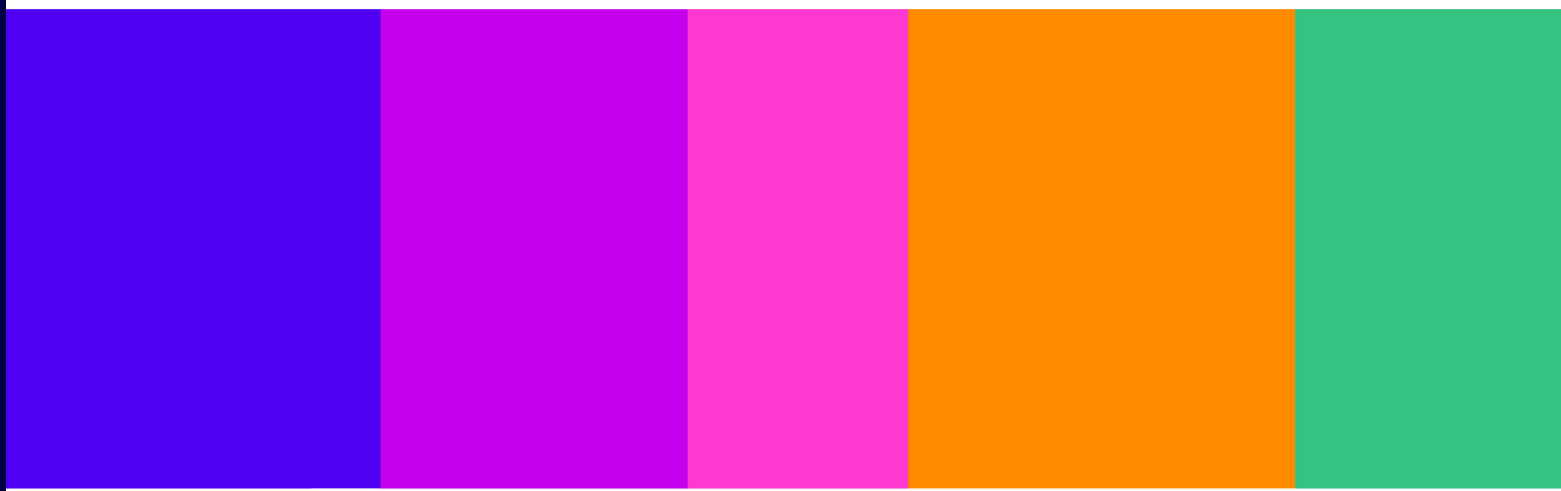


# Protecting children from harms online

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A summary of our decisions

Published 24 April 2025



# 1. Overview

**This document is a summary of Ofcom’s decisions on protecting children online. It is designed to help people understand our decision at a high level. Please read the full Protecting Children from Harms Online Statement for further detail.**

The UK Online Safety Act 2023 (the Act) <sup>1</sup> makes platforms – including social media, search, and pornography services – legally responsible for keeping people, especially children, safe online. These services have new duties to protect users in the UK by assessing risks of harm and taking steps to address them. As the UK’s online safety regulator, Ofcom’s role is to provide codes and guidance to support regulated services to comply with their duties and deliver a safer life online for people in the UK. The online safety framework is laid out in our [roadmap](#).

Securing a higher level of protection for children than for adults online is one of the objectives of the Act. The decisions set out in this statement form the foundations for creating a safer life online for children in the UK. They build on the rules that we have already put in place to protect all users, including children, from illegal harms such as protecting children from being groomed and sexually exploited.<sup>2</sup> They also complement the rules already in place to prevent children from encountering pornography online. We have already begun to ensure compliance with these new rules, including opening enforcement programmes.

Children in the UK benefit from the opportunities that technology offers and enjoy being online for many reasons, including learning, friendships, and entertainment. But our assessment of the causes and impacts of harm to children shows us that most children have encountered harmful content and activity online. This can have serious impacts on their mental and physical wellbeing and has been linked to the deaths of some children.

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

## What online services must do to protect children

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### **Assess whether children are likely to access their service – or part of it.**

All service providers should have now carried out children’s access assessments to determine whether children are likely to access their services and whether they are in scope of the children’s safety duties. The deadline for services to carry out this assessment was 16 April 2024.<sup>3</sup> We

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<sup>1</sup> [Online Safety Act](#)

<sup>2</sup> See [Statement: Protecting people from illegal harms online - Ofcom](#)

<sup>3</sup> See [Statement: Age Assurance and Children’s Access - Ofcom](#)

anticipate that most services not using highly effective age assurance will be in scope of the regulatory package that we are confirming today.

