

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 has confirmed in October 2024 that they will only start to use them in 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.
- There are delays to two pieces of secondary legislation at the time of this update: categorisation thresholds; and super complaints.

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)	Not yet. See line 16.
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	Services to submit to first risk assessments to Ofcom by 31

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								assessments start; 3 months to complete (16 March)	March 2025.
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 . Parliamentary approval process should complete by Feb 2025: 40 days after codes are laid. Scrutiny by JCSI and SLSC completed 16/1.	16 March 2025: 21 days after Parly approval
4	November 2023	Terrorism	Schedule 5	All & search	Code	February 2024	Included above	As above	As above
5	November 2023	CSEA	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		

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8	November 2023	Record keeping and review	Section 23, 34	All & search	Guidance	February 2024	Final version 16 December 2024		
9	November 2023	Enforcement action	Part 7, Chapter 6 131-39	All & search	Guidance	February 2024	Final version 16 December 2024		
10	November 2023	SofS regulations re procedure for super complaints	Section 169-171	All	Secondary legislation	January 2024	SofS to lay SIs; then Ofcom to produce guidance (see below) – due “spring 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”

	Date issued/earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
12	March 2024	Additional duties for categorised services		Covering duties such as transparency, user empowerment, ToS, fraudulent advertising	Call for evidence	May 2024	To inform duties – consultations to follow after register of categorised services is published, which is dependent on approval of regulations.		
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 (which is when children's risk assessment guidance and codes are likely to be published). Services likely to be accessed by children then have 3 months to complete risk assessment.
14	July 2024 ¹	Transparency	Section	All + search	Guidance	October 2024	Final guidance due	Summer 2025:	End 2025: Final

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 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.

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
		reports ²	77				in “early 2025”; Categorisation SIs were laid on 16 December 2024; 4-5 months then for register of services to be published.	draft transparency notices issued “soon after” register of services is published in summer 2025	notices issued & first reports submitted to Ofcom by early 2026
15	July 2024	Information-gathering	Section 100	All + search	Guidance	October 2024	Final guidance expected in “early 2025”		
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 suggests register of categorised services will be complete in “summer 2025”	Once secondary legislation is approved.
17	May 2024	Sector risk assessments	Section 99	All + search		July 2024	15/16 April 2025 (Tbc)	Risk register and risk profiles (as	Autumn 2025

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).

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
		of regulated services - children's duties						soon as reasonably practicable)	
18	May 2024 ++	Children's risk assessments	Section 11, 28	All + search, if likely to be accessed by children	Guidance	July 2024	Final guidance: 15/16 April 2025 tbc	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.	July 2025 (first assessments completed and submitted to Ofcom by 31/7; 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: 15/16 April 2025 tbc	April 2025- approval by SofS, followed by approval by Parliament - 40 days.	July 2025: 21 days after approval by Parliament.
20	Oct 2024	Fee regime - including qualifying worldwide revenue definition; threshold	Part 6	All + search	SofS, HMT, others	9 January 2025	Advice to SofS due in April 2025.	Draft SI to be laid by DSIT.	Invoices to be issued for the 2026/27 financial year

⁴ 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
		figures for fees; and charging principles							
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)	Final advice to SofS on “minimum standards of accuracy” and final guidance 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	<p>SIs laid on 16 December (see line 22 below)</p> <p>Scrutiny by JCSI and SLSC completed 16/1</p> <p>Commons delegated legislation committee debate on 4 February.</p> <p>Lords debate due on 24 February.</p>	Early 2025 – 40 days for Parliamentary approval of regulations.	Regulations come into force 21 days after Parliamentary approval – eg spring 2025
23	By autumn	SofS regulations	Section 67	All	Secondary legislation	With NCA, Ofcom, other			

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	2024 ** NB no details on these to date	about reports to NCA							
24	Draft published November 2024	SofS statement of strategic priorities	172	All	Statement	Consultation with OFCM and “others as appropriate” – closed 11 Jan 2025.	Final version to be published by DSIT (date tbc) then 40 days for Ofcom response; draft laid in Parliament	Tbc spring 2025	Designated 40 days after draft has been laid
25	25 February 2025	VAWG guidance	Section 54	Part 3	Guidance	Victims commissioner; Domestic Abuse Commissioner are statutory consultees 3 months: deadline tbc.	Expect to publish final guidance by end of 2025, “with further iterations planned”	TBC	
26	April 2025	Further Ofcom consultation: illegal harms/ children’s measures. Plus ACM consultation ⁵	Section 10	All + search	Code	3 months (July 2025)	TBC early 2026	TBC early 2026	“These codes will come into force at some point in 2026”

⁵ 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

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	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 above)	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 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) bill.	With ICO, CDEI, UKRI, reps of regulated services, others 3 months	Ofcom to publish report in summer 2025, with DSIT response in form of 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 Section 162 via Data Bill	All & search	Regulations	TBC	Draft SIs	TBC	TBC
30	TBC q1 2025/26 - after regs	Super complaints	170-2	All & search	Guidance	3 months		Late 2025 subject to secondary	

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
	laid (see above – line 10)							legislation being in place.	
31	“No later than early 2026” ⁶	User empowerment assessment duties	Section 14	Category 1	Guidance	3 months Consult with ICO	TBC	TBC	TBC
32	No later than early 2026 ⁷	User empowerment: content	Section 15	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
33	No later than early 2026 ⁸	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
34	“No later than early	Content of democratic importance	Section 17	Category 1	Code	3 months			

⁶ 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.

⁷ As above.

⁸ As above.

	Date issued/ earliest date	Duty/SI	OSB	Services covered	Format	Consultation ended/will end	Next stage	Final version	In force
	2026 ⁹								
35	No later than early 2026 ¹⁰	News publisher content	Section 18	Category 1	Guidance	3 months			
36	No later than early 2026	Journalistic content	Section 19	Category 1	Code	3 months			
37	No later than early 2026 ¹¹ ++	Fraudulent advertising	Section 38, 39, 40	Category 1 + search	Code	3 months			
38	No later than early 2026 ¹²	Freedom of expression & privacy: impact assessments	Section 22 Section 33 (4), (6), (7)	Category 1 + search		3 months			
39	No later than early 2026 ¹³	Option for User ID for adults	Section 65	Category 1	Guidance	3 months			
40	TBC	Privacy	22 (3), 32	All & search	Guidance? (44(2) ref				

⁹ “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.

¹⁰ As above.

¹¹ As above.

¹² As above.

¹³ As above.

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					“recommended measures”)				
41	No later than early 2026	Disclosure of information about use of service by deceased child users	77	Cat 1, 2A & 2B	Guidance	3 months	TBC	TBC	
42	TBC	Content reporting	Section 20, 30	All & search	Code	3 months	A year after draft		
43	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 ¹⁴	Media literacy statement	Section 166		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				

¹⁴ 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 ¹⁵ – “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 ¹⁶	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	

¹⁵ According to October 2024 roadmap.

¹⁶ 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 ¹⁷	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,			

¹⁷ 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		