



Pinterest Response to Consultation:
Deceased Child User Duties

Consultation title	Consultation: Deceased Child User Duties
Full name	
Contact phone number	N/A
Representing	Organisation
Organisation Name (if applicable)	Pinterest
Email Address	

Your Response

I. Introduction

The following is Pinterest's response to Ofcom's consultation published on 15 December 2025 (the "**Consultation**") on its draft guidance on deceased child user duties (the "**Draft Guidance**").

Pinterest is a visual search and discovery engine where people around the world go to get the inspiration to create a life they love. Pinterest shows users visual recommendations called Pins. Pins are created by both individuals and businesses by uploading photos or videos or bookmarking content from the web, with the option to provide a text caption. Users can save and organise these recommendations into collections called boards. Some of our most common use cases include fashion, food, beauty, home decor, and travel.

Pinterest welcomes Ofcom's Draft Guidance as a valuable support for relevant service providers in interpreting, understanding and complying with the deceased child user duties as set out in section 75 of the UK Online Safety Act 2023 (the "**Act**"). We agree with the proposed objectives of the Draft Guidance and many of the proposals and best practices are already well-aligned with our standard operating procedures. In our following Consultation response, we have focused our comments on addressing the points in the Draft Guidance and questions in the Consultation that are most relevant to our service and where we feel our input can meaningfully inform Ofcom's Consultation of the Draft Guidance.

II. Terms of Service

Ofcom proposes that services set out various pieces of information *within* the terms of service in a clear and accessible way, including: (i) the provider's policy for dealing with requests from



bereaved parents for information about their child's use of the service; (ii) the provider's procedure for bereaved parents to request information; (iii) evidence that is required by the provider; and (iv) sufficient detail about the disclosure of information.

Pinterest agrees that transparency is critical in this area. In light of this, we consider it most clear, accessible and user-friendly to host this level of granular information in a dedicated Help Centre article, where it can be easily located via search engines for users and non-users and presented clearly in a simple and digestible format rather than through contractual clauses and sub-sections in the terms of service. This will allow bereaved parents of deceased users (who may themselves be non-users) to easily find the relevant information, without having to navigate through the entirety of the terms of service. In addition, there is a continuously growing number of terms of service requirements globally and providers face a difficult challenge of incorporating multiple country-specific obligations in a single set of terms of service whilst ensuring it is still as short and clear as possible to ensure transparency and accessibility for users. Therefore, we strongly recommend Ofcom revisit this aspect of the draft Guidance and clarify that the more user-friendly, accessible, proportionate and practicable approach of including this granular information in a comprehensive stand-alone Help Centre page, linked out from the terms of service as needed, is an acceptable method for providers to meet its transparency obligations in under section 75 of the Act. Allowing providers to determine how best to present this information, so long as the underlying transparency objectives are met, is particularly important for global providers managing multiple overlapping regulatory regimes.

III. Responding to Bereaved Parents in a Timely Manner

Pinterest is aligned with Ofcom's approach on determining what constitutes a "timely manner" and agrees that the nature and extent of the request will naturally have an impact on timescales. In practice, we always respond promptly and engage respectfully and our approach is largely aligned with many of the good practice recommendations suggested by Ofcom. In relation to performance targets, whilst we do not object overall to the setting of performance targets, in our experience, performance targets based solely on making decisions quickly can risk deprioritising accuracy and decision quality. In addition, a small number of edge cases can skew average turnaround times because of the additional analysis required to make an accurate decision. Strictly measuring platforms against time-based performance targets may be inappropriate in such sensitive circumstances and may create perverse incentives to act

"quickly" or reject valid requests, instead of engaging in careful review of the request. We support non-prescriptive performance targets with a proportionate, outcomes-focused approach and in practice, we set and monitor quality-oriented metrics to track and understand performance. We strongly recommend Ofcom allow companies to set performance targets that work in the context of each company's own services and processes and measure the targets with an eye towards overall success and requesters' satisfaction of the process, rather than a reductive consideration of whether time-based targets were met.



IV. Support Function

Ofcom sets out its expectations in the Draft Guidelines on how providers must comply with the requirement under the Act to maintain a dedicated helpline, section of the service, or similar means by which parents can easily find out what they need to do to obtain information and updates on their request.

Pinterest agrees with the importance of providing a clear and effective support function in this context and welcomes Ofcom's flexibility in allowing providers to decide the type of support function most appropriate for the platform. Pinterest is likely to establish a dedicated Help Centre article, or add the necessary information to Pinterest's existing dedicated Help Centre article for the Act¹. Help Centre articles are easily searchable and accessible, regardless of whether parents are registered as users.

