



TO: Ofcom

FROM: Common Sense Media

DATE: 22 July 2025

RE: [Consultation](#): Illegal harms: user controls

CONFIDENTIALITY:

Per Ofcom's consultation response form, the whole response below is not confidential. Responses may be attributed to Common Sense Media.

Point of contact: Holly Grosshans, Senior Counsel, Tech Policy

RESPONSE:

Common Sense Media is the leading nonprofit organisation working on behalf of children and teens to make their world healthier, safer, and more equitable. Backed by the research that's the foundation of everything we do, we champion quality media that entertains and inspires, and support legislation that aims to close the digital divide and hold social media and AI platforms accountable. We encourage students and educators to think critically about technology and become responsible digital citizens. And we safeguard children's health and well-being by protecting their data privacy and reducing potential online harms.

We are pleased to submit these comments in response to Ofcom's Consultation – Illegal harms: user controls. Common Sense Media supports Ofcom's efforts to protect the safety of minors online while ensuring their freedom of expression, and we offer constructive suggestions to achieve this balance below.

More specifically, our responses to the consultation:

- Highlight proposed legislation and laws recently enacted in the U.S. that aim to address the broad range of threats that minors face online.
- Demonstrate how risk assessments could help make the online world safer for minors.

QUESTION 1: Do you agree with our proposal? Provide any evidence to support your answer.

First, we commend Ofcom for taking tangible steps to encourage accountability among all online platforms for their effects on minors. Ofcom has commendably tackled a broad range of online threats to minors and admirably proposes to expand coverage to reduce continued online harm. Common Sense Media is a staunch advocate for legislation limiting the harm of unwanted contact by online strangers towards minors. See New York Children's Online Safety Act ("NY COSA")¹, introduced during the 2025 legislative session, and also California's Protecting Our Kids from Social Media Addiction Act ("Social Media Addiction Act")², signed into law on September 20, 2024. Given Common Sense Media's expertise in research and policy advocacy concerning online harms to children, we would like to affirm Ofcom's expansion of ICU J1 and ICU J2 to providers of certain medium and small user-to-user services that are likely to be accessed by children and to provide additional evidence substantiating the harm of unwanted social media contact.

Ofcom's amendment would expand blocking and muting user accounts, and muting comments to medium and smaller user-to-user services with either a medium or high risk for one or more relevant harms like harassment and assisting suicide. Common Sense has zealously advocated for online safety and age-appropriate design, including reducing the risk of harmful interactions. NY COSA, if enacted, would automatically protect children from direct and private messages, profile views, tagging, and financial transactions by online strangers.³ California's Social Media Addiction Act, which was signed into law but is being challenged in court, allows parents to limit the amount of likes or other forms of feedback children receive on social media platforms that utilize addictive design features and are considered an "addictive internet-based service or application." It also automatically sets children's accounts to private on these services or applications, where only users they chose to connect with can view or comment on posts from the minor user.⁴ These bills prevent unwanted contact between children and harmful individuals, limiting the amount of social media engagement by unknown individuals and thereby limiting the risks to kids and teens in their online interactions.

Online, strangers are given boundless default access to influence and harm minor users. Social media has increased the tools for coercive control, harassment, and stalking as abusers can send hundreds of messages a day and use the platform's geolocation tools to stalk victims.⁵ Nearly 6-in-10 adolescent girls say they had uncomfortable contact by strangers on social media.⁶ Some children can struggle to distinguish between healthy

¹ S. 4609, 2025-2026 Leg., Reg. Sess. (N.Y. 2025); A. 6549, 2025-2026 Leg., Reg. Sess. (N.Y. 2025).

² Protecting Our Kids From Social Media Addiction Act, Cal. Health & Safety Code § 27000-07 (2024).

³ N.Y. S. 4609; N.Y. A. 6549.

⁴ Cal. Health & Safety Code § 27000-07.

⁵ Dana Cuomo & Natalie Dolci, *New tools, old abuse: Technology-Enabled Coercive Control (TECC)*, 126 *Geoforum* 224 (2021), <https://doi.org/10.1016/j.geoforum.2021.08.002>.

