



GT UK Online Safety Act



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The UK's online safety regime is here. Will anybody notice?

From Friday, Brits online may run into age gates on adult content. But other changes required by the Online Safety Act may be harder to spot.


Online Safety Act: explainer

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UK's OSA and EU's DSA compared

Aspect	🇬🇧 Online Safety Act (OSA)	🇪🇺 Digital Services Act (DSA)
Scope & Focus	Narrow , detailed focus on illegal and harmful content, especially protecting children. Applies to user-to-user and search services.	Broad coverage: illegal content, IP infringement, illegal goods, dark patterns, crisis response. Applies to intermediaries.
Definition of Illegal Content	Specific categories , including "priority offences" (e.g., child sexual exploitation, terrorism). Introduction of  new offenses	Broad definition: anything illegal under EU or member state law.
Platform Obligations	Proactive : platforms must actively prevent exposure to illegal content, using algorithms/tech where feasible.	Reactive : "notice and takedown" system—platforms act when illegal content is reported.
Platform Classification	"Category 1" and "Category 2" services; Ofcom sets thresholds. No exemption for small platforms on core duties.	"VLOPs" and "VLOSEs" (45M+ users) have stricter rules; smaller platforms have lighter requirements.
Protection of Minors	Extensive, specific protections: mandatory age checks , risk assessments, detailed lists of harmful content to block from children.	Some provisions for minors, but less detailed; relies on broader EU legal framework.
Enforcement	Ofcom is regulator; powers to fine, block services, hold senior managers criminally liable.	National Digital Service Coordinators enforce; European Commission oversees VLOPs/VLOSEs.
Freedom of Expression	Requires consideration of user rights, but with more prescriptive content restrictions, especially for children.	Explicitly requires platforms to consider users' fundamental rights in moderation decisions.