

# User Empowerment Assessment Guidance

---

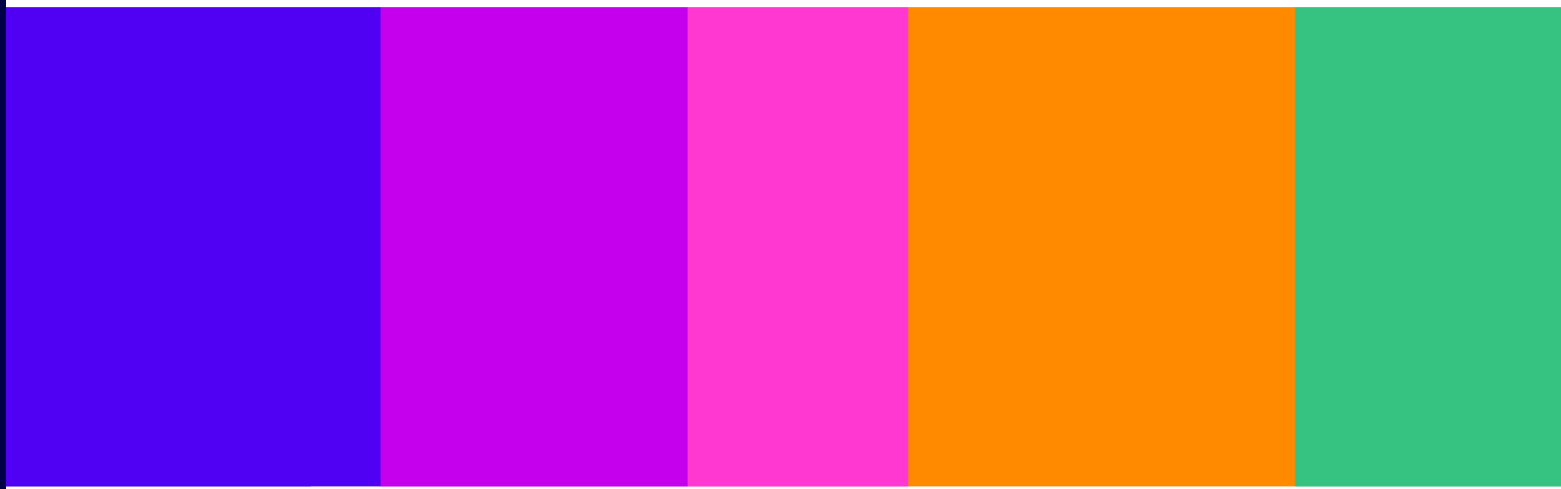
Draft Guidance for Providers of Category 1  
Services on Compliance with Section 14 of  
the Online Safety Act 2023

## Draft Guidance

Published 10 July 2026

Closing date for responses: 02 October 2026

For more information on this publication, please visit [ofcom.org.uk](https://www.ofcom.org.uk)



# Contents

---

## Section

1. Introduction.....	4
2. User empowerment assessment duties.....	5
3. Overview of the four-step assessment process.....	12
4. Detailed explanation of the four steps.....	15
5. Evidence inputs .....	27
6. Likelihood Level Table .....	34
7. Making a significant change to your service.....	37

## Annex

A1. Appendix A: Evidence relating to which users are likely to be affected by each category of relevant content.....	40
A2. Appendix B: Comparison of children’s and illegal content risk assessment duties.....	43

# **Part 1: Duties and carrying out your assessment**

---

DRAFT FOR CONSULTATION

# 1. Introduction

- 1.1 This User Empowerment Assessment Guidance aims to help providers of Category 1 services<sup>1</sup> (providers) comply with their user empowerment assessment duties under section 14 of the Online Safety Act 2023 (the Act). The user empowerment assessment is intended to improve providers' understanding of the likelihood of adult users encountering 'relevant content' on a service, and what features they should offer to increase users' control over such content. 'Relevant content' for the purpose of the user empowerment duties is content which encourages, promotes or provides instructions for suicide, self-harm or an eating disorder, or content which is abusive or incites hatred against race, religion, sex, sexual orientation, disability or gender reassignment.<sup>2</sup>
- 1.2 This assessment is separate and additional to the illegal content risk assessment that all providers of Category 1 services must complete,<sup>3</sup> and to the children's risk assessments that providers of Category 1 services likely to be accessed by children must also complete.<sup>4</sup>
- 1.3 Ofcom must produce guidance to help providers carry out a suitable and sufficient assessment.<sup>5</sup> This guidance also uses the four-step methodology in Ofcom's Illegal Content Risk Assessment Guidance and Ofcom's Children's Risk Assessment Guidance, adapted as appropriate to reflect the user empowerment assessment duties.<sup>6</sup>
- 1.4 The guidance consists of three parts and appendix A1 and A2:
- a) Part 1 includes a summary of the user empowerment assessment duties.
  - b) Part 2 includes:
    - The four-step methodology: We recommend that providers follow these steps to carry out their assessments.
    - What evidence to use: Assessments require evidence to ensure they are suitable and sufficient. We expect providers to consult 'core' evidence inputs and advise that providers also consider more than one of the 'enhanced' evidence inputs, where this is available or appropriate.
    - When to review or carry out a new assessment: Guidance on how to keep an assessment up to date and the circumstances under which providers need to carry out a new assessment.
  - c) Part 3 includes supporting information for completing each step in the four-step methodology
  - d) Appendix A1 contains evidence relating to users likely to be affected by relevant content
  - e) Appendix A2 contains a comparison of the user empowerment assessment duties and the children's and illegal content risk assessment duties.

---

<sup>1</sup> Ofcom, 2026. [Register of Categorised Services](#).

<sup>2</sup> Section 16(3) to (5) of the Act.

<sup>3</sup> Section 7(2)(a) and (9) of the Act.

<sup>4</sup> Sections 7(4)(a) and 11 of the Act.

<sup>5</sup> Section 52(1) of the Act.

<sup>6</sup> Section 15(8) of the Act also requires providers to publish a summary of the findings of their most recent user empowerment assessment in their terms of service. This is covered in the Additional Duties Code of Practice for Category 1 services.

## 2. User empowerment assessment duties

2.1 This part of the guidance explains the user empowerment assessment duties.

### What are the user empowerment assessment duties?

---

2.2 You must carry out a suitable and sufficient assessment for the purposes of the user empowerment duty in section 15(2) of the Act.<sup>7</sup>

2.3 Section 15(2) of the Act requires you to include in your service, to the extent that it is proportionate to do so, features which adult users may use or apply if they wish to increase their control over specified kinds of content (we refer to these as ‘control features’).<sup>8</sup> The Act states that all the findings of the user empowerment assessment are relevant for determining which control features it is proportionate for providers to offer to their adult users.<sup>9</sup>

2.4 The kinds of content to which the user empowerment duties apply are:

- a) content that encourages, promotes or provides instructions for:
  - suicide or an act of deliberate self-harm, or
  - an eating disorder or behaviours associated with an eating disorder;
- b) content that is abusive and the abuse targets any of race, religion, sex, sexual orientation, disability or gender reassignment; and
- c) content that incites hatred against people of a particular race, religion, sex or sexual orientation, who have a disability or who have a characteristic of gender reassignment.<sup>10</sup>

2.5 Further details and examples of relevant content are provided in the draft Guidance on Relevant Content.

2.6 The Act sets out the specific matters Category 1 service providers need to assess for their service.<sup>11</sup> These matters include: the user base, the incidence of relevant content on their service, the likelihood of adult users encountering each kind of relevant content, the likelihood of adult users with certain characteristics or members of a certain group encountering content that particularly affects them, the functionalities of a service, the way the service is used, and how the design of the service affects the likelihood of adult users encountering such content.

---

<sup>7</sup> Sections 7(5)(c) and 14 of the Act.

<sup>8</sup> Section 15(3) of the Act states that the features referred to in section 15(2) are those which, if used or applied by a user, result in the use by the service of systems or processes designed to effectively (a) reduce the likelihood of the user encountering relevant content present on the service, or (b) alert the user to content present on the service that is a particular kind of relevant content.

<sup>9</sup> Section 16(1) sets out that in determining what is proportionate for the purposes of section 15(2), all the findings of the most recent user empowerment assessment and the size and capacity of the provider of the service are particularly relevant.

<sup>10</sup> Section 16(3) to (5) of the Act.

<sup>11</sup> Section 14(5) of the Act.

- 2.7 Your assessment must be suitable and sufficient,<sup>12</sup> which we explain in more detail in ‘What is a “suitable and sufficient” assessment?’ at paragraphs 2.12-2.16.
- 2.8 If you have more than one Category 1 service, you need to complete a separate assessment for each service.<sup>13</sup>
- 2.9 Once you have completed your first user empowerment assessment for each service, there are several duties in the Act related to reviewing or updating existing assessments, and completing new assessments:
- a) You must take appropriate steps to keep your assessment up to date.<sup>14</sup>
  - b) You must carry out a further suitable and sufficient assessment before making any significant change to any aspect of your service’s design or operation, relating to that proposed change.<sup>15</sup> We explain what we intend for providers to do with significant change in section 7, ‘Making a significant change to your service’ at paragraphs 7.1-7.5.
  - c) You must keep a record of each user empowerment assessment you carry out, including details about how the assessment was carried out and its findings.<sup>16</sup> We have published separate Record-Keeping and Review Guidance to help you with this.<sup>17</sup>
  - d) You must also supply Ofcom with a copy of the record, in full, as soon as reasonably practicable.<sup>18</sup>

## Why is this guidance important?

---

- 2.10 This guidance is designed to help providers comply with the user empowerment assessment duties in section 14 of the Act.
- 2.11 The user empowerment assessment duties are enforceable by Ofcom.<sup>19</sup> When considering whether a provider has complied with them, we will consider whether it has acted in accordance with this guidance.

## What is a ‘suitable and sufficient’ assessment?

---

- 2.12 Your assessment must be ‘suitable and sufficient’.
- 2.13 To be suitable and sufficient, your assessment must consider all the matters specified in the Act.<sup>20</sup> We set these out in detail in paragraphs 2.24-2.26, ‘What do you need to assess about each category of relevant content?’.
- 2.14 Your assessment should be specific to your service and accurately reflect the likelihood of adults encountering each category of relevant content on your service as it exists at the time of your assessment cycle (see paragraph 2.21-2.23 ‘What content do you need to assess?’). You should assess the likelihood of adult users encountering each category of

---

<sup>12</sup> Section 14(2) of the Act.