⁶ U.S. Surgeon General, Advisory: Social Media and Youth Mental Health 9 (2023), <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>.

interaction and coercive control, struggles often influenced by the content found on social media.⁷ The ability to block accounts and mute comments from strangers ensures children are not contacted by those with malicious intent and do not form incorrect impressions of appropriate relationships.

Cyberbullying is a common experience for children. In 2023, 19% of English and Welsh children suffered from a cyberbullying experience.⁸ In Common Sense's own research, girls often deal with cruel comments, accounts made solely for bullying, and unwanted messages.⁹ Platforms vary in exposure to bullying and unwanted messages, but each platform has unfortunate examples of these activities.¹⁰ This often coincides with in-person bullying, creating a cycle where children face bullying in spaces they turn to for relaxation.¹¹ The ability to block or mute negativity provides reprieve from constant bullying and improves children's enjoyment of social media.

Children also face a flood of negative content, often in the form of comments. The majority of young people experience harmful content (racist, homophobic, sexist, or body-shaming comments) sometimes or often while on social media.¹² In a Common Sense 2024 research study, over 30% of girls on most social media platforms see eating disorder content on social media monthly.¹³ Negative content contributes to teenagers' feelings of burnout and stress with appearance, social life, and activism being particularly vulnerable.¹⁴ Children can feel "called out" to engage in trends and harassed into negative emotions by failing to meet inflated social media standards.¹⁵ Removing harassing social media members can reduce children's exposure to negative content and reduce pressure to engage in negative trends like stereotyping or body shaming.

⁷ Holly Scothorne et al., *Are social media platforms blurring the lines between coercive control and healthy relationship? A study investigating perceptions of coercive control*, 168 *Comput. in Hum. Behav.* 108649 (2025), <https://doi.org/10.1016/j.chb.2025.108649>.

⁸ Off. of Nat'l Stat., *Bullying and online experiences among children in England and Wales: year ending March 2023* (2024), <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/bullyingandonlineexperiencesamongchildreninenglandandwales/yearendingmarch2023>.

⁹ Jacqueline Nesi et al., *How Girls Really Feel About Social Media* 28 (Jennifer Robb ed., 2023), https://www.commonsensemedia.org/sites/default/files/research/report/how-girls-really-feel-about-social-media-researchreport_web_final_2.pdf.

¹⁰ *Id.*

¹¹ *Id.* at 9.

¹² Mary Madden et al., *A Double-Edged Sword: How Diverse Communities of Young People Think About the Multifaceted Relationship Between Social Media and Mental Health* 23 (2024), https://www.commonsensemedia.org/sites/default/files/research/report/2024-double-edged-sword-hope-lab-report_final-release-for-web-v2.pdf.

¹³ Nesi, *supra* note 9, at 39.

¹⁴ Emily Weinstein et al., *Unpacking Grind Culture in American Teens: Pressure, Burnout, and the Role of Social Media* 22-27 (2024), https://www.commonsensemedia.org/sites/default/files/research/report/2024-unpacking-grind-culture-in-american-teens_final-release-updated-for-web.pdf.

¹⁵ *Id.* at 27; Nesi, *supra* note 9, at 28.

Social media regularly exposes children to suicidal content. In a Common Sense 2024 research study, over 20% of girls see suicidal content on social media platforms weekly.¹⁶ Over 10% see suicidal content daily.¹⁷ Social media has tragically led to children's deaths due to suicide-related and self-harm content.¹⁸ The platforms can normalize self-harm behaviors like cutting and partial asphyxiation.¹⁹ In a UK-wide case series study, 24% of youth suicides included suicide-related online experiences.²⁰ 5% of these online experiences were cyberbullying, while 10% of these experiences were communicating suicidal ideas or intent.²¹ These suicide-related online experiences often involve posting about suicide intentions or ideas, often causing a backlash from some online members in the comment section who will promote these ideas.²² Exposure to online suicide and self-harm related content can be reduced by blocking enabling user accounts and comments.

This is especially dangerous for vulnerable communities. In a Common Sense 2024 research study, 62% of young people with moderate to severe depressive symptoms face criticism and harassment when posting content to social media.²³ 36% are stressed by social media metrics like comments and likes.²⁴ For adolescent girls who face daily bullying, drama, or feeling left out during in-person interactions, they are three times more likely to have negative social media experiences than other adolescent girls.²⁵ LGBTQ+, Black, and Latino children are more likely to face negative experiences on social media than non-LGBTQ+ or white peers.²⁶ Out of youth suicide deaths, members of the LGBTQ+ community were twice as likely to have suicide-related online experiences.²⁷ The ability to manage access to their social media accounts, vulnerable communities have more tools to protect themselves and avoid the dangers of social media.

