

## Online Suicide and Self-harming Communications: Providing Protection for Children under Online Regulation?

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*Online content promoting suicide and self-harm has been found by a number of researchers to be a major and rising concern for users aged 13-17, on the basis of finding a correlation between suicidal or self-harming behaviour in under-18s and visiting sites depicting images of self-harm and suicide, accompanied by text advocating or promoting such activity. Ofcom has found that age is a risk factor: the risk of encountering and being influenced by such content increases with the age of children and teenagers. Further, those with existing mental health challenges may be more likely to engage with this content, and self-harming behaviour or suicidal ideation may therefore increase. Children and teenagers, the Ofcom Report pointed out, are also more susceptible to a contagion effect than adults: they are more likely to imitate behaviours encountered online and give in to impulse. The Online Safety Act 2023 (OSA) in the UK was introduced partly to address the harm to under-18s created by the presence and influence of self-harm and suicide sites/communications, by creating a regulatory regime covering in-scope online services, including such sites and also social media platforms such as Facebook, Instagram, X, TikTok, on which such content may appear, and be promoted by recommender algorithms. This article will critically examine the efficacy of the OSA in relation specifically to regulation via content moderation and other methods of protecting children from harm caused by encountering such content online, concluding that the OSA regime in a range of respects is proving to be ineffective. This article will focus most closely on the legal but harmful scheme under the OSA aimed at under-18s, not adults, in relation to curbing the harm caused by content encouraging children to engage in self-harm or suicide.*

### Introduction

Online services have the capacity to enrich children's lives in myriad ways so long as they have the 'resources and support in their physical and social environments to navigate digital spaces safely'.<sup>1</sup> This is especially true in terms of enhancing their opportunities to exercise freedom of expression, not only in relation to their personal interactions. That is in part because the internet provides them with the technological architecture to circumvent various barriers to communication,<sup>2</sup> which for children can include parental control or oversight.<sup>3</sup> When accompanied with adequate support and supervision, it can, therefore, increase their opportunities to freely communicate – often instantaneously – with others, including friends and family from anywhere

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<sup>1</sup>OECD (2025) para 2.2.

<sup>2</sup>Fenwick & Coe (2025), p. 747.

<sup>3</sup>E.g. Higson-Bliss & Street (2026) for an argument on this point in respect of the use of virtual private networks (VPNs).

in the world, at any time of day.<sup>4</sup>

However, such freedom of communication also brings with it a range of online harms, especially affecting children, in particular, online content promoting suicide and self-harm. Such content has been found by a number of researchers to be a major and rising concern for users aged 13-17, on the basis of finding a correlation between suicidal or self-harming behaviour in under-18s and visiting sites/pages presenting text and images promoting self-harm and suicide accessible by children.<sup>5</sup> In particular, content promoting self-harm and suicide has been found by Ofcom to be a particular concern in relation to that age group; its 2025 Report found that 30 per cent of persons within that age group had seen or heard of primary priority content including self-harm and suicide.<sup>6</sup> Ofcom has found that age is a risk factor: the risk of encountering such content increases with the age of children and teenagers.<sup>7</sup> Ofcom has also found that a number of deaths in the UK have been linked with online material where detailed information is shared on methods of suicide and self-harm, or where suicidal and self-harm behaviours are actively encouraged.<sup>8</sup> It further found that children may encounter such content accidentally or have it recommended to them by algorithms. Its 2024 Report suggested that four per cent of UK internet users have seen online content promoting suicide in the last month, and children are more likely to see it than adults.

The Online Safety Act 2023 (OSA) was introduced in order to address a range of online harms created by content on various online services, such as Facebook, Instagram, Snapchat, X, TikTok, but in particular those affecting children, one of the main reasons given for its introduction.<sup>9</sup> To further that aim the OSA includes offences linked to suicide and self-harm as ‘priority illegal content’ for regulatory purposes, and also creates a legal but harmful scheme aimed only at under-18s, not adults, which specifically singles out sites and processes encouraging self-harm or suicide in that age group. This article will focus most closely on that legal but harmful scheme in relation to curbing the harm caused by sites and processes, such as recommender algorithms, encouraging children directly or indirectly to engage in self-harm or suicide.

Ofcom was installed as the online regulator, and accorded various powers in order to enforce the safety duties discussed below, imposed on the services. It can fine regulated services up to £18 million, or 10 per cent of annual global turnover, whichever is higher, if they fail in their duty of care (Sched. 13, para. 4). Ofcom has the power to block non-compliant services from being accessed in the UK since ss.144-148 provide for ‘business disruption measures’ that allow it to apply for a variety of ‘restriction orders’ if the regulated service has failed to meet certain conditions relevant to the restriction sought. That could include requesting third-party

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<sup>4</sup>Ofcom (2024), pp. 17-18.

<sup>5</sup>The Molly Rose Foundation (2025) commissioned research which found that around 1.5 million young people in the UK may be exposed to high-risk online content on a weekly basis. It demonstrated that this content is frequently delivered through algorithmic recommendations rather than active searches, exacerbating the risks created for vulnerable users.

<sup>6</sup>See Ofcom (2025b), p. 85.

<sup>7</sup>Ofcom (2025c), p. 50: ‘Research indicates that the risk of encountering this content online increases with children’s age’.

<sup>8</sup>Ofcom (2025d).