## **Complete a children's risk assessment to identify the risks their service(s) pose to children.**

Services in scope of the children's safety duties have until 24 July 2025 to complete and record their children's risk assessments, as set out in our [Children's Risk Assessment Guidance](#). This will complement the [illegal content risk assessments](#) that service providers have already completed.

As part of their children's risk assessments, providers must assess the risk of harm to children presented by content harmful to children, including non-designated content. They must also consider children in different age groups as part of their assessment.

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

## **Implement safety measures to mitigate the risks to children.**

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

- **Robust age checks:** At present, it is far too easy for children to access content that is harmful to them online. We expect the riskiest services to use highly effective age assurance to protect children from harmful content. If services have minimum age requirements and are not using highly effective age assurance to prevent children under that age using the service, they should assume that younger children are on their service and take appropriate steps to protect them from harm.
- **Safer algorithms:** Personalised recommendations are currently children's main pathway to encountering harmful content online. Service providers that have identified a medium or high risk of harmful content will be expected to configure their algorithms to ensure children are not presented with the most harmful content and take appropriate action to protect them from other harmful content.
- **Effective moderation:** We expect all services to have content moderation systems in place to take swift action against content harmful to children when they become aware of it.
- **User reporting and complaints.** Service providers need to make sure their processes are easy to access and use, increase transparency, and take appropriate action when users report harmful content.
- **Terms of service:** We will expect service providers to make sure their terms and conditions are clear and easy for children to understand.
- **More choice and support for children:** As well as easy-to-use reporting and complaints processes, children need tools and support to help them stay safe online. This includes supportive information for children who may have been exposed to harmful content, and safety default settings for the largest search services. Children can expect to be

given the choice to accept or decline invitations to group chats where they could encounter harmful content.

- **Stronger governance:** Keeping children safe starts with good governance. All services should have a named person accountable for children's safety. Other measures include an annual senior-body review of all risk management activities relating to children's safety and an employee Code of Conduct that sets standards for employees around protecting children.

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

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

Services cannot decline to take steps to protect children because it is too expensive or inconvenient – protecting children is a priority. All services, even the smallest, will have to take action.

## Updating Codes and guidance

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This is only the first version of our framework to protect children, and we will continue to review and iterate our approach to drive safer age-appropriate experiences online. We expect to update our regulation as new evidence arises on emerging risks to children and the measures that will best keep children safe online. We will scrutinise service providers' children's risk assessments and maintain close engagement with services to build our understanding of how they are meeting the children's safety duties. We will continue to build our evidence base, drawing on sources including our continued research with children and our report on the use and effectiveness of age assurance, which we will publish next summer.

## Next steps

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

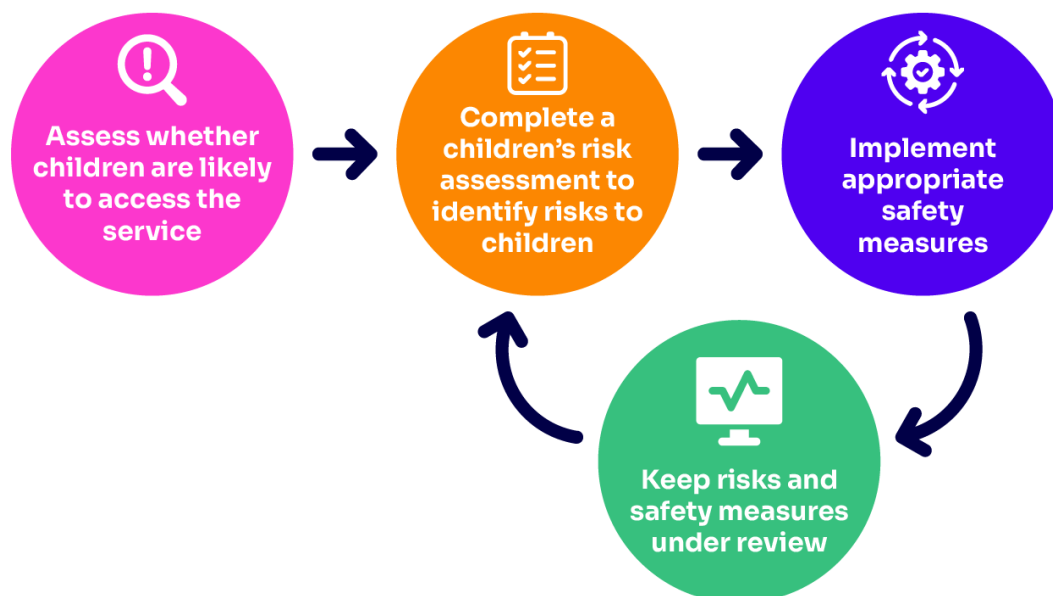
From 25 July 2025, as long as the Codes complete the Parliamentary process, providers will need to take the steps laid down in the Codes or use other effective measures to protect children. We will be expanding our digital toolkit for service providers to support them in completing children's risk assessments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

