Protecting children from harms online
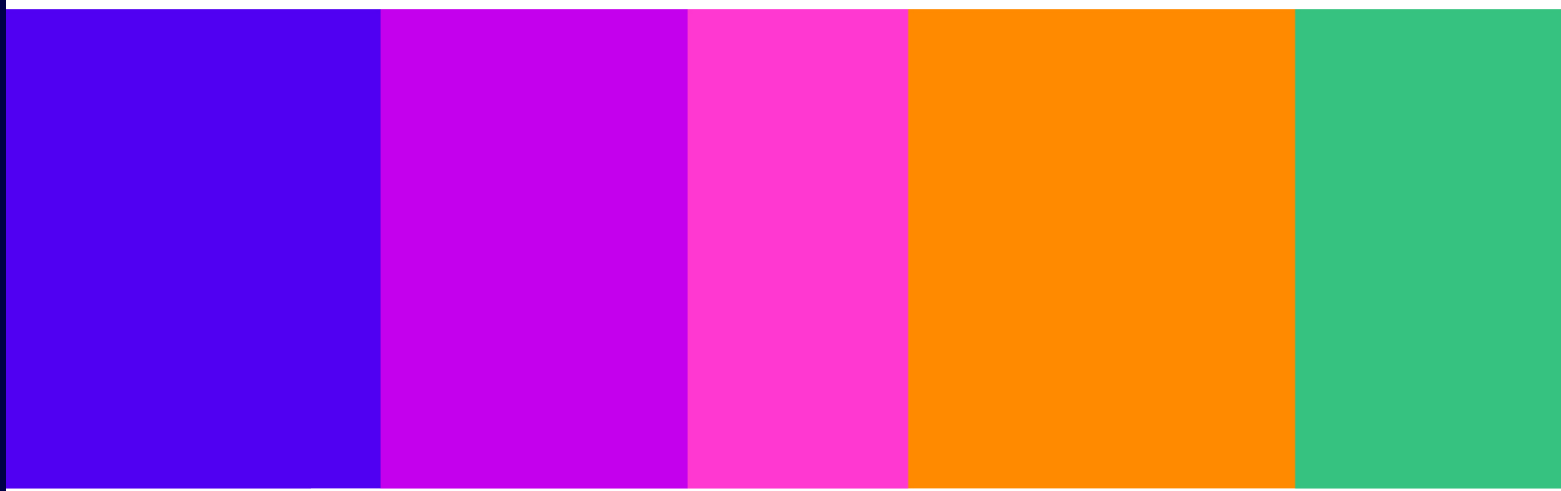
Codes at a glance

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1.1   This document summarises the measures in our Protection of Children Codes of Practice for user-to-user and search services likely to be accessed by children and which services they apply to. The measures are discussed in detail in Volume 4 of this statement.

1.2   The below tables set out the measures included in the Codes which apply to providers of user-to-user and search services likely to be accessed by children and who they apply to.[1]

1.3   For some of the measures, whether the measure applies to a provider of a particular service will depend on the level of risk on the service, whether it meets other specific risk criteria (e.g., having relevant functionalities), and/or the size of the service.

1.4   We reference 'large services' for both user-to-user and search measures. We define a service as large where it has an average user base greater than 7 million monthly active UK users, approximately equivalent of 10% of the UK population.

1.5   We also reference 'multi-risk' for content harmful to children, which refers to a service which the provider has assessed as being medium or high risk for at least two different kinds of content harmful to children. This, and any other criteria related to risk levels, depends on the outcome of a service's children's risk assessment as set out in the Children's Risk Assessment Guidance.[2]

1.6   For search services, some of the measures distinguish between two kinds of search service:

- General search services, which operate by means of an underlying index of URLs and enable users to search the internet by inputting search requests; and

- Vertical search services, which enable users to search for specific topics, products or services offered by third-party operators. These operate by live querying of selected websites using an Application Programming Interface (API) or equivalent means.[3]

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[1] Please note the following tables are intended to be summaries of the Codes measures only. For detail on the measures please see the relevant statement chapter and Protection of Children Codes of Practice for user-to-user and for search services. Nothing in these tables should be taken to affect what is set out in the statement or the user-to-user and search service Codes. (in the event of any inconsistency between these summaries and the user-to-user and search service Codes, the user-to-user and search service Codes prevail).

