

## Online Safety Act implementation timescale, including OFCOM's consultation and report schedule

The Act received Royal Assent on 24 October 2023 and the timings below are drawn from Ofcom's roadmap ([July 2022](#)), letter to Peers ([April 2023](#)) and updates to their Roadmap ([June 2023](#)) and [October 2024](#).

\*\*\* NB dates beyond the date of this current update may therefore be indicative and subject to change. \*\*\*

Section 241 in [OSA 2023](#) sets out which provisions came in at Royal Assent. Other duties will not be activated until a later stage.

- Ofcom's information gathering powers (esp related to preparing codes and guidance - 91(5)(k-l)) in force immediately but Ofcom confirmed in October 2024 that would use them from 2025, in advance of publishing consultation material for extra duties on category 1 companies
- [Section 194](#) sets out the pieces of guidance that must be published "within 18 months" of the Act coming into force, **marked ++** below
- Ofcom's "supervisory engagement" with high-risk & high-impact services re their systems and processes started immediately and was referred to in Dame Melanie Dawes' [letter to Peter Kyle in Oct 2024](#) re the Southport riots.
- The secondary legislation for super complaints is – at the time of this update – still delayed.

KEY: **Ofcom lead**; **Govt/SofS lead**; **complete**; ++ covered in section 194. All references to [OSB 2023](#)

TABLE 1: implementing the regime

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
1	Summer 2023	Categorisation thresholds	<a href="#">Schedule 11</a>	To determine Cat 1, 2a and 2b	<a href="#">Call for evidence</a>	Sept 2023	Advice on thresholds published within 6 months of Royal Assent	Secondary legislation ( <b>See below – line 16</b> )	Yes: in force from 27 February 2025 ( <b>See below – line 22</b> )
2	November 2023	<a href="#">Illegal content risk assessments</a>	Section 9, <b>26</b>	All & <b>search</b>	Guidance	February 2024	<a href="#">Ofcom statement and final version</a> : 16 Dec 2024	<a href="#">Risk assessment guidance and risk profiles</a> First risk	Services had to submit first risk assessments to Ofcom by 31 March 2025.

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
								assessments start; 3 months to complete (16 March)	
3	November 2023	<a href="#">Illegal content</a> , which includes	Section 9, <b>26</b>	All & search	Code	February 2024	<a href="#">Ofcom statement and final version</a> : December 2024  <a href="#">Codes as laid here</a> . JCSI and SLSC completed 16/1.	Final codes approved by Parliament 24 February 2025: <a href="#">U2U</a> and <a href="#">Search</a>	Yes - 17 March 2025  <a href="#">Quick guide here</a>
4	November 2023	<a href="#">Terrorism</a>	Schedule 5	All & search	Code	February 2024	Included above	As above	As above
5	November 2023	<a href="#">CSEA</a>	Schedule 6	All & search	Code	February 2024	Included above	As above	As above
6	November 2023	<a href="#">Risk profiles</a>	<a href="#">Section 98</a>	All + search	Published with illegal harms material	February 2024	Regulated services must carry out risk assessments based on profiles	Final register of risks <a href="#">here</a>  <a href="#">Risk assessment guidance and risk profiles</a>	
7	November 2023	<a href="#">Illegal content judgements</a>	<a href="#">Section 193</a>	All & search	Guidance	3 months	<a href="#">Final version</a> 16 December 2024		
8	November 2023	<a href="#">Record keeping and review</a>	<a href="#">Section 23, 34</a>	All & search	Guidance	February 2024	<a href="#">Final version</a> 16 December 2024		
9	November	<a href="#">Enforcement</a>	Part 7,	All & search	Guidance	February 2024	<a href="#">Final version</a> 16		

