

# Children's Risk Assessment Guidance

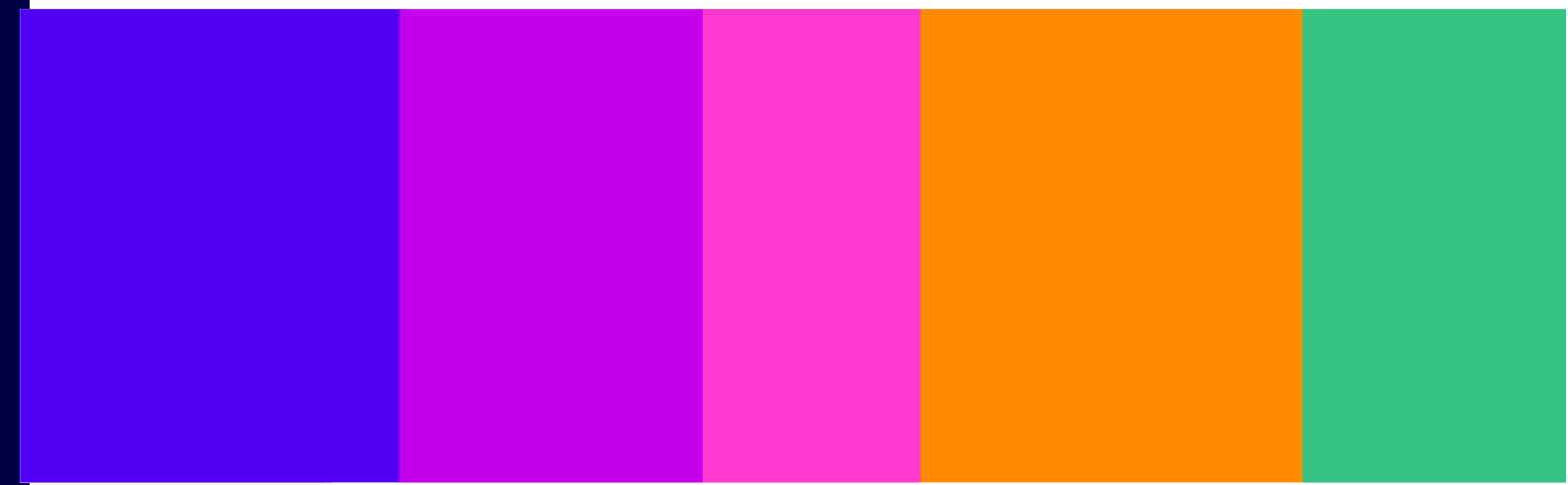
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Draft guidance for consultation

## Consultation

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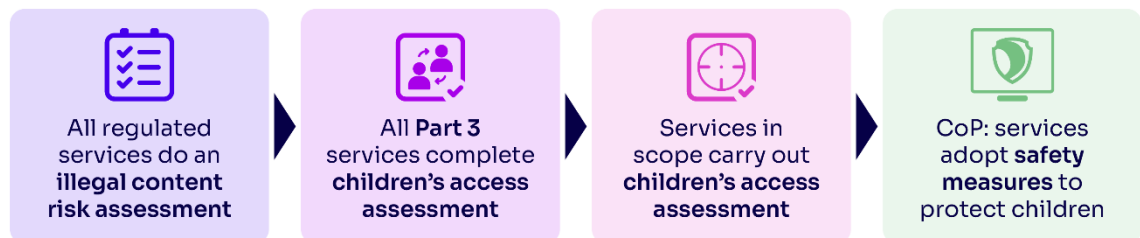
# **Part 1: Duties and carrying out a risk assessment**

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# 1. Introduction

- 1.1 This guidance aims to help services regulated by the Online Safety Act 2023 ('the Act') comply with the children's risk assessment duties.<sup>1</sup> The purpose of the children's risk assessment is to improve your understanding of the risk of harm to children on your service and what safety measures you need to put in place to protect them. If your service, or part of your service, is likely to be accessed by children, then you must complete a children's risk assessment to meet your duties under the Act.
- 1.2 Ofcom has an obligation to produce guidance to help service providers carry out a suitable and sufficient children's risk assessment. This guidance follows the same four-step process as in the proposed Service Risk Assessment Guidance for Illegal Harms. However, it has been adapted to reflect the risk assessment duties for **risk of harm to children presented by content harmful to children (CHC)** and the **design and use of their service**.
- 1.3 All Part 3 services must complete a children's access assessment. Your children's access assessment will help you work out if your service, or part of your service, is likely to be accessed by children. You can find our guidance about children's access assessments in Annex 5 of this consultation.
- 1.4 All services likely to be accessed by children must complete a children's risk assessment. This assessment is separate, and additional, to the illegal content risk assessment required for all Part 3 services. The purpose of children's risk assessments is to assess the risk as it currently exists to children on the service. **Children's risk assessments take into account any measures that services already have in place to protect children – this means some services will be thinking about this for the first time while others will already have some existing measures to protect children to consider.** Figure 1 below shows how the various risk assessment and safety duties fit together.

**Figure 1: Service providers in scope of the children's risk assessment duty**



- 1.5 Please see further resources and tools on the [Ofcom website](#) to help you understand and meet your obligations under the Online Safety Act.

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<sup>1</sup> Section 11(6) for user-to-user services and Section 28(5) for search services in the Online Safety Act 2023

## 2. Risk Assessment Duties

- 2.1 This section of the Guidance explains the children’s risk assessment duties.

### What are the children’s risk assessment duties?

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- 2.2 Carrying out a children’s risk assessment is a legal obligation for user-to-user (U2U) services and search services regulated by the Act that are likely to be accessed by children. To establish whether a service, or part of a service, is likely to be accessed by children, service providers must first complete a children’s access assessment.
- 2.3 U2U and search services likely to be accessed by children must assess the risk of harm they pose to children by the kinds of CHC set out in the Act and how the design of the service affects the level of risk of harm to children.
- 2.4 The Act sets out the specific elements that a children’s risk assessment needs to include. You need to take into account your service’s characteristics – such as user base and functionalities – and consider how they affect the likelihood and impact of harm to children. You must consider the likelihood and impact of children encountering **each kind of content harmful to children** on your service.
- 2.5 Alongside this guidance, we have published detailed research and analysis in our Causes and Impacts of Harm to Children Online which includes our draft Children’s Register of Risks and draft Guidance on Content Harmful to Children which you can consult.

### What is a “suitable and sufficient” risk assessment?

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- 2.6 Your children’s risk assessment must be **suitable and sufficient**. The risk assessment should be specific to your service and **reflect the risks accurately** as they exist at the time of your assessment cycle. The purpose of an accurate understanding of your risks is to **implement appropriate safety measures** to mitigate those risks and protect children on your service.
- 2.7 How you carry out the children’s risk assessment will depend on the size and nature of your service, but it must meet **all** of the elements specified in the children’s risk assessment duties (section 11(6) for U2U services and 28(5) for search services).
- 2.8 Your assessment must:<sup>2</sup>
- a) Separately assess the risk of children encountering **each kind of harmful content** listed in the Act (see Table 3.1 below);
  - b) Take into account **Ofcom’s Children’s Risk Profiles** which set out relevant risk factors for online services (Annex 1 of this Section);
  - c) Take into account the **characteristics** of your service, including its user base (e.g. user numbers, user base demographics), functionalities, algorithmic systems (and how easily, quickly and widely they disseminate content) and the business model;

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<sup>2</sup> See Annex 13 of this consultation for the full list of duties in the Online Safety Act.

- d) Take into account any other relevant aspects of your service’s **design and operation**, including governance, use of proactive technology, measures to promote users’ media literacy and safe use of the service, and other systems and processes;
  - e) Take into account **how the service is used** – for example, both the intended and unintended ways that people may use the service.
- 2.9 Considering all of this information, you should assign a level of risk of harm to children (Low/Medium/High), for each kind of content harmful to children. This will require assessment of the likelihood of each kind of harmful content being encountered by children and the impact of that content on children (its nature, severity and reach to children).
- 2.10 This guidance provides more detail on how you should go about evaluating these factors and make a judgement about the risk to children on your service.
- 2.11 **Your judgements on risk should be based on relevant information and evidence**, so that they accurately reflect the risk of harm to children on your service. What is suitable and sufficient will vary by the size and nature of the service, so different service providers will need to consider different levels and types of evidence and analysis. Our guidance covers:
- a) The **core evidence** that all service providers should consider, including relevant parts of Ofcom’s Children’s Register of Risks and Guidance on Content Harmful to Children, user reports and complaints, any relevant findings from your children’s access assessment, findings of your illegal content risk assessment, content moderation systems, relevant user data, and any other relevant information the service already holds.
  - b) The **enhanced evidence** that large service providers and those operating in a more complex risk environment should consider. These service providers should take a step-by-step process to assembling their evidence base, which may include the results of product testing, content moderation, consultation with technical experts, consultation with users or user research, views of independent experts, independent research, engaging representative groups, and/or external audit or other risk assurance processes.
  - c) Guidance **to support service providers to decide** which kinds of evidence they should collect and assess.
- 2.12 You need to keep a record of each children’s risk assessment you carry out, including details of how the assessment was carried out and its findings. We have provided [Guidance on Record Keeping and Review](#) to help providers understand what is expected of them and what to record, we provide further information at Part 2, Section 3 in this document.
- 2.13 Category 1 and 2A services have additional duties relating to their risk assessment findings:
- a) To publish a summary of their risk assessments in their Terms of Service (Category 1) or in a publicly available statement (Category 2A); and
  - b) To provide Ofcom with a copy of their risk assessment record as soon as is reasonable practicable.
- 2.14 To help service providers meet all of these requirements, our guidance sets out a four-step risk assessment process. Following this process will help you comply with the children’s risk assessment duties and the linked children’s safety duties and record keeping duties.

## What happens if you do not complete a suitable and sufficient children's risk assessment?

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- 2.15 If we suspect your service has failed to carry out a suitable and sufficient children's risk assessment properly or one at all, then we are able to take enforcement action. Any decision on whether to take enforcement action would be made in line with our draft online safety enforcement guidance.<sup>3</sup>
- 2.16 If we find that your service has contravened its obligations, we can impose a penalty of up to 10% of qualifying worldwide revenue or £18 million (whichever is the greater) and require remedial action to be taken.
- 2.17 As part of any remedial action, where we identify a risk of serious harm which your service is not effectively mitigating or managing, we can require that you comply with parts of the children's safety duties that require your service to mitigate and manage the risk of harm to children as if that harm had been identified in the relevant risk assessment.

## When do you need to do a first risk assessment to meet the obligations in the Act?

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- 2.18 If your service is in operation when this guidance is published, you need to complete your first risk assessment **within three months** of this date. [NOTE: this draft has been published for consultation; the three-month period begins when Ofcom publishes the final version of this guidance]
- 2.19 If you start a new service, or change an existing service so it falls within scope of the Act for the first time, you must complete your first risk assessment within three months from starting your new service, or making the change to your existing service. If you have more than one service in scope of the Act, you need to do a risk assessment for each service separately.
- 2.20 There are also several duties about reviewing, updating or completing new children's risk assessments. In summary:
- a) You must take **appropriate steps** to keep your risk assessment up to date;
  - b) You must update your risk assessment if Ofcom makes a significant **change to a Children's Risk Profile** that relates to your service; and
  - c) You must carry out a further risk assessment **before making a significant change** to any aspect of your service's design or operation.
- 2.21 See also see Part 2, Section 6 within this document for further details.

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<sup>3</sup> Refer to the [Draft enforcement guidance](#) in our Illegal Harms Consultation.

## What risks do you need to assess?

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- 2.0 Service providers need to assess the risks of harm to children on their service. ‘Harm’ is defined in the Act as physical or psychological harm. This includes circumstances where, as a result of the content, individuals act in a way that results in harm to themselves or that increases the likelihood of harm to themselves, and circumstances where as a result of the content, individuals do or say something to another individual that results in harm to that other individual or that increases the likelihood of such harm.<sup>4</sup>
- 2.1 Your assessment of risk of harm needs to:
- a) Separately assess the risk of children encountering **each kind** of content harmful to children set out in the Act. Content harmful to children includes each kind of content included in the categories of primary priority content (PPC), priority content (PC), as well as non-designated content (NDC); and
  - b) Assess the level of risk of harm to children presented by different kinds of content that is harmful to children.
  - c) You can assess the risk of each kind of content harmful to children by evaluating the likelihood of a given child encountering the content, i.e. how likely it is that a given child encounters that content on the service. You should also take into account the effectiveness of existing safety measures, and the impact that content could have on children in general, and on children likely to be disproportionately adversely affected in virtue of their age, characteristics or belonging to a particular group. To do this, you should consider:
    - i) The severity of the potential harm, i.e. how the content’s nature and the way in which users encounter it on the service could impact children who are users of the service, and/or how the nature of the harm indirectly suffered by children who are not users of the service could impact them; and
    - ii) The reach of the potential harm, i.e. the number of children that can be potentially impacted by that content on the service.
- 2.2 The Act specifies other dimensions to understanding harm. Harm presented by content can arise from any one or combination of the nature of the content, the fact of its dissemination or the manner of its dissemination.
- 2.3 Harm can also occur from isolated incidents of exposure or from cumulative exposure.<sup>5</sup> Cumulative harm arises in the following circumstances:
- a) when harmful content of the same kind (PPC, PC or NDC) is repeatedly encountered by a child;
  - b) or where a child encounters harmful combinations of content. These combinations of content include encountering different types of harmful content (PPC, PC or NDC), or a type of harmful content (PPC, PC, or NDC) alongside a kind of content that increases the risk of harm from PPC, PC or NDC.

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<sup>4</sup> Section 234 of the [Online Safety Act](#).

<sup>5</sup> Section 234 (4) of the [Online Safety Act](#)



- 2.4 Harm also includes indirect harm, in which children are harmed or the likelihood of harm is increased, as a result of another individual who views the content (by them doing or saying something to that other child as a result of viewing the content)
- 2.5 Children’s Risk Profiles will help you identify certain risk factors relevant to different kinds of content harmful to children which may occur on your service.
- 2.6 Your risk assessment should also factor in the risk to children posed by features and functionalities on your service, which may facilitate children to encounter particular kinds of content, including risks arising from multiple functionalities which, used in combination may increase the likelihood of harm arising or give rise to cumulative harm.
- 2.7 In carrying out their risk assessment, service providers should also consider how the design of their services and the different ways in which the service is used affects the level of risk of harm that may be suffered by children on their service. This includes the identification and assessment of functionalities that present a higher level of risk. For **user-to-user services**, this includes functionalities enabling adults to search for and to contact other users, including children, through the service;<sup>6</sup> for **search services** this includes a functionality that makes suggestions relating to users’ search requests (predictive search functionality).<sup>7</sup>

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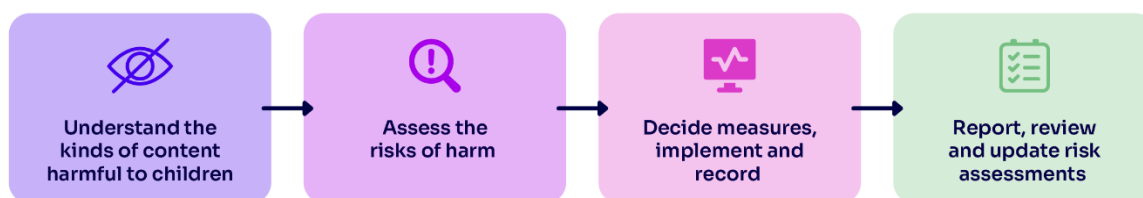
<sup>6</sup> As set out in Section 11(6)e (i) and (ii) of the [Online Safety Act](#).

<sup>7</sup> As set out in Section 28 (5) (c) of the [Online Safety Act](#).

# 3. How to carry out a children’s risk assessment: four-step methodology

- 3.1 This section of the Guidance explains the proposed four-step methodology to carry out a children’s risk assessment, based on best practice in risk assessments.
- 3.2 The steps for completing a children’s risk assessment are consistent with those set out in the Service Risk Assessment Guidance for Illegal Harms.<sup>8</sup> However, each piece of guidance takes into account specific duties which relate to each assessment. If you are required to carry out children’s risk assessments, it is therefore important to read both pieces of guidance. Subject to complying with the duties about the timing for each risk assessment, and the rules about updating and carrying out further risk assessments, service providers may choose to conduct the risk assessments separately for their services or as part of a single process, but you must keep separate records for each assessment.
- 3.3 The way you fulfil these steps will vary based on the size and nature of your service. We expect the outcomes of risk assessments to differ from service to service. However, following the four steps we set out is likely to be the most effective way of ensuring that your assessments are suitable and sufficient.
- 3.4 To confirm that your assessment meets this standard, you should check that your assessment meets all the elements of the children’s risk assessment duties (section 11(6) of the Act for U2U services and section 28(5) of the Act for search services for search services), and that it reflects the level of risk of harm to children who are users of the service accurately.
- 3.5 Figure 2 below shows how the four steps fit together.

Figure 3.1: the four-step process



## Fulfilling your children’s risk assessment requirements

- 3.6 While we propose a four-step risk assessment process service providers can adopt their own risk assessment methodology, as long as they comply with their risk assessment duties. However, if you choose to adopt an alternative risk assessment methodology to the one proposed in this guidance, you should ensure that it lets you ascertain your

<sup>8</sup> As set out in our Illegal Harms Consultation, [Annex 5](#)

service's risk level for each relevant kind of content that is harmful to children. Doing so would support you in implementing the measures in the draft Children's Safety Codes (if you choose to do so), since some measures in Ofcom's draft Children's Safety Codes are linked to the outcome of your children's risk assessment and whether or not your service is low, medium or high risk for relevant types of content harmful to children.

- 3.7 To help you carry out your children's risk assessment, Ofcom is required to produce Children's Risk Profiles. Children's Risk Profiles are a tool which sets out the risk factors (e.g. features and functionalities) that are most strongly linked to one or more kinds of PPC and PC. You should use the Children's Risk Profiles to identify and record the relevant risk factors for your service. You must take the Children's Risk Profile relevant to your service into account when you carry out your children's risk assessment.<sup>9</sup>
- 3.8 The next section of this document summarises each of the four steps in our guidance for conducting a children's risk assessment, including the key activities and outcomes from each step.

## Step 1. Understand the kinds of content harmful to children you need to assess

### Key Activities of Step 1

- **Identifying the kinds of content that need to be assessed**, including any NDC already identified by Ofcom in the Register of Risks and any other kinds you may have identified on your service;<sup>10</sup>
- **Consulting Ofcom's Children's Risk Profiles**

### Outcomes and requirements

- You have familiarised yourself with each kind of content harmful to children that needs to be assessed as part of a children's risk assessment;
- You have understood the need to assess the risk of children encountering each kind of content harmful to children on your service and to consider this risk for children in different age groups;
- You have consulted Ofcom's Children's Risk Profiles, and identified the risk factors your service has for each kind of content harmful to children.

### What you should have recorded

- Confirmation that your service has consulted Ofcom's Children's Risk Profiles. You may do this by recording the outcomes of the Children's Risk Profiles questionnaire (explained below);

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<sup>9</sup> See section 11(6) and section 28(5) of the Act which explains that services must take into account the risk profile that relates to the relevant kind of service in carrying out their children's risk assessment.

<sup>10</sup> Refer to The causes and impacts of harm to children online (Volume 2) for more information

- Any risk factors from Ofcom’s Children’s Risk Profiles which are relevant to your service.

### Supporting resources

- Children’s Risk Profiles (Appendix A1)
- Children’s Register of Risks
- Guidance on Content Harmful to Children
- Illegal Content Judgements Guidance
- Register of Risk for Illegal Content
- Glossary for Volume 3

3.9 Service providers need to separately assess the risk of children encountering content that is harmful to children as specified in the Act on their service, which includes: PPC, PC and NDC (Table 3.1).