<sup>13</sup> See the Categorisation Register.

<sup>14</sup> Section 14(3) of the Act.

<sup>15</sup> Section 14(4) of the Act.

<sup>16</sup> Section 23(9) of the Act.

<sup>17</sup> Our final guidance will include a link to the [updated Record Keeping and Review Guidance](#). We have published a [draft version of our guidance](#) with proposed updates alongside on our consultation.

<sup>18</sup> Section 23(10) of the Act.

<sup>19</sup> Section 131 of the Act

<sup>20</sup> Section 14(5) of the Act.

relevant content as high, medium, low and negligible (our guidance is intended to help you with this assessment).

- 2.15 Your assessment should be based on relevant information and evidence, so that it accurately reflects the likelihood of adults encountering each category of relevant content on your service. See ‘Evidence inputs’ in section 5 for more details on the kinds of evidence you should consider.
- 2.16 This guidance provides more detail on how you should carry out this assessment and make a judgement about the likelihood of adults encountering relevant content on your service.

## What happens if you do not complete a suitable and sufficient assessment?

---

- 2.17 If we suspect you have failed to carry out a suitable and sufficient user empowerment assessment, then we are able to take enforcement action.<sup>21</sup> Any decision on whether to take enforcement action would be made in line with the Online Safety Enforcement Guidance.<sup>22</sup>
- 2.18 If we find that your service has contravened its obligations, we can 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.<sup>23</sup>

## When do you need to do a first user empowerment assessment to meet the obligations in the Act?

---

- 2.19 If your service is in operation and is a Category 1 service on the date this guidance is published, you need to complete your first assessment within three months of this date.<sup>24</sup>
- 2.20 If your service becomes a Category 1 service (whether or not it has previously been a Category 1 service) you must complete your first assessment within three months from the first day on which your service becomes Category 1.<sup>25</sup>

## What content do you need to assess?

---

- 2.21 Carrying out an assessment for the purpose of the user empowerment duties requires you to assess the likelihood of adults encountering relevant content on your service.
- 2.22 Providers should assess the likelihood of adults encountering the following three categories of relevant content:<sup>26</sup>
- a) Suicide and self-harm content: This is content that encourages, promotes or provides instructions for suicide or an act of deliberate self-harm.
  - b) Eating disorder content: This refers to content that encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder.

---

<sup>21</sup> Section 131 of the Act.

<sup>22</sup> See Ofcom, 2024. [Online Safety Enforcement Guidance](#).

<sup>23</sup> Section 143 of the Act and Schedule 13 to the Act.

<sup>24</sup> Part 2 of Schedule 3 to the Act.

<sup>25</sup> Part 2 of Schedule 3 to the Act.

<sup>26</sup> Section 16(3) to (5) of the Act.

- c) Hate and abuse content: This is content that is abusive towards or incites hatred against race, religion, sex, sexual orientation, disability or gender reassignment.
- 2.23 You should consult our draft Guidance on Relevant Content to support judgements about whether content on a service is relevant content.

## What do you need to assess about each category of relevant content?

---

- 2.24 To meet the requirements of the user empowerment assessment duties, you must assess all the matters in section 14(5)(a)-(g) of the Act, which are:
- a) the user base;
  - b) the incidence of relevant content on the service;
  - c) the likelihood of adult users of the service encountering, by any means of the service, each kind of relevant content (with each kind separately assessed), taking into account (in particular) algorithms used by the service, and how easily, quickly and widely content may be disseminated by means of the service;
  - d) the likelihood of adult users with a certain characteristic or who are members of a certain group encountering relevant content which particularly affects them;
  - e) the likelihood of functionalities of the service facilitating the presence or dissemination of relevant content, identifying and assessing those functionalities more likely to do so;
  - f) the different ways in which the service is used, and the impact of such use on the likelihood of adult users encountering relevant content; and
  - g) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to strengthen adult users' control over their interaction with user-generated content, and other systems and processes) may reduce or increase the likelihood of adult users encountering relevant content.
- 2.25 Categories of illegal content, content harmful to children and relevant content are closely related and the ways they manifest on services are likely to be similar. You should therefore consult Ofcom's Register of Risks for illegal content (Illegal Harms Register) and Children's Register of Risks (Children's Register), which contain evidence, research and analysis that can support your user empowerment assessment.<sup>27</sup> You may also find it useful to consult the Illegal Content Risk Profiles and Children's Risk Profiles to support your understanding of which functionalities and characteristics of your service may affect or impact the likelihood of users encountering relevant content.<sup>28</sup>
- 2.26 Based on your assessment, you should then assign a level to reflect the likelihood of adult users encountering each kind of relevant content (negligible, low, medium or high). You can find more detail in section 6, 'Likelihood Level Table'.

## Record-keeping duties

---

- 2.27 Section 23(9) and (10) of the Act specifies the following:
- a) You are required to keep a written record, in an easily understandable form, of each assessment you carry out, including details about how the assessment was carried out

---

<sup>27</sup> Ofcom, 2024. [Illegal Harms Register](#); Ofcom, 2025. [Children's Register](#).

<sup>28</sup> Ofcom, 2024. [Protecting people from illegal harms online. Risk Assessment Guidance and Risk Profiles](#); Ofcom, 2025. [Children's Risk Assessment Guidance and Children's Risk Profiles](#).

and its findings.<sup>29</sup> We have provided Record-Keeping and Review Guidance to help providers understand what is expected of them and what to record. We provide further information at paragraphs 4.41-4.43 in this document.<sup>30</sup>

- b) You are required to provide Ofcom with a copy of your assessment record in full as soon as reasonably practicable after making the record, or revising it.

## Keeping your assessment up to date

---

- 2.28 The Act includes the following duties about reviewing or carrying out a new assessment:
- a) a duty to take appropriate steps to keep an assessment up to date;<sup>31</sup> and
  - b) before making any significant change to any aspect of a service’s design or operation (as explained in section 7, ‘Making a significant change to your service paragraphs 7.1-7.5), a duty to carry out a further suitable and sufficient assessment relating to the impacts of that proposed change.<sup>32</sup>
- 2.29 To keep an assessment up to date, we propose that you review your assessments at least every 12 months. It is likely that your assessment will become out of date over time, even if you have not made any significant changes to your service. This is because incremental changes to your service, trends in users’ behaviours and technological changes can alter the evidence base underpinning your assessment, which would require you to review your assessment. This approach is consistent with our recommendations for the review period for the illegal content and children’s risk assessments.
- 2.30 Reviewing your assessment can be done by considering your most recent assessment alongside any new evidence that you have collected during the operation of your service, changes to the service or any recent relevant developments in the external environment which you consider your user empowerment assessment should account for in order to be suitable and sufficient.
- 2.31 Depending on the circumstances, it may be appropriate to fully review your assessment (e.g., as a matter of course at least every year), or target the review to specific aspects of your service (e.g., due to the introduction of a new feature or functionality outside a regular annual review cycle).
- 2.32 We recognise that some providers may want to consider the timing of their assessment in the context of their obligations under other legal requirements This is a matter for individual providers, provided that the approach they take meets their obligations under the Act.

## Relevance of the illegal content and children’s risk assessments

---

- 2.33 The Act sets out that all providers must conduct an illegal content risk assessment,<sup>33</sup> and providers of services likely to be accessed by children must also carry out a children’s risk

---

<sup>29</sup> Section 23(9) of the Act.

<sup>30</sup> Our final guidance will include a link to the updated Record Keeping and Review Guidance. We have published a [draft version of our guidance](#) with proposed updates alongside on our consultation.

<sup>31</sup> Section 14(3) of the Act.

<sup>32</sup> Section 14(4) of the Act.

<sup>33</sup> Section 7(2)(a) and (9) of the Act.

assessment.<sup>34</sup> Given the similarities across the three sets of duties, we have taken a similar approach across the three pieces of guidance to streamline them.

- 2.34 You may decide to carry out your illegal risk assessment and, if you are in scope, your children’s risk assessment concurrently with your user empowerment assessment. While this is a matter for providers, if you take this approach, you must ensure each assessment is distinct and clearly identifiable, and hold separate records for each assessment.
- 2.35 Some characteristics of the service that affect the level of risk of illegal content and content harmful to children (such as user base, functionalities and the ways in which a service is used) are also likely to be relevant for your user empowerment assessment.
- 2.36 The findings of your illegal content and, if your service is in scope, your children’s risk assessments may inform your assessment under the user empowerment duties. For example, evidence on illegal hateful content may also support your assessment of content that incites hatred that does not meet the bar of illegality.

---

<sup>34</sup> Sections 7(4)(a) and 11 of the Act.

# **Part 2: How to carry out an assessment**

---

DRAFT FOR CONSULTATION

# 3. Overview of the four-step assessment process

## Step 1: Understand what content needs to be assessed

3.1 Step 1 will help you understand what content you must assess under the user empowerment duties and will assist you to make accurate judgements about the likelihood of adult users encountering such content on your service.

### Sequence of activities and outcomes

- Consult our draft Guidance on Relevant Content for examples of content Ofcom considers to be, or not to be, content to which the section 15(2) duty applies.
- Identify the three categories of relevant content that need to be separately assessed that may be relevant to your service, as described at paragraph 2.4:
  - a) suicide and self-harm content,<sup>35</sup>
  - b) eating disorder content,<sup>36</sup> and
  - c) hate and abuse content.<sup>37</sup>

### Essential records

- A record of the consideration of each matter in section 14(5) of the Act, including but not limited to:
  - the incidence of each category of relevant content on the service;
  - where applicable, a list of any characteristics, functionalities and design features considered (including user base, business models, governance, and systems and processes), which should state how you have identified and assessed those functionalities that may increase the likelihood of adult users encountering relevant content; and
  - if you have considered the role of any existing controls already in operation on your service at the time of the assessment, a record of what these are, and how the consideration of these has impacted the level of likelihood you have assigned to each category of relevant content.
- A list of the evidence and summary of the reasoning that has informed the assessment of likelihood. This should include relevant evidence about the design and use of the service, and how you have considered any adult users likely to be particularly affected.
- The likelihood level for each category of relevant content and an evidence-based explanation of the decisions. This level should reflect the likelihood levels as they exist on the service at the time of the assessment.

---

<sup>35</sup> Section 16(3)(a) of the Act.

<sup>36</sup> Section 16(3)(b) of the Act.

<sup>37</sup> Sections 16(4) and (5) of the Act.

