

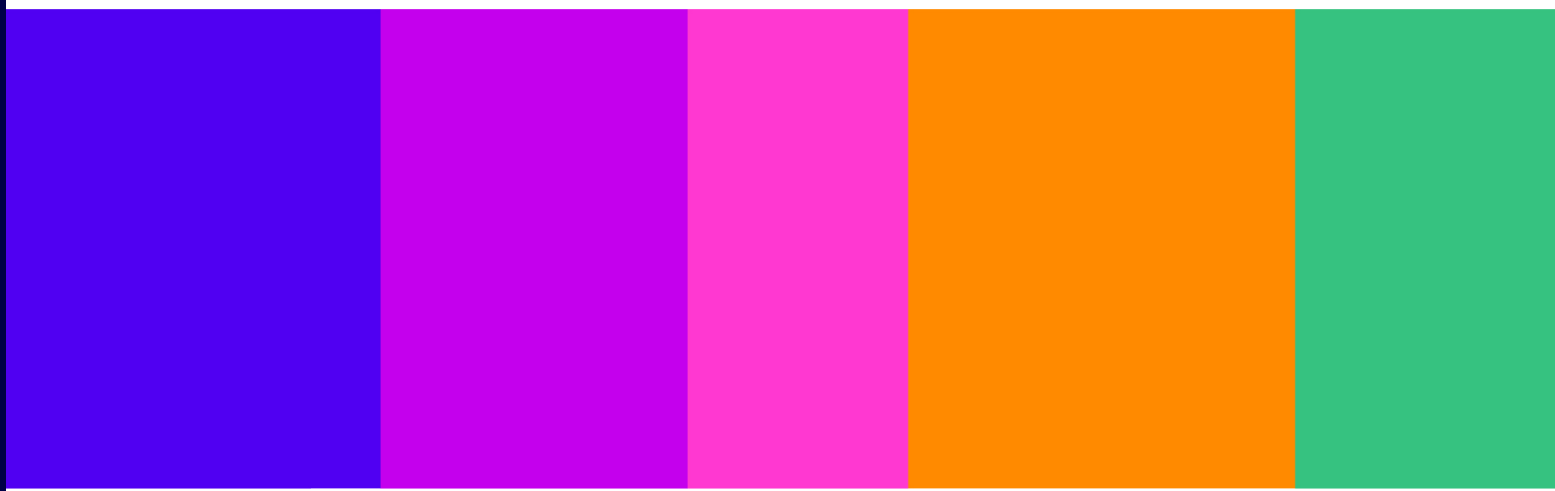
# Protecting children from harms online

---

Volume 1: Overview, scope and regulatory  
approach

**Statement**

Published 24 April 2025



# Contents

---

## Section

1. Overview.....	3
2. Scope of this statement .....	8
3. Our approach to protecting children online .....	21

# 1. Overview

## What we are doing

---

After considering responses to our consultation, we are publishing our decisions about protecting children online. We are also publishing final versions of our guidance explaining what online services need to do to comply with their duties to protect children. Alongside this, we are publishing the Protection of Children Codes of Practice, which set out the steps that we expect online services to take to keep children safe.

Children in the UK benefit from the opportunities that technology offers and enjoy being online for many reasons, including learning, friendships, and entertainment. However, most children have encountered harmful content and activity online. Ofcom's Online Experience Tracker shows that six in ten (59%) teenage children aged 13-17 reported encountering potentially harmful content online over a four-week period. This can have serious impacts on their mental and physical wellbeing and has been linked to the deaths of some children.

Securing a higher level of protection for children than for adults online is one of the objectives of the Online Safety Act. The decisions set out in this statement form the foundations for creating a safer life online for children in the UK. They build on the rules that we have already put in place to protect all users, including children, from illegal harms such as protecting children from being groomed and sexually exploited. They also complement the rules about preventing children from encountering pornography online. We have already begun to drive compliance with these new rules, including opening enforcement programmes.

Our decisions reflect what we know from research and evidence about risks to children and what works to keep them safe. Our Children's Register of Risks brings together around 550 individual sources of evidence, including new sources suggested by stakeholders in their responses to our consultation. Through our research, we have heard from over 27,000 children and 13,000 parents. We have also listened carefully to what children told us in a deliberative engagement programme that involved consultation workshops and interviews with children around the UK. We have reflected their views in our decisions alongside those of the companies, children's safety campaigners and other organisations that responded to our consultation.

## What will change

---

This package of guidance and safety measures is a big step forward in creating a safer life online for children in the UK.

As services start to implement safety measures in line with the Codes, children will no longer be able to access sites that carry the most harmful kinds of content, starting with pornography services. Adults will be asked to verify their age in order to access content which is legal but harmful to children.

Children can expect to see a reduction in the amount of harmful content they encounter online, as a result of services implementing processes to prevent their algorithms from recommending harmful content to children and taking swift action when they become aware of harmful content.

Children, and the adults who care for them, should be able to rely on clear terms and conditions, as well as accessible processes to report harmful content. As services adopt these measures, users will see changes to the information and processes they use online. Children will have access to tools that give them more control over their online experiences and supportive information.

These safety measures are underpinned by good governance and risk management. They complement the measures that are already in force to protect all users, including children, from illegal content – for example, default user settings that make it more difficult for adults to contact and exploit children.

By now, all services must have carried out assessments to determine whether they are in scope of the children’s safety duties. We anticipate that most services not using highly effective age assurance will be in scope of the regulatory package we are confirming today.

Services in scope of the children’s safety duties now have until 24 July 2025 to complete and record their children’s risk assessments, as explained in the Children’s Risk Assessment Guidance. This will complement the illegal content risk assessments that services have already completed.

As part of their children’s risk assessments, services must assess the risks of children encountering harmful content, including content categories not listed in the Act. They must also consider children in different age groups as part of their risk assessment.

Our Children’s Risk Profiles help services to understand the service types and functionalities that can be particularly risky for children. Our Children’s Register of Risks provides information on how risks of harm to children manifest online; and our Guidance on Content Harmful to Children will support service providers in interpreting the different categories of harmful content.

After completing their children’s risk assessments, services must implement safety measures to mitigate the risks to children identified in these assessments. The Codes include measures that we expect services to take in order to address the risks to children, which include:

- **Robust age checks.** At present, it is far too easy for children to access harmful content online. We expect the riskiest services to use highly effective age assurance to protect children from this content. If services have minimum age requirements and are not using highly effective age assurance to prevent children under that age using the service, they should assume that younger children are on their service and take appropriate steps to protect them from harm.
- **Safer algorithms.** Personalised recommendations are currently children’s main pathway to encountering harmful content online. Service providers that have identified a medium or high risk of such content will be expected to configure their algorithms to ensure children are not presented with the most harmful content and take appropriate action to protect them from other harmful content.
- **Effective moderation.** We expect all services to have content moderation systems in place to take swift action against content harmful to children when they become aware of it.
- **User reporting and complaints.** Service providers need to make sure their processes are easy to access and use, increase transparency, and take appropriate action when users report harmful content.
- **Terms of service.** We will expect service providers to make sure their terms and conditions are clear and easy for children to understand.

- **More choice and support for children.** As well as easy-to-use reporting and complaints processes, children need tools and support to help them stay safe online. This includes supportive information for children who might have been exposed to harmful content, and safety default settings for the largest search services. Children can expect to be given the choice to accept or decline invitations to group chats in which they could encounter harmful content.
- **Strong governance and accountability.** Keeping children safe starts with good governance. We are recommending that all services name a person accountable for children's safety. Other measures include an annual senior-body review of all risk management activities relating to children's safety and an employee Code of Conduct that sets standards for employees around protecting children.

Services can take alternative measures to protect children from those set out in the Codes. If they do, they must be prepared to demonstrate to us that the choices they have made meet the protection of children duties.

Services cannot decline to take steps to protect children because it is too expensive or inconvenient – protecting children is a priority. All services, even the smallest, will have to take action. In recommending measures, the Act requires us to ensure regulation is proportionate. We recognise that the size, capabilities, and risks of services differ widely and we have taken this into account in our impact assessments. We have recommended different measures for different types of services, with the most extensive expectations applying to the riskiest and largest services. Small services that pose a high risk to children are also expected to take a wide range of measures to address the risk of harm to children. The Codes balance the need to protect children with the benefits of being online. We have carefully considered the potential impact on children's and adults' rights, including their rights to freedom of expression, and privacy when determining what measures are appropriate and proportionate, as required by the Act.

## Next steps

---

Providers of services likely to be accessed by children must now complete children's risk assessments by 24 July 2025.

From 25 July 2025, as long as the Codes complete the Parliamentary process, providers will need to take the steps laid down in the Codes or use other effective measures to protect children. We will be expanding our digital toolkit for service providers to support them in completing children's risk assessments and complying with their children's safety duties.

