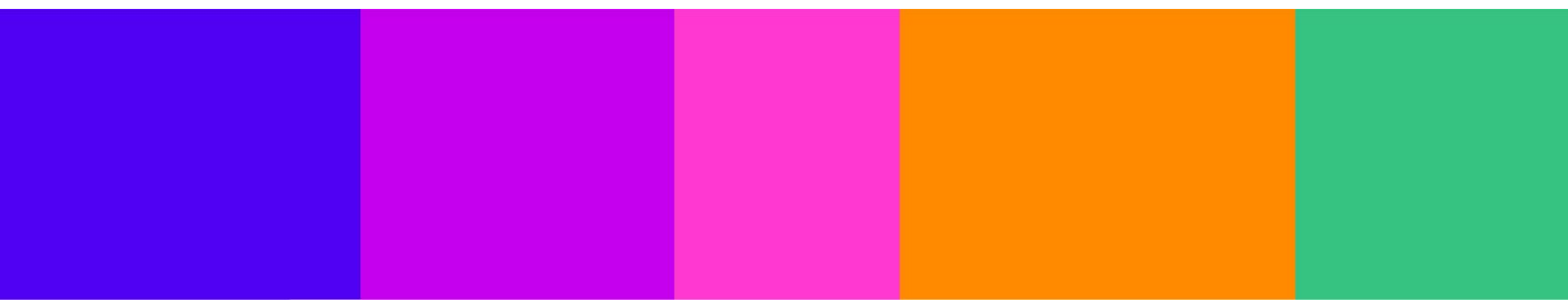# Consultation response form

Please complete this form in full and return to protectingchildren@ofcom.org.uk.

Consultation title	Consultation: Protecting children from harms online
Organisation name	Skyscanner

Your response

Question	Your response
Volume 2: Identifying the services children are using Children's Access Assessments (Section 4).	
Do you agree with our proposals in relation to children's access assessments, in particular the aspects below. Please provide evidence to support your view. 1. Our proposal that service providers should only conclude that children are not normally able to access a service where they are using highly effective age assurance? 2. Our proposed approach to the child user condition, including our proposed interpretation of "significant number of users who are children" and the factors that service providers consider in assessing whether the child user condition is met? 3. Our proposed approach to the process for children's access assessments?	Confidential? – Y (part in yellow) Skyscanner understands the clear intent of the Online Safety Act to ensure that regulated services are designed and operated in a way that secures a higher standard of protection for children than for adults. However, we believe that Ofcom's current approach to children's access assessments is designed to make it incredibly difficult for services to conclude that they are not likely to be accessed by children without using highly effective age assurance technologies (HEAA). This approach places an undue burden on low-risk services, regardless of their size. It will require many services that pose effectively no risk of harm to children to undertake a regular children's risk assessment and comply with associated duties, significantly increasing the work required to comply with the Online Safety Act, for no additional benefit to the safety of children online. As explained below, we recommend that Ofcom provides additional ways for services that cannot feasibly employ HEEA to evidence that children are not likely to access their services, potentially by introducing a different type of children's access assessment for low-risk services, or for vertical search services (VSS) specifically. Ofcom should also take a flexible approach to the child user condition to ensure that services do not face the same barriers across both step one and step two of the proposed assessment. This will make sure that the regime remains proportionate by giving due weight to services' risk profile in determining whether they need to fill out a children's risk assessment. Ofcom should also acknowledge that, while the proposals do not force sites to adopt HEEA (since they can always decline to do so and move forward to carry out the children's risk assessment), the act of carrying out such regular risk assessments, in addition to the other requirements under the Act, is also disproportionate for those types of service that pose a negligible risk of harm to children because of their limited functionalities and

