Paper to lie before both Houses of Parliament for a period of 40 days, during which time either House may resolve that the draft amendments to the code of practice be not approved.

Ofcom

Draft amendments (No. 2) to the Protection of Children Code of Practice for user-to-user services

Draft of amendments prepared under section 41 of the Online Safety Act 2023 and submitted to the Secretary of State in accordance with section 43(1) on 16 November 2026.

Paper to lie before both Houses of Parliament for a period of 40 days, during which time either House may resolve that the draft amendments to the code of practice be not approved.

Office of Communications

Draft amendments (No. 2) to the Protection of Children Code of Practice for user-to-user services

Presented to Parliament pursuant to section 43(2) of the Online Safety Act 2023

November 2026

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1. Preamble

1.1 On 4 July 2025 Ofcom issued the Protection of Children Code of Practice for user-to-user services in accordance with section 41 of the Online Safety Act ('the Act').[1]

1.2 Ofcom issues the amendments set out in section 2 of this notification in accordance with section 43(4) of the Act.

1.3 In the course of preparing the draft of amendments of that Code, Ofcom consulted the persons mentioned in section 41(6) and (7) of that Act.

1.4 In accordance with section 43(2) and (3) of the Act, the draft has been laid before Parliament for the 40-day period, during which time neither House of Parliament resolved not to approve the draft.

1.5 The amendments come into force [*at the end of the period of 21 days beginning with the day on which they are issued*] in accordance with section 43(4) of the Act.

1.6 Ofcom will publish the amended codes of practice on its website in accordance with section 46 of the Act.

Signed by

[Name]

[Position]

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

[Date]

[1] Ofcom, Protection of Children Code of Practice for user-to-user services (4 July 2025), as amended by "Amendments to the Protection of Children Code of Practice for user-to-user services" on 12 October 2026 with effect from 2 November 2026 (the "Crisis response amendments"). A consolidated version of the Protection of Children Code of Practice for user-to-user services incorporating amendments is published on Ofcom's website (Online safety regulatory documents and guidance).

2. Amendments

2.1 The Protection of Children Code of Practice for user-to-user services is amended as follows.

Amendments to the introduction

2.2 In Section 1 (Introduction)–

a) in paragraph 1.9, for "Commissioner's Office" substitute "Commission";
b) in paragraph 1.10, for "Commissioner's" substitute "Commission's";
c) after paragraph 1.10, insert–

"External documents

1.11 A hard copy of any external document referred to in the recommended measures can be obtained by writing to Ofcom at Riverside House, 2a Southwark Bridge Road, London, SE1 9HA (tel. 020 7981 3000).".

Amendments to application and scope

2.3 In Section 2 (Application and scope), omit paragraph 2.7.

Amendments to index of recommended measures

Amendments relating to age assurance

2.4 In Section 3 (Index of recommended measures), in the entries after the heading "Age assurance", in the entry for PCU B1–

a) in the second column, for the words "Implementing an age" substitute "Age";
b) in the third column, for the words from "**highly effective age assurance**" to the end, substitute "an **age assurance process** to determine which ***United Kingdom users*** of the service are ***children***.".

Amendments relating to content moderation

2.5 In Section 3 (Index of recommended measures), in the entries after the heading "Content moderation", after the entry for PCU C4, insert the following entry–

PCU C4A	Steps to take on reversal of content decisions	All **services likely to be accessed by children**.	Section 13(8) Section 22(2) and 22(3)

Amendments relating to reporting and complaints

2.6 In Section 3 (Index of recommended measures), in the entries after the heading "Reporting and complaints", after the entry for PCU D10, insert the following entry–

PCU D10A	Appropriate action for content appeals – action following determination (content decision not reversed)	**Services likely to be accessed by children** that are either (or both) a **large service** or **multi-risk (children)**.	Section 21(2)(b)†

Amendments relating to terms of service

2.7 In Section 3 (Index of recommended measures), in the entries after the heading "Terms of service", after the entry for PCU G1, insert the following entry–