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	2023	<a href="#">action</a>	Chapter 6 131-39				December 2024		
10	November 2023	<a href="#">SofS regulations re procedure for super complaints</a>	<a href="#">Section 169-171</a>	All	Secondary legislation	January 2024	SofS to lay SIs; then Ofcom to produce guidance (see below) – due “spring 2025”	DELAYED	DELAYED
11	December 2023 ++	<a href="#">Pornography Services</a>	Part 5	Pornography services	Guidance	March 2024	Govt commenced Part 5 duties on 17 January 2025 – duties on providers to use highly effective age assurance came in to effect.	<a href="#">age assurance guidance for part 5 published</a> on 16 January 2025	Duty in force from 17 January: Ofcom says “All services that allow pornography must implement highly effective age assurance to ensure that children are not normally able to access pornographic content by July 2025 at the latest”
12	March 2024	Additional duties for categorised services		Covering duties such as transparency, user empowerment,	<a href="#">Call for evidence</a>	May 2024	To inform duties – consultations to follow after register of categorised services is		

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
				ToS, fraudulent advertising			published.		
13	May 2024	<a href="#">Children's access assessment (CAA)</a>	<a href="#">Chapter 4</a>	All + search	Guidance	July 2024	<a href="#">Statement and final guidance</a> : 16 January 2025. Services have 3 months to carry out their CAA	<a href="#">Guidance published 16 January</a> – part 3 services have three months to complete the CAA.  <a href="#">Guidance for age assurance for part 3 services</a> also published.	Part 3 services must carry out their CAAs by 16 April 2025.  Services likely to be accessed by children then have 3 months to complete risk assessment.
14	July 2024 <sup>1</sup>	<a href="#">Transparency reports</a> <sup>2</sup>	<a href="#">Section 77</a>	All + search	Guidance	October 2024	Final guidance due in “early 2025”; Categorisation SIs were laid on 16 December 2024 and in force on 27 February; 4-5 months then for	Summer 2025: draft transparency notices issued “soon after” register of services is published in	End 2025: Final notices issued & first reports submitted to Ofcom by early 2026

<sup>1</sup> 2023 version of revised roadmap said “aiming to consult on our transparency guidance in the period between Royal Assent and Ofcom finalising the register of services, to allow us to launch our transparency regime as soon as possible” Remaining codes and guidance then consulted on after register is published. Delay to laying of secondary legislation by DSIT has pushed timescales forward. Oct 2024 roadmap: Ofcom expect SIs to be laid “by end 2024”, and then to take 4-5 months to complete their register of categorised services. Prioritising then the issuing of transparency notices, with drafts expected by summer 2025 and first transparency reports by end-2025.

<sup>2</sup> Ofcom letter to peers said that transparency, user empowerment and “other duties on categorised platforms” would be consulted on as soon as the list of categorised and emerging services has been published”, eg after the SI laid (likely summer 2024).

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
							register of services to be published.	summer 2025	
15	July 2024	<a href="#">Information-gathering</a>	<a href="#">Section 100</a>	All + search	Guidance	October 2024	<a href="#">Response to consultation and final guidance</a> published Feb 2025	<a href="#">Final version published 26 February</a>	
16	February 2024* - NB this had to be published within 6 months of Act being in force, eg April 2024	Categorisation thresholds	<a href="#">Schedule 11</a>	All - to define cat 1, 2A, 2B	Research and advice to Govt <sup>3</sup>	Categorisation <a href="#">WMS</a> and <a href="#">secondary legislation</a> published by DSIT, based on Ofcom's advice, alongside illegal harms statement in December 2024	<a href="#">SIs laid</a> on 16 December (see line 22 below)  <b>See line 22 below.</b>	Ofcom plan of work suggests register of categorised services will be complete in "summer 2025" ( <b>See line 41 below</b> )	<b>Yes – see line 22 below.</b>
17	May 2024	<a href="#">Sector risk assessments of regulated services - children's duties</a>	<a href="#">Section 99</a>	All + search		July 2024	<a href="#">Children's register of risks</a> published 24 April 2025	Risk register and risk profiles (as soon as reasonably practicable)	Autumn 2025
18	May 2024 ++	<a href="#">Children's risk assessments</a>	<a href="#">Section 11, 28</a>	All + search, if likely to be	Guidance	July 2024	<a href="#">Final guidance</a> published 24 April	<a href="#">April 2025</a> - first risk	24 July 2025 (first

<sup>3</sup> Ofcom letter to peers said research and advice to Govt on categorisation will be completed "within six months" of Royal Assent "or sooner if we can". It was published on 29 February 2024.

