



Consultation response form

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

Your response

Question	Your response
<p>Volume 2: Identifying the services children are using Children’s Access Assessments (Section 4).</p>	
<p>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.</p> <ol style="list-style-type: none"> 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? 	<p>Confidential? – N</p> <p>We acknowledge the concerns raised by Ofcom around the presence of even a small number of child users on a service, as well as the specific requirements of the Online Safety Act to ensure that services likely to be accessed by children are conducting appropriate risk assessments. In this regard, it is helpful to see the draft requirements echo the guidance from the UK’s ICO: we strongly encourage UK regulators to align requirements, especially where these leverage the same statutory language. This enables providers to conduct a single children’s access assessment, supporting harmonized approaches and building industry knowledge and capability.</p> <p>We also agree that a flexible approach to a “significant number” of users who are children is appropriate here, rather than risk imposing numerical thresholds that may not reflect the context of a unique service.</p> <p>However, we have an overarching concern that applies to both the Illegal Content Code consultation and the current consultation. Specifically, the complexity of the Codes and the assessment requirements in the UK Online Safety Act regime, and the level of detail anticipated under the Codes, may result in services’ prioritization of process and documentation, rather than a focus on identifying existing and new harms, or innovating in safety to stay ahead of new risk vectors. The emphasis on formality in these activities may run counter to a proportionate regulatory regime. We therefore underscore the need to avoid the risk of an overly rigid approach to assessment and documentation. Reducing complexity should be a key goal in the final Codes. This would benefit users, the regulator, and tech companies by helping focus efforts on the adequacy of the assessment and mitigations, rather than on process requirements.</p>

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

Draft Children’s Register of Risk (Section 7)

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:

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?

Confidential? – N

No response

<p>a) Please Provide any information about any risks identified</p> <p>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:</p> <p>a) (i) specific examples of body image or depressive content linked to significant harms to children,</p> <p>b. (ii) evidence distinguishing body image or depressive content from existing categories of priority or primary priority content.</p> <p>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.</p>	
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Draft Guidance on Content Harmful to Children (Section 8)	
<p>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?</p> <p>13. Do you have further evidence that can support the guidance provided on different kinds of content harmful to children?</p> <p>14. For each of the harms discussed, are there additional categories of content that Ofcom</p> <p>a) should consider to be harmful or</p> <p>b) consider not to be harmful or</p>	<p>Confidential? – N</p> <p>We address this elsewhere in our response but note that the definitions and examples of violative and non-violative Primary Priority Content (PPC) and Priority Content (PC) focus mostly on the harm that results because a child is exposed to such content (whether unwittingly or because they have attempted to seek it out).</p> <p>However, bullying and abuse tend to manifest differently and harm may result from the targeting of an individual, or group of individuals. We recommend further tailoring the definitions and examples to better identify risk patterns associated with different types of content.</p>

c) where our current proposals should be reconsidered?

Volume 4: How should services assess the risk of online harms?

Governance and Accountability (Section 11)

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

As a general note, we welcome Ofcom's efforts to streamline compliance by mirroring requirements from the Illegal Content Codes. To support coherence across the regimes and reduce the potential for duplicative efforts or documentation, we strongly agree with the proposition that providers may leverage a single process to comply with both the illegal content duties and child safety duties. While we acknowledge that addressing harms to children requires special care (including to meet the requirements of the Act), we see value in reinforcing a single set of governance and accountability mechanisms for efficiency and to help build and deepen a company's safety culture.

Microsoft addressed related issues in our submission to the Illegal Harms Consultation and incorporate by reference herein our response to questions 4 and 5.