As Ofcom acknowledges in paragraph 3.39 of the Draft Guidance, much of the information required to be provided via the support function duplicates the information that providers are required to include within their terms of service. Furthermore, the information suggested as *good practice* to include in the support function is also largely duplicative of the information that is either (a) *required* to be included in the terms of service under the Act (e.g. detail about the kinds of information that would be disclosed and how it would be disclosed); or (b) *recommended* to be included in the terms of service as good practice under paragraph 3.26 of the Draft Guidance (e.g. timescale for providing a response and factors that may affect this). To avoid unnecessary duplication, we strongly recommend Ofcom make clear in its final guidance that a comprehensive, stand-alone Help Centre article, containing all information required to be disclosed under section 75 of the Act, and clearly linked from the terms of service and any other appropriate user-facing surfaces as needed, is sufficient to meet the expectations around transparency and accessibility in this area. Please also refer to our feedback relating to the terms of service above under [Section II \(Terms of Service\)](#) which aligns with this point.

V. Complaints Function

In the Draft Guidance, Ofcom sets out the practical steps that providers must take to be considered compliant with the duty under the Act to operate a complaints procedure which allows for relevant complaints to be made by bereaved parents.

Pinterest welcomes Ofcom's proposal to align these practical steps on operating a complaints function with the approach taken in the Illegal Content and Protection of Children Codes. In particular, we agree with the proposal not to require providers to create and maintain a separate complaints function. We currently maintain a dedicated email address which operates as a single point of intake for all complaints in relation to the Act for users and non-users. This email address

¹ <https://help.pinterest.com/en-gb/article/uk-online-safety-act>



is easy to find and is listed within our Help Centre article for the Act², where we explain the process and possible courses of action. Pinterest agrees with Ofcom's view that it would be disproportionate to require providers to operate a separate complaints function and more importantly, we believe that a single complaints function makes it easier for potential complainants to access and use, in accordance with section 75(5)(c) of the Act.

Pinterest takes appropriate actions following a receipt of a complaint, already largely aligned with Ofcom's expectations listed in the Draft Guidance. A nominated team handles each complaint and the response always sets out the outcome and reasoning for the decision. Pinterest strongly agrees with Ofcom's acknowledgement that the nature of appropriate action will depend on the complaint; this proportionate and flexible approach allows providers to respond effectively in light of the type and complexity of the complaint and respects the unique circumstances of each provider. For instance, due to our relatively low number of complaints at present, we typically triage complaints within a few hours and respond to complaints promptly thereafter, so a formal acknowledgement of receipt and detailed indicative timelines are unlikely to be meaningful or necessary to a complainant. Similarly, details around possible outcomes and the process for handling complaints will already be required and presented elsewhere and duplication of text in an acknowledgement of receipt is unlikely to be useful and may cause information fatigue; a direct link to a Help Centre article setting out all of the required information would be equally transparent and accessible to the complainant.

In relation to the requirement to include easily accessible provisions specifying the policies and processes that govern the handling and resolution of complaints in the terms of service, our feedback is as set out in [Section II \(Terms of Service\)](#). We encourage Ofcom to confirm in its final guidance that a comprehensive, stand-alone Help Centre article, clearly linked as needed on other surfaces and correspondence, is an acceptable way to meet expectations around transparency and accessibility.

VI. Good Practice

Pinterest is committed to implementing measures that are appropriate, proportionate and effective for our platform and recognises the importance of having clear, transparent and accessible systems to support bereaved parents with dignity and respect. We support Ofcom's approach of allowing providers to determine their own policies and procedures on disclosure of information and evidence required so that providers can adapt processes to their service design, user base and request volumes. In addition, Pinterest appreciates Ofcom's indications of good practice throughout the Draft Guidelines and as mentioned above, our procedures largely align with the recommendations and we will continue to evaluate the final guidelines and suggested good practice steps to consider how we can further improve our processes in this area. We would

² <https://help.pinterest.com/en-gb/article/uk-online-safety-act>



strongly caution against codifying any of the good practice steps without robust evidence as to their effectiveness, feasibility and proportionality and appropriate consultations as needed.

VII. Conclusion

Pinterest is grateful for the opportunity to contribute to the important work being done by Ofcom in developing the Draft Guidelines. We would welcome further engagement as part of this process, and if it would be of assistance, we would be happy to elaborate on or discuss any of the points raised in this response or any other matters of interest to Ofcom. In particular, we would welcome the opportunity to work with Ofcom on recognising the role that a comprehensive, well sign-posted Help Centre article can play in delivering the requisite transparency and accessibility outcomes envisaged by section 75 of the Act.