

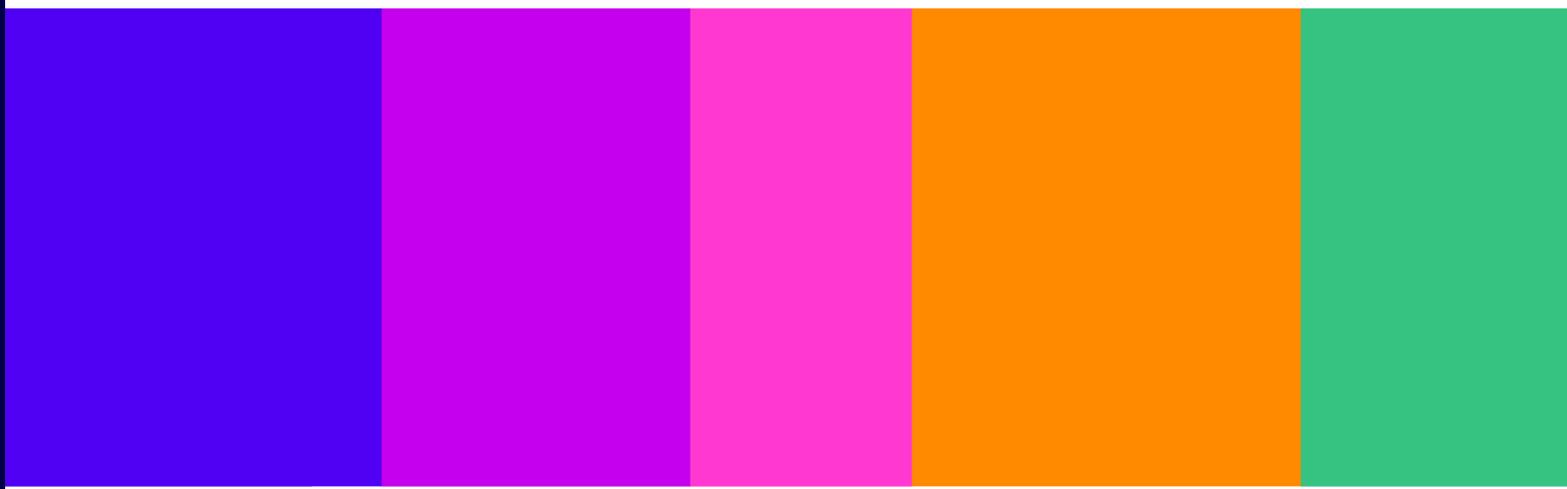
Protecting children from harms online

Volume 6: Illegal harms further consultation:
User Controls

Consultation

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1. Proposal to amend Measures ICU J1 (blocking and muting) and ICU J2 (disabling comments)

Overview

We are consulting on expanding the application of Measures ICU J1 and ICU J2 in the Illegal Content Codes of Practice, bringing providers of certain smaller user-to-user services that are likely to be accessed by children into scope of these measures where they have relevant risks and functionalities. We are proposing that providers should either use highly effective age assurance to offer child users the option to block and mute other users and disable comments on their content or should offer these controls to all users on the parts of the service that are accessible by children. The measures would still apply for all users in the case of providers of large user-to-user services with the relevant risks and functionalities, as currently set out in the Illegal Content Codes of Practice.

Enabling children to block or mute other users and disable comments can help them reduce the risk of encountering illegal content including grooming; encouraging or assisting suicide (or attempted suicide); hate; harassment, stalking, threats, and abuse; and coercive and controlling behaviour¹. We consider this proposal to be justified as it would extend the protection offered by these measures across more services likely to be accessed by children, reflecting the higher standard of protection for child users envisaged by the Online Safety Act 2023.

This proposal also responds directly to stakeholder feedback that recommended aligning these measures with equivalent measures in the Protection of Children Codes of Practice. The measures are outlined in the Protection of Children Statement, Volume 4, Section 18.

Consultation question:

Do you agree with our proposal? Provide any evidence to support your answer.

¹ Coercive and controlling behaviour is only in scope of the measure for blocking and muting of user accounts (ICU J1).

What we are proposing:

Measure	Proposed addition
ICU J1 User blocking and muting	<p>The measure would also apply to providers of user-to-user services likely to be accessed by children that have user profiles, have at least one of the following functionalities (user connections, posting content, user communication), and have:</p> <ul style="list-style-type: none">i) below seven million monthly UK users and high risk for at least one of coercive or controlling behaviour; harassment, stalking, threats and abuse; hate; grooming; encouraging or assisting suicide; orii) between 700,000 and seven million monthly UK users and medium risk for at least one of the relevant harms (as above).
ICU J2 Disabling comments	<p>The measure would also apply to providers of user-to-user services likely to be accessed by children that have the functionality of commenting on content, and have:</p> <ul style="list-style-type: none">i) below seven million monthly UK users and high risk for at least one of harassment, stalking, threats and abuse; hate; grooming; encouraging or assisting suicide; orii) between 700,000 and seven million monthly UK users and medium risk for at least one of the relevant harms (as above).