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

<p>17. What do you think about our proposals in relation to the Children’s Risk Assessment Guidance?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>18. What do you think about our proposals in relation to the Children’s Risk Profiles for Content Harmful to Children?</p> <p>a) Please provide underlying arguments and evidence of efficacy or risks that support your view.</p> <p>Specifically, we welcome evidence from regulated services on the following:</p> <p>19. Do you think the four-step risk assessment process and the Children’s Risk Profiles are useful models to help services understand the risks that their services pose to children and comply with their child risk assessment obligations under the Act?</p> <p>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?</p> <p>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?</p> <p>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</p>	<p>Confidential? – N</p> <p>We acknowledge the importance of conducting child safety risk assessments, including to meet the requirements of the Act and to ensure in-scope services understand the specific risks to children that may arise from PPC, PC, and NDC.</p> <p>As outlined in Microsoft’s response to the Illegal Harms Consultation, we urge Ofcom to consider ways in which the method and substance of risk assessments can be aligned across regulatory regimes. We incorporate by reference herein our response to question 7 in Microsoft’s response to the Illegal Harms Consultation. Similarly, we welcome Ofcom’s efforts to keep both sets of risk profiles as consistent as possible.</p> <p>We also urge Ofcom to consider how best to provide pragmatic guidance on how in-scope services can produce “suitable and sufficient” risk assessments that are fit for purpose without creating incentives to prioritize process and documentation over focusing on improved safety outcomes. Companies of all sizes need to make risk-proportionate investments in trust and safety personnel but in every case, there will be day-to-day capacity trade-offs for those expert personnel, particularly as compliance-based risk assessment practices evolve and develop. We appreciate the guidance that the level of evidence and analysis required will depend on the nature and size of the service. In support of a proportionate approach, including in the record-keeping duties, Ofcom may wish to develop best practice examples for different services to illustrate this flexibility in practice.</p> <p>We note the guidance employs child user threshold numbers as a proxy measure for assessing the impact of harm, where these numbers align to the thresholds proposed for the illegal content risk assessments. Microsoft provided feedback on these numbers in our previous response to the Illegal Harms Consultation and we incorporate herein by reference our response to question 14. Moreover, while greater numbers of children on a service may increase the risk of harm, the proposed numerical thresholds may not reflect differences in the ways content and conduct harms manifest – for example, while a large number of children may be harmed when certain content is present on a service, bullying and abuse rely on targeting a victim. Not all of the content harmful to children relies solely on exposure, meaning that a large number of child</p>
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includes the draft Children's Register of Risks.

users does not necessarily equate to a high-risk environment. Similarly, the nature of the service is critical: a large number of child users leveraging a service that enables limited user to user communications presents less risk to children.

We therefore recommend a more flexible approach to assessing the potential impact, depending on the service and nature of the potential harm. The risk level tables may benefit from more clearly making this distinction, as would the definition of "multi-risk" service. Moreover, the definition of multi-risk currently draws no distinction between PPC, PC and NDC. The statutory scheme inherently draws a distinction between "priority" and other kinds of harmful content, with PPC including the categories of content deemed harmful to children by exposure, rather than targeted conduct. We recommend using this distinction in the test for whether a service is multi-risk by including a different threshold in relation to both PC and NDC risks (particularly given NDC risks are likely to be much more difficult to evaluate and highly contextual in nature). We also recommend considering options that distinguish between a "medium" and a "high" risk of harm on a service: for example, it would be appropriate to consider a different threshold for "multi-risk" where a service is at medium risk of different harms.

We appreciate Ofcom's acknowledgment that child safety risk assessments will need to be context specific. The Children's Risk Profiles and evidence inputs will provide a useful starting point. However, further guidance could be provided to help services determine whether they need to leverage the "enhanced" input to their risk assessments. Further guidance should also be provided to support services in assessing the potential risk of NDC, as well as of cumulative harm. Assessing the potential harm from online content and conduct requires deep subject matter expertise, including insights from research and evidence. To meaningfully assess risk and take proportionate measures to address such harms requires clear guidance and definitions that can be translated into action across diverse internal teams supporting trust and safety and compliance. Without clearer guidance on NDC and guidance for assessing the potential for cumulative harm (both of which may look different across diverse services), it may be difficult for in-scope services to translate this into practice. For example, the description of cumulative harm could be read as focused on

