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GROUP

Briefing for MPs: Petition debate on repealing the Online Safety Act - 15th December 2025

Prepared by UK civil society, digital rights, and open-knowledge organisations

Introduction

Over 550,000 people have petitioned Parliament to repeal the Online Safety Act (OSA)¹, making it one of the largest public expressions of concern about a UK digital law in recent history. A petition to reform the Act would likely have attracted even more support. While it may seem unusual for so many people to challenge a law framed around “online safety,” this briefing explains what those concerns actually are.

These concerns have hit a nerve. Parliament needs to ensure the OSA works without unfairly restricting people's day to day activities. The balance needs adjusting, and some clear changes could resolve some of the problems, and reduce the arguments for a wholesale rollback.

We highlight how the Act affects freedom of expression and access to information, and how its requirements risk undermining the ability of small, non-profit, and public-interest websites to operate. This document focuses specifically on these free-expression impacts, rather than the broader range of issues raised by the Act.

1. The Act makes it harder for not-for-profits and community groups to run websites. Many feel forced to move onto big social media platforms.

¹<https://petition.parliament.uk/petitions/722903>

The Online Safety Act imposes several dozen duties that service providers must interpret and apply

These duties are highly complex and written largely with major commercial social media platforms in mind. Yet they also extend to small businesses, community forums, charities, hobby sites, federated platforms, and public-interest resources such as Wikipedia.

While a small number of community-run or not-for-profit services may present higher risks, most are low-risk spaces. These low-risk sites are often run by volunteers who simply do not have the capacity, expertise, or resources to take on the liabilities and operational burdens created by the Act.

Many of those services - such as bulletin boards, collaborative mapmaking or collaborative encyclopedia-writing sites, are also not run or designed like the social media and filesharing services that officials had in mind when designing the duties in question.

Some services, like the LGFSS cycling forum, have managed to continue under new management. Others, such as a support project for fathers with young children, have had to abandon their independent sites and migrate onto large social media platforms.

Many small providers also struggle to engage meaningfully with Ofcom's consultations, which are extensive, technical, and time-consuming – effectively excluding the very communities the Act impacts.

Impact on Wikipedia and similar projects

Wikimedia Foundation - the charity that operates Wikipedia and a dozen other nonprofit education projects - and hundreds of allied organizations and specialists² have warned that the Act creates major burdens for public interest projects.

Wikimedia also warned that secondary legislation, passed in February 2025, added to those challenges, by exposing the most popular UK public interest projects, like Wikipedia, to "Category 1" status under the Act.

Category 1 status seems set to require moderation changes incompatible with Wikipedia's global, open, volunteer-run model, such as platform-level, globally-applied identity verification that increases costs, conflicts with privacy-by-design principles, exposes individuals around the world to major risks (such as political persecution), and is likely to require privacy-protective volunteers to lose some of their ability to

²Open call by UK civil society to exempt public interest projects from the Online Safety Bill
<https://wikimedia.org.uk/2023/06/online-safety-bill-open-letter/>

keep Wikipedia free of harmful or low-quality content.

- Wikimedia warned that these “Category 1” side-effects might theoretically only be avoidable by reducing UK participation, to disqualify Wikipedia from Category 1 status entirely.
- These harms are so substantial that the Wikimedia Foundation felt compelled to challenge the categorisation rules.³

Sites without capacity to comply are blocking the UK to avoid prosecution.

ORG’s *Blocked* project tracks sites geoblocking UK users due to OSA compliance pressures:

<https://www.blocked.org.uk/osa-blocks>

These sites are often small, low-risk, and community-driven, with no history of safety issues. Yet there is evidence the Act is forcing them to close, restrict access for UK users, or shift onto larger commercial platforms, which may be less safe. A list of affected websites is included in Appendix 1.