## 2. What we have decided

### Protecting children from harm online

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- 2.1 The Act creates a new regulatory framework which aims to make the online world safer for people in the UK. Securing better protections to help keep children safer online is one of the Act's main objectives. The Act is clear that the duties imposed on regulated services aim to make sure they are safe by design, and designed and operated in a way that provides a higher standard of protection for children than for adults.
- 2.2 The Act sets out requirements for [user-to-user services and search services](#) to ensure they protect children online, including:
- carrying out **children's access assessments** to assess whether children can access their service(s) or part of it;
  - if required, carrying out a **children's risk assessment** to assess the risks their service(s) pose to children;
  - **take safety measures** to tackle risks and protect children online; and
  - **keep risks and safety measures under review**.



## Content that is harmful to children

- 2.3 When complying with the children’s safety duties, service providers need to consider different types of content that is harmful to children. The Act defines ‘content that is harmful to children’ as falling into three broad categories.

Category of content	Brief description
Primary priority content that is harmful to children	Pornographic content, and content which encourages, promotes, or provides instructions for suicide, self-harm, and eating disorders.
Priority content that is harmful to children	Content which is abusive or incites hatred, bullying content, and content which encourages, promotes, or provides instructions for violence, dangerous stunts and challenges, and self-administering harmful substances.
Non-designated content that presents a material risk of harm to children	Types of content that do not fall within the above two categories which present “a material risk of significant harm to an appreciable number of children in the United Kingdom”.

- 2.4 Our [Children’s Register of Risks](#) sets out how risks of harm to children manifest online and our [Guidance on Content Harmful to Children](#) sets out examples of what kinds of content Ofcom considers to be, or not to be, content harmful to children. Both documents can also be used as reference material.

## Protection of Children Codes and guidance

- 2.5 The Codes and guidance are designed to support online services to comply with their duties under the Act.
- 2.6 In [Volume 2](#) we explain how we reached our decisions in relation to the Children’s Register of Risks, Children’s Risk Profiles and Content Harmful to Children Guidance. Our [Children’s Register of Risks](#) provides information on how risks of harm to children manifest online; and our [Guidance on Content Harmful to Children](#) will support service providers in interpreting the different categories of harmful content.
- 2.7 The [Children’s Risk Assessment Guidance](#), which incorporates the [Children’s Risk Profiles](#), supports service providers to assess the risk of harm to children presented by content harmful to children on their service(s). [Volume 3](#) lays out our approach to governance and risk management and the decisions that have been made in regard to the Children’s Risk Assessment Guidance.

- 2.8 In [Volume 4](#), we set out the decisions that we have made in relation to the Codes. There are two Codes, one for [user-to-user services](#), and one for [search services](#).
- 2.9 The need to ensure the protection of children online is at the heart of our decision making. The Codes balance the need to protect children with the benefits of being online. We have carefully considered the potential impact on children's and adults' rights, including their rights to freedom of expression and privacy, when determining what measures are appropriate and proportionate, as required by the Act. As required by the Act and the Communications Act 2003, in reaching our decisions we have weighed up all relevant considerations, including the impact and cost to services, to ensure that the measures are proportionate.

## Children's risk assessments

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**We have published [the Children's Risk Assessment Guidance](#) on how services should complete their children's risk assessments. Our decisions in relation to the Children's Risk Assessment Guidance are set out in Volume 3.**

