Intimate image abuse takedown

New illegal content duties

Consultation

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A Welsh version of the Overview is available

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1. Overview

1.1 Ofcom is the United Kingdom's communications regulator, overseeing sectors including telecommunications, post, broadcast TV and radio. Under the Online Safety Act 2023 (the Act) Ofcom is also the UK regulator for online safety.

1.2 Women and girls' online safety is a strategic priority for Ofcom, and we are acting on the urgent need to tackle the harm and abuse they face online. Intimate image abuse is a widespread harm that disproportionately affects women and is a priority offence under the Act. Intimate image abuse has a profound negative impact on survivors and victims, including a constant fear that their images will not be removed or may resurface.

1.3 The Crime and Policing Act 2026 introduced new duties on service providers to take down reported intimate image content as soon as reasonably practicable, and no later than 48 hours, after receiving a report. Service providers must also enable these reports to be made easily and operate an expedited complaints procedure in relation to these reports.

1.4 These new duties will help improve the experiences of survivors and victims of intimate image abuse in making reports and getting illegal content taken down quickly.

1.5 We recognise that significant harm can be caused to survivors and victims as soon as intimate images are shared without consent. In many cases, we consider it will be feasible for service providers to take down content sooner than 48 hours after receiving a report.

1.6 We are inviting responses to our consultation by **20 January 2027**. We will take all feedback into account and expect to publish our final statement and documents by **mid-2027**.

What we are proposing – in brief

This consultation sets out our proposals to amend existing measures and include new measures in the Illegal Content Codes of Practice, to reflect the new duties relating to intimate image abuse. These provide that:

- User-to-user and search service providers offer easy to find, easy to access and easy to use routes for users and affected persons to make intimate image content reports. User-to-user and search service providers should enable users and affected persons to easily access information on certain matters before submitting a report.
- User-to-user service providers have a content moderation function that ensures reported intimate image content is taken down as soon as reasonably practicable, and no later than 48 hours, after receipt of a report.
- Search service providers have a search moderation function that ensures users are no longer able to encounter reported intimate image content as soon as reasonably practicable, and no later than 48 hours, after receipt of a report.
- User-to-user and search service providers operate an expedited, transparent complaints process for complaints relating to intimate image content reports.

We also set out minor proposed changes to the Illegal Content Judgements Guidance.

The overview section in this document is a simplified high-level summary only. The proposals we are consulting on, and our reasoning, are set out in full in this document.

2. Introduction

Intimate image abuse

2.1 For the purpose of the new legal duties in the Online Safety Act (the Act) and our consultation, intimate image abuse refers to the sharing of intimate images without the consent of the person depicted in the image.[1] Intimate image abuse is a priority offence[2] under the Act.

2.2 Intimate images can be in the form of a photograph or video and include manipulated images and videos such as AI-generated images or "deepfakes". Our Illegal Content Judgements Guidance provides more information on how service providers can determine whether content amounts to intimate image abuse.

2.3 Evidence demonstrates that intimate image abuse is a widespread and prevalent harm. A study by 'My Image My Choice' shows AI-generated intimate image abuse has been growing exponentially[3] and in 2025 the Revenge Porn Helpline reported over 20,000 images for removal, an increase of 34% since 2024.[4]

2.4 Intimate image abuse has a profound negative impact on survivors and victims, including psychological, emotional, professional, and relational harm.[5] Survivors and victims face ongoing challenges in reporting this content online and getting it removed,[6] and experience a constant fear that their images will not be removed or might resurface online.[7]

2.5 Women and girls' online safety is a strategic priority for Ofcom. We know intimate image abuse disproportionately affects women,[8] and we are acting on the urgent need for better online protections. In May 2026, we introduced new measures to be included in the Illegal Content Codes of Practice recommending that certain service providers use 'hash-matching' technology to detect intimate image abuse and reduce its spread online.[9]

2.6 To support the implementation of these new measures, in September 2026 we launched an enforcement programme into how relevant service providers are preventing users from

[1] Section 66B(1),(2) and (3) of the Sexual Offences Act 2003.
[2] The most serious and prevalent illegal content and activity covered by the Act.
[3] My Image My Choice, 2024. Deepfake Abuse: Landscape Analysis 2023-24. [accessed 15 October 2026].
[4] Revenge Porn Helpline (Mortimer, S.), 2026. Revenge Porn Helpline Annual Report 2025. [accessed 30 September 2026].
[5] Flynn, A., Powell, A., Scott, A. and Cama, E., 2022. Deepfakes and Digitally Altered Imagery Abuse: A CrossCountry Exploration of an Emerging form of Image-Based Sexual Abuse, *The British Journal of Criminology,* 62 (6). [accessed 15 October 2026].
[6] Department for Science, Innovation & Technology and PUBLIC, 2025. Platform Design and the Risk of Online Violence Against Women and Girls. [accessed 15 October 2026]; Refuge, 2021. Unsocial Spaces. [accessed 15 October 2026]; The Open University (Jurasz, O.), 2024. 'Online Violence Against Women: A Four Nations Study'. [accessed 15 October 2026].
[7] McGlynn, C., Johnson, K., Rackley, E., Henry, N., Gavey, N., Flynn, A. and Powell, A., 2021. 'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse, Social & Legal Studies, 30 (4). [accessed 15 October 2026].
[8] Revenge Porn Helpline (Mortimer, S.), 2026. Revenge Porn Helpline Annual Report 2025. [accessed 30 September 2026].
[9] Hash matching is a process for detecting content that has previously been identified as being illegal, or otherwise violative, to prevent the upload and sharing of the content. See Statement: Detecting intimate image abuse.

encountering intimate image abuse on their services. We have already opened investigations into the providers of two adult services.[10]

2.7 The proposals set out in this consultation build on and complement our existing work to tackle the spread of intimate image abuse online and reduce the burden on survivors and victims of intimate image abuse to find and report this content. The proposed measures set out in this consultation implement new legal duties and ensure all service providers have clear reporting channels for intimate image abuse in place and take down this content quickly once it is reported.

2.8 Earlier this year our intimate image abuse hash matching measures came into force. The measures provide for certain service providers who are higher risk for intimate image abuse to deploy hash-matching technology to ensure intimate image abuse is better detected to prevent the sharing, and re-sharing, of this content. We set out in our hash matching measures our expectation that when service providers identify new intimate image abuse content, they should, where possible, add hashes of that content to any internal or third-party hash databases they use. This would cover new intimate image abuse identified through intimate image content reports.

New duties relating to intimate image abuse

2.9 The Crime and Policing Act 2026 amended the Act to introduce new duties on user-to-user and search service providers, to allow users and affected persons,[11] including people who are depicted in the content but not necessarily users of a service, to easily report intimate image abuse content through dedicated intimate image content reports.[12] This is a type of illegal content report defined in the Act, under which the reporter declares that content present on the service is intimate image abuse and provides sufficient information about the content for the service provider to identify it.[13]

2.10 Service providers must take down reported intimate image content, and any other content that is the same or substantially the same as that content, as soon as reasonably practicable and no later than 48 hours, after receiving the report.[14] The duties are clear that 48 hours is not a performance target for service providers to remove this content, but rather is an absolute maximum. Significant harm can be caused to survivors and victims of intimate image abuse as soon as images depicting them are shared without their consent. Given this, we expect in many cases it will be feasible for service providers to take down content much sooner than 48 hours after receiving an intimate image content report.

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[10] See Enforcement programme into measures being taken by services to prevent users from encountering or sharing non-consensual intimate imagery (NCII).

[11] An 'affected person' includes a person, other than a user of the service, who is in the United Kingdom and who is either the subject of the content, or an adult providing assistance in using the service to another adult who requires assistance (where that other adult is a user of the service or is the subject of the content). See Section 20(5) and section 31(5) of the Act.

[12] Section 20A and Section 31A of the Act.

[13] The report must also be made by the subject of the content (or a person acting on their behalf), declare that the report is made in good faith and is true (to the best of the knowledge and belief of the person making the report), and provide contact details for the person making the report.

[14] Section 10(3A). Section 27(3A) of the Act requires providers of search services to ensure individuals are no longer able to encounter this content as soon as reasonably practicable and no later than 48 hours after the service provider receives the report.

2.11 Service providers also need to operate an expedited complaints procedure in relation to complaints that are made by users or affected persons who have made an intimate image content report and are about the content to which the report relates.[15]

2.12 In this consultation we set out the changes we are proposing to make to the Illegal Content Codes of Practice and Illegal Contents Judgement Guidance to reflect these new duties. We are not at this stage consulting on any other proposed changes in response to the Crime and Policing Act 2026.

Overview of Online Safety Act, Codes of Practice and Illegal Content Judgement Guidance (ICJG)

2.13 The Act gives user-to-user and search service providers a range of duties in relation to illegal content. These include duties on service providers to assess, mitigate, and manage the risk of harm from illegal content and activity, including intimate image abuse.

2.14 Under the Act, Ofcom is required to produce regulatory documents and guidance to assist service providers in complying with their duties. This includes requirements to prepare and issue Illegal Content Codes of Practice which set out the measures we recommend service providers adopt to comply with their illegal content safety duties and their reporting and complaints duties under the Act. The Codes of Practice work like a 'safe harbour', meaning that service providers who choose to implement all applicable measures will be treated as complying with their relevant duties under the Act. Service providers do not need to follow the Codes and may seek to comply with their safety duties by taking what the Act calls 'alternative measures'. Where service providers take alternative measures, they must keep a record of what they have done and explain how the relevant safety duties have been met.[16] Schedule 4 of the Act also sets out a number of considerations and principles Ofcom must have regard to when preparing a Code of Practice, including that measures must be sufficiently clear, proportionate, and technically feasible.

2.15 Ofcom must also produce the Illegal Contents Judgement Guidance (ICJG) which supports service providers in making judgements about whether content is illegal for the purpose of carrying out their risk assessment and complying with their safety duties. The ICJG gives an overview of each offence, including intimate image abuse, and guidance about how to make illegal content judgements in relation to them.

2.16 Ofcom is required by section 6 of the Human Rights Act 1998 to act in a way which is compatible with the European Convention on Human Rights (ECHR). Of particular relevance to Ofcom's functions under the Act are the right to freedom of expression (Article 10 of the ECHR) and the right to privacy (Article 8 of the ECHR). These are qualified rights, and any interference must be prescribed by law, pursue a legitimate aim, and be necessary in a democratic society (i.e. proportionate to the legitimate aim pursued and correspond to a pressing social need). Our starting point is to recognise that the UK Parliament has determined service providers must take certain actions regarding intimate image content. The proposals in this document are designed to achieve the outcomes set out in the relevant duties. The Act, our proposed Code measures and draft updated ICJG are published. Therefore, to the extent that our proposals involve an interference with ECHR rights this is prescribed by law. The relevant legitimate aims that Ofcom is acting in pursuit

[15] Section 21(2A) and Section 32(2A) of the Act.
[16] See Record-Keeping and Review Guidance, pp. 13-14.

of include the prevention of crime and the protection of the rights, freedoms and reputation of others. We have further assessed the impact of our proposals in Sections 3-5 to ensure that where we have identified the potential for interference with ECHR rights, this is proportionate. Our approach to assessing the impact of our proposed measures and guidance on human rights is the same as our approach set out in our December 2024 Statement on Protecting People from Illegal Harms Online.[17]

2.17 Ofcom must have regard to various principles and considerations when carrying out our online safety functions. These include the government's strategic priorities for online safety[18] and the desirability of promoting economic growth, including by ensuring that the regulatory action we take is necessary and proportionate (the 'growth duty').[19]

2.18 We provide more detail on the relevant legal and regulatory framework for this consultation, in Annex 2, 'Legal framework'.

