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)]* Section 6I. Firearms and other weapons offences, seems slightly hysterical and lacking any considered evaluation of risks.
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? ~~Yes~~ / No (delete as appropriate)]* In general yes, however I am concerned that the definition of multi-risk services is too wide.

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)]* I am concerned that the definition of multi-risk services is too wide.
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? ~~Yes~~ / No (delete as appropriate)]* *No*
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? ~~Yes~~ / No (delete as appropriate)]* *No*
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)]* No. This is excessively beurocratic for small businesses.
Question 9.2: Do you think the four-step risk assessment process and the Risk Pro-	*[Is this answer confidential? Yes / No (delete as appropriate)]*

Question (Volume 3)	Your response
files are useful models to help services navigate and comply with their wider obligations under the Act?	
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)]* It seems excessively beurocratic for small businesses
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? ~~Yes~~ / No (delete as appropriate)]* No. Certainly the smallest providers should be exempt.

[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)]* It seems pretty sensible.
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? ~~Yes~~ / No (delete as appropriate)]* Yes
Question 11.3: Do you agree with our definition of large services?	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* Yes
Question 11.4: Do you agree with our definition of multi-risk services?	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* No.
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)]* The user-to-user ones seem pretty sensible. The search one is phrapse too wide ranging, and I doubt that it is even neccessary.

[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? ~~Yes~~ / No (delete as appropriate)]* No
Question 12.1: 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)]* Yes.
Question 13.1: 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)]* No. Too wide ranging, and probably not even neccessary.
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? ~~Yes~~ / No (delete as appropriate)]* I do not have the technical background to answer this question.
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 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	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* *No*

[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
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? ~~Yes~~ / No (delete as appropriate)]* Yes.
Question 16.1: 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)]* They are theoretically desirable, assuming they are practical to implement.
Question 17.1: 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)]* Yes
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)]* *No*
Question 18.1: 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)]* Yes.

Question (Volume 4)	Your response
Question 18.2: Are there functionalities outside of the ones listed in our proposals, that should explicitly inform users around changing default settings?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 18.3: Are there other points within the user journey where under 18s should be informed of the risk of illegal content?	*[Is this answer confidential? Yes / No (delete as appropriate)]*
Question 19.1: 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)]* No. Too complex.
Question 19.2: What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

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? ~~Yes~~ / No (delete as appropriate)]* No. Offering users the option of disabling comments on their own posts and blocking users is not desirable or appropiate for all services.
Question 20.2: Do you think the first two proposed measures should include requirements for how these controls are made known to users?	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* *N/A*
Question 20.3: Do you think there are situations where the labelling of accounts through voluntary verification schemes has particular value or risks?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

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? ~~Yes~~ / No (delete as appropriate)]* *Yes*
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 alternative options to immediate blocking (such as a	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* *No*

Question (Volume 4)	Your response
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? ~~Yes~~ / No (delete as appropriate)]* *Yes.*
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? ~~Yes~~ / No (delete as appropriate)]* No. It is excessive.
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? ~~Yes~~ / No (delete as appropriate)]* No. Too many businesses will be covered.
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)]* *Yes.*

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)]* *No. M*easures are not proportionate or technically feasible for providers of a very low size. Measures are not proportionate to the risk of harm presented by services of a very low size.

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: What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements?	*[Is this answer confidential? Yes / No (delete as appropriate)]*

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 Welsh no less favourably than English?	*[Is this answer confidential? ~~Yes~~ / No (delete as appropriate)]* *No.*
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)]* These proposals will have no adverse effects regarding such matters. I would expect Welsh treated no less favourably than English.

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