

“I’ve seen horrible things”: children’s experiences of the online world

October 2024

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Content warning

This report contains details about the harmful material children encounter in the online world, including descriptions of sexual abuse. It also makes reference to suicide, as well as mental ill-health including self-harm and eating disorders. This content may be difficult and upsetting to read. However, we think it is important to highlight the nature of the content children are exposed to online.

If you or any child you know of are affected by the issues discussed, the following organisations can provide you with expert information, advice and support.



ONLINE, ON THE PHONE, ANYTIME
childline.org.uk | 0800 1111

Childline is a free and confidential service for under-19s living in the UK:

www.childline.org.uk | Call 0800 1111



shout
85258
here for you 24/7

Shout provides 24/7 for urgent mental health support via text:

www.giveusashout.org | text SHOUT to 85258



Stop it now

Stop It Now helpline is for anyone worried about child sexual abuse, including their own thoughts or behaviour.

www.stopitnow.org.uk | Call 0808 1000 900



Beat
Eating disorders

BEAT Eating Disorders is a charity that provides advice and support to people living with eating disorders.

www.beateatingdisorders.org.uk | 0808 801 0677

SAMARITANS

Samaritans helpline is for anyone struggling with suicidal thoughts, or thoughts of wanting to harm themselves.

www.samaritans.org | 116 123

You can also contact **your local NHS urgent mental health helpline** or call **111** for 24/7 advice | **www.nhs.uk/nhs-services/mental-health-services/where-to-get-urgent-help-for-mental-health/**

If you have any concerns about the safety of a child, you should contact police by calling 999 or the local authority's children's services. You can also contact the NSPCC helpline with enquiries about contacting your Local Authority Services by calling **[0808 800 5000](tel:08088005000)** (11am–5pm Monday to Friday) or **[emailing help@NSPCC.org.uk](mailto:help@NSPCC.org.uk)**

Foreword from Dame Rachel de Souza



The online world has evolved significantly since I started as Children's Commissioner in 2021. A technological revolution followed the COVID-19 pandemic - featuring the launch of new Artificial Intelligence (AI) tools into the public realm and the increasing presence of social media platforms in the lives of children. As we mark the first anniversary of the Online Safety Act 2023, which intended to make the UK the safest place to be a child online, this report reveals how far we are from realising this ambition, based on children's own experiences.

As Children's Commissioner, I want to see an urgency in the pace of change from government and the tech companies that matches the speed of evolution that we are seeing online.

Children are digital pioneers and we need to listen, learn and act on what they tell us - especially when it comes to the online world.

Earlier this year, the findings in my *Big Ambition* survey set out the issues that matter most to children. Of the 367,000 children and adults who engaged on their behalf, online safety emerged as a key area. Anyone who has spent any time speaking to children will not be surprised by this. The lines between their lives online and lives offline have blurred. These two previously distinct worlds have collided, and it is our duty as adults to keep pace with this, to help children harness the good and the bad.

One of the other key findings from *The Big Ambition* was that only one in five children feel that they are listened to by decision makers, yet this is a generation that is ambitious, passionate and brimming with ideas for change. They just need decision makers to listen.

It's clear they want to engage with all the opportunities that the online world offers them - the chance to socialise, learn and play in online spaces – but it must be in a safe way.

Their experience online is entirely different to that of adults, and they are affected by content in different ways. Content that adults may not find harmful can be extremely damaging for children. For example, the impact misinformation has on children as we saw this summer. The riots in Southport demonstrate the extreme consequences of failure to tackle and correct misinformation, and how swiftly it can take root.

Research by my office has found that 91% of children aged 13 to 18 in England use a social media platform¹. This report illustrates what it is like for them.

Despite 71% agreeing they felt safe online, children shared concerning details about some of the harmful things that happen to them there. The online world should be treated like every other space that provides a service to children: it must be built with their safety at its core.

The implementation of the Online Safety Act is moving at a pace far slower than the growth of new technologies and the technology companies that develop them.

Children are not only being left to contend with harmful elements of the online world which are provided for in the legislation but are also being exposed to new risks and harms. They are being asked to wait for protections to be put in place for them, and in the meantime, my office is finding that many of them are being harmed in the process.

Some groups of children feel particularly exposed, with children as young as five, and children with Special Education Needs and Disabilities (SEND) both disproportionately reporting that they feel unsafe.

Children have shared how images and tools on social media platforms are impacting the way they feel about themselves. Those children who do not feel safe online are particularly affected, with just 28% of them agreeing that they were happy with the way they look – this is a shocking statistic.

Today I am repeating my call for urgent action to both technology companies and the government – and to all those who are responsible for children’s safety online.

We cannot afford to be passive, or we risk failing this generation and generations to come.

With the regulations being designed by Ofcom, we have the opportunity to create a regulatory regime that is fit to properly grapple with the multiple hazards that exist in the online world and take decisive steps to prevent them. But at the moment, the safety of children remains unacceptably subject to the whim of technology companies.

Children know this – too many have told me their voices are going unheard, and their experiences on social media sites ignored by the companies set to profit from them. We must all listen to what they are telling us and then act.

Alongside this report I am publishing my response to Ofcom’s Children’s Code consultation, which makes practical recommendations for how the principles laid down in this report should be put in place, based on children’s own views. A safe online world is my minimum expectation for children’s digital futures.

My ambition for children is for them to be able to learn and develop safely online, benefitting from every advantage available to them with the risks removed. Every child should believe their safety is being prioritised in the same way it is at school or in the local park with the knowledge that they are safe from harm.

Given the pace of the technological revolution we have seen in the last year alone I know that it is possible to do better, to go further and far sooner if the intention and resources are put in the right place. That’s the only way the UK can live up to its promise: that the UK would be the safest place in the world for a child to be online.

The Online Safety Act signalled the start of a new era for online regulation and now we need to listen to the voices of our children and act with hope and determination.

Executive summary

“I think the Government should do more about protecting children on the internet. Of course, it is very hard but just educating about the dangers of the internet is not enough” – Girl, 17.

A year has passed since the Online Safety Act 2023 became law. This Act, a landmark piece of legislation, was welcomed by the Children’s Commissioner, following her extensive campaigning, as an important step towards a new era of the online world: one that presented an opportunity for children to learn, play and develop there safely.

One year on, the legislation has yet to be implemented and important decisions regarding what those regulations will look like remain unclear. This report illustrates the extent to which children are still experiencing harm online. It sets the Children’s Commissioner’s expectations for the future of online safety policymaking, and bolder steps towards robustly protecting children online.

This report draws on the responses of 253,000 children and adults to *The Big Ambition*: a large-scale consultation of children in England carried out between September 2023 and January 2024.² The survey asked a broad set of questions about their lives, and in response, children shared their views on what they think needs to change to make their lives better. One of the areas they wanted action on was online safety.

Children told the Children’s Commissioner’s Office that some children are more vulnerable to online harms than others, and that a variety of content and non-content factors cause them harm online. They also shared their views on who should take responsibility and make the online world safer for them. This report sets out what they said:

Some children are more vulnerable to online harms than others:

- **Younger children were more likely to feel unsafe online than older children.** By the time they reached 13, the minimum age limit to hold an account on some social media platforms, agreement about feeling safe online had risen from 38% at the age of five, to 78% at the age of 13.

- **Children who disagreed that they felt safe online responded negatively to the statement “you feel happy with the way you look”.** Only 28% of children who said they did not feel safe online agreed with this statement, compared to 54% of those who said they did.
 - **Children with SEND were less likely to feel safe online than those without SEND.** Children with no SEND reported higher levels of agreement that they felt safe online than those with SEND, with agreement rates of 74% and 65% respectively.
 - **The provision of offline support for children influences their feelings of safety online.** Notably, children with SEND in special schools had a higher agreement rate than children with SEND who were not in education, at 55% and 45% respectively. The support schools can offer SEND children appears to be linked to their feelings of safety online. A similar trend emerged from the responses to the statement “you have someone supportive to talk to about how you feel”, with children who agreed having a higher agreement rate with the “you feel safe when you go online” statement than those who disagreed, at 85% and 73% respectively.
 - **Children who attend independent schools were more likely to agree that they felt safe online than those who attended state-funded schools.** This gap was present both between independent and state-funded mainstream schools, and between independent and state-funded special schools. Children in independent mainstream schools had an 81% agreement rate with the statement “you feel safe when you go online”, while children in state-funded mainstream schools had a 71% agreement rate. Similarly, independent special schools had a 68% agreement rate, whereas state-funded special schools had a 52% agreement rate.
 - **Children who disagreed they felt safe online were less likely to agree that they felt empowered to change issues they care about.** 56% of children who felt safe online also agreed that they felt empowered to change issues they care about, but only 48% of those who did not feel safe online agreed.
 - **Children who feel unsafe online were less likely to agree with other positive statements in *The Big Ambition*.** *The Big Ambition* survey was wide ranging, and in the responses to all 20 of the statements, the children who disagreed with the statement “you feel safe when you go online” were less likely to agree with the other 19 statements.
-

Online harms are evolving alongside technology:

- **Children’s wellbeing is affected by content that adults may not recognise as always harmful.** Children gave examples of how elements of the online world that are not named on the face of safety legislation impacts them negatively, such as content that negatively impacts the way they see themselves.
- **Cyberbullying emerged as a key concern for children.** Children’s experience of cyberbullying was the result of cross-cutting elements of the online world, involving both the online and offline space, some design elements of platforms (for example, sharing content across multiple platforms) and harmful content types. School was identified as a site for intervention in some survey responses.
- **Children do not feel in control of their online lives.** Children reported concerns about phone addiction and the influence platforms’ algorithms have on their lives and the way they experience the online world.
- **Harmful content is becoming more sophisticated to circumvent regulations.** This includes how some users were able to game online platforms’ existing safety measures – for example, children explained they had found pornographic imagery hidden in images to evade content moderation systems.
- **Children are worried about the future of their online lives.** In a roundtable discussion for this report, young people cited the development of new technology such as generative AI tools as a concern, describing how AI is being used in some social media platforms’ image editing tools.
- **Children want greater action to be taken on online safety.** Children told the office that existing measures have had very little impact on their day-to-day experiences of being online, and have named technology companies, the government and parents as people who should help them.

