

1 **Online Suicide and Self-harming Communications:** 2 **providing Protection for Children under Online** 3 **Regulation?** 4

5 *Online content promoting suicide and self-harm has been found by a number of*
6 *researchers to be a major and rising concern for users aged 13-17, on the basis*
7 *of finding a correlation between suicidal or self-harming behaviour in under-18s*
8 *and visiting sites depicting images of self-harm and suicide, accompanied by text*
9 *advocating or promoting such activity. Ofcom has found that age is a risk factor:*
10 *the risk of encountering and being influenced by such content increases with the*
11 *age of children and teenagers. Further, those with existing mental health*
12 *challenges may be more likely to engage with this content, and self-harming*
13 *behaviour or suicidal ideation may therefore increase. Children and teenagers,*
14 *the Ofcom Report pointed out, are also more susceptible to a contagion effect than*
15 *adults: they are more likely to imitate behaviours encountered online and give in*
16 *to impulse. The Online Safety Act 2023 (OSA) in the UK was introduced partly to*
17 *address the harm to under-18s created by the presence and influence of self-harm*
18 *and suicide sites/communications by creating a regulatory regime covering in-*
19 *scope online services, such as Facebook, Instagram, X, TikTok, on which such*
20 *content may appear, and be promoted by recommender algorithms. This article*
21 *will critically examine the efficacy of the OSA in relation specifically to regulation*
22 *via content moderation and other methods of protecting children from harm*
23 *caused by encountering such content online, concluding that the OSA regime in a*
24 *range of respects is proving to be ineffective. This article will focus most closely*
25 *on the legal but harmful scheme under the OSA aimed at under-18s, not adults,*
26 *in relation to curbing the harm caused by content encouraging children to engage*
27 *in self-harm or suicide.*
28

29 **Introduction** 30

31
32 Online content promoting suicide and self-harm has been found by a number
33 of researchers to be a major and rising concern for users aged 13-17, on the basis of
34 finding a correlation between suicidal or self-harming behaviour in under-18s and
35 visiting sites/pages presenting text and images promoting self-harm and suicide
36 accessible by children.¹ In particular, content promoting self-harm and suicide has
37 been found by Ofcom to be a particular concern in relation to that age group; its
38 2025 Report found that 30 per cent of persons within that age group had seen or
39 heard of primary priority content including self-harm and suicide.² Ofcom has found
40 that age is a risk factor: the risk of encountering such content increases with the age

¹The Molly Rose Foundation (2025) 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: <https://mollyrosefoundation.org/wp-content/uploads/2025/10/Harmful-ContentBriefing-1.pdf>.

²See Ofcom (2025b), p. 85.

1 of children and teenagers.³ Ofcom has also found that a number of deaths in the UK
2 have been linked with online material where detailed information is shared on
3 methods of suicide and self-harm, or where suicidal and self-harm behaviours are
4 actively encouraged.⁴ It further found that children may encounter such content
5 accidentally or have it recommended to them by algorithms. Its 2024 Report
6 suggested that four per cent of UK internet users have seen online content promoting
7 suicide in the last month, and children are more likely to see it than adults.

8 The Online Safety Act 2023 (OSA) was introduced in order to address a range
9 of online harms created by content on various online services, such as Facebook,
10 Instagram, Snapchat, X, TikTok, but in particular those affecting children, one of the
11 main reasons given for its introduction.⁵ To further that aim the OSA includes
12 offences linked to suicide and self-harm as priority illegal content, and also creates
13 a legal but harmful scheme aimed only at under-18s, not adults, which specifically
14 singles out sites and processes encouraging self-harm or suicide in that age group.
15 This article will focus most closely on that legal but harmful scheme in relation to
16 curbing the harm caused by sites and processes, such as recommender algorithms,
17 encouraging children directly or indirectly to engage in self-harm or suicide. It sets
18 out to critically examine the efficacy of the OSA in relation specifically to regulation
19 via content moderation and other methods of protecting children from harm caused
20 by encountering such sites and content, concluding that the regime in a range of
21 respects is proving to be ineffective.