Structure of this document

2.19 This consultation includes the following sections that set out the changes we propose to make to the Illegal Content Codes of Practice and ICJG. We have ordered the sections on our proposed changes to the Illegal Content Codes of Practice to follow the lifecycle of an intimate image content report:

- Section 1, 'Overview' introduces the purpose of this consultation and summarises our proposals.
- Section 2, 'Introduction' sets out the context for our proposals and the structure of this consultation and the corresponding documents.
- Section 3, 'Reporting' sets out our proposed new and amended reporting measures and our reasoning.
- Section 4, 'Content and search moderation' sets out our proposed new content and search moderation measures and our reasoning.
- Section 5, 'Complaints' sets out our proposed new complaints measures and our reasoning.
- Section 6, 'Illegal Content Judgements Guidance' sets out our proposed changes to the ICJG and our reasoning.

2.20 This consultation also has five annexes:

- Annex 1, 'Statutory tests and impact assessments'
- Annex 2, 'Legal framework'
- Annex 3, 'Responding to this consultation'
- Annex 4, 'Ofcom's consultation principles'
- Annex 5, 'Consultation questions'

[17] See Statement: Protecting people from illegal harms online.
[18] Department for Science, Innovation and Technology, 2025. Statement of Strategic Priorities for Online Safety. [accessed 15 October 2026].
[19] Section 108 of the Deregulation Act 2015.

2.21 Alongside this consultation, we have published draft updated versions of the following illegal harms regulatory documents and guidance:

- Illegal Content Codes of Practice for user-to-user services
- Illegal Content Codes of Practice for search services
- Illegal Content Judgements Guidance (relevant extracts)

2.22 We have indicated our proposed changes to the regulatory documents and guidance in red text for visibility. The table below also contains an overview of our proposed changes to the Illegal Content Codes of Practice for user-to-user and search services:

Illegal Content Codes of Practice for user-to-user services	
Content moderation	
ICU C2A	**New measure**
Reporting and complaints	
ICU D1	**Some changes**
ICU D2	**Some changes**
ICU D3A	**New measure**
ICU D12A	**New measure**
Illegal Content Codes of Practice for search services	
Search moderation	
ICS C1A	**New measure**
Reporting and complaints	
ICS D1	**Some changes**
ICS D2	**Some changes**
ICS D3A	**New measure**
ICS D11A	**New measure**

3. Reporting

Introduction

3.1 In this chapter, we set out our proposals to amend existing reporting and complaints measures ICU D1 and ICU D2 and insert a new reporting measure, ICU D3A, into our Illegal Content Codes of Practice for user-to-user services. We also set out our proposals to amend existing reporting and complaints measures ICS D1 and ICS D2 and insert a new measure, ICS D3A, into our Illegal Content Codes of Practice for search services.

3.2 An intimate image content report is a specific type of complaint users or affected persons can make to notify a service provider about intimate image content present on the service. Receipt of an intimate image content report will activate the duty on service providers to take down this content (or ensure individuals can no longer encounter it in the case of search services) as soon as reasonably practicable and no later than 48 hours. The proposed measures in Section 4 (content and search moderation) specifically implement this duty.

3.3 The proposed amendments to the reporting measures recommend service providers offer easy to find, easy to access and easy to use routes for making intimate image content reports and take appropriate action in relation to these reports.

3.4 The proposed new reporting measures recommend that service providers ensure users and affected persons can easily access information on what must be included in an intimate image content report, and that this is the channel for reporting intimate image content for specific moderation action by the service provider as soon as reasonably practicable and no later than 48 hours after receiving the report.

3.5 These proposed amended and new measures would be in addition to the existing measures relating to reporting functions or tools in our Illegal Content Codes.

3.6 We assess the effectiveness of these proposed measures, their costs and impacts, including their impact on human rights. We also explain why we consider these measures to be proportionate.

Explanation of the measures

3.7 The Act requires service providers to operate a service using systems and processes that allow users and affected persons to easily make an intimate image abuse content report to the provider. [20]

3.8 An intimate image content report is a report which:

(a) declares that content present on the service is intimate image content,
(b) declares that the report is made by—
  (i) the subject of the content, or
  (ii) a person acting on that person's behalf,
(c) declares that the report—
  (i) is made in good faith, and
  (ii) to the best of the knowledge and belief of the person making the report, is true,

[20] Section 20A and section 31A of the Act.

(d) provides sufficient information about the content for the service provider to identify it,
(e) provides contact details for the person making the report and complies with any other requirements specified in regulations made by the Secretary of State.[21]

3.9 To implement these new duties, we are proposing to amend our measures about enabling complaints (ICU D1, ICS D1) and having easy to find, easy to access and easy to use complaints systems and processes (ICU D2, ICS D2) in the Illegal Content Codes of Practice for user-to-user and search services. These amendments recommend service providers design and operate systems and processes which:

a) enable users and affected persons (including those without an account on the service) to make intimate image content reports;
b) secure that the provider will take appropriate action in relation to them (appropriate action being taking action in accordance with ICU C2A or ICS C1A (as applicable));
c) consider the accessibility needs of the service provider's United Kingdom user base having regard to certain information, including industry standards and good practice to ensure the reporting process is accessible to disabled people;
d) ensure usability for those dependent on assistive technologies, including keyboard navigation and screen reading technology;
e) clearly signpost the appropriate channel for making an intimate image content report;
f) are clearly accessible;
g) only include reasonably necessary steps; and
h) allow users or affected persons making a report to give the service provider all information necessary for the report to be considered an intimate image content report and any other supporting information.

3.10 An intimate image content report can be made by the subject of the content, whether they are a user of the relevant service or an affected person. 'Affected person' in this context is a person who is not a user of the service but is the subject of the content. Service providers should not therefore require an individual to hold an account, or otherwise be a user of the service, in order to submit an intimate image content report. Intimate image content reports can also be made by a person acting on behalf of the subject of the content (also an 'affected person').[22] Such a person could include a friend, a legal representative or a person working for a specialist support service.

3.11 The information given by users or affected persons to the service provider under f) would include sufficient information for the service provider to identify and locate the content. Service providers should assess reports as intimate image content reports even where the individual making the report is unable to provide a specific URL for the content, provided that sufficient information to identify the content is included. This would help survivors and victims overcome the challenges associated with reporting content that is behind an account or payment wall, where it may not be possible for them to provide a specific URL. Sufficient information individuals may be able to provide could include the name of the account that has shared the content or the identity of the account holder, along with a description of content.

[21] Section 20A(2) and section 31A(2) of the Act. The Secretary of State has made no such regulations to date.
[22] Sections 20A(2)(b), 20(5) and 31(5) of the Act make clear that an 'affected person' in this context is a person, other than a user of the service in question, who is in the United Kingdom and is either the subject of the content, or an adult providing assistance in using the service to another adult who requires such assistance, where that other adult is a user of the service or is the subject of the content.

3.12 We are also proposing new reporting measures, one for user-to-user service providers (ICU D3A) and one for search service providers (ICS D3A). Under these proposed measures service providers should ensure their systems and processes for reporting intimate image content enable users and affected persons to easily access the following information prior to the submission of an intimate image content report:

a) what information must be included for a report to be considered an intimate image content report, in particular:

i) a declaration that the content is intimate image content;
ii) a declaration that the report is made by the subject of the content or a person acting on that person's behalf;
iii) a declaration that the report is made in good faith and is, to the best of the knowledge and belief of the person making the report, true;
iv) sufficient information about the content for the provider to identify it; and
v) contact details for the user or affected person making the report; and

b) that this is the channel for reporting intimate image content for specific moderation action by the provider as soon as reasonably practicable, and no later than 48 hours, in accordance with ICU C2A or ICS C1A (as applicable).

3.13 These proposed measures are designed to help users and affected persons easily make an intimate image content report by ensuring they understand what information is required for it to qualify as an intimate image content report under the Act.

3.14 Neither the proposed amended measures or the proposed new measures would prescribe how service providers should design their reporting systems and processes. Service providers would retain flexibility to determine how best to implement the proposed recommendations. They could integrate intimate image content reports into existing reporting systems, provided users and affected persons are clearly directed to the appropriate reporting route and are able to submit the information required for an intimate image content report.

3.15 The intimate image content reporting channels complement, but do not replace, existing illegal content reporting channels for intimate image abuse. Service providers should continue to enable the reporting of intimate image abuse through existing channels. This is particularly important as in some cases intimate image abuse may be reported by individuals who are not the subject of the image or a person acting on their behalf. Survivors and victims of intimate image abuse may also prefer to report this content through these existing reporting channels if they do not wish to provide their contact details to the service provider, as is required for an intimate image content report under sections 20A and 31A of the Act.

3.16 The duties relating to reporting of intimate image abuse and the existing reporting measures in the Illegal Content Codes both apply to all regulated user-to-user and search services. We therefore propose that both the amended measures and the new measures would apply to all providers of user-to-user and search services.

Effectiveness of the measures

3.17 We consider that together our proposed amendments to the existing reporting measures and our proposed new measures, would effectively enable users and affected persons to easily report intimate image content. Taken together, our proposals would ensure

individuals can identify the appropriate route for reporting intimate image content for certain moderation actions as soon as reasonably practicable, and no later than 48 hours, after receiving the report, and understand the information required for a report to qualify as an intimate image content report.

3.18 Survivors and victims of intimate image abuse currently face significant barriers to reporting content online. Research by Refuge found that reporting processes are often slow or ineffective,[23] while survivors and victims of online violence against women also report challenges navigating reporting mechanisms and understanding what rights and remedies are available to them.[24]

3.19 Our proposals will help address the barriers survivors and victims face when reporting intimate image abuse. Our proposal for reporting routes to be clearly accessible and clearly signposted will ensure that survivors and victims are able to find the appropriate reporting routes. In addition, our proposal to apply existing Measures ICU D2.3-D2.4 and ICS D2.3-D2.4 to intimate image content reports will help to ensure that all users, including those with accessibility needs (in particular those who use keyboard navigation and screen reading technology) are able use this reporting process.

3.20 Further evidence indicates that reporting can be hindered by difficulties in locating harmful content. Survivors and victims of intimate image abuse may be unaware of exactly where the images have been shared or face the burden of reporting multiple images separately.[25] Survivors and victims also report limited opportunities to provide context and inconsistent enforcement of platform policies.[26]

3.21 We consider that making these reporting routes available to affected persons would ensure that survivors and victims do not need to create an account to report intimate image content on a service. In addition, we are recommending service providers enable users and affected persons to easily access details of what information must be given to the service provider for a report to be considered an intimate image content report. This would improve the experience of survivors and victims by ensuring that their reports are more likely to be accepted as intimate image reports and actioned by service provider as soon as reasonably practicable, and no later than 48 hours.

3.22 It is important that providers do not impose unnecessarily onerous information requirements on survivors and victims making intimate image reports, though we recognise that some detail will be needed for a provider to be able to identify and locate the content to take it down. Our proposal that service providers make clear what information is required for an intimate content report would help ensure users and affected persons provide the right level of detail in their report, and service providers only ask for the minimum information necessary.

3.23 Furthermore, our proposal includes the ability for users and affected persons to provide a declaration that the report is made in good faith and, where relevant, on behalf of the victim, rather than asking them to prove that images have been shared without their

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[23] Refuge, 2022. Marked As Unsafe. [accessed 2 November 2026].
[24] The Open University (Jurasz, O), 2024. Online Violence Against Women: A Four Nations Study. [accessed 2 November 2026].
[25] Department for Science, Innovation & Technology and PUBLIC, 2025. Platform Design and the Risk of Online Violence Against Women and Girls. [accessed 15 October 2026].
[26] Refuge, 2022. Marked As Unsafe. [accessed 2 November 2026].

consent. We consider this would help to alleviate the burden of proof on survivors and victims when reporting intimate image abuse.

3.24 Intimate images shared without consent may subsequently be re-shared, requiring survivors and victims to report the same, or related, images multiple times. Our proposed amendments would enable users or affected persons making a report to share sufficient information (and any other supporting information) to enable service providers to identify the reported content, as well as any related content. This should allow users and affected persons to point service providers to multiple pieces of related content through a single intimate image content report, reducing the need for multiple reports. The proposed measures allow service providers flexibility over how they achieve this, which may include the functionality to report several pieces of content at once.