	<p>scenarios in which children are recommended content. The concept of encountering harmful content alongside other content that is not PPC, PC or NDC but that might increase the harm also potentially broadens the range of content and conduct in scope, without further guidance or bounds. Equally, the risk tables include the concept of “indirect” harm, which might impact children outside the service. It is not clear how a service might go about assessing this risk, given this appears to predominantly require assessment of offline impacts and which may be highly individual or subjective.</p> <p>We also recommend the guidance acknowledge that while certain functions or features may alter their risk profile, the risk should be considered within the context of the service, including the type and nature of the service. Recognizing this context will be critical to help tailor risk assessments. For example, the guidance notes that a high number of overall users means a service should assume it has a high number of child users. This may not be the case, for example, for a service that is primarily a productivity service, or for a professional social network. The nature of the service will also impact the specific risk factors in the children’s risk profiles: for instance, the risk associated with group messaging will depend on factors such as the overall service type, ability to add strangers, and so on.</p>
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<p>Volume 5 – What should services do to mitigate the risk of online harms</p> <p>Our proposals for the Children’s Safety Codes (Section 13)</p>	
<p>Proposed measures</p> <p>22. Do you agree with our proposed package of measures for the first Children’s Safety Codes?</p> <p>a) If not, please explain why.</p> <p>Evidence gathering for future work.</p> <p>23. Do you currently employ measures or have additional evidence in the areas we have set out for future consideration?</p>	<p>Confidential? – N</p> <p>As outlined elsewhere in this response, we welcome Ofcom’s efforts to mirror measures from the Illegal Content Codes and to encourage services to use common processes. Steps to protect all users will also benefit children, in addition to streamlining compliance. We also welcome Ofcom’s proposed flexible approach (e.g., to CM1), given the likely variation in how services will approach this measure, depending on the risk and the service.</p> <p>As noted elsewhere in this response, the less defined nature of NDC will pose challenges for services trying to implement these</p>

<p>a) If so, please provide evidence of the impact, effectiveness and cost of such measures, including any results from trialling or testing of measures.</p> <p>24. Are there other areas in which we should consider potential future measures for the Children’s Safety Codes?</p> <p>a) If so, please explain why and provide supporting evidence.</p>	<p>measures. Generally, online safety regulation now recognizes the need for services to provide clear policies, to enforce these consistently, and to provide transparency on the outcomes. The inclusion of NDC appears to be a matter of first impression across global online safety laws and as such, we are unaware of emerging standards that would meet Ofcom’s expectations. As outlined above, we recommend Ofcom provide further guidance specifically on implementation of such measures.</p> <p>In the context of age assurance, Ofcom has asked about challenges in taking effective actions to protect children from encountering harmful content via private messaging channels. We acknowledge that certain kinds of content or conduct harmful to children may arise in the context of one-to-one or group messaging. However, the measures appropriate to combat harm (whether to users under or over age 18) should vary in this context, recognizing user expectations of privacy, as well as intersecting legal regimes. Ofcom’s proposed approach to illegal harms recognized this by limiting recommended automated detection to more public spaces; in fact, Ofcom dedicated an entire Annex to the distinction between public/private communications. We recommend Ofcom continue to draw a distinction between public and private communications and the need to limit processing minors’ personal data. Regardless of age, empowerment tools such as blocking, muting, and the ability to vet message requests may be the most appropriate approach to mitigating the in-scope harms. The Consultation materials mention, for example, sharing hyperlinks to pornographic content. These may not be amenable to accurate detection measures, even if that were appropriate in private messaging.</p>
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Developing the Children’s Safety Codes: Our framework (Section 14)	
<p>25. Do you agree with our approach to developing the proposed measures for the Children’s Safety Codes?</p> <p>a) If not, please explain why.</p>	<p>Confidential? – N</p> <p>Please see our response to section 12 above for Microsoft’s comments on the definitions of “multi-risk” and “large”.</p>

<p>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?</p> <p>a) Please explain your views.</p> <p>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?</p> <p>28. Do you agree with our definition of 'large' and with how we apply this in our recommendations?</p> <p>29. Do you agree with our definition of 'multi-risk' and with how we apply this in our recommendations?</p> <p>30. Do you agree with the proposed measures that we recommend for all services, even those that are small and low-risk?</p>	
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Age assurance measures (Section 15)	
<p>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.</p> <p>a) Are there any cases in which HEAA may not be appropriate and proportionate?</p>	<p>Confidential? – N</p> <p>At Microsoft, we recognize the increasing importance of leveraging age assurance mechanisms to obtain more accurate age data, enabling better tailored safety and privacy protections for young people, as well as to help provide them with age-appropriate experiences. Given the trade-offs that can arise as a result of efforts to capture more accurate age data (including privacy, security, equity, and access challenges), we support a proportionate and risk-based approach to age assurance. We therefore welcome Ofcom's efforts to narrow the circumstances in which age assurance measures are</p>