2. Why the Online Safety Act is resulting in the wrong types of content being taken down.

Some people have argued that platforms taking down the wrong type of content is simply them failing to implement the law correctly. However it is both the Act and Ofcom’s code of guidance that have created the following drivers for this behaviour:

Strong financial penalties. The Act allows Ofcom to fine noncompliant services up to 10 per cent of qualifying worldwide revenue or block services in the UK for serious noncompliance.⁴

Broad risk reduction duties. For user to user services likely to be accessed by children, the Act requires a suitable children’s risk assessment and ongoing measures to mitigate identified risks.⁵

Vague definitions of harmful content. The Act defers to Ofcom guidance and Codes for definitions of content harmful to children, creating uncertainty as to the precise type of content to be removed.⁶

3 Wikipedia loses challenge against Online Safety Act verification rules-
www.bbc.co.uk/news/articles/cjr1lqgvvwlo

4 Online Safety Act 2023, sch. 13, para. 4.

5 Online Safety Act 2023, Pt 3 Ch 2 ss 11–12.

6 Online Safety Act 2023, ss 60–61 (with Ofcom guidance per s. 53).

Pressure to demonstrate proactive compliance. Platforms are pressured to design, operation, and mitigation measures including automated moderation, and age-gating.

Ofcom codes recommending preemptive measures. The Protection of Children Code of Practice requires highly effective age assurance where high risk content is not prohibited for all users.⁷

Low threshold for removal. Platforms only need to reasonably suspect that content is illegal before removing it. Because the Act does not define illegal content in a way that automatically prescribes censorship, users cannot know in advance whether their content will be removed. This means removals are driven by platform discretion rather than clear legal rules, making it impossible to assess whether each removal is proportionate from a rights perspective, including freedom of expression.

Practical effects and pressures

- Platforms may delete or restrict lawful content preemptively to avoid risk.
- Political, controversial, or minority community speech may be disproportionately suppressed or age gated.
- Certain communities may face disproportionate impact if their speech is more likely to be judged risky.
- Users may adopt euphemistic or indirect language to avoid automated filters.
- Appeal and redress mechanisms may be limited. Reporting and complaints procedures exist but there is no independent body to determine if content is lawful.
- Content may be placed behind age gates incorrectly or overcautiously if risk is interpreted broadly or age assurance is uncertain.
- Online content may face stricter age restrictions than traditional media such as films or TV, as platforms must satisfy legal safety duties rather than voluntary industry ratings. For example depictions of serious violence to imaginary creatures are classified as priority content that's harmful to children (anyone aged 17 or less)⁸. And yet they could easily watch mythical creatures getting slayed on TV series / films like The Witcher (15 Rating) or the War of the Worlds (12 Rating).

⁷Ofcom, Guidance to Proactive Technology Measures (Draft, June 2025) Online Safety Act 2023, s. 231 (definition of "proactive technology") and Sch 4 para 13 (constraints on its use for analysing user-generated content).

⁸ s.62(7)(c): <https://www.legislation.gov.uk/ukpga/2023/50/section/62>

Evidence of these patterns on major platforms is provided in Appendix 2.

People are rightly angry that their Article 10 freedom of expression rights are being curtailed in the name of safety. Especially when the content they have had removed was not harmful, was lawful and when it applies to protected categories of speech involving political expression.

In addition to the freedom of expression harms, wrongful censorship and account bans or take-downs can have real economic impacts on content creators, streamers and small online businesses that rely on user-to-user services regulated by the Act for their livelihoods.

Many small providers don't have the 'clout' to get wrongfully removed content or accounts reinstated, and currently there is no third-party appeals or adjudication process that determines if content was harmful or lawful.