[2] This assumes that the provider has carried out a suitable and sufficient risk assessment, as required by the Act.

[3] See paragraphs 1.52 to 1.57 in our Overview of regulated services for further discussion of these two categories of search service. Source: Ofcom, 2024. Overview of regulated services.

Measures for user-to-user services

Table 1: Protection of Children Code of Practice for user-to-user services, likely to be accessed by children[4]

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
Governance and accountability (Volume 4, Section 11)			
PCU A1	The most senior governance body in relation to the service should carry out and record an annual review of risk management activities	Providers of large user-to-user services	ICU A1
PCU A2	Name an individual accountable to the most senior governance body for compliance with the safety duties protecting children and the reporting and complaints duties	Providers of all user-to-user services	ICU A2
PCU A3	Have written statements of responsibilities for senior managers who make decisions about the management of risks on the service having to do with content that is harmful to children in the UK	• Providers of large user-to-user services • Providers of user-to-user services that are multi-risk for content harmful to children	ICU A3
PCU A4	Have an internal monitoring and assurance function to provide independent assurance that measures are effective on an ongoing basis, and to report such findings for consideration by a relevant governance body or audit committee	• Providers of large user-to-user services that are multi-risk for content harmful to children	ICU A4
PCU A5	Track evidence of new kinds of primary priority content (PPC) and priority content (PC) on the service, and unusual increases in particular kinds of content that is harmful to children, or proxy for this	• Providers of large user-to-user services • Providers of user-to-user services that are multi-risk for content harmful to children	ICU A5

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[4] For functionality definitions, please refer to the Statement Glossary in Annex 7.

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
PCU A6	Have a code of conduct that sets standards and expectations for individuals working for the provider to protect children in the UK on the service	• Providers of large user-to-user services • Providers of user-to-user services that are multi-risk for content harmful to children	ICU A6
PCU A7	Secure that certain individuals working for the provider are sufficiently trained in the safety duties to protect children and reporting and complaints duties	• Providers of large user-to-user services • Providers of user-to-user services that are multi-risk for content harmful to children	ICU A7
Terms of service (Volume 4, Section 12)			
PCU G1	Include all information mandated by the Act in terms and statements regarding the protection of children	Providers of all user-to-user services	ICU G1
PCU G2	Summarise the findings of the most recent children's risk assessment in terms and statements	Providers of Category 1 and services	ICU G2
PCU G3	Ensure terms and statements regarding the protection of children are clear and accessible	Providers of all user-to-user services	ICU G3
Age Assurance (Volume 4, Section 13)			
PCU B1	Principles that services should have regard to when implementing highly effective age assurance	Providers of services likely to be accessed by children that implement a highly effective age assurance process for the purpose of acting in accordance with any of the recommendations set out in these Codes	No equivalent measure
PCU B2	Use highly effective age assurance to prevent children from accessing the entire service	Providers of user-to-user services: • where the principal purpose is the hosting or dissemination of one or more kinds of PPC	No equivalent measure
PCU B3	Use highly effective age assurance to prevent children from accessing the entire service	Providers of user-to-user services: • whose principal purpose is the hosting or dissemination of one or more kinds of PC	No equivalent measure

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
PCU B4	Use highly effective age assurance to ensure that children are prevented from encountering PPC identified on the service	Providers of user-to-user services: • whose principal purpose is not the hosting or the dissemination of one or more kinds of PPC; and • whose terms of service do not prohibit one or more kinds of PPC; or • prohibit all kinds of PPC in their terms of service but are currently unable to remove that content	No equivalent measure
PCU B5	Use highly effective age assurance to ensure that children are protected from encountering PC identified on the service	Providers of user-to-user services: • whose principal purpose is not the hosting or dissemination of one or more kinds of PC; and • whose terms of service do not prohibit one or more kinds of PC for which it is medium or high risk; or • prohibit one of more kinds of PC in their terms of service for which they are medium or high risk but are currently unable to remove that content	No equivalent measure
PCU B6	Use highly effective age assurance to apply Measure PCU E1 to children on the service	Providers of user-to-user services: • whose terms of service do not prohibit one or more kinds of PPC for which it is medium or high risk; and • have a content recommender system	No equivalent measure
PCU B7	Use highly effective age assurance to apply Measure PCU E2 to children on the service	Providers of user-to-user services: • whose terms of service do not prohibit one or more kinds of PC or NDC for which it is medium or high risk; and • have a content recommender system	No equivalent measure
Content moderation for user-to-user services (Volume 4, Section 14)			

