of children (increasing to 75% of 16-17-year-olds) and 90% of parents think that social media platforms should enforce minimum age requirements.

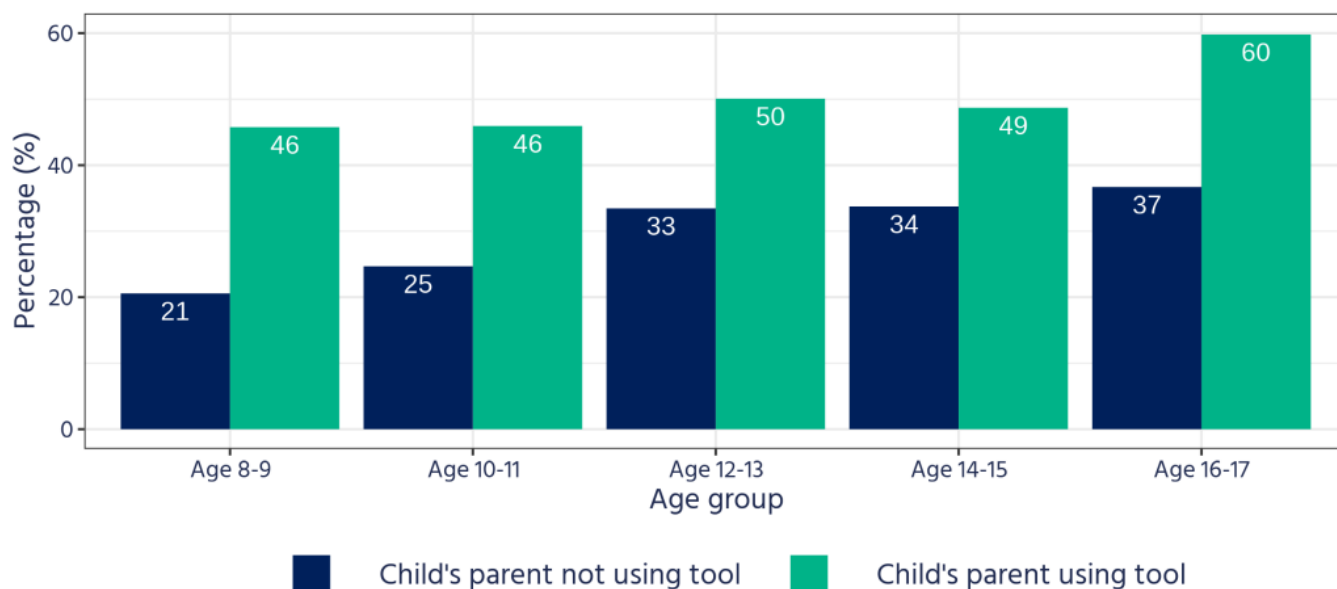
### Percentage of children aged 13-17 who saw harmful content in the last month by platform and type of content

	Anonymous Trolling	Sexualised images	Violent or gory content	Images of diet restriction	Pornography	Self-harm
Youtube	12	11	14	8	6	7
Whatsapp	10	9	8	5	6	5
Twitter	18	11	11	8	8	8
Tiktok	15	15	12	7	8	7
Snapchat	12	12	11	8	8	7
Instagram	14	12	10	10	7	6
Facebook	17	10	11	7	8	8



Note: Sample size is 848 for Whatsapp, 708 for TikTok, 733 for Instagram, 668 for Snapchat, 857 for Youtube, 470 for Twitter, 657 for Facebook.

