



Working together
to stop child sexual
abuse online



SAFETY BY DESIGN CODE OF PRACTICE: PARLIAMENTARY BRIEFING NOTE

“Safety by design is not optional. It is the law.” Dame Melanie Dawes, Chief Executive of Ofcom

THE ISSUE

The Online Safety Act explicitly requires social media platforms and other regulated services to be “safe by design” (s. 1(3)). The Government, through the Secretary of State’s [Statement of Strategic Priorities](#), and [Ofcom’s own Chief Executive](#) say so plainly. Yet **Ofcom’s current codes of practice within the Online Safety Act do not define what safety by design actually means** nor set out how the social media platforms, messaging services and search engines need to implement it. **The codes focus primarily on ex-post measures, to be implemented after the harm has already happened, or user controls. They do not get at the harmful design choices, including features and functionalities, that drive or exacerbate so much of the harm online.**

The consequence of this gap, as evidenced in recent US court cases, is that the design of the social media platforms and other online services continue to prioritise profit over safety for all users, including children, from algorithms that amplify abuse and promote violent content, to features engineered to keep users scrolling for hours.

This is the gap the [Safety by Design Code of Practice](#) — co-produced by the Online Safety Act Network, 5Rights Foundation, Molly Rose Foundation, NSPCC, End Violence Against Women Coalition (EVAW), Glitch, Refuge, Internet Watch Foundation (IWF) and FlippGen, with the expert contribution of Prof Lorna Woods OBE, and supported by a further 35 leading online safety organisations — will close, demonstrating what good looks like for Ofcom to better enforce the Act’s primary objective.

This approach is backed by Parliamentarians - the Chair of the Science, Innovation and Technology Committee recently wrote to DSIT Ministers to recommend services should be “safe by design” for all users - and is overwhelmingly supported by the public. New polling has found that **84% of the UK public** think that requiring companies to prove their products are designed to be safe before use would keep everyone safe on social media platforms. **Only 2% think platforms are currently doing a good job of reducing the risk of harm to users.**

More detail is provided below. Please contact tallulah@onlinesafetyact.net to discuss further.

WHY THIS MATTERS NOW

- **The law already requires it.** Section 1(3) of the Online Safety Act mandates services to be safe by design, it is not being implemented or fully enforced.
- **Harm is a design choice, not an accident.** The algorithms - recommender systems - that push and amplify abuse and violent content, autoplay and infinite scroll, streaks, lootboxes and 'dark pattern' designs that manipulate users into making choices that benefit the platform, such as spending more time on the app or consenting to tracking. All of these are deliberate design choices that drive measurable harm - not just to children, but to women, minoritised groups, vulnerable adults. The intentional design choices of the platforms must be changed to prioritise safety and well-being rather than engagement and monetisation.
- **We must make users safe from the start, not tackle harm after it happens.** We have an opportunity through the government's current consultation to ensure that safety by design is central to how we better protect all users online. Regardless of what age someone starts using social media platforms or online services, we can ensure they are safe from the outset - tested and risk assessed as all other products are - so that harms are prevented at source.
- **Children, women and marginalised users are paying the price.** We don't let any other sector test risky or unsafe products on children - think toys, cars, household appliances, medicine - or other users, the same standards must apply to social media platforms and online services.
- **We need design-level action to keep children safe.** Age-gating and restricting access to certain products and functionalities won't address the fundamental issues with platforms that are built to maximise engagement at any cost. **Whatever the Government's final decision on age-related restrictions for children, we cannot assure their safety if platforms don't address the structural problems with their products. A ban or age-gating individual features will still leave over-16s, women, minority groups, vulnerable adults - in fact all adult users - at risk of preventable harm.**

THE ASKS

1. **Adopt the Safety by Design Code of Practice** as a central part of the framework for the Government's response to the social media consultation. [The code is here.](#)
2. **Direct Ofcom to include it alongside its other codes** covering illegal harms and the protection of children.
3. **Amend the OSA to clearly define what "safety by design" means** and ensure the adoption of the code happens. See below for this definition.

WHAT "SAFETY BY DESIGN" ACTUALLY MEANS

It is the same principle that brought us many existing product safety standards - toys, food, clothes, seatbelts: **the company designing and profiting from the product must build it to be safe from the start, rather than leaving users at risk of harm or expecting them to be responsible for keeping themselves safe.**

DESIGN OUT

If a product or feature creates risk, redesign or remove it.

MANAGE WHAT REMAINS

Use technical and policy safeguards for risks that can't be eliminated.

FIX HARM AS A LAST RESORT

Reporting, takedowns and redress — but never the first line of defence.