**Table 3.1. Kinds of content that is harmful to children listed in the Act**

Primary priority content
<ul style="list-style-type: none"> <li>• Pornographic content</li> <li>• Content which encourages, promotes, or provides instructions for suicide</li> <li>• Content which encourages, promotes, or provides instructions for an act of deliberate self-injury.</li> <li>• Content which encourages, promotes, or provides instructions for an eating disorder or behaviours associated with an eating disorder</li> </ul>
Priority content
<ul style="list-style-type: none"> <li>• Content which is abusive and which targets any of the following characteristics— (a) race, (b) religion, (c) sex, (d) sexual orientation, (e) disability, or (f) gender reassignment.</li> <li>• Content which incites hatred against people— (a) of a particular race, religion, sex, or sexual orientation, (b) who have a disability, or (c) who have the characteristic of gender reassignment.</li> <li>• Content which encourages, promotes, or provides instructions for an act of serious violence against a person.</li> <li>• Bullying content.</li> <li>• Content which— (a) depicts real or realistic serious violence against a person; (b) depicts the real or realistic serious injury of a person in graphic detail.</li> <li>• Content which— (a) depicts real or realistic serious violence against an animal; (b) depicts the real or realistic serious injury of an animal in graphic detail; (c) realistically depicts serious violence against a fictional creature or the serious injury of a fictional creature in graphic detail.</li> </ul>

- Content which encourages, promotes, or provides instructions for a challenge or stunt highly likely to result in serious injury to the person who does it or to someone else.
- Content which encourages a person to ingest, inject, inhale or in any other way self-administer— (a) a physically harmful substance; (b) a substance in such a quantity as to be physically harmful.

#### Non-designated content

- Content harmful to children that is not primary priority content or priority content, and is of a kind which presents material risk of significant harm to an appreciable number of children in the United Kingdom.
- There are some limits regarding what could be considered in this category of harmful content. Content is not to be regarded as non-designated content where the risk of harm flows from:
  - a) the content’s potential financial impact,
  - b) the safety or quality of goods featured in the content, or
  - c) the way in which a service featured in the content may be performed (for example, in the case of the performance of a service by a person not qualified to perform it).

3.10 Some chapters in the Children’s Register of Risk have grouped different kinds of content harmful to children, such as suicide and self-harm, while others concentrate on a particular kind of content that is harmful to children.<sup>11</sup> This helps our analysis bring out risks that are similar in nature across the kinds of content and where we have overlapping evidence. However, where we have grouped kinds of content, we sometimes refer to individual content types where appropriate, for example where the particular observation or evidence is relevant only to a specific kind of content.

3.11 The Children’s Risk Profiles have grouped these different kinds of content harmful to children in line with the Register. Regardless of how the evidence is presented in the Register and Risk Profiles, service providers have a duty to separately assess the risk of children encountering each kind of harmful content on their service.

## Step 2. Assess the risk of harm to children

### Key Activities of Step 2

- Assessing the **likelihood and impact** of children encountering each kind of content harmful to children
- Assigning a **risk level of high, medium or low for each kind of content** harmful to children, including by considering the risk of cumulative harm
- Assessing the **different ways in which the service is used**, including functionalities or other features of the service that affect how much children use the service , and the impact of such use on the level of risk of harm that might be

<sup>11</sup> Refer to Table 7.1 in the Children’s Register of Risk Introduction section in The causes and impacts of harm to children online (Section 7, Volume 3)

suffered by children (for example due to increasing the likelihood that children encounter harmful content or the severity of harm they may suffer as a result);

- Evaluating **existing control measures** or any additional interventions that may increase or decrease risks of content harmful to children on your service;
- Concluding assessment of all the risks relating to content harmful to children and the design of your service to mitigate in step 3.

### Outcomes and requirements

- You have assessed the level of risk of children who are users of the service encountering different kinds of content harmful to children identified in Step 1 by considering the likelihood and impact of each, taking into account the risk factors highlighted by Ofcom in the Children's Risk Profiles, and the risk of cumulative harm;
- You have considered whether there are any specific characteristics or functionalities that apply to your service that may increase the risks of harm to children, but which are not covered in Ofcom's Children's Risk Profiles;
- You have considered the extent to which the design of the service, in particular its functionalities, affects the level of risk of harm that might be suffered by children, identifying and assessing those functionalities that present higher levels of risk, including functionalities on U2U services that enable adults to search for other users of the service (including children), or enable adults to contact other users (including children) by means of the service; or those functionalities that present higher levels of risk on search services, including a functionality that makes suggestions relating to users' search requests (i.e. a predictive search functionality);
- If you have identified a kind of NDC that has not been previously identified by Ofcom, you have assessed it. To help you understand what may be considered to be NDC, you need to familiarise yourself with the methodology for classifying content as NDC in the Children's Register of Risk.
- You have given separate consideration to children in different age groups encountering risk of harm to children;
- You have assigned a risk level of high, medium, or low to each kind of content harmful to children present on your service, for example by using the Risk Level Table included in Part 2.

### What you should have recorded

- Where applicable, a list of any additional characteristics (including functionalities) you have considered alongside the risk factors identified in Ofcom's Children's Risk Profiles in Step 1;
- A list of the evidence that has informed the assessment of likelihood and impact of each kind of content harmful to children;

- A list of the evidence that has informed the assessment of the risk of harm to children associated to the design and use of the service;
- A list of evidence used to consider children in different age groups in relation to each kind of harmful content;
- The level of risk assigned to each kind of content harmful to children, and explanation of the decision, taking into account wider risks identified in your risk assessment.

### Supporting resources

- Children's Risk Profiles
- Children's Register of Risks and Harms Guidance
- Core and enhanced evidence inputs
- Evidence regarding age of users

## Step 3. Decide measures, implement and record

### Key Activities of Step 3

- Deciding on **the appropriate measures** to reduce risk of harm to children, as assessed in Step 2, by:
  - Checking if **existing control measures** address the risks of harm identified in step 2;
  - Considering **any additional measures** that may be appropriate, including by consulting Ofcom's Children's Safety Codes;
- Implementing all measures appropriately; and
- Recording the outcomes of the risk assessment

### Outcomes and requirements

At this stage you will have considered all risks and put in place control measures<sup>12</sup>:

- You have considered any existing control measures.
- You will have consulted Ofcom's Children's Safety Codes or considered alternative or existing measures to meet the safety duties protecting children;
- You have implemented and made a record of any measures, including why you think these measures address the risks identified;
- You have made a complete record of your risk assessment, as per Ofcom's guidance on record keeping.

### What you should have recorded

- Any measures from Ofcom's Children's Safety Codes that have been, or are planned to be, implemented, and any measures that are not in use;
- Any measures that are alternatives or additional to those set out in Ofcom's Children's Safety Codes, with an explanation how the measures meet the relevant duties;
- All matters covered in our guidance on Record Keeping and Review.

### Supporting resources

Children's Safety Codes

Guidance on Record Keeping and Review

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<sup>12</sup> Risk management practices refer to this stage as 'residual risks' (i.e. the risk that remains after first identifying all potential risks and putting in control measures to address them)



## Step 4. Report, review and update

### Key Activities of Step 4

- Reporting on the children's risk assessment and measures via relevant governance channels;
- Reporting any NDC you may identify to Ofcom;
- Monitoring the effectiveness of mitigation measures at reducing the risk of harm to children;
- Reviewing your children's risk assessment.

### Outcomes and requirements

- You have reported your children's risk assessment findings through appropriate governance channels;
- Category 1 and 2a services must supply Ofcom with a copy of their children's risk assessment record. Category 1 services must summarise the findings of their most recent children's risk assessment in their terms of service (including of the levels of risk; nature, severity and potential harm to children). Category 2a services must do this in a publicly available statement;
- You have notified Ofcom of any incidence of NDC identified through your children's risk assessment;
- You have arrangements in place to monitor the effectiveness of your safety measures;
- You have established an annual review cycle for your children's risk assessment;
- You have understood the triggers set out in the Act for when you should review or update your risk assessment or carry out a new one.

### What you should have recorded

- That a children's risk assessment has been reported through your appropriate governance channels;
- Any examples of NDC you have identified, and how you have reported this to Ofcom (including the incidence of such content);
- How your service keeps the risk assessment up to date (for example, as part of a written policy).

### Supporting resources

- Record keeping guidance;
- Further guidance on keeping a risk assessment up to date.

# **Part 2: Detailed considerations when carrying out a risk assessment**

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# 4. What to consider in the four steps

- 4.1 This section of the guidance elaborates on what to consider during the four steps of risk assessment in our proposed methodology.

## Step 1. Understand the kinds of content harmful to children you need to assess

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### Content harmful to children

- 4.2 Your children’s risk assessment must separately assess the risk of children encountering each kind of content that is harmful to children by means of your service. This means:
- a) Assessing the likelihood and impact of children encountering each kind of content harmful to children on your service; and
  - b) considering children in different age groups and those with certain vulnerabilities or characteristics which may impact the level of risk of harm.
- 4.3 These are set out in Table 3.1 and you can use the Children’s Register of Risks and the Guidance on Content Harmful to Children to help you understand more about the risks to children online.<sup>13</sup>

### Consult Ofcom’s Children’s Risk Profiles

- 4.4 Ofcom has created Children’s Risk Profiles for content harmful to children, and you must consult them when conducting your children’s risk assessment. They are not the same as the Risk Profiles for illegal harms.
- 4.5 There is a Children’s Risk Profile for U2U services, and a Children’s Risk Profile for Search services. Each Children’s Risk Profile identifies risk factors most strongly associated with children encountering particular kinds of CHC based on the evidence in the Register of Risks. These risk factors are a selection of service characteristics (such as user base, business models and functionalities) that the evidence indicates are strongly linked to a risk of harm for different kinds of CHC. We have grouped these into general risk factors, which all service providers should take account of, and specific risk factors, which are dependent on specific service characteristics.
- 4.6 These risk factors are a good starting point for thinking about which kinds of harmful content children could encounter on your service, and how. However, it is important to understand that the risk factors are not comprehensive and are context specific.
- 4.7 To consult the Children’s Risk Profiles, read the instructions in Appendix A. They explain how you can identify which risk factors apply to your service. We provide a set of questions to help you do this.

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<sup>13</sup> Refer to The causes and impacts of harm to children online section within this volume for more information.

## Record your risk factors

- 4.8 Record your risk factors by using the check boxes provided in the Children’s Risk Profiles in the section below. Each risk factor will be relevant to one or multiple kinds of harmful content to children, which the Children’s Risk Profile will tell you.
- 4.9 You should use these risk factors when assessing the likelihood and impact of children encountering each kind of CHC on your service in Step 2.

## Identifying Non-designated content (NDC)

- 4.10 NDC is set out in the Act as content “of a kind which presents a material risk of significant harm to an appreciable number of children in the United Kingdom.”<sup>14</sup> **All service providers completing a children’s risk assessment have a duty to assess the risk of children encountering NDC on their service.**
- 4.11 Assessment of NDC will look different on different services. However, we expect all service providers, at a minimum, to consider the framework in the Children’s Register of Risk as well as all of their core evidence inputs. Currently our evidence base does not allow Children’s Risk Profiles to present risk factors linked to NDC as they do with other kinds of CHC. However, a service may find it useful to consider the risk factors identified in Children’s Risk Profiles for other kinds of CHC when assessing themselves for NDC.
- 4.12 In the Children’s Register of Risks, Ofcom has set out its own assessment of the risks to children from NDC, including its framework for identifying kinds of non-designated content. In this framework, we explain that:
  - a) **‘significant harm’** means physical or psychological harm that causes lasting impact on children’s wellbeing, attitudes or behaviour, whether directly to users or indirectly to others;
  - b) **‘material risk’** relates to the likelihood of harm occurring, and this can be assessed by linking significant harm to a specific kind of content; and
  - c) **‘appreciable number’** does not necessarily have to be a very large number of children, but not one child or very few children.
- 4.13 Any categories of NDC which Ofcom has identified have been included in the Children's Register of Risk.
- 4.14 You should consider whether any of the categories of NDC identified by Ofcom may be a risk on your service. You may also identify risks of other kinds of non-designated content that Ofcom has not identified in the Children’s Register of Risks
- 4.15 Where you **provide a U2U service** and you **identify** that NDC is present on your service then you must notify Ofcom of:<sup>15</sup>
  - a) The kinds of content identified as NDC
  - b) the incidence of such NDC on the service
- 4.16 Even if you do not identify any kinds of NDC as posing a risk on your service, you must still record how you considered the risk of children encountering NDC. See Step 4 Record and Review for details on how to do this.

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<sup>14</sup> Section 60(2)(c), The Online safety Act 2023

<sup>15</sup> This includes kinds of NDC which Ofcom has identified in the Children’s Register of Risks and any other kinds of NDC which Ofcom has not identified.

## Relevance of the illegal content risk assessment

- 4.17 There may be overlaps between some categories of content harmful to children and some categories of illegal content. For example, content that promotes, encourages or provides instructions for suicide may, in addition to being PPC, also amount to priority illegal content (i.e. assisting suicide). Equally, some characteristics of the service that affect the level of risk of harm for children (e.g. user base, functionalities, ways in which a service is used) may have already been considered as part of the illegal harm risk assessment. For example, for priority offences such as grooming offences or CSEA offences.
- 4.18 Notwithstanding these possible overlaps, service providers have separate duties in respect of illegal harms and content harmful to children and have to carry out risk assessments in relation to both of these. See Annex 2 in this section for a comparison of the illegal content risk assessment duties and the children’s risk assessment duties. The findings of each risk assessment will each lead service providers to put in place different Codes measures to reduce the risk of each kind of content harmful to children or illegal content. If service providers identify illegal content that overlaps with content harmful to children, then the illegal content duties will apply.
- 4.19 Taking account of the analysis and evidence in your illegal content risk assessment may be relevant in different circumstances. For example, when assessing content harmful to children that may constitute illegal content, you may refer to your assessment of illegal harms; or your illegal content assessment may already have provided insights of the risk of specific functionalities that enable adults to search or contact children relating to illegal content that you may find relevant to the risks from content harmful to children.
- 4.20 In addition, other Ofcom resources may also be useful to understand the risk of harm from illegal content and from services being used for the commission or facilitation of certain priority offences, such as the Register of Risk for Illegal Content or the Illegal Content Judgements Guidance. Referring back to the analysis and evidence in your illegal content risk assessment can help you ensure there is consistency between the two risk assessments.
- 4.21 The Guidance on Content Harmful to Children also contains information to help you understand what could be considered content harmful to children, and the Illegal Content Judgements Guidance contains information to help you understand what could amount to illegal content.

## Step 2. Assess the risk of harm to children

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### What does assessing each risk involve?

- 4.22 You need to assess the level of risk presented by your service for each kind of content harmful to children. This means evaluating the likelihood and the impact of children encountering each kind of content harmful to children. To do this, you must consider all of the characteristics covered above and should use evidence about your service to make your assessment. You can then assign a risk level for each kind of harmful content: low, medium or high.

- 4.23 All service providers should consider the ways in which they are used, including functionalities on their service that affect how much children use the service. For example, whether certain functionalities could increase the likelihood of children’s exposure to certain kinds of harmful content, or the severity of the harm experienced as a result of this exposure.
- 4.24 In considering these specific functionalities, service providers will need to assess how they affect the risks associated with each of the kinds of content that is harmful to children on their service. Service providers may also assess that there are wider risks of physical or psychological harm associated with these specific functionalities on their service, for example if they have a reason to believe that any additional instances of physical or psychological harm are likely to arise as a result of such functionalities.
- 4.25 To assist with understanding content harmful to children and functionalities, including the ways functionalities and services’ design affect the level of harm, we have published relevant analysis. The Childrens Register of Risk presents evidence on how functionalities could lead to increased harm in respect of each kind of PPC, PC and NDC. It also presents evidence about how particular features and functionalities may affect how much children use the service. Some of the wider risks of harm are also discussed in the content of our Register of Risks for Illegal Harms.
- 4.26 Table 4.1 below sets out at a high level how you should assess the likelihood and impact of children encountering each kind of CHC, and what to take into account to make a judgment about the level of risk posed to children by each kind of content harmful to children.

## Cumulative harm

- 4.27 When service providers are considering whether children are at risk of harm on their service, you should also consider the risk of harm presented by content harmful to children arising in the form of cumulative harm where:
- a) content, or content of a particular kind, is **repeatedly encountered** by an individual (including, but not limited to, where content, or a kind of content, is sent to an individual by one user or by different users or encountered as a result of algorithms used by, or functionalities of, a service); or
  - b) content of a particular kind is **encountered by an individual in combination with content of a different kind** (including, but not limited to, where a kind of content is sent to an individual by one user or by different users or encountered as a result of algorithms used by, or functionalities of, a service).
- 4.28 Service providers should assess such cumulative risks where they relate to content harmful to children on their service. This can be on its own (e.g. cumulative exposure from one kind of PPC, PC or NDC), or in combination (e.g. cumulative exposure to several kinds of PPC, PC or NDC). In some circumstances, cumulative harm may be exacerbated where cumulative exposure to content harmful to children happens alongside exposure to content that would not amount to harmful content by itself, but is harmful in high volumes and in association with PPC, PC or NDC. For example, children may encounter content promoting suicide or self-harm alongside other content describing intense experiences of depression, or other mental health conditions. The combination of suicide and self-harm content with other ‘depressive’ content may exacerbate mental

conditions in children, especially if their feeds include high volumes of mental-health related content as a result.<sup>16</sup>

- 4.29 Service providers should also consider how functionalities affect the risk of cumulative harm to children on their service. For example, this could happen where a functionality will expose children to a kind of content harmful to children or a combination of content harmful to children repeatedly therefore amplifying the impact of harm presented by it. You should refer to Ofcom's Children's Risk Profiles to identify the functionalities that may increase the risk of children experiencing cumulative harm on your service. The Register of Risk and Guidance on Content Harmful to Children also include illustrative examples of the ways cumulative harm could be experienced by children online.<sup>17</sup>
- 4.30 As part of this assessment, you should also consider how any features or functionalities affect how much children use the service, as if they are spending more time on the service, it could increase the likelihood that a child may encounter content harmful to children. This includes, for example, the impact of such use on the risk of cumulative harm that may be suffered by children.

## Features which affect how much children use the service

- 4.31 Ofcom's Children's Register of Risk, Guidance on Content Harmful to Children and Children's Risk Profiles will help you identify features and functionalities which may impact how much children are using your service, and you should take this into account when considering the likelihood and impact of each kind of content harmful to children. You can also consider any other features and functionalities which have been identified in the Act.<sup>18</sup>

## Consider all relevant evidence

- 4.32 You should aim to understand risks as they exist at the time of your assessment cycle, taking into account also the effectiveness of any safety measures already in place; this may lead you to consider any inherent risks (including those relating to the effect of any measures already in place).
- 4.33 You should assign a level of risk (high, medium, or low) for the risk of children encountering each kind of content that is harmful to them. The risk level that you assign to each kind of content will be important when considering which safety measures you need to implement as part of Step 3.
- 4.34 To make the assignment of high, medium, or low, you should consider the likelihood of children encountering each kind of harmful content on your service, alongside the potential impact this kind of content could have on children. Where you have evidence or can access relevant evidence, you must also consider how children in different age groups or with certain characteristics may experience each kind of harm. For example, teenage girls may be more likely to encounter eating disorder content and they may be more impacted by this content than others.

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<sup>16</sup> The Bright Initiative and Molly Rose Foundation, 2023. [Preventable yet pervasive: The prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest](#)

<sup>17</sup> Refer to The causes and impacts of harm to children online (Volume 3) for more information.

<sup>18</sup> Section 233 of the Online Safety Act 2023.

- 4.35 To help you with this step, we have listed the sorts of evidence we recommend you consider when doing the assessment.
- 4.36 We have divided the evidence into core inputs which all service providers should consider, and enhanced inputs which some service providers should also consider in addition to core inputs. We expect large service providers or service providers which have identified several specific risk factors on their service for a type of harmful content using the Risk Profile will typically need to include some or many enhanced inputs to improve the accuracy of their judgements on risk. We set out further guidance on which service providers we think should consider enhanced inputs.
- 4.37 We expect that the core and enhanced inputs will provide you with a good understanding of how the characteristics of your service increase risk of harm to children presented by content harmful to children and the design of your service. See a summary of these inputs in the box below. However, the list is not exhaustive, and you should consider whether you need to take any additional steps to ensure your children’s risk assessment is suitable and sufficient.