Introduction

- 1.1 The Online Safety Act 2023 (the Act) requires providers of regulated user-to-user services to take certain steps to reduce the risk of harm to users from illegal content. The requirements include taking proportionate measures relating to the design or operation of a service to mitigate and manage the risks of harm to individuals (section 10(2)). The Act states that one of the areas to which the duties apply is (where proportionate) “functionalities allowing users to control the content they encounter” (section 10(4)(f)).
- 1.2 In the December 2024 Statement on Protecting People from Illegal Harms Online (December 2024 Statement) and Illegal Content Codes of Practice,² we recommended user control measures for **large user-to-user service providers** with relevant functionalities that identified the risk of certain illegal harms. These included:
- a) **ICU J1**: Providers of large user-to-user services should offer every registered user the options to block and mute other user accounts on the service, if they have:

² The December 2024 Statement can be found [here](#) and the Illegal Content Codes of Practice can be found [here](#).

- identified as medium or high risk for any of coercive or controlling behaviour; harassment, stalking, threats and abuse; hate; grooming; encouraging or assisting suicide;
 - user profiles; and
 - at least one of the following functionalities: user connections; posting content; user communication (including but not limited to direct messaging and commenting on content).
- b) **ICU J2:** Providers of large user-to-user services should offer every registered user the option of disabling comments on their content, if they have:
- identified as medium or high risk for any of harassment, stalking, threats and abuse; hate; grooming; or encouraging or assisting suicide; and
 - the functionality of commenting on content.

- 1.3 We concluded that these measures would help to reduce the risk of harm to users. Specifically, enabling users to block or mute other users can help them reduce the risk of encountering illegal content posted by those users, such as harassment, stalking, threats and abuse, and coercive and controlling behaviour. Similarly, allowing users to disable comments can also help reduce exposure to illegal content posted in reply to their content, including harassment (such as instances of epilepsy trolling and cyberflashing) and hate. These offences are widespread and cause significant harm. We set out our assessment of the effectiveness of these user functionalities in the December 2024 Statement in Volume 2, Chapter 12 ‘User Controls’.
- 1.4 We decided to apply the blocking or muting and disabling comments measures to relevant **large** user-to-user service providers. However, we confirmed our intention to reconsider the case for extending measures ICU J1 and ICU J2 to smaller service providers, given we had proposed that similar measures apply to such service providers in the Protection of Children Codes of Practice (Protection of Children Codes).
- 1.5 Having reconsidered the issue, we are now proposing to expand the scope of the blocking or muting user accounts and disabling comments measures in the Illegal Content Codes of Practice (Illegal Content Codes) to apply to providers of certain smaller services that are likely to be accessed by children, and those providers should make these tools available to child users on the parts of the service that are accessible by children. This follows our consideration of the available evidence in totality, including the responses to our November 2023 Consultation on Protecting People from Illegal Harms Online (November 2023 Consultation)³ and our May 2024 Consultation on Protecting Children from Harms Online (May 2024 Consultation)⁴, and is in light of the decisions being taken in the Protection of Children Statement.
- 1.6 The remainder of this chapter explains the reasons for our proposal.

³ The Consultation on Protecting People from Illegal Harms Online (November 2023 Consultation) can be found [here](#).

⁴ The May 2024 Consultation on Protecting Children from Harms Online (May 2024 Consultation) can be found [here](#).

Our proposal

- 1.7 We are proposing to expand the service providers in scope of measures ICU J1 (blocking and muting) and ICU J2 (disabling comments) in our Illegal Content Codes to include the following (in addition to the large services described above):
- **ICU J1:** Providers of user-to-user services likely to be accessed by children that have user profiles, have at least one of the following functionalities (user connections, posting content, user communication), and have:
 - > below seven million monthly UK users and are at high risk for at least one of the following kinds of illegal harm: coercive or controlling behaviour; harassment, stalking, threats and abuse; hate; grooming; encouraging or assisting suicide; or
 - > between 700,000 and seven million monthly UK users and are at medium risk for at least one of the relevant kinds of illegal harm (as above).⁵
 - **ICU J2:** The measure would also apply to providers of user-to-user services likely to be accessed by children that have the functionality of commenting on content, and have:
 - > below seven million monthly UK users and are at high risk for at least one of the following kinds of illegal harm: harassment, stalking, threats and abuse; hate; grooming; encouraging or assisting suicide; or
 - > between 700,000 and seven million monthly UK users and are at medium risk for at least one of the relevant kinds of illegal harm (as above) and have over 700,000 monthly UK users.
- 1.8 We also recommend that providers give users information regarding these measures. This information must be easy to find and comprehensible based on the likely reading age of the youngest individual permitted to use the service without the consent of a parent or guardian. We set out this requirement in the December 2024 Statement, Volume 2, Chapter 12: User Controls.
- 1.9 These measures should apply to all UK users who have not been determined to be adults through the use of highly effective age assurance. That means, where providers do not use highly effective age assurance on their service, these measures should be applied to all UK users.^{6 7}
- 1.10 For the avoidance of doubt, the measures would still apply for all users in the case of large user-to-user services⁸ with the relevant functionalities and medium or high risk of the relevant harms, as currently set out in the Illegal Content Codes (Measures ICU J1 and ICU J2). Refer to the Illegal Harms Statement, Volume 2, Chapter 12: User Controls for more information on the pre-existing measures.

