

Media Quotes Terry Green on UK Online Safety Act and Ofcom's Compliance Expectations

March 20, 2025

Media outlets, including *TechInformed*, *TechRadar*, *Global Relay Intelligence & Practice (GRIP)* and Lexology, featured comments from Intellectual Property Partner Terry Green, our London office's Deputy Managing Partner, about the United Kingdom's Online Safety Act (Act), effective as of March 17. Terry was quoted regarding the Office of Communications' (Ofcom) enforcement programme requirements and the authority's crackdown on UK tech firms.

The Act, introduced in 2021 and passed in late 2023, has faced criticism for potentially infringing on free speech and challenges in moderating content at scale. Now that it has officially come into force, the Act requires online platforms to protect users from illegal content, particularly child sexual abuse material. Platforms had until March 16 to complete risk assessments and implement measures to swiftly remove illegal content. Ofcom, the UK communications regulator, has started enforcing compliance, with noncompliance potentially resulting in fines of up to 10 percent of global turnover or £18 million.

"Service providers must fully take into account Ofcom's risk profiles and meet robust record-keeping requirements," Terry told *TechInformed*. "On day one, Ofcom has already launched an enforcement programme targeting smaller file-sharing services. This shows it is serious about ensuring even small providers adhere to their obligations." He added that platforms should expect heightened regulatory pressure in the next 12 months as further phases of the Act are rolled out, including obligations concerning child safety, adult content, and protection for women and girls.

In the *TechRadar* article, Terry noted, "From [Katten's] experience in advising clients with their Online Safety Act experience and assisting with their risk assessments, it is important for service providers to get it right and conduct the risk assessments properly." He also stated that "service providers must fully take into account Ofcom's risk profiles and various factors attributing to the risks, and meet robust record-keeping requirements," emphasizing that "the amount of guidance released by Ofcom

indicates it has high expectations in terms of how service providers are complying with its statutory duty."

Additionally, Terry co-authored a blog post with Corporate Trainee Solicitor Larry Wong, published on *GRIP* and Lexology, about the increased pressure platforms are facing under the Act to have risk assessments in place "to understand how likely it is for its users to encounter illegal content on their service."

"Over 100,000 services are estimated to be in scope under [the Act] whether they are user-to-user services or search engines," Terry and Larry wrote, adding that "there are also over 40 recommended measures that Ofcom expects service providers to implement over the course of the next few months and to 'comply or explain' if they are not implemented."

["UK's Online Safety Act takes effect with regulator action underway,"](#) *TechInformed*, March 18, 2025

["Ofcom cracks down on UK tech firms, will issue sanctions for illegal content,"](#) *TechRadar*, March 18, 2025

["Ofcom ramps up pressure for platforms under UK Online Safety Act,"](#) *GRIP*, March 28, 2025

["Turning Up the Heat - Ofcom Ramps Up Pressure for Platforms under the Online Safety Act,"](#) Lexology, March 17, 2025

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