## Step 3: Decide measures to offer to adult users and record

---

- 3.2 Step 3 will help you identify any control features that you should offer to adult users to reduce their likelihood of encountering relevant content, or to alert them to the presence of such content and make a record of any features you are offering them.

### Sequence of activities and outcomes

- Consult Ofcom's Additional Duties Code of Practice for Category 1 Services, check which user empowerment measures the Code recommends you offer to adult users based on the likelihood level and your service's functionalities, and decide whether to implement applicable measures or to use alternative measures.
- Implement all relevant measures or alternative measures.
- Record the outcomes of the assessment.

### Essential records

- A complete record of the findings of the assessment.
- A record of all user empowerment measures from the Additional Duties Code that have been, or are planned to be, offered to adult users.
- A record of any applicable user empowerment measures from the Additional Duties Code that you do not plan to offer to adult users, and the alternative measures that you have offered or plan to offer instead, with information that demonstrates how these alternative measures meet the relevant duties.

## Step 4: Report, review and update

---

- 3.3 Step 4 sets out what to report to Ofcom, helps you understand how to keep your assessment up to date, and outlines how to put in place appropriate steps to review your assessment.

### Sequence of activities and outcomes

- Monitor the effectiveness of the measures that you offer to adult users to reduce their likelihood of encountering relevant content, or to alert them to the presence of such content.
- Supply Ofcom with a copy of your full assessment record.<sup>38</sup>
- Include a summary of the findings of your most recent assessment in your service's terms of service.<sup>39</sup>
- Review and/or update the assessment when appropriate, including before making any significant change to any aspect of the service's design or operation.

### Essential records

- A written summary of the annual review cycle for the assessment.

---

<sup>38</sup> Section 23(10) of the Act.

<sup>39</sup> As per Measure ADU D1 of the Code.

**Figure 1: Summary of the four-step assessment process**

STEP	ACTIONS YOU SHOULD TAKE	WHAT YOU SHOULD KEEP A RECORD OF
<p><b>Step 1:</b> Understand what content needs to be assessed</p>	<ul style="list-style-type: none"> <li>• Consult Ofcom’s Guidance on Relevant Content</li> <li>• Identify the relevant content that needs to be assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Confirmation that you have consulted Ofcom’s Guidance on Relevant Content</li> </ul>
<p><b>Step 2: assess likelihood</b></p>	<ul style="list-style-type: none"> <li>• Assess each matter set out in section 14(5) of the Act</li> <li>• Identify and use core and enhanced evidence to help inform these assessments</li> <li>• Determine the likelihood of adults encountering each category of relevant content</li> <li>• Consult the Likelihood Level Table and assign a likelihood level for each category of relevant content</li> </ul>	<ul style="list-style-type: none"> <li>• The assessment of each matter in section 14(5) of the Act</li> <li>• The consideration of any existing control tools</li> <li>• A list of the evidence and reasoning for your assessment of likelihood for each category of relevant content</li> <li>• A likelihood level, with evidence, for each category of relevant content</li> </ul>
<p><b>Step 3:</b> Decide measures to offer to adult users and record</p>	<ul style="list-style-type: none"> <li>• Consult Ofcom’s Additional Duties Code of Practice</li> <li>• Decide which user empowerment measures to implement</li> <li>• Implement all relevant measures or alternative measures</li> <li>• Record the findings of your assessment</li> </ul>	<ul style="list-style-type: none"> <li>• All measures from Ofcom’s Additional Duties Code of Practice that are or will be offered</li> <li>• Any alternative measures you have implemented with explanation of how these achieve compliance</li> <li>• The findings of your assessment, including details about how it has been carried out</li> </ul>
<p><b>Step 4:</b> Report, review and update</p>	<ul style="list-style-type: none"> <li>• Monitor the effectiveness of the measures</li> <li>• Supply Ofcom with a copy of your full assessment record</li> <li>• Include a summary of the findings of your most recent assessment in your Terms of Service</li> <li>• Review and/or update the assessment when appropriate, including before making any significant change to any aspect of the service’s design or operation.</li> </ul>	<ul style="list-style-type: none"> <li>• Written record of the annual review cycle for the assessment</li> </ul>

## 4. Detailed explanation of the four steps

4.1 This part explains in detail the activities and outcomes for each step of your assessment.

### Step 1: Understand what content needs to be assessed

4.2 The objectives of this step are for you to identify and develop an understanding of the categories of content to assess.

#### Sequence of activities and outcomes for Step 1

##### Identify what content you need to assess for the purpose of the user empowerment assessment duties

4.3 Section 16 of the Act sets out the kinds of content captured by the user empowerment duties. All Category 1 service providers are required to assess the likelihood of adult users encountering each kind of relevant content on their service.

4.4 **Table 1** outlines the categories of content you must assess. As part of the first step of your assessment, we recommend that you familiarise yourself with this list and review Ofcom's Guidance on Relevant Content.

**Table 1: List of relevant content**

Content you must assess for the purpose of the user empowerment duties	
a)	<b>Content that encourages, promotes or provides instructions for suicide or an act of deliberate self-harm (suicide and self-harm content);</b>
b)	<b>Content that encourages, promotes or provides instructions for an eating disorder or behaviours associated with an eating disorder (eating disorder content); and</b>
c)	<b>Content that is abusive and targets race, religion, sex, sexual orientation, disability or gender reassignment, and/or content that incites hatred against people:</b>
	<ul style="list-style-type: none"><li>○ <b>of a particular race, religion, sex or sexual orientation;</b></li><li>○ <b>who have a disability; or</b></li><li>○ <b>who have the characteristics of gender reassignment (hate and abuse content).</b></li></ul>

#### Essential records for Step 1

- You should keep a record confirming that you have consulted Ofcom's draft Guidance on Relevant Content.

### Step 2: Assess the likelihood of adults encountering relevant content

4.5 In Step 1, you will have understood the categories of relevant content that you need to assess for your service.

- 4.6 This step is for you to assess the likelihood of adult users encountering each category of relevant content on the service, by assessing each of the matters in section 14(5) of the Act. This includes considering how the design and use of your service affects the likelihood of adults encountering relevant content.
- 4.7 One of the objectives of this step will be to use evidence to separately assess and assign a level to reflect the likelihood of adult users encountering each category of relevant content (high, medium, low and negligible). When doing this, you must also give consideration to the likelihood of relevant content being encountered by adult users from certain groups or with a certain characteristic who are likely to be particularly affected by that content (see Appendix A1, 'Evidence relating to which users are likely to be affected by each category of relevant content' for further details).
- 4.8 Your assessment should not be limited to considering individual pieces of content, but should consider how your service is used overall.

## Sequence of activities and outcomes for Step 2

- 4.9 You should now assess the likelihood of adult users encountering each category of relevant content on the service. It should be noted that the level of likelihood of adult users encountering relevant content can be influenced by various elements, including your service's functionalities, user base (including adult users likely to be particularly affected by relevant content), business model, and systems and processes. In combination, these can serve to increase or decrease the likelihood of adults encountering relevant content. This means that you should first assess the following matters set out in section 14(5) of the Act:
- the user base of the service;
  - the incidence of relevant content on the service;<sup>40</sup>
  - how easily and quickly content can be disseminated on the service, taking into account algorithms;
  - the likelihood of functionalities of the service's design or operation which could increase the likelihood of adult users encountering relevant content identifying and assessing those functionalities more likely to do so;
  - the different ways in which the service is used, including ways which are unintended, and the impact of such use on the likelihood of adult users encountering relevant content;
  - how the design and operation of the service, including the business model, governance, use of proactive technology and other systems and processes may reduce or increase the likelihood of adult users encountering relevant content; and
  - the effectiveness and scope of any existing control measures which could impact the likelihood of adults encountering relevant content, including those adults likely to be particularly affected by it.

---

<sup>40</sup> We consider that incidence in this context refers to the amount of relevant content on your service. For example, if you have assessed that there is a significant amount of relevant content on your service then your starting assumption may be that users are likely to encounter it.

- 4.10 To assess these matters you should refer to the appropriate core and/or enhanced evidence inputs (e.g., user complaints and reports, evidence drawn from existing controls, results of content moderation systems, results of product testing, consultation with users and/or representative groups, and evidence from internal and/or external experts).
- 4.11 Having assessed these matters, you should then use your findings and any other relevant evidence from the core and enhanced evidence inputs to assess the likelihood of users encountering each category of relevant content. As part of this assessment, you should also consider the likelihood of adult users of the service with a certain characteristic or who are members of a certain group encountering relevant content on the service which may particularly affect them.
- 4.12 You should then consult the Likelihood Level Table (**Table 5**) to assign a level for each category of relevant content (the 'likelihood level'). This level should reflect the likelihood of adult users encountering relevant content on your service at the time of assessment.
- 4.13 You may find it useful to consult the Illegal Harms Register and Children's Register as well as the Illegal Content and Children's Risk Profiles to gain a better understanding of how relevant content manifests online. Illegal content, content harmful to children and relevant content are closely related and the ways they manifest on services are likely to be similar. Furthermore, as per our Guidance on Relevant Content, the kinds of relevant content covered by the user empowerment duties are the same as the equivalent categories of primary priority content and priority content that is harmful to children. The evidence included in the Illegal Harms Register and Children's Register is broad and considers content that may be relevant content.
- 4.14 You may also find it helpful to consult the Illegal Content and Children's Risk Profiles to help you consider which functionalities and characteristics of your service may increase the likelihood of adults encountering relevant content.
- 4.15 The assessment should not be a theoretical exercise. You should use evidence to assess the ways the service is, or could be, used. We provide guidance on how this can be done in the following section, 'Identifying relevant evidence'.
- 4.16 To complete a 'suitable and sufficient' assessment, you must assess everything set out in section 14(5) of the Act. You should then assign a level reflecting the likelihood of adults encountering each category of relevant content. You must give separate consideration to each category of relevant content.
- 4.17 To assist you with this, we have provided a Likelihood Level Table (**Table 5**) to help inform your judgement on the level of likelihood of encountering each category of relevant content.

### Identify relevant evidence

- 4.18 You should use appropriate evidence to make accurate judgements about the incidence and overall likelihood of adult users encountering relevant content on your service, as well as how the design and use of the service affect this.
- 4.19 **Table 2** lists the two types of evidence inputs you should consider using: core inputs and enhanced inputs. You should consider all the core inputs and any other relevant information you already hold for each kind of relevant content. We also expect you to consider more than one of the enhanced inputs, and at least the enhanced evidence inputs that you considered for your illegal content and (if applicable) your children's risk assessments, where relevant.