In the coming months, we will publish proposals for additional measures to protect users, including children, from illegal harms and from content harmful to children. In our December 2024 Statement on Protecting People from Illegal Harms Online, we announced that our forthcoming consultation would include proposals for:

- banning the accounts of people found to have shared child sexual abuse material (CSAM);
- crisis response protocols for emergency events;
- use of hash matching to prevent the sharing of non-consensual intimate imagery and terrorist content; and
- tackling illegal harms including CSAM through the use of AI.

We can now confirm that these proposals will also include measures to protect children from grooming through the use of highly effective age assurance. We will also set out the evidence on livestreaming and the risks it can pose to children and make proposals to reduce these risks. After we have consulted on these measures, we will publish new versions of the Illegal Content Codes of Practice and Protection of Children Codes of Practice incorporating new measures that we decide to recommend.

By the end of 2025, we will publish our final guidance on wider protections for women and girls following our [consultation in February 2025](#).

We will continue our work to establish additional requirements focused on bringing an enhanced level of safety, transparency, and accountability to some of the most widely used user-to-user and search services (known as ‘categorised services’). Over the summer of 2025, we aim to publish the register of categorised services and then proceed to issue draft and final transparency notices to them.

This is only the first version of our framework to protect children, and we will continue to review and further develop our approach to bring about safer age-appropriate experiences online. We expect to update our regulation as new evidence arises on emerging risks to children and the measures that will best keep children safe online. We will scrutinise children’s risk assessments and maintain close engagement with services to continue to build our understanding of how they are meeting the children’s safety duties.

We will continue to build our evidence base, drawing on sources including our continued research with children and our report on the use and effectiveness of age assurance, which we will publish next summer. As our framework for protecting children develops, we will continue to have regard to the Government’s strategic priorities for the regime once they are finalised.

Alongside this statement, we are consulting on proposals that seek to expand the application of some of the User Support measures in the Illegal Content Codes to a wider range of services. This is because we now consider it would be proportionate for these measures to apply to certain smaller services that are likely to be accessed by children. We welcome stakeholder comments on these proposals by 22 July 2025.

## Navigation

---

This statement consists of six volumes:

- Volume 1 (this volume) sets out the scope of this statement, including an introduction to our duties and online safety functions and the children’s safety duties (Section 2), and our regulatory approach (Section 3).
- [Volume 2](#) is about the causes and impacts of harm to children. It sets out our approach and addresses stakeholder comments in relation to our Children’s Register of Risks, Children’s Risk Profiles, and Guidance on Content Harmful to Children. Our final [Children’s Register of Risks](#) and [Guidance on Content Harmful to Children](#) are published as separate documents.
- [Volume 3](#) is about governance and risk management. We explain why good governance and risk management is fundamentally important for online safety and set out our conclusions in relation to the [Children’s Risk Assessment Guidance](#), which is published as a separate document and incorporates our final Children’s Risk Profiles.

- [Volume 4](#) is about the measures we recommend services take to keep children safe online. These measures form our Protection of Children Codes of Practice, which are published as separate documents. There are two Codes of Practice – one for [user-to-user services](#) and one for [search services](#).
- [Volume 5](#) includes details of the assumptions used in our economic assessment, our legal framework, equality and Welsh language impact assessments, our summary of additional measures proposed by stakeholders, and our glossary.
- [Volume 6](#) sets out our proposals to expand the application of some of the User Support measures in the Illegal Content Codes to a wider range of services and provides details of how to respond.

## 2. Scope of this statement

In this section, we summarise Ofcom’s general duties and online safety functions and the children’s safety provisions in the Online Safety Act 2023 (the Act). We explain our role and duties in relation to human rights, equality legislation and the Welsh language.

Our equality impact assessment and Welsh language assessment are set out in Annex 5.

### Ofcom’s duties and online safety functions

---

#### General duties

- 2.1 Ofcom is the independent regulator for communications services. We have regulatory responsibilities for the telecommunications, postal, and broadcasting sectors, as well as for online services. These include user-to-user, search, and pornography services, as well as some online video services, such as on-demand programme services (ODPS) and video-sharing platforms (VSPs) established in the UK.<sup>1</sup>
- 2.2 As a public authority, Ofcom must act lawfully, rationally and fairly.
- 2.3 The Communications Act 2003 (the 2003 Act) places a number of duties on Ofcom that we must fulfil when exercising our regulatory functions, including our online safety functions. Section 3(1) of the 2003 Act states that our principal duty in carrying out our functions is:
- to further the interests of citizens in relation to communication matters; and
  - to further the interests of consumers in relevant markets, where appropriate by promoting competition.
- 2.4 In performing that principal duty, we must have regard to principles set out in the 2003 Act, which says that regulatory activities should be transparent, accountable, proportionate, consistent, and targeted only at cases in which action is needed.<sup>2</sup>
- 2.5 In carrying out our functions, we are required to secure, in particular, adequate protection of citizens from harm presented by content on regulated services, through providers using systems and processes designed to reduce the risk of harm.<sup>3</sup>
- 2.6 The 2003 Act further requires<sup>4</sup> that we must have regard to various factors as they appear to us to be relevant in the circumstances. In making our decisions, we have considered factors including, but not limited to:
- the risk of harm to citizens presented by content on regulated services;

---

<sup>1</sup> This section provides an overview of our duties and functions. Our legal framework is set out in Annex 4.

<sup>2</sup> We must also have regard to any other principles appearing to us to represent best regulatory practice. Section 3(3) of the 2003 Act.

<sup>3</sup> Section 3(2)(g) of the 2003 Act as amended by section 82 of the Online Safety Act 2023. For more detail on regulated services, see [Overview of regulated services](#)

<sup>4</sup> Section 3(4A) of the 2003 Act.



- the need for a higher level of protection for children than for adults;
- the need for it to be clear to providers of regulated services how they may comply with their duties under the Act;
- the need to exercise our functions so as 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;
- the desirability of promoting the use by providers of technologies which are designed to reduce the risk of harm to citizens; and
- the extent to which providers demonstrate, in a way that is transparent and accountable, that they are complying with their duties.

2.7 In line with our additional duties under the 2003 Act,<sup>5</sup> we have also considered the vulnerability of children and of others whose circumstances put them in need of special protection. We have considered:

- 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 those on low incomes;
- the desirability of preventing crime and disorder;
- the opinions of consumers and of members of the public generally;
- the interests of persons in the different parts of the United Kingdom; and
- the interests of the different ethnic communities within the United Kingdom.

## **Duties in relation to strategic priorities.**

2.8 Ofcom's duties in relation to statements of strategic priorities are set out in section 92 of the Online Safety Act 2023 (the Act). We must have regard to a designated statement of strategic priorities for online safety when carrying out our online safety functions, must explain in writing how we propose to do this within 40 days of the statement being designated (or such longer period the Secretary of State may allow), and must publish a review every year of what we have done.

2.9 On 20 November 2024 the UK Government published its draft Statement of Strategic Priorities (SSP) for online safety. In Section 3, we explain how the decisions set out in this statement will help to achieve the Government's strategic priorities for online safety.

## **Children's safety in the Online Safety Act 2023**

---

2.10 The Act provides for a new regulatory framework which has the general purpose of making the use of regulated internet services safer for individuals in the UK. Securing better

---

<sup>5</sup> Section 3(4) of the 2003 Act.

protections for children so that they are safer online is one of the core objectives of the Act.

- 2.11 The Act is clear that the duties imposed on providers of regulated services seek to secure (among other things) that regulated services are safe by design, and are designed and operated in a way that a higher standard of protection is provided for children than for adults.<sup>6</sup>
- 2.12 The Act places “duties of care” on providers of regulated user-to-user services likely to be accessed by children and on providers of regulated search services likely to be accessed by children in relation to, among other things, “content that is harmful to children”.<sup>7</sup>
- 2.13 The Act gives services a range of duties in relation to the protection of children, which we discuss later in this section. These duties, in essence, set out requirements for services likely to be accessed by children to assess and manage risks of harm arising from content that is harmful to children.
- 2.14 This section is intended to provide a high-level overview as context for this statement. As such, it does not contain a comprehensive account of what service providers must do to comply with the children’s safety duties in the Act (or the content of the relevant provisions in the Act). Further detail about what providers must do to comply with the children’s safety duties in the Act can be found across this statement and in Annex 4 (Legal Framework).

## Services likely to be accessed by children

- 2.15 The Act places a duty on all providers of regulated user-to-user and search services to carry out children’s access assessments.<sup>8</sup> Each provider will need to consider if its service(s) fall within the scope of the Act and carry out a children’s access assessment for each service that is subject to regulation. The purpose of the children’s access assessment is to determine whether a service, or a part of a service is to be treated as “likely to be accessed by children”.<sup>9</sup> Providers of services which are to be treated as “likely to be accessed by children” must then comply with the children’s risk assessment duties and the children’s safety duties.<sup>10</sup>
- 2.16 In order to determine whether a service is to be treated as “likely to be accessed by children”, the Act requires service providers to consider<sup>11</sup> first, whether it is possible for

---

<sup>6</sup> Section 1 of the Act. This is also reflected in the duties imposed on Ofcom under the 2003 Act, including the duty on Ofcom to have regard when performing our online safety functions to the need for a higher level of protection for children than for adults (s3(4A)(b)).