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
				accessed by children			2025	assessments to be undertaken by services who have assessed they are likely to be accessed by children; three months to complete.	assessments completed; see schedule 3)
19	May 2024 2024 <sup>4</sup>	Children's <a href="#">online safety codes</a>	Section 13, <b>29</b>	All + <b>search</b> , if likely to be accessed by children	Code	July 2024	<a href="#">Ofcom statement and final codes</a> : published 24 April	April 2025 - <a href="#">draft codes approved by SofS</a> and laid in Parliament, 40 days for approval.	25 July 2025: 21 days after approval by Parliament.
20	Oct 2024	<a href="#">Fee regime - including qualifying worldwide revenue definition; threshold figures for fees; and charging principles</a>	<a href="#">Part 6</a>	All + <b>search</b>	SofS, HMT, others	9 January 2025	Advice to SofS due in April 2025.	Draft SI to be laid by DSIT ( <b>see line 27 below</b> )	Invoices to be issued for the 2026/27 financial year
21	December 2024	<a href="#">Notices to deal with terrorism</a>	<a href="#">Section 121</a>	All & <b>search</b>	Guidance	10 March (3 months)	Final advice to SofS on "minimum	Dependent on SofS publication	

<sup>4</sup> Ofcom [letter to Peers](#) and updated roadmap in April 2023 confirmed that the draft children's codes and "associated consultations" would be published "around six months after receiving our powers"

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
		<a href="#">or CSEA content (eg use of accredited tech)</a>					standards of accuracy” and final guidance in 2025.	of minimum standards of accuracy, Ofcom will then develop the accreditation process.	
22	By end-2024	Categorisation thresholds	<a href="#">Schedule 11</a>	Category 1, 2A & 2B	Secondary legislation	Advice held up with DSIT SofS	<a href="#">SIs laid</a> on 16 December (see line 22 below)  Scrutiny by <a href="#">JCSI</a> and <a href="#">SLSC</a> completed 16/1  <a href="#">Commons delegated legislation committee</a> debate on 4 February.	<a href="#">Final regulations here</a>	YES: 27 February 2025
23	By autumn 2024 **	SofS regulations about reports to NCA	<a href="#">Section 67</a>	All	Secondary legislation	With NCA, Ofcom, other	Home Office Ministerial lead	<a href="#">Regulations laid</a> 19 March 2025	Yes: 19 March 2025
24	Draft published November 2024	<a href="#">SofS statement of strategic priorities</a>	<a href="#">172</a>	All	Statement	Consultation with OFCM and “others as appropriate” – closed 11 Jan 2025.	<a href="#">Final version published</a> by DSIT on 8 May 2025.	<a href="#">Final version laid in Parliament</a>	Designated 40 days after draft has been laid. Ofcom response due 40 days after.

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
25	25 February 2025	VAWG guidance	<a href="#">Section 54</a>	Part 3	Guidance	Victims commissioner; Domestic Abuse Commissioner are statutory consultees  Deadline 23 May 2025	Expect to publish final guidance by end of 2025, "with further iterations planned"	TBC	
26	End-2024, then April 2025, then "spring 2025".	Further Ofcom consultation: illegal harms/ children's measures. Plus ACM consultation <sup>5</sup>	<a href="#">Section 10</a>	All + search	Code updates	3 months – tbc autumn 2025	TBC summer 2026	TBC summer 2026	"These codes will come into force at some point in 2026"
27	No earlier than summer 2025	SofS regulations re fees	<a href="#">Part 6</a>	All + search	Secondary legislation	On advice from Ofcom – due April 2025 ( <b>see line 20 above</b> )	Draft SIs go through Parliament (Joint Committee on SIs, delegated leg committee)	Late 2025: Parliament approves regs	2026/27 Fee regime in place
28	Summer 2025 - after Ofcom's	Researchers' access to information	<a href="#">Section 162</a>	All & search	Guidance  Due alongside	With ICO, CDEI, UKRI, reps of regulated	Ofcom to publish report in summer 2025, with DSIT response in form of		

