

YouTube is the world's largest video distribution platform, and it plays a huge role in the lives of young people and educators in the UK. We recognise the importance of this and take our responsibility to provide safer, high quality experiences on the platform extremely seriously. We want to provide young people across the UK with the space to navigate their imagination and curiosity safely, with their privacy and wellbeing at the forefront of our work.

For over two decades, we have prioritised effective safe design, thoughtful innovation, and continuous collaboration with independent child development and digital wellbeing experts. Our approach enables young users to discover interests and explore creativity, through robust baseline protection and tailored age appropriate experiences. On top of this, we ensure parents and caregivers have the tools and support to make informed choices about what's right for their families.

We appreciate the opportunity to respond to Ofcom's letter regarding industry expectations. Building on our extensive and constructive engagement with Ofcom to date, we trust the following explanations demonstrate how YouTube is not only meeting the expectations set out, but, in many areas, exceeding them through our approach to protecting young people.

1. Our commitment to protections for children

Since YouTube was launched in 2005, our [Community Guidelines](#) have set clear expectations to ensure YouTube remains a safe and appropriate environment. These include strict rules on violative content and sensitive topics like sex, nudity, suicide, self-harm, eating disorders, violent and dangerous content, as well as other material that might be harmful to children. Even where content does not violate YouTube's Community Guidelines, we may [restrict children from accessing that content where it is potentially harmful](#). Enforcement is supported by a combination of people and technology to flag and act on inappropriate content. As explained in Section 3 below, we also limit the recommendation of low quality content which does not meet the threshold of falling under these policies.

YouTube has already implemented the protections recommended by Ofcom in its Illegal Content and Protection of Children Codes and many of our longstanding safeguards go beyond these requirements. Our risk assessments, shared with Ofcom, set out these protections in detail.

We are encouraged to see more services adopting variations of approaches that align with our established highly effective AI-driven age assurance processes, meaning more users are protected from inappropriate content online. We support Ofcom's continued efforts to raise standards across the industry through proportionate, risk-based measures.

We strongly believe that, with appropriate protections, YouTube's rich and diverse content offers significant benefits to children. This includes the development of access to learning, opportunities for connection, and avenues for creative expression, which all contribute to their education, development and preparation for future employment.

For more than a decade, YouTube has invested in partnership with child development experts to build [tailored age-appropriate products](#) for younger users:

- **YouTube Kids (up to 12):** Launched in 2015, [YouTube Kids](#) offers carefully curated content that is age-appropriate and reflects a diverse range of interests.
- **Supervised Kids Accounts (Tweens):** Parents whose children are ready to explore a broader range of content can set up a [supervised account](#) and block specific channels, review and clear watch history.
- **Supervised Teen Accounts (13-17):** [Voluntarily linked accounts](#) allow parents to access activity insights and receive notifications at key milestones.

Our digital wellbeing tools - including [Take a Break](#) and [Bedtime](#) reminders which are on by default and the recently introduced [Shorts feed limit](#) - encourage more mindful screen use. Autoplay is not on by default for all known children and teens.

2. **Protecting children from online grooming**

Unlike many other services, YouTube does not offer direct messaging features for child users. As a video sharing platform, our core function is content distribution rather than user-to-user communication. This open design, combined with limited communication features, materially reduces the likelihood of adults contacting children they do not know - a position we welcome Ofcom having recognised in prior engagement.

Despite this low risk profile, we apply additional protections to reduce contact risks for minors:

- **Strict policy enforcement:** We enforce additional [child safety policies](#) that prohibit content that endangers children's emotional or physical wellbeing, including sexualisation, exploitation, and predatory behaviour. Our automated classifiers detect policy-violating content across videos and comments. We take a zero tolerance approach to enforcement, including the [termination of accounts or channels](#), in some cases in response to a single case of severe abuse, and notify law enforcement where we think a child is in danger.

- **Proactive safeguards on content featuring minors:** We use machine learning to identify hundreds of millions of non-violative videos depicting minors and automatically disable comments to reduce the risk of harassing or predatory behaviour.
- **Restricted comment environments:** For supervised child accounts, comment functionality is heavily limited or removed, with stricter filters applied and links to third-party sites blocked. Comments are always disabled on content designated as [Made for Kids](#).

3. Ensuring safe and high quality recommendations

Our recommendation system is designed to provide a safer, more enriching experience by elevating high-quality content aligned with the individual interests and the developmental needs of children and teenagers. Our recommendation system is guided by Quality Principles and sophisticated dispersion models, ensuring that younger users receive tailored, age-appropriate experiences that are distinct from those provided to adults.

Content that is identified as violating our Community Guidelines - which align closely with the categories of content harmful to children covered by the Online Safety Act - is removed from the platform and cannot be recommended. This approach ensures that harmful material is excluded, enabling high-quality, age-appropriate content to be prioritised in recommendations.

Exploration and high-quality, age-appropriate content

Personalisation makes it easy to navigate the over 20 billion uploaded videos on YouTube. It helps YouTube organise online content into something manageable and useful, making it easier and faster for every individual to find what's most helpful and meets their needs.

Personalised recommendations play an important role in helping younger users overcome practical barriers like spelling, typing, and query formation by surfacing relevant content (for example, when a child searches for "painting tips", it will return "how to draw" content instead of "house painting").

Our recommendations to children are informed by our [Quality Principles for Children's and Family Content](#). These principles outline best practices for creators to follow, and help to determine the inclusion of content in YouTube Kids - limiting the spread of low quality content. We have also introduced [Quality Principles for Teen Content](#), ensuring recommendations for teenagers reflect their evolving individual interests and needs. Both sets of principles have been developed in consultation with our [Youth and Families Advisory Committee](#), a collection of independent experts in children's media, child development, digital learning and citizenship from a range of academic, non-profit and clinical backgrounds.