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
PCU C1	Have a content moderation function to review and assess suspected content harmful to children	Providers of all user-to-user services	ICU C1
PCU C2	Have a content moderation function that allows for swift action on content harmful to children, where it is currently technically feasible to take appropriate action	Providers of all user-to-user services	ICU C2
PCU C3	Set internal content policies	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C3
PCU C4	Set and record performance targets	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C4
PCU C5	Prepare and apply a policy for the prioritisation of content for review	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C5
PCU C6	Resource the content moderation function to give effect to PCU C3 and PCU C4	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C6
PCU C7	Provide training and materials to individuals working in moderation (non-volunteers)	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C7

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
PCU C8	Provide materials to volunteers in the content moderation function	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU C8
User reporting and complaints (Volume 4, Section 16)			
PCU D1	Have complaints processes which enable people to make relevant complaints for service providers likely to be accessed by children	Providers of all user-to-user services	ICU D1
PCU D2	Have easy to access and use, and transparent complaints systems	Providers of all user-to-user services	ICU D2
PCU D3	Provide information prior to the submission of a complaint	• Providers of user-to-user services that are medium or high risk for any type of content harmful to children • Providers of large user-to-user services	ICU D3
PCU D4	Acknowledge receipt of complaints with indicative timeframe	• Providers of user-to-user services that are medium or high risk for any type of content harmful to children • Providers of large user-to-user services	ICU D4
PCU D5	Send further information about how the complaint will be handled	• Providers of user-to-user services that are medium or high risk for any type of content harmful to children • Providers of large user-to-user services	ICU D5
PCU D6	Opt-out from communications following a complaint	• Providers of user-to-user services that are medium or high risk for any type of content harmful to children	ICU D6

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
		• Providers of large user-to-user services	
PCUD7	Appropriate action for relevant complaints about content considered harmful to children	Providers of all user-to-user services	ICU D7
PCUD8	Set performance targets and resource itself to give effect to those targets for relevant complaints which are content appeals	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	ICU D8
PCUD9	Determine content appeals promptly	Providers of user-to-user services that are neither large, nor multi-risk for content harmful to children	ICU D9
PCUD10	Action following determination for relevant complaints which are content appeals	Providers of all user-to-user services	ICU D10
PCUD11	Appropriate action for age assessment appeals Providers should set performance targets and resource itself to give effect to those targets	• Providers of user-to-user services that are multi-risk for content harmful to children • Providers of large user-to-user services	No equivalent measure
PCUD12	Appropriate action for age assessment appeals and to determine them promptly	Providers of user-to-user services that are neither large, nor multi-risk for content harmful to children	No equivalent measure
PCUD13	Appropriate action for relevant complaints about non-compliance with the safety duties protecting children and the content reporting duties	Providers of all user-to-user services	ICU D12
PCUD14	Providers may disregard certain complaints as manifestly unfounded, if they have a policy in place setting out how they decide a complaint is manifestly unfounded	Providers of all user-to-user services	ICU D13

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
Recommender systems on user-to-user services (Volume 4, Section 17)			
PCU E1	Ensure content recommender systems are designed and operated so that content indicated potentially to be PPC is excluded from the recommender feeds of children	Providers of user-to-user services: • for which a child-accessible part of the service has a content recommender system; and • are medium or high risk for one or more specific kinds of PPC	No equivalent measure
PCU E2	Ensure content recommender systems are designed and operated so that content indicated potentially to be PC or NDC is excluded or given a low degree of prominence in the recommender feeds of children	Providers of user-to-user services: • for which a child-accessible part of the service has a content recommender system; and • are medium or high risk for one or more specific kinds of PC (other than bullying content) and/or NDC	No equivalent measure
PCU E3	Enable children to give negative feedback on content that is recommended to them which is taken into account in how content is recommended to them	Providers of large user-to-user services: • for which a child-accessible part of the service has a content recommender system; and • are medium or high risk for two or more specific kinds of content harmful to children (excluding bullying content)	No equivalent measure
User support (Volume 4, Section 18)			
PCU J1	Provide children with the option to block and mute other users' accounts	Providers of user-to-user services that: • are high risk for one or more of: suicide content, self-harm content, eating disorder content, bullying content, abuse and hate content, or violent content; and • have user profiles and certain user interaction functionalities[5]	ICU J1

[5] At least one of the following functionalities: user connection, posting content and user communication (including direct messaging and commenting on content).

