



# Risk Assessment under the UK Online Safety Act: State of play and next steps

**Silvia Fukuoka**

Head of Governance and Risk Management Strategy and Standards

2 June 2025



# Key duties: risk assessment and safety duty

## Risk Assessment duties

- Risk assessment for illegal content
- Risk assessment content harmful to children

## Safety duties

- Codes of Practice for illegal content
- Codes of Practice for content harmful to children

RA  
Guidance

Codes of  
Practice

17 kinds of priority illegal content + other illegal content

Content harmful to children

# Services must do a 'suitable and sufficient' risk assessment

- Do an **Illegal content risk assessment** and keep a record, per service (in force)
- Do a **Children's risk assessment** and keep a record, per service, if accessed by children (by 24 July)
- **'Suitable and sufficient'** criteria in the Act:
  - Specific to the service
  - Reflect risks accurately
  - Evidence to explain risk judgements
  - Consult Ofcom's **Risk Profiles**
- **Review** and **update** *at least* every year
- Triggers: **significant change** and change to Ofcom's **Risk Profiles**
- Publish summary if services is **categorised**
- Ofcom can **request** a risk assessment record at any time


# Duties require services to consider design and functionality risks

## Illegal RA duties

- ✓ Assess the risk of users **encountering** each of the **17 kinds of priority illegal content** and other illegal content, and the risk of a U2U service being used for the **commission or facilitation** of a priority offence;
- ✓ Take into account **Ofcom's Risk Profiles** (features and functionality risks associated with specific harms)
- ✓ Consider the **characteristics of the service** (user base, **functionalities**, algorithmic systems, business model)
- ✓ Consider **service design and operation** (including existing controls like governance, proactive tech, media literacy measures, other systems and processes)
- ✓ Consider how service is used – intended and unintended ways

## Children's RA duties

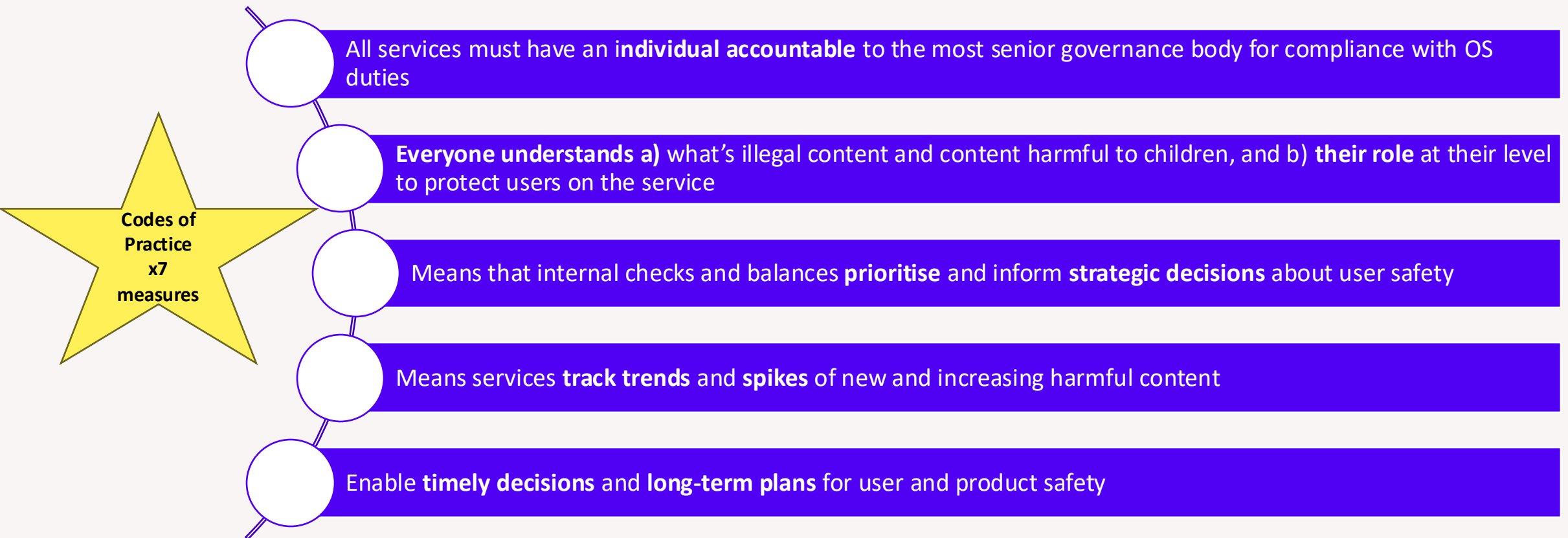
- ✓ Assess the risk of children **encountering** each kind of content harmful to children (**4** primary priority content, **8** priority content and **any NDC**)
- ✓ Take into account **Ofcom's Risk Profiles** (features and functionality risks associated with specific harms)
- ✓ Consider the **characteristics of the service** (user base – including numbers and age groups-, algorithmic systems, business model)
- ✓ Consider **functionalities** (*incl. enabling adults to search for or contact other users such as children*, algorithmic systems and how easily, quickly and widely they disseminate content)
- ✓ Consider **service design and operation** (including existing controls like governance, proactive tech, media literacy measures, other systems and processes)
- ✓ Consider how service is used – intended and unintended ways by children