Guardrails for teens and tweens to limit repeated recommendations

We recognise that repeated exposure to certain content can disproportionately affect teenagers, as they are more likely than adults to form negative beliefs about themselves when seeing messages about idealised standards. YouTube applies safeguards to reduce [repeated recommendations](#) of specific categories of content to specifically support the wellbeing and mental health of young people. Developed with our [Youth and Families Advisory Committee](#), our dispersion model reduces repeated exposure to content, including:

- social aggression
- content that compares or idealises physical features, body types, fitness, or weight
- unrealistic financial advice targeting teens
- delinquent or negative behaviours
- content encouraging ridicule or portraying teens as malicious

The model also applies to more nuanced or mature themes that may be harmful if consumed repeatedly.

YouTube has responded to Ofcom's questions as part of its cross-industry review of child-accessible content recommender systems. We believe our responses demonstrate that our systems deliver a net positive for younger users while maintaining strong safety outcomes.

4. Transparency in risk assessments

We agree with Ofcom's concern, expressed in its [press release](#), that new AI tools widely used by children should not be launched without parents being able to trust they have been developed safely. For clarity, YouTube does not offer chat-based AI services to under-18s in the UK.

More broadly, we take a careful and considered approach to deployment of new products and features, including AI features, particularly those affecting children. We take a deliberate, safety-led approach to deploying such technologies.

We maintain robust internal processes to ensure that [our approach](#) to AI is responsible. Our AI governance framework is comprehensive and multi-layered, spanning the full model lifecycle - from responsible model development and deployment, through to post-launch monitoring and remediation.

We identify and assess risks through research, expert input, and rigorous pre- and post-launch testing, which directly informs our policies and control frameworks. These are supported by

targeted mitigations designed to address identified risks and enable our safety measures to adapt continuously in response to a rapidly advancing technological landscape.

We have established policies and processes to identify and assess launches that may constitute a “significant change” under the Online Safety Act and therefore require updating our risk assessments. As set out in our risk assessments previously provided to Ofcom, this process is centrally managed and consistently applied across Google, forming part of a well-established risk management and governance framework that predates the Illegal Content and Child Protection duties. Our approach builds on Ofcom’s guidance, and places particular emphasis on changes that may impact children.

5. Ensuring age appropriate access

Unlike other platforms that do contain explicit prohibitions, [YouTube’s Terms of Service](#) are not intended to, and do not, entirely exclude users under 13 from YouTube. Those terms state that *“children of all ages may use [YouTube] and YouTube Kids (where available) if enabled by a parent or legal guardian”*. YouTube’s model is not one of exclusion; it is one of channeling younger users to parental supervision and the most age-appropriate experiences whilst applying robust, layered protections across all of YouTube.

Depriving these younger users of access to age-appropriate YouTube experiences altogether would restrict their access to enriching information, and to learn about culture and the world around them. Instead, our approach allows children to have a rewarding online experience, within an adequate framework of safety and protection.

Proportionate age assurance on YouTube

YouTube provides baseline protections for all users, including age-restricted content, ad limitations, and wellbeing tools like “take-a-break” reminders. These universal safety measures are further enhanced for kids and teens through stricter default settings and additional privacy prompts. It is on top of this protective baseline that our approach to age assurance seeks to balance protection, effectiveness, inclusiveness, and privacy, aligned with data protection principles of proportionality and data minimisation. We consider our multi-layered framework to be a state-of-the-art application of risk-based age assurance. We do not consider a one-size-fits-all model to be appropriate or effective, as it fails to account for the variable nature of how users interact with a video sharing platform. Instead, we apply measures proportionate to user risk and behaviour.

Our multi-layered approach

Our approach to age assurance combines self-reported age, technical measures, our age inference model, and, where necessary based on the risks, asking users to prove they are adults by providing ‘hard identifiers’.

Our waterfall approach operates as follows:

- **Neutral age gate & technical measures:** As a first step, users are asked to provide their date of birth when creating a Google Account, through a neutral age gate which prevents users from back-buttoning and changing their age.
- **Age inference model:** Unless a user declared themselves to be under 18 (in which case they are treated as such), we also rely on our age inference model to estimate whether the user is likely to be under 18 or over 18. To make this estimation, the model analyses activity signals associated with the user's Google Account. Protections for minors (e.g., no access to age-restricted content) are applied until the model confidently infers that a user is likely above 18.
- **Age verification methods:** We go further and apply age verification methods in specific circumstances. For example, if the age inference model assesses that a user is likely to be under 18, or is unable to infer (with sufficient confidence) that the user is over 18, that user may prove they are over 18 through a variety of age assurance methods including providing an image of a government ID document, credit card details, selfie age estimation or email verification.

Using the age assurance and verification methods described above, YouTube applies a suite of protections for child users, ensuring that only signed-in users assessed as over 18 can view age-restricted content. In addition, YouTube uses automated systems to detect YouTube channels that may be owned by users under 13 and then takes appropriate action on the account.

We strongly believe our approach is both protective and privacy-conscious: it ensures strong baseline protections and applies state-of-the-art measures at the point of risk.

We are separately responding to the UK ICO on age assurance. We encourage continued coordination between Ofcom and the ICO to maintain a coherent, risk-based approach.

YouTube is continuously working to strengthen protections for children and supports the role of Ofcom and the OSA in raising standards across industry and looks forward to continued, constructive dialogue.