<sup>9</sup>OSA, s1(3)(b)(i).

companies to stop providing services or facilitating access to the non-compliant platform, meaning that it would be erased from search results, app stores, or links on social media posts. S.110 creates criminal offences, pursuant to s.109, for named senior managers of in-scope services in respect of failures to provide the requisite information needed to determine compliance (Part 7 chp. 4; see also ss.111-113). The problem is that Ofcom is under-resourced when compared with the companies it is attempting to regulate. Further, Ofcom appears already to be adopting a cautious approach to the demands placed on the companies and deployment of the sanctions at its command.<sup>10</sup>

While seeking to address online harms, the OSA also attempts to preserve free expression online,<sup>11</sup> while creating a scheme intended to protect users from online harms, especially those affecting children. A key concern is with the ability of this model of regulation to navigate a path between fostering such expression while curbing such harms. The primary provisions that preserve and protect free expression are section 22 (for user-to-user services) and section 33 (for search services). These provisions mandate that platforms have a statutory duty to prioritize and protect users' rights to freedom of expression within the law, protected in the UK by Article 10 of the European Convention on Human Rights, received into domestic law by the Human Rights Act 1998 (HRA). Thus these sections place the services, as private bodies, in a position similar to that of public bodies which are subject to Article 10 due to s6 of the HRA. Specifically, these provisions require providers to avoid over-reach by ensuring that their automated filters and takedown rules do not disproportionately censor lawful speech.

Therefore, in discussing the provisions of the OSA below, intended to protect children from online content promoting suicide or self-harm, the services need to take free expression into account, especially when confronting lawful content (section 4 below). This article sets out to critically examine the efficacy of the OSA in relation specifically to regulation via content moderation and other methods of protecting children from harm caused by encountering such sites and content, concluding that the regime in a range of respects is proving to be ineffective. Thus, it is not fully protecting children from the online harms discussed here, but there is also little evidence as yet that Ofcom is taking steps to address company over-reach, adversely affecting free expression, in terms of deploying their own terms of service in ways that at times lead to content removal even where that is not required by the OSA.

### **Harms caused by Suicide and Self-harm-related Content Online**

The perception that online communications were contributing to serious self-harm and suicide among children was a key reason for the introduction of the OSA.<sup>12</sup> The Molly Rose Foundation, whose recommendations informed the OSA, argue that the exposure of children to self-harm and suicide content on various sites and social media is not merely incidental or transient, but is rather a pervasive aspect of

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<sup>10</sup>See: Children's Commissioner (2025).

<sup>11</sup>See e.g.: Bhagwat and Weinstein (2021); Post (2006); Greenawalt (1989); Blasi (1977). While these works concern free speech off-line, their messages are also applicable to online expression.

<sup>12</sup>House of Lords, House of Commons (2021).

the business model of the platforms.<sup>13</sup> This is so due to methods inbuilt by design of encouraging user continued engagement and also partly because digital media, unlike traditional media, has limited editorial control over content production and dissemination, and therefore allows harmful user-generated content to spread.<sup>14</sup> Poorly moderated services, including social media are demonstrably capable of immersing vulnerable children in a culture of self-harm and suicide,<sup>15</sup> and of contributing to pro-self-harm and pro-suicide ideation and motivation, as discussed below.<sup>16</sup> Both of the latter were evident from the inquest into the suicide of Molly Russell, a fourteen year-old who killed herself after becoming immersed in suicide and self-harm content on Instagram.<sup>17</sup> The Coroner in the inquest that followed found that social media had significantly contributed to Molly's suicide, singling out Instagram's recommendation-algorithm as a substantial factor in confirming her depressive suicidal ideation.<sup>18</sup> While a causal link between any specific images and engaging in serious self-harm was not found, it was established that Instagram's algorithm contributed to Molly becoming overwhelmed with thoughts of ending her life.<sup>19</sup>

Molly Russell's case provides an effective illustration of the harms of online platforms. Molly began posting on Instagram when she was twelve, contrary to the terms of service,<sup>20</sup> as Instagram lacked age-verification screening at the time,<sup>21</sup> and by the time of her suicide had amassed hundreds of hours browsing, commenting and messaging on the platform. While maintaining an outward appearance of normality to her family, she had, in the six months prior to her suicide, begun to withdraw from offline social relationships and spent a significant amount of her free time on Instagram and other online platforms.<sup>22</sup> This time was, unbeknownst to her family and offline friends, devoted in part to accessing unnuanced pro-self harm and suicide content,<sup>23</sup> which formed thirteen percent of the over sixteen thousand pieces of Instagram content that she had engaged with in the six months prior to her suicide.<sup>24</sup> Dramatisation of suicide was a prominent feature of this material, including graphic videos of suicide and self-harm set to music and TV-media.<sup>25</sup> Molly had also periodically attempted to contact social media influencers who raised suicide and self-harm themes in their content.<sup>26</sup> While much of the material Molly accessed was contrary to Instagram's guidelines, the latter material was considered to fall within them, a position that was criticised by the judge at the subsequent inquest on the

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<sup>13</sup>Molly Rose Foundation (2025).

<sup>14</sup>Ibid; see also Crawford (2023).

<sup>15</sup>Molly Rose Foundation (2025).

<sup>16</sup>Marchant et al. (2017); see also Crawford (2023).

<sup>17</sup>Molly Rose Foundation (2025), p. 3.

<sup>18</sup>Ibid, p. 12. Coroner Andrew Walker ruled that Molly "died from an act of self-harm whilst suffering from depression and the negative effects of on-line content".

<sup>19</sup>Ibid, p. 12.

<sup>20</sup>Milmo (2022).

<sup>21</sup>North London Coroner's Service (2022), p.5.

<sup>22</sup>Milmo (2022).

<sup>23</sup>North London Coroner's Service (2022), p.4.

<sup>24</sup>Molly Rose Foundation (2025), p. 12.

<sup>25</sup>Milmo (2022).

