

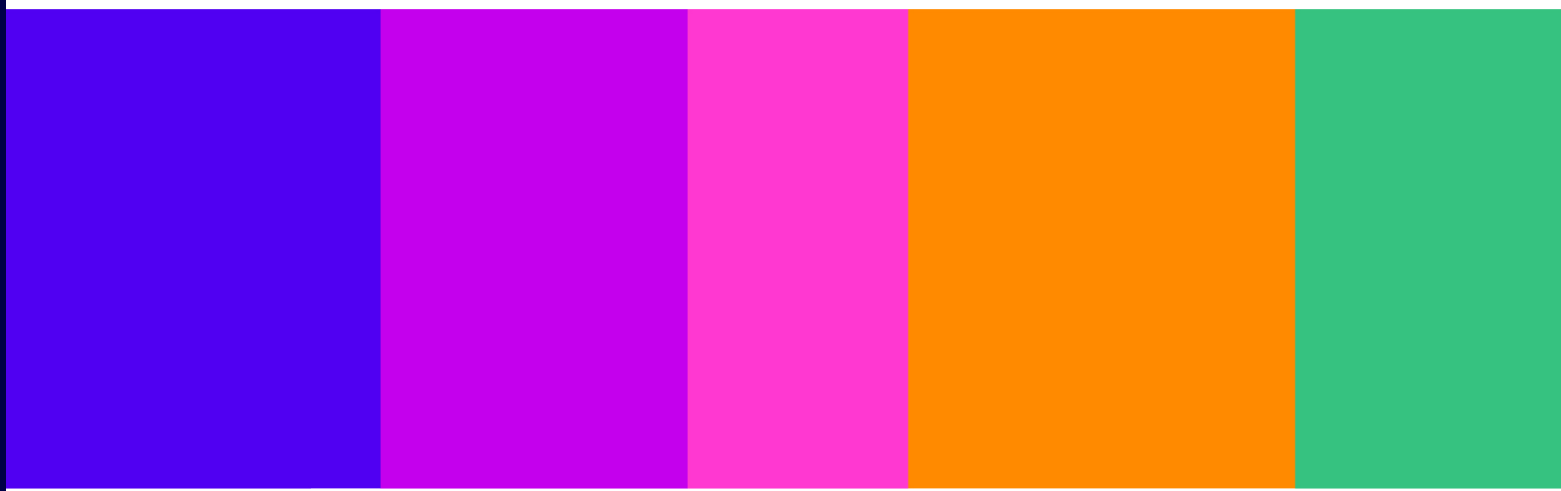
# Implementing the Online Safety Act: progress update

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[Welsh translation available](#)

## Document

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# Contents

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## Section

Progress since the Online Safety Act became law .....	3
Updated roadmap.....	14

# Progress since the Online Safety Act became law

This document provides an update on our work in the twelve months since the Online Safety Act (“the Act”) received Royal Assent in October 2023. It explains what service providers will need to do in the next phase of implementation of the Act, with the new rules starting to come into force from December 2024.

Our mission is to make life safer online in the UK, especially for children. Our role is to ensure that services have the appropriate systems and processes to protect people from harm. We moved swiftly to begin implementing the Act immediately after it passed, launching our consultation on [illegal harms online](#) in November 2023, followed in December 2023 by [draft guidance for online pornography services](#) on how they should use highly effective age assurance so that children are not normally able to encounter pornographic material. In May 2024, we [published proposals](#) for how services should approach their new duties relating to content that is harmful to children.

As the new rules come into force, online services that host user-generated content, search services and pornography services available to people in the UK will need to act. We expect to see:

- All in-scope services prioritising user safety, tackling risks to users and designating named senior accountable people. A core objective of the Act is to ensure services are safe by design, i.e. that firms embed safety considerations in the very design of their services as they take decisions on new products, features, and commercial strategies.
- Children better protected online, with services having to introduce robust age-checks to prevent children seeing content such as suicide, self-harm material and pornography, and to filter or downrank harmful material in recommended content.
- The sharing of child sexual abuse material becoming more difficult, and children shielded from contact from adults they don't already know.
- Illegal content – including illegal hate speech, terrorist content and content that encourages or facilitates suicide – taken down quickly once services are aware of it.
- Women and girls better protected from misogyny, harassment, and abuse online.
- More effective action on fraud.

Over time, the new rules will also empower users to have more control over their online experience and increase transparency in what services are doing to keep users safe.

A new phase begins later this year. In December, we expect to publish the first edition of the Illegal Harms Codes of Practice and illegal content risk assessment guidance. At that time, all providers of services in scope of the Act must take action to assess the risks of illegal content appearing on their service. Their assessments must be suitable and sufficient to identify all the risks they face and be completed by mid-March 2025. We will expect specific services to disclose their risk assessments to us from 31 March 2025.

Following the planned publication of our children's access assessment guidance in January 2025, all in-scope service providers will have three months to assess whether their service is likely to be accessed by children, therefore by April 2025. Services likely to be accessed by children must then carry out a children's risk assessment within three months of us publishing our Protection of Children Codes of Practice and risk assessment guidance in April 2025. Those services should prepare to complete their children's risk assessments by July 2025, and we will expect specific services to disclose their children's risk assessments to us from 31 July 2025.

Once the Codes of Practice have passed through Parliament, service providers will need to take the steps laid down in the Codes or use other effective measures to protect users.

We expect service providers to comply, and we are ready to launch immediate enforcement action if providers do not act promptly to address the risks posed by their services. We are already working with a small number of particularly critical services to assess and improve their safety measures, targeting risky as well as large services.

In line with our commitment to build on and iterate the Codes over time, we will launch a new consultation in spring 2025 on some further specific measures building on our first Codes. We will also bring forward draft guidance to regulated services on protecting women and girls in February 2025.