Question	Your response
	their purpose. For such services, any resource dedicated to performing a children's risk assessment and complying with any subsequent duties is resource that cannot be more productively used elsewhere.
	Question 1
	Skyscanner recognises that the Online Safety Act provides that service providers can only conclude that children are not normally able to access a service 'if age verification or age estimation is used on the service with the result that children are not normally able to access the service or that part of it.'
	We expect that it will be considered that children are normally able to access our service, although we do not expect that we should meet the child user condition (more on this below). Given that the Act requires age verification or age estimation to conclude anything else, we understand that Ofcom will have to have regard to this provision. For context, however, we would like to point out that many services will be unable to implement age verification or estimation. For example, Skyscanner's business model is built on providing a seamless, quick, and user-friendly search experience. Introducing mandatory age assurance or verification steps for our users would disrupt this process. [✂
	] This demonstrates that users do not like additional steps or friction in the search process. If we were to require age verification as a mandatory step before a user could even enter our site, it is highly likely that the number of user drop-offs (when users decide to leave the site rather than following the age verification process) would rise significantly. Higher drop-off rates lead to lost revenue. Such an outcome, for low-risk services, would be clearly disproportionate, and so introducing HEEA is not an option for sites like Skyscanner. It would also conflict with our priorities regarding user privacy. We therefore caution against Ofcom's highly stringent interpretation of the Act's provisions, in which it proposes to require HEAA as the sole method to ensure that children cannot access a service. We call on Ofcom to reevaluate whether there

Question	Your response
	are other age verification or age estimation techniques that are less burdensome.
	Question 2
	Skyscanner recognises that the Act's provisions on the child user condition require that a service (that does not employ age verification or estimation) must provide evidence that they do not meet either of the two criteria to conclude that their service is not likely to be accessed by children. We welcome Ofcom's considered holistic approach to the condition, particularly the acknowledgment that it may be difficult for services to reach a definite conclusion regarding the first criterion. Given this acknowledgement and Ofcom's commitment to being proportionate and effective, Ofcom could be more flexible in its approach to considering evidence provided by services to illustrate that they do not meet the child user condition. This will ensure that services that cannot employ HEAA do not encounter the same barriers when assessing the child user condition as they will encounter in the first step of the children's access assessment.
	We believe that Ofcom should give due weight to services' assessment that they are not of a kind likely to attract children when assessing whether there may be a significant number of children who are users of the service. We also recommend that Ofcom puts forward more examples (beyond the examples listed in Annex 5, such as internal data on reporting and complaints, which we welcome) of types of evidence services can provide, that do not require the use of age assurance, to illustrate that they do not meet the first criterion. This can help low-risk services such as Skyscanner that are not able to determine the demographic characteristics of their users avoid becoming automatically classified as being likely to be accessed by children and thus having to complete a children's risk assessment.
	Due to the commercial non-viability of employing HEAA (as explained above), and our adherence to data protection laws, Skyscanner cannot track the demographic characteristics of our users. This limitation makes it challenging to provide the required evidence for the first condition unless Ofcom commits to a flexible approach.
	Question 3

Question	Your response
	The above underscores the need for a more proportionate approach to the children's access assessment that accounts for the limitations services encounter when collecting user data and that considers the nature of the service and its actual risk profile. Skyscanner's service model, which aggregates travel options and does not host harmful content, should be given more weight in the assessment process to avoid unnecessary and disproportionate burdens on services that do not pose a risk to children. This could be achieved either through a separate children's access assessment for low-risk VSS, or through changes to the child user condition assessment, as outlined above.

Volume 3: The causes and impacts of online harm to children

Draft Children's Register of Risk (Section 7)

Question	Your response
Proposed approach: 4. Do you have any views on Ofcom's assessment of the causes and impacts of online harms? Please provide evidence to support your answer. a. Do you think we have missed anything important in our analysis? 5. Do you have any views about our interpretation of the links between risk factors and different kinds of content harmful to children? Please provide evidence to support your answer. 6. Do you have any views on the age groups we recommended for assessing risk by age? Please provide evidence to support your answer. 7. Do you have any views on our interpretation of non-designated content or our approach to identifying non-designated content? Please provide evidence to support your answer. **Evidence gathering for future work:**	Confidential? – N Question 4 Skyscanner strongly welcomes Ofcom's inclusion of a dedicated section (7.10) in Volume 3 of the Children's Register of Risks specifically for search services. The detailed and thoughtful approach Ofcom has taken in considering the unique characteristics of different types of search services when assessing the causes and impacts of online harms to children is commendable. We have outlined below specific feedback on the identified characteristics of search services that Ofcom has linked to increased risks of harm to children. The below feedback is consistent with the feedback we shared in our response to Ofcom's Illegal Harms Consultation. Service type: We appreciate Ofcom's decision to include service type, distinguishing between general search services and vertical search services (VSS), as a specific risk factor. The acknowledgment of the source of content presented on search services is crucial. The use of a travel search site, such as Skyscanner, as an example to illustrate how a VSS "may be much less likely to present a user with content harmful to children" is particularly welcome. The type of content presented on Skyscanner, and the way in which we source that content, is a fundamental reason why we pose a negligible risk of presenting harmful content to children as defined by the Online