22 23 24 **Harms caused by suicide and self-harm in social media**

25
26 The perception that social media contributed to serious self-harm and suicide
27 among children was a key reason for the introduction of the OSA.⁶ The Molly Rose
28 Foundation, whose recommendations informed the OSA, argue that the exposure of
29 children to self-harm and suicide content on social media is not merely incidental or
30 transient, but is rather a pervasive aspect of the business model of social media
31 platforms.⁷ This is so, because social media, unlike traditional media, has limited
32 editorial control over content production and dissemination, and therefore allows
33 harmful user-generated content to spread.⁸ Poorly moderated social media is
34 demonstrably capable of immersing vulnerable children in a culture of self-harm
35 and suicide,⁹ and of contributing to pro-self-harm and pro-suicide ideation and
36 motivation, as discussed below.¹⁰ Both of the latter was evident from the inquest
37 into the suicide of Molly Russell, a fourteen year-old who killed herself after

³Ofcom (2025c), p. 50: ‘Research indicates that the risk of encountering this content online increases with children’s age’.

⁴Ofcom (2025d).

⁵OSA, s1(3)(b)(i).

⁶House of Lords, House of Commons (2021).

⁷Molly Rose Foundation (2025).

⁸Ibid; see also Crawford (2023).

⁹Molly Rose Foundation (2025).

¹⁰Marchant et al. (2017); see also Crawford (2023).

1 becoming immersed in suicide and self-harm content on Instagram.¹¹ The judge
2 found that social media had significantly contributed to Molly's suicide, singling
3 out Instagram's recommendation-algorithm as a substantial factor in confirming her
4 depressive suicidal ideation.¹² While a causal link between any specific images and
5 engaging in serious self-harm was not found, it was established that Instagram's
6 algorithm contributed to Molly becoming overwhelmed with thoughts of ending her
7 life.¹³

8 Molly Russell's case provides an effective illustration of the harms of online
9 platforms. Molly began posting on Instagram when she was twelve, contrary to the
10 terms of service,¹⁴ as Instagram lacked age-verification screening at the time,¹⁵ and
11 by the time of her suicide had amassed hundreds of hours browsing, commenting
12 and messaging on the platform. While maintaining an outward appearance of
13 normality to her family, she had, in the six months prior to her suicide, begun to
14 withdraw from offline social relationships and spent a significant amount of her free
15 time on Instagram and other online platforms.¹⁶ This time was, unbeknownst to her
16 family and offline friends, devoted in part to accessing unnuanced pro-self harm and
17 suicide content,¹⁷ which formed thirteen percent of the over sixteen thousand pieces
18 of Instagram content that she had engaged with in the six months prior to her
19 suicide.¹⁸ Dramatisation of suicide was a prominent feature of this material,
20 including graphic videos of suicide and self-harm set to music and TV-media.¹⁹
21 Molly had also periodically attempted to contact social media influencers who
22 raised suicide and self-harm themes in their content.²⁰ While much of the material
23 Molly accessed was contrary to Instagram's guidelines, the latter material was
24 considered to fall within them, a position that was criticised by the judge on the basis
25 that a user of Molly's age would struggle to contextualise such stories.²¹

26 Ian Russell, Molly's father, campaigned successfully for the encouragement of
27 self-harm offence that would become s184 OSA 2023, discussed in the next
28 section,²² and her case was cited by Chris Philp, then Minister for Technology and
29 the Digital Economy, when discussing duties regarding suicide and self-harm
30 content.²³ The Online Harms White Paper²⁴ and report of the Joint Committee on
31 the Draft Online Safety Bill²⁵ similarly stated that prevention of harms in cases such
32 as Molly's is a fundamental goal of the legislation. The Joint Committee in
33 particular found, by reference to Molly's case, that suicide and self-harm material

¹¹Molly Rose Foundation (2025), p. 3.

¹²Ibid, p. 12.

¹³Ibid, p. 12.

¹⁴Milmo (2022).

¹⁵North London Coroner's Service (2022), p.5.

¹⁶Milmo (2022).

¹⁷North London Coroner's Service (2022), p.4.

¹⁸Molly Rose Foundation (2025), p. 12.

¹⁹Milmo (2022).

²⁰Ibid; see also Milmo (2022).

²¹Milmo (2022).

²²House of Lords, House of Commons (2021).

²³Digital, Culture, Media and Sport Committee (2022), Q307.

²⁴Department of Culture Media and Sport & Home Office (2020), p.19.

²⁵House of Lords, House of Commons (2021).