We have been clear that service providers don't need to wait to identify and address harms that exist on their services. Where user protections are insufficient to address the risks they face, there is no good reason to delay making changes in the interests of user safety.

The final phase of implementing the Act concerns the duties on categorised services. We sent the then-Secretary of State [our advice](#) on 29 February 2024. The next stage is for Government to confirm the thresholds for categorisation in secondary legislation, which we expect to take place by the end of 2024. We have also rephased our work on the duties on categorised services to ensure we deliver most quickly in the areas that we expect to be particularly beneficial in protecting users once the thresholds are confirmed. Specifically, we will accelerate work on the launch of transparency reporting in mid-2025, and allow ourselves time to use our information-gathering powers to inform policy development on the other duties. We now expect to consult on proposals regarding the other duties on categorised services no later than the first quarter of 2026.

The dates in this document reflect our current timelines; as we continue to address issues raised by stakeholders, and the government puts in place the necessary secondary legislation, it is possible some dates could change.

## What we've done so far

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### We've moved quickly to implement the new rules

In October 2023, we formally took on our role as online safety regulator when the Online Safety Act gained Royal Assent and we set out detailed plans requiring providers of online services to protect their users from illegal content and to protect children from harmful content, including pornography.

- In November 2023, two weeks after the Act became law, we launched a major consultation on [illegal harms online](#). We laid out proposals requiring tech firms to use a range of measures to protect their users from illegal content online – from child sexual abuse material and grooming to fraud, as well as other forms of illegal content.
- In December 2023, we followed this up with detailed [draft guidance](#) for online pornography services on how they can comply with their duties to use highly effective age assurance to prevent children from normally encountering pornographic material. The draft guidance proposed that age-checks should be technically accurate, robust, reliable and fair.
- On 29 February 2024, we submitted our [advice](#) to the then-Government on the thresholds to determine whether or not a service is designated as 'categorised'.
- In April 2024, our section 101 powers to gather information relating to the death of a child linked to coroners' investigations came into force. We worked closely with the Office of the Chief Coroner, Ministry of Justice and partners in the devolved administrations to develop and publish [information](#) to help coroners understand how these powers can be used to support an investigation or inquest into the death of a child. We have also consulted on guidance on the section 101 powers as part of our [information gathering consultation](#), which we published in July 2024.
- In May 2024, we [published](#) our proposals for how services should approach their new duties relating to content that is harmful to children. This includes how to assess if a service

is likely to be accessed by children, and the steps services need to take to keep children safe online, such as robust age checks, safer algorithms, and effective moderation.

- In October 2024, we published our [media literacy strategy](#). The Act added to our existing media literacy responsibilities, with requirements for Ofcom to build awareness of how people (and especially those most at risk of harm) can protect themselves and others online, while encouraging the use of technologies and systems by services that empower them to do so.
- Over 2023 and 2024, we have issued guidance to services on their responsibilities. This included our [October 2023 open letter](#) to video-sharing platforms regarding the crisis in Israel and Gaza, and our [August 2024 open letter](#) to online service providers about the increased risk of their platforms being used to stir up hatred, provoke violence and commit other offences under UK law, in the context of acts of violence in the UK over the summer.

We've consulted with hundreds of stakeholders on our proposals, and some stakeholders raised important points that need careful consideration. This work is ongoing.

## **We will bring the illegal harms and protection of children safety duties into force as quickly as possible**

The acts of violence seen across the UK in August 2024 demonstrated that the line between online and 'real life' harms is often blurred. We saw the risks that can arise from people using social media to stir up hatred and provoke violence – both priority offences under the Act. The events underlined the importance of moving quickly to implement the new laws so that services are held accountable for properly assessing the risks on their services and taking appropriate steps to make their services safer, including taking steps to prevent content of this kind appearing and acting quickly to remove it when they become aware of it.

Tackling illegal harms and protecting children online continue to be the most urgent focus. Our priority is to bring the new duties into force as rapidly as possible so we can ensure that service providers protect users from some of the most harmful forms of online content, conduct and contact: child sexual exploitation and abuse, terrorism, hate crimes, content promoting suicide and self-harm, and fraud.

We plan to build on the first edition of our Codes of Practice with further measures, including some that have been suggested to us by stakeholders in response to our consultations. However, to add new measures into our Codes of Practice will require further consultation and we need to follow the formal process set out in the Act. We have decided that, rather than delay finalising the first edition of our Codes, we will bring forward further proposals to strengthen the Codes after our first editions have come into force. **We intend to consult on these additional measures in spring 2025.** This will include work we announced earlier this year, to consult on how automated tools can be used to proactively detect illegal content and the content most harmful to children, going beyond the automated detection measures we have already consulted on.

There is overwhelming evidence that the online world can be a hostile place for women and girls and the Act requires Ofcom to produce guidance which focuses on the content and activity which disproportionately affects women and girls. We are prioritising this work in our implementation of the Act and are **bringing forward new proposals in February 2025, earlier than previously planned, on best practice guidance on protecting women and girls online.**

## **We have reprioritised our work on the duties on categorised services**

Categorised services will have extra obligations under the Act, such as producing transparency reports, applying their terms of service consistently, giving users more tools to control what they see, ensuring protections for news publisher and journalistic content, and preventing fraudulent advertising.

On 29 February 2024, we submitted our [advice](#) to the then-Government on the thresholds for designating a service categorised.

The next step is for Government to confirm the thresholds in secondary legislation. As soon as secondary legislation has been passed by Parliament, we will immediately begin the work to develop a register of categorised services, and aim to publish this around four to five months after the secondary legislation has passed. This work includes issuing formal, enforceable requests for information to allow us to assess whether services meet the thresholds.

