IET response to the Ofcom consultation on Online Safety - Additional Safety Measures

About the Institution of Engineering and Technology (IET)

The IET is a trusted adviser of independent, impartial, evidence-based engineering and technology expertise. We are a registered charity and one of the world's leading professional societies for the engineering and technology community with over 155,000 members worldwide in 148 countries. Our strength is in working collaboratively with government, industry and academia to engineer solutions for our greatest societal challenges. We believe that professional guidance, especially in highly technological areas, is critical to good policy making. For further details on the evidence submitted, please contact policy@theiet.org.

Executive Summary

The Institution of Engineering and Technology (IET) welcomes the opportunity to respond to Ofcom's consultation on user-to-user interaction under the Online Safety Act (OSA). The IET commends the progress made already by Ofcom whilst implementing the OSA, while reiterating the urgent need for immersive technologies to be treated as a distinct area of regulatory focus due to the unique risks they pose to children and vulnerable users. Drawing on the expertise of our members, we outline the challenges of age verification, the prevalence of unsupervised minors in virtual reality (VR) spaces, and the embodied nature of harm in these environments. We call for targeted action to ensure that immersive platforms are safe, transparent, and accountable, and that regulation continues to evolve in step with technological advancement and virtual reality. Despite its prevalence, virtual reality is still not explicitly addressed and remains a grey area, even though it was defined clearly as as content in the OSA.

Recommendations

- **Legislation:** The UK's OSA was a vital first step to help the UK manage technologies in a safe and regulated way. However, despite assurances that the OSA regulates to cover the metaverse, persistently, language around online safety is still too focussed on 2D interaction and not immersive behaviour. It is pivotal that further research is undertaken into immersive environments and the impact that this has for regulation. A review should be undertaken into the impact of the OSA on regulating immersive reality. (Source: The IET, Protecting children from harms online, 2024)**.**
- **Institutions:** Professional bodies should support Ofcom in ensuring compliance of metaverse providers. Providing a safe process for whistle blowers and responding meaningfully to user complaints (Source: The IET, Safeguarding the metaverse, 2022).
- **Choice and support:** Clear and accessible information, with an easy-to-use reporting and complaints processes, is essential to the success of protecting children from online harms (Source: The IET, Protecting children from harms online, 2024)**.**

Regulation in the Metaverse

It is important to highlight the growing challenges of regulating behaviour within virtual reality environments. While the OSA marked a substantial step forward in addressing digital harms, and despite ongoing efforts to address these challenges, significant gaps remain in its ability to protect users from exploitation and abuse. As immersive technologies become more common, the complexity of monitoring and enforcing standards in these spaces presents significant hurdles, especially when it comes to safeguarding children and vulnerable individuals online.

The metaverse offers a wide range of opportunities for users to benefit from immersive virtual environments such as simulating training in high-risk scenarios such as nuclear power plants. However, the consultation does not fully or explicitly address immersive reality, and as a result, industry requirements remain unclear. One of the most pressing challenges is age verification, which remains a critical vulnerability particularly in virtual reality, where extended user-to-user interactions can pose serious harms to these groups. When a user participates in virtual reality, the experience is

one not just of viewing, but of immersive interaction. As a result, the boundary between virtual and real-world interaction becomes blurred. The vast opportunity that virtual reality and the metaverse presents can only be captured if the safety, dignity and rights of end-users are protected.

While virtual reality is often perceived as a family entertainment device, most consumer headsets have a lower age limit of either 12 or 13. This is written into the manufacturer's terms and conditions, with the main route to enforcement being through the linking of the headset to an online account elsewhere in which the user's date of birth has already been required. There is consensus among industry experts and researchers that the lower age limit is not widely adhered to. IET research showed that 25% of children aged 5-13 are using virtual reality on a weekly basis, and that young peoples' engagement with VR had grown by 320% in 2022 (Source: E&T Magazine, Children spend more time online than in the real world, 2023).

The evidence gathered for the "Safeguarding the metaverse" report in 2022, highlighted that in multi-user virtual reality spaces that unsupervised children participated in openly accessed virtual reality spaces. This included under 13-year-olds and over 13-year-olds (the mandatory lower age limit for virtual users). In these spaces the authors met children that were as young as six, meaning that children are interacting with adult strangers. What makes this situation different to non-immersive media, such as chatrooms, is that virtual reality is embodied. Users can not only interact verbally, but also physically, which are represented by avatars. On VRChat, one of the most popular metaverse apps on the Meta Quest, avatar nudity was observed.

Research from the Centre for Countering Digital Hate (CCDH) shows that VRChat is "rife with abuse, harassment, racism and pornographic content". CCDH researchers found that users, including children, are on average exposed to abusive behaviour every seven minutes. Abusive behaviour recorded and reported by CCDH researchers included:

1. Exposure to graphic sexual content.

2. Bullying, sexual harassment and abuse of other users, including children.

3. Minors being told to repeat racist slurs and extremist talking points. (Source: The IET, Safeguarding the metaverse, 2022).

Conclusion

Immersive technologies are reshaping digital interaction, but without robust safeguards, they risk becoming environments that allow abuse and exploitation. The IET urges Ofcom to address virtual reality and the metaverse as critical areas for regulatory focus, particularly in regard to the safety of children and vulnerable people. Current documentation and reporting is not clear enough that content includes interaction in a virtual space. By clarifying legal responsibilities and supporting parents and users with accessible tools and information, we can promote a safer environment online.