Question	Your response
8. Do you have any evidence relating to kinds of content that increase the risk of harm from Primary Priority, Priority or Non-designated Content, when viewed in combination (to be considered as part of cumulative harm)? 9. Have you identified risks to children from GenAI content or applications on U2U or Search services? a) Please Provide any information about any risks identified 10. Do you have any specific evidence relevant to our assessment of body image content and depressive content as kinds of non-designated content? Specifically, we are interested in: a) (i) specific examples of body image or depressive content linked to significant harms to children, b. (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content. 11. Do you propose any other category of content that could meet the definition of NDC under the Act at this stage? Please provide evidence to support your answer.	Safety Act. As a travel metasearch service, Skyscanner sources content from professional partners, which we are easily able to remove from our search results where necessary, and our contracts with partners require our partners to ensure that all content they share with us complies with relevant laws and regulations. This gives us a higher degree of control over the content presented on our platforms. Given the nature of our business as a travel search site with limited search content, the risk of content that is harmful to children being present on our site is low or negligible. User base: Regarding user base as a risk factor for search services, we believe that the draft Register of Risks offers limited utility for VSS. While it is noted that user base is considered in "a very limited way" (7.10.28) for search services, we disagree that the size of a vertical search service's user base should be considered a risk factor at all. If the functionalities of a service inherently prevent relevant harms, the size of the user base becomes irrelevant. Additionally, there is currently no guidance from Ofcom on how to consistently calculate user numbers for search services, especially since most do not require users to create accounts. Functionalities: With regards to search prediction and personalisation as functionalities that pose risks, it would be beneficial for the Register of Risks to specify that the risk pertains to free-form search predictions. Predictive search functionalities based on a narrow and defined subset of possible search queries (e.g., departure airports or cities) should be excluded. The limited search functionality on Skyscanner is a fundamental reason why we pose a relatively negligible risk of presenting harmful content to children. Lastly, as Volume 3 notes (specifically 7.10.16), all of the published evidence that Ofcom has used in its assessment of search services stems from research on general search services only. We welcome this recognition but believe that it could be more explicitly stated that Ofcom is not aware of any evidence of child users encountering harmful content on VSS sites. This would make using the Register easier and quicker for VSS when conducting their risk assessments. As outlined below in our answers to questions on the children's risk assessment and safety

Question	Your response
	codes, we also believe that the fact Ofcom is not aware of any evidence on the risks posed by VSS could be better reflected in some of the measures being proposed. It is clearly disproportionate, in our view, for VSS to be required to comply with some of these measures when Ofcom has no evidence in the Register of Risks that VSS pose the same level of risk as other search services.
	We also believe that the fact that Ofcom is unaware of any evidence of harm to children on VSS is a further reason why a more proportionate approach should be taken to the children's access assessments. The access assessment should be designed in such a way that only those services for which there is solid evidence they pose harm to children progress to the children's risk assessment.
Draft Guidance on Content Harmful to Children (Section 8)	
12. Do you agree with our proposed approach, including the level of specificity of examples given and the proposal to include contextual information for services to consider? 13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children? 14. For each of the harms discussed, are there additional categories of content that Ofcom a) should consider to be harmful or b) consider not to be harmful or c) where our current proposals should be reconsidered?	Confidential? – Y / N
Volume 4: How should services assess the risk of online harms? **Governance and Accountability (Section 11)**	

Question	Your response
15. Do you agree with the proposed governance measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response. 16. Do you agree with our assumption that the proposed governance measures for Children's Safety Codes could be implemented through the same process as the equivalent draft Illegal Content Codes?	Confidential? – N Question 15 Skyscanner welcomes the alignment between the proposed governance measures for illegal harms and the child safety duties. We strongly agree with the majority of the proposals concerning governance and accountability measures, particularly as they pertain to large low-risk vertical search services like ours. Specifically, we appreciate the decision to exempt such services from many of the more onerous measures. This exemption recognises the inherently low risk posed by our service to children and allows us to maintain our focus on providing a seamless user experience while still ensuring the safety of all our users. For a more detailed understanding of our position, please refer to our answers to questions 3 i) and 4 ii) in our submission to the Illegal Harms Consultation.