In the meantime, we have reprioritised our work on the duties on categorised services, to focus on delivering those areas we expect to have the greatest immediate benefit, and to create capacity for us to bring forward our work to protect women and girls, and the new consultation on additional measures for the Illegal Harms and Protection of Children codes.

We expect the transparency duties will prove among the most effective in improving users' safety by shining a light on services' actions – and in particular by providing hard evidence, for the first time, about the effectiveness of their safety measures. **We will prioritise this work, aiming to start issuing draft transparency notices to services within a few weeks of the register of categorised services being finalised.** Based on a planning assumption that the categorisation secondary legislation will be laid by the end of 2024, this plan is in line with our commitment in the previous roadmap, where we committed to sending first draft transparency notices in summer 2025. **We expect the first transparency reports mandated by our notices to be published by services around the end of 2025.**

**We expect to publish draft Codes of Practice on the other duties on categorised services by early 2026.** This is around a year later than originally planned. This is partly because the thresholds have not yet been set in secondary legislation and partly due to our decision to rephase work on other critical needs, including bringing forward the guidance on protecting women and girls, consulting on further specific illegal harms measures, and accelerating work on transparency notices to issue these in 2025.

**The updated roadmap section of this document explains in detail our implementation timelines.**

## **These Codes create a strong foundation, and we will continue to build on them**

These first editions of the Codes of Practice will bring about a safer life online for UK users. They will also provide a firm foundation on which we can build in the years to come.

Our assessment, having engaged extensively with stakeholders since the Act passed, is that the new rules, and the measures proposed in the first sets of Codes, if confirmed, will drive significant change. They will require much more effective governance and risk assessment by service providers. Other cross-cutting measures, such as clear and effective content moderation and reporting and complaints systems, will help detect and remove illegal content, reducing associated harm. The measures to protect children against grooming in the Illegal Harms Codes are new and have not to our knowledge been proposed by any other regulator around the world.

Our proposed Codes would also materially expand the number of high-risk services that use hash matching (that is, techniques that can detect known illegal or otherwise harmful images and videos) and bring about a step change in the detection and removal of Child Sexual Abuse Material (CSAM). The draft Children's Codes of Practice go beyond current industry practice with measures including robust age assurance, safer algorithms, and tools and support to help children stay safe.

During these early years of the online safety regime, we will enforce the safety duties considering the measures outlined in the first edition of our Codes, while actively considering how to strengthen them further. Challenges, ideas, and evidence from stakeholders are already improving the proposed measures to keep users safe. We will continue to seek input from the public, civil society, service providers, and other expert bodies as this novel regulatory regime develops.

# The action service providers must take in 2025

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In this first year of the online safety regime, our focus has been on implementing the rules as required by the Act. Starting from mid-December, the focus will shift to service providers and the action they must take to comply with their new legal duties to protect users.

## Assessing and mitigating risk

### Illegal harms

All user-to-user and search services in scope of the Act must complete their illegal content risk assessments within three months of us publishing final illegal content risk assessment guidance. Services will need to be prepared to complete these assessments by mid-March 2025, following the planned publication of our final guidance in mid-December 2024. We will expect specific services to disclose their risk assessments to us from **31 March 2025**.

### Protection of children

All user-to-user and search services in scope of the Act must carry out a children's access assessment to determine if their service – or part of their service – is likely to be accessed by children within three months of us publishing final children's access assessment guidance. Services will need to be prepared to complete these assessments by April 2025, following the planned publication of our children's access assessment guidance in January 2025.

Services likely to be accessed by children must then carry out a children's risk assessment within three months of us publishing our children's risk assessment guidance in April 2025. Those services should prepare to complete their children's risk assessments by July 2025. We will expect specific services to disclose their children's risk assessments to us from **31 July 2025**.

Providers of online services that host pornographic content will have to use highly effective age assurance to prevent children from normally being able to access that content. These duties will start to come into effect from **January 2025**, when we expect Government to commence Part 5 of the Act, which covers services that publish pornography, and we will issue our final guidance relating to this part.

### Ensuring compliance with this duty

These risk assessments will ensure that service providers are effectively identifying and mitigating risks associated with illegal content and content harmful to children on their service.

The Act is clear that these obligatory assessments must be suitable and sufficient to identify all relevant risks services face. The Act gives us the power to take enforcement action, including imposing fines, for failures to comply. This will be an early priority for us.

## The changes we expect to see as the safety duties come into force

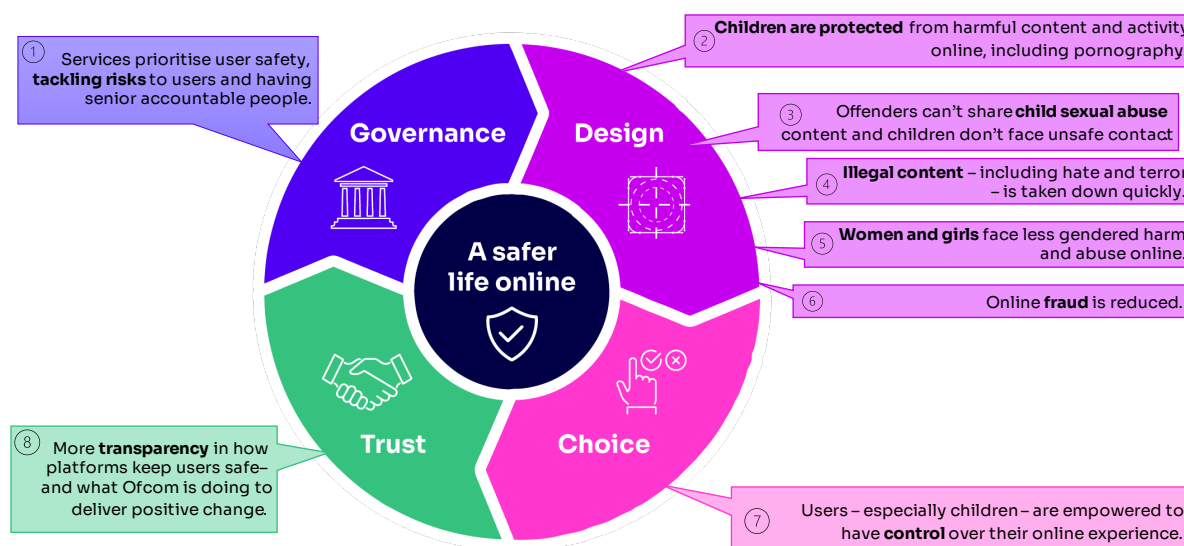
Where protections for users are inadequate, services must improve the systems and processes they use to keep users safe. It is not our role to take down individual pieces of content or block specific accounts. We will use our powers and duties under the Act to protect adults and children in the UK, by ensuring services use suitable measures to keep people safe.

