

The Rt. Hon the Baroness Stowell of Beeston
Chair, Communications and Digital Select
Committee
House of Lords, London, SW1A 0PW

Melanie Dawes
Chief Executive
ChiefExecutive@ofcom.org.uk

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Chi Onwurah MP
Chair, Science, Innovation and Technology
Committee
House of Commons, London, SW1A 0AA

Josh Simons MP
Chair, Digital Regulation and Responsibility
APPG
House of Commons, London SW1A 0AA

By email only

Online Safety

This letter is our latest update on Ofcom's implementation of the Online Safety Act (OSA), which received royal assent in late October 2023.

The Online Safety Act – overview

Many of today's most widely used and best-loved online services, including social media, photo and video-sharing services, instant messaging platforms and gaming, have created great benefits: the ability to share videos and photos from anywhere to anyone, new forms of community and instant interaction. But with these benefits come new risks of harm and illegality. These include the use of online services to enable child sexual exploitation and abuse; to disseminate terrorist content and incite hate; to commit fraud; or to allow children to seek or stumble upon content that may be harmful to them. Ofcom's research from 2023 has found that two-thirds of adults reported that they had seen or experienced one or more potential online harms in the past four weeks.¹ And while children benefit from the opportunities that technology offers, our research shows that most have encountered harmful content and activity online, which can have a serious impact on their physical and mental wellbeing. And as we sadly know, online activity can also be linked to fatal outcomes.

The Online Safety Act ('the Act') requires online services that host user-generated content, search services and pornography services to protect their users from illegal content, and in the case of children, from harmful content online. The Act places duties on companies to assess and manage safety risks arising from content and conduct on their sites and apps. It does not expect all harmful and illegal content to be eradicated online, but it does expect services to have suitable measures to keep adults and children in the UK safe.

While Ofcom's powers under the Act do not enable us to take down individual pieces of content, we will use our powers to protect adults and children by ensuring services take steps to keep people safe. Ultimately the Act is about driving services to prioritise safety in the design of their products and wider systems.

¹ Ofcom, [Online Nation 2023](#).

Our progress so far

Establishing detailed rules under the Act

Parliament set a clear priority for Ofcom in the Act to get the Illegal Harms Codes and Protection of Children Codes into force as quickly as possible. The Act set us a deadline of 18 months from Royal Assent – which means 26 April 2025 – to publish these Codes, as well as the guidance on Age Assurance for Porn Providers. We are on track to deliver this. Since the Act received royal assent, Ofcom has moved quickly to implement it:

- In November 2023, we launched a [consultation on Illegal Harms Codes and guidance](#) (closed in February 2024)
- In December 2023, we launched [a consultation on guidance for service providers publishing pornographic content](#) (closed in March 2024)
- In February 2024, we provided [advice to the Secretary of State on thresholds for categorised services](#). This built on research and a call for evidence that ran from June 2023 to January 2024. At the same time, we launched [a call for evidence on the additional duties for categorised services](#).
- In May 2024, we published our [consultation on Protection of Children Codes and guidance](#) (closed in July 2024)
- In July 2024, we published [consultations on transparency guidance and information gathering](#).
- Over 2023 and 2024, we have issued guidance to services on their responsibilities. This included our October 2023 [open letter to video-sharing platforms regarding the crisis in Israel and Gaza](#), and our August 2024 [open letter to online service providers about the increased risk of their platforms being used to stir up hatred, provoke violence and commit other offences under UK law](#), in the context of acts of violence in the UK over the summer.

The end of this year marks a turning point. In December we will publish the final rules on illegal harms and will be turning the spotlight on services: their duties will start to kick in from the new year, and we will expect them to act swiftly to deliver changes for users. Once the Codes are approved by Parliament, and have come into force, in the spring we will be able to enforce where companies do not take the necessary action. By the spring we will also have finalised the measures to protect children and published our final Protection of Children Codes of Practice, as well as finalised our guidance for providers of pornographic content.

We want companies to comply voluntarily, and we are pleased with the engagement we have had from many in the industry. But we are preparing now for enforcement action so that we can move quickly where it is needed and as soon as this is possible in 2025.