**Table 4.1: Summary of core and enhanced inputs**

Type	Overview of inputs
<b>Core inputs</b> <i>All service providers should consider</i>	Risk factors identified through relevant Children’s Risk Profile in Step 1 User complaints and reports User data Any information used to consider the age of children on your service Retrospective analysis of incidents of harm Children’s Register of Risks and Harms Guidance Relevant findings of your Illegal Harms Risk Assessments Relevant findings of your Children’s Access Assessments Insights from content moderation systems - as a core input, we expect service providers to consider high level outputs, this would include the volume of CHC identified through a complaints-based content moderation system Other relevant information (including any other characteristics that apply to your service that may increase or decrease risks of harm)
<b>Enhanced inputs</b> <i>Additional to consider, particularly relevant for large service providers and those operating in a more complex risk environment</i>	Results of product testing More complex analysis obtained from content moderation systems - as an enhanced input, we expect service providers to consider more granular or in-depth analysis such as evidence which relates to the effectiveness of content moderation system Consultation with internal experts on risks and technical mitigations Results of previous interventions to reduce online safety risks Views of independent experts Internal and external commissioned research Outcomes of external audit or other risk assurance processes Consultation with users Results of engagement with relevant representative groups



## Consult Ofcom's Causes and Impacts of Harm to Children Online

- 4.38 Volume 3 contains our draft Children's Register of Risks and our draft Guidance for Content Harmful to Children. The Children's Register of Risks provides detailed evidence on risk factors that we have used to inform the Children's Risk Profiles, organised by kind of harmful content to children (some of these harms have been grouped due to relevance). Meanwhile, our Guidance on Content Harmful to Children sets out examples of the kinds of content may or may not fall in scope of PPC and PC categories of content.
- 4.39 Service providers may consult the Children's Register of Risks, to gain a better understanding of each kind of harmful content. For example, if you identify through Ofcom's Children's Risk Profiles that your service has risk factors which increase the risk of certain kinds of primary priority (PPC) or priority content (PC), you may choose to review the corresponding chapters in the Register to gain a better understanding of how these kinds of harmful content impact children and how this could apply to your service.
- 4.40 The Children's Register of Risks also includes evidence regarding developmental stages relating to age to help you consider age groups and relevant considerations to when assessing the risk of harm to children on their service.<sup>19</sup>
- 4.41 As well as setting out evidence regarding content harmful to children, the Children's Register of Risks also includes evidence about how cumulative harm can occur on a service and on how features and functionalities may impact the risk level to children who are users of a service.

## Consider children in different age groups

- 4.42 Service providers have a duty to assess their user base, including the number of children in different age groups on the service. Additionally, service providers must assess the impact of the risk of harm to children in different age groups on their service.
- 4.43 We expect service providers to have different levels of understanding, evidence and data about the age of users.
- 4.44 When considering the age of child users, we expect all service providers to use the best available information to ensure their assessment of risk is suitable and sufficient. When considering user data, you must also consider privacy rights and your duties under the UK GDPR. We encourage you to consult the ICO's guidance on UK GDPR requirements and the Age Appropriate Design Code.<sup>20</sup>
- 4.45 The kinds of information available will look different for different service providers but could include:
- a) Data from age assurance processes;
  - b) Information gathered by the service on the users' age in the process of opening up an account i.e. data from self-declaration;

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<sup>19</sup> Refer to Ofcom's Children's Risk Assessment in Volume 3 for more information.

<sup>20</sup> ICO, [UK GDPR guidance and resources](#); ICO [Age appropriate design: a code of practice for online services](#)

- c) Proxy indicators for age, such as behavioural patterns identified while a user is active on the service which gives a reasonable indication of age;
  - d) Consumer or other research conducted to inform product or advertising decisions, or to make the service attractive to children;
  - e) Whether your service is likely to attract users of a certain age or consider other data sources about children’s habits online;
  - f) Any other third-party research or research commissioned by you, to establish the age of the user base on your service or the age groups your service is likely to attract.
- 4.46 Minimum ages specified in terms of service (whether or not accompanied by confirmation by the user) should not normally be relied on as the evidence of the age of children on the service in and of themselves. Service providers should be mindful of underage users who may access their service despite specific age limits set out in their terms of service, unless they use a form of highly effective age assurance to enforce age limits.
- 4.47 We expect many service providers to be unable to distinguish users of different ages (including differentiating children from adults; or children within different age groups) to a high level of confidence. Where this is the case, we expect risk assessments to take a conservative view of the potential number and the age of children, erring on the side of caution when assessing the scope for children to be impacted by harmful content.
- 4.48 For example, if there is a high number of overall users on your service, we expect you to assume that you also have a high number of children, potentially in age groups that are particularly vulnerable to harm from the relevant kind of content, unless you have strong evidence to demonstrate otherwise. This is because children often engage with online services in the same way as adults, therefore it is reasonable to assume that children will be present on your service with a proportion at least similar to the one to they represent of the overall population. Children on your service could therefore be of any age group, including those that are at higher risk of encountering the relevant kind of content, as explained in the Children’s Register of Risks and Risk Profiles.
- 4.49 Relying only on self-declared age information would not be considered sufficient evidence for this purpose. We would expect service providers to assume that the true number of children using their service – both overall and within specific age groups – could be much greater than suggested by self-declared information (or similar forms not considered robust). As explained in the Risk Level Table (Table 4.2), this will therefore affect the risk level assessment as the higher the number of children, and greater number of children in vulnerable age groups, the greater the potential impact from encountering any kind of harmful content.
- 4.50 The Children’s Register of Risks and Children’s Risk Profiles include further guidance on the developmental stages of children in different age groups, in the context of content harmful to children, about age groups to help you consider the risk of harm to children in different ages.

## Consider any additional characteristics that may increase or decrease risks of harm

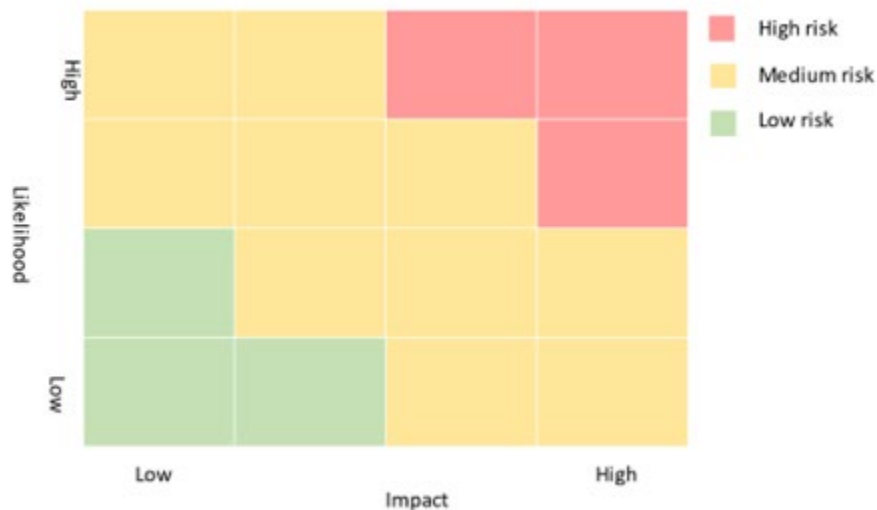
- 4.51 Using the information in Step 1 and your own evidence, you must now assess the risk of children encountering each kind of harmful content on your service. Your assessment must cover all the elements set out in sections 11(6) and 28(5) of the Act.
- 4.52 This means that when conducting your risk assessment, you should:
- 4.53 Consider if there are any additional characteristics that your service has which have the potential to increase risks of harm to children, but which may not be present in Ofcom's Children's Risk Profiles. This could include functionalities that relate to illegal harms that pose risks to children. For example:
- a) If you are a U2U service, a functionality which enables adults to search for or content other users of the service (including children) or features and functionalities which affect how much children use the service.
  - b) If you are a search service, a functionality that makes suggestions relating to users' search requests (predictive search functionality).
- 4.54 Consult your own evidence when considering all risk factors to complete your risk assessment. This is because the riskiness of an individual risk factor will be influenced by various other elements, including how a service's functionalities, user base, business model and systems and processes in combination can serve to increase or decrease risks of harm.

## Assign a risk level to each kind of content harmful to children – likelihood and impact evaluation

- 4.55 Considering the relevant evidence, you should use your judgement to assign a risk level of high, medium, low or negligible to each kind of content harmful to children.
- 4.56 When risk assessing NDC as part of your children's risk assessment you must risk assess each kind of NDC separately, and assign a risk level as you would any other kind of content harmful to children. You should consider whether any risk factors you have identified for other harms might help understand NDC, as often risk factors can be common across harms.
- 4.57 The risk level that you assign to each kind of content will be important when considering which safety measures you need to implement as part of Step 3.<sup>21</sup>
- 4.58 When it comes to assigning a risk level, you may find it convenient to use a risk matrix based on a likelihood and impact evaluation. A risk matrix will help you in assigning a risk level based on the evidence you have consulted on the likelihood and impact of harm.

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<sup>21</sup> Please note that certain measures listed in our Children's Safety Codes address kinds of PPC or PC specifically.



### Assessing the likelihood of content harmful to children

To evaluate the **likelihood** of harm, you should assess how likely it is that a given child using the service will encounter each kind of harmful content. In making this evaluation, you should also take into account the effectiveness and limitations of any existing safety measures on your service.

The risk factors that you identify from Ofcom’s Children’s Risk Profiles (see Annex 1) in Step 1 are an important starting point for identifying how children could encounter harmful content on your service. These will give a good indication of which kinds of harmful content are most likely to be encountered by children on your service, and which risk factors play a role in increasing that likelihood.

However, the risk factors do not provide a complete picture of likelihood. You should consider additional evidence, including:

- a) **Any other characteristics** of your service that may increase or decrease the risk of children being harmed.
- b) **Core and relevant enhanced inputs.** Consulting these inputs will provide you with information about how children may encounter harmful content on your service and its impact on them. You should also use these inputs to help you consider how children in different age groups may be impacted by different harmful content, alongside information Ofcom has set out in the Register about age groups and harm.
- c) **How the design of your service** may increase or reduce the likelihood of children encountering certain kinds of harmful content on your service. For instance, any content moderation systems you may already have in place or content recommendation features that may lead children to harmful content or amplify the frequency or volume with which children encounter harmful content.
- d) **How existing systems and processes** may increase or reduce the risks of harm identified. If your service has existing measures in place that aim to address CHC - such as content moderation systems or user reporting and complaints - this does not imply that the service has a low likelihood of children encountering CHC. You should consider the evidence you have to understand the impact and limitations of such existing measures, and how they work as part of the wider set of interventions designed to reduce the risk of harm to children.<sup>22</sup>

<sup>22</sup> Refer to the Governance and Accountability section within this volume for more information.

- e) **Any features or functionalities** which may impact how frequently children use the service or how much time they spend on them. For example, understanding the role of autoplay.<sup>23</sup>

For all service providers, we recommend that you consult the findings of your illegal risk assessment to understand if there are any additional risks relevant to child users on your service that you need to consider further.

The table below provides guiding questions about your evidence to help you reach a view on the likelihood of the risks you are considering.

**Table 4.2: What to consider when assessing likelihood**

What to consider when assessing likelihood
<p><b>Ofcom’s Children’s Risk Profiles</b></p> <ul style="list-style-type: none"> <li>• If your service is <b>U2U</b>, do your service’s <b>risk factors</b> identified in Step 1 indicate that this kind of harmful content is likely to be encountered by children on your service? If so, how many risk factors do you have that are associated with children encountering the kind of harm? We expect that the larger the number of risk factors for a given harm, the higher the likelihood of that harm.</li> <li>• If your service is a <b>search</b> service, then consider any <b>risk factors</b> alongside your assessment of each kind of CHC. While at present no links with specific kinds of content are noted, these risk factors will help you organize evidence for assessing the likelihood of each kind of CHC separately.</li> <li>• For <b>all service providers</b>, when considering the likelihood of NDC, take into account how any of your service’s different characteristics may increase the likelihood of a child encountering NDC. Not all kinds of NDC are likely to be associated to risk factors, however, you should consider any <b>risk factors</b> identified in Children’s Risk Profiles for any other kinds of harmful content may also increase the likelihood of NDC occurring.</li> </ul> <p><b>Ofcom’s Children’s Register and Harms Guidance</b></p> <ul style="list-style-type: none"> <li>• For all services, consider whether the Children’s Register of Risk indicates evidence that harm is likely to occur on your service.</li> </ul> <p><b>Other characteristics</b></p> <ul style="list-style-type: none"> <li>• For all service providers, are there any other <b>characteristics</b> that apply to your service (including functionalities, user-base, business model and governance, systems, and processes) that you have identified may make children more likely to encounter content harmful to children? For example:</li> <li>• Are <b>adults able to search for children or contact children</b> by means of your service?</li> <li>• Does your service use recommender algorithms or functionalities which allow users to share content widely?</li> </ul> <p><b>Frequency of use and amount of use</b></p>

<sup>23</sup> Refer to The causes and impacts of harm to children online (Volume 3) for more information.

- Do you have any features or functionalities which affect how much children use your service? (Examples of such features are set out in the Children’s Register of Risk and Children’s Risk Profiles)
- Do you have any evidence regarding the amount of time children typically spend on your service? For example, how likely they are to go back on the service in response to a push notification, etc? Children spending more time on the service may engage with more content and all else being equal could result in children encountering more harmful content.

### Cumulative Harm

Have you considered how children may experience encountering harm repeatedly on your service and whether this amounts to cumulative harm.

### Core and Enhanced evidence

- Is there any evidence that children are likely to encounter a kind of CHC on your service based on the information from your **core inputs**? You should consider:
  - Whether there is evidence of a kind of harmful content being encountered by children, including children with certain characteristics, based on user complaints and reports. For example, low level but regular reports could indicate a higher risk that the harm is likely to occur, equally significant volumes of reports in relation to a particular harm could indicate a specific issue which has made a harm more likely to be encountered by children on your service;
  - Whether there is any other relevant evidence and data which suggests there is a higher risk of the harmful content occurring on your service; and
  - Whether there is any evidence based on results of content moderation of the harmful content being encountered by children.
- If you have consulted core evidence inputs and are still unsure about the likelihood of children encountering this harm, then consider any additional evidence based on the information from **enhanced inputs**. You may consider:
  - Whether there is any evidence from independent experts or externally commissioned research that highlights the potential for harmful content to appear;
  - Whether there is evidence based on results of product testing of the potential for harm to appear;
- Are there systems or processes already in place that reduce the risk of children encountering the harmful content on your service? Can you demonstrate that these are effective in decreasing the risk of harm to children?

### Other relevant considerations

- Do you prohibit this kind of content on your service?<sup>24</sup>
- Do you implement highly effective age to prevent/protect children from encountering this content?

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<sup>24</sup> For the avoidance of doubt, prohibiting this a kind of content by itself should not be considered sufficient to result in low likelihood of the kind of content being encountered. This would depend on other factors including the effectiveness of systems and processes that identify and remove violative content.

- Do you have measures to promote users' **media literacy** and safe use of the service? It is possible that such measures could reduce the likelihood of content being encountered.

## Assessing the impact of content harmful to children

- 4.59 To evaluate the **impact** of harm, you should assess:
- a) The **severity** of the potential harm caused to children, i.e. how the content's nature and the way in which users encounter it on the service (for instance repeatedly, due to functionalities on the service amplifying harmful content) could impact children who are users of the service, and/or how the nature of the harm indirectly suffered by children who are not users of the service could impact them; and
  - b) The potential **reach** of each kind of content on your service, i.e. the number of children that could potentially be impacted.
- 4.60 In making your evaluation, you should consider children in general, as well as giving consideration to children likely to be disproportionately adversely affected by content by virtue of their age group, characteristics or belonging to a particular group (e.g. children belonging to vulnerable groups such as, for example, those with existing mental health challenges).
- 4.61 For the avoidance of doubt, where evidence shows potential for severe harm in relation to a kind of content, we expect that this may lead to an assessment of moderate or high impact, even if the number of children potentially impacted is relatively small and even if this number is smaller than the indicative values provided in the Risk Level Table (Table 4.3 below).
- 4.62 Evaluating impact will be much more dependent on understanding the **evidence about your own service**. The key aspects of this judgement will be:
- a) The potential reach of CHC measured by numbers of children who could be affected and how content is shared and disseminated;
  - b) Whether your service is likely to attract a high number or proportion of children because it targets children or is otherwise attractive to children due to certain features or kinds of content;
  - c) How children in different age groups or in vulnerable groups could be affected by harm;
  - d) How children experience different harms on your service; and
  - e) How CHC may impact third parties beyond your service (this is particularly relevant for certain kinds of CHC, for instance bullying content).
- 4.63 You should consider:
- a) The risk factors you identified in Step 1. Information regarding business models, recommender systems and user base demographics may help you understand how different child groups are impacted by the kind of PPC or PC. For example, girls are disproportionately impacted by harm caused by certain kinds of content, such as eating disorder content. You can also consult the relevant sections of the Children's Register to gain a fuller understanding of how different users are impacted by harms.
  - b) Any other characteristics of your service that may increase or decrease the impact of harmful content.
  - c) Core inputs any and relevant enhanced inputs. Consulting these inputs will provide you with information about how the kinds of CHC is experienced on your service

specifically. The kinds of evidence you may use to assess the risk of harm to children on your service is set out in section 5 of this guidance.

- 4.64 The table below provides guiding questions on what to consider when consulting your evidence.

**Table 4.3: What to consider when assessing impact**

What to consider when assessing impact
<p><b>Reach</b></p> <ul style="list-style-type: none"><li>• What is the potential reach of content harmful to children on your service? Consider:<ul style="list-style-type: none"><li>○ User base - the number or proportion of children on your service, either confirmed or estimated with your best available information. Typically, we would expect that the larger the number of users, the greater the potential for children to be on a service, and therefore the greater the potential impact of any given harm. Also, the greater the number of children on your service, the greater the potential reach of any given harm.</li><li>○ Functionalities relating to the ability to search for or share content - whether the way that content is shared and disseminated, including through recommender systems and other algorithmic systems, could increase the number of children encountering harmful content.</li><li>○ Business model - how does your service's business model and commercial profile influence the way children may experience harm on your service. Consider the information we provide in Children's Risk Profiles and your own evidence.</li></ul></li></ul>
<p><b>Children's Risk Profiles</b></p> <ul style="list-style-type: none"><li>• For all service providers, consider any <b>risk factors</b> identified in Ofcom's Children's Risk Profiles that could affect the reach and impact of content harmful to children on your service. For example, features and functionalities which may affect how widely content is disseminated or how vulnerable demographics of children can be impacted differently by harmful content.</li></ul>
<p><b>Ofcom's Causes and Impacts of Harm to Children Online</b></p> <ul style="list-style-type: none"><li>• The Causes and Impacts of Harm to Children Online contains Ofcom's Children's Register and Harms Guidance should provide you with context to help you consider the potential reach and impact of any content harmful to children on your service. Consider:<ul style="list-style-type: none"><li>○ What user data tells you about user base demographics on your service, for example the number of children which could be impacted;</li><li>○ How does your service's user base demographics influence the way harm is experienced on your service? You might consider:<ul style="list-style-type: none"><li>a) Any data or analysis you may hold on behaviour of children on your service and how this could evidence the way they experience harm;</li><li>b) How user base demographics may affect the way in which children experience harm on your service; and</li><li>c) How different children (including in age groups if you have this information) on your service may be impacted by harm.</li></ul></li></ul></li></ul>



- The Children’s Register also sets out evidence about the different kinds of harms, and the Guidance on Content Harmful to Children gives examples of the kinds of content that may be included in each category of PC and PPC. These will help you make an assessment of the level of risk of harm that might be suffered by children.

