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 (<u>July 2022</u>), letter to Peers (<u>April 2023</u>), letter to <u>Committee Chairs</u> (October 2025) and updates to their Roadmap (<u>June 2023</u>) and <u>October 2024</u>. A further update is expected in November 2025. *** NB dates beyond the date of this current update are 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 it would use them from 2025, in advance of publishing consultation material for extra duties on category 1 companies
- <u>Section 194</u> 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' <u>letter to Peter Kyle in Oct 2024</u> re the Southport riots.

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	Schedule 11	To determine Cat 1, 2a and 2b	Call for evidence	Sept 2023	Advice on thresholds published within 6 months of Royal Assent	Secondary legislation (See below – line 16)	Yes: in force from 27 February 2025 (See below – line 22)
2	November 2023	Illegal content risk assessments	Section 9, 26	All & search	Guidance	February 2024	Ofcom statement and final version: 16 Dec 2024	Risk assessment guidance and risk profiles First risk assessments	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
								start; 3 months to complete (16 March)	
3	November 2023	Illegal content, which includes	Section 9, 26	All & search	Code	February 2024	Ofcom statement and final version: December 2024 Codes as laid here. JCSI and SLSC completed 16/1.	Final codes approved by Parliament 24 February 2025: U2U and Search	Yes - 17 March 2025 Quick guide here
4	November 2023	<u>Terrorism</u>	Schedule 5	All & search	Code	February 2024	Included above	As above	As above
5	November 2023	<u>CSEA</u>	Schedule 6	All & search	Code	February 2024	Included above	As above	As above
6	November 2023	Risk profiles	Section 98	All + search	Published with illegal harms material	February 2024	Regulated services must carry out risk assessments based on profiles	Final register of risks here Risk assessment guidance and risk profiles	
7	November 2023	Illegal content judgements	Section 193	All & search	Guidance	3 months	Final version 16 December 2024		
8	November 2023	Record keeping and review	<u>Section</u> 23, 34	All & search	Guidance	February 2024	Final version 16 December 2024		
9	November 2023	Enforcement action	Part 7, Chapter 6	All & search	Guidance	February 2024	Final version 16 December 2024		

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
			131-39						
10	November 2023	SofS regulations re procedure for super complaints	<u>Section</u> 169-171	All	Secondary legislation	January 2024	Ofcom consulting on guidance; closes 3 November.	SI laid 25 July 2025	31 December 2025
11	December 2023 ++	Pornography Services	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.	age assurance guidance for part 5 published 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, ToS,	Call for evidence	May 2024	Delayed. 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
				fraudulent advertising			published. Date TBC.		
13	May 2024	Children's access assessment (CAA)	Chapter 4	All + search	Guidance	July 2024	Statement and final guidance: 16 January 2025. Services have 3 months to carry out their CAA	Guidance published 16 January – part 3 services have three months to complete the CAA. Guidance for age assurance for part 3 services 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 ¹	Transparency reports ²	Section 77	All + search	Guidance	October 2024	Statement and final guidance: 21 July 2025	Statement and final guidance: 21 July 2025 Draft transparency notices were due to be issued "soon after"	Delayed: Final notices & first reports were due to be submitted to Ofcom by early 2026. Register of categorised services still tbc

¹ 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 pushed timescales forward; legal challenge in summer 2025 has delayed this further, with the register of categorised services not yet published as at October 2025. Draft transparency notices were expected by summer 2025 and first transparency reports by end-2025; these all now shift into 2026.

² 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 published; this is delayed.	
15	July 2024	Information- gathering	Section 100	All + search	Guidance	October 2024	Response to consultation and final guidance published Feb 2025	Final version published 26 February	
16	February 2024* - NB this had to be published within 6 months of Act being in force, eg April 2024	Categorisation thresholds	Schedule 11	All - to define cat 1, 2A, 2B	Research and advice to Govt ³	Categorisation WMS and secondary legislation published by DSIT, based on Ofcom's advice, alongside illegal harms statement in December 2024	Sis laid on 16 December (see line 22 below) See line 22 below.	Ofcom plan of work suggested register of categorised services will be complete in "summer 2025". This is now delayed. (See line 41 below)	Yes – see line 22 below.
17	May 2024	Sector risk assessments of regulated services - children's duties	Section 99	All + search		July 2024	Children's register of risks published 24 April 2025	Risk register and risk profiles (as soon as reasonably practicable)	Autumn 2025