<sup>26</sup>Ibid; see also Milmo (2022).

basis that a user of Molly's age would struggle to contextualise such stories.<sup>27</sup>

Ian Russell, Molly's father, campaigned successfully for the encouragement of self-harm offence that would become s184 OSA 2023, discussed in the next section,<sup>28</sup> and her case was cited by Chris Philp, then Minister for Technology and the Digital Economy, when discussing duties regarding suicide and self-harm content.<sup>29</sup> The Online Harms White Paper<sup>30</sup> and report of the Joint Committee on the Draft Online Safety Bill<sup>31</sup> similarly stated that prevention of harms in cases such as Molly's is a fundamental goal of the legislation. The Joint Committee in particular found, by reference to Molly's case, that suicide and self-harm material on websites was "far more dangerous when served up automatically, proactively, and repeatedly by the recommender systems of platforms popular with young people".<sup>32</sup> A consensus emerged in early literature on this subject concerning the 'contagion effect' whereby children and teenagers encounter harmful behaviours seen online and then upload content emulating such behaviours.<sup>33</sup> Studies have demonstrated a correlation between suicidal or self-harming behaviour in under-18s and the contagion effect phenomenon.<sup>34</sup>

While the contagion effect provides an adequate starting point, studies of suicidal and self-harm ideation provide a more nuanced understanding of how these harmful patterns of behaviour arise on user-to-user services, including social media platforms. There is now an established body of research concerning social media's facilitation of self-harm and suicidal ideation in children,<sup>35</sup> and the role of crude recommender-algorithms in this process is now better understood.<sup>36</sup> One area of developing study is 'suicide-sensationalism' which concerns the particular contribution to users' suicidal ideation of video and image-sharing media. This phenomenon, which is also observable in traditional media,<sup>37</sup> is associated with the engagement-excitement-compulsion cycle typical of social media platforms.<sup>38</sup> Digital platforms encourage users' engagement by creating a cycle of consumption and production of media using varied stimuli that can become compulsive, which – when a crude recommender algorithm is operating – results in the promotion of depressive, suicide and self-harm content. Similar, social media systems operate social reward systems, such as 'view' and 'like' counters, that – when applied crudely – capture depressive, suicide and self-harm content.<sup>39</sup>

It is now recognised that, without effective regulation, visceral depressive posting on social media, including acts of self-harm, is likely to be promoted, while posting discouraging such acts and encouraging cognition and other healthy strategies

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<sup>27</sup>Milmo (2022).

<sup>28</sup>House of Lords, House of Commons (2021).

<sup>29</sup>Digital, Culture, Media and Sport Committee (2022), Q307.

<sup>30</sup>Department of Culture Media and Sport & Home Office (2020), p.19.

<sup>31</sup>House of Lords, House of Commons (2021).

<sup>32</sup>Ibid, p.95.

<sup>33</sup>Marchant et al. (2017), p. 22; Bell & Westoby (2025), p. 4.

<sup>34</sup>See eg Sedgwick et al. (2019).

<sup>35</sup>Marchant et al. (2017).

<sup>36</sup>Molly Rose Foundation (2025), p. 7; House of Lords, House of Commons (2021), para 322.

<sup>37</sup>Thom (2011).

<sup>38</sup>Liu et al. (2020).

<sup>39</sup>Ibid.

to manage suicidality and depression, is less likely to be as high profile.<sup>40</sup> For certain users who are most susceptible, the effect of such unregulated algorithms is to create a spiral whereby intensely bleak and depressive content that complements ideation is normalised.<sup>41</sup> Additionally, when users upload and share their experiences this can reinforce sense-memories of previous acts of self-harm or attempted suicide.<sup>42</sup> Poorly moderated social media is therefore capable of both spreading and *distilling* harmful, depressive content for users who engage in it, and thus of creating not only an unrelentingly negative online suicide and self harm 'culture' but also one that is algorithmically tailored towards the extreme.<sup>43</sup> It should be noted that this spreading and distilling effect extends beyond the image/video itself to comments left by users.<sup>44</sup>

In addition to emotive content that normalises suicidality and depressive feelings in victims, unregulated social media content can encompass practical and emotional support for those who are actively contemplating self-harm or suicide.<sup>45</sup> Digital media-use by suicide and self-harm attempters is characterised by practical content, such as discussion of methods of self-harm, as well as content designed to motivate contemplating users to implement such methods. Individuals who are contemplating or practicing have been found to upload, comment on and repost planned or completed acts of self-harm or attempted suicide.<sup>46</sup> One recent study identifies a three-stage process for attempters: firstly, selection and retention of practical information and emotive quotes and slogans; secondly, reproduction of such information in comments and reposts and, finally, posting designed to increase attempters' resolve to complete the self-harm or suicide attempt, such as discussing a specific action plan.<sup>47</sup> The latter stage has the strongest correlation with an attempt,<sup>48</sup> in contrast to more discursive posting. This suggests a flaw in the approach to suicide and self harm content in current OfCom guidelines that are weighted towards graphic text/images associated with normalising the emotional basis of suicide rather than the latter content which is most proximately associated with self harm and suicide.<sup>49</sup> The harms associated with the reproduction stage are also poorly reflected in current guidance, which encourages companies to treat such posting merely as a content violation, rather than as an opportunity for intervention, such as referral to protective content, such as the Samaritans.<sup>50</sup> It should be noted that a nuanced approach to such content is required, however, as the sharing of experiences by survivors in a manner that provides no practical or emotional support to those actively contemplating has been shown to correlate with a diminution in self harm and suicide attempts.<sup>51</sup>

Another problem with current guidance is that the relationship between suicide

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<sup>40</sup>Molly Rose Foundation (2025).

