Your response

Question (Volume 2)	Your response
Question 6.1: Do you have any comments on Ofcom's assessment of the causes and impacts of online harms? Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 6.2: Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer.	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 3)	Your response
Question 8.1: Do you agree with our proposals in relation to governance and accountability measures in the illegal content Codes of Practice? Please provide underlying arguments and evidence of efficacy or risks to support your view.	*[Is this answer confidential? No* *I agree with them with regard to the kind of services where illegal content may be encountered.* *I consider that, notwithstanding the lower requirements for smaller and low risk services, the proposals are disproportionate when applied to small scale non-commercial discussion forums for sport and hobbies, typically run by volunteers, which never host illegal content and have few if any child users. I expect that many such forums will not have the resources to meet the proposed duties and will close as a result.*

Question (Volume 3)	Your response
Question 8.2: Do you agree with the types of services that we propose the governance and accountability measures should apply to?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 8.3: Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to requiring services to have measures to mitigate and manage illegal content risks audited by an independent third-party?	*[Is this answer confidential? No* *This would not apply to the services I am responding about*
Question: 8.4: Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to tie remuneration for senior managers to positive online safety outcomes?	*[Is this answer confidential? No* *This would not apply to the services I am responding about, which might typically involve between one and ten volunteers working less than an hour per week eac.*
Question 9.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 9.2: Do you think the four-step risk assessment process and the Risk Profiles are useful models to help services navigate and comply with their wider obligations under the Act?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 3)	Your response
Question 9.3: Are the Risk Profiles sufficiently clear and do you think the information provided on risk factors will help you understand the risks on your service?[1]	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 10.1: Do you have any comments on our draft record keeping and review guidance?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 10.2: Do you agree with our proposal not to exercise our power to exempt specified descriptions of services from the record keeping and review duty for the moment?	*[Is this answer confidential? No* *No. It should be possible to exempt small, low risk, non-commercial services that do not have a significant number of child users. This could require just a single declaration that they do not host illegal content and that their current management arrangements have been demonstrably adequate to ensure this. This would be underpinned by an expectation that if this statement was found to be incorrect, substantially more onerous requirements would be imposed.* *It is important to understand that the kind of services I am interested in are not targeted by people with illegal intent, as there would be no return for their effort.*

[1] If you have comments or input related the links between different kinds of illegal harm and risk factors, please refer to Volume 2: Chapter 5 Summary of the causes and impacts of online harm).

Question (Volume 4)	Your response
Question 11.1: Do you have any comments on our overarching approach to developing our illegal content Codes of Practice?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 11.2: Do you agree that in general we should apply the most onerous measures in our Codes only to services which are large and/or medium or high risk?	*[Is this answer confidential? No* *Yes*
Question 11.3: Do you agree with our definition of large services?	*[Is this answer confidential? No* *Broadly, yes, but not the corollary for small services. Where the line is drawn between large and small is not within my experience, but I consider there should also be a 'de minimis' category below small.*
Question 11.4: Do you agree with our definition of multi-risk services?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 11.6: Do you have any comments on the draft Codes of Practice themselves?[2]	*[Is this answer confidential? Yes / No (delete as appropriate)]*

[2] See Annexes 7 and 8.

Question (Volume 4)	Your response
Question 11.7: Do you have any comments on the costs assumptions set out in Annex 14, which we used for calculating the costs of various measures?	*[Is this answer confidential? No* *For context, the kind of services I am concerned about will typically have total annual turnover of £50-£1000, being the cost of hosting, balanced by donations and sponsorship/limited advertising where necessary.*
Question 12.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *It depends what you call a system; how formal should it be? I have never seen illegal content on the very small low risk services I'm concerned about – their systems work. On the one I moderate, the first post of any new member must be reviewed before it's visible to users; occasionally there may be a link which might lead to dubious content but mostly they are genuine users or spammers making fake posts to build a reputation, and easily spotted.*
Question 13.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *Not applicable*
Question 14.1: Do you agree with our proposals? Do you have any views on our three proposals, i.e. CSAM hash matching, CSAM URL detection and fraud keyword detection? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *Not applicable*
Question 14.2: Do you have any comments on the draft guidance set out in Annex 9 regarding whether content is communicated 'publicly' or 'privately'?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 4)	Your response
Question 14.3: Do you have any relevant evidence on: • The accuracy of perceptual hash matching and the costs of applying CSAM hash matching to smaller services; • The ability of services in scope of the CSAM hash matching measure to access hash databases/services, with respect to access criteria or requirements set by database and/or hash matching service providers; • The costs of applying our CSAM URL detection measure to smaller services, and the effectiveness of fuzzy matching[3] for CSAM URL detection; • The costs of applying our articles for use in frauds (standard keyword detection) measure, including for smaller services; and • An effective application of hash matching and/or URL detection for terrorism content, including how such	*[Is this answer confidential? No* *Not applicable*

[3] Fuzzy matching can allow a match between U2U content and a URL list, despite the text not being exactly the same.