³ 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
18	May 2024 ++	Children's risk assessments	Section 11, 28	All + search, if likely to be accessed by children	Guidance	July 2024	Final guidance published 24 April 2025	April 2025 - first risk assessments to be undertaken by services who have assessed they are likely to be accessed by children; three months to complete.	24 July 2025 (first assessments completed; see schedule 3)
19	May 2024 2024 ⁴	Children's online safety codes	Section 13, 29	All + search, if likely to be accessed by children	Code	July 2024	Ofcom statement and final codes: published 24 April	April 2025 - draft codes approved by SofS and laid in Parliament, 40 days for approval.	25 July 2025: 21 days after approval by Parliament.
20	Oct 2024	Fee regime - including qualifying worldwide revenue definition; threshold figures for fees; and charging principles	Part 6	All + search	SofS, HMT, others	9 January 2025	Advice to SofS due in April 2025. Statement published: 26 June 2025.	Final SI laid: 17 September 2025 Final statement due: January 2026	Invoices to be issued for the 2026/27 financial year

⁴ Ofcom <u>letter to Peers</u> 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
21	December 2024	Notices to deal with terrorism or CSEA content (eg use of accredited tech)	Section 121	All & search	Guidance	10 March (3 months)	Delayed: Final advice to SofS on "minimum standards of accuracy" and final guidance "by April 2026" (was to have been "in 2025)	Dependent on SofS publication of minimum standards of accuracy, Ofcom will then develop the accreditation process.	
22	By end- 2024	Categorisation thresholds	Schedule 11	Category 1, 2A & 2B	Secondary legislation	Advice held up with DSIT SofS	SIs laid on 16 December (see line 22 below) Scrutiny by JCSI and SLSC completed 16/1 Commons delegated legislation committee on 4 February.	Final regulations here	YES: 27 February 2025
23	By autumn 2024 **	SofS regulations about reports to NCA	Section 67	All	Secondary legislation	With NCA, Ofcom, other	Home Office Ministerial lead	Regulations laid 19 March 2025 Revoked: 9 October 2025	No: were due to come into force on 3 November but were revoked. ageNew date tbc.
24	Draft	<u>SofS</u>	<u>172</u>	All	Statement	Consultation	Final version	Final version laid	Designated 40

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	published November 2024	statement of strategic priorities				with OFCM and "others as appropriate" – closed 11 Jan 2025.	published by DSIT on 8 May 2025.	<u>in Parliament</u>	days after draft has been laid. Ofcom response published on 25 July.
25	25 February 2025	Protecting women and girls guidance	Section 54	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". Report on platforms' progress promised 18 months later ⁵	TBC	
26	End-2024, then April 2025, then "spring 2025"; eventually published 30 June 2025	Additional Safety Measures Ofcom consultation: illegal harms/ children's measures. Plus ACM consultation ⁶	Section 10	All + search	Code updates	Consultation ended 20 October 2025	TBC summer 2026	TBC summer 2026	"These codes will come into force at some point in 2026"

⁵ See letter to <u>Select Committee Chairs</u> (October 2025)

⁶ Updated roadmap (Oct 2024) said this would include 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
27	No earlier than summer 2025	SofS regulations re fees	Part 6	All + search	Secondary legislation	On advice from Ofcom – due April 2025 (see line 20 above)	Draft SIs go through Parliament (Joint Committee on SIs, delegated leg committee) Final guidance on notification and QWR and consultation on Ofcom's statement of charging principles due in November.	SI published: 17 September 2025 Final statement due in January 2026	2026/27 Fee regime in place
28	Summer 2025 - after Ofcom's report on subject (see below)	Researchers' access to information Call for evidence closed 17 January	Section 162	All & search	Guidance Due alongside DSIT proposals for regulations to bring into effect the provisions in the Data (Access & Use) Act.	With ICO, CDEI, UKRI, reps of regulated services, others 3 months	Ofcom report: July 2025. DSIT response in form of consultation on regulations to bring in the provisions in the Data Access and Use Act: tbc	TBC	
29	Summer 2025	Researchers' access to information	Amend- ment to OSA Section	All & search	Regulations	TBC	Draft SIs	TBC	TBC