⁵ As calculated in accordance with the methodology set out in the Illegal Content Codes of Practice. See the December 2024 Statement 'Our approach to developing Codes measures' chapter for more information.

⁶ For brevity, elsewhere in this section we refer to 'users' rather than 'UK users'. However, for the avoidance of doubt the measures discussed only apply to UK users of the service (as defined in section 227(1) of the Act).

⁷ To note, we will be consulting on measures to help guide the use of age assurance for service providers in the upcoming consultation.

⁸ 'Large services' are those with more than seven million monthly active UK users.

Impact assessment

Benefits

- 1.11 We consider this proposal will reduce children’s exposure to illegal harms online. These measures, taken together, aim to ensure that service providers give children access to tools that allow them to determine the content they see on services, who can contact them and who can interact with them, and information that helps them to decide whether to engage with and trust content.
- 1.12 Enabling children to block or mute other users’ accounts and disable comments can help them reduce the risk of encountering a range of illegal content, such as grooming; encouraging or assisting suicide (or attempted suicide); hate; harassment, stalking, threats, and abuse; and coercive and controlling behaviour.⁹ These types of offences take place online and cause significant harm to children, including negatively impacting their victims and survivors. We set out the specific harms in the Illegal Harms Register of Risks (the Illegal Harms Register)¹⁰.
- 1.13 We are also aware of the relevant harms taking place on a variety of service types, including smaller services, with a wide range of relevant user functionalities such as direct messaging, livestreams, posting content and commenting on content being risk factors. We set out the relevant risk factors in the Register.
- 1.14 We explain in Volume 4, Section 18 of the Protection of Children Statement ¹¹ why we consider similar measures in the Protection of Children Codes would also be effective in protecting child users against the following categories of priority content that are harmful to children: bullying; abuse and hate content; violent content; suicide, self-harm and eating disorder content. Much of the evidence on these harms also applies to the kinds of illegal harm to which these proposed measures apply, given the similarities in how they manifest online and how children experience them.¹² We set out this evidence in the Guidance on Content Harmful to Children.¹³ While we consider that these measures would benefit all users, the reasons outlined in the Protection of Children Statement show they would be especially helpful for children. These reasons also support extending the proposed measures to better protect children from the specific illegal harms identified.
- 1.15 Given the prevalence of these harms and the severity of the impact they have, we consider that expanding the application of these measures as proposed would deliver significant benefits to users.

⁹ The offence of coercive and controlling behaviour cannot be committed against children under 16. However, Chapter 5 of our Register of Risk sets out evidence that age is a risk factor for this type of harm, with younger women being impacted most, including those aged under 18. [Register of Risks](#), Chapter 5, ‘Risk factors: User base’.

¹⁰ The [Register of Risks](#), Section 2, ‘Register of Risks and Risk Profiles’ can be found [here](#).

¹¹ See paragraphs 18.51, 18.52, 18.61 to 18.68, and 18.133 to 18.136 in Volume 4, Section 18 of the Protection of Children Statement for full details.

¹² Evidence on bullying and abuse is relevant to harassment, stalking, threats and abuse. Evidence on hate as a category of priority content that is harmful to children is relevant to the illegal harm of hate. Evidence on suicide as a category of priority content that is harmful to children is relevant to the illegal harm of encouraging or assisting suicide.

¹³ The Guidance on Content Harmful to Children can be found in Volume 2, Section 6 of the Protection of Children Statement.

Costs

1.16 We consider that implementing and maintaining the proposed user functionalities would have a cost impact for service providers not currently offering them. We set out the direct and indirect costs associated with this proposal below. We expect the service providers that will be impacted by this proposal are those that are not already in scope of either the Illegal Content Codes (Measures ICU J1 and ICU J2) or the Protection of Children Codes (Measures PCU J1 and PCU J2).¹⁴ In practice, we expect this to be a very small number of services. Given the similarities between the harms to which the Illegal Content measures and Protection of Children measures apply, it is likely that many providers who would be in scope of the proposed expansion of the former are already in scope of the latter.

Direct costs

- 1.17 For ICU J1, we estimate that a relevant service provider that does not offer block and mute functionalities as laid out in this proposed measure would incur a one-off cost to make changes in line with this measure of between £10,000 to £150,000 and incur maintenance costs of approximately £2,500 to £37,500 per year.¹⁵ We estimated a wide cost range, which reflects that there is likely to be considerable variation across service providers, that will depend on factors including the complexity of the provider's systems and the service's functionalities, and the nature of how users interact on a service. We estimate that costs are likely to increase for larger services which tend to be more complex, but we cannot be confident that costs to small services would be at the low end of the estimated range. In some cases, service providers already have the measure (or parts of it) in place, meaning the costs for these services may be lower.¹⁶
- 1.18 For ICU J2, a relevant service provider that does not already offer users the option to disable comments on their posts would incur a one-off cost to make changes in line with this measure of between £2,000 to £50,000 and incur maintenance costs of approximately £500 to £12,500 per year. We estimated a wide range of direct costs, which reflects uncertainty, and we cannot be confident that the costs to small services would be at the low end of our estimated range. In some cases, service providers may already have the measure (or parts of it) in place, and the costs for these services may be lower.¹⁷
- 1.19 We recommend that in-scope service providers make these user controls known to users, including setting out the effect of using these tools, and that this information is easy to find and comprehensible.¹⁸ We have estimated the direct costs of this component for each measure would cost in the region of £200 to £10,000 as a one-off cost, with annual maintenance costs of £50 to £2,500 per year.^{19 20}

¹⁴ These are expected to be smaller services that are likely to be accessed by children that identify risk of relevant types of illegal content but have not identified a relevant risk of the types of content specified in measures PCU J1 and/or PCU J2 in the Protection of Children Codes.