<sup>41</sup>Marchant et al. (2017), p. 14.

<sup>42</sup>Liu et al. (2020), p. 8.

<sup>43</sup>Bell & Westoby (2025), pp.4-5, 7-8.

<sup>44</sup>Ibid.

<sup>45</sup>O'Connor & Kirtley (2018).

<sup>46</sup>Liu et al. (2020), p.7; Sueki (2015).

<sup>47</sup>Liu et al. (2020), p.8.

<sup>48</sup>Ibid.

<sup>49</sup>Ofcom (2025a), p. 42.

<sup>50</sup>Ofcom (2025a), p. 42.

<sup>51</sup>Liu et al. (2020), p.1

and self-harm and related online harms is poorly understood.<sup>52</sup> For example, child engagement with mental health information undergoes a similar toxic spiral to the one detailed above for depressive suicide and self-harm ideation and often runs alongside specifically self-harm and suicide-related posting.<sup>53</sup> Such engagement may involve discussion of mental health topics, particularly depression and anxiety, as well as discussion of self-destructive behaviours, such as sexting and alcohol or drug misuse.<sup>54</sup> Users engaging in such behaviour, who are not already involved in posting self-harm and suicide related media, have been shown to become more susceptible to suicide or self-harm ideation.<sup>55</sup>

In addition to the self-harm, suicide and mental health-related online content, there are two significant background factors that facilitate ideation and attempts: immaturity and isolation. As regards the former, suicide and self-harm content on various sites and social media platforms has a greater impact on underage or emotionally immature children.<sup>56</sup> Posting about depressive topics is capable of having a particularly harmful impact on such users.<sup>57</sup> Furthermore, content addressing such content that may otherwise be beneficial for mature children and adults, such as stories of recovery, may be harmful for such users. In relation to the other factor, isolation, immersion in digital media has been demonstrated to retard the development of pro-social behaviours and to encourage anti-social ones.<sup>58</sup> The impact of such immersion on the sharp increase in children and teenagers, reporting that they suffer from loneliness, is well documented.<sup>59</sup> Loneliness is closely associated with higher than average engagement with online services including social media and is a significant factor contributing to suicidal ideation and attempt.<sup>60</sup> Relatedly, algorithmic processes can undermine the development of strategies for successful social interactions concerning complex depressive topics, so that a user who appears socially well adjusted, may – in relation to certain such topics – be further discouraged from discussing them with off-line friends or family.<sup>61</sup>

In addition to the harmful patterns of digital media-use detailed above, the positive impact of protective discourse facilitated by online activities should be recognised.<sup>62</sup> For example, targeted interventions by mental health workers working with platform moderators, have been shown to be capable of countering suicide and self harm ideation.<sup>63</sup> Similarly, more discursive platforms, such as suicide and self harm forums, on which the typical discourse is in a longer, text-based format, have also been shown to be beneficial, particularly when combined with effective moderation.<sup>64</sup> Such messaging has been shown to be capable of fostering “hope, recovery, and well-

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<sup>52</sup>Ofcom (2025a), p. 42.

<sup>53</sup>Molly Rose Foundation (2025).

<sup>54</sup>Liu et al. (2020), p.6.

<sup>55</sup>Ibid.

<sup>56</sup>Gannon et al. (2025).

<sup>57</sup>Garg & Singh (2025), p. 51.

<sup>58</sup>Ibid.; see also Uhls et al. (2014).

<sup>59</sup>Yang & Crespi (2025), pp. 7, 27.

<sup>60</sup>Mikuska et al. (2020); Yang & Crespi (2025), p. 7.

<sup>61</sup>Molly Rose Foundation (2025).

<sup>62</sup>European Parliament (2023), p.7.

<sup>63</sup>Bell & Westoby (2025), p. 7.

<sup>64</sup>Ibid, p. 7.

being”.<sup>65</sup> The potential utility of permitting users to continue to post such material was raised by Adam Mosseri, the CEO of Instagram, in response to Molly Russell’s case.<sup>66</sup> However, the policing of the distinction between protective suicide or self-harm discourse in the digital media, and harmful sensationalist content, requires effective moderation and a detailed understanding of user-behaviour. On image-based platforms that are more susceptible to sensationalism, such as Instagram, this challenge is particularly acute. Moderators typically have limited knowledge or direct experience of the mental health context of self-harm or suicidal ideation and attempt related content on their platforms, especially if the moderation is partially or wholly automated. Therefore, even when a platform has guidelines in place and has curated its algorithm to avoid promoting dangerous content, the actual experience of the platform for users is not dissimilar from the relatively unregulated one that of previous generations of users, such as Molly Russell.

### Illegal Content Duties

The OSA imposes illegal content duties – which came into force in March 2025 - on services that are within the scope of the Act; that includes so-called user-to-user services. It is irrelevant that a company running the services is based outside the UK so long as it has links to the UK due to the number of UK users (s4 OSA). As of March 2025, Ofcom has the power to issue fines of up to £18 million or 10% of a company’s global revenue, as mentioned above, if companies fail to discharge their illegal content duties, and can also seek court orders to block access to illegal sites within the UK.<sup>67</sup> The illegal content Codes are also in force.<sup>68</sup>

‘Illegal content’ is defined in s59(2) as content amounting to a ‘relevant offence’;<sup>69</sup> if no such offence applies to particular content, even if it could be harmful to children, it either falls entirely outside the scheme, or, depending on its nature, it could be covered by the legal but harmful provisions applying only to under-18s, not adults, discussed in Section 4. Under section 192 services must find illegality if they have ‘reasonable grounds to infer’ that the elements of the relevant offence are made out – in this case, offences relating to aiding/encouraging suicide and self-harm. That means that the tech company’s moderators, usually automated systems, must consider whether, as a reasonable inference, based on the nature of the content on the platform, the *actus reus* and *mens rea* elements of the relevant offence appear to be present.<sup>70</sup> Moderators must also determine whether a defence to the offence, if any, appears to be present.<sup>71</sup> If one or more of the elements of the offence in question do not appear to be present – ie the content, even if potentially harmful to children, does not appear to fall within the offence in question, and/or a defence does appear to be present, the content must be deemed legal and therefore no

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<sup>65</sup>Ibid, p. 7.

