

Reference: 02066312

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

11 September 2025

## Freedom of Information request: Right to know request

Thank you for your request for information about documents considering concerns about the Online Safety Act.

We received this request on 20 August 2025 and we have considered your request under the Freedom of Information Act 2000 (“the FOI Act”).

### Your request

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*“[...] I also find it astonishing that many critical issues, such as the risks to user privacy and data security, were not highlighted during the consultation period for the Online Safety Act. [...] please provide me, under the Freedom of Information Act, any communications, assessments, and reasoning regarding what concerns were considered and which were dismissed.”*

### Our response

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We consulted on our age assurance proposals and how we considered privacy, data protection and security. We received a range of stakeholder responses to the consultation related to risks, including user privacy and data security, which we responded to in full in our statement on [Age Assurance and Children’s Access](#) in January 2025 (starting from page 58). Privacy and data protection were also considered as part of our rights assessment for our protection of children codes, including those related to age assurance, in our [Protection of Children statement](#) in April 2025. You may also wish to refer to the Privacy and data protection section (pages 22-24) of our [Guidance on highly effective age assurance](#), from April 2025.

We also plan to publish a joint statement with the Information Commissioner’s Office (ICO) in the coming months, which will provide clarity to services on compliance with both UK online safety and data protection legislation in managing risks to children.

Turning to your request for “communications, assessments, and reasoning regarding what concerns were considered and which were dismissed”, we have interpreted this as relating to internal materials and consider that this request is too broad to fulfil under permitted FOI timescales.

Under Section 12 of the FOI Act Ofcom is not obliged to comply with a request for information if we estimate that the cost of complying with the request would exceed the ‘appropriate limit’. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (‘the Regulations’), and is, for Ofcom, £450. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour, which equates to 18 hours of time. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, identifying, locating, retrieving and extracting the information from any document containing it.

Even if we interpreted your request narrowly as referring to just the age assurance workstream, this team (as well as key directors, technologists and lawyers within the Online Safety Group) would have to search through their correspondence and documents for at least an hour per person to find any information in scope of your request. Given the volume of materials to search through and number of people that would need to conduct this search, Ofcom estimates that it would take over 18 hours to search for and identify the relevant information. As such the cost of complying with your request will exceed the appropriate limit. We have therefore been unable to fulfil your request taking into account section 12 of the FOI Act (which we set out above).

You can consider submitting a clearer, narrower request, for example by requesting information related to a specific period of time (e.g. a month or less) and a specific issue. We will consider any follow up request under the FOI Act, including whether any exemptions apply.

If you have any further queries, then please send them to [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk) – quoting the reference number above in any future communications.

Yours sincerely,

## Information Requests

### Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

### Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).