Guidance at a glance

Overview

- 1.1 This document summarises what we are asking service providers¹ to do in <u>A safer life online</u> for women and girls: practical guidance for tech companies ('the draft Guidance') in two tables:
 - Table 1: Foundational steps
 - Table 2: Good practice steps
- 1.2 Each table sets out the nine high-level actions we are asking providers to take to improve the safety of women and girls online, as specified in the draft Guidance. Each row in the tables represents a different step providers can take to meet that action. The steps are grouped under the relevant actions and are listed in the same order as they appear in the draft Guidance itself.

Table 1: Foundational steps

- 1.3 **Table 1 summarises the foundational steps in this draft Guidance.** These foundational steps are included in the relevant Codes measures and risk assessment guidance we have already set out either in final or draft form as part of our work on Illegal Harms and Protection of Children to help providers comply with the corresponding duties. If service providers implement the measures recommended in Codes, services will be treated as complying with the relevant duties. Service providers may choose to comply with their duties in an alternative way that is more appropriate to their circumstances.
- 1.4 The columns in Table 1 provide additional information to help providers implement the foundational steps:
 - **Guidance paragraph:** references the specific paragraph in the draft Guidance that discusses the relevant foundational step in more detail.
 - **Description:** provides a brief explanation of the foundational step.
 - Reference: indicates where the foundational step appears in other Ofcom documents, such as our Illegal Content Codes of Practice and our Draft Protection of Children Codes of Practice
 - Who should implement this: shows how the foundational step applies to different groups of services.
 - **Legal duty:** references the duties from the Online Safety Act 2023 ('the Act') to which each foundational step applies.
 - Status: indicates whether the relevant foundational step is final or at consultation.
- 1.5 Nothing in this document should be taken to affect what is set out in the Illegal Content Codes of Practice and Draft Protection of Children Codes of Practice. In the event of any inconsistency, the original Codes as published prevail.

¹ We refer to the online platforms themselves as 'services', and the legal entity that provides the service as a 'service provider' or 'provider'.

Table 2: Good practice steps

- 1.6 **Table 2 summarises the good practice steps we recommend in this draft Guidance.** The good practice steps include additional ways providers could build on the foundational steps to meet each of the actions and further improve women and girls' online safety. We have not recommended these good practice steps for the purposes of complying with providers' legal duties to date, but we consider that taking these steps may assist providers to demonstrate what they are doing with regard to user safety more broadly.
- 1.7 The columns in Table 2 provide additional information to help providers implement these steps:
 - **Guidance paragraph:** references the specific paragraph in the Guidance that discusses the relevant good practice step in more detail.
 - **Description:** provides a brief explanation of the good practice step.

Table 1: Foundational steps

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
Action 1: Er	sure governance and accor	untability processes addr	ess women and girls' online safety		
	Annual review of risk management activities	Illegal Content Codes of Practice (ICU A1 ² , ICS A1 ³)	ICU A1: Providers of large U2U services ICS A1: Providers of large general search services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)*, Section 21(2)† and (3)† of the Act Search services: Section 27(2), (3), and (5) to (9) Section 31(2)*, Section 32(2)† and (3)† of the Act	Final ⁴
3.11(a)	Annual review of risk management activities	Protection of Children Codes of Practice (PCU A1 ⁵ , PCS A1 ⁶)	PCU A1: Providers of U2U services likely to be accessed by children that are a large service PCS A1: Providers of search services likely to be accessed by children that are a large general search service	U2U services: Section 12(2), 12(3), 12(8)(a) of the Act Search services: Section 29(2), 29(3), 29(4)(a) of the Act	Code measures at consultation ⁷

² The references in this document to Illegal Content Codes of Practice for user-to-users ('U2U') services are taken from the <u>Illegal Content Codes of Practice for user-to-user</u> services. [accessed 12 February 2025].

³ The references in this document to Illegal Content Codes of Practice for search services are taken from the <u>Illegal Content Codes of Practice for search services</u>. [accessed 12 February 2025].

⁴ 'Final' means that these measures are included in Ofcom's draft Illegal Content Codes of Practice as laid before Parliament on 16 December 2024. We expect to issue these and for them to come into force on 17 March 2025, unless either House of Parliament resolves not to approve them.

⁵ The references in this document to Protection of Children Codes of Practice for U2U services are taken from the <u>Protection of Children Code of Practice for U2U services</u>. [accessed 12 February 2025].