<sup>66</sup>Marsh & Waterson (2019).

<sup>67</sup>See the Introduction for further detail as to enforcement methods.

<sup>68</sup>See: Ofcom (2025e); Ofcom (2025f).

<sup>69</sup>S.59(4), (5).

<sup>70</sup>Section 192(6)(b) OSA.

<sup>71</sup>Section 192(5), (6)(a).

response is needed to it from the service in terms of the illegal content duties. If the content, however, is deemed to be illegal and is also listed as priority illegal content (PIC) in Schedule 7 OSA it should be prevented from appearing on the service or, if that safeguard fails, the period of time for which it is present should be minimised (ss10 and 27 OSA).

For the purposes of this article the relevant offences are, firstly, the new offence of encouraging serious self-harm introduced under the OSA s184. It covers content encouraging or assisting serious self-harm with intent to do so.<sup>72</sup> S184 covers a range of online content, going well beyond self-harm or suicide sites, and it ‘does not matter whether the content of the communication or publication is created by the defendant (so for example, in the online context, the offence under this section may be committed by forwarding another person’s direct message or sharing another person’s post)’ (s184(7)). It also covers (s184(8)) communications consisting of or including a hyperlink to other content, where the content can be accessed directly via the hyperlink. But service providers themselves fall outside s184 (sub-section 10). Secondly, there is also the offence of encouraging or assisting suicide *if* intending to so encourage or assist suicide or an attempt at suicide; that was already an offence pre-OSA under s2 Suicide Act 1961 and s13 Criminal Justice Act (Northern Ireland) 1966. These offences are deemed by the OSA to cover priority illegal content – PIC. Therefore, content falling within those offences would count as PIC for the purposes – in theory - of triggering the relevant, quite stringent duties of service providers.

But there are obvious problems with this illegal content scheme relating to suicide and self-harm sites or other inducements via online content to commit self-harm or suicide. Clearly, tech company moderators, usually automated systems, are not well equipped to detect the *mens rea* elements of these offences since usually they are reliant on detecting illegality based on the content of a communication alone. They may be able to identify content based on the *actus reus* of these offences, but services are likely to be finding leeway currently to maintain that the *mens rea* element was not clearly present or could not be identified. In relation to s.184, in some very clear-cut instances of encouragement to self-harm that element of intent could be inferred to be present, from the content, but in less obvious but still persuasive instance it might appear to an automated moderation system that the intention element was absent.

A service could also argue that the communication in question was merely exploring the issue of self-harm or suicide and reporting on it: the provider might concede that negligence or recklessness as to encouraging the acts in question might be found, but not intention. Or a service provider could argue that the self-harm depicted was not clearly ‘serious’ enough to fall within the s184 offence. The result, therefore, in a number of instances, is likely to be that content of this nature, although identified in various studies as harmful to under-18s – and sometimes most harmful to younger teenagers – could remain available to them online.

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<sup>72</sup> A person (D) commits an offence if—(a) D does a relevant act capable of encouraging or assisting the serious self-harm of another person, and (b) D’s act was intended to encourage or assist the serious self-harm of another person’. The ‘relevant act’ includes ‘sends, transmits or publishes a communication by electronic means’. Serious self-harm amounts to GBH within the meaning of the Offences Against the Person Act 1861, and in Scotland, severe injury. Cumulative acts of self-harm can reach that threshold, in combination.

Aside from the problems of identifying illegality discussed, enforcement is also complex due to jurisdictional issues, since many of these sites are hosted outside the UK and also use anonymity tools. However, the fact that user-to-user services and search services are outside the UK does not necessarily mean that they are not regulated under the OSA.<sup>73</sup> While some such sites covered by the OSA have blocked UK users, they may still be accessible via VPNs, leading to calls from organisations representing the families of victims for faster and more decisive action from Ofcom.<sup>74</sup> Some services are banning content relating to suicide or self harm under their own terms of service, even where the content is probably not illegal. Facebook (Meta), for example, states that it explicitly prohibits material that encourages or promotes suicide, self-injury, or eating disorders under its Community Standards. While the platform allows users to discuss these topics to raise awareness or seek support, it states that it removes content that encourages, provides instructions for, or celebrates these acts. Clearly, however, these claims are sometimes open to doubt: the child-protective safety tools in question may not be as effective as the company in question claims.<sup>75</sup>

Further, it is already apparent that some services are not complying with this scheme, or not complying fully, in relation to curbing online encouragement to commit suicide or to self-harm, although following pressure from Ofcom, some such sites have "voluntarily" restricted access for UK users to comply with the Act via geo-blocking. In April 2025, Ofcom launched its first investigation under the OSA into an unnamed, US-hosted pro-suicide forum linked to over 50 UK deaths. In February 2026 Ofcom found provisionally that the site was breaching its duties in relation to the site.<sup>76</sup> Ofcom found: 'Last year, the forum implemented a 'geoblock' in response to our enforcement proceedings against it, to restrict access by people with UK IP addresses. However, after a period of monitoring the service, we became concerned that the block was ineffective and/or was not consistently maintained, and continued to a provisional breach decision as a result'.

