

Question	Your response
<p>content or content harmful to children, or harms and risks to children from broadcasting livestreams?</p>	
<p><b>Question 2: Do you have further evidence regarding the benefits to users or children from livestreaming?</b></p>	<p>Nil response.</p>
<p><b>Question 3: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 4: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 5: Do you have any views on the optimal design of reporting functions and choice categories for users to report content that depicts the risk of imminent physical harm ? Include any evidence, such as, testing to optimise wording, design of tools to support users to submit accurate and timely reports and how these may be used to support moderation actions.</b></p>	<p>Nil response.</p>
<p><b>Question 6: Do you consider that there are alternative measures which would materially reduce the risks to users from livestreaming such as preventive safety by design frictions, prompts or restrictions? If so, please detail them and provide evidence on the costs and efficacy.</b></p>	<p>Nil response.</p>
<p><b>Question 7: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>

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<p><b>Question 8: If you are a service provider, what measures do you currently undertake to moderate livestreams and protect children who undertake livestream broadcasts, and what is your evidence on the effectiveness of such measures?</b></p>	<p>Nil response.</p>
<p><b>Question 9: Do you consider that there are alternative measures which would materially reduce the risks children face when livestreaming, both in general and in relation to operation of the supporting functionalities of comments, reactions, gifting and content capture? If so, please detail them and provide evidence on the costs and efficacy.</b></p>	<p>Nil response.</p>
<p><b>Question 10: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 11: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Confidential? – N</p> <p>GitHub acknowledges the importance and potential of leveraging proactive detection technologies to maintain platform safety. GitHub employs PhotoDNA to proactively detect CSAM and terrorist violent extremist content (TVEC). While we support effective safety measures, we caution against mandating broad detection requirements that lack robust, context-sensitive solutions. As a code collaboration platform, GitHub’s content is primarily software code, and applying generic detection tools can result in false positives which could lead to unexpected interruptions of professional software development processes and affect the availability of widely used open source software tools that enterprises and governments depend on.</p> <p>GitHub also acknowledges that proprietary solutions for content moderation can be a barrier to entry for smaller platforms and encourages Ofcom to consider providing resources or open sourcing solutions. A notable contribution to open source safety solutions is the <a href="#">Robust Open Online Safety Tools</a> (ROOST) project, which is an effort to build open, accessible, and scalable safety infrastructure available to digital platforms</p>

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	<p>and communities of all sizes. GitHub is a ROOST partner and contributes tooling and resources to their effort.</p> <p>GitHub cautions against mandating the use of upload scanning or filters for proactive detection. In the case of code collaboration platforms, upload filters can result in a high rate of false positives for copyright infringement because of independent duplication in software code. However, upload filtering has significant trade-offs for any file-sharing platform because it can negatively impact the functionality and user experience of platforms. Ofcom should carefully consider these impacts and focus on the highest risk of the most egregious content.</p>
<p><b>Question 12: Do you have any comments on the Proactive Technology Draft Guidance?</b></p>	<p>Nil response.</p>
<p><b>Question 13: Do you agree with the harms currently in scope of these measures? Are there any additional harms that these measures should capture? Please provide the underlying arguments and evidence that support your views, including evidence regarding the availability of accurate and effective proactive technology.</b></p>	<p>Confidential? – N</p>
<p><b>Question 14: Do you agree with who we propose should implement these measures? Are there any other services that should be captured for some or all of the relevant harms?</b></p>	<p>Confidential? – N</p> <p>The proposals currently apply to large user-to-user services that are medium or high risk for at least one relevant harm. Given these are new measures with an emerging framework for technology assessment, Ofcom may wish to consider initially limiting the application only to large user-to-user services that are high risk for at least one relevant harm, providing time to assess the impact and rollout of the changes.</p>
<p><b>Question 15: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Confidential? – N</p> <p>The impact of these measures will vary significantly depending on the service, technology, and content in scope. While the proposals aim to address harm, they may underestimate the substantial costs associated with human review and moderation, particularly when considered alongside other obligations under the broader Online Safety Act regime. Increased content volumes could introduce new trade-offs and operational challenges for review processes.</p>