#### Other characteristics

- Are there any other characteristics that apply to your service (including in relation to functionalities, user-base, business model and governance, systems and processes) that you have identified may increase the impact of harm to children? This could include functionalities which may amplify harmful content which means children may repeatedly encounter it.
- Are adults able to contact or search for children on your service?

#### Frequency of use

- Consider whether you have any features or functionalities which affect how much children will use the service. The more time a child spends on a service the more impactful the risk of CHC may be.

#### Core and enhanced evidence

- The kinds of evidence you may use to assess the risk of harm to children on your service is set out in section 5 of this guidance.
- Is there any evidence from core inputs about the experience of harm and its impact? for example:
  - What user complaints and reports regarding the harm tells you about impact on children and other individuals.
  - What user data may tell you about behavioural insights relating to how children experience harm.
- If you have consulted core evidence inputs and are still unsure about the likelihood of this harm, then consider any additional evidence based on the information from **enhanced inputs**. You may consider:
  - What user research and consultation with users tells you about impact on users and other individuals; and
  - What independent experts or research tells you about the impact of harm on a service of your type.

## Risk Level Table for Content Harmful to Children

- 4.65 To help service providers make this judgement, we have created a Risk Level Table which sets out a high-level description of each risk level. This is a general overview of the factors that might inform different levels of risk based on information service providers will gain through Children’s Risk Profiles, evidence about how harm is experienced on their platform and how the service’s characteristics increase or decrease risks.
- 4.66 Most service providers will have at least one risk factor for their service associated with each kind of content harmful to children. We generally expect that the more risk factors a service has, the higher risk it is likely to be for the associated harm.

- 4.67 The table includes several alternative risk factors that service providers might chose to consider in their assessment of likelihood and impact. These are not cumulative factors, i.e. it might be sufficient for a service to meet only one of the criteria to reach a conclusion on likelihood or impact, and service providers should consider all risk factors to make their judgement.
- 4.68 The table should not be read as a set of criteria that necessarily need to be met in order for an assessed risk to be classified at these levels. It is intended to help inform your judgement on a risk level. Service providers may choose to consider other risk factors that are more relevant in their specific context.

**Table 4.4: Risk Level Table**

Risk level	Description	Your service may decide on this risk level if some or all the following conditions are met
High risk	You assess that there is a <b>high likelihood</b> that children could encounter this kind of content on your service	Any of the following applies: <ul style="list-style-type: none"> <li>You have identified many specific risk factors<sup>25</sup> in the relevant Children’s Risk Profiles* (Step 1) which increase the likelihood of children encountering this kind of content, <b>and</b> there are no effective systems and processes in place to address this risk nor other factors which reduce risks to children from encountering this content.</li> <li><b>Or</b> your service does not prohibit this kind of content** <b>and</b> there are no effective systems and processes in place to address this risk nor other factors which reduce risks to children from encountering this content.</li> <li><b>Or</b> there is evidence that this kind of content is very likely to be encountered or is in fact commonly encountered by children on your service (for example evidence from external experts, research on child media consumption habits, or evidence from complaints).</li> </ul>
	You assess that there is <b>high impact</b> to children using your service or	Any of the following applies: <ul style="list-style-type: none"> <li>Based on your analysis of evidence, you identify that the impact to children (users of your service or others affected<sup>26</sup>) from encountering this kind of content would be severe (for example, based on the nature of the content</li> </ul>

<sup>25</sup> We consider ‘many’ to be a large number of risk factors in proportion to the total number of risk factors for a particular kind of CHC in the Children’s Risk Profiles. The number of risk factors we have identified for different kinds of CHC in the Children’s Risk Profiles varies in line with the evidence available and the way that content is encountered. A kind of CHC which involves many different pathways and behaviours may have more evidence available, and in turn more risk factors associated with it than one that has fewer. Therefore, for a kind of CHC with a small total number of risk factors, even a few may be considered ‘many’. Similar considerations apply to ‘several’ and ‘few’ for the risk levels below.

<sup>26</sup> One example could be violent content. There are links between content promoting or encouraging violence and triggering specific acts of violence or normalising the carrying of weapons. Children encountering this content may therefore risk causing significant harm to their peers or others in their community. See section on ‘Violent Content’ in the Children’s Register of Risk.

Risk level	Description	Your service may decide on this risk level if some or all the following conditions are met
	other children from this kind of content	<p>encountered by children on the service or the nature of the harm indirectly suffered by children outside the service, the way in which users encounter it, or that children who encounter it or who are indirectly harmed are children in vulnerable groups).</p> <ul style="list-style-type: none"> <li>• <b>Or</b> there is broad scope for this kind of content to impact many children. This may apply if any of the following is true: <ul style="list-style-type: none"> <li>○ Evidence indicates that it is likely that your service has more than 1 million monthly UK users who are children***;</li> <li>○ <b>Or</b> your service is likely to have a very high frequency of use among children or very high time spent by children.</li> <li>○ <b>Or</b> your service actively targets children as a primary audience, with large volumes of content or many kinds of content and functionalities that are strongly appealing to children;<sup>27</sup></li> <li>○ <b>Or</b> content can be shared and disseminated on your service in a way that has the potential to become viral rapidly and affect many children.</li> </ul> </li> <li>• <b>Or</b> there is evidence that this kind of content is impacting many children overall (users of your service or others affected), or is impacting children in groups that are vulnerable.</li> </ul>
<b>Medium risk</b>	You assess that there is a <b>moderate likelihood</b> that children could encounter this kind of content on your service	<p>Any of the following applies:</p> <ul style="list-style-type: none"> <li>• You have identified several specific risk factors<sup>28</sup> in the relevant Children’s Risk Profiles* (Step 1) which increase the likelihood of children encountering this kind of content <b>and</b> there are some systems and processes in place to</li> </ul>

<sup>27</sup> This condition sets a substantially higher bar than the bar set to describe a service “of a kind likely to attract a significant number of users who are children” in the Children’s Access Assessment Guidance (i.e. a service meeting the child user condition in stage 2 of the assessment). In the latter case a service may meet the child user condition even if it does not actively target children, for several reasons (e.g. the service has the potential to benefit children). See the Children’s Access Assessment Guidance.

<sup>28</sup> Some risk factors, while distinct, may have a similar effect on your service (such as a situation where your service allows users to post videos, and is also a video-sharing service). In these situations, you may choose to consider the risk factors together. Separately, some distinct risk factors may combine or intersect and increase risk, as noted in the Risk Profiles (such as livestreaming intersecting with the group messaging and commenting functionalities of a service). In these situations, you should consider how the effect of particular risk factors may be amplified by other risk factors with which they combine or intersect.

Risk level	Description	Your service may decide on this risk level if some or all the following conditions are met
		<p>address this harm but you cannot demonstrate they are effective at reducing risks to children.</p> <ul style="list-style-type: none"> <li>• <b>Or</b> your service does not prohibit this kind of content** and there are some systems and processes in place to address this harm but you cannot demonstrate they are effective at reducing risks to children.</li> <li>• <b>Or</b> there is evidence that this kind of content is likely to be encountered or is in fact encountered by children on your service (for example evidence from external experts, research on child media consumption habits, or evidence from complaints).</li> </ul>
	<p>You assess that there is <b>moderate impact</b> to children using your service or other children from this kind of content</p>	<p>Any of the following applies:</p> <ul style="list-style-type: none"> <li>• Based on your analysis of evidence, you identify that the impact to children (users of your service or others affected) from encountering this kind of content would be moderate.</li> <li>• <b>Or</b> there is some scope for this kind of content to impact many children. This may apply if any of the following is true: <ul style="list-style-type: none"> <li>○ Evidence indicates that it is likely that your service has between 100,000 and 1 million monthly UK users who are children***;</li> <li>○ <b>Or</b> your service is likely to have high frequency of use among children or high time spent by children.</li> <li>○ <b>Or</b> your service includes content or functionalities that are strongly appealing to children;</li> <li>○ <b>Or</b> content can be shared and disseminated on your service in a way that has the potential to affect several children.</li> </ul> </li> <li>• <b>Or</b> there is evidence that this kind of content is impacting some children (users of your service or others affected).</li> </ul>
<b>Low risk</b>	<p>You assess that there is a <b>low likelihood</b> that children could encounter this content on your service</p>	<p>Any of the following applies:</p> <ul style="list-style-type: none"> <li>• You have identified no or few specific risk factors in the relevant Children’s Risk Profiles* (Step 1) which increase the likelihood of children encountering this kind of content.</li> <li>• <b>Or</b> there are comprehensive systems and processes in place to limit exposure of children to this content and evidence shows that they are very effective at minimising likelihood of exposure (for example, all content is pre-moderated).</li> </ul>

Risk level	Description	Your service may decide on this risk level if some or all the following conditions are met
		<ul style="list-style-type: none"> <li>• <b>Or</b> there is no evidence that this kind of content is likely to be encountered by children on your service.</li> <li>• <b>Or</b> there is no evidence that this kind of content is being encountered by children on your service.</li> </ul>
	You assess that there is <b>low impact</b> to children using your service or other children from this kind of content	Any of the following applies: <ul style="list-style-type: none"> <li>• There is limited scope for this kind of content to impact children.</li> <li>• <b>Or</b> there is no evidence that this kind of content is impacting children (users of your service or others affected).</li> </ul>
<b>Negligible risk</b>	If your assessment shows it is extremely unlikely that children encounter this kind of content on your service, you may assess the risk of that harm as 'negligible'.	

\* For the avoidance of doubt, a service with few risk factors for the kind of content in question may still have a high or medium risk for that kind of content, depending on the assessment of relevant evidence and factors as set out in this guidance. Separately, the risk factors condition is unlikely to apply to Search services. Instead, Search services should rely on information in the Register and their own evidence to make an assessment of likelihood.

\*\* For the avoidance of doubt, a service that prohibits a kind of content in question may still have a high or medium risk for that kind of content, depending on the assessment of relevant evidence and factors as set out in this guidance.

\*\*\* In some instances, the number of children may be a weak indicator of risk level, and service providers should consider this indicator alongside other factors. In any case, a service with a number of children that meets or exceeds the indicative values provided above would need robust evidence to demonstrate it does not pose high or medium risk. In addition, given the limitations regarding the reliability of many types of age data (e.g. data from self-declaration), you should take a conservative view on the likely number of children on your service. For instance, if your service has a high number of overall users, we expect you to assume that there is also a high number of children, unless you have strong evidence to demonstrate otherwise.

## Step 3. Decide measures, implement and record

### Decide what measures you need to take to reduce the risk of harm

- 4.69 As a key outcome of Step 2 of the risk assessment, you will have assigned a risk level to each kind of content harmful to children. You now need to decide what your service is going to do to reduce the risks of harm to children that you have identified and deliver on the Child Safety Duties.
- 4.70 You should refer to Ofcom's Children's Safety Codes of Practice on content harmful to children. An overview of recommended measures and which service providers they apply to is provided in the Introduction section of Volume 5.

- 4.71 The output of your children’s risk assessment for each kind of content harmful to children can influence which of the measures in our Children’s Safety Codes are recommended for your service:
- a) If you identify high or medium risk on your service for at least two kinds of content harmful to children (irrespective of whether they are PPC, PC, NDC or a combination of these), your service is considered “multi-risk”.<sup>29</sup> This will bring your service into scope of certain measures recommended for “multi-risk” services. For instance, many of our recommended governance measures (e.g. having a written statement of responsibilities for senior staff members, ensuring compliance trainings for staff involved in the design and operational management, etc.) and content moderation measures (e.g. setting and tracking performance targets for their content moderation systems, ensuring that human moderators are appropriately trained, etc.) apply to “multi-risk” services.
  - b) If you identify high or medium risk on your service for particular kinds of content harmful to children, this will bring your service into scope of other measures that target risks related to specific kinds of content. For example, the Recommender System measure RS1 related to PPC is recommended for services with high or medium risk for at least one kind of PPC; the User Support measure US1 related to group chats is recommended for services with high or medium risk for at least one of pornographic, bullying, abuse and hate, violent and eating disorder content.
- 4.72 Note that, as well as the outcome of your children’s risk assessment, some codes measures refer to other factors in specifying which services are recommended to implement the measure. These factors vary depending on the measures and may include whether your service is large and whether it has other relevant characteristics (e.g. whether your service has a recommender system; whether your service uses community moderation).
- 4.73 You can also choose to implement alternative measures to comply with the children’s safety duties. Should you do so, you will need to record what measures you have taken and demonstrate how these measures reduce the risk of harm to children and achieve the safety duties. Further information on how to record your assessment is provided in the Guidance on Record Keeping and Review and guidance on what to record is included in detailed guidance for Step 3.
- 4.74 You may also already have some measures in place to reduce the risk of harm to children which you think meet the children’s safety duties. Should this be the case, you should record these existing measures and decide whether additional measures are needed.
- 4.75 If, following Step 2, you have assigned a low or negligible risk level to your service for all kinds of content harmful to children, your service will not be in scope of codes measures that are recommended for services with high or medium risks (either “multi-risk” services or services with high or medium risk for specific kinds of content harmful to children). If you are already implementing measures (whether those we recommend for services with high or medium risks in our Children’s Safety Codes or others), we consider that it will be prudent to continue doing so. If you stop implementing existing measures, this may constitute a significant change (information on what may constitute a

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<sup>29</sup> For example, your service should be considered “multi-risk” if you identify high or medium risk for content that promotes suicide and content that promotes self-harm; or high or medium risk for pornographic content and bullying content and abusive content.

significant change explained in section 6 of this guidance) and may increase your risk levels. If you make any changes to the existing systems, processes or other measures, this may also lead to an increase in your risk levels and in turn in the measures you should consider implementing.

## Consider any additional measures that may be appropriate

- 4.76 For some service providers, Ofcom's Children's Safety Codes will not be comprehensive in addressing all risks identified in a risk assessment. Service providers may identify additional measures which go beyond the Codes that will help them to address any residual risk to children on their service. Some service providers may be better placed to identify additional effective measures or innovative approaches to preventing harm to children.
- 4.77 We encourage service providers to consider such additional measures to manage or mitigate the risks they have identified. Good practice in risk management indicates that organisations are likely to be more effective at prioritising and managing adverse events when they have a good understanding of their residual risk levels (the risk that remains after controls are put in place). Such measures may assist service providers overall to protect their users and others from harm on their service.
- 4.78 In addition, some service providers may be well placed to identify effective measures or innovative approaches to preventing harm as an alternative to those included in Ofcom's Code of Practice. If you choose to use alternative measures, you should be able to demonstrate that they will be effective. In these cases, you must record what measures you have taken and demonstrate how these measures achieve the child safety duties (as described under section 3.1 of this guidance).

## Implement all measures to mitigate and manage risk

- 4.79 Once the measures have been decided, you should implement them, taking into account any transition period arrangements specified by Ofcom.

## Record the outcomes of your children's risk assessment and how the safety duties have been met

- 4.80 At this stage, you should ensure you have created a record of all the aspects of your risk assessment, including details about how the assessment was carried out and its findings. Records should be durable, accessible, easy to understand, and up-to-date, as set out in our Guidance on Record Keeping and Review.<sup>30</sup>
- 4.81 Well maintained and accurate records and regular, timely reviews of compliance will help you to keep track of how you are complying with the child safety duties and ensure that the measures that you have taken are fit for purpose. The records will also provide a useful resource for Ofcom in monitoring how the relevant duties are being fulfilled.
- 4.82 In order to cover the relevant details about how the assessment was carried out, you should include the following information. We consider that this will help you to demonstrate that your children's risk assessment is suitable and sufficient, that you have

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<sup>30</sup> Refer to the [draft Guidance on record keeping and review](#) in our [Illegal Harms Consultation](#)

considered all of the elements of section 11 or section 28 (as applicable), and show the evidence you have relied on to assess the risks relevant to your service:

- a) What service the children's risk assessment applies to;
- b) The date the children's risk assessment was completed;
- c) If applicable, the date the children's risk assessment was reviewed or updated;
- d) Who completed the children's risk assessment;
- e) Who had oversight of and/or approved the children's risk assessment;
- f) The record should also include the following information regarding how you have undertaken the risk assessment, and its findings:
- g) Confirmation that your service has consulted Ofcom's Children's Risk Profiles. You may do this by recording the outcomes of the Children's Risk Profiles questionnaire, provided below (Annex A);
- h) A record of any risk factors from Ofcom's Children's Risk Profiles which are relevant to your service;
- i) Where applicable, a list of any additional characteristics (including user base, business models, functionalities, governance and systems and processes) you have considered alongside the risk factors identified in Ofcom's Children's Risk Profiles in Step 1. This should include identifying and assessing those functionalities that present higher levels of risk such as recommender systems, functionalities which enable adults to search for and/or contact children and predicting search functionalities;
- j) A list of the evidence that has informed the assessment of likelihood and impact of children encountering each kind of primary priority, priority and non-designated content. Where appropriate, this should also include any evidence used to consider the risk of CHC to children in different age groups or to the level of risk of harm which particularly affects individuals with a certain characteristic or members of a certain group;
- k) The assessed level of risk of children encountering each kind of primary priority, priority and non-designated content, and how the assessed risks were arrived at, including an explanation of any differences where assessed risk levels change between different age groups. Where appropriate, this should also include the level of risk to children assigned to features and functionalities on the service which affect how much children use the service and an assessment of different ways in which the service is used and the impact of such use on the level of risk of harm that might be suffered by children;
- l) A record of any measures from Ofcom's Children's Safety Codes that have been or are planned to be implemented, and any measures that are not in use;
- m) A record of any measures that are alternatives or additional to those set out in Ofcom's Children's Safety Codes, with an explanation how the measures meet the relevant duties;
- n) Confirmation that the findings of the children's risk assessment have been reported through appropriate governance channels; and
- o) Information regarding how your service takes appropriate steps to keep the risk assessment up to date (for example, a written policy).



## Step 4. Report, review and update

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### Report on the risk assessment and measures via relevant governance channels

- 4.0 All services must keep a record of their children’s risk assessment, including details of how the risk assessment was done and its finding.<sup>31</sup> Additionally, if you are a Category 1 or 2A service, then you must supply Ofcom with a copy of your children’s risk assessment as soon as reasonably practicable after making or revising your children’s risk assessment.<sup>32</sup> Category 1 services must also include a summary of their children’s risk assessment findings in their Terms of Service,<sup>33</sup> and Category 2A services must include a summary of their children’s risk assessment findings in a publicly available statement.<sup>34</sup>
- 4.1 Reporting on risk is a key element of good practice in risk management. Accurate and timely reporting through appropriate governance channels improves organisational oversight of risk and leads to better risk management outcomes.
- 4.2 Our Children’s Safety Codes and Illegal Harms Codes include specific Governance measures to help service providers meet their separate safety duty to mitigate and manage risk. Having in place adequate governance can also ensure that your service can conduct a suitable and sufficient risk assessment and record it appropriately to meet the risk assessment duty. This also helps to consider the range of risks identified in your latest risk assessment.
- 4.3 Where possible, we recommend that you consider reporting on your children’s risk assessment outcomes and measures you plan to implement or have implemented to the most senior body in relation to the review of risk management activities.
- 4.4 Smaller service providers are less likely to have formal organisational governance structure such as oversight boards or internal assurance functions. However, you can still improve the oversight of risks by reporting to a senior manager with responsibility for online safety duties for risk of harm to children.

### Notify Ofcom of any incidence of NDC

- 4.5 **If you provide a U2U service** and you identify the presence of any kinds of non-designated content through your children’s risk assessment you have a duty to report this to Ofcom.<sup>35</sup> Service providers should inform Ofcom of the following:
- a) the kinds of content identified as non-designated content; and
  - b) the incidence of such NDC on the service.
- 4.6 Service providers should ensure that they treat any identified NDC as a kind of content harmful to children and that they risk assess it separately as part of their children’s risk assessment duties.

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<sup>31</sup> Section 23(2) of the Online Safety Act 2023.

