Statement at a glance: our decisions and who they apply to

1.1 This document summarises the decisions we are making in our Illegal Harms statement (the "Statement") and outlines which services they relate to. In order it sets out:

- The measures we are recommending for user-to-user (U2U) services;
- The measures we are recommending for search services;
- Our guidance for risk assessment duties, applicable to all U2U and search services; and
- Our guidance for record-keeping and review duties, applicable to all U2U and search services.

1.2 For a broad definition of the different kinds of services see the glossary in Annex 3. Full definitions (including relevant exemptions) are set out in the Online Safety Act (the "Act").

1.3 Nothing in this document should be taken to affect what is set out in the Statement (in the event of any inconsistency, the Statement prevails).

Measures applied to U2U services and search services

1.4 Table 1 and Table 2 below set out the measures we are recommending for providers of U2U services and search services, respectively. Each of the rows in the tables represents a different measure. The measures are in the same order as they appear in the Codes themselves.

1.5 The different columns show how the measure applies in relation to different groups of services. This is to reflect that whether some of the measures are recommended for a provider of a particular service can depend on the size of the service and how risky it is.

1.6 First, the columns are divided into two groups by size:

- Large services. We define a service as large where it has an average user base greater than 7m monthly active UK users, approximately equivalent to 10% of the UK population.
- Smaller services. These are all services that are not large and will include services provided by small and micro businesses.

1.7 Second, we sub-divide each of these broad size categories into three sub-groups. They depend on the outcome of a service's risk assessment for the 17 kinds of priority illegal harms set out in the Risk Assessment Guidance:[1]

- 'Low-risk' refers to a service which the provider has assessed as being low risk for all kinds of illegal harm.
- 'Single-risk' refers to a service which the provider has assessed as being medium or high risk for just one kind of illegal harm.

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[1] This assumes that the provider has carried out a suitable and sufficient risk assessment, as required by the Act. The 17 different kinds of illegal harm set out in Ofcom's Risk Assessment Guidance are: terrorism; child sexual exploitation and abuse; hate; harassment, stalking, threats and abuse; controlling or coercive behaviour; intimate image abuse; extreme pornography; sexual exploitation of adults; human trafficking; unlawful immigration; fraud and financial offences; proceeds of crime; drugs and psychoactive substances; firearms, knives and other weapons; encouraging or assisting suicide; foreign interference; animal cruelty.

- 'Multi-risk' refers to a service which the provider has assessed as being medium or high risk for at least two different kinds of illegal harms.

1.8   The resulting columns show six different groups of services. For each group of services (for example, smaller low risk for all kinds of harm), Table 1 and Table 2 show whether a measure is recommended for them:

- If a measure is recommended for all the providers in a given group of services, this is highlighted in amber (and includes the word 'Applies').
- If the measure is only recommended for some providers in a given group, this is highlighted in light orange. In most instances it includes the word 'Applies to some' and footnotes to explain the detail of who the recommendation applies to. For example, the recommendation to implement some measures depends on whether the service is risky for specified kinds of illegal harm or has relevant functionalities. In some instances, the table includes the specific service types (for example, category 1A or general search).

Table 1: Measures for U2U services

Measure number	Name of the measure	Smaller service			Large service		
		Low-risk	Single-risk	Multi-risk	Low-risk	Single-risk	Multi-risk
Governance and accountability							
ICU A1	Annual review of risk management activities				Applies	Applies	Applies
ICU A2	Individual accountable for illegal content safety duties and reporting and complaints duties	Applies	Applies	Applies	Applies	Applies	Applies
ICU A3	Written statements of responsibilities			Applies	Applies	Applies	Applies
ICU A4	Internal monitoring and assurance						Applies
ICU A5	Tracking evidence of new and increasing illegal harm			Applies	Applies	Applies	Applies
ICU A6	Code of conduct regarding protection of users from illegal harm			Applies	Applies	Applies	Applies
ICU A7	Compliance training			Applies	Applies	Applies	Applies
Content moderation							
ICU C1	Having a content moderation function to review and assess suspected illegal content	Applies	Applies	Applies	Applies	Applies	Applies