Through implementing the Act, we want to deliver change in four key areas:

- stronger safety **governance** and risk management in online services;
- online services **designed** and operated with safety in mind;
- increased **choice** for users so they can control their online experiences; and
- greater **trust** built through increased transparency and accountability in how services operate.

Since our [2023 roadmap](#), we have identified eight targets for immediate action, based on where harm is greatest and where we know there are clear steps services can take.

**Figure 1: Our focus for the next three years**



**1. Services prioritise user safety, tackling risks to users, and naming senior accountable people.** We want to see services completing effective risk assessments and having internal risk and governance structures that address online safety. This includes identifying senior people and making clear who is accountable and responsible for user safety within services, as appropriate.

**2. Children are protected from harmful content and activity, including pornography.** We expect services to have safety measures that protect children, including tough age checks to stop them seeing content such as suicide and self-harm material and pornography, and to filter or downrank harmful material in content recommended by algorithms.

**3. Offenders can't share child sexual abuse content and children don't face unsafe contact.** We want the sharing of CSAM to become much more difficult, and children to be protected from contact from adults they don't already know. Almost a fifth of children experience sexual solicitation from adults they have chatted with online – change is needed to stop this.

**4. Illegal content – including hate and terror – is taken down quickly.** We expect services to have trust and safety measures that can tackle illegal content – including hate speech, terrorist content and content that encourages or assists suicide – and ensure it is taken down quickly once services are aware of it.

**5. Women and girls face less gendered harm and abuse online.** We want women and girls to feel safe online and not have to deal with as much harassment and misogyny, with effective reporting routes available to them where they experience harmful behaviour.

**6. Online fraud is reduced.** We want to see services having systems and processes in place to make it harder for online fraud to take place – including detecting, deterring, and preventing fraudulent activity. The categorisation duties will also require some services to deploy systems and processes designed to prevent fraudulent advertising.

**7. Users - especially children - are empowered to have control over their online experience.** We expect the biggest and most widely used (designated as 'category 1')



services to provide users with the tools to better understand their choices online, and the ability to adjust the content they see and who they interact with online. Our proposals for these services will draw on behavioural insights research and our long-standing Making Sense of Media programme.

**8. More transparency in how platforms keep users safe, and what Ofcom is doing to deliver positive change.** We will use our new transparency powers to help shed light on platforms' trust and safety measures and highlight good and poor practices. This will help to empower the public with more information. We'll also look to be transparent about what we are doing as the online safety regulator to push positive change and stop wrongdoing.

## We're working with services that pose particular risks, and are planning for immediate enforcement

As we prepare for the duties to come into force, we are engaging with industry to ensure that service providers know their duties, are supported to comply, and that the services that pose greatest risk to users – large or small – take rapid action to improve their protections. Our engagement work includes:

### Producing resources to support services to comply

A major priority for us is ensuring services complete effective risk assessments and have internal risk and governance structures that address online safety, and we will provide resources to help companies manage risk. These resources include:

- analysis of the causes and impacts of online harm, to support services in assessing the risks they face;
- guidance on a recommended process for assessing risk; and
- Codes of Practice, setting out what services can do to mitigate the risk of harm.

We also have an extensive programme of work to make the regulations accessible, and compliance more easily attainable for all online services which fall in scope of the Act, which include many small or medium-sized enterprises (SMEs). Plans for a new 'Digital Support Service', which consists of interactive digital tools for regulated firms and are based on their perspectives and feedback, are well advanced. This will be accessible on the Ofcom website. Our first release will provide a four-step process for illegal harms, covering services' risk assessment duties, Codes, and record-keeping obligations. This service builds on our online safety [Regulation Checker](#) (which firms and individuals can use to check if the rules apply to their service), our [quick guides](#) to the proposed regulations, and our [business enquiries service](#).

We have already launched a [communications campaign within the adult sector](#) to raise awareness of the new duties on services that host pornography, including running our first industry event on adult content. We will start a further campaign to raise awareness of the illegal harms risk assessment duties in early 2025.

### Targeted oversight of large and small services that pose particular risks

Our Supervision team is engaging with selected services that pose particular risk, either because of their size or because of the nature of the service. This targeted oversight includes understanding services' measures in detail, assessing how well they protect users, and pushing for timely improvements where necessary. We have set out our work to protect users from harmful content on 'small but risky' online services in a [letter to Government](#) in September 2024.

We have developed our supervisory approach through our existing work to regulate UK-established Video-sharing platforms (VSPs) since 2020. We have secured improvements across regulated VSPs, including the introduction of age assurance measures on adult websites and the introduction of new and improved measures to combat child sexual abuse material.