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	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
			162 via Data Bill						
30	TBC q1 2025/26 - after regs laid (see above – line 10)	Super complaints	170-2	All & search	Guidance	Ofcom consultationv: closes 3 November 2025	TBC	Late 2025.	Regs come into force 31 December 2025
31	Register of categorise d services	Categorisation threshold regulations in force February 2025		All & search (subject to categorisation)	Register	TBC – delayed by legal review of regs in summer 2025			
32	"No later than early 2026" ⁷	User empowerment assessment duties	Section 14	Category 1	Guidance	3 months Consult with ICO	TBC	TBC	TBC
33	No later than early 2026 ⁸	User empowerment: content	Section 15	Category 1	Guidance which contains "examples of content or kinds of content" to which duty	3 months	Ofcom statement tbc: (a year after draft)	TBC (Parliamentary approval of code)	TBC 21 days after issue

⁷ 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.

⁸ As above.

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
					applies				
34	No later than early 2026 ⁹	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 ¹⁰	Content of democratic importance	Section 17	Category 1	Code	3 months			
36	No later than early 2026 ¹¹	News publisher content	Section 18	Category 1	Guidance	3 months			
37	No later than early 2026	Journalistic content	Section 19	Category 1	Code	3 months			
38	No later than early 2026 ¹² ++	Fraudulent advertising	Section 38, 39, 40	Category 1 + search	Code	3 months			
39	No later than early 2026 ¹³	Freedom of expression & privacy: impact assessments	Section 22 Section	Category 1 + search		3 months			

⁹ As above.

¹⁰ "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.

¹¹ As above.

¹² As above.

¹³ As above.

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
			33 (4), (6), (7)						
40	No later than early 2026 ¹⁴	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 "recommen ded measures")				
42	No later than early 2026	Disclosure of information about use of service by deceased child users	101 and section 124 of Data (Use and Access) Act	Cat 1, 2A & 2B	Guidance related to regulations on data preservatio n which came into force on 30 September via the Data (Use and Access) Act to strengthen Ofcom powers in s101	Consultation on data preservation notices: ends 28 October 2025	TBC	TBC	
43	TBC	Content	Section	All & search	Code	3 months	A year after draft		

¹⁴ As above.

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
		reporting	20, 30						
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	Media Literacy Strategy (Oct 2024)	To publish successive strategy within 3 years	
Summer 2025 ¹⁵	Media literacy statement	Section 166		Statement	Consultation on how online platforms can promote media literacy: closes 8 December 2025	April 2026 ¹⁶	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 providers in transitioning				

According to October 2024 roadmap.
 According to <u>letter to Select Committee Chairs</u> (October 2025)

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
				to the online safety regime and produce an end of regime report following repeal.				
In 2026 ¹⁷ – "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 ¹⁸	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	
Mid-2026 - 18 months after	Report from Committee on	153	All	Report -				

According to October 2024 roadmap.
 According to October 2024 roadmap and letter to Select Committee chairs (October 2025)

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
cttee set up (tbc)	disinformation and misinformation							
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				
Before October	Review and report on content	63	All	Report		Send to SofS to include recommendatio	TBC – amendments to change s61 and	

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
2026 ¹⁹	harmful to children – incidence and severity					ns whether it is appropriate to make changes to s61 & 62 (primary priority and priority content)	Reports required "no more than 3 years apart"	
May 2027 – 18 months after publication of guidance	Report on platforms performance against the guidance on protecting women and girls	123	Part 3	Report – as promised in letter to Select Committees				
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	166		Statement		Publish it "in such manner as they consider appropriate"		

¹⁹ According to Oct 2024 Roadmap

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
	relevant to media literacy							
As required	Report in connection with investigation into a death	164		Report	On receipt of notice from coroner, 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	157	All	Statement		OFCOM annual report to contain statement		

Earliest date	Subject	OSA	Services covered	Format	Consultation	Final version	Follow up?	
	in that year compatibly with Art 8 & 10"							