<sup>7</sup> Defined under section 60 of the Act.

<sup>8</sup> Section 36(1) of the Act.

<sup>9</sup> Sections 37(2) and (3) of the Act.

<sup>10</sup> Sections 7(4) and 24(4) of the Act. See also sections 20(4), 21(5), 31(4) and 32(5) which set out the reporting and complaints duties that apply to services likely to be accessed by children.

<sup>11</sup> Sections 35(1)(a) and (b) of the Act.

children to access the service<sup>12</sup> or a part of the service, and second, whether the “child user condition” is met in relation to a service or a part of it.<sup>13</sup>

- 2.17 Our Children’s Access Assessments Guidance provides further detail on how providers may comply with their duties in the Act regarding children’s access assessments.<sup>14</sup>

## The definition of content that is harmful to children

- 2.18 For the purposes of compliance with the children’s safety duties, “content that is harmful to children” is content that is legal but is nevertheless harmful to children. Content which is illegal is the subject of separate illegal content duties. We have published a statement on protecting people (including children) from illegal harms online in our December 2024 Statement on Protecting People from Illegal Harms Online (December 2024 Statement).<sup>15</sup>
- 2.19 The Act specifies that there are three kinds of “content that is harmful to children”:
- primary priority content that is harmful to children (PPC)
  - priority content that is harmful to children (PC)
  - non-designated content that is harmful to children (NDC).<sup>16</sup>
- 2.20 The Act sets out a list of the kinds of content that are to be regarded as PPC and PC. The specific kinds of content listed in the Act has been decided by Parliament and is not a matter over which we have any discretion. Section 219 of the Act gives the Secretary of State the power to amend the list by way of secondary legislation.<sup>17</sup>
- 2.21 Each of these kinds of content that is harmful to children is explained in further detail later in this section.
- 2.22 We are required to produce guidance for services which contains examples of content or kinds of content that we consider to be, or consider not to be, PPC and PC.<sup>18</sup> This guidance can be found in our Guidance on Content Harmful to Children.<sup>19</sup>
- 2.23 The Act specifies that a provider must make a judgement about whether content is “content that is harmful to children”, or one of the specific kinds of it, on the basis of all information that is reasonably available to it, taking into account the size and capacity of the provider and whether the judgement is made by human moderators, automated systems or processes, or a combination of the two.<sup>20</sup>

---

<sup>12</sup> Section 35(2) of the Act provides that a provider is only entitled to conclude that it is not possible for children to access a service, or a part of it, if age verification or age estimation is used on the service with the result that children are not normally able to access the service or that part of it.

<sup>13</sup> The “child user condition” will be met if (1) there is a significant number of children who are users of the service, or that part of it; or (2) the service, or that part of it, is of a kind likely to attract a significant number of users who are children. Section 35(3) of the Act.

<sup>14</sup> [Children’s access assessments](#)

<sup>15</sup> [Statement: Protecting people from illegal harms online](#)

<sup>16</sup> Sections 60(2) and 60(4) of the Act.

<sup>17</sup> The Secretary of State’s ability to add to the list is limited by the provisions in sections 219(2) to (4) of the Act.

<sup>18</sup> Section 53(1) of the Act.

<sup>19</sup> See Section 6 in Volume 2.

<sup>20</sup> Section 192 of the Act.

## Primary priority content that is harmful to children

2.24 The following kinds of content are PPC:<sup>21</sup>

- Pornographic content.<sup>22</sup>
- Content which encourages, promotes or provides instructions for:
  - > suicide;
  - > self-harm; or
  - > an eating disorder or behaviours associated with an eating disorder.

## Priority content that is harmful to children

2.25 The following kinds of content are PC:<sup>23</sup>

- content that is abusive on the basis of race,<sup>24</sup> religion,<sup>25</sup> sex, sexual orientation, disability<sup>26</sup> or gender reassignment;<sup>27</sup>
- content that incites hatred against people on the basis of race, religion, sex, sexual orientation, disability or gender reassignment;
- content that encourages, promotes or provides instructions for serious violence against a person;
- bullying content;<sup>28</sup>
- content which depicts serious violence against or graphically depicts serious injury to a person or animal (whether real or fictional);
- content that encourages, promotes or provides instructions for stunts and challenges that are highly likely to result in serious injury; and
- content that encourages the self-administration of harmful substances.

## Non-designated content that is harmful to children

2.26 Content that is not PPC or PC may be NDC if it is of a kind which presents a material risk of significant harm to an appreciable number of children in the UK, provided that the risk of harm does not flow from any of the following:

---

<sup>21</sup> Section 61 of the Act.

<sup>22</sup> Content which consists only of text or text accompanied by one of more of the following: identifying content consisting only of text, identifying content which is not pornographic, a GIF which is not pornographic, or an emoji or other symbol is not considered “pornographic content” for the purposes of the definition of PPC. See section 61(6) of the Act.

<sup>23</sup> Section 62 of the Act.

<sup>24</sup> The Act specifies that “race” includes colour, nationality, and ethnic or national origins. See section 62(10)(b).

<sup>25</sup> The Act specifies that references to religion include references to a lack of religion. See section 62(10)(c).

<sup>26</sup> The Act defines “disability” as any physical or mental impairment. See section 62(10)(a).

<sup>27</sup> The Act specifies that a person has the characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex. See section 62(11).

<sup>28</sup> The Act specifies that “bullying content” includes, but is not limited to, content targeted against a person which conveys a serious threat, is humiliating or degrading; forms part of a campaign of mistreatment. See section 62(12).

- the content’s potential financial impact;
- the safety or quality of goods featured in the content; or
- the way in which a service featured in the content may be performed (for example, in the case of the performance of a service by a person not qualified to perform it).<sup>29</sup>

## Children’s risk assessments

- 2.27 Providers of services likely to be accessed by children are required to complete a suitable and sufficient children’s risk assessment to assess the risk to children from content that is harmful to children on their service, taking into account any measures that they already have in place to protect children.<sup>30</sup>
- 2.28 A children’s risk assessment must:
- separately assess the risk of children encountering each kind of harmful content as set out in paragraph 2.19;
  - take into account Ofcom’s Children’s Risk Profiles which set out relevant risk factors for online services;
  - assess the level of risk of harm to children and how that is affected by characteristics of a service and how it is used, including: user base, functionalities, algorithmic systems, and the business model;
  - assess any other relevant aspects of the design and operation of a service, including governance, use of proactive technology, measures to promote users’ media literacy, and other systems and processes; and
  - give separate consideration to children in different age groups.
- 2.29 Service providers must keep a record of each children’s risk assessment.<sup>31</sup> In addition, providers of Category 1 services must publish a summary of their risk assessments in their terms of service and providers of Category 2A services must also publish a summary of their risk assessments in a publicly available statement.<sup>32</sup> Providers of both Category 1 and Category 2A services must provide Ofcom with copies of their risk assessments as soon as is reasonably practicable.<sup>33</sup> Where providers of user-to-user services identify the presence of NDC that is harmful to children, they are required to notify Ofcom of the kinds of content identified and the incidence of it.<sup>34</sup>

## The safety duties protecting children

- 2.30 The Act imposes a number of safety duties requiring providers of services likely to be accessed by children to manage and mitigate risks of harm from content that is harmful to children.

---

<sup>29</sup> Sections 60(2)(c), 60(3), and 60(4) of the Act.

<sup>30</sup> Sections 11(2) (user-to-user services) and 28(2) (search services) of the Act.

<sup>31</sup> Sections 23(2) (user-to-user services) and 34(2) (search services) of the Act.

<sup>32</sup> Sections 12(14) (user-to-user services) and 29(9) (search services) of the Act.

<sup>33</sup> Sections 23(10) (user-to-user services) and 34(9) (search services) of the Act.

<sup>34</sup> Section 11(5) of the Act.

2.31 A service provider's duties will differ depending on whether it provides a user-to-user service or a search service. The duties are summarised in **Table 2.1**.