Impacts and costs

3.25 We have considered the one-off cost of amending or implementing reporting systems that allow users and affected persons to easily make intimate image content reports to the service provider. To the extent that these reporting systems are required to comply with the content and search moderation duties imposed by the Act, these costs arise from the statutory duties rather than from our proposed recommendations.

3.26 We have previously estimated the cost of adding a reporting category to an existing content moderation system for user-to-user services to be £900 to £3000.[27] We expect costs to add intimate image content reports would be similar for service providers that already operate a prioritisation and review system.

3.27 In addition to the costs imposed by the Act, we consider that there will be some additional costs for service providers to implement clear signposting to the appropriate route for reporting intimate image content for certain moderation actions as soon as reasonably practicable, and no later than 48 hours. There would also be some additional costs associated with making the information that must be included for a report to be considered an intimate image content report easily accessible to users and affected persons. However, we expect these costs will be relatively low. Service providers already need reporting mechanisms to comply with our existing Code measures that recommend reporting systems should be easy to find, access, and use.[28] Compliance is therefore likely to involve incremental changes to existing reporting systems rather than the creation of new ones.

3.28 Our proposed measures would also give service providers flexibility in how they implement the recommended reporting systems and processes. For example, service providers could integrate intimate image content reports into their existing reporting processes as long as users and affected persons are clearly directed to the appropriate reporting route and are able to submit the information necessary for an intimate image content report, including where they are unable to provide a specific URL for the content. This flexibility would enable providers to implement the measure in a cost-effective manner.

[27] See Additional Safety Measures statement, p.25.
[28] ICU D2 and ICS D2.

Rights assessment

3.29 In summary, we consider that our proposals would have positive impacts on users' and affected persons' rights to freedom of expression and association. We acknowledge that our proposals would interfere with users' and affected persons' privacy. However, we consider this interference is a result of the duties in the Act rather than our proposals and is overall proportionate to the Act's legitimate objective of ensuring users and affected persons are able to easily report intimate image content which these proposals are intended to help service providers to secure.

Freedom of expression and association

3.30 We consider our reporting proposals would positively affect users' and affected persons' rights to freedom of expression and association. For example, recommending service providers have clearly accessible reporting systems and processes that only include reasonably necessary steps (which help service providers to meet the relevant requirements in the Act), as well as signposting the appropriate route for reports and providing certain information to users and affected persons prior to the submission of a report, should enable them to make these types of reports more easily. Our proposed amends to Measures ICU D2.3-D2.4 and ICS D2.3-D2.4 further support this, by ensuring users with accessibility needs can use the process for making intimate image content reports. Users and affected persons should therefore be encouraged to use these processes where appropriate, which empowers them to express themselves and helps to safeguard their rights.

3.31 We also consider that allowing users and affected persons to submit supporting information could positively benefit their rights. This is because users and affected persons may feel that their reports require further information or context to be considered appropriately (and subsequently deemed legitimate) and may consider not reporting if they are unable to provide additional context to strengthen their case. Being able to submit supporting information is an important way of establishing context and therefore may encourage more users and affected persons to use this process if they consider that they will be able to properly express their concerns.

3.32 Potential interference with the rights to freedom of expression and association may arise where the service provider decides, because of a report, to restrict access to material it considers to be intimate image content or restricts users' ability to use the service (for example, by banning or suspending them) on the basis of incorrect identification of the content or incorrect assessments of the nature of the content. This risk may be higher for consensually shared intimate content. We consider that this impact on users can be significantly mitigated by having a mechanism for appealing against incorrect moderation decisions. We consider that the existing appeals measures included in the Illegal Content Codes[29] would enable such a mechanism.

3.33 We acknowledge that there are further limited impacts on service providers' freedom of expression, but consider these are largely because of the requirements of the Act and are proportionate. This is because we have taken a flexible approach to designing our proposals, and it is ultimately up to service providers to determine how to implement the

[29] ICU D8 – D10 and ICS D7 – D9.

recommendations, including how to incorporate them in their existing reporting systems and processes.

Privacy

3.34 We acknowledge the proposed measures, which reflect the statutory requirements, would interfere with users' and affected persons' privacy. Service providers would need to process users and affected persons' personal data and/or private information to process intimate image content reports. Service providers will need to ensure that any personal data is processed in accordance with its obligations under UK data protection legislation, including the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).[30] This includes the data protection principles set out in the UK GDPR, such as lawfulness, fairness and transparency and data minimisation. Providers may wish to consider relevant guidance from the Information Commission (ICO).[31]

3.35 In particular, service providers should note that intimate images are likely to constitute special category data, as they are likely to relate to the sex life or sexual orientation of a person. As such, they must ensure the processing is carried out in accordance with Article 9 of the UK GDPR and should have regard to the ICO's guidance on special category data.[32]

3.36 We consider that service providers can and should implement the proposed measures in a way which minimises the amount of personal data that is processed so that it is no more than is needed to process the report and complaint and respond appropriately, in line with the principle of data minimisation.

3.37 We further note that certain recommendations we have proposed which do not directly replicate statutory requirements – for example, clearly signposting the appropriate route for making intimate image content reports and ensuring users and affected persons can easily access certain information prior to the submission of such a report – would not interfere with users and affected persons' privacy as they do not require the processing of personal data and/or private information.

Conclusion

3.38 We are proposing to amend existing reporting measures ICU D1, ICU D2, ICS D1 and ICS D2 and introduce new reporting measures ICU D3A and ICS D3A recommending that providers of user-to-user and search services operate effective reporting systems and processes in relation to intimate image content reports. These proposals are intended to support the effective compliance with service providers' duty to take down reported intimate image abuse content as soon as reasonably practicable, and no later than 48 hours.

3.39 The proposals seek to provide clarity on how service providers may implement the relevant duties while retaining flexibility for service providers to operate and design reporting systems and processes that are appropriate for their service.

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[30] For further information see UK GDPR guidance and resources from the Information Commission (ICO), including what is content moderation and how does it use personal information? [accessed 20 November 2026].

[31] See guidance from the ICO A guide to the data protection principles | ICO. [accessed 20 November 2026].

[32] See guidance from the ICO Special category data. [accessed 20 November 2026].

3.40 The reporting proposals would help service providers obtain the information needed to identify reported intimate image content and assess whether the duties are engaged, while reducing the barriers survivors and victims face in reporting intimate image abuse.

3.41 Our analysis suggests that most of the costs and impacts on rights associated with our proposed reporting measures are imposed by the statutory requirements of the Act. We consider that any additional costs are likely to be low, especially given our proposals allow service providers flexibility in implementation.

Consultation Question 1:

Do you agree with our proposed reporting methods?

4. Content and search moderation

Introduction

4.1 In this chapter, we set out our proposals to insert a new measure ICU C2A into our Illegal Content user-to-user Codes and a new measure ICS C1A into our Illegal Content search Codes.

4.2 Content moderation refers to user-to-user service providers reviewing content to decide whether it is permitted on their service and taking appropriate action. Search moderation refers to search service providers undertaking the same process for search content.

4.3 These proposed measures closely replicate the statutory requirements and recommend service providers take down, or ensure users can no longer encounter, reported intimate image content as soon as reasonably practicable, and no later than 48 hours, after receiving a report.

4.4 We explain each of the proposed measures individually but given the similarity between them we have combined our assessment of the effectiveness of these proposed measures and their costs and impacts, including their impact on human rights. We also explain why we consider both proposed measures to be proportionate.

4.5 These measures would be in addition to the existing content moderation and search moderation measures in our Illegal Content Codes. Existing measures include those that recommend service providers have a content moderation function that allows for the swift take down of illegal content (for user-to-user services) or that is designed to action illegal content (for search services), set internal moderation policies and performance targets, and resource their moderation functions appropriately.

Explanation of the measures

Content moderation

4.6 Our proposed content moderation measure ICU C2A applies to user-to-user service providers and closely replicates the duties set out in the Act.[33] These state that user-to-user providers should operate a service using proportionate systems and processes designed to take down:

a) content in relation to which an intimate image content report is made to the service provider, and

b) any other content identified by the service provider as the same, or substantially the same, as that content,

as soon as reasonably practicable, and no later than 48 hours, after the service provider receives the report.

[33] Section 10(3A) of the Act.

4.7 This requirement does not apply if the content is not intimate image content, or the person making the report is not the subject of the content or a person acting on their behalf.[34]

4.8 Our proposed measure ICU C2A recommends that providers of user-to-user services have, as part of their content moderation function, systems and processes designed to take down content in relation to which an intimate image content report is made as soon as reasonably practicable, and no later than 48 hours, after receipt of the report unless it is currently not technically feasible for the service provider to take down content.

4.9 The proposed measure ICU C2A also recommends user-to-user service providers take down any other content they identify as being the same as, or substantially the same as, the reported intimate image content. This might include content that has been altered in some way, for example, images that have been cropped or filtered. Service providers would have the flexibility to use any tools or technologies to achieve this.

4.10 We note that this may include the use of hash-matching technology, which can be used to detect content that has previously been identified as illegal including content that is the same, or substantially the same, as content subject to an intimate image content report.[35]

4.11 In line with the statutory requirements, the proposed measure ICU C2A would create an exemption meaning where the reported content is not an intimate image, or the person making the report is not the subject of the content or acting on that person's behalf, the service provider does not have to take down the reported content. However, service providers should accept a declaration that the report is made by the subject of the content, or a person acting on their behalf, as proof of this in the absence of evidence otherwise.

4.12 Reflecting the relevant duties, the proposed measure ICU C2A would apply to providers of all user-to-user services in-scope of the Act, regardless of the service's user base size or risk of intimate image abuse.[36]

Search moderation

4.13 Our proposed search moderation measure ICS C1A applies to search service providers and closely replicates the duties set out in the Act.[37] These state that search service providers should operate a service using proportionate systems and processes designed to ensure that individuals are no longer able to encounter:

a) search content in relation to which an intimate image content report is made to the service provider, and

b) any other search content identified by the service provider as the same, or substantially the same, as that content,

as soon as reasonably practicable, and no later than 48 hours, after the service provider receives the report.

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[34] Section 10(3B) of the Act.
[35] ICU C14 recommends that certain user-to-user service providers use hash matching to detect intimate image abuse.
[36] Although the proposed measure applies to providers of all user-to-user services, the text of the recommendation itself makes clear that we do not expect services to take down content where it is not currently technically feasible for them to achieve this outcome. However, where a service provider claims that it is technically infeasible for it to take down content, we will investigate this. Should we then find that it is technically feasible for the provider to take content down the measure will apply to them.
[37] Section 27(3A) of the Act.

4.14 This requirement does not apply if the content is not intimate image content, or the person making the report is not the subject of the content or a person acting on that person's behalf.[38]

4.15 Our proposed measure ICS C1A recommends that providers of search services have, as part of their search moderation function, systems and processes designed to ensure that users are no longer able to encounter search content in relation to which an intimate image content report is made as soon as reasonably practicable, and no later than 48 hours, after receipt of the report.

4.16 The proposed measure ICS C1A also recommends search service providers ensure that users are no longer able to encounter any other search content they identify as being the same, or substantially the same, as the reported intimate image content. As in the proposed content moderation measure for user-to-user services, search service providers would have the flexibility to use any tools or technologies to achieve this, including hash-matching.[39]

4.17 In line with the statutory requirements, the proposed measure ICS C1A would create an exemption meaning where the reported search content is not an intimate image, or the person making the report is not the subject of the search content or acting on that person's behalf, the service provider does not have to take down the reported content. However, service providers should accept a declaration that the report is made by the subject of the content, or a person acting on their behalf, as proof of this in the absence of evidence otherwise.[40]

4.18 Reflecting the relevant duties, the proposed measure ICS C1A would apply to providers of all search services in-scope of the Act, regardless of the service's user base size.