- 2.10 Services that are likely to be accessed by children will be required to complete a children's risk assessment. This is to ensure they have an adequate understanding of the risks to children that arise from their service, so that they can implement the necessary measures to manage and mitigate those risks.
- 2.11 Our Children's Risk Assessment Guidance sets out a four-step risk assessment process for service providers to follow. This involves providers: (i) understanding content harmful to children they need to assess in their children's risk assessment; (ii) assessing the likelihood and impact of children encountering content harmful to children on their service; (iii) deciding what measures to take to mitigate risk to children; and (iv) reporting on, reviewing and updating the children's risk assessment. Services are also required to take into account Ofcom's Children's Risk Profiles, which set out relevant risk factors for online services.
- 2.12 We have sought to align the Children's Risk Assessment Guidance with the Illegal Risk assessment guidance where possible. Services likely to be accessed by children must carry out a children's risk assessment in addition to their illegal content risk assessment.
- 2.13 The guidance explains what amounts to a 'suitable and sufficient' children's risk assessment, and how a service provider should record their children's risk assessment. It is a requirement that service providers keep their children's risk assessments up to date, and we have set clear expectations regarding how providers may meet this duty. We have also provided guidance about what amounts to a significant change as a trigger to carry out a new children's risk assessment.
- 2.14 Having considered stakeholder responses, we have confirmed the four-step risk assessment approach and clarified some aspects of the guidance, including how service providers should identify and assess the risk of harm presented to children by non-designated content on their service. We have additionally clarified our expectations for service providers around the duty to assess their user base, and to give separate consideration to children in different age groups, noting the relevance of different kinds of evidence on user age.

## Implement measures to protect children online

**The Codes set out the measures providers of user-to-user and search services can take to help keep children safe.**

- 2.15 Providers of services likely to be accessed by children are required by the Act to use proportionate safety measures to keep them safe. The Codes provide a set of safety measures that online services can take to help them meet their duties under the Act. Service providers can decide to comply with their duties by taking different measures to those in the Codes. However, they will need to be able to demonstrate that they secure compliance with the children's safety duties and keep a record explaining how they have done this, explaining how relevant duties have been met.
- 2.16 The Codes build on the [Illegal Content Codes](#), which are already in force, and protect all users, including children, from illegal harms such as protecting children from being groomed and sexually exploited. They also complement the [rules for 'Part 5' pornography services](#), including the requirement to have highly effective age assurance in place to prevent children from accessing pornography.
- 2.17 There is no single measure that providers can take to adequately protect children online. Safety measures need to work together across services' systems and processes to ensure that they are safe by design and that children are protected from harmful content. We are including a set of over 40 safety measures in the first iteration of the Codes that will work together to achieve safer experiences for children online. These measures build on the children's risk assessment duties by explaining how providers should address the risks posed by their services. In the first iteration of the Codes, we are including measures in the areas set out in the following paragraphs.

### Governance and accountability

- 2.18 We set out seven Governance and Accountability measures for user-to-user and search services. All services should have a named person accountable for children's safety. These measures will embed accountability, oversight, independence, transparency, and clarity of purpose into providers' operations. We expect providers to have well-functioning governance and organisational design structures and processes. This should enable providers to better understand and anticipate risks, increasing the likelihood that risks of harm to children will be prioritised appropriately and factored into strategic decision-making. This will also assist service providers to mitigate risks appropriately.

### Terms of service and publicly available statements

- 2.19 We include three Terms of Service and Publicly Available Statements measures. Two of these aim to ensure services' terms and statements are clear and accessible to children. These measures will help children and the adults who care for them to understand the provisions in place to protect them and enable them to make informed choices about the services they use. We are also recommending a further measure for Category 1 and Category 2A services which explains they should summarise the findings of their children's risk assessment in their terms and statements. This will ensure they are transparent with children and their parents or carers about the risks their services pose to children.



## Age assurance

- 2.20 We set out seven Age Assurance measures for providers of the riskiest user-to-user services. These measures will enable providers to determine which of their users are adults so that they can take steps to protect children while respecting adults' rights to access legal content. These measures underpin our other recommendations and enable the targeting of our other safety measures to protect children by preventing them from being exposed to harmful content.

## Content moderation for user-to-user services

- 2.21 We set out eight Content Moderation measures for user-to-user services. These measures will ensure all providers have moderation processes in place to review, assess, and take swift action on harmful content. They will also ensure that providers of large or multi-risk services are equipped to moderate harmful content at scale.<sup>4</sup> These measures will reduce the likelihood that children encounter harmful content on such services, leading to an increase in safety for children online. We have made changes to the measures for providers of services that cannot take action on content identified as harmful.

## Search moderation

- 2.22 We include seven Search Moderation measures that aim to reduce the likelihood that children encounter harmful content on or via search services. These measures will ensure all search providers have processes in place to review, assess and take appropriate moderation action on harmful content. In addition, the 'safe search' measure for providers of large general search services aims to achieve higher protections for users determined to be children by recommending PPC is filtered out of their search results, and that children cannot switch this setting off. The measures will also ensure that providers of large general search services or multi-risk search services are equipped to moderate harmful content at scale.