**Table 2.1: The safety duties protecting children**

Duty	Regulated services likely to be accessed by children	
	User-to-user	Search
	Take or use proportionate measures relating to the design or operation of the service to:	
<b>Manage risks identified in risk assessment</b>	Effectively mitigate and manage the risks of harm to children in different age groups, as identified in the most recent children's risk assessment. <sup>35</sup>	
<b>Mitigate the impact of harm</b>	Mitigate the impact of harm to children in different age groups presented by content that is harmful to children. <sup>36</sup>	
	Operate the service using proportionate systems and processes designed to:	
<b>PPC</b>	Prevent children of any age from encountering PPC <sup>37</sup>  This requires the use of highly effective age assurance unless the terms of service prohibit the relevant form of PPC on the service for all users. <sup>38</sup>	Minimise the risk of children encountering search content that is PPC. <sup>39</sup>
<b>PC</b>	Protect children in age groups judged (in the risk assessment) to be at risk of harm from encountering PC. <sup>40</sup>	Minimise the risk of children in age groups judged (in the risk assessment) to be at risk of harm encountering search content that is PC. <sup>41</sup>

<sup>35</sup> Sections 12(2)(a) (user-to-user services) and 29(2)(a) (search services) of the Act.

<sup>36</sup> Sections 12(2)(b) (user-to-user services) and 29(2)(b) (search services) of the Act.

<sup>37</sup> Section 12(3)(a) of the Act.

<sup>38</sup> Sections 12(4), (5) and (6) of the Act.

<sup>39</sup> Section 29(3)(a) of the Act.

<sup>40</sup> Section 12(3)(b) of the Act.

<sup>41</sup> Section 29(3)(b) of the Act.

	Regulated services likely to be accessed by children	
<b>NDC</b>	Protect children in age groups judged to be at risk of harm (in the risk assessment) from encountering NDC (as identified in the risk assessment). <sup>42</sup>	Minimise the risk of children in age groups judged (in the risk assessment) to be at risk of harm encountering search content that is NDC (as identified in the risk assessment). <sup>43</sup>
	Clear and accessible terms of service: <sup>44</sup>	Clear and accessible publicly available statement: <sup>45</sup>
<b>Terms of service or publicly available statement</b>	<p>Specifying how children are to be prevented from encountering PPC and protected from encountering PC and NDC.<sup>46</sup></p> <p>The relevant provisions of the terms of service must be applied consistently.<sup>47</sup></p>	<p>Specifying how children are to be protected from PPC, PC and NDC.<sup>48</sup></p> <p>The relevant provisions of the publicly available statement must be applied consistently.<sup>49</sup></p>
<b>Terms of service or publicly available statement</b>	<p>Explaining the operation of any measure used to prevent children under a certain age accessing all or part of the service.<sup>50</sup></p> <p>The relevant provisions of the terms of service must be applied consistently.<sup>51</sup></p>	N/A
<b>Terms of service or publicly available statement</b>	Giving information about any proactive technology used. <sup>52</sup>	

<sup>42</sup> Section 12(3)(b) of the Act.

<sup>43</sup> Section 29(3)(b) of the Act.

<sup>44</sup> Section 12(13) of the Act.

<sup>45</sup> Section 29(8) of the Act.

<sup>46</sup> Section 12(9) of the Act.

<sup>47</sup> Section 12(10) of the Act.

<sup>48</sup> Section 29(5) of the Act.

<sup>49</sup> Section 29(6) of the Act.

<sup>50</sup> Section 12(11)(a) of the Act.

<sup>51</sup> Section 12(11)(b) of the Act.

<sup>52</sup> Section 12(12) (user-to-user) and section 29(7) (search) of the Act.

- 2.32 The Act contains a number of cross-cutting duties, such as those for content reporting<sup>53</sup> and complaints procedures.<sup>54</sup> In this statement, we refer to the safety duties protecting children, to include the reporting and complaints duties for services likely to be accessed by children, as the “children’s safety duties”.
- 2.33 In addition, there are further cross cutting duties that apply to providers of user-to-user and search services which are those concerning the rights to freedom of expression and privacy,<sup>55</sup> along with duties about record-keeping and review.<sup>56</sup> The duties concerning freedom of expression and privacy mean that service providers must have particular regard to the importance of these rights when putting safety measures and policies in place.
- 2.34 Providers must also keep written records of risk assessments and measures that are used whether they are set out in a code of practice or if the provider decides to use an alternative measure to comply with their duties.<sup>57</sup>

## Human rights

---

- 2.35 It is unlawful for Ofcom to act in a way which is incompatible with the European Convention of Human Rights (ECHR).<sup>58</sup>
- 2.36 Of particular relevance to our functions under the Act are the right to freedom of expression (Article 10 ECHR) and the right to privacy (Article 8 ECHR). Other ECHR rights which may also be relevant to our functions under the Act are the right peaceful enjoyment of one’s possessions (Article 1 of Protocol No. 1 ECHR), the right to freedom of thought, conscience and religion (Article 9 ECHR) and the right to freedom of assembly and association (Article 11 ECHR). In formulating our decisions in this statement, we have carefully analysed where we have identified the potential for interference with ECHR rights, to make sure any such interference is proportionate.
- 2.37 The right to freedom of expression includes the freedom to hold opinions and to receive and impart information and ideas without interference by public authority. Article 10(2) of the ECHR states that this right may be restricted in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.
- 2.38 Article 8(1) of the ECHR states that everyone has the right to respect for his private and family life, his home, and his correspondence. Article 8(2) sets out limited qualifications, stating that public authorities must not interfere with the exercise of this right unless necessary in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

---

<sup>53</sup> Section 20 (user-to-user) and section 31 (search) of the Act.

<sup>54</sup> Section 21 (user-to-user) and section 32 (search) of the Act.

<sup>55</sup> Section 22 (user-to-user) and section 33 (search) of the Act.

<sup>56</sup> Section 23 (user-to-user) and section 34 (search) of the Act.

<sup>57</sup> See the [Record-Keeping and Review Guidance](#).

<sup>58</sup> Section 6 of the Human Rights Act 1998.



- 2.39 These are qualified rights, and the need for any interference with these rights must be construed strictly and established convincingly. Any interference must be prescribed by or in accordance with the law, pursue a legitimate aim,<sup>59</sup> and be necessary in a democratic society – in other words, it must be proportionate to the legitimate aim pursued and corresponding to a pressing social need.
- 2.40 In arriving at the decisions made in this statement, where we have identified the potential for interference with ECHR rights, we have carried out a careful analysis of the relevant criteria under which such an interference may be justified as proportionate. In considering whether impacts on ECHR rights are proportionate, our starting point is to recognise that Parliament has determined that providers of regulated services must take proportionate measures to fulfil their duties to protect children from content that is harmful to them. Such measures will necessarily have an impact on the experiences of children and adults who are using these services, in particular by significantly limiting children’s exposure to such content (and in some cases, seeking to prevent such exposure altogether). The measures may also introduce some friction for adult users<sup>60</sup> in how they access and use regulated services or content that is harmful to children on those services. This could have an impact their rights to freedom of expression, and in some cases, their rights to freedom of religion or belief and freedom of association. This will also have an impact on service providers’ rights to freedom of expression, in particular as to how they impart information. They will also, to some extent, have impacts on children’s and adults’ rights to privacy, as far as they would require their personal data to be processed for the measures to work properly. To the extent that such interferences can be seen as a direct result of the duties imposed on services and on Ofcom by Parliament and are required to achieve the legitimate objective of securing adequate protections for children from harm, we consider that a substantial public interest exists in these outcomes.
- 2.41 For service providers, the right to peaceful enjoyment of their possessions is also relevant (Article 1 of the First Protocol to the ECHR: “No one shall be deprived possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law”). However, this in no way impairs the right of the UK to enforce such laws as it deems necessary to control the use of property in accordance with the general interest. We consider the Act to be such a law, and we consider our impact assessment as a whole to demonstrate that the measures are proportionate. See Section 10 (Developing the Protection of Children Codes: Our framework) for more detail on the approach we have taken to impact assessments.
- 2.42 However, in line with our obligations under the Human Rights Act, we also seek to secure that any such interference with adults’ and children’s rights to freedom of expression and privacy, or other relevant rights, is proportionate to the legitimate objectives pursued.

---

<sup>59</sup> As set out in Articles 8(2), 9(2), 10(2) and 11(2). The relevant legitimate aims that Ofcom acts in pursuit of in the context of our functions under the Act includes the prevention of crime and disorder, public safety and the protection of health or morals, and the protection of the rights and freedoms of others.

<sup>60</sup> Users also include those who are operating on behalf of a business, or accounts that might also be concerned with other entities, such as charities, as well as those with their own, individual account. Both corporate and individual users can benefit from the right to freedom of expression, and we acknowledge the potential risk of interference with the rights of these users to freedom of expression, in addition to the rights of children and adults as individuals. For ease of reference, when we refer to rights of users, we include those who are acting on behalf of a business or other entity.

