

To: Ofcom (via email)

20th October 2025

RE: OFCOM CONSULTATION ON ADDITIONAL MEASURES UNDER THE ONLINE SAFETY ACT:

Dear Sir,

We would like to thank Ofcom for the opportunity to respond to this important consultation on additional safety measures under the Online Safety Act (OSA). As the global voice for the sector, the Online Dating and Discovery Association (ODDA) represents nearly 500 brands worldwide with millions of users in the UK. Keeping users safe from online harms is a top priority for our members and we broadly welcome the package of proposals contained within the consultation document.

Our response to relevant parts of the consultation is set out below:

Q2: Do you have further evidence regarding the benefits to users or children from livestreaming?

Livestreaming is a common feature among some online dating and social discovery apps which allows users to get to know each other online before taking the relationship offline and meeting in real life. It is seen as providing users with an additional in-app security measure as part of their wider trust and safety strategy.

Q3: Livestreaming – Reporting Content

The ODDA agrees that providers should have a mechanism in place to enable users to report livestream content that depicts the risk of imminent physical harm. However, while we recognise the benefit of using both technical and human content moderation, we do not feel that the requirement on providers to “*ensure that human moderators are available whenever users can livestream using the service*” is necessary or proportionate, particularly for smaller platforms. Instead, we suggest that Ofcom adopts a more flexible, risk-based approach.

Q11: Use of Proactive Technologies for Detecting Content:

The ODDA broadly agrees with the proposal to require service providers to assess whether accurate and effective proactive technology exists for detecting content including CSAM, fraud and other online harms, which reflects what many of our members have already been doing in recent years as part of their wider trust and safety strategy.

Q19: Perceptual hash matching for intimate image abuse:

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The ODDA broadly agrees with the proposal to expand Perceptual Hash Matching and supports its use where appropriate. We also believe that in-scope services should be provided with flexibility in relation to how the measures are implemented ensuring they are reasonable and proportionate for the type of service provided.

Q36: User banning and preventing return following detection of child sexual exploitation and abuse content:

The ODDA broadly agrees with the proposal and welcomes the suggestion that providers should have discretion over the technical measures they use to prevent a banned user from returning to the service. However, we also think it is important to stress that service providers must retain autonomy in interpreting and enforcing their own terms of service. While regulators should establish baseline safety requirements, the specific mechanisms for content moderation and policy enforcement must remain at the discretion of individual services.

Q41: Highly effective age assurance in the Illegal Content User-to-user Codes:

The ODDA welcomes the proposal to provide consistency in relation to Highly Effective Age Assurance (HEAA) across the two Codes. However, we note that this proposal comes at a time when many providers are in the process of implementing HEAA and any changes could add to the administrative burden many smaller firms will face to ensure compliance.

Q42: Proposal to introduce age assessment appeals measures into the Illegal Content User-to-user Codes:

While the ODDA endorses the principle of allowing appeals, we urge Ofcom to consider the balance between the need to preserve the integrity, security and privacy of age assurance systems against the impact on providers.

Q56: Proportionality of the package of proposed measures for services in scope of the Illegal Content User-to-User Codes:

The ODDA supports the overarching objective of ensuring that illegal content is quickly identified, addressed, and prevented from spreading across online platforms. Our members are fully aligned with the principle that services should take reasonable and proportionate steps to mitigate the risk of harm arising from illegal content.

However, we have concerns that aspects of the package of proposed measures go beyond what is proportionate, particularly when considered alongside existing obligations set out in the initial Illegal Content Code, which came into force in March 2025. We encourage Ofcom to take a measured and evidence-led approach to further interventions, ensuring they remain technically feasible, risk-based, and adaptable to the range of services in scope.

Several of the additional proposals, such as the introduction of real-time moderation, represent a significant shift in regulatory expectations. Implementing such measures before the full impact

of the existing Code has been assessed risks layering new obligations without clear evidence of their necessity or effectiveness.

Furthermore, the services in scope of the Illegal Content User-to-User Codes vary widely in terms of size, risk profile and the resources available to them. Some of the proposed measures, while appropriate for high-risk or high-reach platforms, may impose disproportionate burdens on smaller providers or those with low exposure to illegal content.

Finally, we also recommend Ofcom maintain a technology-neutral stance, allowing services to meet safety outcomes using the most effective tools available to them, rather than prescribing specific technical solutions.

We look forward to your response.

Yours sincerely,



Simon Newman
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