- 4.20 At each stage of your analysis (and having considered the evidence inputs noted above) you should consider whether you have sufficient information to reach accurate conclusions on the level of likelihood for that category of relevant content. If not, you should gather additional evidence from the list of enhanced inputs.
- 4.21 The ‘Evidence inputs’ in section 5 provides more detailed information on these types of evidence.

**Table 2: Summary of relevant types of evidence**

Type	Overview of inputs
<p><b>Core inputs</b></p> <p><i>Providers should consider all these inputs</i></p>	<ul style="list-style-type: none"> <li>• User complaints and reports.</li> <li>• User data (e.g., age, language, groups at risk).</li> <li>• Available evidence relevant to understanding the likelihood of adults with a certain characteristic or who are members of a certain group encountering relevant content which particularly affects them.</li> <li>• Retrospective analysis of incidents that lead to an increase of relevant content on the service.</li> <li>• Ofcom’s draft Guidance on Relevant Content and relevant sections of Ofcom’s Illegal Harms Register and Children’s Register.</li> <li>• Relevant findings of your illegal content risk assessment and, where your service is in scope, your children’s risk assessment.</li> <li>• Results of content moderation systems.</li> <li>• Evidence drawn from existing controls.</li> <li>• Other relevant information (including characteristics that apply to your service that may affect the likelihood of adult users encountering relevant content).</li> </ul>
<p><b>Enhanced inputs</b></p> <p><i>Providers should consider more than one of these inputs based on the nature of their service</i></p>	<ul style="list-style-type: none"> <li>• Results of product testing.</li> <li>• Consultation with internal experts.</li> <li>• Views of independent experts.</li> <li>• Internal and external commissioned research.</li> <li>• Consultation with users.</li> <li>• Result of engagement with relevant representative groups.</li> </ul>
<p><b>Note: These are not exhaustive examples of enhanced inputs and may vary by service or business model.</b></p>	

- 4.22 When considering user data, we encourage you to familiarise yourself with the data protection legislation, and to consult the Information Commissioner’s Office (ICO) guidance on UK General Data Protection Regulation (UK GDPR) requirements.<sup>41</sup>

### Evaluate likelihood by assigning a level to the likelihood of adult users encountering each kind of relevant content

- 4.23 You should use your judgement and consider all relevant evidence to assign a level of high, medium, low or negligible likelihood of adult users encountering each kind of relevant content.
- 4.24 The level of likelihood that you assign to each category of relevant content will be important when considering which content control features you should offer to adult users as part of Step 3.
- 4.25 The level of likelihood that you assign to each category of relevant content will also help adults make informed choices about which content control features they want to apply to have more control over the content they encounter on your service.

### Assess the likelihood of adults encountering relevant content

- 4.26 When evaluating likelihood, you should ask yourself the questions set out in **Box 1**.

---

<sup>41</sup> ICO. [UK GDPR guidance and resources](#). [accessed 19 June 2026].

## Box 1: Guiding questions when assessing the likelihood of adults encountering relevant content currently on your service

**Does your service have any characteristics or functionalities that could make it more likely for users to encounter relevant content?**

**For example, does your service use recommender algorithms or functionalities which allow users to share content widely?**

- Do you have any features or functionalities which affect how much adults use your service, such as a feature that enables content to play automatically?
- Does your service have an in-platform search function?
- Does your service allow users to comment on other users' content?
- If so, how many of these functionalities do you have? We expect that the greater the number, the higher the likelihood of encountering the content.

**Evaluating the likelihood will depend on your understanding of the evidence about your own service.**

- Is there any evidence from your core inputs that indicates adults are likely to encounter relevant content on your service? You should consider:
  - evidence of relevant content being encountered by adults, including adults with certain characteristics, based on user complaints and reports (e.g., significant volumes of reports in relation to a particular kind of relevant content could indicate a higher likelihood of that kind of content occurring);
  - evidence based on results of content moderation of this kind of content, and
  - any other relevant evidence and data which suggests there is a risk of relevant content occurring on your service.
- Is there any additional evidence from enhanced inputs that indicates adults are likely to encounter relevant content on your service? You may consider:
  - evidence based on results of product testing of the potential for adults to encounter relevant content; and
  - evidence from independent experts or externally commissioned research that highlights the potential for adults to encounter this kind of content.
- Are there measures already in place that reduce the likelihood of adults encountering this kind of content on your service? Can you demonstrate that these are effective in decreasing the likelihood of adults encountering this kind of content? For example, you could consider the following:
  - Do you prohibit this kind of content on your service and, if so, do you have effective controls to identify and remove this content from the service?
  - Do you have measures to promote users' media literacy and safe use of the service? It is possible that such measures could reduce the likelihood of relevant content being encountered.

### Assess the user base

- 4.27 You must assess your service's UK user base to conduct a suitable and sufficient assessment. We expect this to reflect your understanding of how many UK users of your service are adults. We recognise providers may have different levels of understanding, evidence and data about the characteristics of their users.
- 4.28 When assigning levels of likelihood to each kind of relevant content, you must take into account the likelihood of relevant content being encountered by certain groups of adult

users who are particularly affected by it.<sup>42</sup> We recognise that providers may have different levels of understanding, evidence and data about their users, and provide guidance on this in 'Evidence relating to which users are likely to be affected by each category of relevant content' in Appendix A1.

- 4.29 We recognise that, in many cases, providers will be unable to determine the characteristics of their users to a high level of confidence. We expect assessments to err on the side of caution. For example, if there is a high number of overall users on your service, we expect you to assume that you also have a high number of users who are likely to be particularly affected by some kinds of relevant content, unless you have appropriate evidence to demonstrate otherwise.

## Essential records for Step 2

- 4.30 You should keep a record of the your assessment of each matter in section 14(5) of the Act, including but not limited to the following:
- The incidence of each category of relevant content on the service.
  - You should keep a list of any characteristics, functionalities and features you have considered (including user base, business models, functionalities, and systems and processes). This should include how you have identified and assessed those functionalities that increase the likelihood of adult users encountering relevant content.
  - If you have considered the role of any existing measures already in operation on your service at the time of the assessment, you should record what these are, how they reduce the likelihood of adults encountering relevant content, and how the consideration of the existing measures has impacted the likelihood level you have assigned to each category of relevant content.
- 4.31 You should keep a list of the evidence and summary of the reasoning that has informed the assessment of likelihood for each category of relevant content, and how this has informed the likelihood level assigned to each. This should include relevant evidence about the incidence of each category of relevant content, the design and use of the service, and how you have considered adult users likely to be particularly affected by relevant content.
- 4.32 You should keep written records of the level of likelihood assigned to each category of relevant content, together with an evidence-based explanation of the decision. This level should reflect the likelihood of adults encountering relevant content as it exists on the service at the time of the assessment.

## Step 3: Decide measures to implement for adult users and record

---

- 4.33 In Step 2, you will have assigned a level of likelihood to each category of relevant content on your service. The objective of this step is to make a record of your assessment, identify any relevant measures that you should offer to adult users based on their likelihood of encountering relevant content on your service, and record any measures you have taken.

---

<sup>42</sup> Section 14(5)(d) of the Act states that providers must assess the likelihood of adult users with a certain characteristic or who are members of a certain group encountering relevant content which particularly affects them.

## Sequence of activities and outcomes for Step 3

### Decide what measures you should offer to your adult users and implement

- 4.34 You should now refer to the user empowerment section of the Additional Duties Code. The measures recommended for your service will be based on your service's functionalities and levels of likelihood of encountering relevant content:
- a) The applicability of the measures will be informed by your assignment of likelihood levels in Step 2. All of the measures apply to providers of services which have a more than negligible likelihood of adults encountering relevant content.
  - b) Functionalities and characteristics of your service will also determine whether certain measures in the Additional Duties Code are recommended for your service.
- 4.35 Providers who choose to implement all applicable measures in the Additional Duties Code will be treated as complying with the user empowerment duties under the Act.

### Alternative measures to consider

- 4.36 You do not have to follow our Additional Duties Code, and you may use alternative measures to comply with your user empowerment duties. If you do take alternative measures, you must keep a record of what you have done and explain how the user empowerment duties have been met.<sup>43</sup> In doing so, you must consider the importance of protecting users' rights to freedom of expression and of protecting users from breaches of relevant privacy laws.<sup>44</sup>

### Implement the relevant measures

- 4.37 Once you have decided which Additional Duties Code measures, or alternative measures, to take, and any additional tools you wish to offer to adult users, you should implement them.

### Change to measures and controls

- 4.38 If you make any changes to existing systems, processes or other measures in place on your service, this could affect the likelihood of adults encountering relevant content and you may need to re-evaluate if your approach is still adequate.
- 4.39 If your existing measures contribute to reducing the likelihood of adults encountering relevant content, we consider that it will be appropriate to continue implementing these, even if they are additional or alternative to those recommended in our Additional Duties Code.
- 4.40 If you stop implementing existing measures, this may constitute a significant change and may impact your likelihood levels. Further guidance on what constitutes a significant change is set out in section 7, 'Making a significant change to your service'.

## Essential records for Step 3

### Record the outcomes of the assessment

- 4.41 At this stage, you must ensure you have a written record of the findings of your assessment, also including details about how it has been carried out. Records should be durable, accessible, easy to understand and up to date, as set out in Ofcom's Record-Keeping and Review Guidance.

---

<sup>43</sup> Section 23(4) of the Act.

<sup>44</sup> Section 49(5) of the Act.

- 4.42 You must keep a record of all measures from Ofcom’s Additional Duties Code that have been, or are planned to be, offered to adult users of your service.
- 4.43 If you have chosen to offer alternative measures, you must record:
- a) the applicable measures that you do not plan to implement,
  - b) the alternative measures that you have implemented or plan to implement instead, and
  - c) information that demonstrates how these measures achieve compliance with the user empowerment duties.
- 4.44 Further information is provided in Section 5 of the Record-Keeping and Review Guidance (‘Records of alternative measures taken to comply with a relevant duty’).
- 4.45 Well-maintained and accurate records and regular, timely reviews of compliance will help you to keep track of how you are complying with the user empowerment duties and ensure that the measures that you are offering to adult users to reduce their likelihood of encountering relevant content, or alert them to the presence of such content, are appropriate.
- 4.46 When making a record of your assessment, you should capture all information shown in **Box 2**. This will help you to ensure that your assessment is suitable and sufficient, that you have considered all elements of section 14 of the Act, and that you have included the evidence you have relied on to assess the likelihood of adults encountering relevant content on your service.