Children's Risk Assessment Guidance and Children's Risk Profiles' (Section 12)

Question	Your response
17. What do you think about our proposals in relation to the Children's Risk Assessment Guidance? a) Please provide underlying arguments and evidence of efficacy or risks that support your view. 18. What do you think about our proposals in relation to the Children's Risk Profiles for Content Harmful to Children? a) Please provide underlying arguments and evidence of efficacy or risks that support your view. Specifically, we welcome evidence from regulated services on the following: 19. Do you think the four-step risk assessment process and the Children's Risk Profiles are useful models to help	Confidential? – N Question 17 Skyscanner welcomes the alignment between the Children's Risk Assessment Guidance and Service Risk Assessment Guidance for Illegal Harms. As explained in our answer to question 8 in our submission to the Illegal Harms Consultation, Skyscanner agrees with certain aspects of Ofcom's proposals, as follows: • We believe that the four-step process which, if followed, allows services to easily comply with many of the children's safety and reporting and review obligations, is innovative and helpful for compliance. • We agree that what constitutes a "suitable and sufficient" children's risk assessment is a context-specific requirement. This should allow services flexibility when meeting this requirement based on their characteristics (which are so fundamental to the risk of content harmful to children appearing on their service).

Question	Your response
services understand the risks that their services pose to children and comply with their child risk assessment obligations under the Act? 20. Are there any specific aspects of the children's risk assessment duties that you consider need additional guidance beyond what we have proposed in our draft? 21. Are the Children's Risk Profiles sufficiently clear and do you think the information provided on risk factors will help you understand the risks on your service? a) If you have comments or input related to the links between different kinds of content harmful to children and risk factors, please refer to Volume 3: Causes and Impacts of Harms to Children Online which includes the draft Children's Register of Risks.	• We strongly agree that risk assessments should, as far as possible, be based on relevant evidence on the risk of harm on the service. • We welcome the ability to assess the risk level for a given harm as "negligible" where it is not possible for a harm to take place by means of the service. This rightfully recognises the fact that many in-scope services will lack many of the functionalities that Ofcom has identified as risk factors, and so should make the risk assessment process less burdensome for these services. However, we disagree with Ofcom's proposal for services to consider that the impact of harm is likely to be medium or high if they exceed certain child user thresholds. Ofcom's assessment that "the higher the number of children, and greater number of children in vulnerable age groups, the greater the potential impact from encountering any kind of harmful content" (4.49) would not apply to travel search services like Skyscanner given the type of content such services present and the limited search functionality of the service. We appreciate Ofcom's statement that the child user threshold in the Risk Level Table "is only one of various risk factors that services should consider as they determine their risk level and how best to mitigate it, and that in some instances it may be a weak indicator of risk levels." (12.49). In line with this position, we advocate for stronger assurance that the number of users of a service will not be a factor where the nature of the service is such that it poses little or no risk to children. Question 21 The Children's Search Risk Profile is a helpful means of allowing services to quickly identify their risk factors. We welcome the inclusion of service type as a risk factor, and Ofcom's assessment that VSS are less likely to present content that is harmful to children. However, the Children's Search Risk Profile (similarly to the Illegal Content Search Risk Profile, as per our answer to question 8 in the Illegal Harms Consultation) could be further clarified for VSS as follows: • There is no guidance, as far as we can tell, in the Children's Register on how search services are expected to consider the demographics of their

Question	Your response
	user base (particularly their protected characteristics, their media literacy levels, or their mental health) when assessing the risk of each type of illegal harm when a services does not collect such data, or where the vast majority of users do not create an account. • With regards to the commercial profile risk factor, it would be helpful for Ofcom to provide some steer on what it considers to be "low capacity" and "early-stage" (or, if this is provided somewhere, for this information to also be provided in the Risk Profile itself). Ofcom should be aiming for services to be able to comply as easily as possible, without having to sift through multiple guidance documents when carrying out a risk assessment. • As noted below to question 38, it could also be made clearer that limited search prediction/personalisation is not considered a risk factor (for example, if search predictions are limited to departure airports/destination cities etc).