⁶ The references in this document to Protection of Children Codes of Practice for U2U services are taken from the <u>Protection of Children Code of Practice for search services</u>. [accessed 12 February 2025].

Where we refer in this document to a Code measure being at consultation or in draft, we recognise that they may be subject to change following the publication of this document and inclusion in this table does not pre-judge Ofcom's final decision.

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Individual accountable for illegal content safety duties and reporting and complaints duties	Illegal Content Codes of Practice (ICU A2, ICS A2)	Providers of all U2U and search services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)* Section 21(2)† and (3)† Search services: Section 27(2), (3), and (5) to (9) Section 31(2)* Section 32(2)† and (3)† of the Act	Final
3.11(b)	Person accountable for the safety duties protecting children and reporting and complaints duties	Protection of Children Codes of Practice (PCU A2, PCS A2)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 12(2), 12(3), 12(8)(a), 12(8)(h) of the Act Search services: Sections 29(2), 29(3), 29(4)(a), 29(4)(f) of the Act	Code measures at consultation
	Written statements of responsibilities	Illegal Content Codes of Practice (ICU A3, ICS A3)	ICU A3: Providers of large or multi-risk U2U services ICS A3: Providers of large general search services or multi-risk services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)* Section 21(2)† and (3)† of the Act Search services: Section 27(2), (3), and (5) to (9) Section 31(2)* Section 32(2)† and (3)† of the Act	Final
3.11(c)	Written statements of responsibilities	Protection of Children Codes of Practice (PCU A3, PCS A3)	PCU A3: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS A3: Providers of search services likely to be accessed by children that are either a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(a), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(a), 29(4)(f) of the Act	Code measures at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Internal monitoring and assurance	Illegal Content Codes of Practice (ICU A4, ICS A4)	Providers of U2U and search services that are large multi-risk services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)* Section 21(2)† and (3)† of the Act Search services: Section 27(2), (3), and (5) to (9) Section 31(2)* Section 32(2)† and (3)† of the Act	Final
3.11(d)	Internal monitoring and assurance	Protection of Children Codes of Practice (PCU A4, PCS A4)	PCU A4: Providers of U2U services likely to be accessed by children that are both a large service and multi-risk in relation to content that is harmful to children PCS A4: Providers of search services likely to be accessed by children that are both a large general search service and multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(a) of the Act Search services: Section 29(2), 29(3), 29(4)(a) of the Act	Code measures at consultation
	Tracking evidence of new and increasing illegal harm	Illegal Content Codes of Practice (ICU A5, ICS A5)	Providers of U2U and search services that are large or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final
3.11(e)	Tracking evidence of new and increasing harm	Protection of Children Codes of Practice (PCU A5, PCS A5)	PCU A5: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS A5: Providers of search services likely to be accessed by children that are either a large general search service or multi-risk in relation to content that is harmful to children	USU services: Section 12(2), 12(3), 12(8)(a) of the Act Search services: Section 29(2), 29(3), 29(4)(a) of the Act	Code measures at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
3.11(f)	Code of conduct regarding protection of users from illegal harm	Illegal Content Codes of Practice (ICU A6, ICS A6)	ICU A6: Providers of U2U services that are large or multi-risk services ICS A6: Providers of search services that are large general search services or multi-risk services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)* Section 21(2)† and (3)† of the Act Search services: Section 27(2), (3), and (5) to (9) Section 31(2)* Section 32(2)† and (3)† of the Act	Final
	Code of conduct regarding protection of children from online harms	Protection of Children Codes (PCU A6, PCS A6)	PCU A6: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS A6: Providers of search services likely to be accessed by children that are either a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(a), 12(8)(h) Search services: Section 29(2), 29(3), 29(4)(a), 29(4)(f) of the Act	Code measures at consultation
2 11(a)	Terms of service: clarity and accessibility	Illegal Content Codes of Practice (ICU G3, ICS G3)	Providers of all U2U and search services	U2U services: Section 10(8) Section 21(3)† of the Act Search services: Section 27(8) Section 32(3)† of the Act	Final
3.11(g)	Terms of service: clarity and accessibility	Protection of Children Codes of Practice (PCU D3, PCS D3)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 12(13) of the Act Search services: Section 29(8) of the Act	Codes measures at consultation
3.11(h)	Compliance training	Illegal Content Codes of Practice (ICU A7, ICS A7)	ICU A7: Providers of U2U services which are large or multi risk services ICS A7: Providers of search services which are large general search services or multi-risk services	U2U services: Section 10(2), (3), and (5) to (9) Section 20(2)* Section 21(2)† and (3)† of the Act Search services: Section 27(2), (3), and (5) to (9) Section 31(2)* Section 32(2)† and (3)† of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Staff compliance training	Protection of Children Codes of Practice (PCU A7, PCS A7)	PCU A7: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS A7: Providers of search services likely to be accessed by children that are either a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(a), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(a), 29(4)(f) of the Act	Code measures at consultation
Action 2: Co	onduct risk assessments tha	at focus on harms to won	nen and girls		
	Risk assessment: Services have a duty to conduct a suitable and sufficient illegal content risk assessment	Risk Assessment Guidance for Service Providers	Providers of all U2U and search services	Sections 9 and 26 of the Act	Final
3.17(a)	Children's risk assessment: Services that are likely to be accessed by children are required to carry out a suitable and sufficient children's risk assessment	Draft Children's Risk Assessment Guidance for Service Providers	Providers of all U2U and search services that are likely to be accessed by children	Sections 11 and 28 of the Act	Guidance at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status			
	Setting internal content policies	Illegal Content Codes of Practice (ICU C3, ICS C2)	ICU C3: Providers of U2U services which are large or multi risk services ICS C2: Providers of search services which are large general search services or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final			
3.17(b)	Setting internal content policies	Protection of Children Codes of Practice (PCU B2, PCS B3)	PCU B2: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS B3: Services likely to be accessed by children that are a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(e), 12(8)(h) of the Act Search services: section 29(2), 29(3), 29(4)(d), 29(4)(e) of the Act	Code measures at consultation			
Action 3: Be	e transparent about wome	n and girls' online safety						
3.25	Publish transparency reports based on requirements laid out in transparency notices issued by Ofcom	<u>Draft Transparency</u> <u>Guidance</u>	All categorised services (see section 95 of the Act)	Section 77 of the Act	Guidance at consultation			
Action 4: Co	Action 4: Conduct abusability evaluations and product testing							
4.18(a)	Product testing	Risk Assessment Guidance for Service Providers	Should be considered by large service providers and those who have identified multiple specific risk factors for a kind of illegal content	U2U services: Section 9 of the Act Search services: Section 26 of the Act	Final			

