Annex 1

Additional consultation feedback

Introduction

A1.1 In addition to commenting on our proposals, respondents made a number of suggestions about wider steps that providers could take when dealing with requests from bereaved parents. These included suggestions about the handling and prioritisation of individual requests, the information providers might disclose or publish, additional forms of support for bereaved parents, and wider transparency and complaints arrangements. This Annex summarises the principal additional feedback we received.

A1.2 We have considered this feedback in finalising the Guidance. As explained in Section 3, we have made a limited number of changes to our good practice recommendations in response to consultation feedback. We have not otherwise made recommendations on the wider operational matters summarised in this annex because they deal with matters that go beyond the areas the duties cover.

What respondents said

A1.3 Respondents made a number of suggestions about the information providers might disclose and how the information could be prepared or provided to bereaved parents. Dr Harbinja suggested that providers could offer a "curated archive" or redacted summary, manually screen and redact information to protect third-party privacy, and use secure methods to provide information that is disclosed. She also suggested that providers could provide simpler information earlier while a wider request remained under consideration.[1] Other respondents suggested providing information in accessible or commonly used formats and offering assistance where information is complex or difficult to interpret.[2]

A1.4 Dr Harbinja suggested that providers should suspend automatic deletion or memorialisation processes while a request concerning a deceased child's use of a service is being considered. She also suggested that services could allow users during their lifetime to nominate a person to receive information in specified circumstances following their death.[3]

A1.5 Dr Harbinja suggested that providers use a priority-flagging system where a request relates to an active police or coronial investigation. She also made suggestions about staged handling of requests and coordination of relevant work.[4]

A1.6 Dr Harbinja suggested that providers should proactively refer bereaved parents to bereavement support organisations and provide technical assistance to help parents understand information that is disclosed.[5]

A1.7 Respondents suggested additional arrangements for escalating or reviewing requests and complaints. These included specialised or prioritised escalation, second-tier or independent

[1] Dr Edina Harbinja's response to December 2025 Consultation p. 4.
[2] 5Rights, p.3., Dr Edina Harbinja's response to December 2025 Consultation p.9.
[3] Dr Edina Harbinja's response to December 2025 Consultation p. 7.
[4] Dr Edina Harbinja's response to December 2025 Consultation p. 7.
[5] Dr Harbinja's response to December 2025 Consultation p. 19.

review mechanisms, the involvement of an ombudsman or Ofcom where a bereaved parent remained dissatisfied, and the use of clarification calls and written summaries in connection with complaints.[6]

A1.8 Respondents also suggested measures intended to increase wider transparency about the operation of the deceased child user arrangements. These included publishing average response times for requests, statistics about deceased child user complaints and their outcomes, and information about providers' policies. 5Rights also suggested that Ofcom maintain a public record of providers' policies.[7]

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[6] Dr Harbinja's response to December 2025 Consultation p. 21.

[7] 5Rights, p. 4., Dr Harbinja's response to December 2025 consultation, p. 8.