Effectiveness of the measures

4.19 Our proposed measures ICU C2A and ICS C1A closely replicate the statutory requirements on service providers to take specific actions on intimate image content as soon as reasonably practicable, and no later than 48 hours, after the provider receives the report. We consider that these proposed measures will help address the challenges survivors and victims of intimate image abuse currently face in reporting this content and getting it removed as soon as possible, reducing the spread and prevalence of this content online.

4.20 By closely reflecting the wording of the relevant provisions in the Act, our proposals allow service providers flexibility in their implementation of the statutory requirements. We consider that this flexible approach will better address the spread and prevalence of intimate image abuse content online than a more prescriptive approach, by giving service providers the ability to operate and design moderation systems that are most suitable and effective for their service.

4.21 The proposed measures ICU C2A and ICS C1A would apply to all user-to-user and search services, regardless of user base size or risk of intimate image abuse. We consider this approach to be consistent with Parliament's intent in imposing new duties on all service providers to take specific actions on reported intimate image content as soon as reasonably practicable, and no later than 48 hours, after receipt of a report. This ensures survivors and

[38] Section 27(3B) of the Act.
[39] ICS C8 recommends that large general search service providers use hash matching to detect intimate image abuse.
[40] Evidence otherwise may include consent and ID verification from all individuals depicted in the content.

victims of intimate image abuse can secure the removal of intimate image content, or no longer encounter it, as soon as reasonably practicable, and no later than 48 hours after making a report, regardless of which service the content has been shared on. This is particularly important as evidence shows that intimate image abuse can be shared on a large range of service types, including smaller services.[41] We consider that the systems and processes set out in our proposed measures are necessary for service providers to fulfil these duties and achieve the desired outcome.

Impacts and costs

4.22 Our proposed measures ICU C2A and ICS C1A set out how we recommend service providers meet the requirements set out in the Act to take specific actions on content that is the subject of an intimate image content report as soon as reasonably practicable, and no later than 48 hours, after receipt of a report. Given our proposed measures closely follow the requirements in the Act, we consider the costs associated with the proposed measures are imposed by the Act. The proposed measures also provide service providers with flexibility in how they implement the proposed measures, enabling service providers to minimise costs.

4.23 We consider the one-off costs of implementing the proposed content and search moderation measures to take specific actions on content that is the subject of an intimate image content report to be relatively low. Costs will vary by service provider but will typically include one-off updates to content moderation systems to ensure they capture the recommendations of the measures. For service providers that have already adopted the existing content and search moderation measures set out in the Illegal Content Codes,[42] we expect the incremental cost to implement the relevant measure to be minimal.

4.24 Alongside system maintenance costs, the ongoing costs of the proposed measures are likely to vary based on the number of intimate image content reports different services receive and must take action on. For smaller, lower risk services which receive relatively few intimate image content reports, the costs will likely be lower. For larger or higher risk services which receive more intimate image content reports, the costs will be higher. Given these measures would logically lead to services who receive more reports removing higher volumes of intimate image abuse, the costs of the measures would only increase in direct proportion to the benefits of the measures.

4.25 We recognise there is a risk that service providers receive some intimate image content reports that do not relate to intimate image abuse, and managing these reports could lead to additional costs for service providers and potential impacts on users. For example, providers may bear additional costs associated with managing appeals from users whose content may have been erroneously subject to an intimate image content report.

4.26 Erroneous intimate image content reports may lead to additional costs for service providers in responding. We expect that the number of appeals, and therefore the associated costs, may vary significantly between services. However, these costs are also a byproduct of increased reporting of intimate image abuse and more effective action in response to those reports. We therefore consider the benefits of this measure in reducing the spread and prevalence of intimate image abuse to outweigh any expected costs.

[41] See Section 6 of our Illegal Harms Register of Risks.
[42] ICU C2 (having a content moderation function that allows for the swift take down of illegal content) and ICS C1 (having a search moderation function designed to action illegal content).

Rights assessment

4.27 In summary, we consider our proposed measures could have positive impacts on users' rights to freedom of expression, association and privacy. We also acknowledge that the proposed measures would interfere with these rights. However, we consider this interference is limited and because of the duties in the Act rather than our proposed measures. We consider it is overall proportionate to the Act's legitimate objective of ensuring service providers take moderation action on reported intimate image content as soon as reasonably practicable, and no later than 48 hours, which these proposed measures are intended to help service providers to secure.

Freedom of expression and association

4.28 We acknowledge that the relevant duties, as reflected in our proposed measures ICU C2A and ICS C1A, could interfere with users' rights to freedom of expression and association and service providers' right to freedom of expression as they involve moderation action, including take down, of content shared on services by users. We note that these rights do not prevent the restriction of illegal content. But an interference with these rights, and individuals' commercial interests, could occur if, for example, content is taken down that is:

a) not intimate image abuse i.e. has been shared with the relevant individuals' consent (such as intimate content posted by adult content creators); or
b) not the content that is the subject of the intimate image content report i.e. the service provider identifies the wrong content.

4.29 We consider that the information that must be submitted to a service provider as part of an intimate image content report,[43] which triggers the need to take certain moderation action on this content, limits this interference to an extent. For example, the user or affected person making the report must declare that the content is intimate image content, the report is made by the subject of the content (or a person acting on that person's behalf) in good faith and provide sufficient information about the content for the service provider to identify it. Further, as discussed in Section 3 (reporting) complaints and appeals processes are an important mechanism through which users can inform the service provider if content was shared consensually and/or appeal to have content reinstated.

Privacy

4.30 Sharing intimate images without the consent of the individual or individuals depicted can be a significant and unwarranted intrusion into their privacy, given the sensitive and personal nature of what is portrayed in the image. We consider that the relevant duties, reflected in our proposed measures ICU C2A and ICS C1A, would have a positive impact on these individuals' right to privacy as moderation action on these intimate images would be taken as soon as reasonably practicable, and no later than 48 hours, after the service provider receives a report. This would mean that the images are no longer available on the service and other users are no longer able to access the relevant individuals' private information.

4.31 We acknowledge service providers would need to process individuals' personal data and/or private information in order to identify the reported intimate image so that they can take appropriate moderation action. Service providers will need to ensure that any personal data is processed in accordance with their obligations under UK data protection legislation,

[43] Discussed further in Section 3: Reporting.

including the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).[44] This includes the data protection principles set out in the UK GDPR, such as lawfulness, fairness and transparency and data minimisation. Service providers may wish to consider relevant guidance from the ICO.[45]

4.32 In particular, service providers should note that intimate images are likely to constitute special category data, as they are likely to relate to the sex life or sexual orientation of a person. As such, they must ensure the processing is carried out in accordance with Article 9 of the UK GDPR and should have regard to the ICO's guidance on special category data.[46]

Conclusion

4.33 We are proposing to introduce new content moderation measure ICU C2A for user-to-user services and new search moderation measure ICS C1A for search services. Both measures recommend that service providers operate a moderation function that allows for specific moderation action against content in relation to which an intimate image content report is made as soon as reasonably practicable, and no later than 48 hours, after receiving a report.

4.34 The proposed measures closely replicate the statutory requirements on user-to-user and search service providers set out in the Act. As a result, our proposed measures give service providers flexibility over how they design and operate their content and search moderation functions to achieve the requirements in the Act. This allows service providers to do so in a way that is proportionate and suitable for their service, which we consider will drive effectiveness and reduce the spread and prevalence of intimate image abuse online.

4.35 Our analysis suggests that any costs and impacts on rights associated with our proposed content and search moderation measures are likely to be proportionate and imposed by the statutory requirements of the Act.

Consultation Questions 2 and 3:

- Do you agree with our proposed content moderation measure?
- Do you agree with our proposed search moderation measure?

[44] For further information see UK GDPR guidance and resources from the Information Commission (ICO), including what is content moderation and how does it use personal information? [accessed 20 November 2026].
[45] See guidance from the ICO A guide to the data protection principles | ICO. [accessed 20 November 2026].
[46] See guidance from the ICO Special category data. [accessed 20 November 2026].

5. Complaints

Introduction

5.1 In this chapter, we set out our proposals to insert new complaints measures ICU D12A into our Illegal Content Codes of Practice for user-to-user services and new complaints measure ICS D11A into our Illegal Content Codes of Practice for search services.

5.2 In this context, complaints are the mechanism through which users or affected persons raise concerns about how the service provider has handled an intimate image content report or complied with its related duties.

5.3 The proposed new complaints measures recommend service providers operate an expedited, transparent complaints process that enables those reports and any related complaints to be handled and resolved quickly.

5.4 These proposed new measures would be in addition to the existing complaints measures in our Illegal Content Codes. Existing measures include those that recommend service providers have easy to find, easy to access, and easy to use complaints systems and processes for illegal content and take appropriate action for these complaints.

5.5 We assess the effectiveness of these proposed new measures, their costs and impacts, including their impact on human rights. We also explain why we consider these measures to be proportionate.

Explanation of the measures

5.6 The Act requires service providers to operate an expedited complaints procedure in relation to certain complaints that:

a) are made by users or affected persons who have made an intimate image content report, and

b) are about the content to which the report relates.[47]

5.7 These are:

a) complaints about content present on a service which the user or affected person considers to be illegal content;
b) complaints that the service provider is not complying with a duty set out in sections 10 or 27 of the Act (the illegal content safety duties); and
c) complaints that the service provider is not complying with a duty set out in sections 20 and 31 of the Act (duties about content reporting).

5.8 We are proposing two new measures, ICU D12A for user-to-user services and ICS D11A for search services, reflecting the statutory requirements that the complaints procedure:

- is easy to access, easy to use and transparent; and[48]

[47] Section 21(2A) and Section 32(2A) of the Act.
[48] Section 21(2)(c) and section 32(2)(c) of the Act.

- provides for appropriate action to be taken by the service provider in response to a complaint.[49]

5.9 For user-to-user services, the appropriate action in response to a complaint about the continued presence of intimate image content following an intimate image content report would be taking down the relevant content as soon as reasonably practicable. This is provided that the service provider determines that the content is intimate image content. For search services, the appropriate action would be to ensure that users can no longer encounter the relevant search content as soon as reasonably practicable.

5.10 Where a complaint concerns another aspect of a service provider's compliance with the relevant duties, the proposed measures would recommend that service providers nominate a responsible individual or team to ensure that complaints are directed to an appropriate individual or team to be processed.

5.11 The proposed measures ICU D12A and ICS D11A would also recommend service providers take steps to ensure the complaints systems and processes are 'expedited'. We are proposing that service providers set and record performance targets for resolving complaints made by users or affected persons who have submitted an intimate image content report and whose complaint relates to the content identified in that report. The proposed measures would recommend that these targets are faster than the service provider's target resolution times for resolving complaints about non-compliance. Specifically, this relates to any complaints that the provider is not complying with:

a) the illegal content safety duties,
b) content reporting duties,
c) freedom of expression and privacy duties.[50]

5.12 It does not recommend that these targets are faster than those for resolving complaints about the presence of other types of illegal content, such as child sexual abuse material.[51]

5.13 The proposed measures would not prescribe a specific timeframe within which complaints must be resolved. Instead, service providers would retain flexibility to determine how best to prioritise and manage such complaints, while ensuring that complaints relating to intimate image content reports are handled more quickly than certain other types of complaints.

5.14 The duties relating to an expedited process for complaints relating to intimate image content reports apply to all regulated user-to-user and search services. We are therefore proposing that these measures apply to all providers of user-to-user and search services.