1 on websites was “far more dangerous when served up automatically, proactively,
 2 and repeatedly by the recommender systems of platforms popular with young
 3 people”.²⁶ The phenomenon of children, like Molly, having their self-harm and
 4 suicidal ideation facilitated by social media is an emerging area of study and the link
 5 between such use and self-harm is increasingly well-documented,²⁷ with the role of
 6 recommender-algorithms, in particular, now recognised for their substantial
 7 contribution to these harms on certain platforms.²⁸ A prevalent, though simplistic,
 8 understanding of the relationship has been termed the ‘contagion effect’ whereby
 9 children and teenagers encounter harmful behaviours seen online and then upload
 10 content emulating such behaviours.²⁹ Studies have demonstrated a correlation
 11 between suicidal or self-harming behaviour in under-18s and the contagion effect
 12 phenomenon.³⁰

13 While the contagion effect provides an adequate starting point, studies of suicidal
 14 and self-harm ideation provide a more nuanced understanding of how these harmful
 15 patterns of behaviour arise on social media platforms. One area of developing study
 16 is ‘suicide-sensationalism’ which concerns the particular contribution to users’
 17 suicidal ideation of video and image-sharing media. This phenomenon, which is also
 18 observable in traditional media,³¹ is associated with the engagement-excitement-
 19 compulsion cycle typical of social media platforms.³² Social media platforms
 20 encourage users’ engagement by creating a cycle of consumption and production of
 21 media using varied stimuli that can become compulsive; in particular, as regards posts
 22 with emotional triggers relevant to depression, suicide and self-harm, the use of
 23 recommender-algorithms to direct users towards such content. This results in such
 24 content receiving greater engagement than less emotive content, and this greater
 25 engagement is presented to the poster of it as a social ‘reward’, typically in the form
 26 of ‘view’ and ‘like’ counters.³³ Thus, visceral depressive posting, including acts of
 27 self-harm, are promoted, while posting discouraging such acts and encouraging
 28 cognition and other strategies for overcoming depression, may receive less attention
 29 and be demoted.³⁴ For users caught in this spiral, the intensely bleak and depressive
 30 content that complements ideation becomes normalised.³⁵ Additionally, suicide-
 31 sensationalism is capable of motivating suicide/self-harm by reinforcing sense-
 32 memories of previous acts of self-harm or attempts when users upload and share their
 33 experiences and by creating a sense of competition for attention.³⁶ Poorly moderated
 34 social media is therefore capable of both spreading and *distilling* harmful,
 35 depressive content for users who engage in it, and thus of creating not only an
 36 unrelentingly negative online suicide and self harm ‘culture’ but also one that is

²⁶Ibid, p.95.

²⁷Marchant et al. (2017).

²⁸Molly Rose Foundation (2025), p. 7; House of Lords, House of Commons (2021), para 322.

²⁹Marchant et al. (2017), p. 22; Bell & Westoby (2025), p. 4.

³⁰See eg Sedgwick et al. (2019).

³¹Thom (2011).

³²Liu et al. (2020).

³³Ibid.

³⁴Molly Rose Foundation (2025).

³⁵Marchant et al. (2017), p. 14.

³⁶Liu et al. (2020), p. 8.

1 algorithmically tailored towards the extreme.³⁷ It should be noted that this spreading
2 and distilling effect extends beyond the image/video itself to comments left by
3 users.³⁸

4 In addition to extreme depressive suicidal ideation, suicidal attempts are
5 encouraged by self-harm and suicide media.³⁹ Social media-use by suicide and self-
6 harm attempters is characterised by practical content, such as discussion of methods
7 of self-harm, as well as content designed to motivate users to implement such
8 methods; the latter includes uploading, commenting on and reposting attempts.⁴⁰
9 One recent study identifies a three-stage process for attempters: firstly, selection and
10 retention of practical information and emotive quotes and slogans; secondly,
11 reproduction of such information in comments and reposts and, finally, posting
12 designed to increase attempters' resolve to complete the self-harm or suicide attempt,
13 such as discussing a specific action plan.⁴¹ The latter stage has the strongest
14 correlation with an attempt⁴² in contrast to more discursive posting, indicating a flaw
15 in the approach to suicide and self-harm content in current guidelines that are weighted
16 towards graphic text/images.⁴³ The harms associated with the reproduction stage are
17 also poorly reflected in current guidance, which encourages companies to treat such
18 posting merely as a content violation when it should be recognised as a valid sharing
19 of an experience,⁴⁴ but should be accompanied by referral to protective content,
20 such as the Samaritans.⁴⁵