3. People are angry the act has caused age assurance to be applied widely to all sorts of content.

Under the Online Safety Act, platforms likely to be accessed by children must prevent them from seeing harmful content. The Act does not clearly define the type of content that should be age-gated, giving Ofcom discretion to shape interpretation and creating ambiguity for platforms. Ofcom's Protection of Children Codes explicitly require platforms that rely on age-based denial of access, in order to remain safe, to know, or make a reasonable attempt to know, whether a user is a child through age assurance, which can be age verification or age estimation⁹. Because platforms face heavy compliance costs, reputational risk, and possible penalties for noncompliance, they often apply age-gating more broadly than strictly necessary. This includes content that is legally safe for children but carries any perceived risk. As a result, even borderline or lawful content may be placed behind an age gate, creating stricter restrictions online than in other media and turning age-gating into a default safety measure rather than a targeted one.

Age-gating is now applied to a wide range of content, from literature on Substack and sexual health advice on Reddit to social gaming features on Xbox. This restricts the freedom of expression of both young people and adults who cannot pass age-assurance checks.

While some MPs may have read about a surge in VPN use to bypass age-gating, the latest evidence suggests most of this increase comes from adults (who are perhaps

⁹ Quick guide to children's access assessments - <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/quick-guide-to-childrens-access-assessments>

worried about the data protection risks) rather than children.¹⁰ On 4 December, Ofcom's Online Safety Group Director told the Today Programme that VPN use has recently fallen after an initial spike.

Teenagers aged 16 to 18 face online restrictions that are now stricter than the BBFC content classification system for film and other media. There is also evidence that young people are being blocked from accessing political news, including stories on Ukraine or Gaza.¹¹ This is particularly concerning given the Government's intention to allow 16 year olds to vote.

Without legal limits on when age-assurance technology can be used, or regulation of the technology itself, platforms and third-party vendors have economic incentives to collect more data than necessary. Implementing age-assurance at the platform level also creates a significant barrier for non-commercial websites and small services due to the associated costs. Platforms may choose cheaper and less secure vendors in countries with weaker data protection standards. Poorly implemented solutions have already caused harm, as demonstrated by a Discord data breach that exposed IDs for up to 70,000 users.¹² The ICO and current data protection regime have proven ineffective at mitigating these risks.

Conclusion

Those raising concerns about the Online Safety Act are not opposing child safety. They are asking for a law that does both: protects children and respects fundamental rights, including children's own freedom of expression rights.

The petition shows that hundreds of thousands of people feel the current Act tilts too far, creating unnecessary risks for free expression and ordinary online life. With sensible adjustments, Parliament can restore confidence that online safety and freedom of expression rights can co-exist.

¹⁰ New research from Childnet shows that the 'surge' in VPN use following the introduction of age verification in the summer is not attributable to children <https://saferinternet.org.uk/blog/new-research-from-childnet-into-vpns>

¹¹ 'Some Gaza and Ukraine posts blocked under new age checks' BBC News August 2025 - <https://www.bbc.co.uk/news/articles/cj3l0e4vr0ko>

¹² ID photos of 70,000 users may have been leaked, Discord says' -BBC News October 2025 <https://www.bbc.co.uk/news/articles/c8jmzd972leo>

Appendix 1 . Evidence of site geo-blocking. Online Safety Act freedom of expression harms.

Example images of site block pages people now face when browsing the internet.