5.15 The expedited complaints procedure does not apply to users who feel their content has been incorrectly removed due to an intimate image content report made by someone else. This is because the relevant duty[52] only relates to complaints made by users or affected persons who have made an intimate image content report and that are about the reported content. This means users whose content is removed or restricted because of an incorrect intimate image content report would not be able to use the expedited complaints

[49] Section 21(2)(b) and section 32(2)(b) of the Act.
[50] Set out in sections 21(4)(b) and 32(4)(b) of the Act.
[51] Section 21(4)(a) and 32(4)(a) of the Act.
[52] See footnote 15.

procedure. However, all users would still be able to appeal takedown decisions through the service provider's existing appeals procedures.[53]

Effectiveness of the measure

5.16 We consider that the proposed measures ICU D12A and ICS D11A would be effective in supporting service providers' compliance with the statutory requirements set out in the Act, namely that complaints procedures should be easy to access, easy to use and transparent, and provide for appropriate action to be taken in response. In our view, ensuring that users and affected persons can readily raise concerns about a service provider's handling of an intimate image content report would provide an important mechanism for identifying and addressing potential failures to comply with the relevant duties. We also consider that providing greater clarity about what may constitute appropriate action in response to a complaint would assist service providers in implementing these complaints duties effectively.

5.17 In addition, we consider that recommending service providers set and record performance targets for resolving complaints relating to intimate image content reports would give practical effect to the requirement for complaints procedures to be expedited. While the Act requires complaints procedures to be expedited, it does not prescribe how service providers should achieve this. Our recommendation therefore provides greater clarity for service providers, while allowing them flexibility to adopt approaches that are appropriate for the nature, size and risk profile of their service. By ensuring that these complaints are resolved more quickly than certain other types of complaints, the proposed measures would support the objective of addressing concerns relating to intimate image content reports on an expedited basis.

5.18 We consider it appropriate to apply our proposed recommendation to set and record performance targets to all regulated user-to-user and search services, including smaller and lower-risk services. This reflects that the duty to operate an expedited complaints procedure applies to all user-to-user and search services in-scope of the Act. We consider setting and recording performance targets for complaints relating to intimate image content reports to be the least onerous way for services to meet the duty that is also consistent with Parliament's intention and satisfies the principles in Schedule 4 of the Act.[54] Schedule 4 states that the measures described in the code of practice must be sufficiently clear, and at a sufficiently detailed level, that providers understand what those measures entail in practice.[55] We think it is important to provide all service providers with this added clarity on what constitutes an 'expedited' complaints procedure. Applying this measure to all services would help to improve the experience of survivors and victims of intimate image abuse in getting this content taken down, and support more consistent outcomes across services. As explained further at 5.21-5.25, we expect the costs associated with this recommendation to be relatively low, as it does not prescribe specific timeframes and

[53] For user-to-user service providers these are set out in ICU D1 (enabling complaints), ICU D8 and D9 (appropriate action for relevant complaints which are appeals) and ICU D10 (appropriate action for relevant complaints which are content appeals – action following determination). For search service providers these are set out in ICS D1 (enabling complaints) ICS D7 and D8 (appropriate action for relevant complaints which are appeals) and ICS D9 (appropriate action for relevant complaints which are appeals – action following determination).

[54] See Annex 1 – Statutory tests and impact assessments for further information.

[55] Paragraph 2(b) of Schedule 4 to the Act

should involve only minimal additional burdens on providers, particularly for service providers receiving low volumes of relevant complaints. We welcome stakeholder feedback on our proposal to apply performance targets to all service providers.

5.19 The proposed measures ICU D12A and ICS D11A do not prescribe a particular prioritisation model. Service providers would retain discretion to determine how individual complaints are prioritised across their services, taking account of the nature and urgency of different complaints. However, service providers would be expected to ensure that complaints relating to intimate image content reports are generally resolved more quickly than the specified categories of other complaints (see paragraph 5.11), thereby giving effect to the requirement for an expedited process.

5.20 We considered recommending intimate image content complaints were also expedited in relation to other types of complaints, including complaints about the presence of illegal content. However, we discounted this approach due to the risk of certain adverse effects. Stating that intimate image content complaints should always be prioritised above all other types of complaints, including about the presence of illegal content would risk hindering providers' ability to respond quickly to other types of illegal content, including complaints about child sexual abuse material or complaints made during crisis events. Instead, our proposed measures ICU D12A and ICS D11A preserve service providers' ability to prioritise complaints about the presence of illegal content on an individual basis.

Impacts and costs

5.21 Implementing an expedited complaints procedure in relation to certain complaints about intimate image content reports is required by the Act. To support service providers in giving effect to that requirement, we have proposed measures for user-to-user and search services that recommend providers introduce performance targets for complaints about intimate image content reports.

5.22 The measures do not prescribe timeframes, operational processes or technical solutions for handling complaints. Instead, they focus on the outcome that complaints relating to intimate image content reports should be handled on an expedited basis. Service providers would therefore retain flexibility to determine how best to organise and prioritise complaints within their existing systems and processes.

5.23 We expect service providers will incur some costs from setting and recording performance targets for resolving complaints made by users or affected persons who have submitted an intimate image content report. For a service provider which does not currently have targets in place, these costs may include one-off implementation costs associated with establishing targets and any necessary data collection or record keeping processes, as well as ongoing costs associated with monitoring performance against those targets.

5.24 We expect the costs of implementing these proposed measures to vary by service and to be lower for providers that have already implemented performance targets under our Illegal Content Codes.[56] We also expect costs to be limited because the proposed measures are outcome-focused and do not require providers to adopt a particular monitoring

[56] ICU D8 for user-to-user services and ICS D7 for search services (appropriate action for determining appeals for large or multi-risk services including monitoring performance against performance targets) and ICU D9 for user-to-user services and ICS D8 for search services (appropriate action for determining appeals for small or low-risk services).

methodology or operational process. For all providers, we expect the cost of the proposed measures to be lower than existing Code measures because any system will only need to track the relative speed of resolving complaints about intimate image content reports, compared to certain other complaints, rather than the accuracy of decision-making.

5.25 We recognise there is a risk that recommending relative performance targets to expedite complaints relating to intimate image content reports could incentivise service providers to resolve other complaints less quickly. However, we consider this risk is limited. The proposed measures do not require providers to prioritise these complaints above all complaints relating to illegal content and therefore preserve flexibility for providers to respond appropriately to complaints that require urgent attention. We consider this approach strikes an appropriate balance between giving effect to the Act's requirement for an expedited complaints procedure and allowing providers to design prioritisation frameworks that reflect the circumstances and risk profile of their services.

Rights assessment

5.26 In summary, we consider that our proposals would have positive impacts on users' and affected persons' rights to freedom of expression and association. We acknowledge that our proposals would interfere with users' and affected persons' privacy. However, we consider this interference is a result of the duties in the Act rather than our proposals and is overall proportionate to the Act's legitimate objective of ensuring there is an expedited complaints procedure for complaints about intimate image content reports, which these proposals are intended to help service providers to secure.

Freedom of expression and association

5.27 We consider our proposed measures ICU D12A and ICS D11A may positively affect users' and affected persons' rights to freedom of expression and association. For example, recommending service providers have an expedited complaints procedure that is easy to access, easy to use and transparent, and which provides for appropriate action to be taken by the service provider in response, should enable users and affected persons to make complaints relating to intimate image content more easily. Users and affected persons should therefore be encouraged to use these processes where appropriate, which empowers them to express themselves and helps to safeguard their rights.

5.28 Additionally, we consider that recommending service providers set and record performance targets for resolving complaints that are faster than for certain other types of complaints and direct the complaint to the appropriate team or individual for processing, should enable the complaints procedure to run more efficiently. This further helps to safeguard users' and affected persons' rights. We also consider that these proposed measures will help give users and affected persons confidence that appropriate action will be taken in response to their complaints in a timely fashion.

5.29 As explained in Section 3 (reporting) in relation to intimate image content reports, a potential interference with the rights to freedom of expression and association may arise where the service provider decides, because of a complaint, to restrict access to material it considers to be intimate image content or restricts users' ability to use the service (for example, by banning or suspending them) on the basis of incorrect identification of the content or incorrect assessments of the nature of the content. This risk may be higher for consensually shared intimate content. We consider that this impact on users can be

significantly mitigated by having a mechanism to allow users to appeal against incorrect takedown decisions, including those made on the basis of an incorrect intimate image content report. As explained at paragraph 5.15, we consider that the existing appeals measures included in the Illegal Content Codes[57] would enable such a mechanism.

5.30 We acknowledge that there are further limited impacts on service providers' freedom of expression, but consider these are largely because of the requirements of the Act and are proportionate. This is because we have taken a flexible approach to designing our proposals, and it is up to service providers to ultimately determine how to implement the recommendations, including how to incorporate them in their existing complaints systems and processes.

Privacy

5.31 We acknowledge the proposed measures, which reflect the statutory requirements, would interfere with users' and affected persons' privacy. Service providers would need to process users and affected persons' personal data and/or private information to process complaints. As explained in Section 3 (reporting), service providers will need to ensure that any personal data is processed in accordance with its obligations under UK data protection legislation, including the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR).[58] This includes the data protection principles set out in the UK GDPR, such as lawfulness, fairness and transparency and data minimisation. Providers may wish to consider relevant guidance from the ICO.[59]

5.32 We consider that service providers can and should implement the proposed measures in a way which minimises the amount of personal data that is processed so that it is no more than is needed to process the complaint and respond appropriately, in line with the principle of data minimisation.

5.33 We further note that the recommendations we have proposed which do not directly replicate statutory requirements – for example, setting and recording performance targets – would not interfere with users and affected persons' privacy as they do not require the processing of personal data and/or private information.

Conclusion

5.34 We are proposing to introduce new complaints measures ICU D12A and ICS D11A recommending that providers of user-to-user and search services operate expedited complaints procedures in relation to intimate image content reports. These proposals are intended to support effective compliance with service providers' corresponding duties in the Act.

5.35 The proposed expedited complaints measures provide service providers with clarity on how an expedited complaints process may be implemented in practice, while preserving flexibility over the design and prioritisation of their wider complaints systems and processes.

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[57] ICU D8 – D10 and ICS D7 – D9.

[58] For further information see UK GDPR guidance and resources from the Information Commission (ICO), including what is content moderation and how does it use personal information? [accessed 20 November 2026].

[59] See guidance from the ICO A guide to the data protection principles | ICO. [accessed 20 November 2026].

5.36 We consider that the additional costs the proposed measures impose on providers strike an appropriate balance between giving effect to the expedited complaints procedure required by the Act while allowing providers flexibility in implementation. Our analysis suggests that any impacts on rights associated with our proposed complaints measures are likely to be proportionate and imposed by the statutory requirements of the Act.

Consultation Question 4:

- Do you agree with our proposed complaints measures?

6. Illegal Content Judgements Guidance

Introduction

6.1 The Illegal Content Judgments Guidance (ICJG) is Ofcom's guidance to support service providers in assessing whether content is illegal content for the purpose of complying with their duties under the Act.

6.2 We are proposing to make minor updates to the following sections of the ICJG to give effect to the new duties regarding intimate image abuse:

- Section 10 Image-based adult sexual offences; and
- Section A11 Adult image-based sexual offences of Annex 1.

Ofcom's proposals

Section 10 Image-based adult sexual offences

6.3 Section 10 of the ICJG gives an overview of image-based adult sexual offences, including intimate image abuse, and guidance about how to make illegal content judgements in relation to them.

6.4 In paragraph 10.35 regarding intimate image abuse, we propose to add "an intimate image content report received from a user or affected person" to the list of examples of the types of evidence which could suggest lack of consent and either lack of reasonable belief in consent or intent to cause alarm, distress or humiliation.

6.5 This would make clear to service providers that receipt of an intimate image content report is evidence of lack of consent.

6.6 We also propose to amend the existing reference to "a user report" in paragraph 10.35 to "another type of user report" to distinguish between this and "an intimate image content report".

6.7 We are also proposing to include user reports, including intimate image content reports, as examples of reasonably available information for providers of user-to-user service and search services to consider in order to make a judgment that the content is intimate image abuse and therefore illegal.