Our early engagement under the online safety regime, as well as work by the ICO to apply its [Children's Code](#), has shown a supervisory approach is effective in driving change. For example, we

welcomed changes that Meta has made to Facebook and Instagram, which are in line with measures to protect children from grooming in our proposed illegal harms Code, as well as Instagram’s introduction of ‘Teen Accounts’, which will limit who can contact teens and the content they can see, and provide important privacy and safety protections. In addition, we welcomed changes introduced by Snapchat to help prevent teenagers being contacted by strangers. It is a positive step to see these services taking action to keep their users safe, but there is still more to do, and we will continue to work with services to drive improvements in user safety.

## Enforcing the rules

Our preference is to work with services to encourage voluntary compliance. But we will, if necessary, launch enforcement action where we determine that a service provider is not complying with its duties, for example where we consider it is not taking appropriate steps to protect users from harm.

Under the Act, where we identify compliance failures, we can impose fines of up to £18m or 10% of the service provider’s qualifying worldwide revenue (whichever is greater). In the most serious cases of non-compliance, we can seek a court order imposing business disruption measures, which may require third parties (such as providers of payment or advertising services, or ISPs) to withdraw, or limit access to, the services in the UK.

Furthermore, service providers may commit a criminal offence if they fail to comply with an information notice or if they fail without reasonable excuse to take compliance action which is specified in an Ofcom decision finding that the service is in breach of certain duties relating to child sexual exploitation and abuse (CSEA) and child safety. In such cases, directors and other senior managers of the provider may also be criminally liable for the failures.

To support our investigations, we have powers to request information and obtain skilled person’s reports, and can take enforcement action where service providers fail to respond or provide inaccurate information.

Under our VSP work, Ofcom has issued several demands for information from in-scope services to promote transparency about the measures services take to protect their users and bring about improvements. In July 2024, Ofcom [found](#) that TikTok contravened its duties to provide accurate information in response to one such demand and we imposed a penalty of £1,875,000 as a result.

As we explain in more detail in the roadmap section of this document, we expect that the illegal harms safety duties and illegal risk assessment duties will become enforceable around March 2025 and the child protection safety duties and child risk assessment duties will become enforceable around July 2025. At this point we can begin investigations if we find that services are not compliant with these duties.

We expect our early enforcement action to focus on ensuring services are adequately assessing risk and putting in place the measures that will be most impactful in protecting users, especially children, from serious harms such as those relating to CSAM, pornography and fraud. Alongside targeted action against specific services, we will also launch broader multi-service or sector-wide compliance programmes as the key safety duties come into force, where we believe there may be systemic issues that need swift and comprehensive action to achieve the necessary change.

## The VSP regime will focus on areas where we can have the greatest impact until it is repealed

Regulation of Video-sharing platforms established in the UK has been in force since 2020 and will be superseded by the Act. On 30 April 2024 the Secretary of State laid a statutory instrument in Parliament which set 2 September 2024 as the ‘assessment start date’. This date triggered the requirements for existing VSP providers to carry out risk assessments and children’s access assessments for their services. September also marked the start of the required six months’ notice the Government must give VSPs of its intention to repeal the regime. The ultimate date of repeal will be decided by Government, and it is expected to happen after the Protection of Children Codes come into force around July 2025. Ofcom will support VSP providers in moving to the online safety regime; more information about this can be found in our [update on repeal of VSP regulation](#).

Our goals for the remainder of the VSP regime are to ensure that:

- VSPs have clear user policies that are easy to find and understand,
- terrorist videos or videos that incite hatred and/or violence are taken down quickly,
- abusers are prevented from sharing and/or watching child sexual abuse videos,
- children are prevented from finding and viewing pornographic videos on adult platforms,
- children are protected from finding and viewing other age-inappropriate videos, and
- all users can access easy-to-use and effective tools to report content or submit complaints.

The VSP regime is an effective testbed for how online safety regulation can work in practice. By using the range of regulatory tools available to us, we have been able to make progress in:

- identifying, researching and providing analysis of what is good and poor practice,
- recommending changes and embedding standards through supervisory engagement,
- improving measures by taking proportionate enforcement action when we have identified areas of concern, and
- shining a light on good and poor practices via published reports.

## Building knowledge and working with partners

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### **We have built capabilities to address new and emerging issues and launched work to evaluate the impact of our regulations**

Technology is always changing, and so too will online harms and risks. The emergence of generative AI provides a clear example of this. The Act is designed to be technology neutral to reflect these rapid developments. We are tracking new and emerging issues in online safety and have built infrastructure, tools and processes to place data at the heart of our online safety regulation.

Our horizon scanning programme continues to produce critical analysis on current and emerging technologies and trends. In June 2024, we launched the Online Safety Technology Lab – an in-house facility dedicated to investigating, testing and evaluating different technical approaches to online trust and safety. We've built strong links with the academic sector to influence the direction of future research towards the biggest technological challenges in online safety – such as AI, privacy and harm reduction. We've recently published discussion papers on [Red Teaming for GenAI Harms](#) and [Deepfake Defences: Mitigating the Harms of Deceptive Deepfakes](#).

Our evaluation work includes assessing whether our interventions are leading to changes in services' systems and processes, a safer online life for users, particularly children, and unintended consequences that need mitigation. We are conducting analysis and surveys this year to deliver benchmark data against which we can track change over time.

### **We are working closely with our partners to ensure a joined-up approach to online safety**

#### Partnering with other regulators

We continue to work closely with partner regulators in the UK as part of the Digital Regulation Cooperation Forum (DRCF) to deliver a coherent approach to digital regulation for the benefit of people and businesses online. We have worked particularly closely with the ICO to take careful account of data protection considerations, and alignment with its Children's Code in particular, in our proposals. The DRCF has stepped up joint work on AI governance and trialled a new multi-regulator service, the '[DRCF AI and Digital Hub](#)', to provide informal advice to innovators. It is also collaborating on advertising technology and safety technology – such as online choice architecture and cookies, age assurance and content moderation.