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	<p>In addition, the cost of proactive technologies may also be underestimated. This remains a niche market, where limited availability and pricing constraints could pose challenges. Specialized platforms that host unusual categories of user-generated content, such as GitHub repositories, face unique moderation challenges. Code-sharing environments often involve complex technical content that is difficult to classify using standard moderation tools. Because fewer solutions exist for detecting harmful or illegal material in code repositories, the costs for developing or adapting proactive technologies for these platforms are likely to be significantly underestimated.</p>
<p><b>Question 16: Do you agree with our proposal?. Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response</p>
<p><b>Question 17: Do you have any evidence relevant to the examples given?</b></p>	<p>Nil response</p>
<p><b>Question 18: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response</p>
<p><b>Question 19: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response</p>
<p><b>Question 20: Do you have any evidence on the relative efficacy of third-party and internal databases for image-based IIA content?</b></p>	<p>Nil response</p>
<p><b>Question 21: Do you consider this measure to be effective for file-sharing and file-storage services? Please explain your reasoning and, if possible, provide supporting evidence.</b></p>	<p>Nil response</p>

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<p><b>Question 22: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response</p>
<p><b>Question 23: Do you consider this measure to be effective for large general search services? Please explain your reasoning and, if possible, provide supporting evidence.</b></p>	<p>Nil response</p>
<p><b>Question 24: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Confidential? – N</p> <p>GitHub recently joined the Global Internet Forum to Counter Terrorism (GIFCT), building on prior engagement through Microsoft. GIFCT is a cross-industry initiative that strengthens collaboration and innovation to address terrorist and violent extremist content online. Its resources, including the hash-sharing database and Incident Response Framework, provide valuable tools for companies to respond effectively to emerging threats. To acknowledge the value of this cross-industry and multistakeholder collaboration, consideration should be given to how GIFCT membership and resources can be leveraged by in-scope services to meet compliance obligations under the proposed measures.</p>
<p><b>Question 25: Do you have evidence regarding the accuracy and effectiveness of hash matching solutions for detection of terrorism content specifically (including their false positive and false negative rates);</b></p>	<p>Nil response.</p>
<p><b>Question 26: Do you have evidence on the extent to which a hash matching solution can identify terrorism content accurately when applied in different contexts from that in which the hash was created, noting the potential implications for freedom of expression;</b></p>	<p>Nil response.</p>
<p><b>Question 27: Do you have a view on the degree of human oversight required to support the use of hash</b></p>	<p>GitHub has only had false positives for TVEC content detected by PhotoDNA. These instances require human oversight and review to verify whether it is an accurate hit.</p>

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matching in relation to terrorism content?	
<p><b>Question 28: Do you have evidence or views on the impact assessment (including costs) associated with implementing and maintaining hash matching technology for the detection of terrorism content (such as the impacts and costs of setting up an internal database, connecting to an external provider, and moderation costs).</b></p>	<p>Nil response.</p>
<p><b>Question 29: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 30: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 31: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 32: Do you have evidence on what types of content are typically recommended to users as part of concerted foreign interference activity;</b></p>	<p>Nil response.</p>
<p><b>Question 33: Do you have evidence on whether services track the extent of algorithmic amplification, such as impressions and reach, of content that is later deemed illegal/violating. If so, do they (or does your service) use this information to enhance the safety of their systems?</b></p>	<p>Nil response.</p>

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<p><b>Question 34: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 35: Are there any impacts of the proposed measure that we have not identified? Please provide the rationale and any supporting evidence for your response.</b></p>	<p>Nil response.</p>
<p><b>Question 36: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Confidential? – Y / N</p>
<p><b>Question 37: What is your assessment of the options we set out in relation to the treatment of child users and which option do you consider to be most appropriate? Please provide any supporting evidence to support your arguments.</b></p>	<p>Confidential? – Y / N</p>
<p><b>Question 38: Do you agree with our assessment of the impacts (including costs) associated with this proposal? Please provide any relevant evidence which supports your position.</b></p>	<p>Confidential? – Y / N</p>
<p><b>Question 39: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Establishing an overarching user sanctions policy would not be appropriate because enforcement approaches vary significantly given the context of the platform, users, and type of content. On code collaboration platforms like GitHub, content can be flagged as illegal or policy-violative even when downstream users are unaware of its origin or context. Since code is frequently reused and modified by many contributors, blanket sanctions risk unfairly penalizing users who had no intent or knowledge of the violation.</p> <p>The downstream impact goes beyond individual developers. If a user account is sanctioned and becomes unable to maintain its projects, third parties, including enterprises, may face immediate disruption. Many organizations rely on open source projects for critical infrastructure, and losing maintainers can break dependencies, delay security updates, and create operational risks. Enforcement models like “three strikes and</p>