¹⁵ For more details on cost assumptions see Illegal Harms Statement Annex 5: Assumptions on costs and further analysis on costs and benefits.

¹⁶ See paragraphs 12.84 to 12.90 in our December 2024 Statement for full details.

¹⁷ See paragraphs 12.99 to 12.102 in our December 2024 Statement for full details.

¹⁸ See Illegal Content Codes measures ICU J1.7 and J2.4.

¹⁹ See paragraphs 12.110 to 12.112 in our December 2024 Statement for full details.

²⁰ While this provision is not included in the Protection of Children Codes, there are additional measures in those Codes to ensure that children understand the user tools available to them and can access appropriate support (PCU F1 and PCU F2).

- 1.20 Specifically, this proposal impacts service providers that are likely to be accessed by children. We expect service providers to apply these measures to all users who have not been determined to be adults using highly effective age assurance. If a service provider uses highly effective age assurance to target the measures, they may incur costs related to implementing age assurance and using this age information to ensure that children have the support tools available to them. We set out the associated costs for age assurance in Section 13 and Annex 3.²¹ We note that providers that already have highly effective age assurance or have been recommended to implement it as part of other measures will have already incurred most of this cost. Alternatively, service providers can apply the measure to all users and not incur costs of highly effective age assurance.

Indirect costs

- 1.21 We recognise that these proposed measures could result in indirect costs to providers related to the impact of the measure in reducing engagement and usage rates, thereby reducing revenue.
- 1.22 For ICU J1, this impact would vary based on interaction between user accounts differs across user-to-user services, according to the functionalities that are employed. For instance, global blocking of all non-connected users could fundamentally alter the community or usage of a site, and users cannot interact with or see content created by other unknown users if they choose to use this tool. However, it is not necessarily always the case that use of a service and revenue will fall. While the overall effect on engagement may be negative for some users, there may be a countervailing positive impact for other users. For example, users may stop using services where they encounter harmful content. Therefore, if users feel safer online due to the availability of blocking and muting tools, they may use a service more.²²
- 1.23 For ICU J2, if users were to disable comments on a widespread basis and reduce comment activity on a service, this could impact the ability of users to interact with content. However, we noted that often users may inherently value allowing commenting on their posts (or even be posting in order to receive comments), and so we consider it unlikely that the measure would result in the widespread removal of comments in most cases. Giving users the ability to disable comments may also deliver some counterbalancing indirect benefits to services by preventing some users from leaving or disengaging with a service which might otherwise happen when they encounter harmful content through comments on their posts and cannot disable these.²³
- 1.24 Our assessment of the impact on service providers that are in scope of this measure is consistent with both the December 2024 Statement (Volume 2, Section 12) and the Protection of Children Statement (Volume 4, Section 18). Refer to these statements for more information on our assessments.

Rights assessment

- 1.25 Users choosing to block or mute other users and/or disable comments are exercising their rights to freedom of expression and freedom of association by limiting the information they

²¹ See Section 13: Age assurance, and Annex 3: Further detail on economic assumptions and analysis for details on the cost of highly effective age assurance if a provider chooses to use this to target this measure.

²² See paragraphs 12.91 to 12.98 in our December 2024 Statement for full details.

²³ See paragraphs 12.103 to 12.109 in our December 2024 Statement for full details.

impart and the people they associate with. We also consider these measures might have positive benefits for users' rights to privacy in that it would give them additional options for deciding how to share their personal information and content online.

- 1.26 We do not consider these measures to interfere with the right to freedom of expression, association of users, or user privacy. Our assessment of the impact on users' rights is consistent with both the December 2024 Statement (Volume 2, Section 12) and Protection of Children Statement (Volume 4, Section 18). Refer to these statement chapters for more information.