<p>b) In this case, are there alternative approaches to age assurance which would be better suited?</p> <p>32. Do you agree with the scope of the services captured by AA1-6?</p> <p>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?</p> <p>34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services?</p> <p>a) Please provide any supporting information or evidence in support of your views.</p> <p>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?</p>	<p>mandated under the Online Safety Act regime and to take a risk-based approach. We have provided comment elsewhere in this submission about the nature of PPC and PC risks, which may require reconsidering the thresholds by which a service is medium/high risk for one or more kinds of PC and which may help further ensure that these requirements are applied in a risk-proportionate manner. As a result, for example, we recommend reconsidering measure AA4 to reflect the differences among the categories of PC and to provide greater differentiation between “high” and “medium” risk. We also note there is a discrepancy between the definition of multi-risk and the risk thresholds for the application of age assurance. We recommend considering whether these should be aligned, so that the age assurance requirements remain consistent with the treatment of risk elsewhere in the paper: it seems incongruent that a service at risk for one type of PC would be required to implement age assurance measures, while not regarded as sufficiently risky to implement other protective measures.</p> <p>As Ofcom is aware, safety technologies (including age assurance and verification technologies) are still evolving – no “silver bullet” system currently exists that can provide highly robust age signals while also ensuring expected levels of privacy, and mitigating security and other risks. Age assurance and verification will introduce new user friction into online experiences in a way that may result in significant feedback and concerns from UK citizens which will likely require a period of experimentation and evolution. In its final guidance, Ofcom may wish to explicitly recognize the need for an iterative and evolving approach given the trade-offs and evolving technologies.</p> <p>The guidance also speaks to the need for service providers to evaluate a proposed age assurance process against each of the four criteria (technically accurate, robust, reliable, and fair). In some cases, services may choose to develop in-house solutions. However, many providers may choose to work with an external age assurance vendor, who will be best placed to provide detailed information on some of these metrics. We recommend the guidance on age assurance more explicitly provides details on how external vendors can provide appropriate certainty to multiple customers that meets the requirements of the UK’s regime.</p>
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	<p>To support regulatory coherence, we also recommend that Ofcom and the ICO consider issuing joint guidance on age assurance mechanisms that meets the standards for both regimes and consider developing a certification program. This would support the ecosystem of both vendors and in-scope services to make informed decisions and drive clarity on regulatory expectations in the UK.</p>
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Content moderation U2U (Section 16)	
<p>36. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>37. Do you agree with the proposed addition of Measure 4G to the Illegal Content Codes?</p> <p>a) Please provide any arguments and supporting evidence.</p>	<p>No response.</p>

Search moderation (Section 17)	
<p>38. Do you agree with our proposals? Please provide the underlying arguments and evidence that support your views.</p> <p>39. Are there additional steps that services take to protect children from the harms set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>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?</p> <p>The use of Generative AI (GenAI), see Introduction to Volume 5, to facilitate</p>	<p>Confidential? – N</p> <p>The background to the draft codes notes that Ofcom chose not to recommend the use of specific automated technologies in the Children’s Safety Codes, given the risk this could result in the suppression of relevant information/content that is not harmful to children. We agree with this recommendation. In particular, content associated with suicide/self-harm and eating disorders may be difficult to immediately differentiate from content focused on recovery, support, and awareness-raising as this content may use very similar language. We note this context is likely to be a particular challenge for search services in mitigating these risks. Moves to broaden defensive search measures may result in children losing access to sources of community and help because of the difficulty in precisely</p>