PCU G1A	Terms of service: substance (large or multi-risk services)	**Services likely to be accessed by children** that are either (or both) a **large service** or **multi-risk (children)**.	Section 12(9), (11) and (12) Section 21(3)†

New heading and entry relating to user access

2.8 In Section 3 (Index of recommended measures), after the entry for PCU G3, insert the following heading and entry–

User access			
PCU H2[2]	User sanctions	**Services likely to be accessed by children** (a) that are either (or both) a **large service** or **multi-risk (children)** and (b) on which one or more specific kinds of **relevant content that is harmful to children** are **prohibited**.	Section 12(2) and (3)

Amendments to recommended measures

Amendments relating to age assurance

Amendments to PCU B1

2.9 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B1–

a) in the heading of PCU B1, for "Implementing an age" substitute "Age";
b) in PCU B1.1, for the words from "**highly effective age assurance**" to the end, substitute "an **age assurance process** to determine which ***United Kingdom users*** of the service are ***children***.";
c) after the heading "Recommendation" which follows PCU B1.1, insert–

[2] We have not used the numbering H1 in this draft of amendments for consistency with the numbering used in Ofcom's Illegal content Codes of Practice for user-to-user services (24 February 2025).

"PCU B1.1A In order to ensure that its **age assurance process** is highly effective at correctly determining whether or not a ***user*** is a ***child***, the provider should ensure that it meets each of the criteria listed under:

a) PCU B1.1B (technical accuracy),
b) PCU B1.1C (robustness),
c) PCU B1.1D (reliability), and
d) PCU B1.1E (fairness).

PCU B1.1B The technical accuracy criterion is fulfilled if:

a) the provider has ensured that the measures forming part of the **age assurance process** for the service have been evaluated against appropriate metrics to assess the extent to which they can correctly determine the age or age range of a person under test lab conditions and the results indicate that the measures are able to correctly determine whether or not a particular ***user*** is a ***child***;
b) where the **age assurance process** used on the service involves the use of ***age estimation***, the provider uses a **challenge age approach**; and
c) the provider periodically reviews whether the technical accuracy of the **age assurance process** for the service could be improved by making use of new technology and, where appropriate, makes changes to the **age assurance process**.

PCU B1.1C The robustness criterion is fulfilled if:

a) the provider has:
    i) taken steps to identify methods ***children*** use to circumvent the **age assurance process** used on the service to determine that the relevant individual is not a ***child*****;** and
    ii) taken feasible and proportionate steps to prevent ***children*** using those methods;
b) the provider has ensured that the **age assurance** measures forming part of the **age assurance process** for the service have been tested in multiple different environments during the development of the **age assurance process**; and
c) the provider has identified, and taken appropriate steps to mitigate against, methods of circumvention that are easily accessible to **children in the United Kingdom** and where it is reasonable to assume that **children in the United Kingdom** may use them.

PCU B1.1D The reliability criterion is fulfilled if:

a) where **age assurance** measures forming part of the **age assurance process** rely on artificial intelligence or machine learning, the provider has taken steps to ensure that:
    i) the artificial intelligence or machine learning has been suitably tested during the development of the **age assurance process** to ensure it **produces reproducible results**;
    ii) the artificial intelligence or machine learning is regularly tested to ensure it **produces reproducible results**;

iii) the outputs of the artificial intelligence or machine learning used are monitored and assessed against key performance indicators designed to identify whether the artificial intelligence or machine learning **produces reproducible results**; and

iv) in circumstances where the artificial intelligence or machine learning used are observed to be producing unreliable or unexpected results, the root cause of the issue is identified and rectified; and

b) the provider has taken steps to ensure that any evidence relied upon as part of the **age assurance process** comes from a trustworthy source.

PCU B1.1E The fairness criterion is fulfilled if:

a) the provider has ensured that any elements of the **age assurance process** for the **service** which rely on artificial intelligence or machine learning have been tested and trained on data sets which reflect the diversity in the target population; and

b) the provider has ensured that any elements of the **age assurance process** which rely on artificial intelligence or machine learning have been evaluated against either the outcome or the error parity and the results indicate that the **age assurance process** does not produce significant bias or discriminatory outcomes.";

d) in PCU B1.2(d), for "Commissioner's" substitute "Commission's";[3]

e) in PCU B1.3 and PCU B1.4, omit "process" in each place it occurs.