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
		Providers of user-to-user services with over 700,000 monthly UK users that: • are medium risk for one or more of: suicide content, self-harm content, eating disorder content, bullying content, abuse and hate content, or violent content; and • have user profiles and certain user interaction functionalities[6]	
PCU J2	Provide children with the option to disable comments on their content	Providers of user-to-user services that: • are high risk for one or more of: suicide content, self-harm content, eating disorder content, bullying content, abuse and hate content, or violent content; and • have the functionality of commenting on content Providers of user-to-user services with over 700,000 monthly UK users that: • are medium risk for one or more of: suicide content, self-harm content, eating disorder content, bullying content, abuse and hate content, or violent content; and • have the functionality of commenting on content	ICU J2
PCU J3	Provide children with an option to accept or decline an invitation to join a group chat	Providers of user-to-user services that: • are medium or high risk for one or more of: pornographic content, suicide content, self-harm content, eating disorder content, bullying content,	No equivalent measure

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[6] At least one of the following functionalities: user connection, posting content and user communication (including direct messaging and commenting on content).

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
		abuse and hate content, or violent content; and • have group messaging functionality	
PCU F1	Provide age-appropriate user support materials for children	Providers of user-to-user services that: • are multi-risk for content harmful to children	No equivalent measure
PCU F2	Provide children with information when they restrict content or interactions with other accounts	Providers of large user-to-user services that: • are multi-risk for content harmful to children	ICU F2 (partly mirrored)
PCU F3	Signpost children to support at important points in the user journey	When children report content: Providers of user-to-user services that: • are medium or high risk for one or more of: suicide content, self-harm content, eating disorder content or bullying content	No equivalent measure
PCU F4	Signpost children to support at important points in the user journey	When children post or repost harmful content: Providers of large user-to-user services that: • have posting/re-posting functionalities, and • are medium or high risk for one or more of: suicide content, self-harm content, eating disorder content or bullying content; and • have means, measures or processes that make them aware when a user posts or reposts content that might constitute suicide, self-harm, eating disorder or bullying content	No equivalent measure

Measure number	Measure Description	Providers this measure applies to	Equivalent measure for Illegal Harms
PCU F5	Signpost children to support at important points in the user journey	When children search for harmful content: Providers of user-to-user services that: • have user-generated content searching functionality, and • are medium or high risk for one or more of: suicide content, self-harm content or eating disorder content; and • have methods that enable them to identify when a user searches for suicide, self-harm or eating disorder content	No equivalent measure

Measures for search services

Table 2: Protection of Children Code of Practice for search services, likely to be accessed by children

Measure Number	Measure Description	Providers this measure applies to	Equivalent measure for illegal harms
Governance and accountability (Volume 4, Section 11)			
PCS A1	The most senior governance body in relation to the service should carry out and record an annual review of risk management activities	Providers of large general search services	ICS A1
PCS A2	Name an individual accountable to the most senior governance body for compliance with the safety duties protecting children and the reporting and complaints duties	Providers of all search services	ICS A2
PCS A3	Have written statements of responsibilities for senior managers who make decisions about the management of risks on the service having to do with content that is harmful to children in the UK	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS A3