Industry supervision and preparations for enforcement

We have already established supervision teams made up of interdisciplinary experts who are developing deep understanding of a small number of particularly critical services. This includes large services with significant reach across the UK, and some smaller ones which are high-risk. The aim is to make sure that services understand their duties now; have plans in place for compliance next year; and have identified accountable senior staff. This proactive engagement will give us a head start in achieving early, concrete changes and identifying areas for further action, including potential early enforcement where this is needed.

Small but risky services

Our supervision teams are also crucial to how we propose to protect users from harmful content on **‘small but risky’** online services, which we know some stakeholders have concerns about. We are keenly aware that while these kinds of services may not have wide reach, small online services, especially those that host or promote the most harmful content, can represent a significant risk to UK users. Tackling these services is therefore a central part of our mission to make the UK public safer online.

The Act gives us significant flexibility to tailor the measures in our Codes to different kinds of services and our Codes will place the biggest requirements on the riskiest platforms. This means that large services, because they are widely used by adults and children across the UK, will need to do more. But we have explicitly designed the Codes so that even where they are small, high-risk services will need to use greater protections. For example, the strongest requirements to protect children – such as features that make it harder for perpetrators to contact children on services that pose a high risk of grooming, and hash matching technology on file-sharing services – will also apply to smaller but higher-risk services.

As the Codes evolve over time, we will consider where it is appropriate to target further measures at small but risky services. We also have flexible tools to identify, manage and enforce against non-compliance, which again we will target according to risk, not just size and scale. We can take enforcement action and levy fines, use our information powers and apply for business disruption measures in the most serious cases – and we won’t hesitate to use these tools where necessary.

More detail about our approach to small but risky services can be found in our [September 2024 letter to the Secretary of State for Science, Innovation and Technology](#).

Our approach to the Codes of practice

The Codes are the first step in driving the change we want to see in people’s experiences online – setting clear expectations about how platforms should address the risk of harm in their services against which Ofcom can hold platforms to account. Because it is a statutory regulatory process, the work required to develop the Codes is highly complex and detailed, and our timetable is rapid for something of this scale and novelty. We appreciate that some stakeholders, particularly smaller organisations, have found it challenging to engage with the comprehensive evidence and analysis that we needed to publish to explain our recommendations. We are very grateful, therefore, to the large number of stakeholders, including many Parliamentarians as well as campaigners and other experts, who have contributed, and who have read and responded to our consultations. Their input has been invaluable in allowing us to deliver the best possible first versions of the Codes, and it will be reflected in the final guidance and Codes we publish in December. We will keep trying to improve, by making our consultations as accessible as possible, and through clear communication, summaries and engagement.

In developing the Codes, we have conducted extensive engagement with children as well as parents, carers and professionals working with children. We heard from over 15,000 children about their lives online and spoke to over 7,000 parents to hear their views on how they feel our proposals will impact their experiences. We are working with the Children’s Commissioner and others to ensure that our final Children’s Codes next year can be understood by children themselves.

Key changes required by the Codes

Our immediate focus in year one is to drive change in the areas of greatest harm, especially to children. We are moving fastest where there are known solutions – such as hash-matching

technology to detect child sexual abuse content, and age assurance at 18 – which will have high impact when they are adopted at scale.

To this end, we have already set out an ambitious set of proposals which we expect will – once they are adopted – deliver a big improvement in online safety. This includes:

- Stronger governance and accountability with senior named individuals responsible for safety in every company and every app and site required to assess their risks;
- Highly effective age checks so that children do not stumble into porn and other content harmful to them;
- A big change in what under 18s see and experience on sites and apps – an end to suicide and self-harm material being fed to children; algorithms that do not amplify harm;
- Greater control for children over their online experience by, for example, by being able to indicate content that they don't want to see and what group chats they are included in, and easier reporting tools;
- For all users, effective and properly-resourced content moderation to tackle and take down illegal content such as illegal hate speech and terrorism;
- Use of “hash-matching” technology to detect and remove content known to contain child sexual abuse material;
- Protections for under 18s to keep their accounts private and prevent them being contacted and groomed by strangers;
- Exposure to fraudulent content reduced, so that it is harder for fraudsters to scam vulnerable users.

The Act is robust legislation. It is also extremely broad and ambitious, and we cannot mobilise every aspect of it with equal weight in year one. Our first Codes of Practice create a strong foundation, but they are just the starting point and we will continue to build upon them, including in response to evidence received through our consultations. That is why we have already decided to bring forward further proposals in spring 2025 to reinforce our first Codes. We also flagged in our consultation on the Children's Codes in May that we need to do more work in relation to both minimum age limits and how the risks affect children in particular age groups.