## Working with partners tackling online harms

Regulation is part of a much broader multi-agency approach to online harms across government, law enforcement and civil society. We are working closely with these partners to understand the harms and work collaboratively in a system-wide approach, including sharing intelligence and consulting on our policy proposals.

## International alignment

We co-founded and currently chair the Global Online Safety Regulators Network, the world's only dedicated forum for online safety regulators, ensuring our illegal harms and protection of children policy development is enriched by international best practice. We have also deepened our relationships with major regulatory counterparts across five continents, including UNESCO and the OECD.

We are working to ease compliance frictions that multinational companies might face, while ensuring that bad actors cannot exploit geography to dodge their UK regulatory responsibilities. This extends to how we develop the Codes of Practice and guidance documents – where possible, we have sought to make our approach coherent with counterpart regulatory frameworks, including the EU Digital Services Act (DSA). We recently signed a new agreement with the European Commission, that aims for greater coordination in the implementation of the Online Safety Act and the DSA.

## We continue to engage with children and those with lived experiences to drive change

Research informs all our work as a regulator. We currently have around 60 live research projects and have completed many more.

We know that formal consultation documents can be complex and detailed, and may contain sensitive, and potentially distressing, information about online harms. While we are legally required to consult on this detailed information, Ofcom is committed to taking an approach to engaging with the public, including those with lived experience and children, in a way that sensitively builds their understanding and seeks their views.

## Engaging with children

When developing our proposals to protect children online, we completed an extensive research programme, talking to more than 15,000 children and over 7,000 parents to understand online experiences and exposure to harms. We also commissioned Revealing Reality to speak to over 100 children from across the UK to find out their views on our draft protection of children codes.

Since our last Roadmap update, we've also set up a new Children's Online Safety Tracker (with Discovery Research and Childwise) which is currently being tested with children and will be going live in early 2025. We have also commissioned Beano Brain, a specialist children's insight agency, to work with us to further develop our research and engagement with children and parents over the coming years.

## Engaging with those with lived experiences

Responses to formal regulatory consultations are often not the best way for us to understand individuals' perspectives, especially when relating to their own experience of harm. We are already engaging with those with lived experience of harm to inform our policy development and are exploring how to further embed this experience in our work. This is important to us for two main reasons:

- to provide individuals with lived experience of harm with a meaningful and accessible way to contribute to our policy development, allowing for an ongoing dialogue beyond consultation responses; and
- to develop policy informed by the experiences of and benefitting people impacted by the types of relevant harm we are seeking to mitigate.

## Working with civil society and expert bodies

Engaging with civil society groups, academics, and expert bodies to ensure our work is informed by their expertise is also a critical aspect of our approach to developing regulatory policy. We have held over 300 meetings, roundtables, workshops and events with these essential stakeholders, received over 350 consultation responses from them, and undertaken six webinars focused upon our illegal harms and protection of children consultations that have reached over 370 organisations. We are grateful for the insight that they have provided; where possible, we have reflected that insight in the revised guidance and Codes we will publish in December, January and April, and in the new proposals we plan to publish in the spring. We will continue to work closely with all stakeholders as we implement the Act.

# Updated roadmap

## We remain on track to publish the first edition of our Illegal Harms and Protection of Children Codes by the statutory deadline

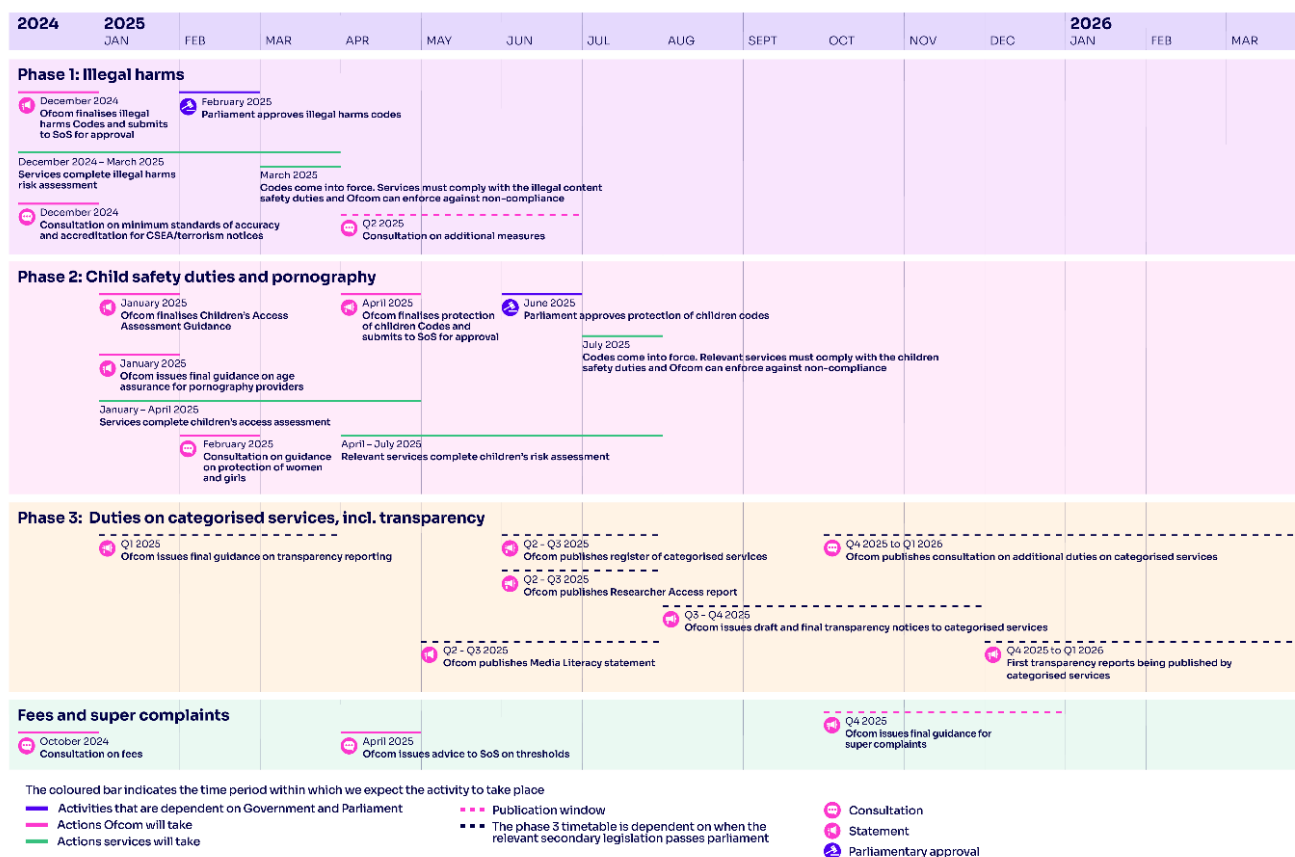
In October 2023, we published [our approach to implementing the Act](#). This set out our expected timetable for implementing the Act. At the time, we noted that these timelines could shift, not least because of the uncertainty around when the UK General Election would be called.