**Box 2: Information to include in the record of your assessment**

- The service to which the user empowerment assessment relates.
- The date the assessment was completed.
- If applicable, the date the assessment was reviewed or updated.
- Confirmation that you have consulted Ofcom’s draft Guidance on Relevant Content.
- Any characteristics or functionalities you have identified by means of which the categories of relevant content may manifest or that increase the likelihood of users encountering relevant content.
- If you have considered the role of any existing measures already in operation on your service at the time of the assessment, a record of what these controls are, how they affect the likelihood of adults encountering relevant content, and how the consideration of the existing measures has impacted the likelihood level you have assigned to the categories of relevant content.
- A record of how you have considered the likelihood of adults encountering relevant content on the service.
- A list of the evidence and summary of the reasoning that has informed the assessment of likelihood for each category of relevant content. This should include relevant evidence about the design and use of the service, and how adult users who are likely to be particularly affected by relevant content have been considered.
- The level of likelihood assigned to each of the categories of relevant content, and an evidence-based explanation of the decision.
- Confirmation that the findings of the assessment have been recorded and reported.
- A summary of all measures from Ofcom’s Additional Duties Code that are being offered or planned for adult users, as well as any applicable measures not being offered and the alternative approaches being implemented instead, including evidence of how these alternatives meet the relevant duties.

- Information regarding how you take appropriate steps to keep the assessment up to date (as part of Step 4).

## Step 4: Report, review and update

---

- 4.47 The objective of this step is to understand how to keep your assessment up to date and reported appropriately, both internally and externally.
- 4.48 In Step 3, you should have made a complete record of your assessment, identified the relevant codes measures to offer to your adult users, and recorded any alternative measures you have taken and explained how they meet the user empowerment duties, as well as which Code measures they are alternatives to.
- 4.49 In this final step, you should understand and implement the systems and processes you will use to review and update your assessment.
- 4.50 We also advise that you monitor the effectiveness of the measures you are offering to adult users to reduce their likelihood of encountering relevant content to help comply with your duty of keeping your assessment up to date.

### Sequence of activities and outcomes for Step 4

#### Monitor the effectiveness of the measures you offer to adult users for the purpose of complying with the user empowerment duties

- 4.51 To help you determine the effectiveness of the measures you offer, we recommend that you monitor the level of likelihood of encountering relevant content for adult users who choose to use the content control features and compare this to the level of likelihood of encountering relevant content for adult users who did not choose to use the content control features. A measure is effective when users who apply the control feature encounter less relevant content.
- 4.52 We expect providers to consider the effectiveness of the measures for all adult users, including those likely to be particularly affected by relevant content.
- 4.53 Monitoring the effectiveness of measures will help you keep your assessment up to date.

#### Review your assessment

- 4.54 You will need to keep your assessment up to date by reviewing your assessment at least annually.
- 4.55 A review involves checking that your latest assessment still accurately reflects the likelihood of adults encountering relevant content on your service. If there have been very few or minor changes to the design, operation or user base of your service since your last assessment, you may consider a limited review to be adequate.
- 4.56 Outside of annual reviews, the Act says that, before making any significant change to any aspect of a service's design or operation, the provider must carry out a further suitable and sufficient assessment relating to the impacts of that proposed change.
- 4.57 Further guidance on what constitutes a significant change is in section 7, 'Making a significant change to your service'.

### Additional requirements

- 4.58 You will have supplied Ofcom with a copy of your most recent assessment.<sup>45</sup>
- 4.59 You will have summarised the findings of your most recent assessment in your terms of service.<sup>46</sup>

### Essential records for Step 4

- 4.60 You will have made a written record of the annual review cycle for your assessment.

---

<sup>45</sup> Section 23(10) of the Act.

<sup>46</sup> This provision is from section 15(8) of the Act. See the Promoting Consistency and Accountability Through Terms of Service: Guidance for Providers of Category 1 Services for more detail on this duty.

# Part 3: Supporting documents

---

DRAFT FOR CONSULTATION

## 5. Evidence inputs

- 5.1 This part of the guidance focuses on the different types of evidence that providers should consider when assessing the likelihood of adult users encountering relevant content on their service.

### Why is evidence important?

---

- 5.2 The purpose of your assessment is to improve your understanding of how likely adults are to encounter relevant content on your service, and what measures you need to offer to adults to reduce their likelihood of encountering such content. The guiding principle when deciding what evidence to collect should be what will enable you to make an accurate assessment that meets the suitable and sufficient standard.
- 5.3 To be suitable and sufficient, your user empowerment assessment must include all the elements specified in section 14 of the Act. It should be specific to your service and accurately reflect the likelihood of adults encountering relevant content.
- 5.4 It is important that you understand the likelihood of adults encountering each kind of relevant content, as well as how the design and use of your service affect this. This means that your judgements should be based on relevant information and evidence.

### How should you decide what evidence is relevant?

---

- 5.5 We understand that the appropriate level of evidence will vary based on the nature of the service. You should use the core and any enhanced evidence inputs that you consider helpful for assessing and determining the incidence of relevant content on your service.
- 5.6 You should consider, for each kind of relevant content you have identified for assessment, all the core inputs and any other relevant information you already hold.
- 5.7 You should consider whether you have sufficient information to reach accurate conclusions on the level of likelihood for each kind of content at each stage of your analysis. If not, you should gather additional evidence from the list of enhanced inputs. We expect you to consider more than one of the enhanced evidence inputs as part of your analysis of your Category 1 service. Given categories of illegal content, content harmful to children and relevant content are closely related and the ways they appear on services are likely to be similar, we also recommend that you use at least the same enhanced inputs for this assessment as those applied in your illegal content risk assessment and, where applicable, your children's risk assessment, provided they are relevant.
- 5.8 Each kind of input is explained in the following paragraphs. While we expect the core and enhanced inputs to give providers a good understanding of the likelihood of adults encountering relevant content, the suggestions are not exhaustive. You should consider whether you need to use any further evidence.

### Evidence relating to users likely to be particularly affected by relevant content

- 5.9 For the purposes of the user empowerment assessment, we expect you to use the best available information about the users on your service. When considering user data, we

encourage you to familiarise yourself with the data protection legislation, and to consult the ICO's guidance on UK GDPR requirements.<sup>47</sup>

- 5.10 We consider that some users likely to be particularly affected by relevant content will be more likely to encounter such content.
- 5.11 Different kinds of evidence can give insights about the users likely to be particularly affected by relevant content, which will help you understand the likelihood of such users encountering this content.
- 5.12 There is evidence that certain groups of UK adult internet users are more likely to be particularly affected by specific types of relevant content; this includes users who are more likely to encounter such content, and users who might experience particular negative impacts from content (even if they might not be more likely than others to encounter it). See Appendix A1, where we have broken down this evidence for each category of relevant content.
- 5.13 It should be noted that some groups are more likely to be affected across all or multiple content types, including younger adults, women, people from minority ethnic groups, LGBTQ+ people, and people with mental health conditions.<sup>48</sup>
- 5.14 Providers often collect demographic data about users, for example, for advertising purposes or to improve users' experiences. Sometimes providers can also make inferences about demographic data based on user behaviour, for example, inferring age or gender from the kinds of videos users watch. When considering the use of personal information, providers must also consider privacy rights and comply with duties under the ICO guidance on UK GDPR requirements.<sup>49</sup>

## What is a core input?

- 5.15 We expect you to use all the core evidence inputs to complete your assessment.
- 5.16 You should also consider any information you already hold, including past assessments, that may be relevant to your assessment. **Table 3** includes examples of core inputs.
- 5.17 Failing to consider all core inputs may mean your assessment is not suitable and sufficient.

---

<sup>47</sup> ICO. [UK GDPR Guidance and Resources](#). [accessed 19 June 2026].

<sup>48</sup> Evidence about who is more likely to encounter and be negatively impacted by relevant content is included in Ofcom's [Illegal Harms Register](#) and [Children's Register](#). Further evidence included here relates to more tailored, recent and/or up-to-date evidence about which adult users are more likely to be affected by relevant content.

<sup>49</sup> ICO. UK GDPR Guidance and Resources.

**Table 3: Core evidence inputs**

Core inputs	Explanation
<p><b>User complaints, including user reports</b></p>	<p>You should consider any data from complaints and reports about relevant content when considering your assessment for the purpose of the user empowerment duties.</p> <p>Evidence gathered from this input could include, for example, the kinds of relevant content being complained about, any relevant data on the adults making these complaints if this is available to you, and the accuracy of complaints.</p> <p>This input should help you understand the frequency of relevant content on your service, which will help you assess the likelihood of adults encountering relevant content on your service.</p>
<p><b>User data</b></p>	<p>By user data, we mean data that you hold that has been provided by users, including their personal data and user data that you have created, compiled or obtained (e.g., data relating to when or where users access the service or how they use it). You may already hold this data, for example, for analysis via behaviour identification or user profiling technologies.</p> <p>Providers have a duty to consider the likelihood of adults with a certain characteristic or who are members of a certain group encountering relevant content which particularly affects them. Certain content can disproportionately affect certain demographic groups (e.g., adults with mental health conditions are more likely to encounter content promoting suicide, self-harm or eating disorders).<sup>50</sup> Considering user data will help you understand which groups are more likely to encounter relevant content.</p> <p>We encourage you to consult the ICO’s UK GDPR guidance.<sup>51</sup></p>
<p><b>Retrospective analysis of incidents that lead to an increase in relevant content</b></p>	<p>Following any significant incidents that lead to an increase in relevant content experienced on your service, you should undertake retrospective analysis. This information should inform your assessment. A significant incident could include, for example, a prominent trend featuring relevant content or an individual piece of relevant content which becomes widely disseminated.</p> <p>Retrospective analyses will help you assess the likelihood of adults encountering such content on your service and obtain any data relating to users likely to be particularly affected by this content.</p> <p>Such case studies may allow you to understand how particular aspects of your service’s design (such as functionalities and user characteristics) may have played a role and where the measures you offer and associated processes could have been more effective.</p>

<sup>50</sup> As per evidence in Appendix A1 paragraph A1.3.

<sup>51</sup> ICO. UK GDPR guidance and resources. [accessed 19 June 2026].