Where appropriate, we explain why the relevant restriction is justified. We have sought to build in appropriate safeguards to protect those rights in our measures where appropriate. In doing so, among other things, we have considered whether other, less intrusive measures are available that might adequately mitigate the harms faced by children on regulated services.<sup>61</sup>

- 2.43 Overall, we have sought to strike a fair balance between securing adequate protections for children from harm (and their rights in respect of this) and the ECHR rights of users (both children and adults), other interested persons (including for example, persons who host websites and who may be featured in content on regulated services or whose content might be on those services regardless of whether or not they may be service users) and service providers, as relevant. In other words, we aim to ensure that the degree of interference with ECHR rights is outweighed by the benefits secured in terms of protecting children from harm. In seeking to achieve this fair balance, we consider that the Act and the protection it gives to individuals against harms of various kinds (in particular the duties aimed at protecting children from harm, which are the key focus of this statement, as well as the duties which apply to illegal content and activity) reflect the decision of the UK Parliament that UK users, and UK child users in particular, should be proportionately protected from all the harms concerned. In doing so, Parliament has enshrined in UK law the rights of UK users – including their human rights – to be protected from those harms. In weighing up whether the measures we are recommending are proportionate, we start from the position that UK users should be protected from the harms set out in the Act and place weight on all the specific evidence of harm set out in our statement.
- 2.44 We address the relevant rights impacts on users, service providers and other persons in each of the sections of the statement in relation to each of the measures recommended in our Protection of Children Codes of Practice, and in the sections on our decisions on our Children’s Register of Risks, Children’s Risk Assessment Guidance, and Guidance on Content that is Harmful to Children.

## Children’s rights

- 2.45 We note that the UK has ratified the United Nations Convention on the Rights of the Child (UNCRC)<sup>62</sup> and the UK Government is required to make law that gives effect to it. Among other things, the UNCRC requires that the best interests of the child should be a primary consideration in all actions concerning children, including those taken by public authorities such as Ofcom.<sup>63</sup> As we noted in our May 2024 Consultation on Protecting Children from Harms Online (May 2024 Consultation), of particular relevance in this context is General

---

<sup>61</sup> This reflects the third limb of what is often referred to as the ‘*Bank Mellat* test’, as set out by Lord Reed JSC in *Bank Mellat v HM Treasury (No 2)* [2013] UKSC 39; [2014] AC 700.

<sup>62</sup> [United Nation Convention on the Rights of the Child, adopted 20 November 1989 by General Assembly resolution 44/25.](#)

<sup>63</sup> See Article 3 of the UNCRC. Other important rights under the UNCRC include the right to non-discrimination (Article 2), the right to life, survival and development (Article 6), the right to be heard and participate (Article 12), the right to freedom of expression and access to information (Articles 13 and 17), the right to freedom of thought, conscience and religion (Article 14), the right to freedom of association (Article 15), the right to privacy (Article 16). We note that these rights are also reflected in the rights enshrined in the ECHR as discussed above.

Comment No. 25 (2021) on children's rights in relation to the digital environment,<sup>64</sup> which explains that State parties should ensure that (1) in all actions relating to the regulation, design, management and use of the digital environment, the best interests of the child is a primary consideration, and that (2) in considering best interests, regard should be had to all children's rights. General Comment No. 25 also highlights the need to respect the evolving capacities of the child, and the risks and opportunities of their engagement in the digital environment depending on their age and stage of development.

- 2.46 The Northern Ireland Commissioner for Children and Young People (NICCY) and the Children and Young People's Commissioner for Scotland called for us to conduct a children's rights impact assessment, with NICCY suggesting we consider the modular toolkit for carrying out children's rights impact assessments currently being developed by UNICEF.<sup>65</sup>
- 2.47 We have considered stakeholders' calls for greater focus on children's rights. As set out at consultation, our view remains that the UK Parliament made it clear during the legislative process that the spirit of the UNCRC is reflected in the Act, including by amending the 2003 Act to reference the higher standard of protection for children.<sup>66</sup> On that basis, we remain of the view that the appropriate approach for us to assess rights impacts is to consider these in light of the applicable requirements under UK law, which encompasses and reflects relevant aspects of the UNCRC and General Comment No.25 (2021).
- 2.48 In response to stakeholder comments about children's rights impact assessments, we have specifically considered negative and positive impacts on children's rights across this statement. We have considered how to balance protecting children from harm with children's rights to freedom of expression, freedom of association, privacy and religion or belief, among others. Where we have identified a possible negative impact on children's rights, we have considered this in the context of the individual measures and explained how this has been mitigated. In designing our approach, we have had specific regard to children's views and experiences, as we discuss in Section 9 in the sub-section 'What children told us'. We have also had regard to children's evolving capacities in deciding on our measures, in particular in the changes we have made to reflect children in different age groups, as we discuss in Section 9 in the sub-section 'Approach to age groups'.
- 2.49 The rights of adults and service providers are also protected under international and UK human rights law. We have further considered the impact of our decisions on such rights to ensure that our measures do not unduly interfere with them. However, we have given particular weight to the best interests of children in our approach.

## Equality legislation and Welsh language

---

- 2.50 We have considered the equality impacts of the Codes and guidance set out in this statement and have detailed our understanding of any particular impacts on protected groups in the UK.

---

<sup>64</sup> [General comment No. 25 of the UN Committee on the Rights of the Child](#), published 2 March 2021

<sup>65</sup> NICCY response to May 2024 Consultation, p.21.

<sup>66</sup> Section 3(4A)(b) of the 2003 Act, as amended by section 91 of the Act.

- 2.51 Where relevant, and to the extent we have discretion to do so in the exercise of our functions, we have considered the potential impacts on opportunities to use the Welsh language and the need to treat the Welsh language no less favourably than English (in accordance with Welsh language standards).
- 2.52 We have set out our considerations on these matters in Annex 5.

# 3. Our approach to protecting children online

In this section, we explain our approach to protecting children online, including how our work is aligned with the Government’s draft Statement of Strategic Priorities for online safety.<sup>67</sup>

We set out how we have developed our approach, and our position on a number of cross-cutting policy issues.

We also summarise and respond to stakeholder feedback regarding our approach to the May 2024 Consultation on Protecting Children from Harms Online (May 2024 Consultation) process, including working with stakeholders; engagement with children, parents and caregivers; and international alignment.

## Introduction

- 3.1 Securing a higher level of protection online for children than for adults is one of the objectives of the Online Safety Act 2023 (the Act).<sup>68</sup> The Protection of Children Codes of Practice (the Codes) and guidance that we discuss in this statement will create a safer life online for children in the UK. They build on those covered in our December 2024 Statement on Protecting People from Illegal Harms Online (December 2024 Statement),<sup>69</sup> which will protect children from illegal content and activity, including child sexual exploitation and abuse (CSEA). The Codes implement our decisions in relation to our approach to highly effective age assurance for Part 3 services, as set out in our January 2025 Statement and accompanying guidance.<sup>70</sup>
- 3.2 Services will have already completed their children’s access assessments to determine whether they are likely to be accessed by children; these were due to be completed by 16 April 2025. Services likely to be accessed by children must now take steps to comply with the children’s safety duties, in line with the guidance, Codes and other resources that we discuss in this statement.
- 3.3 As we explain in Volume 2, harmful content is widespread online, and its impacts on children can be serious. Some demographic factors can heighten the risks of exposure to some forms of harmful content, and older and younger children are affected in different ways.<sup>71</sup> The Children’s Register of Risks (Children’s Register) sets out the risks of content harmful to children, acting as a central resource for providers of user-to-user and search services likely to be accessed by children, and forming the basis of the Children’s Risk Profiles, which service providers must take account of when conducting children’s risk assessments. Our updated Children’s Register is based on around 550 individual sources of

---

<sup>67</sup> [Draft Statement of Strategic Priorities for online safety - GOV.UK](#)

<sup>68</sup> Section 1(3)(b)(i) of the Act and section 3(4A)(b) of the Communications Act 2003.

<sup>69</sup> [Statement on Protecting people from Illegal Harms Online](#) published in December 2024.

<sup>70</sup> [Age Assurance and Children’s Access Statement](#) published in January 2025 and [Part 3 HEAA Guidance](#)

evidence, including new sources suggested by stakeholders in their responses to the May 2024 Consultation on Protecting Children from Harms Online (May 2024 Consultation). We have now identified two kinds of content that meet the definition of NDC (non-designated content) in the Act, because of the harm that may arise when this content is encountered in high volumes. These are ‘content that promotes depression, hopelessness and despair’ (depression content) and ‘content that shames or otherwise stigmatises body types or physical features’ (body stigma content).