<sup>32</sup> Section 23(10) and 34(9) of the Online Safety Act 2023.

<sup>33</sup> Section 12(14) of the Online Safety Act 2023.

<sup>34</sup> Section 29(9) of the Online Safety Act 2023.

<sup>35</sup> Section 11(5) of the Online Safety Act 2023.

## Monitor the effectiveness of your safety measures

- 4.7 Monitoring the effectiveness of the measures you implement is important for ongoing risk management and to reduce the risk of harm to children. This will also help you keep your risk assessment up to date, as we explain in the section below on 'How to keep a children's risk assessment up to date'.

## Review your children's risk assessment

- 4.8 You will need to keep your children's risk assessment up to date. You should do this by reviewing your existing children's risk assessment annually. As we explain in the section below on 'How to keep a children's risk assessment up to date', a review requires you to check that the latest children's risk assessment still accurately reflects risks on your service. If there have been very few and minor changes to the design, operation and user base of your service since the last risk assessment, there are unlikely to be substantial changes to your risk assessment findings.
- 4.9 There are also triggers which will require you to review your children's risk assessment outside of an annual cycle, or to carry out a new assessment on your service. These are:
- a) Review your assessment if Ofcom makes a significant change to Children's Risk Profiles;
  - b) Carry out a new assessment before making a significant change to the design or operation of your service;
- 4.10 Further guidance on reviewing a risk assessment, including what constitutes a significant change, is provided in the section 6 of this section.
- 4.11 When considering whether you should review or update your risk assessment, you should also consider the impact of this action on the findings or understanding you have of illegal harms on your service. In some instances content harmful to children may amount to illegal content, and despite the requirement to hold separate records of your assessments you should consider the risk to children presented by different kinds of legal or illegal content<sup>3637</sup>

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<sup>37</sup> Ofcom's guidance on content harmful to children contained in The Causes and Impacts of Harm to Children Online contains guidance on the kinds of content which could amount to illegal content and where the threshold may be in these instances, refer to Ofcom's guidance on content harmful to children section in Volume 3 for more information.

## 5. What evidence to assess

- 5.1 This section of the Guidance presents the different types of evidence that you should consider when assessing the risk of children encountering content harmful to children on your service.
- 5.2 It provides guidance on how to decide what evidence you need to be able to demonstrate that your risk assessment is suitable and sufficient.

### Why is evidence important?

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- 5.3 To be suitable and sufficient, your children's risk assessment should accurately reflect the risk of children encountering harmful content on your service. It is important that you have an accurate understanding of the risks to implement appropriate safety measures.
- 5.4 This means that your judgments on risk should be based on relevant information and evidence as far as possible.
- 5.5 We understand that the appropriate level of evidence will vary based on the size and nature of the service. Therefore, we provide advice on **core types of evidence** that all service providers should consider when assessing the risk of children encountering CHC.
- 5.6 In some instances, the core evidence inputs will be insufficient to help a service reach an informed conclusion about the level of risk of a harm on their service, in these instances service providers should also consider which **enhanced types of evidence** will help them to accurately assign a risk level to children encountering a kind of CHC. We provide additional guidance below to help service providers understand which evidence inputs will be relevant to their service.
- 5.7 When considering any type of evidence, you should also consider privacy rights and your duties under the UK GDPR.<sup>38</sup>

### How should you decide what evidence to collect?

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- 5.8 The purpose of the children's risk assessment is to improve your understanding the level of risk of harm to children on your service and what safety measures you need to put in place to protect children. The guiding principle when deciding what evidence to collect should be whether it will **improve the accuracy** of your children's risk assessment and your **understanding of the level of risk of harm suffered by children on your service**.
- 5.9 In Step 2 (assess the risks), you should review your evidence to assess the likelihood and impact of children encountering each kind of content harmful to children.
- 5.10 In this step, **you should consider for each kind of content harmful to children, all the core inputs and any other relevant information you already hold**. Then, at each stage

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<sup>38</sup> See the ICO's [guidance and resources on the UK GDPR](#)

of your analysis, you should consider whether you have sufficient information to reach accurate conclusions on the level of risk for that content harmful to children. If not, you should consider gathering additional evidence from the list of enhanced inputs.

- 5.11 This can take place as an iterative process, with service providers collecting further information as needed until their evidence base and analysis can support a suitable and sufficient assessment.
- 5.12 For each kind of content harmful to children, consider whether the information you hold is sufficient to allow you to assess the level of risk on your service based on likelihood and impact. This requires a good understanding of the specific context of the service, the combinations of risk factors present, and the effectiveness of any safety measures you currently have in place.
- 5.13 We expect all service providers to use **core inputs** as part of their assessment of the risk of children encountering content harmful to children on your service. And we expect using **enhanced inputs** if your service is large or complex, or if you are not confident that the core inputs have given you an accurate assessment of the risk of children encountering content harmful to children to allow you to undertake a suitable and sufficient assessment.
- 5.14 Each kind of input is explained in the next sections. While we expect for core and enhanced inputs to provide service providers with a good understanding of risk, the suggestions are not exhaustive. Service providers should consider whether they need to consider any additional inputs to ensure their children's risk assessment is suitable and sufficient.

## What is a core input?

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- 5.15 **All service providers are expected to use core inputs** as a starting point for their risk assessments. Some service providers may find that the core inputs alone give them enough evidence to accurately assess the level of risk to children on their service. This could be the case where:
  - a) Ofcom's Risk Profiles identify no or very few risk factors relating to content harmful to children (suggesting a potential lower level of risk on the service); or
  - b) Evidence from the core inputs enables you to determine the likelihood and impact of a harm on your service and to use the Risk Level Table to assign a risk level this kind of illegal harm; or
  - c) The enhanced inputs will be of limited value in assessing risk on your service.
- 5.16 Core inputs include information that all service providers can access, such as user complaints and the relevant sections of Ofcom's Children's Register of Risks. We expect all service providers to consult all core inputs as part of their children's risk assessment, they represent the minimum evidence threshold for service providers to produce a suitable and sufficient assessment.
- 5.17 The core inputs should also include any information you already have which is relevant to your risk assessment.
- 5.18 Failing to consider all core inputs may mean that the children's risk assessment is not suitable and sufficient.

**Table 5.1: Core evidence inputs**

Core inputs	Explanation
<p><b>Children’s Risk Profiles, relevant parts of Ofcom’s Children’s Register of Risks and Harms Guidance</b></p>	<p>You have a duty to take account of the relevant <b>Children’s Risk Profile</b> as part of your risk assessment. All the information presented in the Children’s Risk Profiles is based on the evidence in our Children’s Register.</p> <p>The <b>Children’s Register of Risk</b> provides more detailed information on the characteristics of your service that may affect the level of risk of children encountering content harmful to children. We encourage service providers to consult the relevant section of the Children’s Register of Risk. You can prioritise the most relevant parts of the Children’s Register of Risk once you have established your risk factors in Step 1. The Children’s Register of Risk looks at each kind of content harmful to children, in some cases grouping similar kinds of harmful content. Each chapter presents a summary box and full analysis of risk factors associated to a kind or kinds of content harmful to children.</p> <p>Consulting these resources <b>will help you understand the risk factors</b> you identified in the Children’s Risk Profiles so you can understand what further information you should gather to assess the risk of children encountering content harmful to children on your service.</p>
<p><b>User complaints, including user reports</b></p>	<p>Under the Act, you are required to provide easy-to-access and use complaints procedures which allow complaints and reports to be made by users and for you to take appropriate action. You should consider any data from these complaints when carrying out your risk assessment. If you have not collected this information before and set up a new user reporting function, you should consider any reports when you update your risk assessment.</p> <p>This could include the kind of content harmful to children being complained about, the accuracy of complaints, any relevant data on the users making these complaints, and the length of time taken for an appropriate action to be taken.</p> <p>This input should help you understand the impact and frequency of a certain content harmful to children on your service. <b>User complaints will help you assess the likelihood (how many user complaints) or impact (the nature of user complaints) of harm occurring on your service.</b></p>
<p><b>Where relevant, user data including age insights</b></p>	<p>By user data we mean data you hold that has been provided by users, including their personal data (for example, data provided when a user sets up an account), and data about users that you have created, compiled or obtained (for example, data relating to when or where users access a service or how they use it). You may already hold this kind of user data, for example for analysis via behaviour identification technology or user profiling technology.</p> <p><b>Service providers have a duty to consider the age of children on their site in relation to their assessment of each kind of content harmful to children, and can do so with any relevant evidence they hold on user age including self-declaration.</b></p> <p>Considering user data, in combination with other inputs into the risk assessment, will help you understand if any particular child groups are at risk of encountering content harmful to children on your service. This is relevant</p>

Core inputs	Explanation
	<p>because, as set out in the Risk Profiles and Register of Risk, certain harms are disproportionately likely to affect certain demographic groups (e.g., children with mental health conditions are more likely to encounter content promoting suicide, self-harm and eating disorders). <b>User data will therefore help you determine the impact of each kind of content harmful to children<sup>39</sup> on your service<sup>(Obj)</sup>.</b></p> <p>User data also includes any data held as a result of age assurance and age verification processes. When considering user data, you must also consider privacy rights and your duties under the UK GDPR. This is likely to be of greater consideration for age assurance and age verification measures. We encourage you to consult the ICO's guidance on UK GDPR requirements<sup>40</sup> and the Age Appropriate Design Code.<sup>41</sup></p>
<b>Retrospective analysis of incidents of harm</b>	<p>Following any significant incident of harm experienced on your service, you should undertake retrospective analysis or a 'lessons learned' exercise. This information should inform your children's risk assessment. A significant incident could include, for example, a major incident that causes serious harm, a prominent trend in CHC, or an individual piece of content which becomes widely disseminated. <b>Retrospective analyses will help you assess the impact of different kind of content harmful to children on your service, particularly those harms which are less common but high impact.</b></p> <p>Such case studies may allow service providers to examine how particular aspects of the service's design (such as user characteristics, functionalities, recommender systems) may have played a role and where mitigating measures (such as content moderation, terms of service, user reporting) and associated processes could have been more effective.</p>
<b>The findings of your illegal harms risk assessment</b>	<p>All service providers completing a children's risk assessment will also have to complete an illegal harms risk assessment. The findings of the illegal harms risk assessment should include assessment of assessment of the features, functionalities, user base and characteristics of the service.</p>
<b>The findings of your Children's Access Assessment</b>	<p>The findings of your Children's Access Assessment will help you understand your userbase.</p>
<b>Results of content moderation systems</b>	<p>Most service providers are likely to have a content moderation system in place on their service, though the scope and maturity of these systems varies significantly between services.</p> <p>You may choose to operate a more sophisticated content moderation system which measures more complex types of exposure if you are seeking to improve your understanding of and response to content harmful to children. For example, measuring how long a piece of content harmful to children is present on your service, how children may be encountering this content, or the virality of pieces of content, rather than only the number of user reports and steps taken in response.</p>

<sup>39</sup> Refer to the Introduction section of Volume 3 for more information.

<sup>40</sup> See the ICO's [guidance and resources on the UK GDPR](#)

<sup>41</sup> See the ICO's [Children's Code guidance and resources](#)

Core inputs	Explanation
	<p>Assessing the effectiveness of content moderation decisions and the systems themselves also helps you to understand the level of mitigation provided by this measure in your risk assessment.</p> <p><b>Including this in your children’s risk assessment will help you understand the likelihood of children encountering content harmful to children on your service, the effectiveness of your mitigation measures, and the effect of different characteristics of your service on risk levels</b> (e.g. if a product change increases/reduces the amount of content harmful to children you detect).</p>
<p><b>Other relevant information</b></p>	<p>If you hold any other relevant evidence or data which may help you improve your understanding of risk on your service, you should consider it as part of your risk assessment.</p> <p>For example, any existing harms reporting, user engagement and complaints (particularly negative signals from children regarding suggested content), published research, reports provided to you by expert groups or by law enforcement agencies, data on user behaviour relating to harms, or the outcomes of product testing.</p> <p>You may also find relevant to consider other risk-based or impact assessments you have already conducted to meet other regulatory obligations such as the Digital Services Act (DSA) or to comply with privacy and data protection laws in the UK.</p> <p>In addition, service providers may have evidence or data about specific features or functionalities. For example, from product testing them, optimising the design of the service, or running A/B tests to understand their adoption, including by child users. We would expect the availability of this information to be considered when risk assessing service features and functionalities, including to inform how the service might be used by children.</p> <p><b>Any other information you hold that can support your risk assessment. You may want to also consider additional enhanced inputs.</b></p>

## What is an enhanced input?

- 5.19 We expect that **service providers may also use enhanced inputs** if your service is large or complex, or if you are not confident that the core inputs have given you an accurate assessment of the risk of children encountering content harmful to children to allow you to undertake a suitable and sufficient assessment. This is likely to be the case where:
- a) Evidence from the core inputs does not enable you to determine the likelihood and impact of CHC on your service, and therefore you are unable to assign a risk level for a kind of CHC using the Risk Level Table (Table 5.1);
  - b) Service providers identify several risk factors for a certain harm, indicating that kind of CHC is more likely or could have a higher impact on their service;
  - c) You are a large service with the resources to undertake a more thorough assessment and it is likely to materially improve the quality of your risk assessment. We would generally expect large services, those which reach more than 7 million monthly UK users, to use enhanced inputs.

- 5.20 The enhanced inputs are types of evidence which some services should consider if they hold them or when the core inputs are not enough to help them assign an appropriate risk level. Services considering enhanced inputs may wish to include some or all of the types of inputs suggested below.
- 5.21 Large service providers or service providers which have identified several specific risk factors on their service for a harm using the Children's Risk Profiles will typically need to include some or many enhanced inputs to ensure their risk assessments are suitable and sufficient. We illustrate with examples in the box below.

#### Illustration: Using core and enhanced inputs

The following examples illustrate how we expect service providers to consider which inputs are appropriate for each harm they are assessing:

**Example 1:** Using the Children's Risk Profiles, Service A has identified several risk factors suggesting its service is high risk for a certain kind of content harmful to children. Service A gathers evidence from all the **core inputs**, but it finds very limited to no evidence of this harm occurring, despite the Children's Risk Profile indicating otherwise. There is therefore some ambiguity about how great the risk of that harm is, and the service is unable to determine accurately its likelihood or impact, and unable to assign a risk level using the guidance in the Risk Level Table. Service A then consults the list of **enhanced inputs** and selects inputs which will give more evidence relating to its risk factors to help it assign an accurate risk level and put appropriate measures in place.

**Example 2:** Using the Children's Risk Profiles, Service B has identified several risk factors suggesting its service is high risk for a certain kind of content harmful to children. Service B gathers evidence from all the **core inputs** and finds evidence of this harm occurring. This means the service has sufficient evidence to assess the likelihood and impact of the harm occurring on its service, and therefore it is able to assign itself a risk level for this harm using the Risk Level Table without including additional evidence from the enhanced inputs.

**Example 3:** Using the Children's Risk Profiles, Service C has identified no additional risk factors which suggests it could be low risk for a certain kind of content harmful to children. To assess whether this is correct, Service C gathers evidence from all the **core inputs** and finds multiple sources of relevant evidence which shows it is not at high risk for this harm to occur on its service. This means the service is able to determine the likelihood and impact of this harm occurring on its service and assign itself a risk level for his harm using the Risk Level Table without including additional evidence from the enhanced inputs.

- 5.22 The type and number of enhanced inputs a service considers when assessing the risk of a particular kind of CHC is down to you. This decision is likely to be informed by the risk factors you have identified in the Children's Risk Profiles and the size of your service. We provide descriptions of the different types of enhanced evidence below to help you decide if an input is relevant to your assessment of risk.



**Table 5.2: Enhanced evidence inputs**

Enhanced inputs	Explanation
<b>Results of product testing</b>	<p>To improve your understanding of risk on your service at a product level, you may consider running tests on individual products ahead of launching them on your wider services, in particular to understand how users behave and engage with the products and the potential impact of any behavioural biases. Evaluating data and insights gathered from these tests will improve your children’s risk assessment because testing may indicate the effect of any product changes and whether they may increase or decrease the likelihood of children encountering CHC, and its impact.</p> <p>For example, service providers running on-platform tests<sup>42</sup> of their recommender systems should include any additional safety metrics they gather as part of this routine testing to provide insights as to how minor changes may impact the risk of illegal content being disseminated on the service.</p> <p><b>Considering the results of product testing will help you understand certain risk factors which you may have identified in risk profiles, such as functionalities which allow users to find and encounter content, functionalities which allow users to communicate with one another and functionalities which allow users to network.</b></p>
<b>More complex analysis obtained from content moderation systems</b>	<p>As an enhanced input, we expect service providers to consider more granular or in-depth analysis such as evidence which relates to the effectiveness of content moderation system.</p> <p>As an enhanced input, <b>service providers may undertake this analysis to help them understand whether particular demographics of children, including inputs that inform user ages and vulnerabilities, face a higher risk level of harm that might be suffered by children.</b></p>
<b>Consultation with internal experts on risks and safety measures</b>	<p><b>To improve your understanding of a specific risk children may face, or a technical measure to mitigate such a risk, you should consult with experts.</b></p> <p>A thorough examination process for a technical safety measure should consist of regular thematic technical expert meetings supported with focused follow up work. This examination process should provide a clearer understanding of how technical measures, system and processes may help address risk. Consultation could happen regularly, and records of the engagement should feed into an annual assessment, or experts could be brought into the four-step process while the children’s risk assessment is underway to provide formal and targeted input.</p>
<b>Views of independent experts</b>	<p><b>This input is likely to be valuable when considering complex topics such as the kinds of content harmful to children, or the intersection of harms, mitigation measures, and the rights of children, including their freedom of expression.</b></p> <p>Expert consultation would help your service consider how a particular harm manifests online in general and/or on your service specifically, which would in turn help you develop mitigation and management techniques which are</p>

<sup>42</sup> By on platform testing of recommender algorithms we mean the process of testing two or more variants of recommender system before proceeding with the design change. This could include but it not limited to A/B/x Testing or Multi Arm Bandit (MAB) Testing.