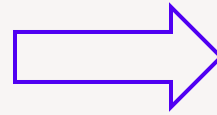
RA  
Guidance

# Governance measures - an accountability framework for user and product safety

- Risk assessments are part of a living process, not an administrative process
- Flexible and proportionate – sophisticated for large firms, streamlined for smaller firms



# Ofcom's Risk Profiles help services identify risky features and functionalities



Service type	User identification factors	User communication factors
Social media services	Services with user profiles	Services with livestreaming
Messaging services	Posting/sending content anonymously	Services with direct messaging
Gaming services		Services with encrypted messaging
Adult services	User networking factors	Services with commenting
Discussion forum services	Services with user connections	Services with posting images or videos
Marketplace and listing services	User groups or group messages	Services where users can post or send locations
File-storage and file-sharing services	Transaction and offers factors	Services with reposting or forwarding of content
	Posting goods and services for sale	
User base	Recommender systems	Content exploring factors
Child users	Content and/or network recommender systems	Users searching for user-generated content
U2U General		Services with hyperlinks
Demographics		
Business model		
Commercial profile		

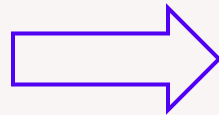
**Registers of Risks** are Ofcom's repository of evidence for OS risks of harm

Identify features and functionalities associated with each kind of harm, called 'risk factors'. These make up our **Risk Profiles**.

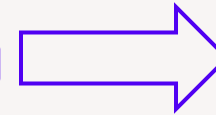


# Practical use of Risk Profiles for providers to identify risks relating to the design of services

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:		
a. Social media service (services which connect users and enable them to build communities around common interests or connections)	Y / N	
b. Messaging service (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. Gaming service (services which allow users to interact within partially or fully simulated virtual environments)	Y / N	
d. Adult service (services which are primarily used for the dissemination of user-generated adult content)	Y / N	
e. Discussion forum or chat room service (services which allow users to send or post messages that can be read by the public or an open group of people)	Y / N	
f. Marketplace or listing service (services which allow users to buy and sell their goods or services)	Y / N	
g. File-storage and file-sharing service (services whose primary functionalities involve enabling users to store digital content and share access to that content through links)	Y / N	
2. Do child users access some or all of my service? <sup>13</sup>	Y / N	
3. Does my service have any of the following functionalities related to how users identify themselves to one another? Select all that apply:		
a. Users can display identifying information through a user profile that can be viewed by others (e.g. images, usernames, age)	Y / N	
b. Users can share content anonymously (e.g. anonymous profiles or access without an account) <sup>14</sup>	Y / N	
4. Does my service have any of the following functionalities related to how users network with one another? Select all that apply:		
a. Users can connect with other users <sup>15</sup>	Y / N	
b. Users can form closed groups or send group messages	Y / N	
5. Does my service have any of the following functionalities that allow users to communicate with one another? Select all that apply:		
a. Livestreaming (either open or closed channels)	Y / N	
b. Direct messaging (including ephemeral direct messaging)	Y / N	
c. Encrypted messaging	Y / N	
d. Commenting on content	Y / N	
e. Posting or sending images or videos (either open or closed channels)	Y / N	
f. Posting or sending location information	Y / N	
g. Re-posting and forwarding content	Y / N	
6. Does my service allow users to post goods and services for sale? <sup>16</sup>	Y / N	
7. Does my service have any of the following functionalities that allow users to find or encounter content? Select all that apply:		
a. Searching for user-generated content	Y / N	
b. Hyperlinking	Y / N	
8. Does my service use content or network recommender systems?	Y / N	



Service type	User identification factors	User communication factors
Social media services	Services with user profiles	Services with livestreaming
Messaging services	Posting/sending content anonymously	Services with direct messaging
Gaming services	User networking factors	Services with encrypted messaging
Adult services	Services with user connections	Services with commenting
Discussion forum services	User groups or group messages	Services with posting images or videos
Marketplace and listing services	Transaction and offers factors	Services where users can post or send locations
File-storage and file-sharing services	Posting goods and services for sale	Services with reposting or forwarding of content
User base	Recommender systems	Content exploring factors
Child users	Content and/or network recommender systems	Users searching for user-generated content
U2U General		Services with hyperlinks
Demographics		
Business model		
Commercial profile		



Terrorism	1 2 3	Human trafficking	1 1 3
CSEA (+ sub types)	3	Unlawful immigration	1
Hate	1	Fraud and financial services	
Harassment, threats, stalking and abuse		Proceeds of crime	1
Controlling or coercive behaviour	3	Drugs and psychoactive substances	1
Intimate image abuse	1	Firearms, knives and other weapons	3
Extreme pornography offence		Encouraging or assisting suicide	
Sexual exploitation of adults		Foreign interference offence	
		Animal cruelty	1

Risk Profile **questionnaires** in guidance

To identify risks presented by **service design and characteristics**

And identify relevant **harms** to consider in their risk assessments

# Early observations from Illegal content records

- Good practices seen
- Risk management methodology
- Governance oversight
- Features and functionalities
- Risk levels for 17 kinds of priority illegal content and other illegal content
- Judgements about risk, supported by evidence



# Key reflections for next steps

- When is service design contributing to user safety?
- What evidence or data points will give us relative confidence of this?