Action is needed now to make the online world safe for children:

The Children’s Commissioner has three main ambitions for online safety: for every child to be able to play and learn online safely; for every child to have the knowledge and support to be safe online; and

for every child to be protected from online harms, with services that can effectively safeguard and support them. For this ambition to be realised, the following must happen:

- 1) **Ofcom must implement the Online Safety Act as a matter of urgency.** Ofcom must expedite their current implementation roadmap and bring the Act into force in advance of their current deadline. Sufficient staffing and resources must be dedicated to making this happen.
- 2) **Ofcom needs to take a stronger, more preventative approach to harm.** Ofcom must establish a register of all online platforms that are active in the UK, and all technology companies should be required to assess for children's safety during product testing prior to launch. The Children's Code must be updated to be comprehensive and address all risks identified by Ofcom in the Register of Risks.
- 3) **Ofcom must revise the Code to put the interests of children ahead of corporate ones.** Financial burden on companies should not be used as a justification for companies not putting in place measures that would keep children safe online, nor should it be used to justify Ofcom not recommending that they implement them in the first place.
- 4) **Ofcom must establish a framework for consulting children.** This framework must provide children's meaningful participation in the design, implementation and monitoring of online safety measures. Technology companies should be obliged to consult child users through this framework.

In this report the Children's Commissioner sets out her expectations for the regulators, developers and leaders of the online world. This report should be received as a call for bolder action to safeguard children in the online world – a place they should be able to learn, play and develop safely.

1. Context matters: some children are more vulnerable to online harms than others

The Big Ambition survey ran between September 2023 and January 2024. It was a national survey which received responses from 253,000 children and adults responding on their behalf in England. Children were asked whether they agreed with a wide range of statements about their satisfaction with life, including a question on whether they felt safe online³.

The office's analysis shows that while most children feel safe online, some children were more likely to agree than others:

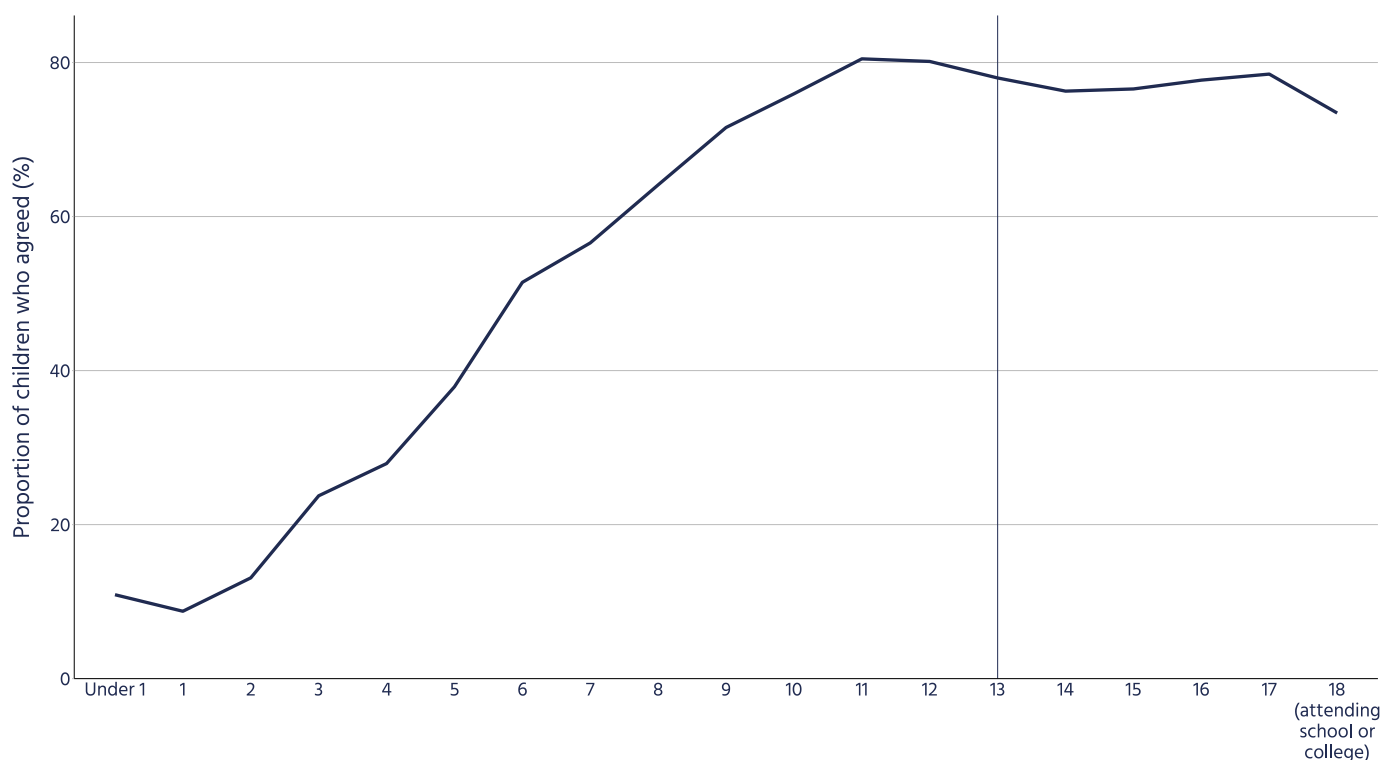
- 75% of children responding on their own behalf agreed that they felt safe online, but only 52% of adults answering on behalf of a child agreed.
- Responses on behalf of children aged under six were the least likely to agree that they felt safe online (31%), for comparison 67% of those aged six to 11 and 78% of young people aged 12 to 18 agreed with the statement.
- Girls were less likely to agree that they felt safe online relative to boys, with 67% of girls and 75% of boys agreeing.
- Children with SEND were less likely to agree they felt safe online than children with no SEND, with an agreement rate of 65% and 74% respectively.
- Children living in a mental health hospital felt the least safe online, with 43% agreeing with the statement, and 47% of those living in supported accommodation.
- There is a gap between how safe children in mainstream and independent education settings feel. Children in independent mainstream and independent special schools had a higher agreement rate than their state-funded counterparts. Children in independent mainstream schools had an 81% agreement rate, while children in state-funded mainstream schools had a 71% agreement rate. Similarly, independent special schools had a 68% agreement rate, whereas state-funded special schools had a 52% agreement rate.

The Children’s Commissioner’s office analysed 1,545 of the open text responses to the question “What do you think the Government should do to make children’s lives better?” – those containing at least one word or phrase related to both the concept ‘online’ and the concept ‘harm’ – to examine what changes children want to see with respect to online harms. A full list of the search terms used is shown in the Methodology.

1.1. Age impacts how safe a child feels online

“Some videos “sneak” onto platforms that are meant to be vetted for content ... this was distressing for my 2 young children however they knew it was wrong and told me straight away.” – Adult on behalf of boy, 6.

Figure 1: Percentage agreement with the statement “I feel safe when I go online” by age



The degree to which children feel safe differs with age. *The Big Ambition* found that the youngest children were the least likely cohort to agree that they felt safe online. The proportion agreeing with the

statement increased from 38% for respondents on behalf of children aged five to 80% of children and adults responding on their behalf age 11.

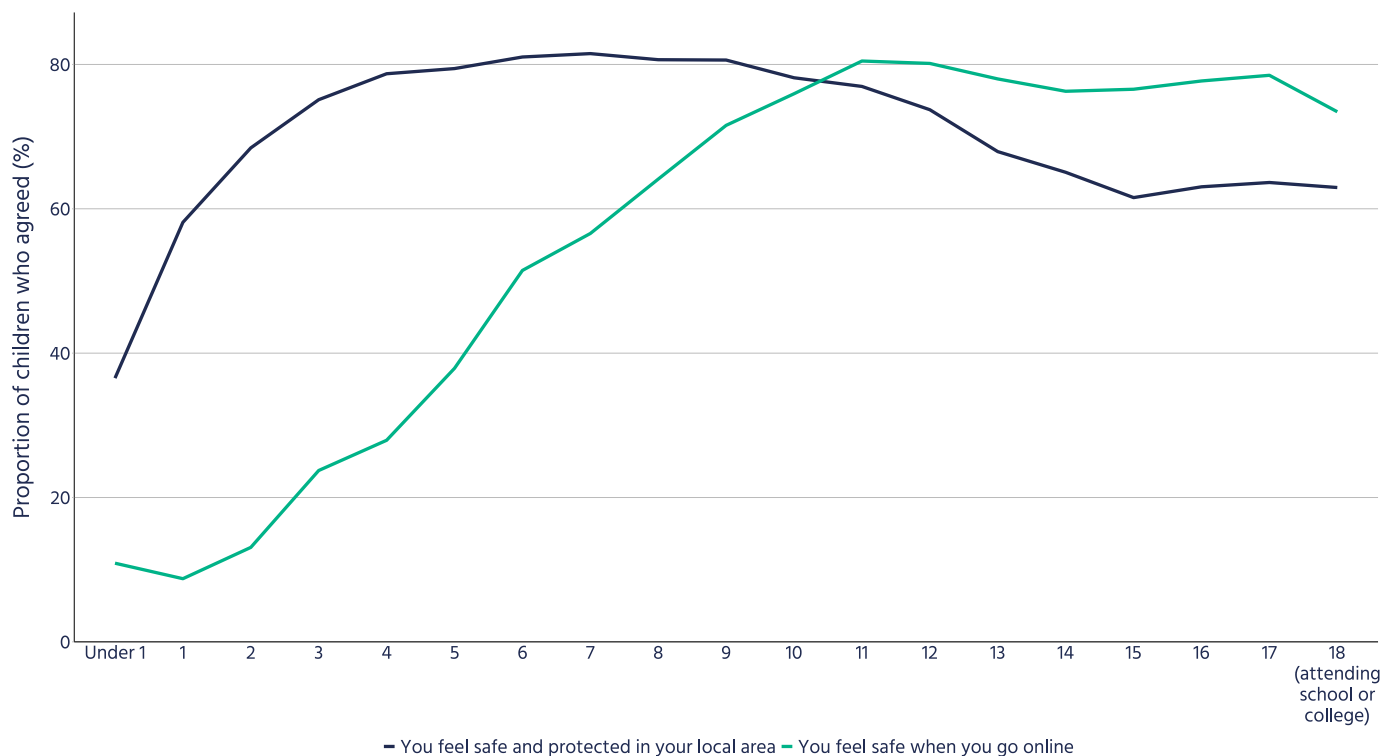
The number of children reporting that they felt safe online stabilised and plateaued from the age of 11, remaining stable between 80% and 76% between the ages of 11 and 17. Children's entry into secondary school, and the increased presence of media literacy in the school curriculum, might be an explanation for this. Further research into this area would be helpful to understand what contributes to children's feelings of safety by age.