Enhanced inputs	Explanation
	<p>targeted and effective. You should take steps to ensure the quality and accuracy of any third-party advice.</p> <p>Other types of expert consultation may also be relevant for your service to consider. This could include view of experts on children’s rights, industry trends, regulatory standards and the views of certain trade bodies or technical experts in relevant fields.</p>
<p><b>Internal and external commissioned research</b></p>	<p>If you are seeking to access additional expert resource and expertise to incorporate into your risk assessment, you may commission internal and external research. For instance, some service providers often commission research into specific trends or harms which informs their approach to safety and moderation on the platform.</p> <p><b>The purpose of this input is that expert research would allow your service to improve its understanding of the factors which may drive the likelihood of CHC appearing on your service, the impact of that CHC, and how the risk to children may be mitigated effectively.</b></p>
<p><b>Outcomes of external audit or other risk assurance processes</b></p>	<p><b>To improve your confidence that your trust and safety processes or wider risk management systems are robust, you may commission a third party to audit aspects of your service or undergo another form of risk assurance process.</b></p> <p>Independent audits can provide insights and analysis which service providers are unable to produce or assure themselves. They offer service providers the chance to be robustly assessed and offer the opportunity for service providers to identify new ways of improving their trust and safety processes.</p> <p>Service providers and any third-party suppliers should take steps to ensure that any methodology applied is robust and that the assurance process provides an independent and objective assessment of performance and recommendations for improvement.</p> <p>Including the outcomes of these audits in the children’s risk assessment process can provide greater independence and granularity of detail as to the accuracy and quality of the risk assessment. Service providers who lack in-house capacity to carry out these processes may benefit from seeking third party audits; some service providers may also choose to work with third parties to seek independent and objective scrutiny of their risk assessment processes.</p>
<p><b>Consultation with users and user research</b></p>	<p>To improve your understanding of child user experience or the experience of a specific group of children on your service, you may engage in consultation with children or carry out other forms of user research on children. You can choose the method and frequency of consultation and how you wish to undertake this engagement with users – this could include a service wide initiative which gives any children a chance to comment on different aspects of the service, or more targeted consultation with a specific child group on specific issues which the service has reason to believe will impact children. Alternatively, you may wish to contract external agencies to deliver qualitative research.</p> <p><b>This input is a form of user research which will help your service embed safety by design into your platform.</b> The research should complement existing user design processes but maintain a focus on understanding how</p>

Enhanced inputs	Explanation
	<p>child users might interact with a new product or service. Research could focus on what behavioural factors (e.g. behavioural biases or child developmental considerations) could be present at key points in a child’s user journey that could impact on their decision-making and increase the risk of children being exposed to CHC. This could be particularly important if a product or service is intended to operate as part of a broader ecosystem rather than on a stand-alone basis.</p> <p>A continued dialogue with users of your platform will help to ensure that safety features, mitigations and other key points of engagement (for instance, terms of service) are accessible and meets the needs of users. Engagement could be general or designed to target specific users, such as children with vulnerabilities or certain age groups.</p>
<p><b>Engaging with relevant representative groups</b></p>	<p>You may choose to engage with relevant representative groups to improve your understanding of the risk of CHC appearing on your site and being encountered by children. To do this, your service may reach out to organisations representing specific groups to help give these groups a channel through which they are able to directly feedback any concerns they have around the handling of CHC on your platform.</p> <p>This is a helpful action to take if your service has evidence that certain groups of children, such as those in specific age groups, will be particularly impacted by an aspect of your service’s design. <b>This is beneficial for service providers reviewing their children’s risk assessment in light of undertaking a specific significant change to an aspect of its service design.</b></p>

# 6. When to review and update your children's risk assessment

- 6.1 This section of the guidance explains the triggers established in the Act as well as Ofcom's guidance on when to review and/or update your existing risk assessment. This may vary according to the reasons for the risk assessment.
- 6.2 Some service providers may need to fully review their children's risk assessment (for example, as a matter of course every year), or target the review to specific aspects of the service (for example, due to the introduction of a new feature or functionality outside a regular annual review cycle).
- 6.3 We recognise that some services may want to consider their timing in the context of their obligations under other legal regimes (such as the EU Digital Services Act, or privacy and data protection impact assessments). This is a matter for individual service providers, provided that the approach they take meets their obligations under the Act.
- 6.4 After you have completed your first children's risk assessment, you must take appropriate steps to keep your children's risk assessment up to date, including by responding to key triggers.
- 6.5 The Act includes the following key duties on reviewing or carrying out a new risk assessment:
  - a) a duty to take appropriate steps to keep a children's risk assessment up to date;
  - b) a duty to update your children's risk assessment if Ofcom makes any significant change to a Children's Risk Profile that relates to the service of the kind in question; and
  - c) a duty to carry out a further suitable and sufficient children's risk assessment relating to the impacts of that proposed change before making any significant change to any aspect of your service's design or operation.

## Review and update your children's risk assessment at least every 12 months

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- 6.6 You have a duty to take steps to keep your assessment up to date. It is likely that your children's risk assessment will become out of date after a certain amount of time has passed, even if you have not made any significant changes to your service. Incremental changes to your service, trends in user behaviour and technological changes will alter the evidence base underpinning your assessment, which means you should review your assessment. You should review your children's risk assessment if the underlying evidence changes.
- 6.7 Reviewing your assessment can be done by considering your most recent children's risk assessment alongside any new evidence that you have collected during the operation of your service, or new developments in the external environment and the risks online which your assessment needs to account for. If you think the new evidence will impact

your assessment of the risk of children encountering harmful content then you should review each step of the four-step process with the updated evidence.

- 6.8 Reviewing and updating an existing children's risk assessment should not be as burdensome as carrying out a new children's risk assessment, it should take account of new evidence to update your most recent assessment.
- 6.9 You should decide your own policy for reviewing the children's risk assessment and for recording it. You should be able to explain your approach and what appropriate steps you are taking to meet this duty. A succinct written policy will be a valuable tool to help you to demonstrate compliance.
- 6.10 Your written policy on keeping a children's risk assessment up to date should include:
  - a) A timeframe for regular review. Ofcom recommends that risk assessments are reviewed at least every 12 months. This aligns with other common annual governance, reporting and compliance cycles, and with other international online safety regimes (including the Digital Services Act); and
  - b) A responsible person overseeing the children's risk assessment processes.

## Review and update if Ofcom makes a change to Children's Risk Profiles

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- 6.11 The Act requires Ofcom to review and revise its Children's Register of Risk and Children's Risk Profiles to keep them up to date.
- 6.12 If Ofcom makes a significant change to a Children's Risk Profile which is relevant to your service, you must review and update your risk assessment.
- 6.13 This can be done by considering your most recent children's risk assessment alongside Ofcom's changes to the Children's Risk Profiles, to understand if any aspect of your assessment needs to be updated. For example, new risk factors relevant to your service could have been added (e.g. new functionalities), or new links between risk factors and content harmful to children could have been identified (e.g. a functionality which increases the risk children encountering a certain kind of PC or PPC). If these changes are relevant to your service, you should consider if your assessment of the risk of children encountering each kind of harmful content needs to change.
- 6.14 If Ofcom's changes to a Children's Risk Profile have impacted your risk assessment, then you should review each step of the four-step process in light of Ofcom's change and update your record.
- 6.15 Reviewing and updating an existing assessment should not be as burdensome as carrying out a new risk assessment; it should take account of specific changes which Ofcom has made to Children's Risk Profiles.

## Carry out a new children’s risk assessment before making a significant change to your service

- 6.16 If you plan to make a significant change to your service, you must carry out a new children’s risk assessment before making the change. This applies to a change to any aspect of the service design or operation which is reasonably likely to have an impact on the risk to children. This is a specific legal duty, so you should carefully consider proposed changes to your service.
- 6.17 While the duty only requires you to carry out a new children’s risk assessment as it relates to the impacts of the proposed change, this may in practice require you to carry out a new children’s risk assessment of the whole service as it is unlikely that the significant change would not impact other aspects of the service. This new children’s risk assessment can be done by carrying out each step of the four-step process.
- 6.18 Below, we have provided guidance on what amounts to a significant change (Table 6.1). We indicate principles which would make a change significant and the types of scenarios that are likely to amount to a significant change.

**Table 6.1: What is a significant change**

Type of change	Guidance	Outcome
One overarching question you should consider when evaluating whether a change is significant is the number of children who may be, or who may be impacted, on your service. For instance, a relatively minor change on a platform with a high number of children is likely to have a significant impact, while it could take a much larger change on a smaller platform to trigger the need to review their risk assessment. <sup>43</sup>		
Likely to amount to a significant change	<p>Your proposed change is very likely to amount to a significant change on your service if any of the following apply:</p> <ul style="list-style-type: none"> <li>The proposed change alters the risk factors which you identified in your last children’s risk assessment</li> <li>The proposed change impacts a substantial proportion of your user base or changes the kind of user groups you expect to see on your service, <b>particularly the age or volume of children likely to use your service</b></li> <li>The proposed change impacts a vulnerable user group, such as children in a certain age group or with certain characteristics</li> <li>The proposed change impacts the efficacy of the measures you have put in place following your last</li> </ul>	If yes, you must carry out a new children’s risk assessment relating to this change

<sup>43</sup> As explained in our guidance on assessing impact, we expect services to consider the number or proportion of children on your service either confirmed or estimated with your best available information. Typically, we would expect that the larger the number of users, the greater the potential for children to be on the service, and therefore the greater the potential of impact and reach a proposed change to the service could have.

Type of change	Guidance	Outcome
	<p>assessment to reduce the risk of children encountering CHC on your service</p> <p>When considering these statements you should consider if any of the following apply to the proposed change:</p> <ul style="list-style-type: none"> <li>• Would the change clearly impact children, user experience or user behaviour in a way that may affect risk to children?</li> <li>• Does the change affect the ability or incentives users to create or share CHC on your service?</li> <li>• Will the change affect user reporting abilities – particularly something to consider if the change impacts the user interface or alters reporting processes?</li> <li>• Does the change include new functionalities or enable users to interact differently? For example functionalities or features which impact how much children use the service or those which enable adults to search for or contact children.</li> <li>• Does it include changes that would affect content or network recommendations on your service?</li> <li>• Does it include changes to your business model e.g. how you generate revenue, growth strategy?</li> </ul>	
<p>Unlikely to amount to a significant change but it may impact some aspect of the service design or operation</p>	<p>Your proposed change is unlikely to amount to a significant change on your service if any of the following apply:</p> <ul style="list-style-type: none"> <li>• The proposed change is unlikely to alter the risk factors which you identified in your last children’s risk assessment</li> <li>• The proposed change is unlikely to impact a substantial proportion of your user base or change the kind of users you expect to see on your service</li> <li>• The proposed change is unlikely to impact a vulnerable user group, such as children in certain age groups or children with certain characteristics</li> <li>• The proposed change impacts the efficacy of the measures you have put in place following your last assessment to reduce the risk of children encountering CHC on your service</li> </ul>	<p>You should review your assessment to ensure that it remains up to date</p>
<p>A very minor or routine change which will not impact any aspect of</p>	<p>Your proposed change is unlikely to amount to a significant change if the following statements apply:</p>	<p>No action needed; the change can be accounted for in the next</p>

Type of change	Guidance	Outcome
the service's design or operation	<ul style="list-style-type: none"> <li>• The proposed change does not alter the risk factors which you identified in your last children's risk assessment</li> <li>• The proposed change will only impact a small portion of non-child users and will not change the kind of users you expect to see on your service</li> <li>• The proposed change will not impact the efficacy of the measures you have put in place following your last assessment to reduce the risk children encountering CHC on your service</li> </ul>	scheduled review cycle

6.19 Examples of the types of design and operational changes which are likely to amount to a significant change include – but are not limited to – the following:

- a) Significant updates to the design of user-facing algorithms, systems and processing, for example changing the operation of the recommendation system, such as including a new input or changing the weighting of existing inputs. Key examples include:
  - i) Introduction of a new recommender system: this may include a recommender to suggest friends and groups to follow, alongside the existing content feed recommender. It may also include a complete replacement of the existing content recommender.
  - ii) Introduction of a new machine learning model within the existing recommender system: a service could implement a new machine learning model to enhance the predictions that are made by a recommender system (e.g. regarding whether a user will click on a piece of content, or whether that piece of content is clickbait). These new or enhanced predictions would in turn alter the content users are recommended
- b) Changing the “Goal Criteria” of Recommender Systems: the overall aims that the service has in mind for those systems (e.g. is it to maximise the number of views, the average viewing time, the diversity of content presented to users etc.?)
- c) Adding or removing functionalities: the children's risk assessment must assess the impact of functionalities on the risk of children encountering CHC and the level of harm they may suffer, so adding or removing functionalities – such as sharing content, direct messaging or live streaming – must be accounted for in the children's risk assessment.
- d) Updates to the design of user facing features: these may affect users' ability to report harm or which support media literacy and safe use.
- e) Changes to platform content rules: these may alter the types of content that users encounter and subsequently alter the sites userbase. For instance, the decision to allow or prohibit adult content on a platform.
- f) Updates to user facing functionalities and features such as changing the location of the report button or changing the design of icons related to reporting or reacting to content.
- g) Any acquisition that may change the core product offered to users for instance integrating functionality from another platform following a product acquisition.
- h) Significant changes in ownership or investment that may influence how the platform operates (a new owner may have different views on how the platform should operate).



# A1. Risk Profiles for Content Harmful to Children

## Supporting resources

- Children’s Register of Risks
- Glossary for Volume 3

- A1.1 The draft U2U and Search Risk Profiles for content harmful to children (‘Children’s Risk Profiles’) are resources to consult when conducting your children’s risk assessment. All services that are subject to the children’s risk assessment duties must take account of the relevant Children’s Risk Profile when conducting their own children’s risk assessment.
- A1.2 The Children’s Risk Profiles are made up of a list of different risk factors. After consulting the Children’s Risk Profiles (using our guidance), you should have a **list of your risk factors and key kinds of content harmful to children (CHC) associated with these risk factors** where relevant.<sup>44</sup> You should then assess these risk factors alongside your own evidence under Step 2.
- A1.3 These risk factors represent a selection of service characteristics (such as user base, business models and functionalities) that our draft **Register of Risks for content harmful to children (‘Children’s Register’)** indicates are most strongly linked to a risk of one or more kinds of CHC outlined in the Children’s Register.<sup>45</sup>
- A1.4 The Children’s Register provides a detailed analysis of the risks of harm to children posed by CHC that we have identified across U2U and search services. It therefore contains our evidence in full and in some cases identifies risk factors in addition to those highlighted in the Children’s Risk Profiles. The Children’s Risk Profiles will be updated as necessary when changes are made to the Children’s Register. Further information on the Children’s Register is available in Volume 3 (The causes and impacts of harms to children).
- A1.5 When consulting the list of risk factors, you should keep in mind:
- a) We do not include all the characteristics that may lead to a risk of harm. We do not include risk factors from the Children’s Register where we have more limited evidence, or where we have drawn parallels based on the similarity between two kinds of CHC.
  - b) Additionally, the description of the risks provided is a high-level summary only. The risk of harm presented by risk factors will vary depending on the context, including the combinations of risk factors present, the governance, systems and processes a service has in place, and the dynamics that may be unique to the kind of CHC or the nature of a service itself.<sup>46</sup>

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<sup>44</sup> The key kinds of CHC associated with a risk factor are those where our evidence indicated the strongest link. There may be other kinds of CHC which may be relevant. For further information, see Section 7 (Introduction to the Children’s Register of Risks).

<sup>45</sup> Table 7.1, Section 7, Volume 3 (Introduction to the Children’s Register of Risks)

<sup>46</sup> For further information on how we see these dynamics play out in our evidence base, see Section 7 (Introduction to the Children’s Register of Risks) and Section 7.14 (Wider context to understanding risk factors)

A1.6 Given this, you should see the Children’s Risk Profiles as your starting point to understand which kinds of CHC are most likely to be encountered by children on a service like yours, and which risk factors may play a role.

## U2U Risk Profile and risk factors

A1.7 The Ofcom U2U Risk Profile for content that is harmful to children (‘Children’s U2U Risk Profile’) is presented in Table A1.1 below. Each row represents a unique risk factor that services should consider when conducting their children’s risk assessment. The information provided on the risk factors in the table is based on the evidence in the Children’s Register.

A1.8 When consulting the table, services should do the following:

A1.9 **First**, answer the ‘Yes’ / ‘No’ questions in Figure 3 below about the characteristics of your service;<sup>47</sup>

A1.10 **Second**, use your answers to select which **specific risk factors** from Table A1.1 apply to you. Each ‘Yes’ answer corresponds to a risk factor you will need to take account of in your children’s risk assessment. For example, if you answered ‘Yes’ to questions 2a, 3b, and 6 then you should select those three risk factors from the risk factor table. A Glossary is available to help you interpret your risk factors;<sup>48</sup>

A1.11 **Third**, review the four **general risk factors** at the bottom of the risk factor table: user base age, other user base demographics, business model, and commercial profile. These apply to all services, and you will need to take account of each in your children’s risk assessment.

A1.12 After you have taken these three steps, you should have the list of risk factors you will need to take account of when conducting your own children’s risk assessment. This list includes any specific risk factors you have selected, plus all four of the general risk factors.

A1.13 Step 2 of the Children’s Risk Assessment Guidance provides details on how to use this list of risk factors as part of your children’s risk assessment. At Step 2, you will also consider how the risk factors you have selected affect your service (e.g. whether this is a risk that you are already managing, or one that you may need to address through a set of mitigations to help reduce the risk of harm to children).

**Figure A1.1. Questions for identifying your risk factors.**

Select Yes (Y) or No (N) for the following questions about your U2U service.	
1. Is my service any of the following service types? Select all that apply: <sup>49</sup>	
a. <b>Social media services</b> (services which connect users and enable them to build communities around common interests or connections)	Y / N
b. <b>Messaging services</b> (services that are typically centred around allowing users to send messages that can only be viewed or read by a specific recipient or group of people)	Y / N
c. <b>Gaming services</b> (services that allow users to interact within partially or fully simulated virtual environments)	Y / N
	Y / N

<sup>47</sup> If your service offers multiple versions – e.g. mobile and web – you should select ‘Y’ if *any* version of the service has the relevant characteristic(s). However, this only applies where versions are similar enough to be treated as a single service.

<sup>48</sup> If, after consulting the Glossary for Volume 3, you are still unsure if the risk factor applies to you, we would suggest you read the corresponding information provided about that risk factor in Table A1.1 and consider if this information is relevant to your service. You may also wish to consult Volume 3 (The causes and impacts of harms to children) for more detailed information on the corresponding risk factor or kind of CHC.

<sup>49</sup> A service may consider more than one service type to apply.

Select Yes (Y) or No (N) for the following questions about your U2U service.

<ul style="list-style-type: none"> <li>d. <b>Pornography services</b> (services whose principal purpose is the hosting or dissemination of pornographic content and who host user-generated pornographic content)</li> <li>a. <b>Discussion forums and chat room services</b> (services which allow users to send or post messages that can be read by the public or an open group of people)</li> <li>b. <b>Video-sharing services</b> (services that allow users to upload and share videos with the public)</li> </ul>	<p>Y / N</p> <p>Y / N</p> <p>Y / N</p>
<p><b>2. Does my service have any of the following functionalities related to how users identify themselves to one another? Select all that apply:</b></p> <ul style="list-style-type: none"> <li>a. Users can display identifying information through a user profile that can be viewed by others (e.g. images, usernames, age)</li> <li>b. Users can share content anonymously (e.g. anonymous profiles or access without an account)</li> </ul>	<p>Y / N</p> <p>Y / N</p>
<p><b>3. Does my service have any of the following functionalities related to how users network with one another? Select all that apply:</b></p> <ul style="list-style-type: none"> <li>a. Users can connect with other users<sup>50</sup></li> <li>b. Users can form groups or send group messages</li> </ul>	<p>Y / N</p> <p>Y / N</p>
<p><b>4. Does my service have any of the following functionalities that allow users to communicate with one another? Select all that apply:</b></p> <ul style="list-style-type: none"> <li>a. Livestreaming</li> <li>b. Direct messaging</li> <li>c. Commenting on content</li> <li>d. Posting images and videos</li> <li>e. Re-posting or forwarding content</li> </ul>	<p>Y / N</p> <p>Y / N</p> <p>Y / N</p> <p>Y / N</p> <p>Y / N</p>
<p><b>5. Does my service have any of the following functionalities that allow users to find or encounter content? Select all that apply:</b></p> <ul style="list-style-type: none"> <li>a. Searching for user-generated content</li> <li>b. Content tagging</li> </ul>	<p>Y / N</p> <p>Y / N</p>
<p><b>6. Does my service use content recommender systems?</b></p>	<p>Y / N</p>
<p><b>7. Does my service have functionalities and other features that increase user engagement?</b> (e.g. infinite scrolling and autoplay features, notifications and alerts)</p>	<p>Y / N</p>

<sup>50</sup> We describe ‘user connections’ as a user-to-user service functionality that allows users to follow or subscribe to other users. Users must sometimes be connected to view all or some of the content that each user shares. Further information on risk factors is available in Section 9 (Glossary for Volume 3).