Measure number	Name of the measure	Smaller service			Large service		
		Low-risk	Single-risk	Multi-risk	Low-risk	Single-risk	Multi-risk
ICU C2	Having a content moderation function that allows for the swift take down of illegal content	Applies	Applies	Applies	Applies	Applies	Applies
ICU C3	Setting internal content policies			Applies	Applies	Applies	Applies
ICU C4	Performance targets (for its content moderation function)			Applies	Applies	Applies	Applies
ICU C5	Prioritisation (of content for review)			Applies	Applies	Applies	Applies
ICU C6	Resourcing (of content moderation function)			Applies	Applies	Applies	Applies
ICU C7	Provision of training and materials to individuals working in content moderation (non-volunteers)			Applies	Applies	Applies	Applies
ICU C8	Provision of materials to volunteers			Applies	Applies	Applies	Applies
Automated content moderation							
ICU C9	Using hash matching to detect and remove CSAM		Applies to some[2]	Applies to some[2]		Applies to some[2]	Applies to some[2]
ICU C10	Detecting and removing content matching listed CSAM URLs		Applies to some[3]	Applies to some[3]		Applies to some[3]	Applies to some[3]
Reporting and complaints							
ICU D1	Enabling complaints	Applies	Applies	Applies	Applies	Applies	Applies
ICU D2	Having an easy to find, easy to access, and easy to use complaints system and processes	Applies	Applies	Applies	Applies	Applies	Applies

[2] Applies to providers of large services that are at medium or high risk of image-based CSAM, or services that are at high risk of image-based CSAM and (a) have more than 700,000 monthly active United Kingdom users or (b) are file-storage and file-sharing services.

[3] Applies to providers of large services that are at medium or high risk of CSAM URLs or services that have more than 700,000 monthly active United Kingdom users and are at high risk of CSAM URLs.

Measure number	Name of the measure	Smaller service			Large service		
		Low-risk	Single-risk	Multi-risk	Low-risk	Single-risk	Multi-risk
ICU D3	Provision of information prior to the submission of a complaint		Applies to some [4]	Applies to some[4]	Applies to some[4]	Applies to some[4]	Applies to some[4]
ICU D4	Appropriate action - sending indicative timelines		Applies	Applies	Applies	Applies	Applies
ICU D5	Appropriate action - sending further information about how the complaint will be handled		Applies to some[5]	Applies to some[5]	Applies to some[5]	Applies to some[5]	Applies to some[5]
ICU D6	Opt out from communications following a complaint		Applies	Applies	Applies	Applies	Applies
ICU D7	Appropriate action for relevant complaints about suspected illegal content	Applies	Applies	Applies	Applies	Applies	Applies
ICU D8	Appropriate action for relevant complaints which are appeals – determination (large or multi risk services)			Applies	Applies	Applies	Applies
ICU D9	Appropriate action for relevant complaints which are appeals – determination (services that are neither large nor multi risk)	Applies	Applies				
ICU D10	Appropriate action for relevant complaints which are appeals – action following determination	Applies	Applies	Applies	Applies	Applies	Applies
ICU D11	Appropriate action for relevant complaints about proactive technology, which are not appeals	Applies	Applies	Applies	Applies	Applies	Applies
ICU D12	Appropriate action for all other relevant complaints	Applies	Applies	Applies	Applies	Applies	Applies
ICU D13	Exception: manifestly unfounded complaints	Applies	Applies	Applies	Applies	Applies	Applies

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[4] Applies to providers of services likely to be accessed by children that are either large or at medium or high risk of any kind of illegal harm.
[5] Applies to providers of services likely to be accessed by children that are either large or at medium or high risk of any kind of illegal harm.

Measure number	Name of the measure	Smaller service			Large service		
		Low-risk	Single-risk	Multi-risk	Low-risk	Single-risk	Multi-risk
ICU D14	Dedicated reporting channel for trusted flaggers to report fraud					Applies to some[6]	Applies to some[6]
Recommender systems							
ICU E1	Collection of safety metrics during on-platform testing of content recommender systems			Applies to some[7]			Applies to some[7]
Settings, functionalities and user support							
ICU F1	Safety defaults for child users		Applies to some[8]	Applies to some[8]		Applies to some[8]	Applies to some[8]
ICU F2	Support for child users		Applies to some[8]	Applies to some[8]		Applies to some[8]	Applies to some[8]
Terms of service							
ICU G1	Terms of service: substance (all services)	Applies	Applies	Applies	Applies	Applies	Applies
ICU G2	Terms of service: substance (Category 1 services)	Applies to providers of Category 1 services					
ICU G3	Terms of service: clarity and accessibility	Applies	Applies	Applies	Applies	Applies	Applies
User access							
ICU H1	Removing accounts of proscribed organisations	Applies	Applies	Applies	Applies	Applies	Applies
User controls							
ICU J1	User blocking and muting					Applies to some[9]	Applies to some[9]

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[6] Applies to providers of large services that are at medium or high risk of fraud.

[7] Applies to providers of services that conduct on-platform testing of recommender systems and are at medium or high risk of two or more specified kinds of illegal harm.

[8] Applies to providers of all services that are at high risk of grooming, or large services at medium risk of grooming, and in each case, have an existing means of determining the age or age range of a particular user and have the relevant specified functionalities on the service.