Speed and comprehensiveness are difficult to achieve together. We believe we are striking the right balance by setting a high early foundation upon which we will build over time.

What happens next

In **December 2024**, we will publish our Illegal Harms Codes. When they have completed the Parliamentary approval process this will mark a major milestone as the first Codes will “go live” and the illegal harms safety duties become enforceable. Our statement in December will also start the 3-month clock on companies' deadline for completing their illegal harms risk assessments, which they will have to finish by March 2025.

In **January 2025**, we will publish our children's access assessments guidance. All services must then carry out an assessment to determine if their service is likely to be accessed by children, which they must complete by April 2025. We will also publish our final Guidance on age assurance to prevent children from encountering pornographic material.

In **February 2025** we will publish draft guidance for consultation on protecting and empowering women and girls. This is several months earlier than our original timetable, and we have already started engagement on this with experts in the sector.

In **April 2025**, we will publish our Protection of Children Codes and children’s risk assessment guidance. Services likely to be accessed by children must then carry out a children’s risk assessment within three months, which means by July 2025. Again, when the Codes have completed the Parliamentary approval process the safety duties to protect children under the Act become enforceable.

In the spring, we will also publish a consultation on further proposals to strengthen the Codes after our first editions have come into force.

We have shifted the timing of our work on phase 3, which includes additional duties on categorised services. We sent the then-Secretary of State [our advice](#) on the thresholds for categorisation on 29 February 2024. The next stage is for Government to confirm the thresholds in secondary legislation, which we expect to take place by the end of 2024. We have also updated our plans to ensure we prioritise those areas where we believe we can have the greatest impact.

We think the requirements for public transparency from categorised platforms will be among the most effective tools we have for driving change. This will enable us to shine a light on platforms’ actions in public, and will provide hard evidence for the first time on the effectiveness of their safety measures. We are therefore prioritising this work in our roadmap by preparing to issue draft transparency notices just a few weeks after we publish the register of categorised services in summer 2025. We expect to see the first published transparency reports from categorised services, in response to our notices, around the **end of 2025**.

In parallel to this work to drive transparency, at around the same time we will also issue requests for information (‘RFIs’) to build the evidence base for our consultation on the additional duties that will apply to categorised services. These duties include giving users more tools to control what content they see, ensuring services apply their terms of service consistently (though we cannot set standards for what these terms are), protections for news publisher and journalistic content, and preventing fraudulent advertising. This marks a change from the approach we took to our previous consultations and reflects what we have learnt through the process so far– namely that without using information powers, our Codes and guidance are limited by what is available through research or published data. RFIs can also play an important role in ensuring our proposals are specific, targeted, and long-lasting. We were unable to use RFIs for the earlier Codes because of the accelerated timing of the first phases of our work, but we believe it would be a false economy not to use them to support the Codes for categorised services.

Taken together, these decisions add around six months to the process. Together with our decision to switch resource to a new consultation on additions to the illegal harms and protection of children Codes, and to accelerate the Guidance on the protection of women and girls, it means that we now expect to publish the consultation on the additional duties for categorised services by **early 2026**.

In addition, by **July 2025**, we will publish our report on researcher access. And by **December 2025**, we will publish our final Guidance on super-complaints.

All of our planned work over the coming months is set out in [the progress update published on our website](#).

The challenge ahead


Improving UK citizens’ online safety is one of the foremost policy challenges of our time. The sheer scale of harm means we must drive significant improvement from tech platforms over the next few years. It is imperative that services don’t wait – they can and must act now to ensure their users’ safety.

We are grateful for the huge amount of engagement we have had from many stakeholders and Parliamentarians, including the evidence and input we have received through our consultations. We cannot do this alone and we welcome your continued support in challenging the industry to do better.

I hope that this update – which we are publishing on our website – is helpful. We are happy to provide specific briefings as needed. I look forward, in particular, to supporting the work of the Select Committees and APPGs in this area.

I am copying this letter to the Secretary of State for Science, Innovation and Technology and to the Home Secretary.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Melanie Dawes', written in a cursive style.

Melanie Dawes