Who these proposed measures apply to

- 1.27 As explained above, when reaching a decision on our Illegal Content Codes, we recognised that we had proposed that the Protection of Children measures apply to smaller services, and said we would revisit the scope of the illegal harms measures when reaching a decision in our Protection of Children Statement. Based on the available evidence and stakeholder comments on both the Illegal Harms and Protection of Children measures, we have decided that the Protection of Children measures should apply to providers of certain smaller services likely to be accessed by children in respect of the parts of the service that are accessible by children, in particular for the reasons set out in Volume 4, Section 18 of that statement.²⁴ We have explained above in paragraph 1.15 that the evidence supporting the Protection of Children measures is also relevant to the kinds of illegal harm to which the corresponding measures in the Illegal Content Codes apply because of the similarity in how the harms manifest online and are experienced by children.
- 1.28 We have now considered the available evidence and responses to our November 2023 Consultation and May 2024 Consultation in their totality. In light of this, our decision in the Protection of Children Statement, and that children should be offered a higher standard of protection online,²⁵ we have reached the provisional view that, in addition to those services already in scope of these measures in the Illegal Content Codes, it would be proportionate to recommend the measures apply to providers of services likely to be accessed by children that are either high risk for the relevant illegal harms (see above), or medium risk for the relevant harms (see above) and have over 700,000 monthly UK users. In particular:
- a) For high-risk services that are not in scope of the equivalent Protection of Children measures, we expect that the absence of these tools could lead to significant unaddressed harm which is potentially severe and therefore we consider the tools proportionate regardless of size.
 - b) For medium-risk services, we have provisionally concluded that it would be proportionate to apply to providers with over 700,000 monthly UK users. This size threshold is expected to capture a wide range of services which are popular amongst children in the UK below our definition of a 'large' service (over seven million monthly UK users). We consider that these measures would provide material benefits to users on these services, and that these providers would be able to manage the impacts of the measures on their services.
 - c) We expect that smaller services with fewer than 700,000 monthly UK users and a medium risk of harm would struggle to implement the measure in a way that increases

²⁴ See paragraphs 18.116 to 18.122 and 18.172 to 18.176 of Volume 4, Section 18 in the Protection of Children Statement for full details.

²⁵ Section 3(4A)(b) of the Communications Act 2003 and paragraph 4(a)(vi) of Schedule 4 to the Act.

protection from illegal content without material adverse effects for users. In particular, smaller services will have more limited resources, and the implementation of these measures may be challenging and, in some cases, require a significant overhaul of the service's systems and architecture. As a result, we are not proposing that these measures would apply to services with fewer than 700,000 monthly UK users that are medium risk only. Our assessment is that the smallest services that are not high risk would meet their Illegal Content Duties more effectively by focusing on the many other measures recommended in our codes.

- 1.29 For the avoidance of doubt, in terms of size of service and risk level, we have recommended the same scope of service providers apply the measures for blocking or muting user accounts (PCU J1) and disabling comments (PCU J2) in the Protection of Children Codes (for relevant types of content harmful to children). Given the expanded application of these measures is intended to provide greater protection to children from the identified illegal harms, we consider it proportionate to recommend that smaller providers need only implement these measures in respect of the parts of the service that are accessible by children (though they may choose to apply it to the whole service if that would be easier).
- 1.30 We recognise that these measures will not apply to smaller services that are not likely to be accessed by children and that the user tools may not be offered to all adult users on smaller services likely to be access by children where a provider uses highly effective age assurance to target the measures at children. We recognise that these measures may potentially have benefits for adult users in these instances, but we are not proposing to extend the measures to them at this time. We will continue to collect evidence of the effectiveness and costs of these measures at protecting users from illegal harms and may consider extending them further in future iterations of the Codes.

Provisional conclusion

- 1.31 Taking into consideration the factors discussed in this section, we are of the view that expanding the scope of service providers required to provide children with user functionalities of blocking or muting user accounts and disabling comments would deliver important protections against the specified kinds of illegal harm.
- 1.32 We recognise that our proposal may incur significant costs for service providers. We have detailed these costs in the 'Costs' sub-section. However, given the severity and prevalence of the relevant illegal harms, such as grooming, encouraging or assisting suicide (or attempted suicide), hate, harassment, stalking, threats, and abuse, and coercive and controlling behaviour, and the important role blocking or muting user accounts and disabling comments can play in tackling these harms, we provisionally consider that our proposal is proportionate.
- 1.33 The measures would be included in our Codes of Practice for CSEA and for other duties. The draft consolidated text of our Code measure is set out in Volume 6, Annex 1.

A1. Statutory tests and impact assessments

A1.1 This annex outlines our assessment of the relevant statutory tests for making the proposals, pertaining to the Illegal Content Codes of Practice measures ICU J1 and ICU J2, and both the Equality Impact Assessment and Welsh language assessment for these proposals.

Statutory tests

A1.2 We consider our proposals would be consistent with the general principles and objectives for Codes of Practice contained in Schedule 4 of the Act and section 3 of the Communications Act 2003. We explained in Chapter 14 of the December 2024 Statement why our Illegal Content Codes satisfied these principles and objectives. We consider that reasoning to apply here, and that the statutory tests would be better met by these proposals. In particular, we have considered the appropriateness of the measure to different kinds and sizes of services, and to providers of different sizes and capacities. This is reflected in our proposals on the service providers to which these measures would be extended, which take into account the size, capacity and risk profile of the service. We have also had regard to the principles in paragraph 2 of Schedule 4 and consider our proposals to be compatible with the pursuit of the online safety objectives: we consider our proposals to be clear as to their application; sufficiently clear and detailed for providers to understand what the measures would entail in practice; proportionate and technically feasible for the providers in scope; and that the proposed extension of their application would ensure a higher standard of protection for children than adults on the services in scope.