WHAT THE CODE DOES

- **Social media platforms safety tested before launch, not after harm** — with the people most affected by harm involved in the testing.
- **Children’s accounts are private by default** — with strangers unable to find or message them.
- **Addictive features turned off by default** — autoplay, infinite scroll, streaks, lootboxes, push alerts. They can be opted into where safe; they should not be the starting point.
- **A ban on ‘dark patterns’** — the manipulative design tricks that push users into choices they would not otherwise make.
- **Real accountability** — a named board-level person responsible for safety, with public reporting on what’s working and what isn’t.
- **Redress** - routes for people harmed by services, or activity on them, to seek action from companies.

WHAT THE PUBLIC EXPECT

A representative poll of UK adults conducted by YouGov on behalf of the Online Safety Act Network found:

- **84%** are convinced that requiring companies to prove their products are designed and tested to be safe before use would keep all users safe online - the same standard already applied to toys, food, household appliances, and most other products.
- **61%** agree that social media companies take little or no responsibility for designing products that are safe for users.
- **79%** believe we need comprehensive laws to regulate social media platforms because platform operators will otherwise prioritise their business interests over user safety.
- **62%** think that platforms would only take the necessary action if it did not impact their profits.
- **65%** say social media platforms and their leadership, not parents or individual users, should hold primary responsibility for ensuring their products are designed to be safe from the start, followed by the government.
- **Only 2%** think platforms are doing a good job of reducing the risk of harm to users.

About the polling: YouGov surveyed 2043 UK adults aged 18+ between 1st May and 12th May, 2026. Data weighted to be representative of the UK adult population. Full data tables available on request.

ADDITIONAL INFORMATION

We propose the following definition of safety by design should be inserted into the OSA: “For the purposes of this Act, a service is safe by design when it is designed and operated according to the following principles:

- (a) that protection from harm related to regulated content is taken into account through the entire lifecycle of the service and the functionalities making up the service, including the following stages: design, development, deployment, management, and retirement;
- (b) that protection from harm related to regulated content is taken into account across functionalities and features relating to the creation of accounts, the creation of content, the finding and curation of content, user engagement with content from other users, content moderation and appeals systems;

(c) that a service should seek first to reduce the risk of harm before seeking to mitigate and manage it, with remediation being the option of last resort.”

The Secretary of State for Science, Innovation and Technology made [Safety by Design](#) the first priority in their [Statement of Strategic Priorities \(SSP\) for Online Safety in 2025](#). The SSP sets out the framework for Ofcom’s work during this Parliament and states “When we discuss safety by design, we mean that regulated providers should look at all areas of their services and business models, including algorithms and functionalities, when considering how to protect all users online. They should focus not only on managing risks but embedding safety outcomes throughout the design and development of new features and functionalities, and consider how to make existing features safer. The government believes the goal should be to prevent harm from occurring in the first place, wherever possible ... We want to see services that are safe by design, where features are chosen and designed to limit the risk of harm to users. This should be a basic principle for operating in the UK market.”

The Science, Innovation and Technology Committee, [in a letter to the DSIT Secretary of State](#) published on May 15th in response to the consultation on children’s online safety, said the onus should be on “anyone marketing an information society service (such as a social media platform) to demonstrate that they meet strong consumer safety standards set by government in the same way they would have to for a toy or domestic appliance”. The Committee recommended that “Services should be safe by design for all users. Features that can cause behavioural addiction, such as infinite scrolling, should be designed out in social media and AI online services.”

A [major new report](#) from former ICO deputy commissioner Steve Wood, published on May 14th, on the impact of regulation on children’s online safety also recommended a greater focus on safety by design by platforms and regulators.

An explainer on “safety by design” by **Prof Lorna Woods OBE, expert adviser to the OSA Network**, can be found here: <https://www.onlinesafetyact.net/analysis/safety-by-design/>

A commentary piece by **Maeve Walsh, Director of the OSA Network**, on the DSIT “Growing up in the Online World” consultation - and the need for the Government to adopt this approach as part of their response - can be found here: <https://www.onlinesafetyact.net/analysis/beyond-bans-and-piecemeal-interventions-a-safety-by-design-approach-to-online-safety/>

About the Online Safety Act Network: The [Online Safety Act Network](#) works with over 80 civil society organisations, campaigners, academics and advocates with an interest in the effective implementation of the Online Safety Act 2023 (OSA). Our interests span the whole range of online harms: child protection, terrorism, extremism, violence against women and girls, suicide and self-harm prevention, mental health, hate speech and online abuse, fraud and scams, mis- and disinformation, harms to democracy and threats to our information environment.

20 May 2026

Online Safety Act Network

Contact: tallulah@onlinesafetyact.net