## User reporting and complaints

- 2.23 We set out 14 Reporting and Complaints measures designed to make services' processes easier to access and use, increase transparency, and ensure providers take appropriate action in response to complaints and appeals. These measures will ensure services have effective complaints processes in place, which will help them take steps to protect children from encountering harmful content and improve any systems they use to detect harmful content. This will ensure providers can make their services safer for children and that they respect users' rights.

## Recommender systems on user-to-user services

- 2.24 We include three Recommender Systems measures for user-to-user services. These measures require services to design and operate their recommender systems using a precautionary approach. This means protecting children from content that is indicated potentially to be harmful, rather than waiting for content to be confirmed to be harmful through content moderation. One of these measures will also give children more control

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<sup>4</sup> A service is multi-risk if it is medium or high risk of two or more specific kinds of content that is harmful to children.

over the content that is recommended to them. These measures will work to reduce the likelihood of children encountering harmful content on their recommender feeds.

## User support

- 2.25 We include six User Support measures for user-to-user services and one measure for search services. These measures will ensure children are provided with tools to enable them to have more control over their online experiences and have access to information to support them throughout their user journeys. These measures will give children more choice about their online interactions and provide added support to keep them safe online.

## Search features, functionalities, and user support

- 2.26 We set out two further measures for large general search services. The first of these aims to ensure providers embed safety into the design of predictive search functionalities by offering users a means to easily report potentially harmful search suggestions and taking action to ensure risky suggestions are no longer recommended. The second measure aims to reduce the risk of children encountering suicide, self-harm or eating disorder content in or via search results and to mitigate the risk of very serious harm to children in that context through the provision of relevant support resources.
- 2.27 These measures are set out in our accessible [Codes at a glance](#) document.

## How we determine which services should implement each measure

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- 2.28 In recommending measures, the Act requires us to ensure regulation is proportionate. We recognise that the size, capabilities, and risks of services differ widely and we have taken this into account in our impact assessments. We have recommended different measures for different types of services, with the most extensive expectations applying to the riskiest and largest services. Small services that pose a high risk to children are also expected to take a wide range of measures to address the risk of harm to children.
- 2.29 As a result, we recommend that all services accessed by children – regardless of their size or risk – implement a core set of measures to protect children online. We recommend additional measures for services that pose a greater risk of harm to children, irrespective of their size, and costly measures for smaller services only where there is clear risk of harm and where we have evidence that the measures will make a material difference in dealing with this risk. Larger and better-resourced services that pose the most material risks to many children will be expected to go even further.
- 2.30 This means in practice that each measure is ultimately recommended based on relevant criteria, which include:
- the type of service, including distinguishing between user-to-user and search services where appropriate;
  - the outcome of the service's latest children's risk assessment, and what risks have been identified in relation to content harmful to children; and
  - relevant functionalities and other characteristics of a service that have been shown to pose risks to children; and

- the size of a service, in terms of its UK user base: a 'large' service is one that has an average user base greater than seven million per month in the UK, approximately equivalent to 10% of the UK population.

# 3. What we have published

This statement includes six volumes which set out our analysis and the approach we have taken. We provide an overview below for ease of reference.

## **Volume 1: Overview, scope and regulatory approach**

Volume 1 sets out the scope of the statement, including an introduction to our duties and online safety functions and the children's safety duties, and our regulatory approach..

## **Volume 2: The causes and impacts of online harm to children**

Volume 2 presents our approach to three regulatory products: our Children's Register of Risks, our Children's Risk profiles, and our Guidance on Content Harmful to Children.

## **Volume 3: Assessing the risks of harms to children online**

Volume 3 sets out our approach to governance and risk management across this statement and as well as our approach to the guidance we are required to produce for service providers completing children's risk assessments. Our Children's Risk Assessment Guidance is published separately.

## **Volume 4: What should services do to mitigate the risk of online harms to children?**

Volume 4 explains the measures we recommend that services take to keep children safe online. These measures form our Codes, which are published separately for user-to-user services and for search services.

## **Volume 5: Annexes**

Volume 5 includes details of the assumptions used in our economic assessment, our legal framework, equality and Welsh language impact assessments, our summary of additional measures proposed by stakeholders, and our glossary.

## **Volume 6: Illegal harms further consultation: User Controls**

Sets out our proposal to amend Measures ICU J1 (blocking and muting) and ICU J2 (disabling comments) in the Illegal Content Codes of Practice, bringing providers of certain smaller user-to-user services that are likely to be accessed by children into scope of these measures where they have relevant risks and functionalities.

We are proposing that providers should either use highly effective age assurance to offer child users the option to block and mute other users and disable comments on their content or should offer these controls to all users on the parts of the service that are accessible by children.

We welcome stakeholder comments on these proposals by **22 July 2025**.