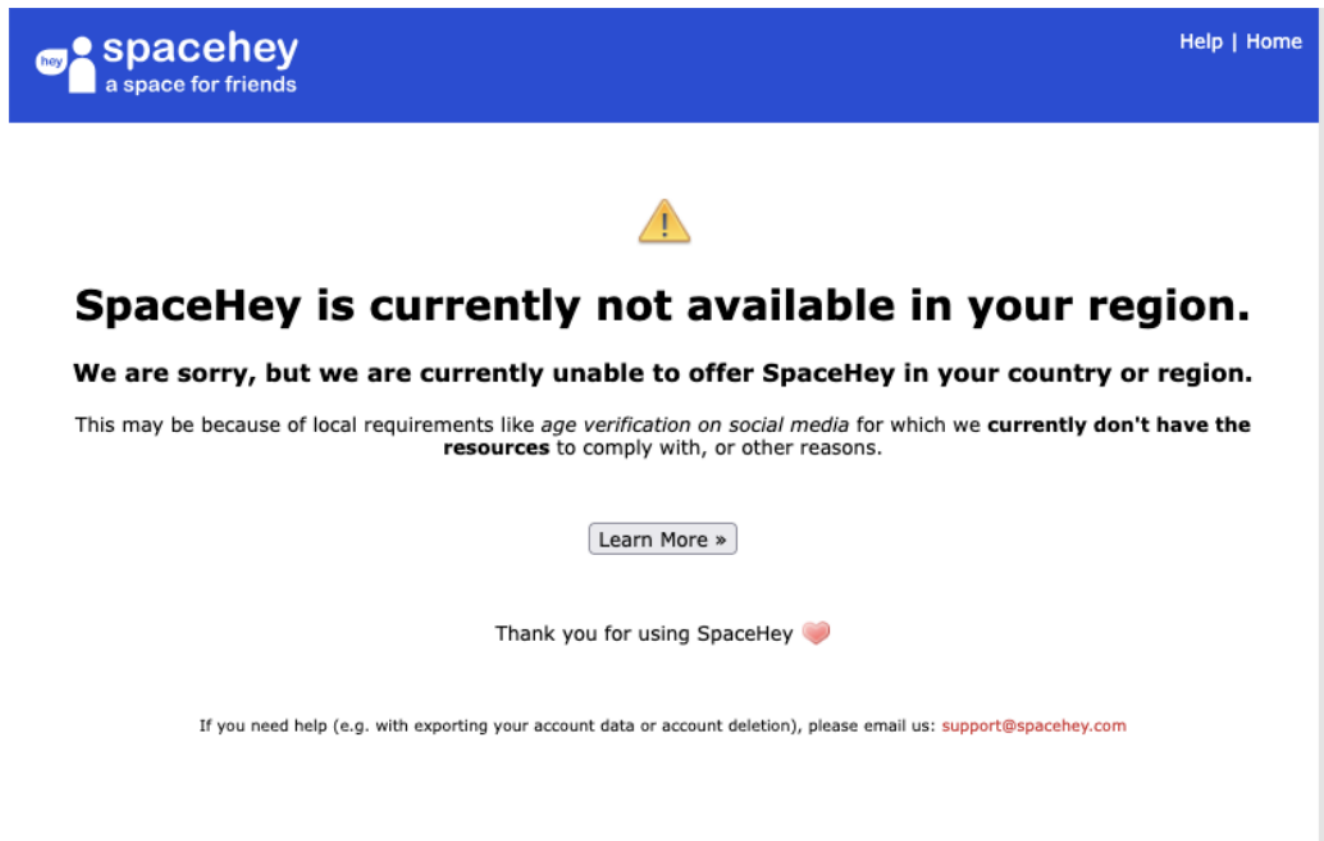


Figure 1: Spacehey blocked screen found online -<https://spacehey.com/login?return=http%3A%2F%2Fspacehey.com%2Fhome>. This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.



451 Unavailable For Legal Reasons

The UK government led by Keir Starmer, a man extremely concerned about the welfare of children, has begun to enforce the Online Safety Act. This Helen Lovejoycian piece of legislation effectively makes it impossible to operate Raddle for UK users without compromising the privacy of our users.

Thus, we have no other choice than to block visitors from the UK. We apologise for the inconvenience.

Absolutely do not use a VPN to get past this block. That would be bad. 🙄

Figure 2: Radle Me blocked screen – <https://raddle.me/>. This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.

Sites that have been forced to close, or implemented geo blocking of the UK.

This is emergent evidence. This list is not exhaustive. Blocked relies on voluntary reporting and manual confirmation. Many closures or geoblocks may never be publicly announced or reported. For many entries, we only have platform-self-reports, which may not always reference the OSA explicitly (some cite “compliance costs,” “regulation burden,” or “age-verification burden” broadly).