Volume 5 – What should services do to mitigate the risk of online harms

Our proposals for the Children's Safety Codes (Section 13)

Question	Your response
Proposed measures 22. Do you agree with our proposed package of measures for the first Children's Safety Codes? a) If not, please explain why. **Evidence gathering for future work.** 23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration? a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results from trialling or testing of measures. 24. Are there other areas in which we should consider potential future	Confidential? – N Question 22 We welcome the alignment between the Children's Safety Codes and Illegal Content Safety Codes. We also strongly support the decision to reserve most code measures to large general search services or any other multi-risk search service. In our answers to questions 38 and 46 below we have provided feedback on specific codes. There is currently a discrepancy between which services Ofcom has recommended measure PCS C6 apply to in its table summary of the Children's Safety Code and explanation of the measure in A8. The summary states that the measure applies to services that are large general search services or multi-risk in relation to content that is harmful to children, whereas the table summary states

Question	Your response
measures for the Children's Safety Codes? a) If so, please explain why and provide supporting evidence.	that the measure applies to large services or multi-risk services.

Developing the Children's Safety Codes: Our framework (Section 14)	
25. Do you agree with our approach to developing the proposed measures for the Children's Safety Codes? a) If not, please explain why. 26. Do you agree with our approach and proposed changes to the draft Illegal Content Codes to further protect children and accommodate for potential synergies in how systems and processes manage both content harmful to children and illegal content? a) Please explain your views. 27. Do you agree that most measures should apply to services that are either large services or smaller services that present a medium or high level of risk to children? 28. Do you agree with our definition of 'large' and with how we apply this in our recommendations? 29. Do you agree with our definition of 'multi-risk' and with how we apply this in our recommendations? 30. Do you agree with the proposed measures that we recommend for all services, even those that are small and low-risk?	Confidential? – N Question 27 As mentioned, Skyscanner disagrees with the argument that most measures should be placed on large services simply because they are large. As such, we welcome Ofcom's decision not to take a one-size-fits-all approach to proposing which providers measures should apply to (14.50). We appreciate Ofcom's decision to consider size of a service as only one criterion among others. We believe that Ofcom should differentiate between services that pose medium and high-risk and propose differing duties for each. While we understand that Ofcom intends to target specific risk factors by proposing measures for search services that have medium or high risk for at least two kinds of content harmful to children, we would advise Ofcom to ensure that it targets it proposals more specifically to services based on risk. If some services pose a medium risk and other services pose a high risk, we do not see the argument in favour of imposing the same duties on the former as on the latter – this does not represent a proportionate approach. The most burdensome measures should apply to the services that pose the largest risks to children, with size a secondary consideration. Question 28 Yes, with the caveat that it is important Ofcom recognises throughout its guidance and in codes of practice that size, on its own, does not always increase the risk of users encountering content harmful to children. For that reason, we strongly welcome the overall approach taken by Ofcom to not recommend several measures for large VSS simply because they are large. This approach is evidence-based and proportionate, and we note that it is not one that has been taken in other jurisdictions. Question 30 Please refer to our answers below to questions 38 and 46 in which we share feedback on measures that are proposed for all services likely to be accessed by children.

Age assurance measures (Section 15)	
31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures AA1-6? Please provide any information or evidence to support your views. a) Are there any cases in which HEAA may not be appropriate and proportionate? b) In this case, are there alternative approaches to age assurance which would be better suited? 32. Do you agree with the scope of the services captured by AA1-6? 33. Do you have any information or evidence on different ways that services could use highly effective age assurance to meet the outcome that children are prevented from encountering identified PPC, or protected from encountering identified PC under Measures AA3 and AA4, respectively? 34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services? a) Please provide any supporting information or evidence in support of your views. 35. Do you have any information or evidence on other ways that services could consider different age groups when using age assurance to protect children in age groups judged to be at risk of harm from encountering PC?	Confidential? – Y / N
Content moderation U2U (Section 16)	

36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. 37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes? a) Please provide any arguments and supporting evidence.	Confidential? – Y / N

Search moderation (Section 17)

38. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views. 39. Are there additional steps that services take to protect children from the harms set out in the Act? a) If so, how effective are they? 40. Regarding Measure SM2, do you agree that it is proportionate to preclude users believed to be a child from turning the safe search settings off? The use of Generative AI (GenAI), see Introduction to Volume 5, to facilitate search is an emerging development, which may include where search services have integrated GenAI into their functionalities, as well as where standalone GenAI services perform search functions. There is currently limited evidence on how the use of GenAI in search services may affect the implementation of the safety measures as set out in this code. We welcome further evidence from stakeholders on the following questions and please provider arguments and evidence to support your views: 41. Do you consider that it is technically feasible to apply the proposed code measures in respect of GenAI	Confidential? – N Question 38 We would like to reiterate the feedback we shared in our submission to the Illegal Harms consultation (specifically our answer to question 19) regarding Ofcom's proposed code for services to have a search moderation function designed to downrank and/or blur content. We would welcome updated codes relating to search moderation that reflect the fact that VSS do not "deindex" or "downrank" content, due to the fundamentally different way in which they operate compared to general search services. Given our control over the search results we present, for example, we are easily able to remove any content that is deemed to be illegal or in breach of our terms of service when we become aware of it. We recommend that Ofcom updates relevant guidance to confirm that other forms of removal beyond deindexing are acceptable.

functionalities which are likely to perform or be integrated into search functions?	
42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions?	