An alternative possibility arises of addressing the problems arising due to the nature of the sites in question, or other posts in various respects encouraging self-harm or promoting suicide. If, due to the problem of identifying the *mens rea* elements of the offence in question, for the purpose of triggering the illegal content duties, those duties are evaded by some companies, duties arising under the legal but harmful provisions applying to under-18s could be relied on instead. Since they

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<sup>73</sup>They are regulated if they have links with the UK. This means that the service has a significant number of UK users, *or* UK users form one of the, or the only, target market(s) for the service (OSA, s.4(5)(a)-(b)) *or* the service is capable of being used in the UK by individuals, *and* there are reasonable grounds to believe that there is a material risk of significant harm to individuals in the UK due to the user-generated content of the service or the search content of the service (whichever is applicable) (OSA, s.4(6)(a)-(b)(i),(ii)).

<sup>74</sup>In particular, the Molly Rose Foundation (2025) has repeatedly been 'highly critical of Ofcom's deeply unambitious approach to implementing the Online Safety Act'. It stated: 'These findings [see note 5 above] both justify and increase our concern, with Ofcom's current set of measures poorly placed to respond to the scale at which children were being exposed to harmful content and the potential effects of cumulative harm'.

<sup>75</sup>Research has found that child-protective safety tools, such as age verification and content filters, often fall short of company claims due to ineffective enforcement, algorithmic failures, and rapid technological changes. See.

<sup>76</sup>On 27 February 2026 (Ofcom (2026a)).

do not rely on identifying content as *illegal*, it appears at face value that these provisions could, to an extent, address this problem, although the problems of enforcement discussed would still arise. The application of the legal but harmful provisions are discussed and criticised in the next section, below.

### The ‘Legal but Harmful’ Scheme applying to Children

The legal but harmful provisions divide content into primary priority content (PPC) and priority content (PC); the duties are more stringent in relation to primary priority content (ss12 and 29).<sup>77</sup> Such content is covered by s61 OSA. Sub-sections 61(3) and (4) cover content aimed at under-18s which ‘encourages, promotes or provides instructions’ for suicide or for an act of deliberate self-injury. As of July 2025, when those aspects of the OSA came into force, platforms became legally required to use age assurance to prevent children from accessing this content. Services likely to be accessed by children must – if the scheme is taken at face value - take strict, proactive measures to prevent users under 18 from encountering this "primary priority content". Duties in relation to PPC include enforcing highly effective age assurance (verification or estimation) in order to block access, or prohibiting such content entirely from appearing in their terms of service (s12(3)(a)).<sup>78</sup> Services must clearly define in their terms how they prevent children from accessing this content and enforce these policies consistently.<sup>79</sup> In relation to PC services only have a duty to ‘protect’ children from encountering the content. The codes (Ofcom’s Children’s Safety Codes of Practice, published April 2025) set out how platforms can reduce toxic algorithms which can recommend harmful content to children without them seeking it out. This includes ensuring that algorithms do not operate in a way that harms children, by guiding them to content related to suicide and self-harm.

But s61 is badly drafted: it appears that, in order to fall within the scope of the provisions of s61, the content, under s.61(6), must consist of ‘text only’ or consist of text accompanied by ‘identifying content which consists only of text’, a GIF, ‘emoji or other symbol’. If those words were taken at face value they could be found by moderators to mean that sites/content encouraging suicide or serious self-harm, consisting only of images with no accompanying text, or of both images and text, are excluded from the primary priority content category. That would be a very strange situation, given that images may be more compelling and emotive than text but might equally or more probably create the effects of contagion. The relevant research tends

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<sup>77</sup>Services have a duty (s12(3)): to operate a service using proportionate systems and processes designed to—

- (a) prevent children of any age from encountering, by means of the service, primary priority content that is harmful to children;
- (b) protect children in age groups judged to be at risk of harm from other content that is harmful to children (or from a particular kind of such content) from encountering it by means of the service.

<sup>78</sup>See: Ofcom (2025g) p.57: “The provider should include the following in the terms of service: a) provisions specifying how children in the United Kingdom are to be protected from content that is harmful to children.”

<sup>79</sup>Ibid, p.57-58.

to focus more emphatically on images as opposed to text.<sup>80</sup> There is therefore an apparent mismatch between research into links between encountering online content relating to suicide or self-harm and engaging in such behaviours which does not appear to focus mainly on text,<sup>81</sup> and the designations of content as ‘primary priority content’ (PPC) or ‘priority content’ (PC), given that the duties arising in relation to content in the former category are more likely to prevent under-18s encountering it. However, the wording of s61(6) is misleading and should be re-drafted. Section 236(1) of the Act defines content as ‘anything communicated by means of an internet service, whether publicly or privately. That includes text *and* images.

Thus a communication, due to the poor drafting of s61(6), might be found by automated systems, depending on their programming, to fall outside ss61(3) and (4). That might also arise on the basis that the content is not found to encourage, promote or provide instructions for suicide or deliberate self-injury, on the basis that the content is indirect and subtle; it could be viewed as merely discussing these issues, bearing in mind that automated systems as moderators may fail to detect more indirect forms of persuasion. Moreover, s61 speaks of ‘content’; it does not mention recommender algorithms guiding children towards such content.