21 Another problem with current guidance is that the relationship between suicide
22 and self-harm and related online harms is poorly understood.⁴⁶ For example, child
23 engagement with mental health information undergoes a similar toxic spiral to the
24 one detailed above for depressive suicide and self-harm ideation and often runs
25 alongside specifically self-harm and suicide-related posting.⁴⁷ Such engagement
26 may involve direct discussion of mental health topics, particularly depression and
27 anxiety, as well as, more indirectly, mental health-related discussion of self-
28 destructive behaviours, such as sexting and alcohol or drug misuse.⁴⁸ Users
29 engaging in such behaviour, who are not already involved in posting self-harm and
30 suicide related media, have been shown to become more susceptible to suicide or
31 self-harm ideation.⁴⁹

32 In addition to the self-harm, suicide and mental health-related content, there are
33 two significant background factors that facilitate ideation and attempts: immaturity
34 and isolation. As regards the former, suicide and self-harm content on social media

³⁷Bell & Westoby (2025), pp.4-5, 7-8.

³⁸Ibid.

³⁹O'Connor & Kirtley (2018).

⁴⁰Liu et al. (2020), p.7; Sueki (2015).

⁴¹Liu et al. (2020), p.8.

⁴²Ibid.

⁴³Ofcom (2025a), p. 42.

⁴⁴Liu et al. (2020), p.1

⁴⁵Ofcom (2025a), p. 42.

⁴⁶Ofcom (2025a), p. 42.

⁴⁷Molly Rose Foundation (2025).

⁴⁸Liu et al. (2020), p.6.

⁴⁹Ibid.

1 platforms has a greater impact for underage or emotionally immature children.⁵⁰
 2 Posting about depressive topics is capable of having a particularly harmful impact
 3 on emotionally immature users.⁵¹ Furthermore, content addressing such content that
 4 may otherwise be beneficial for mature children and adults, such as stories of
 5 recovery, may be harmful for such users. In relation to the other factor, isolation,
 6 social media has been demonstrated to retard the development of pro-social
 7 behaviours and to encourage anti-social ones.⁵² The impact of social media on the
 8 sharp increase in children and teenagers reporting that they suffer from loneliness is
 9 well documented.⁵³ Loneliness is closely associated with higher than average
 10 engagement with social media and is a significant factor contributing to ideation and
 11 attempt.⁵⁴ Relatedly, algorithmic processes can undermine the development of
 12 strategies for successful social interactions concerning complex depressive topics,
 13 so that a user who appears socially well adjusted, may – in relation to certain
 14 depressive topics – be further discouraged from engaging.⁵⁵

15 In addition to the harmful patterns of social media-use detailed above, the
 16 positive impact of protective discourse facilitated by social media platforms should
 17 be recognised.⁵⁶ For example, targeted interventions by mental health workers
 18 working with platform moderators, has been shown to be capable of countering
 19 suicide and self harm ideation.⁵⁷ Similarly, more discursive social media platforms
 20 such as suicide and self harm forums, on which the typical discourse is in a longer,
 21 text-based format, have also been shown to be beneficial, particularly when combined
 22 with effective moderation.⁵⁸ Such messaging has been shown to be capable of
 23 fostering “hope, recovery, and well-being”.⁵⁹ The potential utility of permitting
 24 users to continue to post such material was raised by Adam Mosseri, the CEO of
 25 Instagram, in response to Molly Russell’s case.⁶⁰ However, the policing of the
 26 distinction between protective suicide or self-harm discourse on social media, and
 27 harmful sensationalist content, requires effective moderation and a detailed
 28 understanding of user-behaviour. On image-based platforms that are more susceptible
 29 to sensationalism, such as Instagram, this challenge is particularly acute. Such
 30 platforms, when moderated by individuals with limited knowledge or direct
 31 experience of the mental health context to self-harm or suicidal ideation and
 32 attempts, especially if the moderation is partially or wholly via algorithm, should be
 33 considered to be high-risk for child users.

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⁵⁰Gannon et al. (2025).

⁵¹Garg & Singh (2025), p. 51.

⁵²Ibid.; see also Uhls et al. (2014).

⁵³Yang & Crespi (2025), pp. 7, 27.

⁵⁴Mikuska et al. (2020); Yang & Crespi (2025), p. 7.

⁵⁵Molly Rose Foundation (2025).

⁵⁶European Parliament (2023), p.7.

⁵⁷Bell & Westoby (2025), p. 7.

⁵⁸Ibid, p. 7.

⁵⁹Ibid, p. 7.

⁶⁰Marsh & Waterson (2019).