- 3.4 Alongside the Children’s Register, our Guidance on Content Harmful to Children (discussed in Volume 2) is intended to support providers of Part 3 services likely to be accessed by children in making judgements about content that is harmful to children as defined in the Act. We have included in the final guidance a number of additional examples suggested by stakeholders in response to the May 2024 Consultation.
- 3.5 The Children’s Risk Assessment Guidance is intended to assist services in fulfilling their legal obligations. It sets out a four step risk assessment methodology for service providers to understand the kinds of content harmful to children they need to consider: assess the risk of harm to children; decide what measures to implement to mitigate those risks; and implement, record and update the outcome of the assessment, which Ofcom may then request.
- 3.6 Since the May 2024 Consultation, we have made a number of clarificatory changes to the Children’s Risk Assessment Guidance. We have provided additional guidance on assessing the risk of harm presented to children by NDC and clarified the use of evidence to understand child age. We have also included examples of how to use the risk level tables to help make accurate judgments when assessing service risks. We have also updated the Children’s Risk Profiles to include other key kinds of content harmful to children, based on new evidence provided by stakeholders, which highlights links between specific risk factors and kinds of content harmful to children. The Children’s Risk Profiles incorporate our evaluation of the two kinds of content that we have identified as NDC.
- 3.7 The Codes set out the steps that service providers should take to keep children safe online. The safety measures that we recommend will depend on the type and level of the risks to children that service providers have identified in their latest children’s risk assessment, as well as the size of the service and, in some cases, what features and functionalities it offers. Providers may take alternative measures to comply with their duties, as long as they achieve at least the same level of protection for children. If service providers choose to take alternative measures, they must keep a record of what they have done.
- 3.8 As we discuss in Volume 4, this first iteration of the Codes is a big step forward in creating a safer life online for children in the UK. Crucially, the measures will mean that providers of user-to-user services that allow harmful content must establish which of their users are children in order to ensure they can benefit from the protections set out in other measures in the Codes. This represents a fundamental change to existing practice. Once providers know which of their users are children, they should implement measures to provide a safer online experience for those children. The Codes also include measures designed to strengthen protections for children using search services.
- 3.9 Our first Codes package will significantly improve children’s online safety and is the first step towards safer online experiences. We will scrutinise a number of service providers’

children's risk assessments (including the largest social media services as well as smaller by risky services) and maintain close engagement with them to build our understanding of how they are meeting the children's safety duties.

3.10 Over time, we expect to consider and consult on adding future measures to the Codes that will continue to build safer experiences online for children in the UK, including where new evidence arises on emerging risks to children and potential future measures to help keep them safe online. In the coming months, we will publish proposals for additional measures to protect users, including children, from illegal harms and from content harmful to children. In our December 2024 Statement, we announced that our forthcoming consultation would include proposals for:

- banning the accounts of people found to have shared child sexual abuse material (CSAM);
- crisis response protocols for emergency events;
- use of hash matching to prevent the sharing of non-consensual intimate imagery and terrorist content; and
- tackling illegal harms including CSAM through the use of artificial intelligence (AI).

3.11 These proposals will also include measures to protect children from grooming through the use of highly effective age assurance. We will also set out the evidence surrounding livestreaming and the risks it can pose to children and make proposals to reduce these risks.

## The UK Government's strategic priorities for online safety

---

3.12 On 20 November 2024 the UK Government published its draft Statement of Strategic Priorities (SSP) for online safety.<sup>72</sup> The draft SSP identifies five strategic priorities for online safety:

- implementing safety by design to stop more harm occurring in the first place;
- increasing transparency and accountability of online services;
- maintaining regulatory agility to keep pace with changing technology and behaviour;
- building an inclusive and resilient online society of well-informed users; and
- supporting continued innovation in safety technologies.

3.13 We have considered these priorities and are of the view that the decisions in this statement will help to achieve the priorities in the following ways:

- **Safety by design:** As we discuss in Section 9, many features of the online safety regulations and the overall package of measures promote safety by design. The Governance and Accountability and Recommender Systems measures, in particular, aim to embed children's safety into services' design and decision-making processes. We will continue to build our evidence base on whether additional future measures could

---

<sup>72</sup> [Draft Statement of Strategic Priorities for online safety - GOV.UK](#)

strengthen the Codes, focusing on safety by design measures to address the risks of features and functionalities that amplify harmful content, particularly for younger users.

- **Governance and accountability:** As we discuss in Sections 7, 8 and 11, the Children's Risk Assessment Guidance and the Governance and Accountability measures in the Codes act together to enable a culture of timely and safety-focused risk management in organisations, which will act as a foundation to drive safer experiences online for children.
- **Well-informed users:** The User Support measures, which we discuss in Section 18, provide children with tools to give them more control over their online experiences and supportive information to help them make safer choices. They are designed to give children the ability and understanding to navigate online services safely. The measures should also provide educators, parents, caregivers and others in wider society with a role to play in protecting children online, with an understanding of the steps they can take to keep children safe online.
- **Innovation:** In our January 2025 Statement, we confirmed our criteria-based, tech-neutral and future-proof approach to highly effective age assurance, as reflected in our Part 3 HEAA Guidance. The safety measures in the Codes build on the foundation provided by our January 2025 Statement. They provide flexibility for the broad range of regulated services to implement an age assurance process that best suits their business, while creating opportunities for innovation in age assurance, which represents an important part of a wider safety tech sector where the UK is a global leader.<sup>73</sup>

3.14 In relation to regulatory certainty, we will continue to review and iterate our approach to drive safer age-appropriate experiences online. While we expect to update our regulation over time, our immediate priority will be engaging with services to understand what approaches they are taking to comply with the protection of children duties.

## Developing our approach to protecting children from harm online

---

3.15 Our January 2023 Protection of Children Call for Evidence (2023 CFE) focused on the protection of children and our work to implement the children's safety provisions in the Act.<sup>74</sup> Stakeholder feedback on the 2023 CFE from stakeholders helped us to formulate the proposals we consulted on in our May 2024 Consultation.

3.16 Following the publication of the May 2024 Consultation, we sought the views and perspectives of stakeholders, including industry, academics, expert bodies, and children's safety campaigners. We also carried out a programme of deliberative engagement with children to gather their views on age-appropriate descriptions of draft Codes.<sup>75</sup>

---

<sup>73</sup> [Research from the UK Government](#) indicates that UK firms account for an estimated one in four (23%) of the global safety tech workforce. Just over 28% of safety tech companies are based in the UK according to recent [research by Paladin Capital Group, PUBLIC and Perspective Economics](#)

<sup>74</sup> [Call for evidence: Second phase of online safety regulation - Ofcom](#)

<sup>75</sup> [Consulting children on Protection of children online safety proposals](#)



- 3.17 As part of our engagement with stakeholders, we held online sessions, workshops and round tables where stakeholders shared their feedback on our consultation proposals. The discussions and feedback we received from stakeholders during this engagement was valuable in helping clarify a number of written responses to the consultation that were shared.
- 3.18 We received 132 written responses to the [May 2024 Consultation](#) from a broad range of stakeholders including providers of regulated services, civil society organisations, public bodies and individuals.
- 3.19 The consideration of feedback received in response to the May 2024 Consultation and additional evidence from further engagement with stakeholders have helped to develop our policy and final decisions reached at statement.
- 3.20 Due to the interconnected nature of the November 2023 Consultation on Protecting People from Illegal Harms Online (November 2023 Consultation) and the May 2024 Consultation, we have also considered the responses we received to the November 2023 Consultation to the extent that they were also relevant for our proposals in the May 2024 Consultation. This included where stakeholders requested that we consider links between our illegal harms and protection of children work. All the non-confidential responses we received have been published and can be found on our website.<sup>76</sup>
- 3.21 While we have not responded to all stakeholder responses in this statement, we have considered them even where we have not referred to or quoted them in this statement.

## Consulting and engaging with children

---

- 3.22 Alongside the responses we received to our May 2024 Consultation, we sought feedback from children. We commissioned a programme of deliberative engagement with children to gather their views on age-appropriate descriptions of draft Codes, in activities including workshops and interviews. The work was carried out in summer 2024 and 112 children across the UK aged 8-17 took part. These discussions were an important component of our work as they enabled children to provide their views on proposed measures that will ensure a safer experience for them online.
- 3.23 Overall, we found that children broadly supported our proposed approach to the draft Codes. Most children were positive about Ofcom's role in online safety and expressed support for the proposed measures. They appreciated that legislation had been introduced to protect children from harmful content and were reassured that an organisation had been appointed to oversee this. Some children, including several who cited their own experiences of encountering harmful content, stated that the measures felt overdue.
- 3.24 While there was support for our proposals, many children were sceptical about how effective some were likely to be in practice. They felt there was a risk that interventions could be circumvented and were concerned about whether services could always be able to identify harmful content and deal with it.
- 3.25 There was a desire for the measures to be applied consistently to ensure that children were not left out of social environments to which their peers had access. Children provided us

---

<sup>76</sup> [Consultation: Protecting children from harms online - Ofcom](#)

with a range of views which can be found in the full report.<sup>77</sup> This feedback has helped inform our policy development and decisions across this statement, together with our ongoing programme of research with children. In some areas of the Codes, for example, we have made changes in response to children's feedback on our proposals (which we considered alongside other relevant information). These include our decisions on Recommender Systems and User Support measures, which we discuss in detail in Volume 4.