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Product testing	Draft Children's Risk Assessment Guidance for Service Providers	Should be considered by large service providers and those who have identified multiple specific risk factors for a kind of primary priority content, a kind of priority content, or non-designated content.	U2U services: Section 11 of the Act Search services: Section 28 of the Act	Guidance at consultation
	Significant change risk assessment	Risk Assessment Guidance for Service Providers	Providers of all U2U and search services	U2U services: Section 9 of the Act Search services: section 26 of the Act	Final
4.18(b)	Significant change risk assessment	Draft Children's Risk Assessment Guidance for Service Providers	Providers of all U2U and search services that are likely to be accessed by children	U2U services: section 11 of the Act Search services: section 28 of the Act	Guidance at consultation
4.18(c)	Collection of safety metrics during on- platform testing of content recommender systems	Illegal Content Codes of Practice (ICU E1)	Providers of U2U services that conduct on- platform testing of recommender systems and are at medium or high risk of two or more specified kinds of illegal harm	Section 10(2) of the Act	Final
Action 5: Se	et safer defaults				
4.26(a)	Safety defaults for child users	Illegal Content Codes of Practice (ICU F1)	Providers of U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at high risk of grooming. Providers of large U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at medium risk of grooming	Section 10(2) of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
4.26(b)	Invitation to group chats	Protection of Children Codes of Practice (PCU G4)	Providers of U2U services likely to be accessed by children where it has a group messaging functionality and there is a medium or high risk of one or more abusive content, bullying content, content inciting hatred, eating disorder content, pornography content and violent content	Section 12(2), 12(3), 12(8)(f) of the Act	Codes measure at consultation
4.26(c)	Support for child users	Illegal Content Codes of Practice (ICU F2)	Providers of U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at high risk of grooming. Providers of large U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at medium risk of grooming	Section 10(2) of the Act	Final
4.26(d)	Filtering out primary priority content for users believed to be child users	Protection of Children (PCS B2)	All services likely to be accessed by children that are a large general search service	Section 29(2), 29(3), 29(4)(d), 29(4)(e) of the Act	Codes measure at consultation
Action 6: Ro	educe the circulation of cor	ntent depicting, promotin	g or encouraging online gender-based harm		
4.37(a)	Using hash matching to detect and remove Child Sexual Abuse Material (CSAM)	Illegal Content Codes of Practice (ICU C9)	Providers of large U2U services that are at medium or high risk of image based CSAM. Services that are at high risk of image based CSAM and (a) have more than 700,000 monthly active United Kingdom users or (b) are filestorage and file-sharing services	Section 10(2) and (3) of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
4.37(b)	Limiting the prominence of priority content and content likely to be priority content in the recommender feeds of child users	Protection of Children Codes of Practice (PCU F2)	Providers of U2U services likely to be accessed by children where the service has a recommender system and there is a medium or high risk of one or more kinds of priority content (other than bullying content), [OR one or more kinds of priority content (other than bullying content), body image content or depressive content]	Section 12(3), 12(8)(b) of the Act	Codes measure at consultation
	Excluding content likely to be primary priority content from the recommender feeds of child users	Protection of Children Codes of Practice (PCU F1)	Providers of U2U services likely to be accessed by children where the service has a recommender system and there is medium or high risk of one or more kinds of primary priority content	Section 12(3), 12(8)(b) of the Act	Codes measure at consultation
	Having a search moderation function designed to action illegal content	Illegal Content Codes of Practice (ICS C1)	Providers of all search services	Section 27(2) and (3) Section 32(2)(b)† of the Act	Final
4.37(c)	Having a search moderation function designed to downrank and/or blur content that is harmful to children	Protection of Children Codes of Practice (PCS B1)	Providers of search services likely to be accessed by children.	Section 29(2), 29(3), 29(4)(d) of the Act	Codes measure at consultation
	Removing listed CSAM URLs from search results	Illegal Content Codes of Practice (ICS C7)	Providers of all general search services	Section 27(2) and (3) of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