1 **Illegal Content duties**

2
3 The OSA imposes illegal content duties – which came into force in March 2025
4 - on services that are within the scope of the Act; that includes so-called user-to-
5 user services. It is irrelevant that a company running the services is based outside
6 the UK so long as it has links to the UK due to the number of UK users. As of March
7 2025, Ofcom has the power to issue fines of up to £18 million or 10% of a company's
8 global revenue, if companies fail to discharge their illegal content duties, and can
9 also seek court orders to block access to illegal sites within the UK.⁶¹ The illegal
10 content Codes are also in force.⁶²

11 'Illegal content' is defined in s59(2) as content amounting to a 'relevant
12 offence';⁶³ if no such offence applies to particular content, even if it could be
13 harmful to children, it either falls entirely outside the scheme, or, depending on its
14 nature, it could be covered by the legal but harmful provisions applying only to
15 under-18s, not adults, discussed in Section 4. Under section 192 services must find
16 illegality if they have 'reasonable grounds to infer' that the elements of the relevant
17 offence are made out – in this case, offences relating to aiding/encouraging suicide
18 and self-harm. That means that the tech company's moderators, usually automated
19 systems, must consider whether, as a reasonable inference, based on the nature of
20 the content on the platform, the *actus reus* and *mens rea* elements of the relevant
21 offence appear to be present.⁶⁴ Moderators must also determine whether a defence
22 to the offence, if any, appears to be present.⁶⁵ If one or more of the elements of the
23 offence in question do not appear to be present – ie the content, even if potentially
24 harmful to children, does not appear to fall within the offence in question, and/or a
25 defence does appear to be present, the content must be deemed legal and therefore
26 no response is needed to it from the service. If the content, however, is deemed to
27 be illegal and is also listed as priority illegal content (PIC) in Schedule 7 OSA it
28 should be prevented from appearing on the service or, if that safeguard fails, the
29 period of time for which it is present should be minimised (ss10 and 27 OSA).

30
31 For the purposes of this article the relevant offences are, firstly, the new offence
32 of encouraging serious self-harm introduced under the OSA s184. It covers content

⁶¹Ofcom 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 ss144-148 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 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. Section 110 creates criminal offences, pursuant to s109, 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 ss111-113.

⁶²See: Ofcom (2025e); Ofcom (2025f).

⁶³S.59(4), (5).

⁶⁴Section 192(6)(b) OSA.

⁶⁵Section 192(5), (6)(a).

1 encouraging or assisting serious self-harm with intent to do so.⁶⁶ S184 covers a
2 range of online content, going well beyond self-harm or suicide sites, and it ‘does
3 not matter whether the content of the communication or publication is created by
4 the defendant (so for example, in the online context, the offence under this section
5 may be committed by forwarding another person’s direct message or sharing
6 another person’s post)’ (s184(7)). It also covers (s184(8)) communications
7 consisting of or including a hyperlink to other content, where the content can be
8 accessed directly via the hyperlink. But service providers themselves fall outside
9 s184 (sub-section 10). Secondly, there is also the offence of encouraging or assisting
10 suicide *if* intending to so encourage or assist suicide or an attempt at suicide; that
11 was already an offence pre-OSA under s2 Suicide Act 1961 and s13 Criminal
12 Justice Act (Northern Ireland) 1966. These offences are deemed by the OSA to
13 cover priority illegal content – PIC. Therefore, content falling within those offences
14 would count as PIC for the purposes – in theory - of triggering the relevant, quite
15 stringent duties of service providers.

16 But there are obvious problems with this illegal content scheme relating to
17 suicide and self-harm sites or other inducements via online content to commit self-
18 harm or suicide. Clearly, tech company moderators, usually automated systems, are
19 not well equipped to detect the mens rea elements of these offences since usually
20 they are reliant on detecting illegality based on the content of a communication
21 alone. They may be able to identify content based on the actus reus of these
22 offences, but services are likely to be finding leeway currently to maintain that the
23 mens rea element was not clearly present or could not be identified. Obviously in
24 some clear-cut instances that element could be inferred, but, since under the OSA
25 scheme all the elements of an offence must appear to be present on the reasonable
26 inference test, if the mens rea element may be absent, the content is likely to be
27 adjudged legal, requiring no action from the service provider.

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

36 Aside from the problems of identifying illegality discussed, enforcement is also
37 complex due to jurisdictional issues, as many of these sites are hosted outside the
38 UK and use anonymity tools. While some sites have blocked UK users, they may
39 still be accessible via VPNs, leading to calls from organisations representing the

⁶⁶ 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.