Site / Domain	Reported / Shutdown (or Geoblock) Date*	Description / Notes
beta.4wall.ai	Shut down 24 July 2025 (reported 22 Nov 2025)	AI-chat platform for character/roleplay – geoblocked due to OSA compliance costs. (blocked.org.uk)
jessicahelpdesk.work	Shut down 09 October 2025	A support site for trans / LGBTQIA+ community. Geoblocking cited (“due to LGBTQIA+ content”). (blocked.org.uk)
www.imgur.com	Geoblock reported 30 September 2025	Popular image-hosting site reportedly blocking UK users (effect applies to users who rely on Imgur for images). (blocked.org.uk)

Site / Domain	Reported / Shutdown (or Geoblock) Date*	Description / Notes
lgbtqia.space	Geoblock reported 05 September 2025	An LGBTQIA+ instance – reportedly blocked due to OSA compliance concerns. (blocked.org.uk)
vaultf4.com	Geoblock reported 02 September 2025	A community & server host for multiple PC video games. (blocked.org.uk)
repo.or.cz	Geoblock reported 14 August 2025 (shutdown 25 July 2025)	Open-source code repository hosting free/open-source software (e.g. TinyCC). (blocked.org.uk)
raddle.me	Shutdown 12 August 2025 (report 13 Aug 2025)	Non-profit, volunteer-run open forum / link-aggregator. Geoblocked UK users. (blocked.org.uk)
spacehey.com	Shut down 25 July 2025 (report 27 July 2025)	Social-network recreation (MySpace-style). Removed support for UK users. (blocked.org.uk)
krakenfiles.com	Geoblock 25 July 2025 (report 26 July 2025)	Cloud file hosting / sharing service. Blocked UK IPs due to OSA compliance risk. (blocked.org.uk)
urbandeadd.com	Shut down March 2025 (report 10 March 2025)	Web-based multiplayer zombie-apocalypse game. Site shut down citing OSA compliance issues. (blocked.org.uk)
forums.aura-online.co.uk	Shut down 19 March 2025 (report 06 Aug 2025)	repo.or.cz
irodoricomics.com	Independent manga / doujinshi / comics store (all-ages + adult)	Geoblocking due to OSA regulations
forum.zrythm.org	Discussion forum for music-production software community	Geoblocking / shut for UK users
aphyr.com	Independent tech blog / personal site	Geoblocking / UK-access removed due to OSA

Site / Domain	Reported / Shutdown (or Geoblock) Date*	Description / Notes
www.thegreenlivingforum.net		Forum shut due to OSA compliance duties.
www.gamingonlinux.com Linux, SteamOS, Steam Deck gaming GamingOnLinux - Forum	Was a space for people to discuss video gaming on Linux operating systems.	Web forum has shut down but main site still exists.
www.dadswithkids.co.uk Dads with Kids Forum	17 March 2025	Has had to move to a Discord server.
https://www.renaultevclub.co.uk/	Was a forum who people owned Renault electric vehicles. 24 May 2025	Website shut down due to OSA. Was a forum who people owned Renault electric vehicles.
http://forum.guitarbuilderscollective.com	Was a forum about people building guitars. 6 August 2025	Forum and site shut due to OSA. Was a forum about people building guitars.

Appendix 2

Examples of freedom of expression being restricted by the Online Safety Act

It is challenging to ascertain when the Act has directly resulted in particular content moderation decisions. Platforms have to interpret the codes and apply their own policies to try and meet their legal duties. The following is a list of examples where content has been wrongfully removed as platforms implement restrictive moderation policies following the Act's introduction.