4.37(d)	Provision of CSAM content warnings	Illegal Content Codes of Practice (ICS F2)	Providers of large general search services	Section 27(2) and (3) of the Act	Final
	Use of highly effective age assurance to prevent children from accessing the entire service	Protection of Children Codes of practice (PCU H2)	Providers of U2U services likely to be accessed by children whose principal purpose is the hosting or dissemination of one or more kinds of primary priority content	Section 12(3)(a), 12(4), 12(6) of the Act	Codes measures at consultation
	Use of highly effective age assurance to prevent children from accessing the entire service	Protection of Children Codes of practice (PCU H3)	Providers of U2U services likely to be accessed by children whose principal purpose is the hosting or dissemination of one or more kinds of priority content	Section 12(2), 12(3), 12(7) of the Act	Codes measures at consultation
4.37(e)	Use of highly effective age assurance to ensure children are prevented from encountering primary priority content	Protection of Children Codes of Practice (PCU H4)	Providers of U2U services likely to be accessed by children that do not meet the criterion in PCU H2.1 and whose terms of service do not prohibit every kind of primary priority content	Section 12(3)(a), 12(4), 12(6) of the Act	Codes measures at consultation
	Use of highly effective age assurance to ensure children are prevented from encountering priority content	Protection of Children Codes of Practice (PCU H5)	Providers of U2U services likely to be accessed by children that do not meet the criteria in PCU H3.1 and whose terms of service do not prohibit every kind of priority content and are medium or high risk of priority content that they do not prohibit	Section 12(2), 12(3), 12(7) of the Act	Codes measures at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Use of highly effective age assurance to apply relevant recommender system measures relating to primary priority content	Protection of Children Codes of Practice (PCU H6)	Providers of U2U services likely to be accessed by children that have a recommender system and are medium or high risk of primary priority content	Section 12(2), 12(3), 12(4), 12(6) of the Act	Codes measures at consultation
	Use of highly effective age assurance to apply relevant recommender system measures relating to priority content and nondesignated content	Protection of Children Codes of Practice (PCU H7)	Providers of U2U services likely to be accessed by children that have a recommender system and are medium or high risk of priority content other than bullying content	Section 12(2), 12(3), 12(7) of the Act	Codes measures at consultation
	Signposting child users to support	Protection of Children Codes of Practice (PCU E3)	Providers of U2U services likely to be accessed by children where there is a medium or high risk of bullying content, eating disorder content, self-harm content or suicide content	Section 12(2), 12(3), 12(8)(g) of the Act	Codes measure at consultation
4.37(f)	Provision of suicide crisis prevention information	Illegal Content Codes of Practice (ICS F3)	Providers of large general search services	Section 27(2) and (3) of the Act	Final
	Provision of suicide, self-harm and eating disorder crisis prevention information	Protection of Children Codes of Practice (PCS E3)	Providers of services likely to be accessed by children that are a large general search service	Section 29(2), 29(3) of the Act	Codes measure at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status				
Action 7: G	Action 7: Give users better control over their experiences								
5.14(a)	User blocking and muting	Illegal Content Codes of Practice (ICU J1)	Providers of large U2U services that are at medium or high risk of one or more specified kinds of illegal harm, have user profiles and have at least one specified functionality	Section 10(2) of the Act	Final				
	User blocking and muting	Protection of Children Codes of Practice (PCU G1)	Providers of U2U services likely to be accessed by children where it has user profiles and relevant functionalities and there is a medium or high risk of one or more of abusive content, bullying content, content inciting hatred and violent content	Section 12(2), 12(3), 12(8)(f) of the Act	Codes measure at consultation				
	Disabling comments	Illegal Content Codes of Practice (ICU J2)	Providers of large U2U services that are at medium or high risk of one or more specified kinds of illegal harm and enable users to comment on content.	Section 10(2) of the Act.	Final				
5.14(b)	Disabling comments	Protection of Children Codes of Practice (PCU G2)	Providers of U2U services likely to be accessed by children where it has a functionality of commenting on content and there is a medium or high risk of one or more of abusive content, bullying content, content inciting hatred and violent content	Section 12(2), 12(3), 12(8)f) of the Act	Codes measure at consultation				