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	<p>you're out," often used for copyright takedowns, illustrate this challenge: while they may seem fair, they can lead to unjust outcomes for open source developers who routinely fork popular projects. Code is collaborative, complex, and often reused, which amplifies the downstream effects of sanctions and makes enforcement uniquely challenging. Providers should retain flexibility to determine their own approach to user sanctions to keep services safe, functional, and fair.</p>
<p><b>Question 40: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response</p> <p>As discussed above, user sanctions policies are highly context-dependent. GitHub's Trust &amp; Safety team uses a range of tools and approaches to address violations based on their nature and severity. Enforcement is not a one-size-fits-all process: oftentimes, initial flags can be resolved through dialogue with the user rather than punitive action. This approach helps prevent unfair sanctions and preserves the integrity of collaborative projects.</p> <p>Many issues can be quickly remediated once the user understands the problem and takes corrective steps. Flexibility and engagement are essential to maintaining developer trust and supporting the developer ecosystem.</p>
<p><b>Question 41: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 42: Do you agree with our proposal to introduce age assessment appeals measures into the Illegal Content User-to-user Codes (ICU D15 and D16)? Please explain your reasoning.</b></p>	<p>Nil response.</p>
<p><b>Question 43: Do you agree with our proposed amendments to codify the definition of highly effective age assurance in the Protection of Children User-to-user Code? Please explain your reasoning.</b></p>	<p>Nil response.</p>
<p><b>Question 44: Do you agree with our proposed amendments to the Part 3</b></p>	<p>Nil response.</p>

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Highly Effective Age Assurance Guidance? Please explain your reasoning.	
Question 45: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.	Nil response.
Question 46: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.	Nil response.
Question 47: Do you agree with option A and option B in increasing the effectiveness of the ICU F1 and F2 measures?	Nil response.
Question 48: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.	Nil response.
Question 49: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.	Confidential? – N
Question 50: Do you agree with our proposed definition of ‘crisis’? Please explain your reasoning, and if possible, provide supporting evidence.	Confidential? – N
Question 51: Do you consider these measures to be effective for services that are not large services? Please provide any evidence on the role of services that are not large services during crises.	Nil response.

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<p><b>Question 52: Is there any evidence of best practice in responding to a crisis that we have not identified? Please explain your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 53: Do you agree with our assessment of the impacts (including costs) associated with this proposal? please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 54: Do you agree with our proposals? Please provide your reasoning, and if possible, provide supporting evidence.</b></p>	<p>Nil response.</p>
<p><b>Question 55: Do you agree with our assessment of the impacts (including costs) associated with this proposal? Please provide any relevant evidence which supports your position.</b></p>	<p>Nil response.</p>
<p><b>Question 56: Do you think our package of proposed measures is proportionate for services in scope of the Illegal Content User-to-User Codes, taking into account the existing package of measures, the impact on reducing the risk of relevant harms and the implications on different kinds of services?</b></p>	<p>Confidential? – N</p> <p>While these measures aim to address important harms, the overall package represents a substantial expansion of requirements under both the Illegal Content and Protection of Children Codes. For specialized platforms like GitHub, which host collaborative software development rather than traditional social content, the cost-benefit ratio of implementing these measures can be disproportionate. Many proposed obligations—such as extensive risk assessments, documentation, and proactive scanning—are designed for platforms with high volumes of consumer media, not for environments where content is technical, reused, and maintained by distributed contributors.</p> <p>Imposing uniform requirements risks diverting resources from core safety priorities and could undermine the open source ecosystem that enterprises and governments rely on. Mechanisms to prioritize actions and sequence implementation would help ensure that compliance remains proportionate to actual risk and that lessons learned inform future changes. This approach would advance safety without imposing unnecessary burdens on platforms with fundamentally different content and risk profiles.</p>

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<p><b>Question 57: Do you think our package of proposed measures is proportionate for services in scope of the Protection of Children User-to-User Code, taking into account the existing package of measures, the impact on reducing the risk of relevant harms and the implications on different kinds of services?</b></p>	<p>See above.</p>
<p><b>Question 58: In relation to our equality impact assessment, do you agree that some of our proposals would have a positive impact on certain groups? Please explain your reasoning and provide supporting evidence where possible.</b></p>	<p>Nil response.</p>
<p><b>Question 59: Do you consider that our proposals could have any negative impacts on certain groups? If so, please explain your reasoning.</b></p>	<p>Nil response.</p>
<p><b>Question 60: 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? If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</b></p>	<p>Nil response.</p>

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