A1.3 Chapter 14 of the December 2024 Statement also explained why we considered our Illegal Content Codes to be consistent with our general duties under the Communications Act 2003. We also consider that reasoning to apply here and that these duties would be better met by our proposals. In particular:

- a. We consider these proposals to be consistent with our general duty to further the interests of citizens in relation to communication matters, and further the interests of consumers in relevant markets, including where appropriate by promoting competition, by extending the protection of measures ICU J1 and J2 to a greater number of users across more services.²⁶
- b. We also consider they would secure the adequate protection of citizens from the harm presented by content on regulated services, through providers using appropriate systems and processes designed to reduce the risk of harm.²⁷
- c. In formulating these proposals, we have had regard to the principles that regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed²⁸ – the reasons for our proposals,

²⁶ Section 3(1) of the Communications Act 2003.

²⁷ Section 3(2)(g) of the Communications Act 2003.

²⁸ Section 3(3) of the Communications Act 2003.

and why we consider them to be necessary and appropriate, are set out in this annex.

- d. Further, we have had regard to the factors as relevant set out in section 3(4A) of the Communications Act 2003, in particular the need for a higher level of protection for children than for adults.
- e. We have also considered the vulnerability of children and of others whose circumstances put them in need of special protection.²⁹

Equality impact assessment

- A1.4 We have given careful consideration as to whether the proposals in this consultation will have a particular impact on persons sharing protected characteristics (including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents, and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us to comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998.
- A1.5 We explained at paragraphs A4.25 and A4.26 of Annex 4 to the December 2024 Statement apply that our measures on allowing users to block and mute other user accounts, and to disable comments, should positively impact those with protected characteristics, including women who tend to disproportionately face issues online such as harassment and stalking. These measures should also positively affect people from different races, religions, sexual orientation, those with disabilities, those of different political opinions and those who have undergone gender reassignment, as they too tend to disproportionately experience certain types of abuse, including hate speech (where relevant) and harassment. Indeed, by extending the application of these measures to protect more users, we expect the positive impact of these measures to be greater.

Welsh language assessment

- A1.6 The Welsh language has official status in Wales. To give effect to this, certain public bodies, including Ofcom, are required to comply with Welsh language standards.³⁰ Accordingly, we have considered:
- the potential impact of our policy proposals on opportunities for persons to use the Welsh language;
 - the potential impact of our policy proposals on treating the Welsh language no less favourably than the English language; and
 - how our proposals could be formulated so as to have, or increase, a positive impact; or not to have adverse effects or to decrease any adverse effects.
- A1.7 We do not expect our proposals to affect the opportunities for persons to use the Welsh language, nor to treat the Welsh language any less favourably than the English language. We do not consider our proposals could be formulated so as to have a positive impact, and we do not expect there to be any adverse effects to decrease.

²⁹ Section 3(4) of the Communications Act 2003.

³⁰ The Welsh language standards with which Ofcom is required to comply are available on our website.

Cumulative impact assessment

- A1.8 We have also assessed how these proposals would contribute to the cumulative impact of our Codes of Practice, having had regard to Chapter 13 of the December 2024 Statement. Taking into account the significant risk of illegal harm to children that these proposals would mitigate, we consider that the cumulative impact of our Codes of Practice, if we were to implement these proposals, would be proportionate.

A2. Proposed Changes to Illegal Harms Measure ICU J1 and ICU J2 in Markup

A2.1 This document outlines the proposed changes to measures ICU J1 and ICU J2 in markup.

ICU J1 (User blocking and muting)

A2.2 The below table outlines the proposed changes to measure ICU J1 in markup.

Application	
ICU J1.1	<p>This measure applies to a provider in respect of each service it provides that meets all of the following conditions:</p> <ul style="list-style-type: none"> a. users of the service have user profiles; b. the service has at least one of the following functionalities: <ul style="list-style-type: none"> i. user connection functionality; ii. posting content functionality; iii. user communication (including but not limited to: (1) direct messaging functionality; and (2) commenting on content); and c. the service meets the description in: <ul style="list-style-type: none"> i. ICU J1.2, ii. ICU J1.3; or iii. ICU J1.4.
ICU J1.2	<p>The description is that the service:</p> <ul style="list-style-type: none"> a. is a large service; and it provides that meets all of the following conditions: b. the service is at medium or high risk of one or more of the following kinds of illegal harm: <ul style="list-style-type: none"> i. grooming; ii. encouraging or assisting suicide (or attempted suicide); iii. hate; iv. harassment, stalking, threats and abuse; v. controlling or coercive behaviour. c. users of the service have user profiles; and d. the service has at least one of the following functionalities: <ul style="list-style-type: none"> i. user connection functionality; ii. posting content functionality; iii. user communication (including but not limited to: (1) direct messaging functionality; and (2) commenting on content);
ICU J1.3	<p>The description is that the service:</p> <ul style="list-style-type: none"> a. has below seven million monthly active UK users; b. is likely to be accessed by children; and c. is at high risk of one or more of the following kinds of illegal harm:

	<ul style="list-style-type: none"> i. <u>grooming</u>; ii. <u>encouraging or assisting suicide (or attempted suicide)</u>; iii. <u>hate</u>; iv. <u>harassment, stalking, threats and abuse</u>; v. <u>controlling or coercive behaviour</u>.
ICU J1.4	<p>The description is that the service:</p> <ul style="list-style-type: none"> a. has between 700,000 and seven million monthly active UK users; b. is likely to be accessed by children; and c. is at medium risk of one or more of the following kinds of illegal harm: <ul style="list-style-type: none"> i. <u>grooming</u>; ii. <u>encouraging or assisting suicide (or attempted suicide)</u>; iii. <u>hate</u>; iv. <u>harassment, stalking, threats and abuse</u>; v. <u>controlling or coercive behaviour</u>.
Recommendation	
ICU J1.5	<p>In this Recommendation:</p> <p>“applicable user” means:</p> <ul style="list-style-type: none"> a. in relation to a service which meets the description in ICU J1.2, a <i>registered United Kingdom user</i>; b. in relation to a service which meets the description in either ICU J1.3 or ICU J1.4, a registered relevant user. <p>“registered relevant user” means:</p> <ul style="list-style-type: none"> a. where the provider uses highly effective age assurance for the purpose of establishing which <i>United Kingdom users</i> of the service are child users, a registered user assessed to be a child user; or b. otherwise, a registered <i>United Kingdom user</i> of the service.
ICU J1.6	<p>If this Recommendation applies because the service meets the description in ICU J1.3 or ICU J1.4, then ICU J1.7 and ICU J1.9 apply in relation to any child-accessible part of the service which has user connection functionality, posting content functionality or user communication (including but not limited to direct messaging functionality and commenting on content functionality).</p>
ICU J1.7	<p>The provider should offer every <i>registered United Kingdom user applicable user</i> the option to block each of:</p> <ul style="list-style-type: none"> a. a specific user account, whether or not connected to that <i>registered United Kingdom user applicable user’s</i> user account; and b. where the service has user connection functionality, all user accounts which are not connected to that <i>registered United Kingdom user applicable user’s</i> user account.
ICU J1.8	<p>“Block” means to take action that will result in:</p> <ul style="list-style-type: none"> a. blocked users being unable to send direct messages from the blocked account to the blocking account; b. blocking users being unable to send direct messages from the blocking account to the blocked account; c. the blocking user being unable to encounter, by means of the blocking account, any content posted on the service using the blocked account (regardless of where on the service it is posted),

	<p>including but not limited to: (i) reactions to content; and (ii) content posted using the blocked account which is subsequently posted by another user;</p> <p>d. the blocked user being unable to encounter, by means of the blocked account, any content posted on the service using the blocking account (regardless of where on the service it is posted), including but not limited to: (i) reactions to content; and (ii) content posted using the blocking account which is subsequently posted by another user; and</p> <p>e. the blocking account and blocked account, if they were connected, no longer being connected,</p> <p>and “blocking” is to be read accordingly.</p> <p>“Blocking account” means the user account through which the action resulting in blocking has taken place. “Blocked account” means the user account that action has been taken against.</p> <p>“Blocking user” means the user operating the blocking account. “Blocked user” means the user operating the blocked account.</p>
ICU J1.9	<p>The provider should offer every registered United Kingdom user applicable user the option to mute other user accounts (whether or not connected to that registered United Kingdom user applicable user’s user account) on the relevant service.</p>
ICU J1.10	<p>“Mute” means to take action that will result in the muting user being unable to encounter any content posted on the service using the muted account, including:</p> <p>a. reactions to content posted using the muted account; and</p> <p>b. content posted using the muted account which is posted by another user,</p> <p>by means of the muting account, unless the muting user visits the user profile associated with the muted account, in which case the muting user will experience that user profile as if the muted account had not been muted. “Muting” is to be read accordingly.</p> <p>“Muting account” means the user account through which the action resulting in muting has taken place. “Muted account” means the user account that the action has been taken against.</p> <p>“Muted user” means the user operating the muted account. “Muting user” means the user operating the muting account.</p>
ICU J1.11	<p>For the avoidance of doubt:</p> <p>a. save for where muting is reciprocal, muted users should continue to encounter the content posted using the muting account;</p> <p>b. functionality from the muted user’s perspective should continue as if the muting user had not muted the muted account; and</p> <p>c. providers should not at any time notify muted users, or otherwise make them aware, that the muted account has been muted by the muting user.</p>

	d. Muting is reciprocal where a user has through a user account (“A”) muted a user account (“B”), and a user has through user account B also muted user account A.
ICU J1.12	The provider should provide information to United Kingdom users about the availability of the options to block and mute other users and the effect of these actions, including the types of interactions or access to content that it would restrict. That information should be: <ul style="list-style-type: none"> a. easy to find; and b. comprehensible based on the likely reading age of the youngest individual permitted to use the service without the consent of a parent or guardian.

ICU J2 (Disabling comments)

A2.3 The below table outlines the proposed changes to measure ICU J2 in markup.