Section A11 Adult image-based sexual offences of Annex 1

6.8 Section A11 Adult image-based sexual offences of Annex 1 contains more detailed legal information on these offences to support the guidance given in Section 10.

6.9 We propose to make the following minor updates to Section A11 of Annex 1 to reflect the recent legislative amendments to the intimate image abuse offences:[60]

[60] See Section 98 and paragraphs 4 to 6 of Schedule 13 to the Crime and Policing Act 2026. We note that the amendments set out in Schedule 13 have been passed by Parliament but are not yet in force. We will therefore not finalise our minor changes to Section A11 of the ICJG until these provisions have been commenced.

- to add reasonable belief that a photograph or film was taken or recorded in public, and "recorded" regarding a photograph or film over which there was no reasonable expectation of privacy, as part of the defences;
- to explain what constitutes a conclusive presumption of the lack of consent (as per section 66B(5A) of the Sexual Offences Act 2003 ("the 2003 Act")), and to include a reference to section 66D(10) and section 76 of the 2003 Act, in the definition of consent;
- to add "altered" to the definitions of film and photograph, to make clear these include images that have been made or altered by computer graphics or in any other way; and
- to add "or as a person with whom it is shared" to the further notes to make clear a provider of an internet service is not to be regarded as a person with whom an intimate image is shared.

Conclusion

6.10 We consider that these minor updates to Section 10 and Section A11 of Annex 1 of the ICJG are necessary to give effect to the new duties regarding intimate image abuse.

6.11 See the Draft Updated Illegal Content Judgements Guidance (relevant extracts) for more detail of these changes.

A1. Statutory tests and impact assessments

Statutory tests

A1.1 In designing the Codes, the Act requires us to have regard to a number of principles and objectives, set out in Schedule 4 to the Act. The Communications Act 2003 Act ("the 2003 Act") also places a number of duties on Ofcom in carrying out our functions, including requiring us to have regard to the risk of harm to citizens presented by content on regulated services.

A1.2 We consider that our proposed new and amended measures meet the requirements set out in Schedule 4 to the Act and section 3 of the 2003 Act. In this section, we take each of the relevant requirements in turn and briefly set out how we have met them in making our proposals.

Duties and principles

The Communications Act 2003

> Section 3(1): It shall be the principal duty of Ofcom, in carrying out their functions: a) to further the interests of citizens in relation to communication matters; and b) to further the interests of consumers in relevant markets, where appropriate by promoting competition.

A1.3 We have set out in this consultation how our proposed changes to the Codes will better protect individuals from the harm caused by intimate image abuse online, as well as improve their experience when reporting this content. This includes harm to various groups of citizens and consumers, in particular harm to survivors and victims (such as women who are disproportionately affected by intimate image abuse) and harm to viewers encountering this illegal content. We have also considered the rights of different groups affected by our proposals.

> Section 3(3): In performing their duties under subsection (1), Ofcom must have regard in all cases to (a) the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, and (b) any other principles appearing to Ofcom to represent best regulatory practice.

A1.4 In the interests of transparency, accountability and fairness we are consulting stakeholders on our proposals, and our consultation includes impact assessments for each of our proposed changes to the Codes.

A1.5 Our proposed changes implement new duties on service providers, which Parliament has determined are necessary to tackle intimate image abuse and protect survivors and victims. Our proposed changes would apply to providers of all regulated user-to-user and search services, in line with the statutory requirements.

> Section 3(2)(g): In carrying out our functions, Ofcom are required to secure the adequate protection of citizens from harm presented by content on regulated services, through the appropriate use by providers of such services of systems and processes designed to reduce the risk of such harm.

In relation to matters to which section 3(2)(g) in the 2003 Act is relevant, section 3(4A) sets out that in performing their duties under subsection (1), Ofcom must have regard to such of the following as appear to them to be relevant in the circumstances:

(a) The risk of harm to citizens presented by content on regulated services.

A1.6 Our proposed changes to the Codes are intended to better protect individuals from the risk of harm caused by intimate image abuse and improve their experience when reporting this content.

(b) The need for a higher level of protection for children than for adults.

A1.7 Our Codes as a whole already ensure a higher level of protection for children than for adults. The proposed changes to the Codes which are the subject of this consultation do not specifically target the protection of children.

(c) The need for it to be clear to providers of regulated services how they may comply with their duties set out under the Act.

A1.8 Our proposed Codes measures, and the explanation in this consultation, aim to provide clarity and tangible steps that service providers can take to meet their duties in the Act while allowing them flexibility to implement the measures in the way that is most suitable and effective for their service. For example, proposed Measures ICU D12A and ICS D11A provide clarity on how to operate an expedited complaints procedure for complaints relating to intimate image content reports, by setting and recording performance targets for resolving these types of complaints that are faster than for certain other categories of complaint.

(d) The need to exercise their functions so as to secure that providers of regulated services may comply with such duties by taking measures, or using measures, systems or processes, which are (where relevant) proportionate to (i) the size or capacity of the provider in question, and (ii) the level of risk of harm presented by the service in question, and the severity of the potential harm.

A1.9 The Act requires us to ensure Code measures are proportionate, and we recognise that the size, capacity, and risks of services differ widely. We have proposed that the measures which are the subject of this consultation would apply to providers of all regulated services, reflecting the underlying statutory requirements. However, noting that the capacity of, and risks posed by, these services can be different, we have designed our proposed measures so that service providers have flexibility in how they apply to them and can do so in a way that makes sense in the context of their service.

(e) & (f) The desirability of promoting the use by providers of regulated services of technologies which are designed to reduce the risk of harm to citizens presented by content on regulated services; and the extent to which providers demonstrate, in a way that is transparent and accountable, that they are complying with their duties.

A1.10 As discussed in Sections 3-54, we have proposed new and amended Code measures which are flexible, so that service providers can apply these to their services in a way that makes sense in the context of their services. This will also allow service providers to use different technological measures in applying the proposed measures and means that they can opt to use the technological means which are the most effective for them.

Section 3(4): Ofcom must also have regard, in performing those duties, to such of the following as appear to them to be relevant in the circumstances […] (b) the desirability of promoting competition in relevant markets, (d) the desirability of encouraging investment and innovation in relevant markets; (h) the vulnerability of children and of others whose circumstances appear to Ofcom to put them in need of special protection; (i) the needs of persons with disabilities, of the elderly and of those on low incomes; (j) the desirability of preventing crime and disorder; (k) the opinions of consumers in relevant markets and of members of the public generally; (l) and the different interests of persons in the different parts of the United Kingdom, of the different ethnic communities within the United Kingdom and of persons living in rural and urban areas.

A1.11 Where appropriate, we have had regard to the desirability of promoting competition and encouraging investment and innovation in proposing changes to the Codes. A number of our proposed measures accordingly provide flexibility for service providers to decide how to achieve compliance. As set out in Sections 3-5, we have considered the interests of consumers in relevant markets as part of our impact assessments of proposed measures, including any indirect impacts on consumers in cases where our measures could affect competition, investment and innovation in respect of the services that they use.

A1.12 We note in particular that our proposed Measures ICU C2A and ICS C1A are recommended for the purpose of complying with illegal content safety duties, which aim to prevent crime and disorder.

A1.13 In our equality impact assessment, we have considered the needs of persons with protected characteristics. We have also considered our Welsh language obligations. For more information, see Annex 1.

Schedule 4, Online Safety Act 2023

Paragraph 2(a): providers of Part 3 services must be able to understand which provisions of the code of practice apply in relation to a particular service they provide.

A1.14 We have clearly identified which services our proposed measures apply to in our Codes and this consultation.

Paragraph 2(b): the measures described in the code of practice must be sufficiently clear, and at a sufficiently detailed level, that providers understand what those measures entail in practice.

A1.15 We have been as clear as possible and included an appropriate level of detail in this consultation and the draft amended Codes. Our approach to the amended Codes strikes the balance between providing certainty about what service providers need to do and allowing them flexibility to implement the measure in a way that works in the context of their own services and is proportionate. While we recognise that some aspects of our proposed measures are not prescriptive, we do not consider they need to be for service providers to understand what they entail in practice.

Paragraph 2(c): the measures described in the code of practice must be proportionate and technically feasible: measures that are proportionate or technically feasible for providers of a certain size or capacity, or for services of a certain kind or size, may not be proportionate or technically feasible for providers of a different size or capacity or for services of a different kind or size.

A1.16 We have considered proportionality and technical feasibility, where appropriate, as part of our assessment of impacts across this document. Our proposed Measures ICU C2A and ICS C1A recommend that service providers take down content in relation to which an intimate image content report has been made, but only when it is technically feasible for them to take down content.

> Paragraph 2(d): the measures described in the code of practice that apply in relation to Part 3 services of various kinds and sizes must be proportionate to Ofcom's assessment under section 98 of the risk of harm presented by services of that kind or size.

A1.17 Parliament has decided to impose certain duties on all providers of regulated services in order to combat the harm caused by intimate image abuse. Our proposed new and amended measures implement those new duties. We have ensured that our proposals are proportionate while still achieving the outcomes intended by those duties. In particular, our impact assessment for each proposed change to the Code, as well as our combined impact assessment, also take into account the cost to service providers as we know additional costs can affect investment and innovation.

Ofcom's online safety objectives

User-to-user services

A1.18 As required by paragraph 3 of Schedule 4 to the Act, we have ensured that the proposed Code measures are compatible with the pursuit of the applicable online safety objectives for user-to-user services as set out in this sub-section.

A1.19 All our proposals, in line with paragraph 11 of Schedule 4 to the Act, relate only to the design or operation of a Part 3 service (a) in the UK, or (b) as it affects UK users of the service.

> Paragraph 4(a)(i): a service should be designed and operated in such a way that the systems and processes for regulatory compliance and risk management are effective and proportionate to the kind and size of service.

A1.20 The Codes already include measures related to governance and accountability, and we are not proposing to change these.

> Paragraph 4(a)(ii): a service should be designed and operated in such a way that the systems and processes are appropriate to deal with the number of users of the service and its user base.

A1.21 Our proposed new and amended Code measures would apply to providers of all regulated user-to-user services, reflecting the underlying statutory requirements.

A1.22 Our existing content moderation, automated content moderation and reporting and complaints measures were set having regard, among other things, to the number of users of the services and its user base.

> Paragraph 4(a)(iii): a service should be designed and operated in such a way that United Kingdom users (including children) are made aware of, and can understand, the terms of service.

A1.23 The Codes already contain measures related to terms of service and we are not proposing to change these.

Paragraph 4(a)(iv): a service should be designed and operated in such a way that there are adequate systems and processes to support United Kingdom users.

A1.24 The reporting and removal of intimate image abuse supports UK survivors and victims of intimate image abuse and more generally UK users from encountering this illegal content. The expedited complaints procedure also supports users and affected persons who have made an intimate image content report. As set out in our consultation, individuals whose consensual content is wrongly removed can use existing appeals mechanisms to have their content reinstated.

Paragraph 4(a)(vi): a service should be designed and operated in such a way that the service provides a higher standard of protection for children than for adults.

Paragraph 4(a)(vii): a service should be designed and operated in such a way that the different needs of children at different ages are taken into account.

A1.25 As set out at A1.7, our Codes as a whole already ensure a higher level of protection for children than adults. The proposals which are the subject of this consultation do not specifically target the protection of children.

Paragraph 4(a)(viii): a service should be designed and operated in such a way that there are adequate controls over access to the service by adults.

Paragraph 4(a)(ix): a service should be designed and operated in such a way that there are adequate controls over access to, and use of, the service by children, taking into account use of the service by, and impact on, children in different age groups.

A1.26 Our Illegal Content Codes include measures to limit the access of a terrorist organisation proscribed by the UK government. In our December 2024 Statement we set out why we do not consider it appropriate to restrict access to services generally by adults.

A1.27 In our April 2025 Statement on our Protection of Children Codes, we explained how our Age Assurance take into account the use of the service by, and impact on, children in different age groups. In relation to our content moderation measures and recommender systems measures we also explained that service providers should consider children's ages as a factor when designing the part of their system relating to the appropriate action.