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
5.14(c)	Provision of negative feedback on recommended content	Protection of Children Codes of Practice (PCU F3)	Providers of U2U services likely to be accessed by children that are a large service where the service has a recommender system and there is a medium or high risk of two or more kinds of primary priority content or priority content (other than bullying content) [OR two or more kinds of primary priority content or priority content (other than bullying ⁸ content), body image content or depressive content]	Section 12(2), 12(3), 12(8)(b) and 12(8)(f) of the Act	Codes measure at consultation
5.14(d)	Invitation to group chats	Protection of Children Codes of Practice (PCU G4)	Providers of U2U services likely to be accessed by children where it has a group messaging functionality and there is a medium or high risk of one or more abusive content, bullying content, content inciting hatred, eating disorder content, pornography content and violent content	Section 12(2), 12(3), 12(8)(f) of the Act	Codes measure at consultation
5.14(e)	Support for child users	Illegal Content Codes of Practice (ICU F2)	Providers of U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at high risk of grooming. Providers of large U2U services which have an existing means of determining the age or age range of a particular user and have specified functionalities, and are at medium risk of grooming	Section 10(2) of the Act	Final

⁸ Typographical errors in <u>Protection of Children Code of Practice for user-to-user services</u> have been corrected for the purpose of this table.

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Provision of information to child users when they restrict interactions with other accounts or content	Protection of Children Codes of Practice (PCU E2)	Providers of U2U services likely to be accessed by children that are a large service and multi-risk in relation to content that is harmful to children	Section 12(2), 12(3), 12(8)(g) of the Act	Codes measure at consultation
5.15(f)	Provision of age- appropriate user support materials for children	Protection of Children Codes of Practice (PCU E1, PCS E1)	PCU E1: Providers of U2U services likely to be accessed by children that are multi-risk in relation to content that is harmful to children PCS E1: Providers of search services likely to be accessed by children that are multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(g) of the Act Search services: Section 29(2), 29(3), 29(4)(e) of the Act	Codes measures at consultation
	Signposting child users to support	Protection of Children Codes of Practice (PCU E3)	Providers of U2U services likely to be accessed by children where there is a medium or high risk of bullying content, eating disorder content, self-harm content or suicide content	Section 12(2), 12(3), 12(8)(g) of the Act	Codes measure at consultation
Action 8: Eı	Action 8: Enable users who experience online gender-based harms to make reports				
5.19(a)	Enabling complaints	Illegal Content Codes of Practice (ICU D1, ICS D1)	Providers of all U2U and search services	U2U services: Section 20(2)* Section 21(2)(a) of the Act Search services: Section 31(2)* Section 32(2)(a)† of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Enabling complaints	Protection of Children Codes of Practice (PCU C1, PCS C1)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 20(2),20(4), 21(2), 21(5) ⁹ of the Act Search services: Section 31(2),31(4), 32(2), 32(5) of the Act	Codes measures at consultation
5.19(b)	Having easy to find, easy to access and easy to use complaints systems and processes	Illegal Content Codes of Practice (ICU D2, ICS D2)	Providers of all U2U and search services	U2U services: Section 20(2)* Section 21(2)(c)† of the Act Search services: Section 31(2)* Section 32(2)(c)† of the Act	Final
	Having an easy to find, easy to access and easy to use complaints system	Protection of Children Codes of Practice (PCU C2, PCS C2)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 21(2), 21(5) of the Act Search services: Section 32(2), 32(5) of the Act	Codes measures at consultation
5.19(c)	Appropriate action – sending indicative timeframes	Illegal Content Codes of Practice (ICU D4, ICS D3)	ICU D4: Providers of U2U services that are large or at medium or high risk of any kind of illegal harm. ICS D3: Providers of large general search services or services at medium or high risk of any kind of illegal harm	U2U services: Section 21(2)(b)† and (c)† of the Act Search services: Section 32(2)(c)† of the Act	Final