Core inputs	Explanation
<p><b>Ofcom’s draft Guidance on Relevant Content, and the relevant sections of Ofcom’s Illegal Harms Register, Children’s Register, and Illegal Content and Children’s Risk Profiles</b></p>	<p>You should review Ofcom’s draft Guidance on Relevant Content to help you identify the content in scope of your assessment.</p> <p>We encourage you to consult the relevant sections of the Illegal Harms Register and Children’s Register. Categories of illegal content, content harmful to children and relevant content are closely related and the ways they manifest on services are likely to be similar. The evidence in both of the registers of risk is broad and considers legal content and adults.</p> <p>You may also find it useful to consult the Illegal Content and Children’s Risk Profiles to help you understand which functionalities and characteristics of your service affect the likelihood of users encountering relevant content.</p> <p>We consider that these documents will support you in assessing which functionalities your service has that might affect the likelihood of adults encountering relevant content.</p>
<p><b>Relevant findings of your illegal content risk assessment and, where your service is in scope, your children’s risk assessment</b></p>	<p>All providers of Category 1 services will also have to complete an illegal content risk assessment. We expect that some Category 1 services will also be in scope of the children’s risk assessment duties. The findings of these assessments should include an assessment of the features, functionalities, user base and characteristics of the service, which must all be assessed as part of the user empowerment assessment.</p> <p>As above, we expect certain categories of illegal content and content harmful to children to manifest in similar ways to content relevant to the user empowerment duties. Therefore, elements of these assessments will likely be relevant to your user empowerment assessment.</p>
<p><b>Evidence drawn from existing controls</b></p>	<p>If you already have existing controls on your service, then you may want to consider how these impact the likelihood of adults encountering relevant content. You should use evidence drawn from these processes which demonstrates how the controls reduce the likelihood of adults encountering relevant content.</p> <p>For example, you may already offer adults tools that give them control over encountering relevant content and be able to demonstrate these tools are effective in reducing their likelihood of encountering relevant content. Including this evidence input in your assessment will help you understand the likelihood of adults encountering relevant content on your service, the effectiveness of your control measures, and the effect of different characteristics of your service on likelihood levels.</p>
<p><b>Results of content moderation systems</b></p>	<p>To improve your understanding of the likelihood of adults encountering relevant content, you should consider analysis insights from the content moderation system.</p> <p>This kind of input is particularly relevant to understanding the incidence of relevant content and how the design and operation of the service may affect the likelihood of adult users encountering relevant content.</p>

Core inputs	Explanation
<p><b>Other relevant information</b></p>	<p>Consider if you already have the enhanced inputs in <b>Table 4</b> to support your assessment. This may include any existing reporting, published research, referrals you have made to law enforcement, reports provided to you by expert groups or by law enforcement agencies, data on user behaviour relating to relevant content, or the outcomes of product testing. You may also consider other assessments you have already conducted to meet other regulatory obligations such as the Digital Services Act (EU) or to comply with privacy and data protection laws in the UK. In addition, providers may have evidence or data about specific features and functionalities.<sup>52</sup> We would expect the availability of this information to be considered when assessing them.</p> <p>Any other information you hold that can support your assessment. You may want to also consider additional enhanced inputs.</p>

## What is an enhanced input?

- 5.18 As a provider of a Category 1 service, we expect that you should also use more than one enhanced evidence input. You should use as many of the enhanced inputs as you need to provide you with a clear and detailed understanding of the likelihood of adults encountering each type of relevant content on your service.
- 5.19 We advise that you consider at least the same enhanced inputs that you have used as evidence in your illegal content risk assessment and, if you are in scope, in your children's risk assessment.
- 5.20 We provide descriptions of the different types of enhanced inputs in **Table 4** to help you decide if an input is relevant to your assessment.

---

<sup>52</sup> For example, from product testing them, optimising the design of the service, or running A/B tests to understand their adoption.

**Table 4: Enhanced evidence inputs**

Enhanced inputs	Explanation
<p><b>Results of product testing</b></p>	<p>To improve your understanding of the likelihood of adults encountering relevant content on your service, you may consider running tests on individual products ahead of launching them on your wider services to understand how users behave and engage with the products and the potential impacts. Evaluating data and insights gathered from these tests may improve your assessment, because testing can indicate the potential effect of any product changes and help determine whether the effect may increase or decrease the likelihood of adults encountering relevant content on your service.</p> <p>This kind of input is particularly relevant for providers carrying out a new assessment relating to a proposed significant change to the service. It is likely to be particularly appropriate where you are launching new features that have not been widely deployed before.</p> <p>For example, providers running on-platform tests<sup>53</sup> of their recommender systems should include any additional safety metrics (such as prevalence) they gather as part of this routine testing to provide insights as to how frequent design adjustment may increase the incidence of relevant content on the service.</p>
<p><b>Consultation with internal experts</b></p>	<p>To improve your understanding of how adults encounter relevant content on your service, or technical measures that reduce their likelihood of encountering such content, you should consult with experts that have specific knowledge and expertise relating to relevant content.</p> <p>Consultation should happen regularly, and records of the engagement should feed into the annual assessment, or you can bring experts into the four-step process while the assessment is underway to provide formal and targeted input.</p>
<p><b>Views of independent experts</b></p>	<p>This is likely to be valuable when considering complex topics, such as assessing the likelihood of adults with certain characteristics or who are members of a certain group encountering relevant content which particularly affects them.</p> <p>You should take steps to ensure the quality and accuracy of any third-party advice.</p> <p>You may also want to consult experts on industry trends, regulatory standards and the views of certain trade bodies or technical experts in relevant fields.</p>

---

<sup>53</sup> By ‘on-platform testing of recommender algorithms’ we mean the process of testing two or more variants of recommender system before proceeding with the design change. This could include but is not limited to A/B/x testing or multi-arm bandit (MAB) testing.

Enhanced inputs	Explanation
<p><b>Internal and external commissioned research</b></p>	<p>If you are seeking to access additional expert resources and expertise to incorporate into your assessment, you may commission internal and/or external research. For instance, research could focus on specific trends, categories of content, or user groups.</p> <p>Expert research would allow you to improve your understanding of the factors which may increase the likelihood of adults encountering relevant content, including users likely to be particularly affected by such content, behavioural considerations and how the tools offered to adults can effectively reduce their likelihood of encountering relevant content.</p>
<p><b>Consultation with users and user research</b></p>	<p>To improve your understanding of the likelihood of adults, including those likely to be particularly affected, encountering relevant content, you may engage in consultation with users or carry out other forms of user research. You can choose the method and frequency of consultation and how you wish to undertake this engagement with users – this could include a platform-wide initiative which gives adults an opportunity to give feedback on aspects of the service, or more targeted consultation with a specific group on specific issues which the platform has reason to believe will affect them. Alternatively, you may wish to contract external agencies to deliver qualitative research, or other studies, and obtain objective user feedback.</p>
<p><b>Results of engagement with relevant representative groups</b></p>	<p>You may choose to engage with relevant representative groups to improve your understanding of the likelihood of adults encountering relevant content on your service, including specific groups of adults likely to be particularly affected by such content.</p> <p>To do this, you may reach out to organisations representing specific groups to help give these groups a channel through which they can directly feedback any concerns.</p>

## 6. Likelihood Level Table

- 6.1 This part presents a Likelihood Level Table (Table 5) to use as part of Step 2 in your assessment process. Using this table should help you to classify the likelihood level into high likelihood, medium likelihood, low likelihood and negligible likelihood for each of the categories of relevant content. Calibrating likelihood levels should be based on all the evidence you have gathered to conduct your assessment.
- 6.2 You should not apply the Likelihood Level Table mechanically. It is intended to help inform your assessment of a likelihood level, rather than to determine likelihood levels. However, if you have evidence of a significant amount of a category of relevant content on your service, then we would generally expect you to assess as high likelihood for that kind of content.
- 6.3 Where the evidence is not conclusive regarding the appropriate level of likelihood, we expect providers to err on the side of caution and select the higher likelihood level.

**Table 5: Likelihood Level Table**

Likelihood level	Description	Your service may decide on this likelihood level if some of the following conditions are met
<b>High likelihood</b>	You assess there is a high likelihood that an adult encounters relevant content on your service.	<p>These conditions are likely to be met if:</p> <p>There is significant evidence of relevant content being encountered on your service (e.g., from your assessment of incidence and user reports and complaints) or it being very likely to be encountered on your service (e.g., evidence from external experts); or</p> <p>Your service has many functionalities or characteristics that significantly increase the likelihood of relevant content occurring and there are no effective systems and processes in place to address this content nor other factors which reduce risk to adult users;<sup>54</sup> or</p> <p>Your service does not prohibit this kind of content* and there are no or few systems and processes in place to effectively reduce the likelihood of adults encountering this content.</p>

---

<sup>54</sup> We consider ‘many’ to be a large number of functionalities or characteristics in proportion to the total number of specific functionalities or characteristics for a particular kind of relevant content. A kind of relevant content which involves many different pathways may have more evidence available, and in turn more characteristics associated with it. Similar considerations apply to ‘several’ and ‘few’ for the likelihood levels in the rest of the table.

Likelihood level	Description	Your service may decide on this likelihood level if some of the following conditions are met
<b>Medium likelihood</b>	You assess there is a moderate likelihood that an adult could encounter relevant content on your service.	<p>These conditions are likely to be met if:</p> <p>There is moderate evidence of relevant content being encountered on your service; or</p> <p>You have identified several functionalities or characteristics of your service which increase the likelihood of adults encountering relevant content, and while you may have some systems and processes in place to address this content, you cannot demonstrate they are effective at reducing the likelihood of adult users encountering this content, nor are there existing controls and/or aspects of your service’s design or operation that sufficiently reduce the likelihood of adult users encountering this content;<sup>55</sup> or</p> <p>Your service does not prohibit this kind of content* and there are some systems and processes in place to address this content, but you cannot demonstrate that they sufficiently reduce the likelihood of adult users encountering relevant content.</p>
<b>Low likelihood</b>	You assess that there is a low likelihood that an adult would encounter relevant content on your service.	<p>These conditions are likely to be met if:</p> <p>You have used evidence to assess whether adults could encounter this kind of content by means of your service and have concluded that there is little evidence of this, and you have identified no or few specific functionalities or characteristics that are associated with an increase in the likelihood of adults encountering relevant content; or</p> <p>There are comprehensive systems and processes in place, or other factors which sufficiently reduce the likelihood of adult users encountering this kind of content and your evidence shows they are very effective (e.g., all content is pre-moderated). Even if you are taking all relevant measures in Ofcom’s User Empowerment measures in the Additional Duties Code this may not always be sufficient to mean your service is low likelihood.</p>
<b>Negligible or no likelihood</b>	If your evidence shows it is not possible or extremely unlikely that adults could encounter relevant content by means of your service, you may assess the likelihood of encountering this content as ‘negligible’. You will need comprehensive evidence to demonstrate that adults do not have a low, medium or high likelihood of encountering relevant content on your service.	