Paragraph 4(b): a service should be designed and operated so as to protect individuals in the United Kingdom who are users of the service from harm, including with regard to:

- algorithms used by the service,
- functionalities of the service, and
- other features relating to the operation of the service.

A1.28 The proposed new measures, and amendments to measures, are intended to protect individuals from illegal intimate image abuse content. Our proposals provide that content subject to an intimate image content report should be taken down as soon as reasonably practicable and no later than 48 hours after the service provider receives such a report. This protects both survivors and victims and users of the service more generally from seeing the illegal content.

Search services

A1.29 As required by paragraph 3 of Schedule 4 to the Act, we have ensured that our proposed measures are compatible with the pursuit of the applicable online safety objectives as set out in this sub-section.

A1.30 In line with paragraph 11 of Schedule 4 to the Act, they relate only to the design or operation of a Part 3 service (a) in the United Kingdom, or (b) as it affects United Kingdom users of the service.

Paragraph 5(a)(i): a service should be designed and operated in such a way that the systems and processes for regulatory compliance and risk management are effective and proportionate to the kind and size of service.

A1.31 The Codes already include measures related to governance and accountability, and we are not proposing to change these.

Paragraph 5(a)(ii): a service should be designed and operated in such a way that the systems and processes are appropriate to deal with the number of users of the service and its user base.

A1.32 Our proposed new and amended Code measures would apply to providers of all regulated search services, reflecting the underlying statutory requirements.

Paragraph 5(a)(iii): a service should be designed and operated in such a way that United Kingdom users (including children) are made aware of, and can understand, the publicly available statement referred to in sections 27 and 29.

A1.33 In our December 2024 Statement and our April 2025 Statement, we set out recommended measures that, among other things, are designed to ensure the publicly available statement is accessible to children.

Paragraph 5(a)(iv): a service should be designed and operated in such a way that there are adequate systems and processes to support United Kingdom users.

A1.34 Ensuring individuals can no longer encounter intimate image abuse and can report this content as well as access an expedited complaints procedure in relation to these reports, supports UK survivors and victims. It also more generally supports UK users as its stops them from viewing this illegal content.

Paragraph 5(a)(v): a service should be designed and operated in such a way that the service provides a higher standard of protection for children than for adults.

Paragraph 5(a)(vi): a service should be designed and operated in such a way that the different needs of children at different ages are taken into account.

A1.35 As set out at A1.7, our Codes as a whole already ensure a higher level of protection for children than adults. The proposals which are the subject of this consultation do not specifically target the protection of children.

Paragraph 5(b): a service should be assessed to understand its use by, and impact on, children in different age groups.

A1.36 As set out in our April 2025 Statement, service providers have a duty, as part of their children's risk assessment, to assess their user base, including the number of children in

different age groups on the service. Additionally, service providers must assess the impact of the risk of harm to children in different age groups on their services.

Paragraph 5(c): a search engine should be designed and operated so as to protect individuals in the United Kingdom who are users of the service from harm, including with regard to:

- algorithms used by the search engine,
- functionalities relating to searches (such as a predictive search functionality), and
- the indexing, organisation and presentation of search results.

A1.37 We consider our proposed changes to the Codes as set out in this consultation will protect users of the service from harm caused by intimate image abuse (as well as other individuals who are not users of the service).

Other duties

A1.38 Under section 92(2) of the Act, Ofcom must have regard to the Secretary of State's statement of strategic priorities for online safety[61] when carrying out online safety functions. We have had regard to this statement, which was designated on 2 July 2025, and have taken it into account in formulating the proposals set out in this consultation.

Combined impact assessment

A1.39 In the preceding sections we have assessed the impacts of each of the proposed measures and concluded they are proportionate. We will now consider the combined impact of the proposed measures by looking at:

a) Whether each proposed measure has distinct benefits that contribute to how the overall package reduces risks of illegal harms and the extent to which the benefits of different measures overlap. This informs our view on whether the combined benefit of the package of proposed measures may be less than indicated when considering measures individually.
b) Whether the overall regulatory burden is proportionate, particularly for smaller, lower risk services. In assessing this, we recognise that even where the cost of individual proposed measures may not be significant, the cost of the whole package may be significant for some service providers.

A1.40 The proposed measures covering reporting, content and search moderation, and expedited complaints each address a separate aspect of the statutory requirements and therefore bring a distinct impact to users. As a package, these measures act in a complementary way to help reduce the spread and prevalence of intimate image abuse and keep users safe. Removing any individual measure would diminish the overall effectiveness of the package. For example, the proposed measures ICU D1, ICU D2, ICU D3A, ICS D1, ICS D2 and ICS D3A requiring service providers to allow users and affected persons to easily make an intimate image content report does not ensure that providers will take action following the report in the appropriate timeframe. Similarly, the proposed measures ICU C2A and ICS C1A requiring service providers to operate proportionate systems and processes designed to

[61] Department for Science, Innovation and Technology, 2025. Statement of Strategic Priorities for Online Safety. [accessed 15 October 2026].

take down content in relation to which an intimate image content report is made does not ensure that users and affected persons can easily submit a report.

A1.41 We therefore consider that each proposed measure addresses a separate risk and contributes to the overall effectiveness of the package.

A1.42 Most of our proposed measures are a direct result of specific requirements in the Act. Where we have imposed measures beyond those requirements, we expect the combined cost of these measures to be relatively low.

A1.43 We have considered the extent to which the proposed measures overlap with existing requirements under the Act and with measures in Ofcom's existing Illegal Harms Codes. Many service providers may already operate reporting systems, complaints procedures, content or search moderation systems and performance monitoring arrangements to comply with existing duties. We therefore expect the overall incremental cost of the measure proposed in this consultation to be relatively low for many service providers.

A1.44 We also proposed minor amendments to Section 10 Image-based adult sexual offences and corresponding section in the annex of the ICJG. We consider that these amendments are proportionate as they reflect the relevant legislative provisions and are required to give effect to the new duties regarding intimate image abuse.

A1.45 We have also had regard to the desirability of promoting economic growth in accordance with the Growth Duty.[62] While the purpose of these proposals is to implement protections against intimate image abuse, rather than to promote economic growth, we have nevertheless sought to ensure that these protections are implemented in the most proportionate way, so as to minimise any impact on economic growth. We consider that the proposals do not impose an unnecessary regulatory burden on service providers and that the regulatory action is underpinned by legislation.

A1.46 In summary, we consider the overall package of proposed measures to be proportionate. Our assessment shows that each measure has distinct benefits and contributes to ensuring service providers take down reported intimate image content in the recommended timeframe, enable these reports to be made easily and operate an expedited complaints procedure in relation to these reports.

Equality impact assessment

A1.47 Section 149 of the Equality Act 2010 ('the 2010 Act') imposes a duty on Ofcom, when carrying out its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and other prohibited conduct related to the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex and sexual orientation. The 2010 Act also requires Ofcom to have due regard to the need to advance equality of opportunity and foster good relations between persons who share specified protected characteristics and persons who do not.

A1.48 Ofcom has separate but complementary duties under Section 75 of the Northern Ireland Act 1998 ('the 1998 Act'). This requires Ofcom to screen policies for their impact on equality of opportunity and/or good relations in each of the nine equality categories identified for Northern Ireland.

[62] Section 108 of the Deregulation Act 2015.

A1.49 To help us comply with our duties under the 2010 Act and the 1998 Act, we assess the impact of our proposals on persons sharing protected characteristics and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations.

A1.50 When thinking about equality we consider the potential impacts more broadly and not just in relation to those groups of persons that share protected characteristics identified in equalities legislation (see paragraph 4.7 of our Impact Assessment Guidance). [63]

A1.51 In particular, section 3(4) of the Communications Act 2003 also requires us to have regard to the needs and interests of specific groups of persons when performing our duties, as appear to us to be relevant in the circumstances. These include:

a) the vulnerability of children and of others whose circumstances appear to us to put them in need of special protection;

b) the needs of persons with disabilities, older persons and persons on low incomes; and

c) the different interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.

A1.52 We examine the potential impact our policy is likely to have on people, depending on their personal circumstances. This also assists us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers.

A1.53 Our proposals aim to improve online safety and improve the experiences of survivors and victims of intimate image abuse by improving reporting, complaints and takedown processes and enabling the faster removal of harmful content. The available evidence indicates that women are disproportionately affected by intimate image abuse and so they are likely to have particular benefits for women. However, it is not just women who are affected by intimate image abuse. There are some types of intimate image abuse which disproportionately affect men, including sextortion, and the proposals are also likely to have particular benefits for survivors and victims of sextortion.

A1.54 Our proposals regarding the accessibility of systems and processes for making intimate image content reports – such as ensuring they are usable for those dependent on assistive technologies – would have a positive impact on people with certain disabilities.

A1.55 We have not identified any likely adverse impacts on people with protected characteristics and do not consider the proposals are likely to result in discrimination, harassment or victimisation. The measures apply to regulated services irrespective of users' characteristics and are intended to improve outcomes for all survivors and victims of intimate image abuse. We have considered the risk that malicious intimate image content reports could be used to try and take down consensual intimate content, such as content associated with sex workers or adult content creators. There is a risk this content could be submitted by competitors seeking to cause commercial harm or by individuals who ideologically oppose, for example, sex work. These impacts are more likely to be felt by women, given that they make up the majority of sex workers and adult content creators. However, as noted in our rights assessments for the proposed measures, the impact on users would be significantly mitigated by having a mechanism to allow users to appeal

[63] Ofcom, 2023. Impact assessment guidance.

against incorrect takedown decisions. We consider that the existing appeals measures included in the Illegal Content Codes[64] would enable such a mechanism.

A1.56 Overall, we consider the proposals are likely to make a positive impact by improving the experience and outcomes of survivors and victims of intimate image abuse. The measures are expected to support quicker intervention, more effective redress and a more consistent user experience when reporting intimate image abuse content. While the evidence suggests that women may particularly benefit, given they are disproportionately targeted by this harm, the proposals will deliver benefits more broadly across users.

A1.57 We will update this assessment following the consultation period, to reflect stakeholder feedback and any changes to policy proposals.

Welsh language impact assessment

A1.58 The Welsh language has official status in Wales. To give effect to this, certain public bodies, including Ofcom, are required to comply with Welsh language standards.[65] Accordingly, we have considered:

- the potential impact of our policy proposals on opportunities for persons to use the Welsh language;
- the potential impact of our policy proposals on treating the Welsh language no less favourably than the English language; and
- how our proposals could be formulated so as to have, or increase, a positive impact, or not to have adverse effects or to decrease any adverse effects.

A1.59 We do not consider that these proposals will have any adverse effects on opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than English.

A1.60 The proposals are focused on online service providers' systems and processes for enabling reporting, moderating content and handling complaints in relation to intimate image abuse content. Our proposals are language-neutral and do not affect how users communicate online or access services in Welsh.

A1.61 The proposals will have a positive effect for all users, including Welsh language users, by supporting faster action against intimate image abuse content and improving access to reporting and complaints mechanisms.

A1.62 We have not identified any changes that would be required to increase positive effects or mitigate adverse effects for Welsh language users. However, we welcome stakeholder views on whether any aspect of the proposals could have implications for Welsh language users.

[64] ICU D8 – D10 and ICS D7 – D9.

[65] The Welsh language standards with which Ofcom is required to comply are available on our website. Source: Welsh Language Commissioner, 2016. Compliance Notice – Section 44 Welsh Language (Wales) Measure 2011.

A2. Legal framework

A2.1 We set out in this Annex the statutory basis of Ofcom's role and the issues we must consider when preparing Codes under the Online Safety Act 2023 (the Act).

The Online Safety Act 2023 and the Codes of Practice

A2.2 The Act is a set of laws designed to protect all United Kingdom (UK) users online, including children, by placing duties on a range of user-to-user and search service providers. The duties on service providers include identifying, mitigating and managing the risk of harm caused by illegal content and activity, including intimate image abuse.