There have been no substantial changes in our timelines for phases one and two of our plans for implementation, which include illegal harms and protection of children measures. In this section we provide further detail on the timeline for the key milestones in these phases. As set out above, we have revised our timetable for implementing phase three.

The dates in this document reflect our current timelines; as we continue to address issues raised by stakeholders, and the government puts in place the necessary secondary legislation, it is possible some dates could change. We will continue to provide updates to this timetable.

Some steps in this timetable are for Government or Parliament to take. We have indicated when we expect these steps might occur, but specific timing is for Government and Parliament to decide. For phase 3 we have used the planning assumption that the secondary legislation will be laid before Parliament in December 2024.

**Figure 2: Our timetable for implementing the Act**



## Phase one: Illegal harms

The focus of this first phase are the Codes and guidance related to the illegal content duties. This will address the most significant dangers online such as terrorism and fraud and includes measures to protect children from child sexual exploitation and abuse. This phase is nearing completion.

In mid-December 2024, we expect to publish our Illegal Harms statement. This will include the first edition of the Illegal Harms Codes of Practice, and final illegal content risk assessment guidance. As set out by the Act, services will then need to complete their illegal content risk assessments within three months. When we publish this guidance, we will also submit the Illegal Harms Codes of Practice to the Secretary of State, which, subject to his approval, will be laid in Parliament for 40 days.

Once the Codes have passed through Parliament, the Codes will come into force after a 21-day implementation period. Subject to this Parliamentary process, we expect that the illegal harms safety duties will become enforceable around March 2025. At this point we can begin investigations and impose sanctions if we find that services are not compliant with these duties. Alongside our illegal harms statement in December 2024, we will also publish our final enforcement guidance, and final record keeping and review guidance.

We also plan to launch a further consultation which builds on the foundations established in the first Codes in spring 2025. We expect that these additions to the Codes will come into force at some point in 2026.

In December 2024 we plan to consult on our power to issue a Tech Notice under section 121 of the Act. A Tech Notice could require a Part 3 service provider to use or develop accredited technology to deal with CSEA and/or terrorism content, but only after several steps have been taken. Our consultation will consider some of those steps. It will cover our proposals on the minimum standards of accuracy for technology that may be required as part of a Tech Notice, and draft guidance for providers on how we propose to exercise our functions under section 121. Subject to consultation responses, we aim to submit our final advice on minimum standards of accuracy to the Secretary of State and publish our final guidance in 2025. Once the Secretary of State has published minimum standards of accuracy, we will develop the accreditation process so that applications can be submitted by technology developers.

## Phase two: Child safety, pornography, and protecting women and girls

The second phase of our work is focused on protecting children from legal content that may be harmful to them, including pornography, content relating to suicide, self-harm and eating disorders, content that is abusive and is targeted at, or incites hatred against, people on the basis of protected characteristics; bullying, and content depicting serious violence.

This phase has several components:

- First, as explained in the progress update above, **providers of online services that host pornographic content will have to use highly effective age assurance to prevent children from normally being able to access that content.** In January 2025 we will issue our final age assurance guidance for publishers of pornographic content, which we first [consulted](#) on in December 2023. We expect the government to commence the part of the Act relevant to these providers (Part 5) around the publication of our guidance, at which point their age assurance duties will be enforceable, and we will start to monitor compliance. The related duties on user-to-user services to prevent children from encountering pornographic content will be in force after the Protection of Children Codes have passed through Parliament, which we expect to be summer 2025.
- Second, regulated user-to-user and search services will have to conduct a children's access assessment. We will publish our **final children's access assessments guidance** in January 2025. As set out in the Act, service providers will then have three months to complete the children's access assessment process.

- This assessment will determine whether the service is likely to be accessed by children. If the service is likely to be accessed by children, the service will have to complete a children’s risk assessment and comply with the children’s safety duties in the Act. These include assessing the risks their services pose to children and taking steps to mitigate those risks.
- **We will publish our statement on child safety duties in April 2025. Alongside this statement we will also publish our final children’s risk assessment guidance.** Service providers will have three months from April 2025 to carry out their children’s risk assessments.