The Children's Commissioner's office's 2022 *Digital childhoods: a survey of children and parents* found that the minimum age for most of the big social media platforms is 13, with the exception of WhatsApp which has a minimum age of 16. Despite these minimum age limits, that report found that a substantial proportion of child users aged eight to 17 that were on these sites were underage. 50% of the users aged eight to 17 on YouTube were underage; on TikTok the proportion was 44%; and on Snapchat it was 41%⁴. Figure 1 shows how safe children feel either side of this age limit.

1.2. Older children feel safer online than they do offline

“We should ALL be able to feel safe online and locally where we live” – Girl, 11.

Figure 2: Percentage of children agreeing they feel safe and protected in their local area and percentage agreeing they feel safe when they go online, by age



Younger children are more likely to agree that they feel safe in their offline environments than they were to agree that they felt safe in their offline environment (Figure 2). The age at which this trend changes, where children are more likely to agree that they feel safe online than they were offline is 11. At age 11, 80% agree they feel safe online, and 77% agree they feel safe offline.

Some younger children highlighted that there was a lack of access to safe offline activities and spaces for them to be children.

“The government should talk about how to stay safe online and outside of school.” – Girl, 10.

“The government should be more aware of children who aren’t safe in their local area or online, and be aware of those who don’t get treated fairly” – Boy, 12

1.3. Feeling safe online is linked with other areas of a child’s life

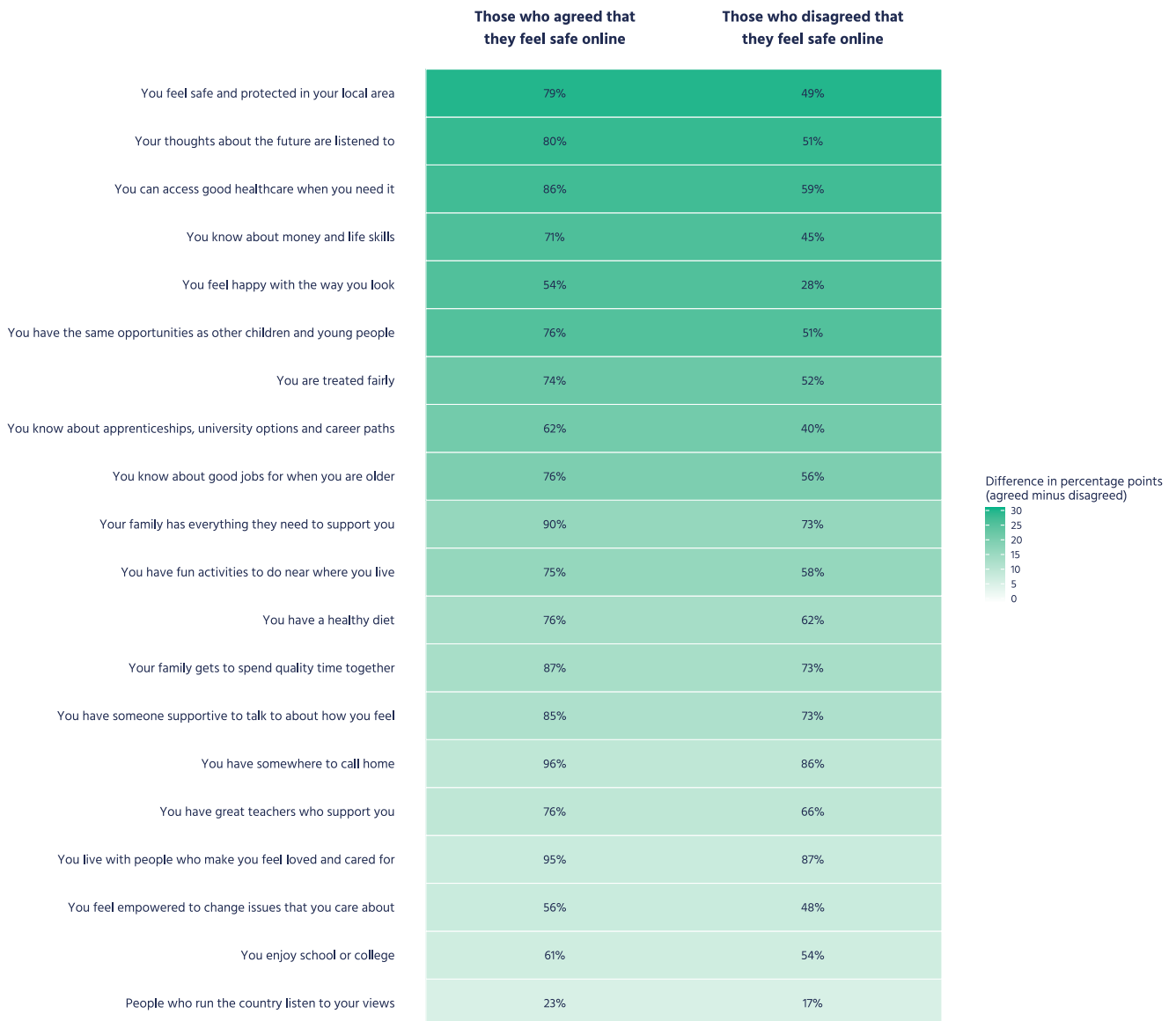
“The digital age has gone horrendous and will only get worse, we need a safer environment online which starts at home” – Boy, 11.

The Big Ambition surveyed children and young people on a range of areas of their lives, including how they felt about their education and their access to services and support. The heatmap below sets out children’s agreement rate with statements from these other survey questions, and the statement that children feel safe online. Our research has found that children feeling safe online is linked with children feeling good about other areas of their lives.

The total percentage of children who disagreed with the statement “you feel safe when you go online” was 9%, whereas 71% agreed with the statement. This means that the variances set out below are impacting a smaller number of children but the link is stark.

The associations between feeling safe online and agreeing with other statements in the survey about the quality of a child’s life are shown in Figure 3. Children who disagreed they felt safe online were also less likely to agree with other statements from survey questions in *The Big Ambition*. For example, 79% of children who felt safe online also felt safe in their local area, but less than half of children who felt unsafe online felt safe in their local area.

Figure 3: Heatmap of percentage agreement with statements in *The Big Ambition* by agreement with the statement “you feel safe when you go online”



- **Children who disagreed that they felt safe online were more likely to respond negatively to every question in *The Big Ambition* than children who agreed that they felt safe online.**
- **Children who disagreed that they felt safe online were less likely to report feeling safe and protected in their local area.** 49% of children who disagreed that they felt safe online agreed

that they felt safe and protected in their local area, this compares to 79% of those who agreed they felt safe online who also felt safe in their local area.

- **Children who disagreed that they felt safe online responded second-most negatively to the statement “you feel happy with the way you look”.** Only 28% of children who disagreed they felt safe online agreed with this statement. For comparison, 54% of children who agreed they felt safe online also agreed that they felt happy with the way they looked.
- **Children who disagreed that they felt safe online were less likely to agree that they had the same opportunities as other children and young people.** 51% of those who disagreed they felt safe online agreed that they had the same opportunities as other children, compared with 76% of those who did agree they felt safe online.
- **Children who disagreed that they felt safe online were less likely to agree that they were treated fairly** (52%), compared to 74% who did agree.
- **Children who disagreed they felt safe online were less likely to agree that they felt empowered to change issues they care about.** 56% of children who felt safe online also agreed that they felt empowered to change issues they care about, but only 48% of those who did not feel safe online agreed with this statement. Additionally, only 17% of children who felt unsafe online agreed that the felt decision makers listened to them.

2. What children said was causing them harm online

The following section analyses the responses to the free text question in *The Big Ambition* where responses mentioned online harms, alongside the insights provided by the Children's Commissioner's office's Young Ambassadors during a roundtable discussion held on online safety in July 2024.

Responses to *The Big Ambition* show that children see harms both as specific types of harmful content and in terms of service design. *The Big Ambition* results show that children were impacted by online harms in three respects: content harm between users, content harm that affected themselves as a user, and harms that were not content specific.

Exposure to harmful content types – such as those provided for on the face of the Online Safety Act 2023 – has a role in the occurrence of harm. However, children told the office that other aspects of the online world, such as certain design features like image filters and architecture of the online ecosystem which allows content to be shared across multiple platforms, both contribute to the harm caused by content, and has the capacity to cause harm in isolation of any specific content type.

2.1. On the face of the Act: harmful and illegal content

In addition to their duties on illegal content⁵, the Online Safety Act obliges online service providers to take steps to protect children from harmful content⁶. A suite of harmful content types is included on the face of the Act, including pornographic content, content that promotes, encourages or provides instructions for suicide, self-harm or eating disorders, content depicting or encouraging serious violence or bullying content⁷.

Some of these content types were prominent in children's responses to *The Big Ambition* survey. The following section presents analysis of those responses.

2.1.1. Child Sexual Abuse Material

The prevalence of child online sexual abuse – in particular that of sexual predators and groomers – was a key concern for respondents to *The Big Ambition*.

"My friends and me have all experienced personally, bullying and/or online bullying/grooming/etc." – Girl, 15.

"Online grooming and impersonation is too common still so make it SAFE" – Boy, 12.

"They should put more regulations or requirement onto social media platforms so less young people are exposed and valuable to predators. This can also increase the safety of young people on the platforms." – Girl, 16.

Self-generated child sexual abuse material was a further issue that respondents raised. Some respondents considered education to be the solution to this issue.

"The government should put more safety into online security such as putting a further emphasis on the importance of not sending explicit photos online and putting a higher penalty on those who go in to share those photos with other people after having been sent them." – Girl, 15.

Another respondent, on behalf of a 6 year old boy, shared the same view that the government should *"insert on the curriculum at school's information about the dangers of social media, sending photos of themselves to other people."* The concern of this adult, on behalf of such a young child, reflects the fact that the risks of the online world affect children above and below the age of digital consent, and that many adults are concerned about what children's online lives will look like in the future.