⁹ Typographical errors in <u>Protection of Children Code of Practice for user-to-user services</u> have been corrected for the purpose of this table.

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Appropriate action – sending further information about how the complaint will be handled	Illegal Content Codes of Practice (ICU D5, ICS D4)	ICU D5: Providers of U2U services likely to be accessed by children that are either large or at medium or high risk of any kind of illegal harm ICS D4: Providers of large general search services or services at medium or high risk of any kind of illegal harm, each that are likely to be accessed by children	U2U services: Section 21(2)(b)† and (c)† of the Act Search services: Section 32(2)(b)† and (c)† of the Act	Final
	Appropriate action – sending information about how the complaint will be handled	Protection of Children Codes of Practice (PCU C4, PCS C4)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 21(2), 21(5) of the Act Search services: Section 32(2), 32(5) of the Act	Codes measures at consultation
	Opt-out from communications following a complaint	Illegal Content Codes of Practice (ICU D6, ICS D5)	ICU D6: Providers of U2U services that are large or at medium or high risk of any kind of illegal harm ICS D5: Providers of large general search services or services at medium or high risk of any kind of illegal harm	U2U services: Section 21(2)(b)† of the Act Search services: Section 32(2)(b)† of the Act	Final
5.19(d)	Reporting and removal of predictive search suggestions	Illegal Content Codes of Practice (ICS F1)	Providers of large general search services that use a predictive search functionality	Section 27(2) and (3) of the Act	Final
	Reporting and removal of predictive search suggestions	Protection of Children Codes of Practice (PCS E2)	Providers of search services likely to be accessed by children that are a large general search service and use a predictive search functionality	Section 29(2), 29(3) of the Act	Codes measure at consultation

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status	
Action 9: Ta	Action 9: Take appropriate action when online gender-based harm occurs					
	Having a content moderation function that allows for the swift take down of illegal content	Illegal Content Codes of Practice (ICU C2)	Providers of all U2U services	Section 10(2) and (3) Section 21(2)(b)† of the Act	Final	
5.24(a)	Having a content moderation function that allows for swift action against content harmful to children	Protection of Children Codes of Practice (PCU B1)	Providers of U2U services likely to be accessed by children	Section 12(2), 12(3), 12(8)(e) of the Act	Codes measure at consultation	
	Content moderation: Performance targets	Illegal Content Codes of Practice (ICU C4, ICS C3)	ICU C4: Providers of U2U services which are large or multi-risk services ICS C3: Providers of large general search services or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final	
5.24(b)	Content moderation: Performance targets	Protection of Children Codes of Practice (PCU B3, PCS B4)	PCU B3: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS B4: Providers of search services likely to be accessed by children that are a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(e), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(d) of the Act	Codes measures at consultation	