**Table A1.1. U2U risk factors (Children’s U2U Risk Profile).**

Specific risk factors		
U2U services with relevant characteristics should take account in their risk assessment.		
1. Service type factors		
<input type="checkbox"/>	<b>1a</b> Social media services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Social media services</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk all kinds of CHC</li> </ul> <p>Many social media services are designed to maximise engagement between users and with content. They also typically enable users to connect and create communities with other users. If your service is a social media service, you should consider how this can increase the risk of children encountering CHC on your service. Research shows that social media services can increase the risk of children encountering all kinds of priority and primary priority content that is harmful to children.</p>
<input type="checkbox"/>	<b>1b</b> Messaging services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Messaging services</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to violent content and bullying content</li> </ul> <p>Messaging services allow users to protect their privacy. If your service is a messaging service, you should consider how this can play a role in children encountering CHC in a setting that is hidden from public view. Our evidence indicates that this can result in more targeted harmful behaviour, such as bullying content, and make detection more difficult. This can be particularly for messaging services with <u>encrypted</u> and <u>ephemeral messaging</u>, which may be more likely to be used by children sharing violent content.</p>
<input type="checkbox"/>	<b>1c</b> Discussion forums and chat room services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Discussion forums and chat room services</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content as well as suicide and self-harm content</li> </ul> <p>If your service is a discussion forum or chat room, you should consider how your service may be used to discuss and share CHC in a setting that is typically visible to the public. For example, our evidence shows that these services can act as spaces where suicide and self-harm is encouraged and eating disorder content is shared among dedicated communities.</p>
<input type="checkbox"/>	<b>1d</b> Gaming services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Gaming services</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to violent content, bullying content, and content which is abusive or incites hatred</li> </ul> <p>If your service is a gaming service, you should consider how it may bring children in contact with users who share CHC and result in harmful interactions. For instance, our evidence shows that children can often be bullied by users on these services. Children can also be excluded from games due to their identity and receive hateful messages.</p>
<input type="checkbox"/>	<b>1e</b> Pornography services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Pornography services</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to pornographic content</li> </ul> <p>If your service is a pornography service, you should consider how your service may be used by children to access pornographic content. While pornographic content can be encountered by children on a range of services, our evidence shows that pornography services are a key space in which children can search for and view pornographic content. They can also act as spaces where AI-generated pornography is shared and potentially encountered by children.</p>
<input type="checkbox"/>	<b>1f</b> Video-sharing services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Video-sharing services</li> <li>• <b>Key kinds of CHC*:</b> Violent content, eating disorder content, suicide and self-harm content, harmful substances content, and dangerous stunts and challenges content</li> </ul> <p>If your service is a video-sharing service, you should consider how your service may be used to disseminate harmful video content that can be encountered by children. For instance, our evidence indicates that violent content can often be encountered by children on video-sharing services and content encouraging eating disorder content can also be recommended to users that may include children.</p>

## Specific risk factors

U2U services with relevant characteristics should take account in their risk assessment.

### 2. User identification factors

<input type="checkbox"/>	<p><b>2a</b> Services with user profiles</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> User profiles</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content</li> </ul> <p>If your service allows users to create a user profile that displays identifying information that can be viewed by others (e.g. images, usernames, age), we expect you to take account of the risks that can arise from this. For example, our evidence indicates that children can see users (e.g. ‘influencers’) with a significant number of <u>user connections</u> (see 3a) displayed on their user profiles as trusted sources of information, creating a heightened risk of harm if eating disorder content is shared from these accounts. Children can also display pro-eating disorder information on their user profile, such as in their username, which can contribute to them receiving recommendations for eating disorder content and facilitate the creation of networks with other pro-eating disorder users.</p>
<input type="checkbox"/>	<p><b>2b</b> Services where users can post or send content anonymously, including without an account</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Anonymous user profiles<sup>51</sup> or users without accounts</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to violent content, content which is abusive or incites hatred, and bullying content</li> </ul> <p>Anonymity is an important tool for users (including children) to protect themselves from being identified and targeted for their views, particularly for marginalised communities and dissenting voices. However, our evidence indicates that if your service allows users to share content anonymously, risks can increase. Our evidence suggests these risks arise from the disinhibition effect, where users (including children) are emboldened because they cannot be identified by other users. For example, children can feel more encouraged to share violent content as they assume their actions will not be traced back to them and often encounter violent content through anonymous ‘invite-only’ profiles that are dedicated to sharing such content. Anonymity can also make encountering CHC such as bullying content more impactful, as not knowing who was involved can exacerbate the distress felt by children.</p>

### 3. User networking factors

<input type="checkbox"/>	<p><b>3a</b> Services with user connections</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> User connections</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to violent content, dangerous stunts and challenges content, suicide and self-harm content, and pornographic content</li> </ul> <p>User connections can allow children to build networks and help bolster the credibility of users that share CHC. They can also play a role in children being contacted as users sometimes must be connected to message one another. Our evidence shows that children can often be sent pornographic content by users who they are connected with but do not know. Children can also be connected to users that are known to share CHC such as self-harm content. This makes such content easier to find and helps create networks of users in which CHC such as online challenges and violent content can go ‘viral,’ especially when users are connected in large numbers. As mentioned in <u>user profiles</u> (see 2a), children can perceive accounts with a large number of connections displayed on their profile as an indicator of trust.</p>
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<sup>51</sup> We describe ‘anonymous user profiles’ as a user-to-user service functionality allowing users to create a user profile where their identity is unknown to an extent. This includes instances where a user’s identity (an individual’s formal or officially recognised identity) is unknown to other users, for example through the use of aliases (‘pseudonymity’). It also includes where a user’s identity may be unknown to a service, for example services that do not require users to register by creating an account. Further information on risk factors is available in Section 9 (Glossary for Volume 3).

## Specific risk factors

U2U services with relevant characteristics should take account in their risk assessment.

<input type="checkbox"/>	<p><b>3b</b> Services where users can form user groups or send group messages</p>	<ul style="list-style-type: none"> <li>• <b>Risk factors:</b> User groups</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content as well as suicide and self-harm content</li> </ul> <p>User groups can enable users to create communities in which CHC is shared and encountered by children. Our evidence shows that dedicated user groups are a key space in which pro-eating disorder communities can be formed and where harmful behaviours are encouraged. Children with lived experience of eating disorders, or who may be vulnerable to eating disorder content, are particularly likely to seek out eating disorder content through such groups. These groups can also act as spaces where users encourage others to seek support for suicide and self-harm, but also encourage others to engage in harmful behaviours. User groups dedicated to sharing suicide and self-harm content are sometimes reported to be 'self-regulating'<sup>52</sup>, with little perceived outside moderation and therefore it is perceived to be easier to find or encounter CHC on them.</p> <ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Group messaging</li> <li>• <b>Key kinds of CHC*:</b> violent content, eating disorder content, pornographic content, and bullying content, and content which is abusive or incites hatred</li> </ul> <p>Group messaging can allow CHC to be shared with multiple children at once in a more closed setting. Similar to user groups, children can find a sense of community in these spaces that may play a role in encouraging eating disorder content. They can also act as spaces where children are targeted or witness the sharing of bullying content. Children can sometimes be added to often large group chats without giving permission or with users who they do not know who can share pornographic and violent content unexpectedly. This content can sometimes be more extreme in nature than content shared in open channels.</p>
<h3>4. User communication factors</h3>		
<input type="checkbox"/>	<p><b>4a</b> Services with livestreaming</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Livestreaming</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to suicide and self-harm content</li> </ul> <p>Livestreaming can allow CHC to be shared in real-time, which may be challenging to moderate. Our evidence shows that livestreaming can be used to share suicide and self-injury content that children can be exposed to. Livestreaming can intersect with <u>group messaging</u> (see 3b) and <u>commenting</u> (see 4c) functionalities to increase the risk of harm. While some users may use these messages or comments to express sympathy or coordinate help within the livestream, some can encourage suicide or serious self-harm.</p>
<input type="checkbox"/>	<p><b>4b</b> Services with direct messaging</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Direct messaging</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to pornographic content and bullying content</li> </ul> <p>Direct messaging can allow users to share CHC in a closed and more targeted manner. While direct messaging can enable users to protect their privacy, our evidence shows direct messaging can enable bullying content behaviours, particularly between two users, that are more likely to go unnoticed by others. This risk may increase when users are able to message other users without the recipient's permission. Children can also receive direct messages containing pornographic content, often in the form of <u>hyperlinks</u> and frequently by users they do not know or suspect to be 'bots.'<sup>53</sup></p>

<sup>52</sup> These spaces are likely to be community moderated.

<sup>53</sup> We describe 'bots' as an umbrella term that refers to a software application or automated tool that has been programmed by a person to carry out a specific or predefined task without any human intervention. Further information on risk factors is available in Section 9 (Glossary for Volume 3).

## Specific risk factors

U2U services with relevant characteristics should take account in their risk assessment.

<input type="checkbox"/>	<p><b>4c</b> Services that enable commenting on content</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Commenting on content</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content, suicide and self-harm content, content which is abusive or incites hatred, and bullying content</li> </ul> <p>Commenting on content can allow users to target or encourage children who share CHC. For instance, hateful content is often found in comments that can be encountered by children. Our evidence shows that children can be subjected to bullying content in the comments on posts they share, particularly when users can comment on content <u>anonymously</u> (see 2b). Harmful conversations that encourage eating disorder content can also take place in comments, which can cause children to further engage with this content and contribute to users contacting them in order to share more of such content due to the public visibility of their comments.</p>
<input type="checkbox"/>	<p><b>4d</b> Services that enable posting images and videos</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Posting images and videos</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to suicide and self-harm content, violent content, eating disorder content, pornographic content, harmful substances content as well as dangerous stunts and challenges content</li> </ul> <p>Posting images or videos can allow CHC to be shared in more public settings with many users, including children. Online challenges and violent content are often posted in videos which have the potential to reach large audiences of children. This is also true of images depicting bodies which may be 'aspirational' to children with an eating disorder, particularly when posted from accounts with many <u>user connections</u> (see 3a) that can reach a large network of users. The ability to post images and videos ephemerally can also increase the risk of children sharing and encountering pornography and more extreme forms of violent content due to the perception that the content will be harder to moderate.</p>
<input type="checkbox"/>	<p><b>4e</b> Services that enable re-posting or forwarding content</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Re-posting or forwarding content</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to bullying content as well as suicide and self-harm content</li> </ul> <p>Re-posting or forwarding content can allow CHC to be shared with a larger audience than it was originally shared with, often without the permission of the children that are featured in or targeted by this content, such as bullying content. Engagement through re-posting and reacting to content such as suicide and self-harm content can also be perceived an indication of validation from other users on a service which could encourage the further sharing of CHC. This can be especially true when users who have a large number of <u>user connections</u> (see 3a) re-post or react to CHC posted by a child.</p>

## Specific risk factors

U2U services with relevant characteristics should take account in their risk assessment.

### 5. Content exploring factors

<input type="checkbox"/>	<p><b>5a</b> Services where users can search for user-generated content</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> User-generated content searching</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content, suicide and self-harm content, and pornographic content</li> </ul> <p>The ability to search for user-generated content within services may allow children to find CHC on your service. For example, our evidence shows that children can make searches using code words to bypass content bans and support prompts in order to access eating disorder content. This may be more common among children with experience of eating disorders. Children may also make searches using hashtags (see <a href="#">content tagging</a>) that are associated with CHC such as suicide and self-harm content.</p>
<input type="checkbox"/>	<p><b>5b</b> Services where users can tag content</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Content tagging</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to eating disorder content, suicide and self-harm content, harmful substances content, as well as dangerous stunts and challenges content</li> </ul> <p>Content tagging can improve the discoverability of CHC and therefore make it more likely that such content will be encountered by children. For instance, content tagging can be used to direct users, including children, to content promoting the ingestion of harmful substances as well as dangerous stunts and challenges by using certain hashtags.</p> <p>Our evidence also shows that users can create coded hashtags to obscure or disguise eating disorder content as well as suicide and self-harm content in an attempt to evade content moderation practices. These hashtags can sometimes be used to disguise harmful content as recovery content or can appear alongside seemingly harmless hashtags, which can result in children encountering this content unexpectedly. There is also a risk of this content being mis-labelled by <a href="#">content recommender systems</a> (see 6) as a result and disseminated to other users.</p>

### 7. Recommender systems

<input type="checkbox"/>	<p><b>6</b> Services with content recommender systems</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Content recommender systems</li> <li>• <b>Key kinds of CHC*:</b> Your service is likely to have an increased risk of harm related to violent content, eating disorder content, suicide and self-harm content, pornographic content, content which is abusive or incites hatred, as well as dangerous stunts and challenges content</li> </ul> <p>Content recommender systems curate personalised content recommendations for users based on their profile or personal characteristics (e.g. age, location, gender) and their engagement patterns (e.g., viewing habits, reactions, re-posts, comments). There is a risk of recommender systems amplifying CHC to a wide set of users, including children, who may otherwise not organically or intentionally come across this content.</p> <p>Our evidence indicates that content recommendation systems that are primarily optimised for user engagement can suggest CHC, such as violent content, to children without them actively seeking this content out. This risk is particularly pronounced when users create misleading <a href="#">content tags</a> (see 5b) or keywords, such as hashtags that have been associated with CHC. Children can also be exposed to CHC after engaging with thematically similar content. For instance, they may be recommended eating disorder content after engaging with content relating to dieting or body image.</p> <p>Children that have repeatedly engaged with content harmful to children can be recommended more of it with fewer alternative types of content, thereby increasing the risk of cumulative harm. Our evidence also indicates that in some cases children can over time be recommended harmful content that is associated with more severe impacts. For example, evidence reports children being presented with pornographic content depicting themes of violence after having engaged with pornographic content.</p>
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## Specific risk factors

U2U services with relevant characteristics should take account in their risk assessment.

### 8. Other features

<input type="checkbox"/>	<p>7 Services with features that increase engagement</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Functionalities and other features that increase engagement</li> <li>• <b>Key kinds of CHC*:</b> All kinds of content harmful to children</li> </ul> <p>Some functionalities and other features of a service affect how much users, including children, use the service. <b>We have found that certain functionalities and other features on U2U services can cause children to spend more time using a service, and that high usage of online services increases the risk of children encountering CHC.</b> The risk of cumulative harm is also heightened by high usage. We therefore consider these functionalities and features to increase the likelihood of encountering all kinds of CHC:</p> <ul style="list-style-type: none"> <li>- <b>Affirmation-based functionalities</b> such as the ability to <u>react to content</u> (eg. 'likes') and <u>comment on content</u> (see 4c) can provide children with quantifiable affirmation from the engagement of other users. <u>User connections</u> (see 3a) can also play a role, as children may be incentivised to build a large network of connections due to the perception of popularity associated with this. This engagement or perceived popularity can be understood as social affirmation and act as a reward that causes users, including children, to use a service more often.</li> <li>- <b>Alerts and notifications</b> can result in children accessing online services more often by prompting them to check activities they were notified of or reminding them they have not visited the service recently. Alerts and notifications can also intersect with affirmation-based functionalities by signalling to children when they have received engagement from others, which can re-enforce service use.</li> <li>- <b>Infinite scrolling and auto-play features</b> can prevent interruptions or prompts to end the consumption of online content. Users can often scroll through seemingly endless content feeds where videos play automatically, making it more challenging to disengage and therefore increasing time spent on a service. These feeds are also typically curated by <u>content recommender systems</u> (see 6) which show content that is most likely to be engaging to that user, further increasing the likelihood that children spend more time on the service.</li> </ul>
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## General risk factors

All U2U services should take account in their risk assessment.

<input checked="" type="checkbox"/>	<p>All U2U services</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> User base age</li> </ul> <p>The age of children on a service is one of the many demographic factors affecting the risk of harm related to CHC. <b>However, we have found evidence which suggests that children in different age groups face some distinct risks online based on the developmental stages they may be in.</b> We expect services to consider the age-related risks posed to children and suggest that they do so in relation to the following age groups:<sup>54</sup></p> <ul style="list-style-type: none"> <li>- <b>Children of 0-5 years</b> are undergoing rapid development and have typically begun using online services with parental supervision. Children of this age can still encounter CHC, particularly when unsupervised or when using the devices and accounts of family members.</li> <li>- <b>Children of 6-9 years</b> are increasingly going online and becoming more independent, with parents often creating rules to manage their children's online experiences. It is more common for children of this age to encounter CHC such as pornographic content than those in other age groups and incidents of exposure can have lasting impacts.</li> <li>- <b>Children of 10-12 years</b> are in a period of transition in which they often gain more independence and socialise more online, typically under less active parental supervision. This creates an increased risk of harmful interactions such as bullying content.</li> <li>- <b>Children of 13-15 years</b> are using online services more often and increased risk-taking tendencies see some actively seeking out CHC such as pornographic content. The onset of mental health challenges is more common for children of this age than</li> </ul>
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<sup>54</sup> We recognise that services will likely have different levels of understanding, evidence and data about the age of their users. See the 'Consider children in different age groups' sub-section for more detail. However, we still expect them to consider the risk of harm to children in different age groups that they have reason to believe may be accessing the service, regardless of whether or not they intend all those age groups to do so.

## General risk factors

All U2U services should take account in their risk assessment.

		<p>other age groups, heightening the impact of CHC such as content promoting suicide and self-harm.</p> <ul style="list-style-type: none"> <li>- <b>Children of 16-17 years</b> are typically more expressive online which coincides with new rights and freedoms as well as often being unsupervised online. Children in this age group may be more likely to engage in certain behaviours that can increase their risk of encountering harmful content such as livestreaming and creating adult profiles.</li> </ul>
<input checked="" type="checkbox"/>	<p>All U2U services</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Other user base demographics</li> </ul> <p>The demographics of children using your service (including users’ protected characteristics, media literacy levels, and mental health) will influence the risk of harm related to all kinds of CHC. <b>Overall, we have found that vulnerable child users (particularly children with multiple protected characteristics and existing mental health conditions) are more likely to experience harm from CHC and are impacted differently by it.</b> For example, we expect you to consider:</p> <ul style="list-style-type: none"> <li>- How the <b>gender</b> of users affects your assessment of risk – girls are more likely to encounter and are disproportionately impacted by various kinds of CHC such as eating disorder content, content which is abusive or incites hatred, bullying content, and suicide and self-harm content. Whereas boys are more likely to encounter and engage with pornographic content as well as dangerous stunts and challenges content.</li> <li>- How users with protected characteristics (including <b>race (including ethnicity), sexuality, sexual identity, religion, and disability</b>) affects your assessment of risk, including the risk of harm to users with <b>multiple protected characteristics</b>.</li> </ul> <p>These dynamics are highly complex and context-specific, and evidence is provided in the Children’s Register on user base demographics for each kind of CHC (see Volume 3). This can help you assess this risk factor even if you do not have any service-specific information on the make-up of your user base.</p>
<input checked="" type="checkbox"/>	<p>All U2U services</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Business model (revenue model and growth strategy)</li> </ul> <p>Your <u>revenue model</u> may increase the risk that children encounter different kinds of CHC on your service. For example, we expect you to consider:</p> <ul style="list-style-type: none"> <li>- How the <b>design of your service to optimise your revenue</b> may influence risk. For instance, to maximise engagement and therefore revenue, recommender systems on your service may suggest to children content that can be engaging but harmful (such as violent content). Or your service design may minimise ‘friction’ when sharing that content to increase engagement and therefore revenue.</li> <li>- How a focus on revenue maximisation could limit the effectiveness of <b>systems and processes</b> to protect children. For instance, services may be discouraged from adopting content moderation practices that could reduce children’s exposure to CHC but also potentially reduce engagement (and in turn, revenue).</li> <li>- How features directly related to how a service generates revenue may increase the risk that children encounter CHC. For instance, CHC that is <b>‘boosted’</b><sup>55</sup> may be promoted to children. Or <b>paid-for-ads</b><sup>56</sup> related to CHC (such as adverts for pornographic content) may increase the risk that children subsequently search for related user-generated content on the service.</li> </ul> <p>Your <u>growth strategy</u><sup>57</sup> may increase the risk that children encounter different kinds of CHC on your service. For instance, we would expect you to consider how a focus on growth could incentivise you to prioritise the use of your financial resources for activities aimed at growing your business (e.g. marketing campaigns, R&amp;D activities) rather than for <b>systems and processes to protect children</b>. We would also expect you to consider how growing your service through implementing new technologies and offerings, particularly <b>emerging</b></p>

<sup>55</sup> Where users pay services to give prominence to their content.

<sup>56</sup> For instance, display advertisements posted by companies. While such paid-for-advertisements are not in scope of the Act, they are considered here by virtue of being a vector to user-generated CHC.