The prevalence of Child Sexual Abuse Material, rather than the number of times children themselves come across that material, contributes to children's feeling that they are not safe online. Threat alone should therefore be recognised as harmful.

2.1.2. Pornographic content

A number of respondents to *The Big Ambition* cited the scale of online sexual abuse and exposure to sexualised content and the impact it has on children.

Some children were concerned about the exposure to highly sexualised content.

“Stop boys from thinking all girls and women are for is to have sex with or abuse. They say stuff and touch us every day and NOTHING gets done about it. they always get away with it and that makes them worse. They talk about porn all the time and watch it all the time, play it on their phones.” – Girl, 14.

“Social media should be better regulated and stop us being exposed to sex, violence, weight loss etc.” – Girl, 17.

Some respondents specifically highlighted their exposure to pornography as harmful. Respondents citing pornography often mentioned the need for more restrictions to prevent children accessing porn.

“Things like porn should be banned or massively limited in some way. It's bad enough that adults watch it, but now children are being exposed to the harmful culture. As most porn videos include at least one act of violence towards women in some way which negatively impacts the way young children, especially boys, will see girls and women.” – Girl, 16.

“Online safety is non-existent and parents are so ill-informed and don't put restrictions in place (across the class spectrum) so I have friends who have seen porn, fighting and other inappropriate content and they are only 10/11 years old or younger. It feels like there is nothing in place to help.” – Girl, 12.

Other technologies appear to be increasing the exposure of children to pornographic content. In the roundtable held in July 2024, a young person explained that that they were exposed to pornographic imagery through the manipulation of an otherwise neutral image to circumvent an online service's content moderation filters.

“It was an image of a politician ... and then that image was made up of a whole bunch of small images of genitalia. And then, because TikTok has a feature where you can zoom in, like obviously it was like pornographic content, but because TikTok's algorithms and stuff only saw the picture of (the politician) overall and not the picture when you zoomed in” – Boy, 17.

The proliferation of deepfakes and AI tools were also discussed in this roundtable and emerging technologies remain a cause for concern regarding the exposure of children to inappropriate content. Greater detail on the impact of these technologies on children is discussed further below.

2.1.3. Suicide, self-harm, and eating disorder content

Content that depicts, promotes or glamourises suicide, self-harm and eating disorders is a further category of content that children highlighted as concerning. It has been included in this section to provide for the harm that might occur to the person when they are exposed to it.

“More online protection, TikTok (and all socials) is destroying our minds and morals at a very young age, alongside exposing young eyes to highly inappropriate sexual, suicidal, violent, traumatising content that then becomes normalised.” – Girl, 17.

One child highlighted that information on how to buy provisions to carry out a suicide was accessible to children. The child asked for help *“getting rid of substances on the internet for young people that can be easily be ordered e.g. a liquid or food that can kill for children with suicidal thoughts and minds but people that need certain medicines should have a certain reason clarified on the website that will be private to other people on the website except the creator. So they know if it is for a medical condition or overdosing e.g. caused by thoughts of death” – Girl, 12.*

2.1.4. Abusive content and bullying

In response to *The Big Ambition*, children told the office about their experiences of being bullied online. Children and young people told the office that bullying online had become more prominent and more complex. Often, respondents mentioned multiple different types of harm and in some cases, they explained the interrelationship between online and offline bullying. Several respondents mentioned the impact online bullying had on their mental health and wellbeing.

Respondents to *The Big Ambition* told the office that online bullying was common.

“My friends and me have all experienced personally, bullying and/or online bullying/grooming/etc.” – Girl, 15.

"Reduce how normalised bullying and discrimination has become especially online." – Girl, 17.

"They should make online bullying illegal or something because it's really a big problem." – Girl, 11.

"Online bullying is made so much easier through the use of mobile phones and social media." – Adult on behalf of girl, 12.

Respondents also told the office about the different ways children might be bullied online. This included being trolled and receiving unsolicited messages. Some children also specified that bullying happened to them on online gaming sites.

"The government should monitor kids' online games to stop bullying." – Girl, 12.

"They need to help with keeping them safer online so they don't get cyber bullied by strangers" – Boy, 12.

"Make the online community safer, my daughter doesn't yet use social media but it scares me knowing what social media consists of and the trolls/online bullying that is online." – Adult on behalf of girl, 4.

Children and adults stated that bullying often happened both online and offline. In some instances, they detailed experiences where bullying in the real world had been exacerbated online.

"To listen to all voices around and to manage and control any bullying around on the internet as it could be sometimes people are videoed in a fight on social media." – Girl, 15.

"In recent years more bullying is taking place online as well as face to face it's becoming unavoidable making young people make adverse choices in life." – Adult on behalf of girl, 4.

"To make kids' lives better, the Government should be supporting us with better education, being safe online and raising the concerns of bullying and harassment. This is because nowadays kids are getting bullied physically and mentally, online or offline, and it's affecting this generation." – Girl, 13.

Some children also said that bullying online could have an impact on them in the real world, particularly at school. Respondents said that bullying online was sometimes less obvious and more difficult to tackle.

"I do not think that adults and the Government truly understand what school can be like for students. It can be a horrible experience for those that are considered the 'quiet kids' and 'unpopular'. Bullying is so prevalent schools, particularly secondary, and is not noticed as much as it used to be because it is much more subtle and can take place online." – Girl, 16.

"Have it so that bullying is NOT permitted in any school or online at all and as a victim of bullying it feels really horrible to it not be stopped and I know that every school says 'we are very fortunate to have no bullying in our school' but as a victim at both primary school and secondary school I know how untrue that is and to have those exact words from teachers that have been highly involved in the bullying and making me feel horrible. It should be stopped immediately and if you are a person who is bullied and you don't have the guts to tell anyone or speak up then it is a really upsetting so although it may seem like I'm just talking about MY schools I feel the government should have severe punishments for any bullying online or in person" – Girl, 11.

"Add more information in school curriculum about how to stop bullying in school and even cyberbullying" – Girl, 12.

In the roundtable held in July 2024, one young person told the office that they were coming up with their own solutions to address bullying online, as they did not believe there was enough support on platforms to help them. This boy explained how children could potentially reduce the cross-platform risk of cyberbullying:

"If someone is bullying you on a certain platform and you don't have the same usernames on another platform, you know it is going to be harder for them to find you." – Boy, 17.

The additional risk of harm from cross-platform content sharing is discussed later in this report.

2.1.5. Hate content

A lot of responses to *The Big Ambition* mentioned the impact of hate content online. Respondents focused on harmful comments and messages used to spread prejudice or to directly threaten children and young people online. A lot of the comments talked about personal attacks people received online. Incitement to hatred is a criminal offence, though the extent to which children are affected is unknown, and the Home Office does not break down its hate crimes statistics by age⁸.

Two key themes that came through in *The Big Ambition* responses was the prevalence of hate content which targets race and sex. While the office recognises that hate content can affect other cohorts, the below sections focus on the themes that were common in *The Big Ambition*.

Racism and swear words

Young people mentioned their experience of saying inappropriate language such as racism and swear words either through comments, messages or posts online.

“People shouldn't be allowed to post inappropriate things online (racist messages and swear words).” – Girl, 10.

“[The government] should make the internet more safe as YouTube is now swearing and saying inappropriate stuff” – Boy, 9.

“Make racism on social media and real life illegal.” – Boy, 12.

Sexism

Young girls in particular talked about the prevalence of sexist or misogynistic content online spread by other young people. Some provided solutions to this problem, including more education.

“More should be done to educate children about respecting other people, particularly women. I use social media every day and I see a lot of misogynistic comments left by people my age. There are also racist and insensitive comments mocking people about their experiences and trauma.” – Girl, 16.

“A very important topic to improve children's lives and wellbeing is to take seriously the disgusting increase in online misogynistic hate towards girls. It harms boys too.” – Adult on behalf of child, 8.

“The government should enforce stricter measures on social media. Social media allows young children to begin to have unfair standards for themselves for things such as appearance. Also, with the rise of more discriminatory content (more specifically sexism) on platforms like TikTok, schools need to implement into growing minds why such antisocial behaviour like this is incorrect.” – Girl, 14.

“Stop children going on dodgy social media. Also stop sexism” – Girl, 12.

Commenting on the prevalence of sexism and misogyny, some respondents called for specific measures to be introduced to make the online world safer.

"More guidance in school for online safety. All this incel/Andrew Tate thing is really worrying. The influence these people have is unmonitored, unfiltered. Literally coming straight to the kids. You could get things in place for Covid so why not for other risks, online grooming, violence, racist and homophobic/transphobic pornographic content. The internet is wild, you can protect your kids only up to a point of when they have a friend/associate who doesn't have restrictions." – Adult on behalf of boy, 12.

"Also, with the rise of more discriminatory content (more specifically sexism) on platforms like TikTok, schools need to implement into growing minds why such antisocial behaviour like this is incorrect." – Girl, 14

In a roundtable held in July 2024, an 18-year-old young woman explained that she thinks *"it's got to the point of epidemic levels of misogyny, especially in schools"* as a result of exposure to misogynistic online hate. She explained that she thought *"they need to create a new category about violence against women and misogyny and sexism"*, and explained that there should be *"dedicated lessons on misogyny and sexism and how we tackle this"*.

The Children's Commissioner's Office recognises that hateful content also affects other groups of children and young people with protected characteristics, a topic which merits future research.

Children's understanding of hate content

Some responses suggested children were not in a position to understand the hate content they see online.

"Government should be doing more to regulate and control social media and the impact this has on children. Parents can do what they can to restrict and limit time spent on social media, and to educate themselves about the things that children access. I am worried though about the lack of scrutiny and control about content, which exposes children to messages about life that they don't have the skills to filter (misogyny and racism stand out). I think that work needs to happen at a higher level of legislation and controls with the big social media companies." – Adult on behalf of boy, 12.

“We can have some more safety mode on the internet because you get lots of people who be very rude and mean and try to ask questions about you or hack you and I get very worried and scared when people like that are on the internet or are being mean or ask questions. Like I have had people that I don’t know swear at me we I have done nothing. So I think that needs to be improved. Thank you” – Boy, 10.

2.1.3 Violent content

When discussing the prominence of violent content online during the roundtable discussion held in July 2024, young people set out how violent content, which is often prohibited on some larger social media platforms, nonetheless finds its way onto their feeds. Users are finding creative ways to create violent content which would circumvent some content filters put in place to prevent it from being viewed.