<sup>55</sup> This is intended as an overall guide, but rather than focusing purely on the number of functionalities or characteristics, you should consider their combined effect to make an overall judgement about the level of risk on your service.

Likelihood level	Description	Your service may decide on this likelihood level if some of the following conditions are met
<p><b>* A provider that prohibits a category of relevant content may still assess their service to have a high, medium or low likelihood of adults encountering that content, depending on the assessment of relevant evidence and factors as set out in this guidance.</b></p> <p><b>Providers are still required to assess the evidence and risk factors described in the guidance to understand how their service operates in practice even if they prohibit relevant content. Only after completing the assessment can the provider determine the actual likelihood level of relevant content on the service. In the event that relevant content appears despite being prohibited on the service, the provider would be expected to take appropriate action in line with their terms of service duties and user empowerment duties.</b></p>		

DRAFT FOR CONSULTATION

# 7. Making a significant change to your service

- 7.1 This part of the guidance explains the circumstances which could amount to a significant change to your service where you may need to carry out a new assessment relating to that proposed change.

## Carry out a new assessment before making a significant change to your service

---

- 7.2 If you plan to make a significant change to your service, you must carry out a new assessment before making the change. This applies to a change to any aspect of the service design or operation which is reasonably likely to have a significant impact on the likelihood of adults encountering relevant content. You should therefore carefully consider proposed changes to your service in advance of putting them into operation.
- 7.3 You are required to carry out a new assessment as it relates to the impacts of the proposed change. To ensure your assessment is suitable and sufficient, you should consider whether the impact of the change may affect other parts of the service and undertake the assessment accordingly.
- 7.4 In **Table 6**, we have provided guidance on what could amount to a significant change by listing a few indicative scenarios that are likely to fall into this category.

**Table 6: Guidance on significant change**

Type of change	Guidance	Outcome
<p><b>Likely to amount to a significant change if any of the following apply</b></p>	<p>Your proposed change is likely to amount to a significant change if any of the following apply:</p> <ul style="list-style-type: none"> <li>• The proposed change alters the factors affecting likelihood that you identified in your last assessment.</li> <li>• The proposed change materially impacts a substantial proportion of your user base or changes the kind of users you expect to see on your service.</li> <li>• The proposed change materially impacts a vulnerable user group, such as adults with certain characteristics.</li> <li>• The proposed change materially impacts the efficacy of the measures you offer to adult users.</li> <li>• The proposed change materially impacts your revenue model, growth strategy and/or ownership in a way that affects its service design.</li> </ul> <p>When considering these statements, you should consider if any of the following apply to the proposed change:</p> <ul style="list-style-type: none"> <li>• Would the change materially impact users, user experience or user behaviour in a way that may affect the likelihood of adults encountering relevant content?</li> <li>• Does the change affect the ability or incentives of users to create or share relevant content on your service?</li> <li>• Will the change affect user reporting abilities?</li> <li>• Does the change include new functionalities or enable users to interact differently?</li> <li>• Does it include changes that would affect content or network recommendations on your service?</li> <li>• Does the change involve a new or different content moderation process?</li> <li>• Does it include changes to your business model in terms of how you generate revenue or your growth strategy?</li> </ul>	<p>If yes, you must carry out a new assessment relating to this change</p>

7.5 Examples of the types of design and operational changes which are likely to amount to significant change include, but are not limited to, the following:

- significant updates to the design of user-facing algorithms or systems and processes, for example, changing the operation of the recommendation system(s). Key examples include:
  - introduction of a new recommender system,

- introduction of a new machine-learning model within the existing recommender system,
- changing the 'goal criteria' of recommender systems, or
- new insights from on-platform testing;
- adding or removing functionalities;
- changes to platform content rules or content prioritisation in relation to the different categories of relevant content;
- updates to the design of user-facing functionalities and features;
- introducing the use of prompts;
- any new acquisition that may change the core product offered to users;
- changes in ownership or investment;
- changes in the revenue models;
- changes in the service's growth strategy; or
- changes in capacity (in terms of number of employees).

DRAFT FOR CONSULTATION

# A1. Appendix A: Evidence relating to which users are likely to be affected by each category of relevant content

A1.1 A1.1 As explained at paragraphs 5.9-5.14, there is evidence that certain groups of UK adult internet users are more likely to be particularly affected by specific types of relevant content. This includes users who are more likely to encounter such content, and users who might experience particular negative impacts from content (even if they might not be more likely than others to encounter it). We have broken down this evidence for each category of relevant content.

## A1.2 **Suicide and self-harm content:**

- There is evidence that this content can have negative impacts on mental health, and be linked to acts of suicide and self-harm – with examples of this shared by adults who participated in Ofcom’s 2026 research on experiences of this content, along with a range of other evidence sources.<sup>56</sup>
- Suicide and self-harm content is more likely to affect adults with mental health challenges (such as depression)<sup>57</sup> and younger adults, with evidence suggesting those aged 34 and under can be twice as likely to encounter this content compared to adults in general.<sup>58</sup>

---

<sup>56</sup> See Ofcom’s Illegal Harms Register and Children’s Register; Ofcom, 2026. [Exploring adult internet users’ engagement with suicide, self-harm and eating disorder content.](#)

<sup>57</sup> The Online Experiences Tracker (OET), a study of potential online harms encountered by UK internet users, found that adults aged 18+ were twice as likely to have encountered content promoting suicide and/or self-harm (SSH content) during the previous four weeks if they had a mental health condition (7% of respondents with mental health conditions, compared to 3% of adult users without limiting or impacting conditions). Source: Ofcom, 2026. [OET, Wave 9](#); The SPARK survey, a study looking at suicide-related experiences among UK adults aged 16+, found that while one in eight (12%) UK adults had encountered content promoting SSH content in the past year, this rose to one in five (21%) among those who have needed support with mental health issues during this time, and one in six (17%) among internet users who said they had ever thought about dying by suicide. The survey showed that adults who have self-harmed are more likely to have encountered content promoting self-harm than adults as a whole (15% versus 9%). Source: MEL Research, 2025. [SPARK report](#), Autumn 2025 Wave. Subsequent references to these sources throughout.

<sup>58</sup> The OET found that one in ten (11%) adults aged 18-34 had encountered SSH content during the previous four weeks compared to 1 in 20 of adults from all age groups (5%). The SPARK survey found one in three (33%) adults aged 16-24, and one in five (21%) aged 25-34 had encountered SSH content during the past year, compared to one in eight (12%) of all adults aged 16+. Other evidence has shown that people aged 16-34 are also more likely to report suicidal thoughts and self-harm than other age groups. Source: NHS England, 2025. [Adult Psychiatric Morbidity Survey: Survey of Mental Health and Wellbeing, England, 2023/4, Chapter 4: Suicidal thoughts, suicide attempts and non-suicidal self-harm.](#) [accessed 30 March 2026].

- This content is also more likely to affect adults who are LGBTQ+<sup>59</sup> and adults from minority ethnic groups.<sup>60</sup> There is also evidence that adults who face unique risks in relation to suicide and self-harm include those with experience of living in care, of gambling harms, of homelessness and of domestic abuse. These adults have an elevated risk of experiencing suicide or self-harm, and could also be more likely to be affected.<sup>61</sup>

### A1.3 Eating disorder content:

- As with suicide and self-harm content, there is evidence that eating disorder content, including some content associated with recovery, can encourage behaviours associated with eating disorders,<sup>62</sup> meaning that adults with an elevated risk of eating disorder behaviours who encounter such content are also more likely to be affected.<sup>63</sup>
- Eating disorder content can have a greater impact on younger adults,<sup>64</sup> women,<sup>65</sup> LGBTQ+ people,<sup>66</sup> and individuals with mental health challenges: Ofcom's Online Experiences Tracker found that 28% of adults with mental health conditions had

---

<sup>59</sup> A study of coroner inquest data found that those identifying as LGBT were 2.3 times more likely to have a suicide-related online experience. Suicide-related online experience included: searching the internet for information on suicide method, visiting websites that may have encouraged suicide behaviour, communicating suicidal ideation or intent online, and being bullied online. Source: Rodway, C. et al., 2023. [Online harms? Suicide-related online experience: a UK-wide case series study of young people who die by suicide](#). *Psychological Medicine*, 53 (10). [accessed 30 March 2026]; Wave 9 of the OET found higher levels of exposure to SSH content for lesbian, gay and bisexual adults compared to other internet users (9%, compared to 4% of heterosexual respondents), and aggregated analysis of Waves 4-9 found that 16% of non-binary respondents had encountered SSH content; The SPARK survey showed that bisexual respondents were more likely (at 19%) to have encountered SSH content in the last year compared to the population as a whole (12%).

<sup>60</sup> The SPARK survey showed that respondents from minority ethnic groups were more likely (at 31%) to have encountered SSH content in the last year compared to the population as a whole (12%).

<sup>61</sup> Sources: Göbbels-Koch, P., 2023. [The range of suicidal ideation among people with care experience: Occurrences of suicidal thoughts in a cross-national sample from England and Germany](#), *Children and Young Youth Services Review*, 150. [accessed 19 June 2026]; Bhavsar, V. and Dheensa, S., 2025. [The impact of domestic abuse on suicide](#), *Lancet Regional Health: Europe*, 55 (101376). [accessed 30 March 2026]; The SPARK survey showed that respondents with experience of living in care and serving in the armed forces were more likely (at 47% and 23%) to have encountered SSH content in the last year compared to the population as a whole (12%); GambleAware (David, M. et al.), 2026. [Exploring the relationship between gambling behaviour, suicidality, and treatment and support](#). [accessed 19 June 2026].

<sup>62</sup> See Ofcom's Illegal Harms Register and Children's Register; Ofcom, 2026. Exploring adult internet users' engagement with suicide, self-harm and eating disorder content.