1 families of victims for faster and more decisive action from Ofcom.⁶⁷ Some services
 2 are banning content relating to suicide or self harm under their own terms of service,
 3 even where the content is probably not illegal. Facebook (Meta), for example, states
 4 that it explicitly prohibits material that encourages or promotes suicide, self-injury,
 5 or eating disorders under its Community Standards. While the platform allows users
 6 to discuss these topics to raise awareness or seek support, it states that it removes
 7 content that encourages, provides instructions for, or celebrates these acts. Clearly,
 8 however, these claims are sometimes open to doubt: the child-protective safety tools
 9 in question may not be as effective as the company in question claims.⁶⁸

10 Further, it is already apparent that some services are not complying with this
 11 scheme, or not complying fully, in relation to curbing online encouragement to
 12 commit suicide or to self-harm, although following pressure from Ofcom, some
 13 such sites have "voluntarily" restricted access for UK users to comply with the Act
 14 via geo-blocking. In April 2025, Ofcom launched its first investigation under the
 15 OSA into an unnamed, US-hosted pro-suicide forum linked to over 50 UK deaths.
 16 In February 2026 Ofcom found provisionally that the site was breaching its duties
 17 in relation to the site.⁶⁹ Ofcom found: 'Last year, the forum implemented a
 18 'geoblock' in response to our enforcement proceedings against it, to restrict access
 19 by people with UK IP addresses. However, after a period of monitoring the service,
 20 we became concerned that the block was ineffective and/or was not consistently
 21 maintained, and continued to a provisional breach decision as a result'.

22 An alternative possibility arises of addressing the problems arising due to the
 23 nature of the sites in question, or other posts in various respects encouraging self-
 24 harm or promoting suicide. If, due to the problem of identifying the mens rea
 25 elements of the offence in question, for the purpose of triggering the illegal content
 26 duties, those duties are evaded by some companies, duties arising under the legal
 27 but harmful provisions applying to under-18s could be relied on instead. Since they
 28 do not rely on identifying content as *illegal*, it appears at face value that these
 29 provisions could, to an extent, address this problem, although the problems of
 30 enforcement discussed would still arise. The application of the legal but harmful
 31 provisions are discussed and criticised in the next section, below.

34 **The 'legal but harmful' scheme applying to children**

35
 36 The legal but harmful provisions divide content into primary priority content
 37 (PPC) and priority content (PC); the duties are more stringent in relation to primary

⁶⁷In 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 1 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'.

⁶⁸Research 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:.

⁶⁹On 27 February 2026 (Ofcom (2026a)).

1 priority content (ss12 and 29).⁷⁰ Such content is covered by s61 OSA. Sub-sections
 2 61(3) and (4) cover content aimed at under-18s which ‘encourages, promotes or
 3 provides instructions’ for suicide or for an act of deliberate self-injury. As of July
 4 2025, when those aspects of the OSA came into force, platforms became legally
 5 required to use age assurance to prevent children from accessing this content.
 6 Services likely to be accessed by children must – if the scheme is taken at face value
 7 - take strict, proactive measures to prevent users under 18 from encountering this
 8 "primary priority content". Duties in relation to PPC include enforcing highly
 9 effective age assurance (verification or estimation) in order to block access, or
 10 prohibiting such content entirely from appearing in their terms of service
 11 (s12(3)(a)).⁷¹ Services must clearly define in their terms how they prevent children
 12 from accessing this content and enforce these policies consistently.⁷² In relation to
 13 PC services only have a duty to ‘protect’ children from encountering the content.
 14 The codes (Ofcom’s Children’s Safety Codes of Practice, published April 2025) set
 15 out how platforms can reduce toxic algorithms which can recommend harmful
 16 content to children without them seeking it out. This includes ensuring that
 17 algorithms do not operate in a way that harms children, by guiding them to content
 18 related to suicide and self-harm.

19 But s61 is badly drafted: it appears that, in order to fall within the scope of the
 20 provisions of s61, the content, under s.61(6), must consist of ‘text only’ or consist
 21 of text accompanied by ‘identifying content which consists only of text’, a GIF,
 22 ‘emoji or other symbol’. If those words were taken at face value they could be found
 23 by moderators to mean that sites/content encouraging suicide or serious self-harm,
 24 consisting only of images with no accompanying text, or of both images and text,
 25 are excluded from the primary priority content category. That would be a very
 26 strange situation, given that images may be more compelling and emotive than text
 27 but might equally or more probably create the effects of contagion. The relevant
 28 research tends to focus more emphatically on images as opposed to text.⁷³ There is
 29 therefore an apparent mismatch between research into links between encountering
 30 online content relating to suicide or self-harm and engaging in such behaviours
 31 which does not appear to focus mainly on text,⁷⁴ and the designations of content as
 32 ‘primary priority content’ (PPC) or ‘priority content’ (PC), given that the duties
 33 arising in relation to content in the former category are more likely to prevent under-
 34 18s encountering it. However, the wording of s61(6) is misleading and should be
 35 re-drafted. Section 236(1) of the Act defines content as ‘anything communicated by

⁷⁰Services 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.