“You have a lot of violent content that is on the social media platforms, but to hide it from the algorithm the first like couple of seconds or 10 seconds of the video, the video is like a completely different video that’s used to entice young children to continue to watch the rest of the video and that is harmful”. – Young woman, 18.

“5 second, 10 seconds of an interesting video like catch on with attention and then it’s just the worst thing you could ever see” – Boy, 17.

2.1.6. A note on cross-platform harms

The capacity for the types of harmful content described above to be shared across multiple service platforms was cited by young people as a factor which intensified negative experiences online.

Young people told the office, through both *The Big Ambition* and in the subsequent roundtables, that features on apps which allow posts to be shared to different platforms have made the proliferation of harmful content more rapid and has also made it harder for young people to get harmful content removed.

Children explained that sharing content across multiple platforms increases the likelihood of a child coming into contact with a piece of content. In the roundtable, one boy explained that *“what can be the most harmful is the fact that, you know, TikTok, Instagram reels, YouTube shorts and Snapchat spotlight are now literally the same thing like someone will post one piece of content with TikTok and*

then you'll see it appear on Snapchat, Snapchat Spotlight and YouTube shorts and Instagram reels. So it's like a mirror of all these platforms" – Boy, 17.

The roundtable discussion also pointed to the decentralised architecture of the online world, where companies *"all have different policies and enforcement policies"*, which results in children needing to navigate a series of different features and reporting mechanisms: *"You have all different algorithms on each app. It's not just one step algorithm"* – Boy, 17.

This means that when a child reports a piece of content on one platform, any action that is taken on that platform against that piece of content is not shared across all social media platforms, despite the ability for content to be shared across those platforms.

Adults were also concerned about the impact of cross-platform harms on children: *"Greater control over content is needed to prevent children from accessing inappropriate material or copying inappropriate behaviours which are regularly uploaded on to different platforms."* – Adult on behalf of girl, 9.

Children identified specific design features which facilitated the instance of cross-platform harms. One explained that some content can be synced to post to multiple platforms at the same time, for example on Facebook and Instagram. *"I think like a lot of users on Instagram or Facebook do that so they don't have to continuously post on different social media platforms."* – Young woman, 18.

2.1.7. A note on gaming sites

Alongside the harms children experienced on social media platforms, respondents also mentioned those they encountered on gaming platforms, and some expressed concern that the content children came across in games was not age appropriate. User-to-user gaming sites, such as Minecraft or Roblox, are treated in the same way as other user-to-user online platforms – this means that the same rules about reducing children's access to harmful content applies. Respondents to *The Big Ambition* wanted online safety protections everywhere they were online – including gaming platforms.

"That making online games even more safe for children to play." – Boy, 9.

"I think that online games should be safer and maybe like get security so no one breaks in" – Girl, 9.

“There is also a huge issue with the content of video games. The horror stories about inappropriate content on Roblox is well known.” – Adult on behalf of boy, 15.

Respondents also highlighted that gaming sites, as platforms that enable user-to-user contact, were sometimes misused by people who intend to harm children.

“More safety awareness about online gaming chat rooms, stranger danger, ban social media for child that’s what will ruin children in the future.” – Adult on behalf of girl, 6.

“Improve online safety for children with any app or game that allows chat.” – Adult on behalf of girl, 7

One respondent said that parents had started to restrict access to gaming sites. While this could help to protect children from harmful content, it had the unintended effect of making them feel socially isolated.

“Make online games somehow more safe so people who feel left out on games they can’t play. For example Roblox some people can’t play it because of the dangers it can cause.” – Girl, 10.

2.2. Beyond the face of the Act: harmful content

The Online Safety Act gave detailed categories of some type of harmful content, which were listed on the face of the Act. In addition to the two priority content types set out on the face of the Act, there was a third category: Non-Designated Content, which the legislation provided Ofcom with the flexibility to define⁹. This section covers the additional types of harmful content identified in *The Big Ambition* responses. Currently, these types of harms are not classified as Non-Designated Content, but the Children’s Commissioner’s Office recommends that they should be considered as a Non-Designated harmful content type.

These content types are more difficult to categorise because the occurrence of harm impact differs from person to person, or because the experience of harm is based on cumulative exposure to content. Children wanted to talk about the impact this type of harmful content had on them, and the Children’s Commissioner’s Office urges action on these issues.

2.2.1. Content that risks children's perception of their bodies

The Online Safety Act lists content that encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder as a type of harmful content. However, the Children's Commissioner considers content that warps children's perception of their bodies to be as equally harmful, and warrants consideration as Non-Designated harmful content.

In responses to *The Big Ambition*, young people and adults talked about the unrealistic expectations children faced from seeing filtered reality online, this was a particular problem in relation to body image content.

"The government should enforce stricter measures on social media. Social media allows young children to begin to have unfair standards for themselves for things such as appearance." – Girl, 14.

"The amount of pressure on young people is fairly extreme, especially as the "online" world sort of means there is no let-up, kids are expected to look/perform/act in a certain way," – Adult on behalf of child, 17.

"They need to make the online world a safer place for young children, particularly for young girls who have an unrealistic view of how they should look." – Adult on behalf of girl, 9.

When discussing how content on social media platforms impacted children in the roundtable held in July 2024, young people made it clear that in their experience it was not the content itself that was the harmful element, but how it was produced. Image filters – tools that are built into some of the biggest social media platforms – were described as having a major impact on young people.

"I think something that is overlooked by the Online Safety Act is filters" – Boy, 17.

"We're always focusing on like, oh, this content can be harmful. This content can promote body image and, you know, eating disorders. But the things that facilitate that are the filters its users are putting on" – Boy, 17.

"I think social media has this great like outlet to be able to like be body positive and inclusive. But then we're all just using filters and it's counterproductive" – Young woman, 18.

The young people explained how prominent these image filtering tools were online. One young person explained that a setting exists that allows users to apply a filter to their accounts as a default. She told the office that she would have to consciously switch it off to produce unfiltered images.

“On TikTok, sometimes when you take a video, you’ve automatically got the beauty filter on ... so automatic beauty filter on ... It’s saying, you are taking a video you want to look your best, you should use a filter. So I think that should definitely be scrapped” – Young woman, 18.

This is having an impact on children’s mental health, according to the young people taking part in the discussion:

“I think especially on Snapchat, for example, you’ve got these really hyper realistic filters and they always gravitate towards like a certain standard” – Young woman, 18.

“Snapchat dysmorphia. Like it’s a literal medical phenomenon of people getting plastic surgery to look like their snapchat filter” – Boy, 17.

Finally, these filtered images appear to be exacerbating other harmful aspects of the online world. Young people explained that they felt filtered images enforced existing harmful stereotypes, the example given of women and girls.

“I think it is leading to an increase in sexism because then under certain videos where women aren’t using filters, you see men leaving really sexist comments” – Young woman, 18.

Another harmful aspect of the online world exacerbated by images was the insecure information environment. Children felt that they were being misled by image filters:

“Videos with women who are like having ads for beauty companies saying, oh, you can achieve this. Look if you buy these products, but it’s they’re wearing the products, but they also have a filter on top.” – Young woman, 18.

“I think that the government could do more to protect children on the internet from harmful, misleading content. On apps such as TikTok and YouTube you can find plenty of videos showing a fake sense of reality, which can really harm children’s mental health, the government should do more to protect kids from this content.” – Girl, 13.

2.2.2. The role of social media users: influencers

Respondents to *The Big Ambition* highlighted that the behaviour of other users across a wide range of online platforms impacted their online experiences. Where social media influencers can be a source of knowledge and inspiration, there are some whose behaviour made children feel misled and sometimes unsafe, or lead to a general negative effect on their mental health. While influencers can have a role in children's perceptions of their bodies, they impact other aspects of children's lives too.

"I also think Tik Tok and Instagram age limits should be higher as there are too many influencers who push a fake lifestyle or bad examples. Verification age ID should be necessary to open the app .. like passports etc." – Boy, 14

"The Government needs to do more about protecting children from the harmful effects of social media and its so-called influencers as it's having a massive impact on children's mental health and is responsible for triggering eating disorders in thousands of vulnerable teens ... all over social media there are influencers encouraging restrictive eating and one meal a day etc. Why do the government focus always on obesity putting calories on menus what about the poor people with anorexia." – Adult on behalf of girl, 15.

The Children's Commissioner's Office has monitored the concerning rise of young people with eating disorders and has previously noted that tackling some of the potential drivers of disordered eating is key to addressing it¹⁰. The evidence above makes the case to include action on social media as a priority – and that need not be limited to the definition of eating disorder content named on the face of the Online Safety Act, but the broader suite of content types that can have this harmful effect on children.

2.2.3. Misinformation

There are some provisions in the Act for misinformation. According to the Online Safety Act, Category 1 services will be required to follow their own terms and conditions, so will be required to take action on misinformation if it reaches the threshold set out in their own policies¹¹. Also, Ofcom is required to establish and maintain an advisory committee on misinformation and disinformation. They also have a responsibility on media literacy under the Communications Act 2003¹². However, stakeholders within the

online safety sector have expressed concern that these provisions are limited and hinge on the inclusion of misinformation in technology companies' own terms and conditions¹³.

Research from Ofcom finds that, when online, children in the UK often struggle to distinguish between what is real and what is not: young people aged 16 and 17 are also less sure about their ability to distinguish between real and fake news 2023 than they were in 2022 (75%, down from 82%). This matters because some of the responses to *the Big Ambition* indicate that despite the importance of the online world as a source of information, children are having experiences which mean they do not feel they can trust their online environment.

Some children indicated in *The Big Ambition* and the roundtable that they had had experiences of false or misleading information online which had harmed them. These points were made with a direction from children that action should be taken against it.

"Ban every scammer or any one who can talk to them without their permission" – Child, 9.

"I can report it and I can say all this is a, this is a deepfake. This is someone impersonating another person, but it takes so long for the process to actually, you know amount to something." – Young woman, 18.

The above indicates that the existing mitigation measures to tackle misinformation are not having a real life impact on children's experiences.

Parents and carers also demanded action against children's exposure to misinformation online when they responded to *The Big Ambition*.