3.26 Children's voices and experiences will continue to play a crucial role in our policy work. We are expanding our programmatic children's research and engagement work in the following ways:

- **The Children's Online Safety Tracker**, which will survey around 7,000 children aged between 8-17 twice a year about their exposure to harmful content and experiences of online safety tools, particularly those that feature in the Codes. This research will help us to monitor and understand the impact of the Codes over time and importantly among children in different age groups. We will continue to invest in this tool and intend to expand the age range to include children aged 6-7.
- **Piloting new research to hear about children's lived experiences online:** We are piloting an online longitudinal study in which a group of children aged 8-17 will complete monthly diaries telling us about their online experiences and take part in a one-to-one interview with our research partner every quarter. These children have varied interests and use a range of services. This should provide Ofcom timely and direct insights from children into their lived experiences online on an ongoing basis, including alerting us to any potential emerging risks or harms.
- **Exploring additional opportunities to engage directly with children and young people.** We are continuing to work with stakeholders such as the Children's Commissioners across the UK nations to explore ongoing opportunities to hear children's views about online safety.
- **Measuring children's online activities via passive monitoring data collection.** Following a previous pilot study, we have recently completed a scaled-up version of the study measuring the internet use of UK children aged 8-14 via a passive monitoring tracker. The findings will assist in our obligations to our online safety duties and promote media literacy. The results will be published later in 2025.
- **Avatar research:** we are building our internal capability to conduct this type of research. Avatar research involves setting up fictional profiles on online services to observe the content and contact avatar accounts encounter with the aim of better understanding services and users' experiences on them.

3.27 We recently initiated a new Children's Online Research Stakeholder Network which brings together UK regulators and Government bodies with an interest in children's online experiences. The Network provides a forum for sharing research plans and insights. It will help build a collective understanding of children's experiences, attitudes and behaviour with a view to enabling increased understanding and faster progress.

---

<sup>77</sup> Ofcom, 2025. [Consulting children on Protection of Children Online Safety proposals](#)

- 3.28 As part of our [Online Safety Research Agenda](#), we work with academic experts to broaden our evidence base. We are prioritising engagement with researchers working on projects related to the protection of children. As a result, we have supported 19 academic research projects focused on a range of related topics, from media literacy to digital exclusion and mental health.

## Stakeholder feedback on our approach to protecting children

---

### Accessibility of May 2024 Consultation

#### Summary of responses

- 3.29 A number of stakeholders expressed concern about the challenge of responding to such a large and complex consultation, particularly for civil society organisations.<sup>78</sup>

#### Our response

- 3.30 Our consultations are necessarily detailed due to our legal obligation to consult and provide sufficient detail for stakeholders to consider in order to respond. In accordance with our duties under section 41 of the Act, we are required to consult with certain stakeholders prior to preparing drafts of, or any amendments to the Codes.<sup>79</sup> We are also required under section 7 of the Communications Act 2003 (2003 Act) to carry out and consult on our assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities.<sup>80</sup> We recognise that not all stakeholders are able to respond to every aspect of a consultation, particularly smaller companies, civil society organisations, and individuals.
- 3.31 To help stakeholders, particularly those with a focused interest who were unable to provide feedback on each of our proposals, we published an accessible summary of our May 2024 Consultation.<sup>81</sup> This outlined all our proposals and referred stakeholders to corresponding sections for detailed information on each proposal. The summary was accompanied by our Proposed Codes at a glance document, which provided a high-level overview of all the measures we were consulting on.<sup>82</sup> We have updated both these documents to reflect the changes we have made since consultation and our final decisions.<sup>83</sup> We also published quick guides which provided an overview of our consultation proposals, who they would apply to, and what they would mean for service providers.<sup>84</sup>

---

<sup>78</sup> [3<]; Children and Young People's Commissioner Scotland response to May 2024 Consultation, p.1; [3<]; Samaritans response to May 2024 Consultation, p.1;[3<].

<sup>79</sup> See section 41(6) of the Act.

<sup>80</sup> See section 7 of the Act. This extends to Ofcom's online safety functions – see section 7(4A) and (4B) of the Act.

<sup>81</sup> [Summary-of-consultation.pdf](#)

<sup>82</sup> [Proposed codes at a glance](#)

<sup>83</sup> [Summary of our decisions](#); [Codes at a glance](#).

<sup>84</sup> [Quick guide to children's access assessments](#); [Quick guide to children's risk assessments: protecting children online](#); [Quick guide to Children's Safety Codes](#).

- 3.32 In addition to receiving written responses from stakeholders, we also used a variety of approaches to ensure that different stakeholder perspectives were captured. For example, we held online sessions with stakeholders and roundtables including with expert stakeholders to further inform our proposed categories of NDC. We have considered comments made in those sessions and reflected them in our decisions where appropriate. These stakeholder sessions are frequently referenced in our discussion of the refined categories of NDC (body stigma content and depression content) in Section 10 and 11 of the Children’s Register of Risks.

## Working with stakeholders

### Summary of responses

- 3.33 A number of respondents stressed the importance of involving stakeholders, including industry, independent experts and civil society, in the development of online safety regulation.<sup>85</sup> Brave Movement and Samaritans said it was important to involve people with lived experience of harm in the development of our regulation.<sup>86</sup>

### Our response

- 3.34 We agree that it is important for us to engage with a wide range of stakeholders from industry, civil society and academic and we have done this throughout the development of our policy, from our 2023 CFE and our May 2024 Consultation through to our decisions. Capturing different perspectives to inform our decisions is crucial for developing robust regulation.
- 3.35 Input from civil society organisations has been fundamental not only to developing the measures we cover in this statement, but also across the remainder of our online safety programme of work. We will continue to work with civil society stakeholders as we develop regulation – for example in relation to our draft guidance on online safety for women and girls<sup>87</sup> – and as and when we develop additional future measures to protect children.
- 3.36 We will continue to engage with people who have lived experience of online harms both through direct engagement and our research programme. To ensure our work is shaped and informed by those with lived experience and that our engagement does not negatively impact the people we talk to as part of our evidence and insight-gathering, we are working closely with an organisation that specialises in safeguarded, trauma-informed engagement to put in place a focused strategy. Through this, we will embed the lessons we learn into our evolving protection of children work and develop the required internal capability.
- 3.37 Capturing different perspectives is crucial for developing robust regulation. This involves having regard to the impact of our policies on groups whose vulnerabilities and circumstances appear to put them in need of special protection. Equality Impact

---

<sup>85</sup> Commissioner Designate for Victims of Crime Northern Ireland response to May 2024 Consultation, p.6; National Society for the Prevention of Cruelty to Children (NSPCC) response to May 2024 Consultation, pp.40-41; Parenting Focus response to May 2024 Consultation, p.25; Welsh Government response to May 2024 Consultation, p.8.

<sup>86</sup> Brave Movement response to May 2024 Consultation, p.1; Samaritans response to May 2024 Consultation, p.4.

<sup>87</sup> [Consultation on draft Guidance: A safer life online for women and girls](#)

Assessments help us to comply with our duties under section 3 of the 2003 Act to have regard to relevant factors.

- 3.38 In particular, due to overlap with the protected characteristics under the Equality Act 2010 and the Northern Ireland Act 1998, we have had regard as a part of our Equality Impact Assessment to the vulnerability of those whose circumstances appear to put them in need of special protection, and to the needs of disabled people and older people. Our Equality Impact Assessment can be found in Volume 6, Annex 5. We have also set out our Welsh Language Assessment in Annex 5, which considers the potential impact of our policies on opportunities for people to use the Welsh language and for the Welsh language to be treated no less favourably than English.

## Approach to compliance

### Summary of responses

- 3.39 Various stakeholders expressed concern about how we will ensure compliance with the duties in the Act and effective implementation of the Codes.<sup>88</sup>
- 3.40 Some stakeholders called for robust enforcement to ensure providers comply with their duties under the Act, including significant penalties for non-compliance.<sup>89</sup> Others called for greater transparency from service providers to incentivise progress and ensure they can be held to account.<sup>90</sup> Some stakeholders suggested new measures to aid effective implementation of the Codes, including auditing of algorithms and AI systems, information-sharing or product testing.<sup>91</sup>
- 3.41 Various stakeholders called for the Codes to be supported by examples and resources to help small businesses come into compliance.<sup>92</sup>

### Our response

- 3.42 We have not made any changes to the measures in light of this stakeholder feedback. We have various tools at our disposal to ensure providers comply with their duties in the Act. Our Supervision Team is establishing relationships with the largest and riskiest service providers to ensure they understand our expectations and come into compliance quickly.