Measure Number	Measure Description	Providers this measure applies to	Equivalent measure for illegal harms
PCS A4	Have an internal monitoring and assurance function to provide independent assurance that measures are effective on an ongoing basis, and to report such findings for consideration by a relevant governance body or audit committee	Providers of large search services that are multi-risk for content harmful to children	ICS A4
PCS A5	Track evidence of new kinds of primary priority content (PPC) and priority content (PC) on the service, and unusual increases in particular kinds of content that is harmful to children, or proxy for this	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS A5
PCS A6	Have a code of conduct that sets standards and expectations for individuals working for the provider to protect children in the UK on the service	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS A6
PCS A7	Secure that certain individuals working for the provider are sufficiently trained in the safety duties to protect children and reporting and complaints duties	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS A7
Publicly available statements (Volume 4, Section 12)			
PCS G1	Include all information mandated by the Act in terms and statements regarding the protection of children	• Providers of all search services	ICS G1
PCS G2	Summarise the findings of the most recent children's risk assessment in terms and statements	• Providers of Category 2a services	ICS G2
PCS G3	Ensure terms and statements regarding the protection of children are clear and accessible	• Providers of all search services	ICS G3
Search moderation (Volume 4, Section 15)			
PCS C1	Have moderation systems and processes in places to review, assess and take appropriate action on content that is harmful to children	Providers of all search services	ISC C1

Measure Number	Measure Description	Providers this measure applies to	Equivalent measure for illegal harms
PCS C2	Filter out primary priority content for users determined to be children	Providers of large general search services	No equivalent measure
PCS C3	Set internal content policies	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS C2
PCS C4	Set and record performance targets	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS C3
PCS C5	Prepare and apply a policy for the prioritisation of content for review	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS C4
PCS C6	Resource the search moderation function to give effect to PCS C3 and PCS C4	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS C5
PCS C7	Provide training and materials to individuals working in moderation (non-volunteers)	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS C6
User reporting and complaints (Volume 4, Section 16)			
PCS D1	Have complaints processes which enable people to make relevant complaints for service providers likely to be accessed by children	Providers of all search services	ICS D1
PCS D2	Have easy to access and use, and transparent complaints systems	Providers of all search services	ICS D2
PCS D4	Acknowledge receipt of complaints with indicative timeframe	• Providers of search services that are medium or high risk for any type of content harmful to children	ICS D3

Measure Number	Measure Description	Providers this measure applies to	Equivalent measure for illegal harms
		• Providers of large general search services	
PCS D5	Send further information about how the complaint will be handled	• Providers of search services that are medium or high risk for any type of content harmful to children • Providers of large general search services	ICS D4
PCS D6	Opt-out from communications following a complaint	• Providers of search services that are medium or high risk for any type of content harmful to children • Providers of large general search services	ICS D5
PCS D7	Appropriate action for relevant complaints about content considered harmful to children	Providers of all search services	ICS D6
PCS D8	Set performance targets and resource itself to give effect to those targets for relevant complaints which are content appeals	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	ICS D7
PCS D9	Determine content appeals promptly	Providers of search services that are neither large, nor multi-risk for content harmful to children	ICS D8
PCS D10	Action following determination for relevant complaints which are content appeals	Providers of all search services	ICS D9
PCS D11	Appropriate action for age assessment appeals Providers should set performance targets and resource itself to give effect to those targets	• Providers of search services that are multi-risk for content harmful to children • Providers of large general search services	No equivalent measure
PCS D12	Appropriate action for age assessment appeals and to determine them promptly	Providers of search services that are neither large, nor multi-risk for content harmful to children	No equivalent measure
PCS D13	Appropriate action for relevant complaints about non-compliance with the safety duties protecting	Providers of all search services	ICS D11

Measure Number	Measure Description	Providers this measure applies to	Equivalent measure for illegal harms
	children and the content reporting duties		
PCS D14	Providers may disregard certain complaints as manifestly unfounded, if they have a policy in place setting out how they decide a complaint is manifestly unfounded	Providers of all search services	ICS D12
User Support (Volume 4, Section 18)			
PCS F4	Provide age-appropriate user support materials for children	Providers of search services that are multi-risk for content harmful to children	No equivalent measure
Search features, functionalities and user support (Volume 4, Section 19)			
PCS F1	Offer users a means to easily report predictive search suggestions relating to PPC and PC. If a clear and material risk is identified, take appropriate steps to ensure the reported predictive search suggestion is not recommended to any users	Providers of large general search services which use a predictive search functionality.	ICS F1
PCS F3	Provide crisis prevention information in response to search requests that contain general queries or queries seeking specific, practical or instructive information regarding suicide, self-harm and eating disorders	Providers of large general search services.	ICS F3