<sup>5</sup> Updated roadmap (Oct 2024) said this would included consultation on "how automated tools can be used to proactively detect illegal content and the content most harmful to children, going beyond the automated detection measures already consulted on". Letter to Secretary of State re Southport riots also confirmed this consultation would include: a new measure that would place additional requirements on services regarding their crisis response protocols. We are also considering the evidence base for potential new measures on livestreaming functionalities and recommender systems."



	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	report on subject (see below)	<a href="#">Call for evidence closed 17 January</a>			DSIT proposals for regulations to bring into effect the provisions in the Data (Access & Use) bill.	services, others 3 months	consultation on regulations to bring in the provisions in the Data Access and Use Bill.		
29	Summer 2025	Researchers' access to information	Amendment to OSA <a href="#">Section 162</a> via Data Bill	All & search	Regulations	TBC	Draft SIs	TBC	TBC
30	TBC q1 2025/26 - after regs laid (see above – line 10)	Super complaints	<a href="#">170-2</a>	All & search	Guidance	3 months		Late 2025 subject to secondary legislation being in place.	
31	Register of categorised services	Categorisation threshold regulations in force February 2025		All & search (subject to categorisation)	Register				
32	"No later than early	User empowerment assessment	<a href="#">Section 14</a>	Category 1	Guidance	3 months Consult with	TBC	TBC	TBC

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	2026 <sup>6</sup>	duties				ICO			
33	No later than early 2026 <sup>7</sup>	User empowerment: content	<a href="#">Section 15</a>	Category 1	Guidance which contains “examples of content or kinds of content” to which duty applies	3 months	Ofcom statement tbc: (a year after draft)	TBC (Parliamentary approval of code)	TBC 21 days after issue
34	No later than early 2026 <sup>8</sup>	Terms of Service	Section 72, 73	Category 1	Guidance	3 months	Ofcom statement tbc: (a year after draft)	TBC (Parliamentary approval of code)	TBC 21 days after issue
35	“No later than early 2026 <sup>9</sup> ”	Content of democratic importance	<a href="#">Section 17</a>	Category 1	Code	3 months			
36	No later than early 2026 <sup>10</sup>	News publisher content	<a href="#">Section 18</a>	Category 1	Guidance	3 months			

<sup>6</sup> Ofcom letter to peers said that transparency, user empowerment and “other duties on categorised platforms” would be consulted on as soon as the list of categorised and emerging services has been published”, eg after the SI laid (likely summer 2024). This is revised due to delays to register to “no later than early 2026”, according to Oct 2024 roadmap.

<sup>7</sup> As above.

<sup>8</sup> As above.

<sup>9</sup> “Other duties on categorised platforms to be consulted on as soon as the list of categorised and emerging services has been published. This is revised due to delays to register to “no later than early 2026”, according to Oct 2024 roadmap.

<sup>10</sup> As above.

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
37	No later than early 2026	Journalistic content	<a href="#">Section 19</a>	Category 1	Code	3 months			
38	No later than early 2026 <sup>11</sup> ++	Fraudulent advertising	<a href="#">Section 38, 39, 40</a>	Category 1 + search	Code	3 months			
39	No later than early 2026 <sup>12</sup>	Freedom of expression & privacy: impact assessments	<a href="#">Section 22</a> <a href="#">Section 33 (4), (6), (7)</a>	Category 1 + search		3 months			
40	No later than early 2026 <sup>13</sup>	Option for User ID for adults	Section 65	Category 1	Guidance	3 months			
41	TBC	Privacy	22 (3), 32	All & search	Guidance? (44(2) ref "recommended measures")				
42	No later than early 2026	Disclosure of information about use of service by deceased child	77	Cat 1, 2A & 2B	Guidance	3 months	TBC	TBC	

<sup>11</sup> As above.

