

Terry Green Authors *GRIP* Article About UK Focus on the Protection of Children Online

April 29. 2025

Intellectual Property Partner Terry Green, London Deputy Managing Partner, authored an article for *Global Relay Intelligence & Practice (GRIP)* about the heightened focus on protecting children online, following The Office of Communications' (Ofcom) recent policy statement as part of its Phase 2 implementation of the Online Safety Act (OSA). The statement outlines new obligations, as of April 16, for platforms anywhere in the world with links to the United Kingdom to conduct a Children's Access Assessment every 12 months at minimum to evaluate the likelihood of children accessing their services. Such assessments are crucial to understanding the potential risks and impacts on children using these platforms, even those providing adult-only content, since Ofcom expects them to implement effective age assurance measures.

In the article, Terry explains that the Children's Risk Assessment, which employs the same methodology as the Illegal Harms Risk Assessment, categorizes harmful content into three categories: Primary Priority Content (PPC), Priority Content (PC) and Non-Designated Content (NDC). PPC includes content such as pornography and materials promoting self-harm, while PC covers broader issues, such as abuse and bullying. NDC involves content that could significantly harm children, such as content promoting body-shaming and depression or despair, as well as any other content identified by Ofcom or platforms themselves. Platforms are required to assess the likelihood of a child encountering such content and must evaluate the impact on children from the type of content by July 24. Platforms are also obligated to report identified NDC to Ofcom, and while there is no specified timeframe for reporting, the most recent Children's Risk Assessment would likely discover newly identified NDC that should be reported accordingly upon conclusion of the assessment.

Looking ahead, Terry highlights the forthcoming Phase 2 of the OSA, which includes additional risk assessments and over 70 recommended measures for platforms. These measures focus on governance, content moderation and age assurance processes, with a likely compliance deadline of February 2026. Platforms are advised to use their Illegal Harms Risk Assessment to help build their

Children's Risk Assessment to streamline their efforts. Ofcom also has numerous live consultations relating to changes to user controls and disabling comments, as well as the protections for women and girls online.

"Keeping kids safe online, one risk assessment at a time," April 28, 2025

Also see:

"Byte-Sized Protection: Keeping Kids Safe Online, One Risk Assessment at a Time," April 29, 2025

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