"Internet safety should be a priority and the spread of misinformation is concerning as it can have such an impact on children. They aren't old enough to critically assess if the information is genuine/ correct. More needs to be done to ban / block these sites when they're reported." – Adult on behalf of boy, 6.

"Do more to make the internet safer - scams and misinformation" – Adult on behalf of girl, 10.

2.3. Non-content harms

Alongside the harms that children are exposed to as a result of exposure to specific types of harmful online content, children also explained that some harms result from the function of design features built into online platforms. In their responses to *The Big Ambition*, children referenced being fed content by online systems, such as recommender algorithms, that they did not want to see. Other elements of platform architecture contributed to children having less choice over their online experiences. This section explores those features.

2.3.1. Algorithmic harm

In their responses, children highlighted the harms of a number of the design features of certain online platforms, including search algorithms and recommender systems.

Some children highlighted that algorithms often exposed children to harmful content when they were not necessarily seeking it out.

“You search for something innocent online, the results you receive are not always what you were hoping to see” – Girl, 11.

“There should be more shielding in place on social media apps, as children are feeling unsafe through seeing things that either aren’t suitable but come up because it’s ‘recommended’.” – Girl, 13.

“I really, really dislike [algorithms] because you can have echo Chambers where only your views are reinforced, where you can see white supremacist content where you can see just crazy things and think that you are right without really seeing anything beyond that. And I think there was a whole controversy about, like, Instagram changing their feed to algorithmic instead of chronological.” – Boy, 17.

As well as algorithms standing to put children at risk, children also shared concerns about the algorithms that were meant to keep them safe. It would appear from some children’s responses that algorithms that screen content on some social media platforms are falling short of their objective.

“You have a lot of violent content that is on the social media platforms, but to hide it from the algorithm the first like couple of seconds or 10 seconds of the video, the video is like a completely

different video that's used to entice young children to continue to watch the rest of the video and that is harmful" – Boy, 17.

"I think the users know that Instagram will detect a certain few seconds on the reel so users then either put on like an interesting video or something to like get people to watch which could be kids." – Young woman, 18.

2.3.2. The development of addictive behaviours

Some respondents raised concerns that certain factors gave rise to addictive behaviours in children and young people. When setting out those concerns, children gave instructions to decision-makers directing them to take action against specific types of online activity.

"Don't let people under a certain age play on computers or other technology because it can be addictive stopping people from doing other activities which they might enjoy" – Boy, 12.

"Stop online games where you can play with others because young children will get addicted to games that are not for their age (get influenced and start swearing and being rude just like they do online)." – Girl, 11.

"Help reduce screen addiction in young children" – Girl, 16.

3. Children's views on who is responsible for keeping them safe online

In response to *The Big Ambition* young people gave their views on the balance of responsibility between tech companies, regulators, the government, parents, schools, and themselves. Young people accepted that there was an important role for all actors to play in keeping them safe.

3.1. The role of tech companies

A common theme in *The Big Ambition* was respondents' desire to see action from tech companies to keep children safe on their platforms.

"I think the government should also keep holding social media companies to account regarding online safety." – Adult on behalf of boy, 17.

"As I parent I think online safety could be better and more ownership on big IT companies to make the internet a safer place." – Adult on behalf of girl, 13.

"Government needs to hold social media and online companies to account more for hate messages and targeted propaganda for children." – Adult on behalf of child, 16.

"Online safety is not prioritised enough, the Online Safety Bill is a great start but the platforms need to take more responsibility." – Adult on behalf of boy, 13.

"A simple thing the government could do is to hold online service providers to account (e.g. Meta) to ensure that platforms are safe for children to play on and to ensure there is a clause to break end-to-end encryption if adults are suspected of sharing materials related to child abuse." – Adult on behalf of boy, 9.

"Make phone companies etc accountable for not protecting children and give incentives to companies to protect children." – Adult on behalf of boy, 9.

Young people wanted to see tech companies put protections for children ahead of their profit margins.

“You need to set your monetary interest aside and prioritise the people and young people who have been affected.” – Young woman, 18.

In the roundtable discussion held in July 2024, young people expressed frustration with the insufficiency of existing measures some online platforms had put in place to keep them safe. They gave examples of some flaws in the reporting and content warning functions which many online services point to as integral parts of their arsenal against harmful content.

“You have all these kind of bots, like sex bots. You know, with really compromising profile pictures and there are thousands of them. There’s no way you could possibly just, oh, like report the fact that even to report one and to have one account taken down is almost impossible. How can we take down these masses of like sex bot content that, you know, the platform could easily prevent if they had minimal safeguards for their users?” – Boy, 17.

“It would be nice if there was, like, a centralized way of doing it. Like maybe if there was a button like report to Ofcom and then, you know it is gonna go to the right people, but because it is their own social media platforms that are monitoring it, they can do whatever they want.” – Boy, 17.

“I don’t know why it’s still up and it comes up and says this content can be harmful ... I don’t know why it’s still up if they know it is harmful” – Boy, 17.

3.2. The role of government

The role of government featured prominently in responses to *The Big Ambition* survey, and different functions of government were alluded to – for example, some changes children asked for would sit with Ofcom, others with central government. Children wanted to raise specific online harms as priorities:

“To make kids lives better, the Government should be supporting us with better education, being safe online and raising the concerns of bullying and harassment. This is because nowadays kids are getting bullied physically and mentally, online or offline, and it's affecting this generation. Some kids don't attend a school or education so I think that should be made aware. Some kids don't have the same opportunities as others because of their lack of education.” – Girl, 13.

“That the government should try harder in preventing drugs and gangs because people feel very unsafe and uncomfortable. Also I think that the government need to think about safeguarding online.” – Girl, 14.

Some respondents advocated for more restrictions:

“The government should get more involved in keeping children away from online / gaming and social media platforms that brain wash the kids from living long, happy, stress and worry free lives.” – Boy, 10.

“The Government should have more restrictions on online apps. For example, Discord is allowed from the age of 13 when you can talk to anyone, but whatsapp is only allowed at 16, but you can only talk to the people who have your number.” – Girl, 14.

Some children wanted to highlight some positive action the government could take to use technology itself to keep children safe online.

“The government should allow phones to be used in schools, of course with supervision and monitoring (to prevent any misuse and cyber bullying), but phones can help children's education in more fun and interactive ways, such as with online games (like kahoot). Phones also let children to research things when needed in classes (with teacher permission) to help them reach their full potential when learning. thank you :)” – Child, 13.

“That children should be able to have a nice, safe environment where they are like online. For example, the government can make an safe online chat which is free for schools where you can create chats and play games safely with your friends. I also think that they should have more rules around smoking because lots of young children see people smoking and may think that they want to try it so I think they should raise the limits of smoking to an older age.” – Boy, 10.

“The Government should put up more places for children to play or something to do when they are bored. Maybe around the big malls there should be a crafting stool so everyone can have an opportunity to craft instead of playing online games. In my opinion, the Government should decrease the prices of toys so parents pay less (which will make the parents happy) and the children get what they want (which will make them happy).” – Girl, 10.

Some children said the government could help them by listening to them:

“That there could be better safety online!! The government listen to our views and act upon them”
– Girl, 10.

“I think that the government should put more effort into letting students' voices be heard, and let us share the issues we feel are important and why. ... the internet needs more precautions for young people, definitely. I'm not sure what this could be, but possibly people online that manage what's happening on social media and make sure everybody's safe. I also think we should be more educated about internet safety in schools.” – Girl, 13.

3.3. The role of schools

The quality of the education children received about the online world was a prominent theme in the responses to *The Big Ambition*. Some children simply requested more general education about the online world, which calls into question how useful or impactful the current provisions on this topic are:

“Make social media safer, education about its dangers” – Girl, 15.

“Make online safety a vital thing children learn about in their years running up to being able to legally own a phone.” – Girl, 16.

One child indicated that they didn't consider the education they currently received in school as useful or relevant:

"Most of my friends just laugh it off and it's like, oh, these teachers don't know what they're talking about" – Boy, 17.

Other respondents asked for certain topics to be taught on the curriculum:

"We need guidance on digital literacy and online safety to navigate the internet responsibly." – Girl, 13.

"Teach in schools that social media is painting a false and unrealistic version of life. Educate children about how phones are addictive." – Adult on behalf of girl, 4.

One adult respondent requested more information they could use to support children to be safe online:

"Safer internet education is needed. Parents and schools need to be given more guidance on this problem and what issues to be aware of and how to report them." – Adult on behalf of girl, 10.

Some respondents also highlighted the importance of educating teachers about online safety.

"More support for teachers to look at mental health and healthy ways of living with social media etc for young people. i.e. teaching them not to be reliant and dependent and believe everything online" – Adult on behalf of boy, 5.

"They need to train parents and teachers in all matters technology and how to raise and educate children and students in the digital age." – Boy, 16.

Online safety is covered in three areas of the national curriculum: in relationships and health (primary), relationships, sex and health education (secondary), computing, and citizenship education. The guidance promotes teaching on positive relationships online, and on using technology safely, responsibly, respectfully and securely¹⁴. The Children's Commissioner has previously highlighted that the online world is often the place children turn to for answers if they feel their education in these areas is lacking¹⁵.

The curriculum on online safety is currently under review. The last government ran a consultation on their Relationships, Health, and Sex Education (RHSE) curriculum. Its proposals included delaying certain modules of RSHE including teaching about online harms. It recommended not teaching about some areas of the online world, for example online gaming sites, or known risks such as deepfake images, until Year 4 (age 8-9)¹⁶. However, this report shows that children who are younger than this are experiencing

harm online, and with access to the online world children are likely to be exposed to those very topics regardless. The Commissioner's Office recommends that the government revises its proposals to ensure that children of all ages can learn about the harms online in an age appropriate way.

3.4. The role of parents

While some respondents recognised the important role for parents in helping children navigate the online world, there were mixed opinions around the effectiveness of a solution that relied solely on parents to use their judgement.

"Parents can do what they can to restrict and limit time spent on social media, and to educate themselves about the things that children access." – Adult on behalf of boy, 12.

"Children need to be made aware of online threats at an early age (bullying/pacts/trends). I also think parents need to be made aware of online threats!" – Adult on behalf of boy, 5.

Some respondents said that parents needed to be better educated about the harms online.

"Educate pupils the correct path with gaming also, and educate parents of the dangers stemmed from some of these games etc" – Adult on behalf of boy, 10.