Application	
ICU J2.1	This measure applies to a provider in respect of each service it provides that meets all of the following conditions: <ul style="list-style-type: none"> a. the service has commenting on content functionality; and b. the service meets the description in: <ul style="list-style-type: none"> i. ICU J1.2, ii. ICU J1.3; or iii. ICU J1.4.
ICU J2.2	The description is that the service: This measure applies to a provider in respect of each large service it provides that meets both of the following conditions: <ul style="list-style-type: none"> a. is a large service; and b. the service is at medium or high risk of one or more of the following kinds of illegal harm: <ul style="list-style-type: none"> i) <u>grooming</u>; ii) <u>encouraging or assisting suicide (or attempted suicide)</u>; iii) <u>hate</u>; iv) <u>harassment, stalking, threats and abuse</u>; and c. the service has commenting on content functionality.
ICU J2.3	The description is that the service: <ul style="list-style-type: none"> a. has below seven million monthly active UK users; b. is likely to be accessed by children; and c. is at high risk of one or more of the following kinds of illegal harm: <ul style="list-style-type: none"> i. <u>grooming</u>; ii. <u>encouraging or assisting suicide (or attempted suicide)</u>; iii. <u>hate</u>; iv. <u>harassment, stalking, threats and abuse</u>.
ICU J2.4	The description is that the service: <ul style="list-style-type: none"> a. has between 700,000 and seven million monthly active UK users; b. is likely to be accessed by children; and

	<p>c. is at medium risk of one or more of the following kinds of illegal harm:</p> <ul style="list-style-type: none"> i. <u>grooming</u>; ii. <u>encouraging or assisting suicide (or attempted suicide)</u>; iii. <u>hate</u>; iv. <u>harassment, stalking, threats and abuse</u>.
Recommendation	
ICU J2.5	<p>In this Recommendation:</p> <p>“applicable user” means:</p> <ul style="list-style-type: none"> a. in relation to a service which meets the description in ICU J2.2, a registered <i>United Kingdom user</i>; b. in relation to a service which meets the description in either ICU J2.3 or ICU J2.4, a registered relevant user. <p>“registered relevant user” means:</p> <ul style="list-style-type: none"> a. where the provider uses highly effective age assurance for the purpose of establishing which <i>United Kingdom users</i> of the service are child users, a registered user assessed to be a child user; or b. otherwise, a registered <i>United Kingdom user</i> of the service.
ICU J2.6	<p>If this Recommendation applies because the service meets the description in ICU J2.3 or ICU J2.4, then PCU J2.7 and PCU J2.8 apply in relation to any child-accessible part of the service which has commenting on content functionality.</p>
ICU J2.7	<p>The provider should offer every registered United Kingdom user applicable user the option of preventing any other users of the service from commenting on content posted on the service using their user account.</p>
ICU J2.8	<p>registered United Kingdom user Applicable users should be able to exercise the option referred to above:</p> <ul style="list-style-type: none"> a. when posting content; and b. after having posted content.
ICU J2.9	<p>The provider should provide information to <i>United Kingdom users</i> about the availability of the option to prevent other users of the service from commenting on content posted on the service by the <i>United Kingdom user</i> concerned and the effect of this action, including the types of interactions or access to content that it would restrict. That information should be:</p> <ul style="list-style-type: none"> a. easy to find; and b. comprehensible based on the likely reading age of the youngest individual permitted to use the service without the consent of a parent or guardian.

A2.4 The following consequential changes would also be made:

A2.5 In the Index of recommended measures, the application of ICU J1 and ICU J2 would be amended in accordance with the amended application of the measures.

A2.6 In Table A, the cross references in the definitions of Block, Blocking, Blocked user and Blocking user; and Mute, Muting, Muted user and Muting user would be updated to reflect the amended numbering.

- A2.7 In Table A, definitions of “applicable user” and “registered relevant user”, for the purposes of measures J1 and J2, and cross referencing the definitions included in measures J1 and J2, would be inserted in their alphabetical place.
- A2.8 Definitions of “highly effective age assurance” and “child accessible part”, identical to those included in the Protection of Children Code of Practice for user-to-user services, would be added to end of the definitions section of the CSEA and other duties Codes.

A3. Responding to this consultation

How to respond

- A3.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on July 22, 2025.
- A3.2 You can download a response form from <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/consultation-illegal-harms-user-controls/>. You can return this by email or post to the address provided in the response form.
- A3.3 If your response is a large file, or has supporting charts, tables or other data, please email it to IHconsultation@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A3.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Illegal harms further consultation: User Controls
Ofcom Online Safety Team
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A3.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A3.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).
- A3.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A3.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A3.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex X. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A3.10 If you want to discuss the issues and questions raised in this consultation, please contact IHconsultation@ofcom.org.uk.

Confidentiality

- A3.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.
- A3.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A3.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A3.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A3.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A3.16 Following this consultation period, Ofcom plans to publish a statement in Summer 2026.
- A3.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A3.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 4.
- A3.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A3.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A4. Ofcom's consultation principles

A4.1 Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

A4.2 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A4.3 We will be clear about whom we are consulting, why, on what questions and for how long.
- A4.4 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
- A4.5 When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses.
- A4.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A4.7 If we are not able to follow any of these principles, we will explain why.

After the consultation

A4.8 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A5. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- > Nothing
- > Name/contact details/job title
- > Whole response
- > Organisation
- > Part of the response

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes No

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A6. Consultation questions

Please tell us how you came across about this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

Proposal to amend Measures ICU J1 (blocking and muting) and ICU J2 (disabling comments)

Question 1:

Do you agree with our proposal? Provide any evidence to support your answer.