

Ofcom (via email)

18<sup>th</sup> July 2025

**RE: Protecting Children from Harms Online Volume 6: Illegal Harms Further Consultation: User Controls**

The Online Dating and Discovery Association (ODDA) is the global voice for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing over 300 brands, the ODDA works with its members to promote the importance of trust and safety in keeping users safe from harm.

We would like to thank Ofcom for the opportunity to provide feedback on this important consultation, which proposes amending the Illegal Content Codes of Practice under the Online Safety Act to expand the application of the blocking and muting of user accounts and the disabling of comments.

The ODDA broadly welcomes the proposals which reflect the 'security-by-design' approach our members have embedded to improve the safety of users. We particularly welcome the inclusion of the estimated direct and indirect costs and the recognition by Ofcom that revenue may fall as a result of compliance with the proposals. Like other sectors, small and medium-sized enterprises (SMEs) make up a large percentage of online dating and social discovery apps. In a competitive marketplace, many of these firms generate income solely through advertising revenue and face considerable challenges in absorbing these costs where they don't offer paid-for subscriptions. As a result, there is a risk that the impact on smaller firms may be disproportionately greater than on larger ones. We ask Ofcom to consider ways of mitigating this risk where possible.

However, we also welcome the point in paragraph 1.28 (c) that smaller services with fewer than 700,000 monthly users and a medium risk of harm are more likely to meet their Illegal Content Duties under the Act by focusing on other measures recommended in the codes. This may off-set some of the administrative burden and impact on smaller firms that we reference above and demonstrate that Ofcom have listened to our previous feedback about the importance of adopting a proportionate and risk-based approach.

Finally, we would like to remind Ofcom of the importance of ensuring flexibility in the way in-scope services achieve the outcomes of the Act. Legislation targeted at regulating the digital economy should encourage and support innovation without being overly prescriptive on the measures to achieve compliance.

Your sincerely,



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