Amendments to PCU B2

2.10 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B2.5(a), omit "implementing an".

Amendments to PCU B3

2.11 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B3.5(a), omit "implementing an".

Amendments to PCU B4

2.12 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B4.4(a), omit "implementing an".

Amendments to PCU B5

2.13 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B5.4(a), omit "implementing an".

Amendments to PCU B6

2.14 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B6.4(a), omit "implementing an".

[3] When publishing the next consolidated version of the Code, Ofcom intends to also update the hyperlink to the Information Commission's Opinion titled "Age Assurance for the Children's code" published on 18 January 2024, in the footnote relating to PCU B1.2(d).

Amendments to PCU B7

2.15 In Section 4 (Recommended measures), in subsection B (Age assurance), in PCU B7.4(a), omit "implementing an".

Amendments relating to content moderation

Amendments to PCU C1

2.16 In Section 4 (Recommended measures), in subsection C (Content moderation), in PCU C1.6–

a) before sub-paragraph (a), insert–

"za) Recommendation PCU C4A;";

b) in sub-paragraph (b), for the words "(whichever is applicable) and PCU D10", substitute "(whichever is applicable), PCU D10, and PCU D10A (where applicable)".

Amendments to PCU C2

2.17 In Section 4 (Recommended measures), in subsection C (Content moderation), in PCU C2.14–

a) before sub-paragraph (a), insert–

"za) Recommendation PCU C4A;";

b) in sub-paragraph (b), for the words "(whichever is applicable) and PCU D10", substitute "(whichever is applicable), PCU D10, and PCU D10A (where applicable)".

Amendments to PCU C3

2.18 In Section 4 (Recommended measures), in subsection C (Content moderation), in PCU C3, at the end, insert–

"Safeguard for freedom of expression and privacy

PCU C3.5 Recommendation PCU C4A is a safeguard to protect ***United Kingdom users'*** right to freedom of expression and the privacy of ***United Kingdom users***.".

Amendments to PCU C4

2.19 In Section 4 (Recommended measures), in subsection C (Content moderation), in PCU C4.5–

a) for "refers to" substitute "refers to:";
b) the words from "the action recommended" to the end become sub-paragraph (a) of PCU C4.5;
c) after the new sub-paragraph (a), insert–

"; or

b) where it is not currently technically feasible for the provider to take the action recommended in PCU C2.3 to PCU C2.11 and one or more specific kinds of **relevant content that is harmful to**

children are **prohibited** on the service, the action recommended in PCU C1.3 to PCU C1.5, so far as it relates to at least those specific kinds of **relevant content that is harmful to children** or **content that is harmful to children proxy** (or both).".

Insertion of a new recommendation (PCU C4A)

2.20 In Section 4 (Recommended measures), in subsection C (Content moderation), after PCU C4, insert–

"PCU C4A Steps to take on reversal of content decisions

Application

PCU C4A.1 This measure applies to a ***provider*** in respect of each **service likely to be accessed by children** it provides.

Recommendation

PCU C4A.2 If a ***provider*** reverses a previous decision that ***content*** is ***content that is harmful to children*** or **content that is harmful to children proxy**, and this reversal is not in relation to a **relevant complaint** that is a **content appeal** (for which, see PCU D10), it should take the steps listed in PCU D10.2(a), (b) and (c).".

Amendments to PCU C11

2.21 In Section 4 (Recommended measures), in subsection C (Content moderation), in PCU C11.8(c), for the words "(whichever is applicable) and PCU D10", substitute "(whichever is applicable), PCU D10, and PCU D10A (where applicable)".