<sup>57</sup> We describe ‘growth strategy’ as how the service plans to expand its business. For example, through the adoption of emerging technologies. Further information on risk factors is available in Section 9 (Glossary for Volume 3).

General risk factors		
All U2U services should take account in their risk assessment.		
		<b>technologies</b> (e.g. Generative AI), of which children are often early adopters, may attract children to your service.
<input checked="" type="checkbox"/>	All U2U services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Commercial profile<sup>58</sup></li> </ul> <p>Your <u>commercial profile</u> may increase the risk that children encounter different kinds of CHC. For example, we would expect you to consider:</p> <ul style="list-style-type: none"> <li>- How <b>low capacity</b> or <b>early-stage</b> businesses may pose heightened risk if they have more limited technical skills and financial resources to introduce effective risk management. For instance, they may have insufficient resources to adopt technically advanced automated content moderation processes, or to hire a large number of paid-for moderators.</li> <li>- How a <b>fast-growing</b> user base may negatively affect risk management, given the increased scale and sophistication of the moderation technologies and processes required to keep track of CHC (particularly since the sources of risk can change quickly as the user base develops).</li> </ul>
* See Table 7.1 of Section 7, Volume 3 (Introduction to the Children’s Register of Risks) for more detail on how different kinds of CHC have been grouped.		

## Search Risk Profile and risk factors

A1.14 The Ofcom Search Risk Profile for content that is harmful to children (‘Children’s Search Risk Profile’) is presented in Table A1.2. Each row represents a unique risk factor that services should consider when conducting their children’s risk assessment. The information provided on the risk factors is based on the evidence in the Children’s Register.

A1.15 When consulting the table, services should do the following:

- **First**, answer the ‘Yes’ / ‘No’ questions in Figure 4 below about the characteristics of your service;<sup>59</sup>
- **Second**, use your answers to select which **specific risk factors** from Table 9 apply to you. Each ‘Yes’ answer corresponds to a risk factor you will need to take into account in your children’s risk assessment. For example, if you answered ‘Yes’ to questions 1a, 2, and 3b then you should select those three risk factors from the table. A Glossary is available to help you interpret your risk factors accurately;<sup>60</sup>
- **Third**, review the four **general risk factors** (user base age, other user base demographics, revenue model and commercial profile) at the bottom of the table. These apply to all services, and you will need to take account of each in your risk assessment.

<sup>58</sup> We use ‘commercial profile’ to refer to the size of the service in terms of capacity, the stage of service maturity, and the rate of growth in relation to users and/or revenue. Further information on risk factors is available in Section 9 (Glossary for Volume 3).

<sup>59</sup> If your service offers multiple versions – e.g. mobile and web – you should select ‘Y’ if *any* version of the service has the relevant characteristic(s). However, this only applies where versions are similar enough to be treated as a single service.

<sup>60</sup> If, after consulting the Glossary for Volume 3, you are still unsure if the risk factor applies to you, we would suggest you read the corresponding information provided about that risk factor in Table A1.1 and consider if this information is relevant to your service. You may also wish to consult Section 7.10 (Risk of harm to children on search services) for more detailed information on the corresponding risk factor or kind of CHC.

A1.16 After you have taken these three steps, you should have the list of risk factors you will need to take account of when conducting your own children’s risk assessment. This list includes any specific risk factors you have selected, plus all three of the general risk factors.

6.20 Step 2 of the Children’s Risk Assessment Guidance provides details on how to use this list of risk factors as part of your children’s risk assessment. At Step 2, you will also consider how the risk factors you have selected affect your service (e.g. you have considered if this is a risk that you are already managing, or one that you may need to address through a set of mitigations to help reduce the risk of harm to children).

**Figure A1.2. Questions for identifying your risk factors.**

Select Yes (Y) or No (N) for the following questions about your Search service.	
<b>1. Is my service any of the following service types? Select all that apply:</b> a. General search service b. Vertical search service	Y / N Y / N
<b>2. Does my service have any of the following functionalities? Select all that apply:</b> a. Provide users with search predictions or suggestions b. Allows users to search for photographs, videos or visual images	Y / N Y / N

**Table A1.2. Search risk factors (Children’s Search Risk Profile).**

Specific risk factors	
Search services with relevant characteristics should take account in their risk assessment.	
1. Service type factors	
<input type="checkbox"/>	<p style="text-align: center;"><b>1a</b> General search services</p> <ul style="list-style-type: none"> <li><b>Risk factor:</b> General search services</li> </ul> <p><u>General search services</u> are the starting point of many users’ online journeys and play a crucial role in making content accessible. General search services present users, including children, with access to webpages from across the entire clear web. We would expect you to consider how this may provide a means for children to locate and access various types of content that may be considered harmful to children; either deliberately by entering search requests relating to such content or unintentionally (for instance, through predictive search functions). For instance, search services have been identified as one of the most common ways that children find pornographic content online. There is also evidence showing that users searching for suicide, self-injury and eating disorder content can be presented with large volumes of such content, often high up in the search results.</p> <p>Additionally, content that appears in search results can depend on the services’ underlying search index and their ranking algorithms. You should assess how this ranking can act as a pathway for children to encounter CHC in the absence of appropriate mitigations.</p>
<input type="checkbox"/>	<ul style="list-style-type: none"> <li><b>Risk factor:</b> Vertical search services</li> </ul> <p>Vertical search services, sometimes known as specialty search engines, serve narrower results compared to general search services. For example, they draw results from pre-determined websites that contain professional or curated content, rather than indexing sites from across the clear web. If your service is a vertical search service, you should be aware that children may still encounter CHC, but your service may be less likely to present CHC to child users compared to general search services.</p>

## Specific risk factors

Search services with relevant characteristics should take account in their risk assessment.

### 2. Functionality factors

<input type="checkbox"/>	<p><b>2a</b> Services with search predictions or suggestions</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Predictive or suggestive search</li> </ul> <p>If your service has functionalities that predict or makes search suggestions, we expect you to consider how these functionalities may provide search suggestions that lead children towards harmful results.</p> <p>While these functionalities can allow searches to be more helpful and time-saving, our evidence indicates that search request predictions have the potential to help users, including children, find content which may be considered harmful to children. They can also present users with suggested search requests that may be harmful in their own right, such as racist or hateful search requests. This can result from search requests that are initially innocuous.</p>
<input type="checkbox"/>	<p><b>2b</b> Services with image or video search</p>	<ul style="list-style-type: none"> <li>• <b>Risk factors:</b> Image or video search</li> </ul> <p>If your service allows image or video-based search results, we expect you to consider the increased risk of harm to individuals by providing a means for children to find and access image and video-based CHC. For instance, image results can be more likely to contain content that is harmful to children such as content promoting self-injurious behaviour and this content can be directly viewed by the user on the search service without the need to click through.</p>

## General risk factors

All Search services should take account in their risk assessment.

<input checked="" type="checkbox"/>	<p>All search services</p>	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> User base age</li> </ul> <p>The age of children on a service is one of the many demographic factors affecting the risk of harm related to CHC. <b>However, we have found evidence which suggests that children in different age groups face some distinct risks online based on the developmental stages they may be in.</b> We expect services to consider the age-related risks posed to children and suggest that they do so in relation to the following age groups:<sup>61</sup></p> <ul style="list-style-type: none"> <li>- <b>Children of 0-5 years</b> are undergoing rapid development and have typically begun using online services with parental supervision. Children of this age can still encounter CHC, particularly when unsupervised or when using the devices and accounts of family members.</li> <li>- <b>Children of 6-9 years</b> are increasingly going online and becoming more independent, with parents often creating rules to manage their children's online experiences. It is more common for children of this age to encounter CHC such as pornographic content than those in other age groups and incidents of exposure can have lasting impacts.</li> <li>- <b>Children of 10-12 years</b> are in a period of transition in which they often gain more independence and socialise more online, typically under less active parental supervision. This creates an increased risk of harmful interactions such as bullying content.<sup>62</sup></li> <li>- <b>Children of 13-15 years</b> are using online services more often and increased risk-taking tendencies see some actively seeking out CHC such as pornographic content. The onset of mental health challenges is more</li> </ul>
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<sup>61</sup> We recognise that services will likely have different levels of understanding, evidence and data about the age of their users. See the 'Consider children in different age groups' sub-section for more detail. However, we still expect services to consider the risk of harm to children in different age groups that they have reason to believe may be accessing the service, regardless of whether or not they intend all those age groups to do so.

<sup>62</sup> It is likely that such interactions are occurring on U2U services. However, search services may still play a role in encountering this content.

		<p>common for children of this age than other age groups, heightening the impact of CHC such as content promoting suicide and self-harm.</p> <ul style="list-style-type: none"> <li>- <b>Children of 16-17 years</b> are typically more expressive online which coincides with new rights and freedoms as well as often being unsupervised online. Children in this age group may be more likely to engage in certain behaviours that can increase their risk of encountering harmful content such as livestreaming and creating adult profiles.</li> </ul>
<input checked="" type="checkbox"/>	All search services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Other user base demographics</li> </ul> <p>The demographics of children using your service (including users' protected characteristics, media literacy levels, and mental health) may influence the risk of harm related to all kinds of CHC. <b>Overall, we have found that vulnerable child users (particularly children with multiple protected characteristics and existing mental health conditions) are more likely to experience harm from CHC and are impacted differently by it.</b> We would expect you to consider these dynamics when you assess the risk of each type of CHC.</p> <p>These dynamics are highly complex and context-specific, and evidence is provided in the Children's Register on user base demographics for each kind of CHC (see Volume 3). This can help you assess this risk factor even if you do not have any service-specific information on the make-up of your user base.</p>
<input checked="" type="checkbox"/>	All search services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Business model (revenue model and growth strategy)</li> </ul> <p>We would expect you to consider if and how your <u>revenue model</u> may increase the risk that children encounter different kinds of CHC on your service.<sup>63</sup></p> <p>Your <u>growth strategy</u> may also increase risk. For instance, we would expect you to consider how the <b>development of an expansive search index</b> may influence risk, if not accompanied by appropriate <b>systems and processes</b> that ensure indexed webpages containing CHC are not returned in the search results for child users.</p>
<input checked="" type="checkbox"/>	All search services	<ul style="list-style-type: none"> <li>• <b>Risk factor:</b> Commercial profile</li> </ul> <p>Your commercial profile may affect the likelihood that children encounter CHC. For example, we expect you to consider how <b>low capacity services</b><sup>64</sup> and <b>early-stage services</b><sup>65</sup> may have limited capacity/resources to develop effective processes (such as technically advanced moderation processes) to minimise the likelihood of children encountering CHC.</p>

<sup>63</sup> While general search services typically generate revenue using an advertising-based model and there is a risk that advertising could be used to promote CHC, there is very limited evidence demonstrating any direct link between different revenue models and the presence of content that is harmful to children in search results. We nevertheless encourage Search services to consider any links between their revenue model and increased risks for children.

<sup>64</sup> In terms of number of employees or revenues.

<sup>65</sup> Search services that are start-ups or at an early growth stage.

# A2. Comparison of children’s and illegal harms risk assessment duties

**Table A2.1 Comparison of the illegal harms risk assessment duties and the children’s risk assessment duties- User to User services**

For user-to-user services, the Illegal Content Risk Assessment duties can be found in Part 2, Chapter 2, section 9 and the Children’s Risk Assessment duties are under Part 2, Chapter 2, section 11.

Illegal Content Risk Assessment duties Section 9 - User to User Services	Children’s risk assessment duties Section 11 – User to User
(1) This section sets out the duties about risk assessments which apply in relation to all regulated user-to-user services	(1) This section sets out the duties about risk assessments which apply in relation to regulated user-to-user services that are likely to be accessed by children (in addition to the duties about risk assessments set out in section 9 and, in the case of services likely to be accessed by children which are Category 1 services, the duties about assessments set out in section 14).
(2) A duty to carry out a suitable and sufficient illegal content risk assessment at a time set out in, or as provided by, Schedule 3.	(2) A duty to carry out a suitable and sufficient children’s risk assessment at a time set out in, or as provided by, Schedule 3.
(3) A duty to take appropriate steps to keep an illegal content risk assessment up to date, including when OFCOM make any significant change to a risk profile that relates to services of the kind in question.	(3) A duty to take appropriate steps to keep a children’s risk assessment up to date, including when OFCOM make any significant change to a risk profile that relates to services of the kind in question.
(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient illegal content risk assessment relating to the impacts of that proposed change.	(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient children’s risk assessment relating to the impacts of that proposed change.

## Illegal Content Risk Assessment duties

### Section 9 - User to User Services

## Children's risk assessment duties

### Section 11 – User to User

(5) An “illegal content risk assessment” of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind—

(a) the user base;

(b) the level of risk of individuals who are users of the service encountering the following by means of the service—

(i) each kind of priority illegal content (with each kind separately assessed), and

(ii) other illegal content,

taking into account (in particular) algorithms used by the service, and how easily, quickly and widely content may be disseminated by means of the service;

(c) the level of risk of the service being used for the commission or facilitation of a priority offence;

(5) Where a children's risk assessment of a service identifies the presence of non-designated content that is harmful to children, a duty to notify OFCOM of—

(a) the kinds of such content identified, and

(b) the incidence of those kinds of content on the service.

(6) A “children's risk assessment” of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind—

(a) the user base, including the number of users who are children in different age groups;

(b) the level of risk of children who are users of the service encountering the following by means of the service—

(i) each kind of primary priority content that is harmful to children (with each kind separately assessed),

(ii) each kind of priority content that is harmful to children (with each kind separately assessed), and

(iii) non-designated content that is harmful to children, giving separate consideration to children in different age groups, and taking into account (in particular) algorithms used by the service and how easily, quickly and widely content may be disseminated by means of the service;

(c) the level of risk of harm to children presented by different kinds of content that is harmful to children, giving separate consideration to children in different age groups;



## Illegal Content Risk Assessment duties

### Section 9 - User to User Services

(d) the level of risk of harm to individuals presented by illegal content of different kinds or by the use of the service for the commission or facilitation of a priority offence;

(e) the level of risk of functionalities of the service facilitating the presence or dissemination of illegal content or the use of the service for the commission or facilitation of a priority offence, identifying and assessing those functionalities that present higher levels of risk;

(f) the different ways in which the service is used, and the impact of such use on the level of risk of harm that might be suffered by individuals;

(g) the nature, and severity, of the harm that might be suffered by individuals from the matters identified in accordance with paragraphs (b) to (f);

(h) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.

(6) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to individuals presented by illegal content.

## Children's risk assessment duties

### Section 11 – User to User

(d) the level of risk of harm to children presented by content that is harmful to children which particularly affects individuals with a certain characteristic or members of a certain group;

(e) the extent to which the design of the service, in particular its functionalities, affects the level of risk of harm that might be suffered by children, identifying and assessing those functionalities that present higher levels of risk, including functionalities—

(i) enabling adults to search for other users of the service (including children), or

(ii) enabling adults to contact other users (including children) by means of the service;

(f) the different ways in which the service is used, including functionalities or other features of the service that affect how much children use the service (for example a feature that enables content to play automatically), and the impact of such use on the level of risk of harm that might be suffered by children;

(g) the nature, and severity, of the harm that might be suffered by children from the matters identified in accordance with paragraphs (b) to (f), giving separate consideration to children in different age groups;

(h) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.

(7) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to children presented by content that is harmful to children.

**Illegal Content Risk Assessment duties**  
**Section 9 - User to User Services**

**Children's risk assessment duties**  
**Section 11 – User to User**

(7) See also—

(a) section 23(2) and (10) (records of risk assessments), and

(b) Schedule 3 (timing of providers' assessments).

(8) See also—

(a) section 23(2) and (10) (records of risk assessments), and

(b) Schedule 3 (timing of providers' assessments).

**Table A2.2 Comparison of the illegal harms risk assessment duties and the children’s risk assessment duties- Search services**

For search services, the Illegal Content Risk Assessment duties can be found under Part 2, Chapter 3, section 26 and the Children’s Risk Assessment duties are under Part 2, Chapter 2, section 28.

**Illegal Content Risk Assessment duties**

**Section 26 - Search services**

**Children’s risk assessment duties**

**Section 28 – Search Services**

<p>(1) This section sets out the duties about risk assessments which apply in relation to all regulated search services.</p>	<p>(1) This section sets out the duties about risk assessments which apply in relation to regulated search services that are likely to be accessed by children (in addition to the duties about risk assessments set out in section 26).</p>
<p>(2) A duty to carry out a suitable and sufficient illegal content risk assessment at a time set out in, or as provided by, Schedule 3.</p>	<p>(2) A duty to carry out a suitable and sufficient children’s risk assessment at a time set out in, or as provided by, Schedule 3.</p>
<p>(3) A duty to take appropriate steps to keep an illegal content risk assessment up to date, including when OFCOM make any significant change to a risk profile that relates to services of the kind in question.</p>	<p>(3) A duty to take appropriate steps to keep a children’s risk assessment up to date, including when OFCOM make any significant change to a risk profile that relates to services of the kind in question.</p>
<p>(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient illegal content risk assessment relating to the impacts of that proposed change.</p>	<p>(4) Before making any significant change to any aspect of a service’s design or operation, a duty to carry out a further suitable and sufficient children’s risk assessment relating to the impacts of that proposed change.</p>
<p>(5) An “illegal content risk assessment” of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind—</p>	<p>(5) A “children’s risk assessment” of a service of a particular kind means an assessment of the following matters, taking into account the risk profile that relates to services of that kind—</p>

## Illegal Content Risk Assessment duties

### Section 26 - Search services

(a) the level of risk of individuals who are users of the service encountering search content of the following kinds—

(i) each kind of priority illegal content (with each kind separately assessed), and

(ii) other illegal content,

taking into account (in particular) risks presented by algorithms used by the service, and the way that the service indexes, organises and presents search results;

(b) the level of risk of functionalities of the service facilitating individuals encountering search content that is illegal content, identifying and assessing those functionalities that present higher levels of risk;

(c) the nature, and severity, of the harm that might be suffered by individuals from the matters identified in accordance with paragraphs (a) and (b);

(d) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.

## Children's risk assessment duties

### Section 28 – Search Services

(a) the level of risk of children who are users of the service encountering search content of the following kinds—

(i) each kind of primary priority content that is harmful to children (with each kind separately assessed),

(ii) each kind of priority content that is harmful to children (with each kind separately assessed), and

(iii) non-designated content that is harmful to children,

giving separate consideration to children in different age groups, and taking into account (in particular) risks presented by algorithms used by the service and the way that the service indexes, organises and presents search results;

(b) the level of risk of children who are users of the service encountering search content that is harmful to children which particularly affects individuals with a certain characteristic or members of a certain group;

(c) the extent to which the design of the service, in particular its functionalities, affects the level of risk of harm that might be suffered by children, identifying and assessing those functionalities that present higher levels of risk, including a functionality that makes suggestions relating to users' search requests (predictive search functionality);

(d) the different ways in which the service is used, including functionalities or other features of the service that affect how much children use the service, and the impact of such use on the level of risk of harm that might be suffered by children;

## Illegal Content Risk Assessment duties

### Section 26 - Search services

## Children's risk assessment duties

### Section 28 – Search Services

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	<p>(e) the nature, and severity, of the harm that might be suffered by children from the matters identified in accordance with paragraphs (a) to (d), giving separate consideration to children in different age groups;</p>
	<p>(f) how the design and operation of the service (including the business model, governance, use of proactive technology, measures to promote users' media literacy and safe use of the service, and other systems and processes) may reduce or increase the risks identified.</p>
<p>(6) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to individuals presented by illegal content.</p>	<p>(6) In this section references to risk profiles are to the risk profiles for the time being published under section 98 which relate to the risk of harm to children presented by content that is harmful to children.</p>
<p>(7) See also—</p> <p>(a) section 34(2) and (9) (records of risk assessments), and</p> <p>(b) Schedule 3 (timing of providers' assessments).</p>	<p>(7) See also—</p> <p>(a) section 34(2) and (9) (records of risk assessments), and</p> <p>(b) Schedule 3 (timing of providers' assessments).</p>