In April 2025 we will submit the Children’s Codes of Practice to the Secretary of State. Subject to the Secretary of State’s approval, they will then be laid in Parliament for 40 days. After passing through Parliament, the Codes will come into force after a 21-day implementation period. We expect that the child protection safety duties will become enforceable in July 2025. At this point we can begin investigations and impose sanctions for non-compliance.

In February 2025, we will publish our draft guidance on protecting women and girls, containing advice on content and activity which disproportionately affects women and girls, and on assessing and reducing the risk of harm to them. We expect to publish our final guidance by the end of 2025, with further iterations to this guidance planned as more of regime comes into force.

Finally, we will publish our report on content harmful to children before October 2026, and we will take forward further work on age assurance and app stores, with a view to publishing reports on these topics in 2026.

## Phase three: Categorisation and additional duties for categorised services

The third phase of online safety regulation will focus on the additional duties that will apply to categorised services. Services will be categorised and designated as category 1, 2A or 2B services if they meet certain thresholds set out in secondary legislation by Government.

These categorised services will be required to comply with a range of additional requirements, depending which category they are in, largely focused on bringing an enhanced level of safety, transparency, and accountability to the online world.

On 29 February 2024 we submitted advice for the Secretary of State regarding the thresholds for each category. The Secretary of State will set thresholds for categorisation in secondary legislation.

Once the secondary legislation has passed, we will gather relevant information from regulated services to determine which services fall under each threshold. **We will then publish a register of categorised services and publish a list of emerging category 1 services.** We expect to publish this register around four to five months after the secondary legislation has passed, which based on our current planning assumptions will be summer 2025.

For this phase of the work, **we have prioritised the launch of the transparency regime.** We expect to publish our final transparency reporting guidance in early 2025 as previously planned. We expect to start issuing draft transparency notices to categorised services within a few weeks of publication of the register, and to issue final transparency notices soon after. We therefore expect that the first transparency reports will be published by categorised services around the end of 2025.

Our [media literacy strategy](#) sets out what we will do to establish what works in empowering users to navigate online content and services safely. This includes tools and design features from services, and the skills and confidence people need to do that to flourish online. Ahead of delivering further Codes of Practice on user empowerment, **we will deliver a statement of recommendations on media literacy** to regulated services on how best to encourage media literacy in summer 2025, drawing on our latest evidence and research from those with lived experience as well as leading experts in this field.



**We plan to publish further proposals regarding duties on categorised services.** These proposals will cover tools for users to control what content they see, measures to ensure services apply their terms of service consistently, and a draft Code of Practice on fraudulent advertising.<sup>1</sup> We will issue formal and enforceable requests for information, as soon as we are able to do so, to ensure that our proposals regarding these duties are informed by accurate information from services about their current practices, and that we are not solely reliant on information available through research or published data. This will help ensure our proposals are specifically targeted to the particular services in scope of these duties, and more enduring.

As set out in the progress update above, we have revised our timetable for publishing these further proposals. We now expect to publish draft Codes no later than early 2026, up to a year later than originally planned. This rephased plan is driven both by the timetable for the necessary secondary legislation, and by our decisions to create additional capacity for new proposals on illegal harms, protection of children, and violence against women and girls, and to use requests for information to inform our policy development.

## Government and Ofcom have launched work to introduce a super-complaints regime

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The Act requires the implementation of a super-complaints regime for online safety. The intention of super-complaints in the Act is to enable eligible entities to raise systemic issues that arise across services, or in exceptional circumstances on one service, to the attention of the regulator.

The Secretary of State for the Department of Science, Innovation and Technology (DSIT) has [consulted on the criteria](#) for an entity to be eligible to make a super-complaint, criteria for a super-complaint to be admissible, and procedural requirements for making a super-complaint. The Secretary of State will finalise these criteria and procedural requirements in secondary legislation. Once the secondary legislation has been laid, Ofcom will consult on its guidance about super-complaints, which will include information on how an entity can verify its eligibility against the criteria and the procedures for making a super-complaint. We expect the guidance to be in place by the fourth quarter of 2025, subject to the secondary legislation being in place.

Where the complaint meets the statutory criteria, it will be treated as a super-complaint and handled by Ofcom in accordance with the timeframes and processes to be set out in regulations and in Ofcom's guidance. Ofcom will assess the eligibility of an entity to make a super-complaint on a case-by-case basis.

We expect that the high-quality evidence required to support a super-complaint will be a valuable source of information about systemic trends relating to online safety. Our response could include, but is not limited to, considering enforcement action where there is evidence that services are not complying with regulation.

## We expect our fees regime to be in place in 2026/27

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The online safety regime will be funded by fees paid by providers of regulated services whose qualifying worldwide revenue (QWR) meets or exceeds a certain threshold, and who are not otherwise exempt. Providers liable to pay fees will be required to notify Ofcom and will be invoiced accordingly. Fees will be calculated, among other things, with reference to the provider's QWR.

Ofcom and DSIT are both responsible for implementing the fees regime. Ofcom will determine QWR, any exemptions from the duty to notify and the duty to pay fees, and how the fees should be calculated. The Secretary of State will set the QWR threshold, having received advice from Ofcom.

In October 2024 we will consult publicly on how QWR is to be determined, any exemptions, and our approach to calculating fees, as well as the advice we will give the Secretary of State on the QWR

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<sup>1</sup> The primary additional duties on categorised services comprise: transparency; terms of service; user empowerment; user ID verification; news publishers duties; content of democratic importance; journalistic content; fraudulent advertising, and; deceased child user duties. For more information on these duties see our Phase 3 [call for evidence](#), which closed in May 2024.

threshold, and a draft of the statutory instruments. We expect to submit our advice to the Secretary of State in April 2025.

Much of the fees regime will be implemented via secondary legislation which will be scrutinised by Parliament. We are working with DSIT with the aim of implementing the fees regime by the 2026/27 financial year.