



Ofcom Call for Evidence: Content Harmful to Children

March 10, 2026

The Family Online Safety Institute (FOSI) would like to take this opportunity to respond to the [recent call for evidence regarding content harmful to children](#). We appreciate the chance to contribute our insights and provide feedback on this matter. Our response reflects our commitment to children's wellbeing and we hope to engage in a productive dialogue to achieve the best possible outcomes.

[FOSI](#) is an international, non-profit organization working to make the online world a safer place for children and their families. We achieve this by identifying and promoting best practices, tools, and solutions in the field of online safety. FOSI convenes leaders in industry, government, academia, and the non-profit sectors to collaborate and innovate new solutions and policies that ensure a safer, more rewarding digital experience for all. Through research, resources, events, and special projects, FOSI promotes a culture of responsibility online and encourages a sense of digital citizenship for all.

FOSI defines online safety as acknowledging the risks and mitigating the harms in order to reap the rewards of digital life, and we are glad to see Ofcom thoughtfully approach these issues as the UK seeks to become the safest place for a child to be online. In this report, FOSI includes information regarding:

- Positive and negative digitally-mediated adolescent experiences
- Parent perspectives
- Physical and psychological harms associated with technology use
- Classification of eating disorder content and body stigma content
- The impact of AI on primary priority content (PPC) and priority content (PC)

Thank you for considering our input.

The Incidence of Content Harmful to Children

In 2024, FOSI published [*Promoting Wellbeing in a Digital World*](#), a multinational report exploring the role of digital technology in adolescent wellbeing. This study utilized a mixed-methods approach involving qualitative focus groups of parents and adolescents from Brazil, Germany, and the United States, as well as a quantitative survey involving 1,000 participants from each country for a total of 3,000 responses.

Across the three nations, roughly 9 in 10 adolescents indicated their online activity “always” or “often” results in a positive effect on mental, emotional, and/or social wellbeing. This is significantly higher than the proportion of young people reporting consistent negative experiences online. The most common positive experiences were learning new information, feeling more connected to friends and family, being in a happier mood, feeling more relaxed, and discovering new hobbies or interests.

Among parents and adolescents, the most commonly cited benefits include connecting with peers, learning new skills, enhanced academic learning, making new friends, and exploring niche interests. The greatest safety concerns among parents and adolescents were exposure to harmful strangers, online bullying, and online scams. Roughly 7% of parents and 18% of adolescents did not report concerns regarding children’s wellbeing online.

The most common negative experience cited by adolescents was the pressure to check notifications and responses. While users did report negative experiences related to online content, more than three-fourths of parents in each country identified media literacy to identify harmful content as a priority. While this concern was slightly lower among adolescents, in Germany, it was the top priority for young people.

This evidence suggests that policy responses should seek to mitigate risks and expand digital literacy education without undermining the significant benefits young people derive from digital participation. These findings are broadly consistent with research from the United Kingdom showing that children’s online experiences include both meaningful benefits and identifiable risks. Overall, evidence from FOSI’s multinational wellbeing study suggests that while harmful content exists, adolescents report significantly more positive than negative experiences online.

The Potential for Physical or Psychological Harm

Evidence from the same study suggests that the most commonly reported physical harm associated with digital technology use relates to sleep quality. In the United States and Brazil, nearly half of parents and adolescents cited sleep health as negatively affected by digital technology use, while approximately one-third of German parents and adolescents reported a negative effect. Other than sleep quality, negative effects were reported at a significantly lower rate in comparison to positive effects.

Among psychological harms, approximately 20% of parents and adolescents reported a negative impact on emotional health resulting from digital technology use. Body image was also negatively affected, with approximately 14% of parents and 11% of adolescents reporting negative impacts as a result of digital technology use.

These findings suggest that while digital technology use can contribute to certain physical and psychological harms, these effects are often related to patterns of use rather than exposure to harmful content. In particular, the negative effects on sleep health signal the importance of considering broader digital habits, such as nighttime device use and notification management. The most significant tie to harmful content involves negative effects on body image among some adolescents. The relationship between digital technology and body image highlights the need for continued attention to appearance-based pressures online. Considered together, these findings underscore the importance of responses that address harmful content while also supporting healthy digital habits among young users.

Potential Changes to Primary Priority Content (PPC) and Priority Content (PC)

Our data supports maintaining eating disorder content as primary priority content (PPC) and body stigma content as at least non-designated content (NDC), with the potential to shift to priority content (PC). As previously discussed, some parents and adolescents report negative effects on body image as a result of technology use. Continuing to focus on eating disorder content as a primary priority, while giving careful consideration to body stigma content, can help combat appearance-based pressures affecting young people online.

Given increasing use of generative artificial intelligence (GenAI) content among young people, PPC, PC, and NDC areas must be prepared for the impact of GenAI. FOSI's 2025 report [*Generative AI in Uncertain Times: How Teens are Navigating a New Digital Frontier*](#) found nearly half of adolescent GenAI users use these tools at least once a week. GenAI is capable of producing content in all currently designated PPC areas (pornographic content, self-injury content, suicidal content, and eating disorder content). Worryingly, these platforms have been used to create nonconsensual "deepfake" content including non-consensual intimate images (NCII). It is critical Ofcom continues to be vigilant and agile in this area and includes AI-generated harmful content in its risk considerations and mitigations.

Summary

In summary, FOSI's research finds that while young people encounter harmful content online, their experiences are predominantly positive. Online communities provide meaningful opportunities for social interaction, learning, and creativity for young people. Areas of concern include impacts on sleep, body image, and emotional health, signaling the need for a balanced approach to youth online safety. Ofcom should continue to target harmful content while also focusing on digital literacy education for adolescents and parents alike.

Emerging technologies including artificial intelligence continue to shape our online landscape and the digital experiences of young people. It is essential to ensure existing procedures and programs include some artificially generated content, such as artificially generated nonconsensual intimate images (NCII), within the scope of harmful content.

FOSI welcomes the opportunity to continue working with Ofcom to address growing online safety concerns.

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