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Content moderation: Prioritisation	Illegal Content Codes of Practice (ICU C5, ICS C4)	ICU C5: Providers of U2U services which are large or multi-risk services ICS C4: Providers of large general search services or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final
5.24(c)	Content moderation: Prioritisation	Protection of Children Codes of Practice (PCU B4, PCS B5)	PCU B4: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS B5: Providers of search services likely to be accessed by children that are a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(e), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(d) of the Act	Codes measures at consultation
5.24(d)	Content moderation: Resourcing	Illegal Content Codes of Practice (ICU C6, ICS C5)	ICU C6: Providers of U2U services which are large or multi-risk services ICS C5: Providers of large general search services or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Content moderation: Resourcing	Protection of Children Codes of Practice (PCU B5, PCS B6)	PCU B5: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS B6 — Providers of search services likely to be accessed by children that are a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(e), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(d), 29(4)(f) of the Act	Codes measures at consultation
	Provision of training and materials to individuals working in content moderation (non-volunteers)	Illegal Content Codes of Practice (ICU C7, ICS C6)	ICU C7: Providers of U2U services which are large or multi-risk services ICS C6: Providers of large general search services or multi-risk services	U2U services: Section 10(2) and (3) of the Act Search services: Section 27(2) and (3) of the Act	Final
	Provision of training and materials to paid moderators	Protection of Children Codes of Practice (PCU B6, PCS B7)	PCU B6: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS B7: Providers of search services likely to be accessed by children that are a large general search service or multi-risk in relation to content that is harmful to children	U2U services: Section 12(2), 12(3), 12(8)(e), 12(8)(h) of the Act Search services: Section 29(2), 29(3), 29(4)(d), 29(4)(f) of the Act	Codes measures at consultation
5.24(e)	Appropriate action for relevant complaints about suspected illegal content	Illegal Content Codes of Practice (ICU D7, ICS D6)	Providers of all U2U and search services	U2U services: Section 10(3) Section 21(2)(b)† of the Act Search services: Section 27(3) Section 32(2)(b)† of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Appropriate action for relevant complaints about content considered harmful to children	Protection of Children Codes of Practice (PCU C5, PCS C5)	PCU C5: Providers of U2U services likely to be accessed by children PCS C5: Providers of search services likely to be accessed by children	U2U services: Section 21(2), 21(5) Search services: Section 32(2), 32(5)	Codes measures at consultation
	Appropriate action for relevant complaints which are appeals – determination (large general or multi-risk services)	Illegal Content Codes of Practice (ICU D8, ICS D7)	ICU D8: Providers of U2U services which are large or multi-risk services ICS D7: Providers of search services which are large general search services or multi-risk services	U2U services: Section 21(2)(b)† of the Act Search services: Section 32(2)(b)† of the Act	Final
5.24(f)	Appropriate action for relevant complaints which are appeals (services that are large or multi-risk in relation to content that is harmful to children)	Protection of Children Codes of Practice (PCU C6, PCS C6)	PCU C6: Providers of U2U services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children PCS C6: Providers of search services likely to be accessed by children that are either a large service or multi-risk in relation to content that is harmful to children	U2U services: Section 21(2), 21(5) of the Act Search services: Section 32(2), 32(5) of the Act	Codes measures at consultation
	Appropriate action for relevant complaints which are appeals – action following determination	Illegal Content Codes of Practice (ICU D10, ICS D9)	Providers of all U2U and search services	U2U services: Section 21(2)(b)† of the Act Search services: Section 32(2)(b)† of the Act	Final

Guidance paragraph	Description	Reference	Who should implement this	Legal duty	Status
	Appropriate action for relevant complaints which are appeals – action following determination	Protection of Children Codes of Practice (PCU C8, PCS C8)	Providers of all U2U and search services likely to be accessed by children	U2U services: Section 21(2), 21(5) of the Act Search services: Section 32(2), 32(5) of the Act	Codes measures at consultation

^{*} So far as it relates to illegal content

[†] So far as relating to the complaints set out in section 21(4) of the Act (U2U services) or 32(4) of the Act (search services)

Table 2: Good practice steps

Guidance paragraph	Description				
Action 1: E	Action 1: Ensure governance and accountability processes address women and girls' online safety				
3.13(a)	Set policies that are designed to tackle forms of online gender-based harms that are prevalent on the service				
3.13(b)	Ensure that governance and decision-making consider intersectionality of online harms				
3.13 (c)	Consult with subject matter experts, particularly those with experience of supporting survivors of gender-based harms, when setting policies and terms of service.				
3.13(d)	Train staff involved in setting policies or governance and decision making on online gender-based harms and safety-by-design				
3.13(e)	Create a media literacy-by-design policy to promote critical and informed service use ¹⁰				
3.13(f)	Establish an oversight mechanism for trust and safety decisions				
Action 2: Co	onduct risk assessments that focus on harms to women and girls				
3.19(a)	Use external assessors for monitoring the threat landscape, including local partners with regional and cultural knowledge, and international partners with expertise in highly contextual risk areas such as cyberstalking and controlling or coercive behaviour				
3.19(b)	Engage with survivors and victims to better understand their experiences				
3.19(c)	Conduct user surveys to better understand users' preferences and experiences of risk				

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¹⁰ Further information on the Media Literacy principles referenced in this document can be found in our <u>Best Practice Design Principles for Media Literacy.</u>