### Percentage of children who have seen inappropriate content by age and use of parental monitoring/filtering tools



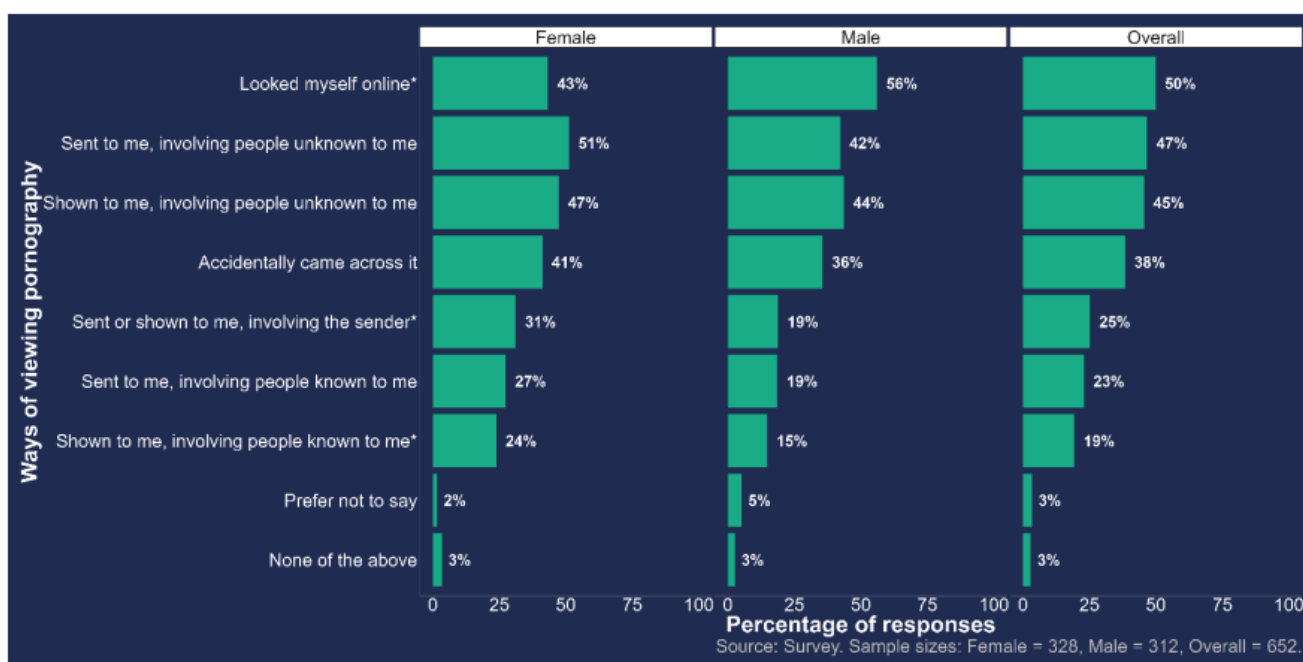
Note: Sample size is 1746 (excludes children who responded 'don't know' or 'prefer not to say').  
All differences within age groups are statistically significant

In 2023, the CCo published research from focus groups with teenagers aged 13 to 19 and a survey of 1,000 young people aged 16-21 on their experiences of pornography online.<sup>7</sup> It found:

- 64% of those aged 16-21 said that they had seen pornography online.
- Many children are first exposed to pornography at a very young age: of children who had seen pornography, 10% had seen it by age nine, 27% had seen it by age 11 and 50% had seen it by age 13.
- The average age at which children who had seen porn first saw porn was 13.
- 41% of young people reporting having seen pornography on Twitter, dedicated pornography sites came next, followed closely by Instagram, Snapchat and search engines. Further information is provided in the table below.