[9] Applies to providers of large services that are (a) at medium or high risk of one or more of the following kinds of illegal harm: grooming; encouraging or assisting suicide (or attempted suicide); hate; harassment, stalking, threats and abuse; controlling or coercive behaviour, (b) have user profiles and (c) have at least one of the following functionalities: user connection functionality; posting content functionality; user communication (including but not limited to: (1) direct messaging functionality; and (2) commenting on content).

Measure number	Name of the measure	Smaller service			Large service		
		Low-risk	Single-risk	Multi-risk	Low-risk	Single-risk	Multi-risk
ICU J2	Disabling comments					Applies to some[10]	Applies to some[10]
ICU J3	Notable user and monetised labelling schemes					Applies to some[11]	Applies to some[11]

1.9 Table 2 shows the measures for search services. As for Table 1, where this says 'Applies' it is recommended for all the providers in a given group of services. Whether some of the measures apply depends on whether the service is a *general* search service or another kind of search service, such as *vertical* search service. Where we specify 'general search' in Table 2, this means the measures only applies to general search services for the relevant column and not vertical search services.

Table 2: Measures for search services

Measure number	Name of the measure	Smaller service			Large service		
		Low risk	Single risk	Multi-risk	Low risk	Single risk	Multi-risk
Governance and accountability							
ICS A1	Annual review of risk management activities				General search	General search	General search
ICS A2	Individual accountable for illegal content safety duties and reporting and complaints duties	Applies	Applies	Applies	Applies	Applies	Applies
ICS A3	Written statements of responsibilities			Applies	General search	General search	Applies
ICS A4	Internal monitoring and assurance						Applies
ICS A5	Tracking evidence of new and increasing illegal harm			Applies	General search	General search	Applies
ICS A6	Code of conduct regarding protection of users from illegal harm			Applies	General search	General search	Applies
ICS A7	Compliance training			Applies	General search	General search	Applies

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[10] Applies to providers of large services that (a) are at medium or high risk of one or more of the following kinds of illegal harm: grooming; encouraging or assisting suicide (or attempted suicide); hate; and harassment, stalking, threats and abuse and (b) enable users to comment on content.

[11] Applies to providers of large services that are at medium or high risk of fraud or foreign interference, and on which user profiles are labelled under a notable user scheme or a monetised scheme.

Measure number	Name of the measure	Smaller service			Large service		
		Low risk	Single risk	Multi-risk	Low risk	Single risk	Multi-risk
Search moderation							
ICS C1	Having a search moderation function designed to action illegal content	Applies	Applies	Applies	Applies	Applies	Applies
ICS C2	Setting internal content policies			Applies	General search	General search	Applies
ICS C3	Performance targets (for its search moderation function)			Applies	General search	General search	Applies
ICS C4	Prioritisation (of search content for review)			Applies	General search	General search	Applies
ICS C5	Resourcing (of search moderation function)			Applies	General search	General search	Applies
ICS C6	Provision of training and materials to individuals working in search moderation (non-volunteers)			Applies	General search	General search	Applies
Automated search moderation							
ICS C7	Removing listed CSAM URLs from search results	General search	General search	General search	General search	General search	General search
Reporting and complaints							
ICS D1	Enabling complaints	Applies	Applies	Applies	Applies	Applies	Applies
ICS D2	Having an easy to find, easy to access, and easy to use complaints system	Applies	Applies	Applies	Applies	Applies	Applies
ICS D3	Appropriate action - sending indicative timelines		Applies	Applies	General search	Applies	Applies
ICS D4	Appropriate action - sending further information about how the complaint will be handled		Applies to some[12]	Applies to some[12]	Applies to some[12]	Applies to some[12]	Applies to some[12]
ICS D5	Opt out from communications following a complaint		Applies	Applies	General search	Applies	Applies

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[12] Applies to providers of large general search services that are likely to be accessed by children or search services at medium or high risk of any kind of illegal harm that are likely to be accessed by children.

Measure number	Name of the measure	Smaller service			Large service		
		Low risk	Single risk	Multi-risk	Low risk	Single risk	Multi-risk
ICS D6	Appropriate action for relevant complaints about suspected illegal content	Applies	Applies	Applies	Applies	Applies	Applies
ICS D7	Appropriate action for relevant complaints which are appeals - determination (large general or multi-risk services)			Applies	General search	General search	Applies
ICS D8	Appropriate action for relevant complaints which are appeals - determination (services that are neither large general nor multi-risk)	Applies	Applies		Not general search	Not general search	
ICS D9	Appropriate action for relevant complaints which are appeals – action following determination	Applies	Applies	Applies	Applies	Applies	Applies
ICS D10	Appropriate action for relevant complaints about proactive technology, which are not appeals	Applies	Applies	Applies	Applies	Applies	Applies
ICS D11	Appropriate action for all other relevant complaints	Applies	Applies	Applies	Applies	Applies	Applies
ICS D12	Exception: manifestly unfounded complaints	Applies	Applies	Applies	Applies	Applies	Applies
ICS D13	Dedicated reporting channel for trusted flaggers to report fraud					Applies to some general search[13]	Applies to some general search[13]
Settings, functionalities and user support							
ICS F1	Reporting and removal of predictive search suggestions				Applies to some general search[14]	Applies to some general search[14]	Applies to some general search[14]
ICS F2	Provision of CSAM content warnings				General search	General search	General search