Question (Volume 4)	Your response
measures could address concerns around 'context' and freedom of expression, and any information you have on the costs and efficacy of applying hash matching and URL detection for terrorism content to a range of services.	
Question 15.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *Not applicable*
Question 16.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *The site I moderate has a 'report' link on every post. Reports are flagged to moderators. Typically, the reports we receive are about posts in the wrong place, or perhaps an aggressive tone by a poster. The system is built into the forum software.*
Question 17.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. *[Is this answer confidential? No* *Not applicable*	*[Is this answer confidential? No* *It will be necessary to customise forum software to implement formal ToS – I accept this is a requirement of the Act.*
Question 17.2: Do you have any evidence, in particular on the use of prompts, to guide further work in this area?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 4)	Your response
Question 18.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. *[Is this answer confidential? No* *Not applicable*	*[Is this answer confidential? No* *Not applicable*
Question 18.2: Are there functionalities outside of the ones listed in our proposals, that should explicitly inform users around changing default settings?	
Question 18.3: Are there other points within the user journey where under 18s should be informed of the risk of illegal content?	
Question 19.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. *[Is this answer confidential? No* *Not applicable*	*[Is this answer confidential? No* *I do not believe many of the services I'm concerned about use recommenders, so this would not be applicable.*
Question 19.2: What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing?	

Question (Volume 4)	Your response
Question 19.3: We are aware of design features and parameters that can be used in recommender system to minimise the distribution of illegal content, e.g. ensuring content/network balance and low/neutral weightings on content labelled as sensitive. Are you aware of any other design parameters and choices that are proven to improve user safety?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 20.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *Not applicable to low risk services*
Question 20.2: Do you think the first two proposed measures should include requirements for how these controls are made known to users?	
Question 20.3: Do you think there are situations where the labelling of accounts through voluntary verification schemes has particular value or risks?	

Question (Volume 4)	Your response
Question 21.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *The service I moderate has no hesitation to block any user whose posts are aligned to the purpose of the forum, even where these are not harmful. There is no commercial incentive, and no point in retaining users who are not contrubuting. If there were harmful posts the users would be deleted immediately and in most cases their IP addresses and email addressed blocked (most are non-UK IPs)*
Question 21.2: Do you have any supporting information and evidence to inform any recommendations we may make on blocking sharers of CSAM content? Specifically: • What are the options available to block and prevent a user from returning to a service (e.g. blocking by username, email or IP address, or a combination of factors)? What are the advantages and disadvantages of the different options, including any potential impact on other users? • How long should a user be blocked for sharing known CSAM, and should the period vary depending on the nature of the offence committed? • There is a risk that lawful content is erroneously classified as CSAM by automated systems, which may impact on the rights of law-abiding users. What steps can services take to manage this risk? For example, are there	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 4)	Your response
alternative options to immediate blocking (such as a strikes system) that might help mitigate some of the risks and impacts on user rights?	
Question 22.1: Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.	*[Is this answer confidential? No* *Not applicable to U2U*
Question 23.1: Do you agree that the overall burden of our measures on low risk small and micro businesses is proportionate?	*[Is this answer confidential? No* *No. Most of the services I am concerned about are not even micro 'businesses' – they make no profit and are more akin to clubs. If they are treated as businesses they will cease to exist; volunteers cannot sustain the resources necessary. The internet has revolutionised communication; it would be very sad if the harmless parts of it were destroyed by measures to control the harmful parts.*
Question 23.2: Do you agree that the overall burden is proportionate for those small and micro businesses that find they have significant risks of illegal content and for whom we propose to recommend more measures?	*[Is this answer confidential? No* *Not applicable to services which do NOT attract illegal content*
Question 23.3: We are applying more measures to large services. Do you agree that the overall burden on large services proportionate?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 4)	Your response
Question 24.1: Do you agree that Ofcom's proposed recommendations for the Codes are appropriate in the light of the matters to which Ofcom must have regard? If not, why not?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 5)	Your response
Question 26.1: Do you agree with our proposals, including the detail of the drafting? What are the underlying arguments and evidence that inform your view.	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 26.2: Do you consider the guidance to be sufficiently accessible, particularly for services with limited access to legal expertise?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 26.3:	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 5)	Your response
What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements?	

Question (Volume 6)	Your response
Question 28.1: Do you have any comments on our proposed approach to information gathering powers under the Act?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 29.1: Do you have any comments on our draft Online Safety Enforcement Guidance?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Annex 13)	Your response
Question A13.1: Do you agree that our proposals as set out in Chapter 16 (reporting and complaints), and Chapter 10 and Annex 6 (record keeping) are likely to have positive, or more positive impacts on opportunities to use Welsh and treating	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Annex 13)	Your response
Welsh no less favourably than English?	
Question A13.2: If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Please complete this form in full and return to IHconsultation@ofcom.org.uk.