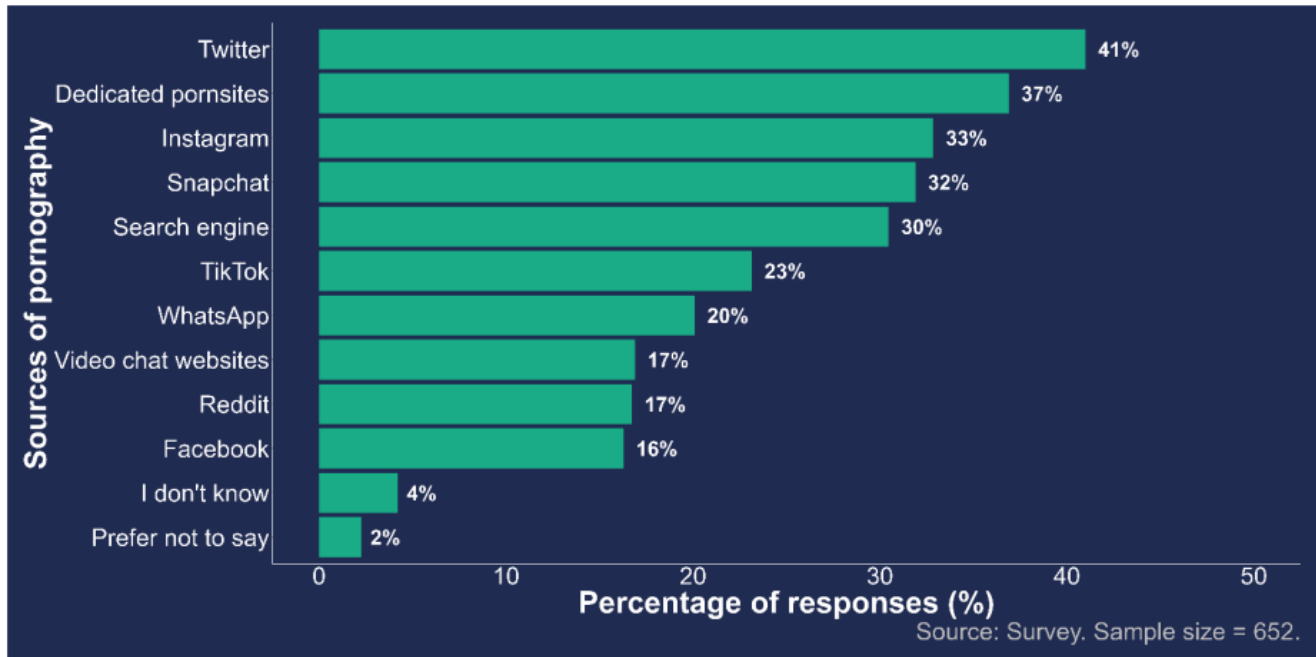
- Children often stumble accidentally across pornography online; 41% of 16-21-year-olds said that they had accidentally come across pornography online. Further information is provided in the table below.
- Among young people, 35% had experienced a physically aggressive sex act with a partner.

**Percentage of respondents aged 16-21 who selected each route to viewing pornography (includes only those who had ever viewed online pornography)**



Note: An asterisk (\*) denotes a statistically significant difference by gender.

**Percentage of respondents who selected the top 10 ways of viewing pornography (includes only those who had ever viewed online pornography)**



In 2023, the CCo published an analysis of pornography’s influence on harmful sexual behaviour, based on case files on child-on child sexual abuse from police and Sexual Assault Referral Clinic.<sup>8</sup> It found:

- 50% of police transcripts of interviews with children who reported sexual abuse carried out by another child contained at least one term referring to an act of sexual violence commonly portrayed in pornography.
- Manual review found instances of both police and children drawing direct links between the incident of abuse and the abuser’s exposure to pornography.

**Children’s voice on pornographic content online**

Below is a brief summary of what the Children’s Commissioner has heard from children on pornographic online.<sup>9</sup>

## **Online safety**

*"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.*

*"[...] I think some of the social media is not safe or should not see. People shouldn't be putting up picture that not meant for them to post it online because it will be on the internet forever." – Boy, 10.*

*"Restrict social media usage and make it safer to use. More and more younger children have easy access and this ruins their childhood and future." – Girl, 16.*

*"The Government could help keep children safe online by blocking unsafe or inappropriate websites on a majority of devices, or making it so that you have to enter your age before clicking on websites that could be unsafe to protect children." – Girl, 12.*