---

<sup>88</sup> National Crime Agency (NCA) response to May 2024 Consultation, p.17; Welsh Government response to May 2024 Consultation, p.9; Marie Collins Foundation response to May 2024 Consultation, pp.2-3; Parenting Focus response to May 2024 Consultation, p.24; Association of Police and Crime Commissioners (APCC) response to May 2024 Consultation, p.10; Health Professionals for Safer Screens response to May 2024 Consultation, p.8.

<sup>89</sup> NCA response to May 2024 Consultation, p.17; Welsh Government response to May 2024 Consultation, p. 9; APCC response to May 2024 Consultation, p.10; Parenting Focus response to May 2024 Consultation, p.24.

<sup>90</sup> Parenting Focus response to May 2024 Consultation, p.25; Integrity Institute response to May 2024 Consultation, pp.8-9, 17; Smartphone Free Childhood response to May 2024 Consultation, p. 6; Northern Ireland Commissioner for Children and Young People (NICCY) response to May 2024 Consultation, pp.20-21, 38.

<sup>91</sup> NCA response to May 2024 Consultation, p.6; Parenting Focus response to May 2024 Consultation, p.10; 5Rights Foundation response to May 2024 Consultation, p.9; UK Safer Internet Centre (UKSIC) response to May 2024 Consultation, p. 7; Online Safety Act (OSA) Network response (2) to May 2024 Consultation, p.5; Molly Rose Foundation response to May 2024 Consultation, pp.12, 46; Samaritans response to May 2024 Consultation, p.4; NSPCC response to May 2024 Consultation, p.62.

<sup>92</sup> Federation of Small Businesses (FSB) response to May 2024 Consultation, pp.1, 5; Yoti response to May 2024 Consultation, p.16; Parenting Focus response to May 2024 Consultation, p.24.

Where needed, they will push providers to make improvements to the safety of their services. Where we become aware of instances of non-compliance, we have powers to take enforcement action. We make decisions about whether to open enforcement investigations on a case-by-case basis, having regard to our statutory duties, our Online Safety Enforcement Guidance<sup>93</sup> and all relevant information.

- 3.43 Where we find a service provider has contravened its duties, we have the power to impose a penalty of up to 10% of qualifying worldwide revenue or £18 million (whichever is the greater) and require remedial action to be taken. In exceptional cases of continued non-compliance where there is a significant level of risk of harm to users (especially children), we may apply to the court for an order that requires third parties to take action to disrupt the provision of a non-compliant regulated service – either by restricting the supply of services to the service provider (such as advertising or payment services) or by restricting access to the service itself. See Section 9 of our Online Safety Enforcement Guidance for more detail.
- 3.44 We will always consider the evidence of harm occurring before taking enforcement action. We expect our early enforcement action to focus on ensuring providers are adequately assessing risk and putting in place the measures that will have the greatest impact of children’s safety. It is important that we take action in an efficient and effective way, in accordance with our regulatory principles and in line with our priority framework. More detail can be found in our Online Safety Enforcement Guidance.
- 3.45 We intend to use transparency reporting as another tool to incentivise compliance. In July 2024, we published our draft transparency reporting guidance which set out the process that we will adopt for deciding what providers must include in their transparency reports, and how information from these reports will be used to inform Ofcom’s own transparency report and help the public make informed decisions about the services they choose to use.<sup>94</sup> We aim to publish the final transparency guidance in the first half of 2025.
- 3.46 In response to stakeholders’ suggestions that we provide resources to help smaller providers comply, we also have a programme of work to make the regulations accessible – and compliance more easily attainable – for providers of all online services in scope of the Act, which include many small or medium-sized enterprises. We launched a new ‘digital safety toolkit’, which consists of interactive tools for regulated firms.<sup>95</sup> We will be launching a new version of this in May 2025 to support compliance with the Protection of Children duties. This service builds on our online safety Regulation Checker (which firms and individuals can use to check if the rules apply to their service), our ‘quick guides’ to the proposed regulations, and our business enquiries service.

---

<sup>93</sup> [Online Safety Enforcement Guidance](#)

<sup>94</sup> Ofcom, 2024 [Consultation: Draft transparency reporting guidance](#).

<sup>95</sup> See [How to comply with the illegal content rules](#)

## International alignment

### Summary of responses

- 3.47 A number of stakeholders encouraged us to consider international regulatory alignment.<sup>96</sup> The Association for UK Interactive Entertainment (Ukie) said that it was important for regulation to reflect the global nature of many of the services in the gaming and interactive entertainment sector.<sup>97</sup> Meta Platforms Inc. (Meta), [X], TikTok, and Yoti encouraged alignment with the EU Digital Services Act (DSA).<sup>98</sup> Meta also encouraged regulatory coherence with data protection obligations.<sup>99</sup> The Family Online Safety Institute (FOSI) and TikTok noted the work of the Global Online Safety Regulators Network (GOSRN).<sup>100</sup>

### Our response

- 3.48 Ofcom is at the heart of several international regulatory networks that are designed to enhance online safety protections across the world. For example, we co-founded GOSRN in 2022 and are Chair of the Network in 2025. GOSRN is the only global space dedicated exclusively to coordination among regulators on online safety. Where appropriate, the network aims to enhance coherence and coordination amongst international regulators, by providing a space for them to share insights, experience, and best practice.
- 3.49 GOSRN has published a regulatory index that provides a comparison for how members are approaching their respective regulatory duties. The regulatory index is designed to further support regulators' activities towards regulatory coherence, as first outlined in the network's position statement on regulatory coherence and coordination in 2024. GOSRN has also published a three-year strategy outlining five priorities. These include building regulatory coherence across jurisdictions and facilitating the sharing of information and coordination to promote compliance.
- 3.50 We continuously engage with regulatory counterparts across the globe, as well as with a range of international multistakeholder forums. We will continue to engage internationally and work with other regulators active in online safety to further regulatory coherence where appropriate. More information on our international online safety work is available on our website.

## Building our evidence base

### Summary of responses

- 3.51 Stakeholders including Parenting Focus and Meta noted the need for us to regularly review current and emerging harms to ensure we can respond. A range of stakeholders also

---

<sup>96</sup> Common Sense Media response to May 2024 Consultation, p.13; Family Online Safety Institute (FOSI) response to May 2024 Consultation, p.4; Meta response to May 2024 Consultation, p.3. [X]; TikTok response to May 2024 Consultation, p.2; Yoti response to May 2024 Consultation, p.24.

<sup>97</sup> Ukie response to May 2024 Consultation, p.32.

<sup>98</sup> Meta response to May 2024 Consultation, p.3. [X]; TikTok response to May 2024 Consultation, p.2; Yoti response to May 2024 Consultation, p.24.

<sup>99</sup> Meta response to May 2024 Consultation, p.3.

<sup>100</sup> FOSI response to May 2024 Consultation, p.4; TikTok response to May 2024 Consultation, p.2.



strongly encouraged us to seek feedback from children to develop measures to keep children safe online.

### Our response

- 3.52 We agree with stakeholders about the importance of ensuring that our guidance and Codes measures remain effective and up to date as new technologies and harms emerge. An essential element of this will be to build up our robust evidence base which we have relied on to make our decisions. For example, the programme of research we detail in paragraphs 3.16 -3.18 – will help us to continue gaining deeper insights into emerging research about how services are complying with their duties to protect children from existing and emerging harms. Only through this will we be able to update our guidance and develop and propose further measures to respond to new risks and harms.
- 3.53 As outlined in paragraph 3.16 –3.18, we will also continue to ensure our evidence base includes children’s perspectives particularly as we further develop the published guidance, Children’s Register and Codes.

## Ofcom’s duties and the consultation process

### Summary of responses

- 3.54 The 5Rights Foundation argued that we should identify the limits of our regulatory powers and report on this to the Secretary of State for Science, Innovation and Technology.<sup>101</sup> It also suggested we should publish a legal opinion on (1) whether we can include measures where the evidence base is incomplete; (2) whether “outcomes-based measures” can meet the clarity requirements of Schedule 4 of the Act; and (3) whether, in the absence of measures, we must require the risk to be disabled until a measure can be found.
- 3.55 The 5Rights Foundation also commented that our position that we cannot make substantive changes in response to the May 2024 Consultation unless we reconsult is out of step with other regulators and undermines the purpose of a consultation. It suggested that legal opinion should be sought on the level of discretion we have to change the Codes following consultation.<sup>102</sup>

### Our response

- 3.56 In Section 2, we set out the legal duties and obligations on us, including those under the Act and the 2003 Act, and consider that this clarifies the limits of our powers and regulatory functions.
- 3.57 However, as part of the process of preparing the Codes for this statement, where appropriate, following further consideration of stakeholder feedback, we have updated the measures from the drafts proposed in the May 2024 Consultation.

---

<sup>101</sup> 5Rights Foundation response to May 2024 Consultation, p 3.

<sup>102</sup> 5Rights Foundation response to May 2024 Consultation, pp14-15