[13] Applies to providers of large general search services that are at medium or high risk of fraud.
[14] Applies to providers of large general search services that use a predictive search functionality.

Measure number	Name of the measure	Smaller service			Large service		
		Low risk	Single risk	Multi-risk	Low risk	Single risk	Multi-risk
ICS F3	Provision of suicide crisis prevention information				General search	General search	General search
Publicly available statements							
ICS G1	Publicly available statements: substance (all services)	Applies	Applies	Applies	Applies	Applies	Applies
ICS G2	Publicly available statements: substance (Category 2A services)	Applies to Category 2A services					
ICS G3	Publicly available statements: clarity and accessibility	Applies	Applies	Applies	Applies	Applies	Applies

Guidance for risk assessment duties

1.10 The table below sets out the areas covered by our guidance on the risk assessment duties. Unless specified, each row represents a duty which all U2U and search services are required to comply with, regardless of size or risk.

Table 3: Guidance for risk assessment duties for all services

No.	Ref.	Areas covered by the guidance
1	Risk Assessment Guidance and Risk Profiles	Duty to carry out a suitable and sufficient risk assessment.
2	Risk Assessment Guidance and Risk Profiles	Duty to take appropriate steps to keep a risk assessment up to date, including when Ofcom makes a significant change to a Risk Profile that relates to a service.
3	Risk Assessment Guidance and Risk Profiles	Duty to carry out a further suitable and sufficient risk assessment before making any significant change to any aspect of a service's design or operation.
4	Risk Assessment Guidance and Risk Profiles	Categorised services have a duty to publish a summary of their most recent illegal content risk assessment in their terms of service (Category 1) or in a publicly available statement (Category 2A).
5	Risk Assessment Guidance and Risk Profiles	We have included as guidance that service providers keep a written policy on keeping a risk assessment up to date.
6	Risk Assessment Guidance and Risk Profiles	We have included as guidance that services providers report on the illegal content risk assessment and measures through appropriate Governance and Accountability channels.

No.	Ref.	Areas covered by the guidance
7	Risk Assessment Guidance and Risk Profiles	We have included as guidance that, as a minimum, service providers should review their risk assessments annually.

Guidance for record–keeping and review duties

1.11 The table below sets out the areas covered by our guidance on the record-keeping and review duties. Unless specified, each row represents a duty which all U2U and search services are required to comply with, regardless of size or risk.

Table 4: Guidance for record-keeping and review duties for all services

No.	Ref.	Areas covered by the guidance
1	Record-Keeping and Review Guidance and Risk Assessment Guidance and Risk Profiles	Duty to make and keep a written record, in an easily understandable form, of all aspects of every illegal content risk assessment, including details about how the assessment was carried out and its findings.
2	Record-Keeping and Review Guidance	Duty to make and keep a written record of any Code of Practice measures taken or in use to comply with a relevant duty.
3	Record-Keeping and Review Guidance	Duty to make and keep a written record of any alternative measures taken or in use to comply with a relevant duty.
4	Record-Keeping and Review Guidance	Duty to review compliance with the relevant duties regularly and as soon as reasonably practicable after making any significant change to any aspect of the design or operation of the service.
5	Record-Keeping and Review Guidance and Risk Assessment Guidance and Risk Profiles	Category 1 U2U service providers and Category 2A search service providers have a duty to provide the written record of their risk assessment, or revision to it, to Ofcom, as soon as reasonably practicable after making or revising the record.
6	Record-Keeping and Review Guidance	We have included as guidance that the records providers must make and keep should be durable, accessible, easy to understand, and up to date.
7	Record-Keeping and Review Guidance	We have included as guidance that, where reasonably practicable, records should be kept in English (or for providers based in Wales, in English or Welsh). If this is not reasonably practicable, it should be possible for an English translation of records to be provided.
8	Record-Keeping and Review Guidance	We have included as guidance that records should be updated to capture any changes to a risk assessment, Code measure, or alternative measure.
9	Record-Keeping and Review Guidance	We have included as guidance that, as a minimum, service providers should conduct a compliance review at least once a year.