If for one of these reasons content was found by automated moderation systems to fall out of the higher PPC category, it could still, in some instances, be caught by the relevant priority content (PC) provisions, under s62. However, the provisions in question under s62 are not as precise as might have been expected and provide further scope for the tech companies to find that the content fell outside the categories, requiring, therefore, no response in terms of removal of the images and other content. The harms in question include under s62(6)(b) depicting ‘the real or realistic serious injury of a person in graphic detail’. Obviously, such images may depict a range of injuries that are *not* self-inflicted; therefore, this provision is not closely linked to the problem of encouraging self-harm. A service might further argue that the detail was not graphic enough to be covered.

Section 62(9) further covers ‘content which encourages a person to ingest, inject, inhale or in any other way self-administer: (a) ‘a physically harmful substance’; (b) ‘a substance in such a quantity as to be physically harmful’. Section 62(9) therefore covers encouragement to cause harm to oneself by ingesting something harmful, but *not* by other means, such as by wrist-cutting. Common forms of self-injury include cutting, severe scratching, burning, and banging or hitting; most individuals who self-injure have used more than one method. But encouragement to use these common forms lies outside s62(9).

Section 62 therefore does not expressly cover sites or content generally promoting suicide or self-harm, unless the specific content falls within s62(6) or (9). That omission may have arisen on the basis of the presence of the new offence mentioned above in the OSA, s184, of encouraging or assisting serious self-harm with intent to do so. But if that offence or the offences in relation to encouraging or aiding suicide were not deemed applicable, for the reasons discussed above, the provider would not be affected by the illegal content provisions. Given the narrow wording of s62(6) or (9), the duties arising in relation to legal but harmful priority content might be

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<sup>80</sup>See: Susi et al. (2023).

<sup>81</sup>Ibid.

susceptible to avoidance by the service as well.

If relevant content falls, or appears to fall, just outside the scope of the relevant offences, it would not, as discussed, count as ‘illegal content’. But, as discussed, such material may, for various reasons, also fall outside the two categories of ‘primary priority content’ or ‘priority content’. It could still possibly be covered as ‘non-designated content that is harmful to children’,<sup>82</sup> and therefore would be covered by the less demanding age-group dependent duties.<sup>83</sup> Section 234(2) defines harm as “physical or psychological harm”, while section 234(3) explains that harm includes harm arising from the nature of the content, the fact of its dissemination, or the manner of its dissemination. Section 234(4) includes cumulative harm arising from repeated content encounters. On that basis content linked to encouraging suicide or self-harm that is not deemed to be primary priority content but is still harmful, on the bases discussed in Section 2, could fall within these provisions and children should be protected from it if an age group deemed to be at risk, under s12(9)(c). However, those provisions leave some loopholes open that services may be able to exploit. Children need only be protected from the content, not prevented from encountering it. The likelihood that it would be removed swiftly from a service is probably low, if the content is not found to be within the primary priority or priority category, and could in any event be disregarded if targeting certain age groups deemed to be at low risk of harm. In some instances, of discussions of suicide or self-harm, including more subtle inducements to engage in that behaviour, automated systems might not pick up the more nuanced albeit harmful content, finding that it was not covered at all. Further, services only need to use ‘proportionate’ means to address content harmful to children; smaller companies might argue that resource constraints mean that at present they need to focus on addressing PIC or PPC; or they might argue that at present they are technologically unable to detect PC or unspecified harmful content.

For all the reasons discussed, there are very clear gaps in this highly significant aspect of the OSA scheme – since especially harmful content is at stake - for the protection of children online via addressing legal but harmful content. There is also, clearly, the question of Ofcom’s willingness or ability to use its available sanctions against non-compliant service providers, which is open to doubt, partly because the scheme in general relies heavily on enforcement by a regulator that is under-funded as compared with the services it is regulating.

Ofcom has shown some awareness of these problems; in June 2025 it published the ‘Additional Safety Measures’ consultation,<sup>84</sup> which sets out proposals to ask platforms to go further to keep users safe. These include proposals that some service providers should assess whether proactive technology to detect certain kinds of content is available and meets specific criteria. This includes technology to detect illegal suicide content, and suicide and self-harm content which is harmful to children. Ofcom states: ‘Where such tools exist, they should use them’. They should also, Ofcom recommends, enable real-time reporting of livestreams showing imminent harm, and ensure human moderators are available when livestreaming is active, and design and operate their recommender systems so that content likely to

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<sup>82</sup>OSA, s.60(4) which refers to s.60(2)(c).

<sup>83</sup>It falls within OSA, s.12(3) (user-to-user services) or s.29(3) (search services); see also s12(9)(c).

<sup>84</sup>Ofcom (2026b).

be certain kinds of priority illegal content, (including illegal suicide-related content) is excluded from users' feeds. Ofcom also proposed the expanded use of proactive technologies, such as hash matching to block known illegal images, and automated tools to detect harms, including illegal suicide content. It also proposed to address repeat offending through new user sanctions.

The Samaritans responded, commenting that content related to suicide or self-harm should be treated as in the highest risk category for content, requiring the swiftest response from the companies. They also pointed out: 'Panel members had highlighted that the most valuable improvement to the reporting system would be better feedback on what actions have been taken in response to a report, or, where no action is taken, a clear explanation of why. This would help users understand how decisions are made and reinforce confidence in the platform's moderation processes'. They also criticized the use of automated systems alone to flag and take down content related to suicide and self-harm on the basis that such systems 'cannot capture the emotional tone, urgency, or complexity of such situations. Human moderators should therefore be supported by trained mental health or crisis support staff in cases where potential suicide or self-harm risk is identified'.<sup>85</sup> However, whether from Ofcom or the Samaritans organisation, these are only proposals at present and they are not at present backed up by statutory powers.