⁷¹See: 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.”

⁷²Ibid, p.57-58.

⁷³See: Susi et al. (2023).

⁷⁴Ibid.

1 means of an internet service, whether publicly or privately. That includes text *and*
2 images.

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

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

22 Section 62(9) further covers ‘content which encourages a person to ingest,
23 inject, inhale or in any other way self-administer: (a) ‘a physically harmful
24 substance’; (b) ‘a substance in such a quantity as to be physically harmful’. Section
25 62(9) therefore covers encouragement to cause harm to oneself by ingesting
26 something harmful, but *not* by other means, such as wrist-cutting or hanging.
27 Section 62 does not expressly cover sites or content generally promoting suicide or
28 self-harm, unless the specific content falls within s62(6) or (9). That omission may
29 have arisen on the basis of the presence of the new offence mentioned above in
30 OSA, s184, of encouraging or assisting serious self-harm with intent to do so. But
31 if that offence or the offences in relation to encouraging or aiding suicide were not
32 deemed applicable, for the reasons discussed above, the provider would not be
33 affected by the illegal content provisions. Given the narrow wording of s62(6) or
34 (9), the duties arising in relation to legal but harmful priority content might be
35 susceptible to avoidance by the service as well.

36 If relevant content falls, or appears to fall, just outside the scope of the relevant
37 offences, it would not, as discussed, count as ‘illegal content’. But, as discussed,
38 such material may, for various reasons, also fall outside the two categories of
39 ‘primary priority content’ or ‘priority content’. It could still possibly be covered as
40 ‘non-designated content that is harmful to children’,⁷⁵ and therefore would be
41 covered by the less demanding age-group dependent duties.⁷⁶ Section 234(2)
42 defines harm as "physical or psychological harm", while section 234(3) explains
43 that harm includes harm arising from the nature of the content, the fact of its
44 dissemination, or the manner of its dissemination. Section 234(4) includes

⁷⁵ OSA, s.60(4) which refers to s.60(2)(c).

⁷⁶ It falls within OSA, s.12(3) (user-to-user services) or s.29(3) (search services); see also s12(9)(c).

1 cumulative harm arising from repeated content encounters. On that basis content
2 linked to encouraging suicide or self-harm that is not deemed to be primary priority
3 content but is still harmful, on the bases discussed in Section 2, could fall within
4 these provisions and children should be protected from it if an age group deemed to
5 be at risk, under s12(9)(c). However, those provisions leave some loopholes open
6 that services may be able to exploit. Children need only be protected from the
7 content, not prevented from encountering it. The likelihood that it would be
8 removed swiftly from a service is probably low, if the content is not found to be
9 within the primary priority or priority category, and could in any event be
10 disregarded if targeting certain age groups deemed to be at low risk of harm. In some
11 instances, of discussions of suicide or self-harm, including more subtle inducements
12 to engage in that behaviour, automated systems might not pick up the more nuanced
13 albeit harmful content, finding that it was not covered at all. Further, services only
14 need to use ‘proportionate’ means to address content harmful to children; smaller
15 companies might argue that resource constraints mean that at present they need to
16 focus on addressing PIC or PPC; or they might argue that at present they are
17 technologically unable to detect PC or unspecified harmful content.

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

25 Ofcom has shown some awareness of these problems; in June 2025 it published
26 the ‘Additional Safety Measures’ consultation,⁷⁷ which sets out proposals to ask
27 platforms to go further to keep users safe. These include proposals that some service
28 providers should assess whether proactive technology to detect certain kinds of
29 content is available and meets specific criteria. This includes technology to detect
30 illegal suicide content, and suicide and self-harm content which is harmful to
31 children. Ofcom states: ‘Where such tools exist, they should use them’. They should
32 also, Ofcom recommends, enable real-time reporting of livestreams showing
33 imminent harm, and ensure human moderators are available when livestreaming is
34 active, and design and operate their recommender systems so that content likely to
35 be certain kinds of priority illegal content, (including illegal suicide-related content)
36 is excluded from users’ feeds. Ofcom also proposed the expanded use of proactive
37 technologies, such as hash matching to block known illegal images, and automated
38 tools to detect harms including illegal suicide content. It also proposed to address
39 repeat offending through new user sanctions.