User reporting and complaints (Section 18)	
43. Do you agree with the proposed user reporting measures to be included in the draft Children's Safety Codes? a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response. 44. Do you agree with our proposals to apply each of Measures UR2 (e) and UR3 (b) to all services likely to be accessed by children for all types of complaints? a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response. 45. Do you agree with the inclusion of the proposed changes to Measures UR2 and UR3 in the Illegal Content Codes (Measures 5B and 5C)?	Confidential? – Y / N

a) Please provide any arguments and supporting evidence.	

Terms of service and publicly available statements (Section 19)	
46. Do you agree with the proposed Terms of Service / Publicly Available Statements measures to be included in the Children's Safety Codes? a) Please confirm which proposed measures your views relate to and provide any arguments and supporting evidence. b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response. 47. Can you identify any further characteristics that may improve the clarity and accessibility of terms and statements for children? 48. Do you agree with the proposed addition of Measure 6AA to the Illegal Content Codes? a) Please provide any arguments and supporting evidence.	Confidential? – N Question 46 Services might find it difficult to comply with Ofcom's proposed measure to have publicly available statements that are clear and accessible to children. We welcome Ofcom's recognition that, "while steps can be taken to make these documents clearer and more accessible, they are contractual in nature and do not easily lend themselves to being child friendly" (19.9). Ofcom should therefore clarify that, as long as terms of service and publicly available statements are legible and do not intentionally obfuscate the subject, they will be deemed compliant.
Recommender systems (Section 20)	
49. Do you agree with the proposed recommender systems measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence. b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.	Confidential? – Y / N

50. Are there any intervention points in the design of recommender systems that we have not considered here that could effectively prevent children from being recommended primary priority content and protect children from encountering priority and non-designated content?	
51. Is there any evidence that suggests recommender systems are a risk factor associated with bullying? If so, please provide this in response to Measures RS2 and RS3 proposed in this chapter.	
52. We plan to include in our RS2 and RS3, that services limit the prominence of content that we are proposing to be classified as non-designated content (NDC), namely depressive content and body image content. This is subject to our consultation on the classification of these content categories as NDC. Do you agree with this proposal? Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3. • Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3.	
User support (Section 21)	
53. Do you agree with the proposed user support measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence. b) If you responded to our Illegal harms consultation and this is relevant to your response here, please signpost	Confidential? – Y / N

to the relevant parts of your prior response.	

Search features, functionalities and user support (Section 22)	
54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views. 55. Do you have additional evidence relating to children's use of search services and the impact of search functionalities on children's behaviour? 56. Are there additional steps that you take to protect children from harms as set out in the Act? a) If so, how effective are they? As referenced in the Overview of Codes, Section 13 and Section 17, the use of GenAI to facilitate search is an emerging development and there is currently limited evidence on how the use of GenAI in search services may affect the implementation of the safety measures as set out in this section. We welcome further evidence from stakeholders on the following questions and please provide arguments and evidence to support your views: 57. Do you consider that it is technically feasible to apply the proposed codes measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions? Please provide arguments and evidence to support your views.	Confidential? – Y / N

Combined Impact Assessment (Section 23)	
58. Do you agree that our package of proposed measures is proportionate, taking into account the impact on children's safety online as well as the implications on different kinds of services?	Confidential? – Y / N
Statutory tests (Section 24)	
59. Do you agree that our proposals, in particular our proposed recommendations for the draft Children's Safety Codes, are appropriate in the light of the matters to which we must have regard? a) If not, please explain why.	Confidential? – Y / N
Annexes **Impact Assessments (Annex A14)**	
60. In relation to our equality impact assessment, do you agree that some of our proposals would have a positive impact on certain groups? 61. In relation to our Welsh language assessment, do you agree that our proposals are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English? a) If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.	Confidential? – Y / N

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