*"Start by increasing what is included in the Online Safety Bill. Too many people have their lives ruined at our age by other idiots [...]" – Boy, 17.*

*"I think sometimes you can end up finding stuff like that without even meaning to. Whether it's social media and ads come up that you're not even looking for." – Girl, 13.*

*"[...] Protect children from harmful ideologies found on social media and school." – Girl, 17.*

## **Intimate images and sexual harassment**

*"They will be more likely to interact in a pornographic manner with their peers (either sending or saving nudes, groping etc)." – Young woman, 19, first saw pornography at age 12.*

*"Gangs, drugs, nudes, peer pressure." – Girl, 17.*

*"[Bait-out pages<sup>1</sup>] will write children's names and what they are doing, maybe having sex with someone, or giving head or something. [...] They don't get taken down, and if you report it they make another account. If you report it, it has already been sent around." – Girl, 16.*

*"You see it on Snap or Insta, bait out pages for different schools. [...] So you can't really escape it, it's everywhere. There are thousands of bait out pages on Insta or Snapchat of people doing things that are explicit and stuff like that." – Young person, 16-21.*

*"I am sick of sexism. It's at home. It's at school. It's online. It's outside. Sexism affects me and so many other girls, it needs to change. Girls in my school are shamed for having sex or sending nudes whilst boys are praised." – Girl, 15.*

### **Extreme pornography**

*"A lot of online pornography can be unrealistic and some of it is rape content, so young people may think this is okay and realistic. When in reality it is not acceptable, it teaches incorrect and disgusting behaviours." – Young woman, 18, first saw pornography at age 12.*

*"Child pornography websites are a gigantic problem. [...] Help women and young ladies to feel safer. Otherwise I fear what the future for women will be like." – Girl, 13.*

*"There are no like preventive measures in place [on pornography websites] to make sure that those people are over the age of 18, like for example in on YouTube, if you want to watch a certain kind of video like I'll say for example, I was trying to watch a video of a hip replacement surgery ... they asked me to prove I was over 18 by submitting a photo of ID, porn sites have absolutely nothing like that. They just say make sure you're over 18, but no one's obviously going to follow that. And they know that themselves." – Girl, 17.*

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<sup>1</sup> Bait-out pages are online accounts – particularly on Instagram and Snapchat – which invite users to share nude images, videos or sexual gossip about others. Our young people told us that some pages are followed by thousands of other young people and allow gossip and nudes to spread rapidly.

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*"Many of my friends have self-harmed, had eating disorders or had suicidal thoughts. [...] Pornography, occasionally involving underage characters (regarding hentai), is something many pre-teen to early teen children have been exposed to - it can be disturbing and leave children with a very complicated relationship with the concept of sex. This is something which has become normalised." – Child, 15.*

*"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.*

*"Now porn has infiltrated mainstream media, you can literally find porn on Twitter." – Young person, 16–21.*

*"At that young age you don't really know what's right and wrong and you just follow whatever you see on porn sites." – Young person, 16-21.*

*"Stop boys from thinking all girls and women are for is to have sex with or abuse. [...] They talk about porn all the time and watch it all the time, play it on their phones. [...] I don't know what the government can do but maybe they can make it illegal for them to watch porn or somehow stop them being able to get onto the apps and sites AND actually tell schools to punish and exclude boys who touch girls or take pics of us, or yell out sexual things to us. I don't feel safe and I haven't since I was 8!!!" – Girl, 14.*

*"Often times porn is not just sex, but showcases a range of violent kinks like choking and spanking etc, specifically with a woman being the recipient ... young children who come across porn are also more likely to try to recreate these sexual behaviours with their peers as they have been exposed to it." – Young woman, 21, first saw pornography at age 14.*

*"I was exposed to pornography at a young age and it's affected me in my adult relationships and my body image and how my sex life is currently." – Young woman, 18, first saw pornography at age 11.*