## Conclusions

The Online Safety Act 2023 was introduced amid claims that it creates a world-leading child-protective model. But the interrogation of the OSA in terms of the harms with which this article is concerned that it is claimed to address indicates that practice as between the various companies is very variable, and that not all are fully compliant with the scheme opposing online encouragement of suicide and serious self-harm in under-18s.<sup>86</sup>

The leeway created, as discussed, for evasion of the illegal content duty in relation to encouraging suicide and self-harm also, it is concluded, undermines the duties pertaining to similar legal but harmful content in relation to under-18s, which could potentially cover certain postings or sites, where they were found to fall outside the illegal content duty. It was found above that relying on the relevant existing offences to identify illegal content for content removal purposes is open to criticism since the mens rea elements may not appear to be present in instances of more subtle encouragement to commit suicide or to self-harm. So there is a case for simply designating the content that should be removed, as occurs under the legal but harmful scheme, which obviously does not rely on existing offences. Or, preferably, it should be prevented from appearing at all – without involving such reliance.

Further, some content encouraging suicide or self-harm may not be found to be illegal as discussed, but may also fall outside s61(3) or (4) OSA. If so, the legal but

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<sup>85</sup>Ofcom (2026c).

<sup>86</sup>Those findings are backed by recent research; see eg, Rahman-Jones & McMahon (2025). "The testing, by child safety groups and cyber researchers, found 30 out of 47 safety tools for teens on Instagram were "substantially ineffective or no longer exist".

harmful scheme only requires that children should be protected from it if it then falls within s62 as PC only. But ss12 and 29 do not mandate that PC should be prevented from appearing on the service, and does not specify that it is only allowed to appear on the service for a minimal amount of time – as is the case for PPC. Even if some services do remove PC content at some point, relating to depictions of serious self-injury of a person in graphic detail or content encouraging ingestion of a harmful substances, such content removal is in any event not very effective in terms of protecting children from the online harms discussed here. Apart from the possibility of evasion of those subsections by some services on the basis that their automated systems did not find that they applied, once children have viewed the content, the psychological damage may well have been done, even if the content is subsequently removed.

This article concludes with some recommendations for development and reform of the OSA regime in relation to online encouragement of suicide and self-harm in children. Alternatives to content removal are however in general unsuitable for use in relation to children since they rely on an evaluation of risk by the child themselves. They include: user Empowerment Tools (Opt-in Filters); instead of platforms blanket-removing content, they are required to provide users with tools to control their own experience. This allows users to filter out content they do not wish to see. To achieve this, platforms can provide "mute," "block," or "hide" functionalities that empower users to customize their feed. These include options to mute keywords, hide non-verified accounts, or opt-out of certain algorithmic recommendations. However, this alternative is not of great value in relation to the content with which this article is concerned for obvious reasons, in relation to children; the same can be said of labelling in the sense of applying warning labels to content that has been flagged as possibly but not clearly illegal (due to the difficulty of identifying the presence of the *mens rea* elements); since users can click through to view it, its efficacy is diminished in the context with which this article is concerned since a significant number of users are still likely to view it.

A further possibility that could be somewhat more effective is to engage in demotion/reduced reach, meaning that services reduce the visibility of content via algorithms (for example, News 11.1.25: shadowbanning or limiting the reach in feeds). As a concomitant to this possibility Ofcom could place a greater focus on the ways that algorithms promote or amplify harmful content. So doing could run alongside content removal by "de-prioritising" it in user feeds. One possibility – of pertinence in the context covered by this article - would be to amend the OSA to provide that if an automated system flags the content as satisfying the actus reus of one of the offences discussed above in Section 3, it should then be de-prioritised, even if not removed. Under Article 25 Digital Services Act (DSA), platforms cannot use, design, or operate interfaces that manipulate, deceive, or substantially impair a user's ability to make free and informed choices. Such 'dark patterns' are understood in the DSA's Recitals to be techniques that 'materially distort or impair... the ability of recipients... to make autonomous and informed choices'. This article has mentioned the addictive features of the platforms, but also algorithmic recommenders guiding children to content linked to suicide or self-harm. Expressly banning addictive features and such recommender algorithms, due to an OSA amendment, echoing the DSA model to an extent, would clearly be a significant reform, especially in the context covered by this article.

This article has argued that the OSA scheme intended to protect children from

content advocating suicide or self-harm is flawed in a range of respects. In a few years time it may become more readily apparent, as Ofcom concludes various investigations into company practice, that, while well-intentioned to an extent, the scheme is largely unable to deliver on the promises in relation to such protection which accompanied its introduction. The government launched an investigation in March 2026 into the child-protective measures stemming from the OSA; its findings may also be of value in future in judging the efficacy of the current scheme.<sup>87</sup> The recommendations for future reforms of the OSA made here, and those recently made by Ofcom, discussed above, could have some effect in ameliorating the position under the OSA scheme, as it currently stands. But at present the findings of this article concur with the calls for the strengthening of the OSA in relation to protection of children from the online harms discussed, coming from, among others, Molly Russel's father after she killed herself, having visited a number of suicide-promoting sites.<sup>88</sup> The UK government has stated recently that it intends to bring forward legislation in late 2026 to ban under-16s from social media, covering certain large social media sites, which may be in force by Spring 2027. But even if that occurs, it would not address all the harms discussed here because, leaving aside the likelihood that some children will be able to circumvent the ban, it would not catch all the sites promoting suicide or self-harming in children, since they are not social media platforms.<sup>89</sup>

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<sup>87</sup>Department of Science, Innovation and Technology (2026).

<sup>88</sup>See: Kuenssberg (2025).

<sup>89</sup>Snapchat, TikTok, YouTube, Instagram, Facebook and X are to be covered, but the ban will probably cover some other large platforms deemed social media ones.

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