<sup>12</sup> As above.

<sup>13</sup> As above.

LAST UPDATED: 14 MAY 2025

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
		users							
43	TBC	Content reporting	Section 20, 30	All & search	Code	3 months	A year after draft		
44	TBC	Complaints	Section 21, 31	All & search	Code	3 months			

Table 2: Other publications

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
October 2024 – within the period of one year from OSA being passed	Media literacy strategy	167		Strategy – to set out how they propose to exercise functions under section 11	As appropriate	<a href="#">Media Literacy Strategy (Oct 2024)</a>	To publish successive strategy within 3 years	
Summer 2025 <sup>14</sup>	Media literacy statement	<a href="#">Section 166</a>		Ofcom annual report to contain a statement summarising activities carried out in financial year re exercise of functions under section 11				
Q3 2025/2026	Report on VSP transition following repeal			From draft Plan of Work p41 The UK Government has given VSPs notice of its intention to repeal the regime. Ofcom will support VSP				

<sup>14</sup> According to October 2024 roadmap.

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
				providers in transitioning to the online safety regime and produce an end of regime report following repeal.				
In 2026 <sup>15</sup> – “within period beginning two years and ending three years after child safety duties come into force (cl 12, 29)	Report on apps stores use by children	162		Report				
2026 <sup>16</sup>	Report assessing use of age assurance for purpose of compliance with clause 12 (child safety duties) and clause 82 (porn duties)	158	All	Report	ICO, “other persons as OFCOM consider appropriate”	Send to SofS and lay in Parliament.	SofS may require a further report after 3 years	

<sup>15</sup> According to October 2024 roadmap.

<sup>16</sup> According to October 2024 roadmap

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
Mid-2026 - 18 months after cttee set up (tbc)	Report from Committee on disinformation and misinformation	153	All	Report -				
TBC - within two years of sections 18 and 19 coming into force	News publisher content and journalistic content	159	Category 1	Report	Recognized news publishers, creators of journalistic content, Cat 1 providers, "others as appropriate"	Send to SofS and lay in Parliament	SofS can require (after 3 years of first report) a further report if s/he considers regulatory framework "may be having a detrimental effect"	
TBC – two years after coming into force	Report about reporting and complaint procedures	161	Part 3 services	Report	SofS, reps of part 3 services, reps of children, ICO, other persons	Send to SofS and lay in Parliament	SofS must respond within 3 months and include response to any advice re making regulations under section 218 (power to impose alternative dispute resolution)	
Late 2026 - one year after first provider transparency reports	Ofcom transparency reports - based on provider reports	160	All	Report				

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
Before October 2026 <sup>17</sup>	Review and report on content harmful to children – incidence and severity	63	All	Report		Send to SofS to include recommendations whether it is appropriate to make changes to s61 & 62 (primary priority and priority content)	TBC – amendments to change s61 and s62  Reports required “no more than 3 years apart”	
2028 - two years after the last Pt 3 provisions in force	Secretary of State review of the OSA	159	All	Report	OFCOM, others	Report laid before Parliament		
As required	Media literacy statement = recommending ways in which others, including providers, might develop, pursue and evaluate activities relevant to media literacy	166		Statement		Publish it “in such manner as they consider appropriate”		
As required	Report in connection with	164		Report	On receipt of notice from coroner,			

<sup>17</sup> According to Oct 2024 Roadmap



Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
	investigation into a death				procurator fiscal or NI coroner			
Annual	Report about exercise of functions under pt7, chapter 5 (notices to deal with terrorism and CSEA content)	129	All	Report	Send to SofS an lay in Parliament			
Annual	Research into users' experience of regulated services	155	All	Report		OFCOM annual report to contain statement about research		
Annual	Statement about "steps they have taken and processes they operate to ensure online safety functions have been exercised in that year compatibly with Art 8 & 10"	157	All	Statement		OFCOM annual report to contain statement		