40 The Samaritans responded, commenting that content related to suicide or self-
41 harm should be treated as in the highest risk category for content, requiring the
42 swiftest response from the companies. They also pointed out: ‘Panel members had
43 highlighted that the most valuable improvement to the reporting system would be
44 better feedback on what actions have been taken in response to a report, or, where
45 no action is taken, a clear explanation of why. This would help users understand

⁷⁷ Ofcom (2026b).

1 how decisions are made and reinforce confidence in the platform’s moderation
 2 processes’. They also criticized the use of automated systems alone to flag and take
 3 down content related to suicide and self-harm on the basis that such systems ‘cannot
 4 capture the emotional tone, urgency, or complexity of such situations. Human
 5 moderators should therefore be supported by trained mental health or crisis support
 6 staff in cases where potential suicide or self-harm risk is identified’.⁷⁸ However,
 7 whether from Ofcom or the Samaritans organisation, these are only proposals at
 8 present and they are not at present backed up by statutory powers.

11 Conclusions

13 The Online Safety Act 2023 was introduced amid claims that it creates a world-
 14 leading child-protective model. But the interrogation of the OSA in terms of the
 15 harms with which this article is concerned that it is claimed to address indicates that
 16 practice as between the various companies is very variable, and that not all are fully
 17 compliant with the scheme opposing online encouragement of suicide and serious
 18 self-harm in under-18s.⁷⁹

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

30 Further, some content encouraging suicide or self-harm may not be found to be
 31 illegal as discussed, but may also fall outside s61(3) or (4) OSA. If so, the legal but
 32 harmful scheme only requires that children should be protected from it if it then falls
 33 within s62 as PC only. But ss12 and 29 do not mandate that PC should be prevented
 34 from appearing on the service, and does not specify that it is only allowed to appear
 35 on the service for a minimal amount of time – as is the case for PPC. Even if some
 36 services do remove PC content at some point, relating to depictions of serious self-
 37 injury of a person in graphic detail or content encouraging ingestion of a harmful
 38 substances, such content removal is in any event not very effective in terms of
 39 protecting children from the online harms discussed here. Apart from the possibility
 40 of evasion of those sub-sections by some services on the basis that their automated
 41 systems did not find that they applied, once children have viewed the content, the

⁷⁸Ofcom (2026c).

⁷⁹ 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”.

1 psychological damage may well have been done, even if the content is subsequently
2 removed.

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

20 A further possibility that could be somewhat more effective is to engage in
21 demotion/reduced reach, meaning that services reduce the visibility of content via
22 algorithms (for example, News 11.1.25. shadowbanning or limiting the reach in
23 feeds). As a concomitant to this possibility Ofcom could place a greater focus on the
24 ways that algorithms promote or amplify harmful content. So doing could run
25 alongside content removal by "de-prioritising" it in user feeds. One possibility – of
26 pertinence in the context covered by this article – would be to amend the OSA to
27 provide that if an automated system flags the content as satisfying the actus reus of
28 one of the offences discussed above in Section 3, it should then be de-prioritised,
29 even if not removed.

30 This article has argued that the OSA scheme intended to protect children from
31 content advocating suicide or self-harm is flawed in a range of respects. In a few
32 years time it may become more readily apparent, as Ofcom concludes various
33 investigations into company practice, that, while well-intentioned to an extent, the
34 scheme is largely unable to deliver on the promises in relation to such protection
35 which accompanied its introduction. The government launched an investigation in
36 March 2026 into the child-protective measures stemming from the OSA; its findings
37 may also be of value in future in judging the efficacy of the current scheme.⁸⁰ The
38 recommendations for future reforms of the OSA made here, and those recently made
39 by Ofcom, discussed above, would have some effect in ameliorating the position
40 under the OSA scheme, as it currently stands. But at present the findings of this
41 article concur with the calls for the strengthening of the OSA in relation to protection
42 of children from the online harms discussed, coming from, among others, Molly
43 Russel's father after she killed herself, having visited a number of suicide-promoting
44 sites.⁸¹

⁸⁰Department of Science, Innovation and Technology (2026).

⁸¹See: Kuenssberg (2025).

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