"More skills teaching parents online safety / hold events" – Adult on behalf of boy, 10.

However, respondents also noted that parents took inconsistent approaches to online safety. Even when parents had taken a strict approach, this did not necessarily mean that their children would be protected from online harms. Some respondents asked for a more universal solution that did not depend on parental protections.

"Technology and access to the internet is scary for parents and I think tighter control of what teens are able to view is essential. Despite restrictions when in the home and at school, it is still enormously anxiety provoking knowing your child has access to all kinds of material that could be inappropriate. With friends who have parents with different boundaries, it's hard to manage what your child has access to. I have enormous anxiety over what my teenagers are able to see/access. This NEEDS to be better managed." – Adult on behalf of girl, 14.

"Mobile phones and social media are a concern for parents to keep children safe - if you don't allow your child a smart phone and access to apps they can miss out if their friends are. It would be amazing if smart phones were not legal for children until age 18 so everyone [was] in the same boat and allow children to be children and have access to smart phones when they are mature and able to navigate" – Adult on behalf of boy, 9.

"As a parent, you may restrict your child's access, but another parent may not, and a peer may share such content." – Adult on behalf of girl, 4.

3.5. Concerns about the future of technology

Respondents to *The Big Ambition*, and the young people who took part in the roundtable discussion held on online safety in July 2024, expressed concern about the pace at which technology was evolving. Some highlighted that the safety measures being put in place to manage the risks that come with this advancement were insufficient, and that insufficiency appears to augment the concern about the rapid development.

"Things are evolving, things are changing quickly where by the time everything is enforced new legislation will have to be put into place." - Young woman, 18.

"Put resources into online safety - AI is going to make things harder – the government needs to urgently look into this it is a massive risk for all areas of our communities but especially children" – Adult on behalf of boy, 11.

One respondent specifically expressed concern about the strength of the Online Safety Act and the impact it could have on children's lives.

"At the moment its really just a buzzword for politicians and law-makers to be like we have the Online Safety Act to make children safer. Children don't know about this." – Boy, 17.

3.6. Children's eroding trust

Some responses to *The Big Ambition* betrayed a growing sense of mistrust between children and social media platforms. Children sometimes indicated that they felt they were being taken advantage of by the online platforms they were using.

"The Government should clamp down hard on private corporations that use predatory business tactics, such as social media that allows public misinformation, or sensitive content without precise content descriptors, or services that invade the user's privacy through tracking without explicit consent. This helps protect children from many harmful aspects of the Internet." – Girl, 17.

"Stop apps trying to trick kids to buy things and play the games that you get obsessed with so you spend money" – Adult on behalf of girl, 7.

Some respondents also highlighted their frustration at the lack of action from the government to address the issues children were encountering in the online world.

"Take action to safeguard children on the internet and stop allowing businesses to target them. Parents/guardians have a responsibility to safeguard their children, but the Government have control of laws that govern the internet and websites. The Government need to do more (far more) to protect children and young people online." – Adult on behalf of boy, 16.

4. What a safe online world for children would look like

In *The Big Ambition* report, the Children's Commissioner set out the three ambitions for children's online safety. The over-arching outcome that she wants for every child is that they are safe, healthy, happy, learning and engaged in their community¹⁷.

For this to happen for children's online lives, we need to create a system of online safety which achieves the following ambitions:

- 1) Every child should be able to access the benefits of the online world without needing to put themselves at risk of harm to do so.**
- 2) Every child has the knowledge and support to be safe online. Every child has access to high quality and relevant online safety education.**
- 3) Every child is protected from online harms, and services can effectively safeguard and support them.**

4.1. What needs to change?

The first ambition speaks to the architecture of the online world, the responsibilities that platforms have to create an online world which is safe by design. If achieved, this ambition in and of itself would protect children and ensure that they can take advantage of all the possibilities of being online, without having to suffer the negative consequences. However, children in *The Big Ambition* recognised that society is far off from achieving this ambition.

The following two ambitions are about the protections society needs to create in the interim to ensure that any child that experiences harm has the support in place to recover.

This section details the underlying principles of the ambitions.

4.1.1. Creating platforms which are safe by design

- 1) **Every child should be able to access the benefits of the online world without needing to put themselves at risk of harm to do so.**

"I think children's lives could be better by maybe let us be a bit more free but safe and make all websites friendly for kids" – Girl, 11.

The Commissioner's vision is that every child will enter the online world knowing that they are not solely responsible for keeping themselves safe, and that they are entering a space that is built for them. Every child will have had a say in what that online world looks like. Her vision is for every child to be able to navigate online services in the same way they do school halls: with the knowledge that safeguarding is in place to prevent harm happening to them.

The Children's Commissioner's response to Ofcom's Children's Codes consultation, attached to this report as an annex, sets out how this ambition can be realised using the opportunities presented in the provisions under the Online Safety Act. The regulatory regime must:

- **Have oversight:** Platforms that are accessible to children must be kept on a Register of Services, kept by the regulator.
- **Be robust:** All services, of all sizes, must put in place the full suite of safety measures set out in the Codes. This is because the recommended measures reinforce each other – it is not sufficient, for example, for a platform to have a content moderation policy in place but no mandatory staff training in content moderation.
- **Be effective:** All platforms, of all sizes, in scope of the Act must be required to evidence the effectiveness of their safety mitigation measures to be considered compliant with the Act.
- **Be future-proof:** every aspect of the risk assessment and risk mitigation process must have the flexibility to be applied to emerging technologies, and receptive to emerging harms.

4.1.2. Building protections to keep children safe

2) Every child has the knowledge and support to be safe online. Every child has access to high quality and relevant online safety education.

3) Every child is protected from online harms, and services can effectively safeguard and support them.

"I think children should be more exposed to online safety and health and relationship educations." – Girl, 14.

This is provided both in the classroom and outside of it. As digital pioneers children deserve to grow up in a media literate society with the confidence and vocabulary to talk about the good and bad that happens online.

A culture of openness to these conversations will be achieved by:

- **Media literacy education:** that is age-appropriate, relevant, and of a quality that will be useful for children growing up in an evolving technological environment. The curriculum must reflect the reality that children are often exposed to inappropriate content at an early age as a consequence of being in an as yet unregulated online environment.
- **Mental health support:** all children must have access to the emotional and mental support they need, when they need it. This support should include a whole-school approach to mental health in every school and universal coverage of Mental Health Support Teams, and the rollout of early mental health support hubs in every community.
- **A stronger knowledge base:** to facilitate appropriate and informed conversations in every part of a child's life. The information gathered from technology companies throughout this online safety regime must be provided to parents and teachers in accessible language

4.2. What tools do we have?

Realising those ambitions will require decision makers to use all the tools they currently have available to better protect children online. Those include:

4.2.1. The Online Safety Act 2023

The Children's Commissioner welcomed the Online Safety Act when it received royal assent **and will continue to support the regulator, Ofcom, to implement it. The intention of the Online Safety Act when it was first proposed was to make the UK the safest place to go online.**

The Act provides protection for children against harmful content and has the potential to meaningfully change the online lives of children if it is implemented robustly, and in the spirit of the intention of the Act. The Children's Commissioner is working to ensure that implementation puts children ahead of all corporate interests.

4.2.2. The Children's Safety Codes

To assist services in complying with the Act, the regulator Ofcom is finalising their Children's Safety Codes following a consultation period¹⁸. These codes of practice will set out how services should approach their safety duties. These are not legally binding, but services are still bound by law to protect children from the harms written on the face of the Act in some way. The Codes are recommendations for what those safety measures should look like. Ofcom will be finalising the Codes and presenting them to the government in spring 2025, and the CCo is working with the regulator to ensure the opportunity to protect children presented in the codes are seized. The Commissioner welcomes some provisions in the draft Children's Codes. This includes the evidence base they have used to draw up a Register of Risks, which is a regulatory menu of the risks of harm to children online. This is an example of where the regulator has sought to incorporate proactive as well as reactive inputs to their safety regime.

However, the provisions in the actual Codes of Practice must go much further for the online safety regime to realise the ambition of the Act. In its current form, the Codes will maintain a clean-up regulatory culture, where technology evolves, and harms are addressed after they have occurred.

4.2.3. A manifesto commitment

The final tool is the government's clear ambition. The new government entered office in 2024 promising to build on the Online Safety Act to keep children safe online:

"Children and young people face significant harm online, with inappropriate content too easily available at their fingertips on a smartphone. We have seen an increase in extreme misogynistic content online driving a culture of violence against women. Labour will build on the Online Safety Act, bringing forward provisions as quickly as possible, and explore further measures to keep everyone safe online, particularly when using social media. We will also give coroners more powers to access information held by technology companies after a child's death"¹⁹

The potential for further measures to be brought in to build on the Online Safety Act is welcome, as they might provide the additional safety measures necessary to address the risks of harm highlighted in this report that are not provided for in the Act. The Children's Commissioner welcomes this commitment and will continue to work with them to support their intention to keep children safe online.

CONCERNS ABOUT THE PROPOSED CHILDREN'S CODE

An insufficient suite of safety

measures: Ofcom identified a wide range of risks to children, but did not provide safety measures for all those risks.

Insufficient coverage of safety

measures: not all platforms will be required to put in place safety measures as a package. Instead, they will be allowed to do the bare minimum to the detriment of the effectiveness of the measures they do put in place. For example, some services will be required to only name a member of staff who is accountable for online safety, but no staff online safety compliance training.

A retrospective risk assessment

process: technology companies will currently be basing their assessment of what risks to children are on their platforms on evidence of harm that has already occurred, including reports from child users themselves. This will not be proactive in assessment emerging risks of harms.

Accountability but no responsibility: it is not enough for platforms to have a single staff member who will be accountable when something goes wrong.

5. The way forward

To deliver on these goals for a system that works for children, the new government must rebalance the UK's relationship with the technology industry. Child users must be empowered to exercise their rights and assert control over their use of these products. This section details both the legislative change and the policy change that will be needed.

5.1. Legislation and guidance

Achieving Ambition 1 will require a rewrite of the architecture of the online world. This ambition requires significant reform through legislation and guidance.