<sup>63</sup> For example, evidence about patients with eating disorders shows they are significantly more likely to have experienced adverse childhood experiences, including forms of neglect and maltreatment. Sources: Rienecke, R. et al., 2022. [Adverse childhood experiences among adults with eating disorders: comparison to a nationally representative sample and identification of trauma profiles](#), *Journal of Eating Disorders*, 10 (72). [accessed 19 June 2026].; Beat, 2023. [Online Safety and Eating Disorders](#). [accessed 19 June 2026].

<sup>64</sup> The OET found that nearly two in five (37%) adults aged 18-24 and one in four (27%) adults aged 25-34 had encountered eating disorder-related content during the previous four weeks compared to under one in five adults from all age groups (17%). Eating disorder-related content was defined as content that does one or more of the following: shames or stigmatizes certain body types (e.g., body size, shape or features), promotes excessive or unhealthy dieting or exercise, or is related to eating disorders.

<sup>65</sup> The OET found that women were significantly more likely than men to encounter eating disorder-related content (19% vs 15%).

<sup>66</sup> The OET found that LGB+ people were significantly more likely than adults as a whole to encounter eating disorder-related content (30% vs 17%), as were non-binary people (47% based on aggregated analysis of Wave 4-9 data).

encountered eating disorder-related content during the previous 4 weeks, compared to 17% among adults in general.<sup>67</sup>

#### **A1.4 Hate and abuse content:**

- In the UK, abusive or hateful content is more likely to target women, people from ethnic minority or migrant backgrounds, people from non-Christian religious groups, people with disabilities, and LGBTQ+ people.<sup>68</sup>
- There is also evidence suggesting that people whose identity or community is targeted in hateful content are more likely than others to encounter it. Ofcom 2026 research into experiences of content perceived as hateful found that during the previous year, UK adults were more likely to encounter hateful content if they shared an identity with the group being targeted in the content, and were often more likely to see online hate in general.<sup>69</sup>
- This also suggests that users with multiple protected characteristics or identities targeted by hate are often even more likely to be affected. In addition, users with health conditions and younger adults (aged 35 and under) are more likely to encounter hateful content.<sup>70</sup>
- There is also evidence that high-profile internet users are more likely to be targeted with abuse, for example, major public figures such as politicians and celebrities, people working in local government, or victims or survivors of harms that have been reported on in the media.<sup>71</sup>

---

<sup>67</sup> OET, Wave 9.

<sup>68</sup> The OET asked respondents who had experienced bullying, abusive behaviour, threats or hate speech about the group or characteristic the content was directed towards. Among adults who reported experiencing this type of content, the most commonly reported targets were: ethnicity (reported by 48% of adults experiencing this content), a religious group (37%), trans people (35%), asylum seekers (30%), sexual orientation (25%), and women and girls (24%); Ofcom research into experiences of content perceived as hateful found that during the previous year the proportion of UK adult internet users encountering online hate against the following groups was as follows: 65% saw hate targeting asylum seekers, 61% targeting people born outside the UK, 58% targeting minority ethnic groups, 56% targeting religious minorities, 54% targeting transgender people, 52% targeting non-binary people, 52% targeting LGBTQ+ people, 44% targeting people with disabilities, and 43% targeting cultural minorities. [Source: Ofcom, 2026. Experiences of content perceived as hateful.](#)

<sup>69</sup> For example, 69% of adult internet users from minority ethnic groups had seen hate targeting people from minority ethnic groups in the last year, compared to 57% among other respondents, and 85% of respondents from minority ethnic groups had seen any kind of online hate in the previous year, compared to 76% of other respondents). [Source: Ofcom, 2026. Experiences of content perceived as hateful.](#)

<sup>70</sup> In the OET, respondents with mental health conditions (40%) and any limiting or impacting condition (33%) were more likely to see hateful, offensive or discriminatory content within a four-week period than the population as a whole (26%) and those without limiting or impacting conditions (22%). In research on content perceived as hateful, 90% of 18-24-year-olds and 84% of 25-34-year-olds had encountered online hate in the past year, compared to 71% of users aged 55+. [Source: Ofcom, 2026. Experiences of content perceived as hateful.](#)

<sup>71</sup> Ofcom, 2025. [Experiences of online hate and abuse among women in politics](#); Ofcom, 2025. [Online hate and abuse in sport](#); Local Government Association, 2025. [Debate Not Hate: Survey of councillors, May-June 2025](#). [accessed 19 June 2026]; Survivors Against Terror, 2025. [Communications, Intrusions and Accusations: Terror Survivors' Experiences on Social Media](#). [accessed 30 March 2026].

# A2. Appendix B: Comparison of children’s and illegal content risk assessment duties

A2.1 For user-to-user services, the illegal content risk assessment duties can be found in section 9 of the Act, children’s risk assessment duties can be found in section 11 of the Act, and the user empowerment assessment duties can be found in section 14 of the Act.

**Table 7: Comparison with children’s and illegal content risk assessment duties**

<b>User empowerment assessment duties</b> <b>Section 14 (user-to-user services)</b>	<b>Illegal content risk assessment duties</b> <b>Section 9 (user-to-user services)</b>	<b>Children’s risk assessment duties</b> <b>Section 11 (user-to-user services)</b>
<p>(1) This section sets out the duties about assessments related to adult user empowerment which apply in relation to Category 1 services (in addition to the duties about risk assessments set out in section 9 and, in the case of Category 1 services likely to be accessed by children, section 11).</p>	<p>(1) This section sets out the duties about risk assessments which apply in relation to all regulated user-to-user services.</p>	<p>(1) This section sets out the duties about risk assessments which apply in relation to regulated user-to-user services that are likely to be accessed by children (in addition to the duties about risk assessments set out in section 9 and, in the case of services likely to be accessed by children which are Category 1 services, the duties about assessments set out in section 14).</p>
<p>(2) A duty to carry out a suitable and sufficient assessment for the purposes of section 15(2) at a time set out in, or as provided by, Schedule 3.</p>	<p>(2) A duty to carry out a suitable and sufficient illegal content risk assessment at a time set out in, or as provided by, Schedule 3.</p>	<p>(2) A duty to carry out a suitable and sufficient children’s risk assessment at a time set out in, or as provided by, Schedule 3.</p>
<p>(3) A duty to take appropriate steps to keep such an assessment up to date.</p>	<p>(3) A duty to take appropriate steps to keep an illegal content risk assessment up to date, including when Ofcom make any significant change to a risk profile that relates to services of the kind in question.</p>	<p>(3) A duty to take appropriate steps to keep a children’s risk assessment up to date, including when Ofcom make any significant change to a risk profile that relates to services of the kind in question.</p>

<p>(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient assessment for the purposes of section 15(2) relating to the impacts of that proposed change.</p>	<p>(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient illegal content risk assessment relating to the impacts of that proposed change.</p>	<p>(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient children’s risk assessment relating to the impacts of that proposed change.</p>
		<p>(5) Where a children’s risk assessment of a service identifies the presence of non-designated content that is harmful to children, a duty to notify Ofcom of –  (a) the kinds of such content identified, and (b) the incidence of those kinds of content on the service.</p>
<p>(5) An assessment of a service ‘for the purposes of section 15(2)’ means an assessment of the following matters –</p>	<p>(5) An ‘illegal content risk assessment’ of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind –</p>	<p>(6) A ‘children’s risk assessment’ of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind –</p>
<p>(a) the user base</p>	<p>(a) the user base</p>	<p>(a) the user base, including the number of users who are children in different age groups</p>
<p>(b) the incidence of relevant content on the service</p>	<p>(b) the level of risk of individuals who are users of the service encountering the following by means of the service – (i) each kind of priority illegal content (with each kind separately assessed); and (ii) other illegal content, taking into account (in particular) algorithms used by the service, and how easily, quickly and widely content may be disseminated by means of the service</p>	<p>(b) the level of risk of children who are users of the service encountering the following by means of the service – (i) each kind of primary priority content that is harmful to children (with each kind separately assessed); (ii) each kind of priority content that is harmful to children (with each kind separately assessed); and (iii) non-designated content that is harmful to children, giving separate</p>

		consideration to children in different age groups, and taking into account (in particular) algorithms used by the service and how easily, quickly and widely content may be disseminated by means of the service
record(c) the likelihood of adult users of the service encountering, by means of the service, each kind of relevant content (with each kind separately assessed), taking into account (in particular) algorithms used by the service, and how easily, quickly and widely content may be disseminated by means of the service	(c) the level of risk of the service being used for the commission or facilitation of a priority offence	(c) the level of risk of harm to children presented by different kinds of content that is harmful to children, giving separate consideration to children in different age groups
(d) the likelihood of adult users with a certain characteristic or who are members of a certain group encountering relevant content which particularly affects them	(d) the level of risk of harm to individuals presented by illegal content of different kinds or by the use of the service for the commission or facilitation of a priority offence	(d) the level of risk of harm to children presented by content that is harmful to children which particularly affects individuals with a certain characteristic or members of a certain group
(e) the likelihood of functionalities of the service facilitating the presence or dissemination of relevant content, identifying and assessing those functionalities more likely to do so	(e) the level of risk of functionalities of the service facilitating the presence or dissemination of illegal content or the use of the service for the commission or facilitation of a priority offence, identifying and assessing those functionalities that present higher levels of risk	(e) the extent to which the design of the service, in particular its functionalities, affects the level of risk of harm that might be suffered by children, identifying and assessing those functionalities that present higher levels of risk, including functionalities – (i) enabling adults to search for other users of the service (including children), or (ii) enabling adults to contact other users (including children) by means of the service

(f) the different ways in which the service is used, and the impact of such use on the likelihood of adult users encountering relevant content

(f) the different ways in which the service is used, and the impact of such use on the level of risk of harm that might be suffered by individuals

(f) the different ways in which the service is used, including functionalities or other features of the service that affect how much children use the service (e.g., a feature that enables content to play automatically), and the impact of such use on the level of risk of harm that might be suffered by children

(g) the nature, and severity, of the harm that might be suffered by individuals from the matters identified in accordance with paragraphs (b)-(f)

(g) the nature, and severity, of the harm that might be suffered by children from the matters identified in accordance with paragraphs (b)-(f), giving separate consideration to children in different age groups

(g) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to strengthen adult users' control over their interaction with user-generated content, and other systems and processes) may reduce or increase the likelihood of adult users encountering relevant content.

(h) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.

(h) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.

(6) In this section 'relevant content' means content to which section 15(2) applies (content to which user empowerment duties set out in that provision apply).

(6) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to individuals presented by illegal content.

(7) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to children presented by content that is harmful to children.