*"It makes boys think they can do everything they see in porn in real life. Some things like anal are everywhere in porn but most girls don't want to do that. Boys just think it's normal and expect us all to do it and it puts pressure on us." – Girl, 16, first saw pornography at age 10.*

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## Response

### Key comments

- The Children's Commissioner is a statutory consultee on codes of practice under the Online Safety Act, and has a specific statutory role in ensuring that children's rights, views and interests are considered in its implementation.
- Overall, we consider that the draft guidance lays out a framework for effective age assurance for service providers publishing pornographic content, as they relate to the Act's Part 5 duties. The CCo considers that the guidance should include a clear definition of the standard required for a method to be highly effective, as defined in the Act.
- We note that measures to ensure that children do not interact with user-generated pornographic content or on user-to-user services (within the Act's Part 3 duties) will be addressed in the forthcoming children's code. This is critical to achieving the aims of the Act, as CCo's research outlined above has demonstrated that significant numbers of children encounter pornography on social media platforms and in the case of Twitter / X more commonly than on dedicated pornography sites. It is not possible to fully assess the protections for children in the draft guidance without reference to the forthcoming draft children's code. The CCo may make further comments on the guidance in its response to the children's code, when this has been published.
- The CCo supports measures to mitigate efforts to circumvent age assurance and, in addition, recommend that Ofcom commit to researching circumvention methods, through research with children and by engagement with service providers.
- The CCo supports the accessibility measures for publicly available statements. We recommend that Ofcom stipulates that these statements are accessible and can be easily understood by children, and by their parents, caregivers and families, as well as professionals working with children, such as teachers. It is essential that adults are able to understand how age assurance works and are able to take responsibility for mitigating attempts to circumvent it.

- The CCo encourages Ofcom to consider how it is incorporating the voice of children into its consultations and ongoing engagement with children on their experience of the online world. We strongly advise that Ofcom should produce child-friendly consultation documents for the forthcoming draft children's code so that children are able to engage with the measures designed to keep them safe online.

## **Guidance on scope**

- The CCo supports the scope of these proposed measures, as they relate to the Act's Part 5 duties.
- We note that measures to ensure that children do not interact with user-generated pornographic content or on user-to-user services (within the Act's Part 3 duties) will be addressed in the forthcoming children's code. This is critical to achieving the aims of the Act, as CCo's research outlined above has demonstrated that significant numbers of children encounter pornography on social media platforms and in the case of Twitter / X more commonly than on dedicated pornography sites.

## **Guidance on age assurance duties**

- The CCo strongly supports the Online Safety Act's requirement for a standard of 'highly effective' age assurance. We support Ofcom's criteria that this age assurance method should be technically accurate, robust, reliable, and fair. The CCo considers that the guidance should include a clear definition of the standard required for a method to be highly effective, as defined in the Act.
- The CCo supports the use of the British Board of Film Classification's (BBFC) definition of pornographic content.
- The CCo strongly supports requiring service providers to mitigate efforts to circumvent age assurance and prohibiting them from hosting content promoting methods to do so, such as virtual private networks (VPN). In addition, we strongly recommend that Ofcom commit to researching methods that children may use to circumvent age assurance, through research with children and by engagement with service providers on methods of users attempting to circumvent age assurance or of children who are later identified after successfully doing so.