Amendments relating to reporting and complaints

Amendments to PCU D8

2.22 In Section 4 (Recommended measures), in subsection D (Reporting and complaints), in PCU D8–

a) in PCU D8.4–

i) in sub-paragraph (b), after "***content that is harmful to children***", in both places those words occur, insert "or **content that is harmful to children proxy**";

ii) in sub-paragraph (c), after "***content that is harmful to children***", insert "or **content that is harmful to children proxy**";

b) after PCU D8.4, insert–

"PCU D8.5 In determining **relevant complaints** which are **content appeals** relating to the ***United Kingdom user*** being **sanctioned**, the provider should consider whether, in the circumstances of the case, the **sanction** that has been imposed is appropriate, having regard to its policy on **sanctions**.".

Amendments to PCU D10

2.23 In Section 4 (Recommended measures), in subsection D (Reporting and complaints), in PCU in PCU D10.2, in the words before sub-paragraph (a), after "***content that is harmful to children***", insert "or **content that is harmful to children proxy**".

Insertion of a new recommendation (PCU D10A)

2.24 In Section 4 (Recommended measures), in subsection D (Reporting and complaints), after PCU D10, insert–

"PCU D10A Appropriate action for content appeals – action following determination (content decision not reversed)

Application

PCU D10A.1 This measure applies to a ***provider*** in respect of each **service likely to be accessed by children** it provides, which is either (or both) of the following:

a) a **large service**; or

b) a **multi-risk service**.

Recommendation

PCU D10A.2 If the provider upholds, in whole or in part, a **relevant complaint** that is a **content appeal** relating to the ***user*** being **sanctioned** under the provider's policy on **sanctions** (see Recommendation PCU H2), but does not reverse its decision that ***content*** was ***content that is harmful to children*** or **content that is harmful to children proxy**, the provider should:

a) reverse the action taken against the ***user***, and

b) apply the appropriate **sanction** having regard to its policy on **sanctions** (see Recommendation PCU H2).".

Amendments relating to recommender systems

Amendments to PCU E1

2.25 In Section 4 (Recommended measures), in subsection E (Recommender systems), in PCU E1.7, for sub-paragraph (b) substitute–

"(b) Recommendations PCU C1, PCU C2 and PCU C4A, and where they are applicable, Recommendations PCU C3, PCU C4, PCU C5, PCU C6, PCU C7 and PCU C8;".

Amendments to PCU E2

2.26 In Section 4 (Recommended measures), in subsection E (Recommender systems), in PCU E2.9, for sub-paragraph (b) substitute–

"(b) Recommendations PCU C1, PCU C2 and PCU C4A, and where they are applicable, Recommendations PCU C3, PCU C4, PCU C5, PCU C6, PCU C7 and PCU C8;".

Amendments to PCU E3

2.27 In Section 4 (Recommended measures), in subsection E (Recommender systems), in PCU E3.8–

a) at the beginning, insert–

"The following measures are safeguards to protect ***United Kingdom users'*** right to freedom of expression and the privacy of ***United Kingdom users***:

a) Recommendation PCU C4A;";

b) the words from "Recommendations ICU D1 and ICU D2" to "user-to-user services" become sub-paragraph (b) of PCU E3.8;

c) omit "are safeguards to protect ***United Kingdom users'*** right to freedom of expression and the privacy of ***United Kingdom users***".

Amendments relating to terms of service

Insertion of a new recommendation (PCU G1A)

2.28 In Section 4 (Recommended measures), after PCU G1, insert–

"PCU G1A Terms of service: substance (large or multi-risk services)

Application

PCU G1A.1 This measure applies to a ***provider*** in respect of each **service likely to be accessed by children** it provides that is either (or both) of the following:

a) a **large service**;

b) **multi-risk (children)**.

Recommendation

PCU G1A.2 The provider should include in the ***terms of service*** provisions giving information about its policy on **sanctions**, addressing, at least, the **sanctions** which the provider may impose on ***users*** who generate, upload or share ***content*** that it determines to be **relevant content that is harmful to children** or **content that is harmful to children proxy** (see Recommendation PCU H2).".