Guidance paragraph	Description
3.19(d)	Conduct an impact assessment alongside other risk assessments to assess impacts on self-expression, freedom from discrimination, and privacy, especially for those with protected characteristics
Action 3: Be	e transparent about women and girls' online safety
3.26(a)	Share information about the prevalence of different forms of online gender-based harms and the effectiveness of measures in place to address them
3.26(b)	Provide more detail about posts flagged by automated content moderation, active bystanders who are not targeted by abuse but report content to support others, and the targeted users themselves
3.26(c)	Exercise caution in sharing information that perpetrators could exploit to circumvent safety measures, as well as details of specific incidents that could identify an individual or group, including location, sexual orientation, religion or other sensitive information that could put them at risk.
Action 4: Co	onduct abusability evaluations and product testing
4.20(a)	Use red teaming for abusability testing
4.20(b)	Work with experts with direct or relevant experience engaging with and understanding perpetrator behaviours
4.20(c)	Use personas to explore how different users may experience a feature
4.20(d)	Adhere to the principles on monitoring and evaluating features in the <u>Best Practice Design Principles for Media Literacy</u> .
Action 5: Se	et safer defaults
4.29(a)	Set strong and customisable defaults around user interaction
4.29(b)	Set strong and customisable defaults around user privacy
4.29(c)	Combine relevant safety and privacy settings into 'bundles'
4.29(d)	Strengthen account security with two- or multi-factor authentication feature

Guidance paragraph	Description
4.29(e)	Provide information about account access
4.29(f)	Identify optimal frequency and timing and give users regular reminders for reviewing or updating privacy and security settings
Action 6: Re	educe the circulation of content depicting, promoting or encouraging online gender-based harm
4.40(a)	Introduce deliberate friction through nudges at the point of upload
4.40(b)	Allow users to verify their identity
4.41(a)	Use hash matching to prevent uploads of known intimate image abuse
4.41(b)	Implement timeout features to users who repeatedly attempt to abuse a service to perpetrate online gender-based harms
4.41(c)	Require consent from those depicted in intimate content prior to uploading where adult content is allowed on a service to prevent intimate image abuse, including deepfakes
4.41(d)	Implement prompt and output filters for GenAl models
4.42(a)	Deprioritise harmful content in recommender algorithms to reduce its visibility and reach
4.42(b)	Remove links to sites known to host nonconsensual images, or to services such as nudification apps
4.42(c)	De-monetise sites that promote online-gender based harm
4.42(d)	Blur nudity and harmful content
4.42(e)	Scan for duplicates of explicit non-consensual fake content and delist them from search
4.43	Use automated content moderation to scan, identify, and filter online gender-based violence content
Action 7: G	ve users better control over their experiences
5.15(a)	Allow users to delete of change visibility settings of content they upload, including content uploaded in the past.

Guidance paragraph	Description
5.15(b)	Provide users with tools to block and mute multiple accounts simultaneously
5.15(c)	Allow users to filter out content from all users who have not completed identity verification
5.15(d)	Provide users with greater control over what content is recommended to them by content recommender systems.
5.15(e)	Allow users to signal what kind of content they do not want to see, and what kind of content they want to see more of
5.15(f)	Signpost users to supportive information which addresses specific harms such as domestic abuse or image-based sexual abuse
Action 8: Enable users who experience online gender-based harms to make reports	
5.20(a)	Provide a 'quick exit button' throughout the reporting process which immediately takes the user out of the reporting system
5.20(b)	Allow users to track and manage their reports and tailor their experience throughout the complaints process
5.20(c)	Allow users to give feedback to the service provider on their reporting process
5.20(d)	Establish a trusted flagger programme in partnership with organisations that have expertise in gender-based harm
5.20(e)	Allow users to report incidents of abuse, including abuse that happened on another service or offline.
5.20(f)	Adopt the principles on user-centric design and timely interventions in the Best-Practice Design Principles for Media Literacy
Action 9: Take appropriate action when online gender-based harm occurs	
5.25(a)	Take action against users who continually violate a service's terms of service
5.25(b)	Add fact-checking and labelling to content can be a useful tool to address gendered disinformation
5.25(c)	Add watermarks and metadata

Guidance paragraph	Description
5.25(d)	Identify and prevent the creation of new accounts by banned users
5.25(e)	Send high risk and highly contextual user reports of gender-based harms for review by specifically trained moderators
5.25(f)	Hide potentially harmful content while it is assessed in content moderation
5.25(g)	Create dedicated reporting and review channels for online gender-based harms