- With all age assurance methods, the CCo encourages Ofcom to consider how this may open children up to additional risks if they were to attempt to circumvent age assurance. For example, the CCo supports the guidance on mitigating age assurance via the use of fake or someone else's ID. The CCo would encourage Ofcom to consider perverse incentives for children to undertake harmful actions to circumvent age assurance, for example, by using their parents' credit cards without permission.
- The CCo strongly supports implementing age assurance at the point of entry to the site and service providers being required to ensure that children cannot access pornographic content without going through age assurance.
- The CCo has concerns about the lack of specificity provided for the following age assurance methods: facial age estimation, digital identity wallet, and 'other methods that fulfil each of the criteria'. Any age assurance methods should meet the strictest standards of against the criteria of technical accuracy, robustness, and reliability.
- The CCo supports excluding the following as valid methods of age assurance: self-declaration of age, age verification through online payment methods which do not require a user to be over the age of 18, and general contractual restrictions on the use of the regulated service by children.
- The CCo generally supports platforms adopting a 'challenge age' approach, noting that this should be set at age 25 or 30 to allow an appropriate margin of error. We note that age estimation would be the first step in this age assurance process and would be fatally undermined by poor effectiveness. Age estimation, in contrast to other proposed methods of age verification, must be held to the highest levels of technical accuracy, robustness, and reliability.

## **Guidance on the record-keeping duties**

- The CCo generally supports the record-keeping duties in the guidance. Given that the legal duty is for service providers to keep records on how they meet age assurance duties, the CCo strongly supports the requirements for service providers to include in their written record details relating to performance, test process, and evidence against the criteria of technical accuracy, robustness,

and reliability. This should include a full and accessible statement on how the service provider has made the assessment that it's age assurance is highly effective.

- The CCo supports the accessibility measures for publicly available statements. We recommend that Ofcom stipulates that these statements are accessible and can be easily understood by children, and by their parents, caregivers and families, as well as professionals working with children, such as teachers. It is essential that adults are able to understand how age assurance works and are able to take responsibility for mitigating attempts to circumvent it.

## **Assessing compliance with age assurance and record-keeping duties**

- Throughout the guidance, we support the clear identification of examples of non-compliance with the age assurance duties.
- The CCo recognises that Ofcom, as regulator, is guided by enforcement principles with a bias against intervention, particularly during the transition period for the new regulatory regime. However, we strongly urge Ofcom to prioritise children's safety from accessing pornographic content online and to enforce compliance with online safety duties robustly and swiftly.
- The CCo welcomes transparency in the enforcement of the online safety duties. To this end, we welcome regular engagement with Ofcom throughout the transition period, including updates on compliance by service providers.

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## References

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- <sup>1</sup> Ofcom, *Guidance for service providers publishing pornographic content*, [Link](#), accessed on 04/03/2024.
- <sup>2</sup> Children's Commissioner, *Briefing to MPs on the Online Safety Bill*, [Link](#), accessed on 04/03/2024.
- <sup>3</sup> Children's Commissioner, *Online Safety Commission from Government: Our recommendations for making the online world safer for children*, [Link](#), accessed on 04/03/2024.
- <sup>4</sup> Children's Commissioner, *Digital childhoods: a survey of children and parents*, [Link](#), accessed on 04/03/2024.
- <sup>5</sup> Children's Commissioner, *Evidence on pornography's influence on harmful sexual behaviour among children*, [Link](#), accessed on 23/02/2024.
- <sup>6</sup> Children's Commissioner, *Digital childhoods: a survey of children and parents*, [Link](#), accessed on 04/03/2024.
- <sup>7</sup> Children's Commissioner, *'A lot of it is actually just abuse': Young people and pornography*, [Link](#), accessed on 04/03/2024.
- <sup>8</sup> Children's Commissioner, *Evidence on pornography's influence on harmful sexual behaviour among children*, [Link](#), accessed on 04/03/2024.
- <sup>9</sup> Children's Commissioner, *A lot of it is actually just abuse': Young people and pornography*, [Link](#); *Briefing to MPs on the Online Safety Bill*, [Link](#); *Digital childhoods: a survey of children and parents*, [Link](#); *Evidence on pornography's influence on harmful sexual behaviour among children*, [Link](#); *Online Safety Commission from Government: Our recommendations for making the online world safer for children*, [Link](#); *The things I wish my parents had known: Young people's advice on talking to your child about online sexual harassment*, [Link](#). This response also includes previously unpublished quotes from [The Big Ambition](#).



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