Insertion of new measures relating to user access

2.29 In Section 4 (Recommended measures), after subsection G (Terms of service), insert the following subsection as subsection H–

"H. User Access

PCU H2 User sanctions

Application

PCU H2.1 This measure applies to a ***provider*** in respect of each **service likely to be accessed by children** it provides:

a) that is **a large service** or **multi-risk (children)** (or both); and
b) on which one or more specific kinds of **relevant content that is harmful to children** are **prohibited**.

Recommendation

PCU H2.2 The provider should prepare and apply a policy in respect of the **sanctions** to be imposed on ***United Kingdom users*** who generate, upload or share:

a) the specific kinds of **relevant content that is harmful to children** that are **prohibited** on the service, or
b) **content that is harmful to children proxy**,

with the objective of preventing the future dissemination of **relevant content that is harmful to children**.

PCU H2.3 The policy should set out the **sanctions** that the provider may impose on a ***United Kingdom user*** who generates, uploads or shares ***content*** that the provider determines to be **relevant content that is harmful to children** or **content that is harmful to children proxy** (see PCU C1 and C2 with regard to determining **relevant content that is harmful to children** and **content that is harmful to children proxy**).

PCU H2.4 In setting its policy on the circumstances in which it will impose a **sanction** on such a ***user***, and the seriousness of the appropriate **sanction** in those circumstances, the provider should have regard to at least the following factors:

a) the severity of potential harm to **child users** if they encounter the **relevant content that is harmful to children** or **content that is harmful to children proxy** on the service;

b) whether the ***user*** has previously generated, uploaded or shared **relevant content that is harmful to children** or **content that is harmful to children proxy**, including whether the ***user*** was **sanctioned** for doing so; and

c) the potential impact of the type and duration of the **sanction** on the ***user*** being **sanctioned**.

PCU H2.5 The provider should regularly review and update the policy on **sanctions** to ensure it remains fit for purpose, taking into account at least:

a) the service's **children's risk assessment**; and

b) any matters arising from **relevant complaints**, which have been determined since the policy was last reviewed, which were **content appeals** relating to ***users*** who had been **sanctioned** under the provider's policy on **sanctions**.

Safeguards for freedom of expression and privacy

PCU H2.6 The following measures are safeguards to protect ***United Kingdom users'*** right to freedom of expression and the privacy of ***United Kingdom users***:

a) Recommendation PCU C4A;
b) Recommendations PCU D1 and PCU D2, so far as they relate to **content appeals**, PCU D8, PCU D10.2(a), PCU D10A, and PCU H2.4;
c) Recommendations ICU D1 and ICU D2, so far as they relate to complaints by ***United Kingdom users*** and ***affected persons*** if they consider that the provider is not complying with its duties in relation to freedom of expression or privacy, and ICU D12, in the Illegal Content Codes of Practice for user-to-user services.".

Amendments to definitions and interpretation

Amendments to definitions in Table A

2.30 In Section 5 (Definitions and interpretation), in Table A–

a) in the entry for "**Content appeal**", in the words before paragraph (a), after "***content that is harmful to children***", insert "or **content that is harmful to children proxy**";
b) in the entry for "**Highly effective age assurance**", for the words "See paragraphs 5.10 to 5.15" substitute–

"An **age assurance process** that meets each of the criteria listed under:

a) PCU B1.1B (technical accuracy),
b) PCU B1.1C (robustness),
c) PCU B1.1D (reliability), and
d) PCU B1.1E (fairness).";

c) in the entry for "**Relevant complaint**", in paragraphs (c) and (d), after "***content that is harmful to children***", insert "or **content that is harmful to children proxy**";
d) after the entry for "**Safety duties protecting children**", insert the following entry–

Sanction	An action taken against a ***user*.** This includes: a) giving a warning to the ***user***, b) suspending or banning the ***user*** from using the **service**, or c) in any other way restricting the ***user's*** ability to use the **service**. The term "sanctioned" is to be read accordingly.

2.31 In Section 5 (Definitions and interpretation)–

a) after paragraph 5.9, omit the heading "Highly effective age assurance";
b) omit paragraphs 5.10 to 5.15.

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