<p>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:</p> <p>41. Do you consider that it is technically feasible to apply the proposed code measures in respect of GenAI functionalities which are likely to perform or be integrated into search functions?</p> <p>42. What additional search moderation measures might be applicable where GenAI performs or is integrated into search functions?</p>	<p>calibrating measures to address contextual content across trillions of web signals.</p> <p>Because search fundamentally involves indexing all of these signals to provide high quality and authoritative content in response to user queries, we note that the search moderation measures may create additional challenges to implement at scale. For example, given the nature of most PC (e.g., bullying and abuse), a service may not have the context required to judge the potential severity of harm of content on a third-party website. This challenge will be exacerbated for NDC.</p> <p>We appreciate that Ofcom has differentiated the proposed measures to address PPC from those to address PC, recognizing that enabling providers to decide how to action PC should result in better targeted responses, preserving access to information.</p> <p>The consultation also asks about the application of these features into generative AI features or functionalities. We recognize the criticality of ensuring that providers are assessing and mitigating any potential risks to children that might arise from generative AI features incorporated in search services or other services falling within the scope of the Online Safety Act. However, we note the need to consider safety in generative AI features as distinct from moderation measures in search. While search moderation may help ensure that high-quality and authoritative content is surfaced through generative AI features, such features also benefit from safety by design and responsible AI measures intended to support the quality of the product and ensure the system is acting as intended. Such measures at the application level may include, for example, the use of metaprompts and classifiers and the provision of links/citations. We welcome the opportunity to discuss how additional guidance might appropriately acknowledge how responsible AI architecture can support efforts to minimize children’s exposure to harmful content.</p>
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User reporting and complaints (Section 18)

<p>43. Do you agree with the proposed user reporting measures to be included in the draft Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>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.</p> <p>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?</p> <p>a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence.</p> <p>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.</p> <p>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)?</p> <p>a) Please provide any arguments and supporting evidence.</p>	<p>No response.</p>
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<p>46. Do you agree with the proposed Terms of Service / Publicly Available Statements measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measures your views relate to and provide any arguments and supporting evidence.</p> <p>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.</p> <p>47. Can you identify any further characteristics that may improve the clarity and accessibility of terms and statements for children?</p> <p>48. Do you agree with the proposed addition of Measure 6AA to the Illegal Content Codes?</p> <p>a) Please provide any arguments and supporting evidence.</p>	<p>Confidential? – N</p> <p>With respect to proposed Measure TS3 and Measure 6AA of the Illegal Content Codes, we recommend giving category 1 services some flexibility about where a summary of its risk assessment should be published. While we acknowledge the importance of contextualizing for users why certain content and conduct is prohibited or otherwise addressed through safety measures, it is also important to provide clarity on the rules that apply. Merging the two may cause conflation or confusion. As a result, it may be clearer to present distinct sets of user information in separate locations, ensuring a service’s terms or statement is as clear as possible. We also recommend clarifying that risk assessment summaries should avoid any detail that might facilitate or enable efforts to subvert child protection measures or illegal content risk mitigations.</p>
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Recommender systems (Section 20)	
<p>49. Do you agree with the proposed recommender systems measures to be included in the Children’s Safety Codes?</p> <p>a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.</p> <p>b) If you responded to our illegal harms consultation and this is relevant to your response here, please signpost</p>	<p>No response.</p>

<p>to the relevant parts of your prior response.</p> <p>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?</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Please provide the underlying arguments and evidence of the relevance of this content to Measures RS2 and RS3. 	
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<p>User support (Section 21)</p>	
<p>53. Do you agree with the proposed user support measures to be included in the Children’s Safety Codes?</p>	<p>Confidential? – N</p> <p>We welcome the proportionate approach Ofcom has taken to the user support measures and the recognition that children</p>

<p>a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.</p> <p>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.</p>	<p>should also be given the tools to tailor their own online experiences.</p> <p>In implementing Measure US5 (Signpost children to support at key points in the user journey) and Measure SD2 (Provide crisis prevention information in response to known PPC-related search requests regarding suicide, self-harm, and eating disorders) we recommend Ofcom work with UK government agencies and providers to compile appropriate suggested resources and support services. This will ensure in-scope services have the best possible information about the recommended support in the UK and help illustrate the critical role these services play in a whole-of-society approach to addressing these complex issues. Doing so will also reduce the potential burden on support services in dealing individually with in-scope online services.</p>
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Search features, functionalities and user support (Section 22)	
<p>54. Do you agree with our proposals? Please provide underlying arguments and evidence to support your views.</p> <p>55. Do you have additional evidence relating to children’s use of search services and the impact of search functionalities on children’s behaviour?</p> <p>56. Are there additional steps that you take to protect children from harms as set out in the Act?</p> <p>a) If so, how effective are they?</p> <p>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</p>	<p>Please see our response on section 17 for Microsoft’s comment on generative AI safety measures.</p>

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.

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?	No response.
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.	No response.
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	No response.

adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.	
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