A2.3 The Act establishes Ofcom as the regulator responsible for online safety. It places a requirement on us to prepare and issue Codes,[66] which are a package of measures recommended for service providers to comply with their safety duties.

A2.4 We have issued four Codes that collectively meet this obligation: (1) the Illegal Content user-to-user Codes; (2) the Illegal Content search Codes;[67] (3) the Protection of Children user-to-user Code; and (4) the Protection of Children search Code.[68] Taken as a whole, the measures set out in these Codes address a range of illegal harms, for both adults and children, that are identified as priorities in the Act.

A2.5 The safety duties in the Act only apply to the design, operation and use of services in the UK.[69] They also apply to the design, operation and use of a service as it affects UK users (i.e., duties that relate to users).[70] The Code measures must therefore relate to the design or operation of a service that operates in the UK and/or as it affects UK users of the service.[71]

A2.6 Service providers can implement Code measures to be compliant with their obligations in the Act. These Codes are a "safe harbour", which means that service providers who implement all applicable measures will be treated as compliant with their relevant duties under the Act.[72]

A2.7 However, service providers may choose to take alternative measures to comply with the relevant duties rather than following the recommended measures in the Codes. In these cases, a service provider needs to retain a record of decisions relating to those alternative measures and explain how the relevant safety duties have been met. They are also expected to carefully consider the rights of users, including the right to freedom of expression and privacy.[73]

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[66] Section 41 of the Act. Ofcom must prepare and issue Codes of Practice for providers of user-to-user and search services covering terrorism content, child sexual exploitation and abuse content, as well as one or more Codes for the purpose of compliance with other relevant duties (including but not limited to the offences specified in Schedule 7 of the Act).
[67] Ofcom, 2024. Statement: Protecting People from Illegal Harms Online.
[68] Ofcom, 2025. Statement: Protecting Children from Harms Online.
[69] This is defined in section 4 of the Act.
[70] Section 8(3) of the Act.
[71] Schedule 4 to the Act, paragraph 11.
[72] Section 49(1) of the Act.
[73] Sections 22 and 33 of the Act. Service providers who take or use the relevant recommended measures that incorporate safeguards to protect users' rights to freedom of expression within the law, and to protect the

Ofcom's duties and online safety functions

A2.8 This section sets out the statutory basis of Ofcom's role and the issues we must consider when drafting or amending the Codes.

Ofcom's general duties under the Communications Act 2003

A2.9 Ofcom is the independent regulator for communications services. We have regulatory responsibilities for the telecommunications, post and broadcasting sectors, as well as for online services.

A2.10 As a public authority, Ofcom must act lawfully, rationally and fairly.

A2.11 The Communications Act 2003 (the 2003 Act) places duties on Ofcom that need to be fulfilled when exercising our regulatory functions, including for online safety. The 2003 Act sets out our principal duty is:

a) To further the interests of citizens in relation to communication matters; and
b) To further the interests of consumers in relevant markets, where appropriate by promoting competition.[74]

A2.12 In performing that principal duty, the 2003 Act sets out that Ofcom's regulatory activities need to be transparent, accountable, proportionate, consistent and targeted only at cases where action is needed.[75] We further need to ensure that UK citizens are properly protected from harm caused by content on regulated services. We achieve this by requiring service providers to use suitable systems and processes that help minimise the risk of harm.

A2.13 The 2003 Act further requires[76] that Ofcom must have regard to several factors, as they appear to us to be relevant in the circumstances[77]:

a) The risk of harm to UK citizens presented by regulated services;
b) The need for a higher level of protection for children than for adults;
c) The need for it to be clear to providers of regulated services how they may comply with their duties under the Act;
d) The need to exercise our functions to secure that providers may comply with such duties by taking or using measures, systems or processes which are proportionate to the size or capacity of the provider and the level of risk (and potential severity) of harm presented by the service;

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privacy of users, respectively, will be treated as having complied with the freedom of expression and privacy duties (Section 49(2) and (3) of the Act).

[74] Section 3(1) of the 2003 Act.

[75] Section 3(3) of the 2003 Act. We must also have regard to any other principles appearing to us to represent best regulatory practice.

[76] Section 3(4A) of the 2003 Act.

[77] In relation to matters to which section 3(2)(g) is relevant. Section 3(4) of the 2003 Act sets out other matters to which Ofcom must, to the extent they appear to us relevant in the circumstances, have regard, in performing our duties. They include: the desirability of promoting competition and encouraging investment and innovation in relevant markets; the vulnerability of children and of others whose circumstances put them in need of special protection; the needs of persons with disabilities, the elderly and of those on low incomes; the desirability of preventing crime and disorder; the opinions of consumers and of members of the public generally; and the different interests of persons in the different parts of the UK and of the different ethnic communities within the UK.

e) The desirability of promoting the use of technologies which are designed to reduce the risk of harm to citizens; and
f) The extent to which providers demonstrate, in a way that is transparent and accountable, that they are complying with their duties.

A2.14 In line with our additional duties under the 2003 Act,[78]

we have also considered the vulnerability of children and of others whose circumstances put them in need of special protection. We have considered:

a) The needs of disabled people, older people, and of those on low incomes;
b) The opinions of consumers and of members of the public generally;
c) The interests of persons in the different parts of the UK; and
d) The interests of the different ethnic communities within the UK.

Schedule 4 and additional Illegal Content Codes considerations

A2.15 The Act sets out that in drafting or amending the Codes, Ofcom must consider the appropriateness of the measures we recommend to different kinds and sizes of services and to providers of differing sizes and capacities.[79]

A2.16 We must also have regard to the following principles:

a) Providers must be able to understand which measures apply to their service;
b) The measures must be sufficiently clear, and at a sufficiently detailed level, that providers understand what they entail in practice;
c) The measures must be proportionate and technically feasible; and
d) The measures must be proportionate to our assessment of the risk of harm presented by services of that kind or size.

A2.17 We must also ensure that the measures described in the Codes are compatible with the pursuit of the list of online safety objectives[80], and that we include measures relating to each of the areas specified in sections 10(4) and 27(4) (concerning illegal content).

A2.18 Any measures described in the Codes which are recommended for the purpose of compliance with any of the relevant duties[81] must be designed in the light of the following principles (and where appropriate incorporate safeguards for the protection of the matters mentioned in those principles):

a) the importance of protecting the right of users and (in the case of search services or combined services) interested persons to freedom of expression within the law, and
b) the importance of protecting the privacy of users.[82]

[78] Section 3(4) of the 2003 Act.
[79] Paragraph 1 of Schedule 4 to the Act. Also see Annex 1 Statutory Tests and Impact Assessments.
[80] As set out in Schedule 4 to the Act.
[81] "Relevant duties" includes the illegal content duties set out in sections 10 and 27 of the Act.
[82] Paragraphs 10(1) and 10(2) of Schedule 4 to the Act. Paragraph 10(3) explains that the reference to protecting the privacy of users is to protect users from a breach of any statutory provision or rule of law concerning privacy that is relevant to the use or operation of a user-to-user or search service (including any provisions concerning the processing of personal data).

Impact Assessments

A2.19 Under the 2003 Act, Ofcom is required to conduct impact assessments when preparing a Code or amendment to a Code.[83] This must include an assessment of the likely impact of implementing the proposal on small and micro-businesses.[84]

A2.20 Ofcom has discretion as to the substance and form of an impact assessment.[85] Our impact assessment guidance sets out our general approach to how we assess and present the impact of our proposed decisions.[86]

Illegal Content Judgements Guidance

A2.21 The Act requires Ofcom to publish various forms of guidance. This includes guidance to support service providers in understanding their regulatory obligations when assessing whether content is illegal content for the purposes of their risk assessment and safety duties.[87] Ofcom has published the Illegal Content Judgements Guidance (ICJG) in compliance with this duty.[88]

A2.22 Ofcom is required to consult before producing or revising this guidance, and to thereafter publish the guidance.[89]

The Deregulation Act 2015

A2.23 Ofcom is required, when exercising our regulatory functions, to have regard to the desirability of promoting economic growth, including through considering the importance of ensuring the regulatory action we take is necessary and proportionate.[90] This duty is referred to as the "growth duty". The growth duty has applied to our online safety functions since 6 April 2026.[91]

A2.24 We are also required to have regard to the Government's statutory guidance on the growth duty.[92] That guidance explains that the duty needs to be considered alongside our other statutory duties, and that its purpose is not to achieve or pursue economic growth at the expense of necessary protections.[93] Among other things, it also identifies particular drivers of economic growth, including innovation, investment and competition.

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[83] Section 7 of the 2003 Act, as amended by section 93 of the Act.
[84] Sections 7(4A) and 7(4B) of the 2003 Act, as amended by section 93(4) of the Act.
[85] Section 7(5) of the 2003 Act.
[86] See Ofcom, 2023. Impact Assessment Guidance.
[87] Section 192 of the Act.
[88] See Ofcom, 2026. Illegal Content Judgements Guidance.
[89] Section 193 of the Act.
[90] Section 108 of the Deregulation Act 2015.
[91] The Economic Growth (Regulatory Functions) (Amendment) Order 2024 (SI 2024/587), which removed the exclusion for Ofcom's online safety functions from 6 April 2026.
[92] Section 110(3) of the Deregulation Act 2015.
[93] Department for Business and Trade, 2024. Growth Duty: Statutory Guidance – Refresh. [accessed 20 November 2026].

A3. Responding to this consultation

How to respond

A3.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on **20 January 2027**.

A3.2 We invite respondents to submit their views through our online consultation webform, which provides a digital route for responding to this consultation.

A3.3 Alternatively, you can download a response form from https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/intimate-image-abuse-takedown. You can return this by email or post to the address provided in the response form.

A3.4 If your response is a large file, or has supporting charts, tables or other data, please email it to IIAtakedownconsultation@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet. This email address is for this consultation only and will not be valid after 20 January 2027.

A3.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:

- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
- upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.

A3.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)

A3.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.

A3.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.

A3.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 6. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

A3.10 If you want to discuss the issues and questions raised in this consultation, please email IIAtakedownconsultation@ofcom.org.uk.

Confidentiality

A3.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.

A3.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.

A3.13 If someone asks us to keep all or part of a response confidential, we will treat this request seriously and try to respect it. It is however for Ofcom to decide whether or not information is confidential. Sometimes we may consider it necessary to publish all or part of a response, including those that are marked as confidential (for example, so we can explain our decisions and people can understand our reasoning or in order to meet legal obligations).

Where this is the case (and the relevant information is not already in the public domain), we will normally first explain our intention to publish information from your response and give you the opportunity to raise concerns about the proposed publication. We will generally try to resolve any objections you may have through constructive dialogue. If we remain of the view that we need to publish all or part of your response and you continue to object, we will give you advance warning prior to publication.

A3.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.

A3.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

A3.16 Following this consultation period, Ofcom plans to publish a statement in mid-2027.

A3.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

A3.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex x.

A3.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.

A3.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A4. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

1. Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

2. We will be clear about whom we are consulting, why, on what questions and for how long.
3. We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
4. When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses.
5. A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
6. If we are not able to follow any of these principles, we will explain why.

After the consultation

7. We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A5. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- Nothing ☐
- Name/contact details/job title ☐
- Whole response ☐
- Organisation ☐
- Part of the response ☐

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes ☐ No ☐

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Signed (if hard copy)

A6. Consultation questions

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

Question 1:

- Do you agree with our proposed reporting measures?

Question 2:

- Do you agree with our proposed content moderation measures?

Question 3:

- Do you agree with our proposed search moderation measures?

Question 4:

- Do you agree with our proposed complaints measures?

Question 5

- Do you have any further comments on our proposed approach to implementing the new duties relating to intimate image abuse, including our proposed amendments to the Codes of Practice and ICJG?