- 1. Ofcom** must implement the Online Safety Act as soon as possible. The regulator has set out a roadmap that will mean the Act will be fully implemented by the end of 2026, with the Children's Codes coming into force in the spring of 2025. By that time the Online Safety Act will already be over two years old. The Children's Commissioner recognises that there is procedure to follow but strongly recommends that the regulator puts the resource they require to expedite this process. They must direct the funds and staff capacity towards achieving an effective implementation of the Online Safety Act as soon as possible.
- 2. Ofcom** must implement the Online Safety Act robustly. This means:
 - **Consult children throughout the regulatory process:** children must be consulted during the design, implementation and evaluation of the implementation of the Online Safety Act. As pioneers of the online world, children can contribute valuable insights into emerging harms, and the efficacy of the online safety regime as it is applied. In practice, this will require the regulator to set up a consultation framework for children which goes beyond deliberative engagement. In addition, technology companies must work with Ofcom during this consultation work. This is essential for them to have independent evidence of how child users in the UK experience their services and to set out what might need to change.

- **Structure the online safety regime around the safeguarding principle:** this means taking a preventative approach to harm, rather than assuming something is safe until it is proven otherwise. That means Ofcom should:
 - **Ensure the Children’s Codes provide safety measures for all risks on the Register of Risks.**
 - **Establish an expectation that all platforms which are medium to high risk adopt every measure within the Children’s Code.**
 - **Include proactive inputs in the risk assessment process:** this should include inputs from the children’s consultations run by the regulator, but also results from product testing prior to the release of a product, and inputs from external and independent experts.
 - **Make children’s safety online the responsibility of every member of staff of a technology company:** this will require every service needing to have not only a named member of staff accountable, but for the senior teams to have written responsibilities and every staff member being trained.
 - **Ensure children’s safety is the overriding factor in decision-making:** this will require the regulator to clarify that costs to services is not an appropriate reason not to put in place the highest safety measures.
- **Set ambitious metrics for each safety measure:** the goal, once a risk of harm to children has been identified on a platform, must be for that harm to be removed. In practice, this requires the regulator add a minimum outcome standard to each safety measure. This will remove the safety harbour for online harms which exists if the fulfilment of a legal duty is to merely apply a code measure. Online companies must go beyond compliance with code measures: to comply, they must evidence those measures are working.
- **Embrace the proactive potential of the Act:** an online safety regime must take a forward-looking approach to harm prevention, as opposed to harm mitigation. In practice, this means ensuring that technology companies are required to test their products for safety at every stage. The risk assessment established by the regulator must include a variety of independent

and forward-looking elements as core inputs: this should include assessments from independent experts, evidence from product testing and the intention of the product in question when considered as part of the company's business plan.

3. The government must provide Ofcom with the support they need to implement the Act swiftly and robustly.

4. Ofcom and the government must provide appropriate and accessible guidance for parents, teachers and children on the Online Safety Act and what it will look like for them. Ofcom should collaborate with government and technology companies to draw up this guidance. They should ensure the guidance is:

- Presented in an appealing and accessible format for children;
- Disseminated to all children, and for all children of different backgrounds to have the resources they need to understand the information.
- Present parents and children with information based on a map of the known risks of harm, and a map of the unknown risks of harm which exist online.
- Provide children and the trusted adults around children with information on how they can be included in the consultation processes set up to facilitate the creation of a safe online world.

5.2. System reform

Alongside legislation and guidance, there are additional steps the new government must take to achieve these broader ambitions.

1. **Evaluate:** The government should carry out a review of the scope and effectiveness of the Online Safety Act. This review must:

- Assess how far the regulator's approach has fulfilled the Act's potential;
 - Assess what existing harms are out of scope of the Act;
 - Consult children to assess the impact of the Act on the lives of children; and
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- Assess how proactive the provisions under the Act are to emerging online harms.
2. **Listen to children:** Ofcom should work with the Children's Commissioner's office to establish a framework for children's consultations on the design, implementation and evaluation of online safety regimes.
 3. **Take the child's whole experience:** The government and Ofcom should work with the Children's Commissioner's office to review the relationship between harmful online experiences and the occurrence of harm to a child offline. This review must inform the development of new strategies to safeguard children, promised in the new government's manifesto.
 4. **Support systems:** The government should strengthen the support available to children in the offline world. This includes:
 - The Department for Education must draw up a strategy to address cyberbullying. This strategy must centralise the management of bullying both online and offline, in school and at home. All schools should have a universal approach to this issue.
 - Use the ongoing curriculum review to revise the curriculum on online safety in schools. The curriculum must include age-appropriate, relevant and high-quality information on topics that address the issues that children have asked for help with.
 - A strengthened mental health support system, which includes an early support hub in every community and the adoption of a whole-school approach to child welfare in schools. The impact of the online world on children's wellbeing must be included in the training of staff members of Mental Health Support Teams in schools.
 5. **Data access:** Build public knowledge about the online world to equip children and the adults around them with knowledge about existing and emerging harms. This includes:
 - Research capacity dedicated to assessing the risk of harm to children for all emerging technologies.
 - Research capacity dedicated to assessing the impact of harm on children from existing and emerging technologies, with a view to developing proactive safeguards against it.
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- A culture of open discourse around the children's and adults' experiences of the online world. This is a long-term change that will require the integration of knowledge about children's experience online into the training of teachers, and guidance for parents.

Methodology

The Big Ambition survey was launched in September 2023 via channels including the Children's Commissioner's office website and social media, with a link emailed to all schools in England. The survey was open for just over four months until January 2024, and all children in England aged six to 18 years old were invited to take part, and adults could respond on behalf of children from nought to 18. The survey aimed to collect children's thoughts, ideas and priorities in advance of the general election, in order to gather and convey children's views and experiences to government and decision makers. The survey came in four versions: for primary age children, secondary age children, adults responding on behalf of children, and an 'easy read' version with larger text and more pictures. The 253,000 responses received have been weighted by age, gender and region, to better reflect the population of children in England. A full methodology is available²⁰.

In this report, findings are based on all responses – those directly from children, and those from adults reporting on behalf of children. All respondents to *The Big Ambition* were presented with a series of Likert scale statements, to which they were invited to agree or disagree. Findings are based on all responses, both those directly from children, and those from adults responding on behalf of children.

The easy-read survey asked about agreement with the question "you feel safe online"; the adult version asked about agreement with the question "they feel safe online".

For the most part, every respondent was presented with every statement. The following exceptions applied:

- 'People who run the country listen to your views' was not presented to adults responding on behalf of children.
- 'Your thoughts about the future are listened to' was only shown to adults responding on behalf of children.
- 'You know about apprenticeships, university options and career paths', 'you know about money and life skills' and 'you can access good healthcare when you need it' were only presented to secondary aged children and adults responding on behalf of children.

- 'You feel happy with the way you look' was only shown to secondary aged children.
- 'You know about good jobs for when you are older' was only asked of primary aged children and adults responding on behalf of children.

To each statement children were able to answer 'strongly agree', 'agree', 'disagree', 'strongly disagree', 'neither agree nor disagree' or 'I don't know or don't want to say'. In this report, only 'agree' (strongly agree or agree) and 'disagree' (strongly disagree or disagree) answers are analysed.

The Children's Commissioner's office analysed all 1,545 of the open text responses to the question "What do you think the Government should do to make children's lives better?" containing at least one word or phrase related to the concept 'online'; and at least one word or phrase related to the concept 'harm'. The purpose was to examine what changes children want to see with respect to online harms.

The analysis of free text responses throughout this paper was based on the restricted sample of 1,545 comments which included at least one reference to online harms. Quotes were included if they had a word relating to "online" and a word relating to "harm".

Words relating to "online" were:

"ai"	"vr"	"artificial intelligence"	"augmented reality"
"call of duty"	"chat gpt"	"chatgpt"	"computer"
"console"	"cyberbully"	"cyber bully"	"device"
"digital"	"facebook"	"fifa"	"fortnite"
"forza"	"gaming"	"google"	"imessage"
"instagram"	"internet"	"laptop"	"lootbox"
"mario kart"	"minecraft"	"oculus"	"online gam"
"online safety"	"phone"	"playstation"	"porn"
"ps4"	"ps5"	"pubg"	"reddit"
"roblox"	"search engine"	"snapchat"	"social media"
"super mario"	"tik tok"	"tiktok"	"twitter"
"virtual reality"	"website"	"whatsapp"	"xbox"
"zelda"	"metaverse"	"meta"	"web"

"darkweb"	"onlyfans"	"airdrop"	"amazon prime"
"netflix"	"bing chat"	"among us"	"warzone"
"league of legends"	"overwatch"	"animal crossing"	"open ai"
"midjourney"	"telegram"	"dalle"	"artbreeder"
"xhamster"	"hentai"	"online"	"algorithm"

Words relating to "harm" were:

"risk"	"harm"	"danger"	"safe"
"appropriate"	"paedo"	"pedo"	"catfish"
"phishing"	"bullying"	"depress"	"anxiety"
"body image"	"anorexia"	"bulimia"	"eating disorder"
"dysmorphia"	"self harm"	"suicide"	"scam"
"encrypt"	"grooming"	"groomed"	"abuse"
"abusive"	"hate"	"crime"	"criminal"
"addict"	"homophob"	"racis"	"sexism"

Alongside this, the Children's Commissioner's Office hosted a roundtable with a group of four of her Young Ambassadors in July 2024. The participants included two young women aged 18, and two boys aged 17. The questions prepared for the discussion included:

1. Do you feel any safer since the passing of the Online Safety Act?
2. What types of harmful content do you see on specific online platforms?
3. We know that harmful content can be shared across multiple social media platforms. What is your experience of cross-platform harms?
4. We know that some parts of the design of social media platforms are chosen by companies to increase the time users spend on their platform. These are things like infinite scrolling and the 'like' button. What is your experience of this, and how do you feel about it?
5. Some content types are illegal under the Online Safety Act, and some are recognized to be harmful (e.g. pornography, violent content and content that promotes self-harm, suicide and eating disorders). The government is looking at creating an extra category called 'Non-

Designated Content' (NDC)– which will highlight types of content that do not fit the strict categories above but nonetheless causes harm to children and young people. Do you have a view of what sorts of content should be included in that category?

6. The government has proposed 'depressive content' and 'body image content' to be included as NDC. Do you agree?
7. The government is trying to draw up guidance to help tech companies understand if their service is likely to attract or appeal to children. What do you think causes children to go to the places on the internet that they do?
8. What message do you have for technology companies?

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