It is clear to children that social media companies cannot solve these issues on their own. 75% of adolescents believe social media companies are doing a fair to poor job of addressing cyberbullying and online harassment.²⁸ Adolescent girls want to block negative content from their social media, block unwanted contact from adults, and have a platform

¹⁶ Nesi, *supra* note 9, at 39.

¹⁷ *Id.*

¹⁸ U.S. Surgeon General, *supra* note 6, at 8.

¹⁹ *Id.*

²⁰ C. Rodway et al., *Online harms? Suicide-related online experience: a UK-wide case series study of young people who die by suicide*, 53 *Psych. Med.* 4434 (2022), <https://doi.org/10.1017/S0033291722001258>.

²¹ *Id.*

²² *Id.*; Aksha M. Memon et al., *The role of online social networking on deliberate self-harm and suicidality in adolescents: A systematized review of literature*, 40 *Indian J. Psychiatry* 384 (2018), <https://doi.org/10.4103/psychiatry.IndianJPsychiatry.414.17>.

²³ Madden, *supra* note 12, at 9.

²⁴ *Id.*

²⁵ Nesi, *supra* note 9, at 34.

²⁶ Madden, *supra* note 12, at 6-7.

²⁷ Rodway, *supra* note 20.

²⁸ U.S. Surgeon General, *supra* note 6, at 9.

that feels safe to “hang out and talk together.”²⁹ Due to the insufficient actions by companies, children often use their limited tools to improve their social media experience. In a Common Sense 2024 research study, 67% of youths curate their social media feed away from harmful content, while 63% will take temporary breaks from social media.³⁰ 41% permanently took a break from a social media platform.³¹ Providing children with the ability to block negative comments and accounts allows children to improve their ability to self-regulate their social media experience.

CONCLUSION

Common Sense Media emphasizes that meaningful engagement is vital to safeguarding children in the digital landscape. Additionally, strong global collaboration among regulators, civil society, and the tech industry is crucial for tackling shared challenges and enforcing child safety policies. We commend Ofcom for its global outreach, regulatory advancements, and commitment of resources to navigate these complex issues.

We appreciate the opportunity to participate in the Illegal Harms: User Controls Consultation. As a trusted global brand dedicated to children and families, we are eager to contribute our perspectives as Ofcom formulates essential regulatory guidance, standards, and tools aimed at enhancing the well-being of children in the UK.

²⁹ Nesi, *supra* note 9, at 37.

³⁰ Madden, *supra* note 12, at 4.

³¹ Madden, *supra* note 12, at 4.

ABOUT COMMON SENSE MEDIA UK

Common Sense Media is an independent nonprofit organisation dedicated to helping children thrive in a rapidly changing world. The organisation is based in San Francisco, California with regional offices across the U.S. Common Sense launched its first international office in the UK in 2019, a registered charity (also Common Sense Media, 1188840), through which it rates, educates, investigates, and advocates for the safety, privacy, and well-being of children in the UK and globally. Common Sense Media achieves its aim to create a healthier, equitable, and empowering future for children in the following ways:

RATE: Through its U.S.-based parent platform, Common Sense Media, it provides independent ratings and reviews of various forms of media.

EDUCATE: Through Common Sense Education, it shares its Digital Citizenship curriculum with millions of teachers across the world to increase media literacy and shape digital citizens, as well as offer tips to families and communities as they navigate media and technology. The curriculum has been adapted for the UK and translated into Welsh.

INVESTIGATE: Its team conducts independent research to provide parents and caregivers, educators, health organisations, and policymakers with reliable, independent data on young people's use of media and technology and its impact on their physical, emotional, social, and intellectual development.

ADVOCATE: It advocates and raises awareness to drive policy and industry changes that protect the safety, well-being, and privacy of children in the digital world, including the UK, EU, and USA.

For more information, visit <https://www.commonsense.org/> and <https://www.commonsensemedia.org.uk>