1. "Social media companies are blocking wide-ranging content - including posts about the wars in Ukraine and Gaza - in an attempt to comply with the UK's new Online Safety Act," as reported by BBC Verify - <https://www.bbc.co.uk/news/articles/cj3l0e4vr0ko>

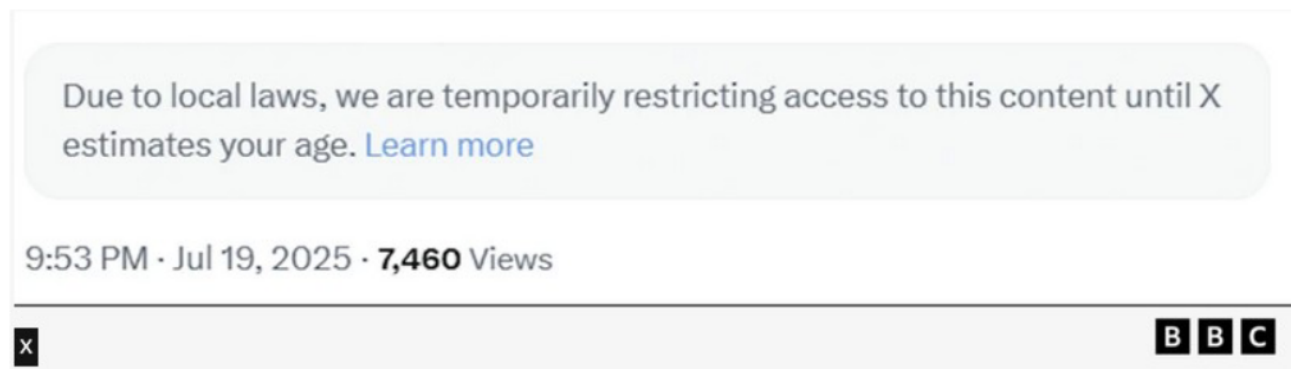


Figure 3: Screenshot of BBC verify webpage. This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.

2. A post on X that featured an image of Saturn Devouring His Son, a famed 19th century painting by Francisco de Goya, was restricted for U.K. users until their ages could be verified as reported by the BBC <https://www.bbc.co.uk/news/articles/cj3l0e4vr0ko>

3. MPs facing censorship. Neil O'Brien MP had a video about birthrates placed behind an age-gate <https://brusselssignal.eu/2025/08/pro-parenting-video-by-uk-conservative-mp-blocked-under-online-safety-act/>. Katie Lam MP had a parliamentary speech about grooming gangs put behind a filter and age gate.

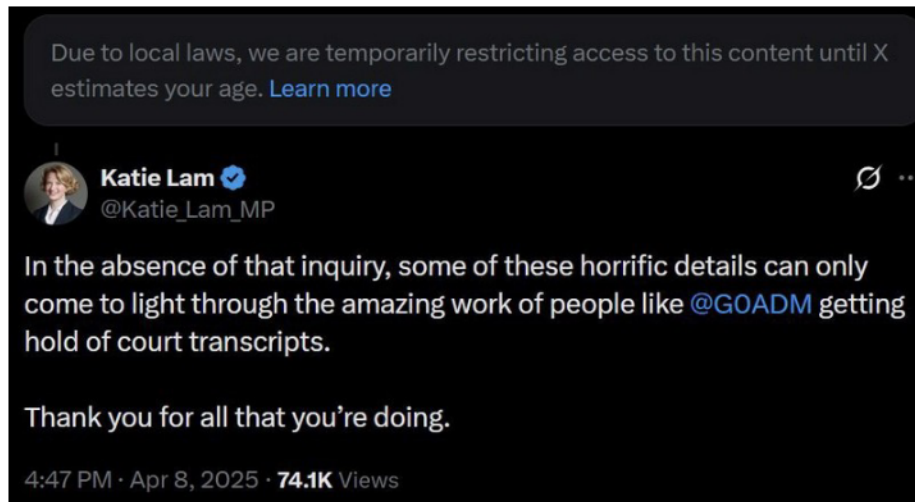
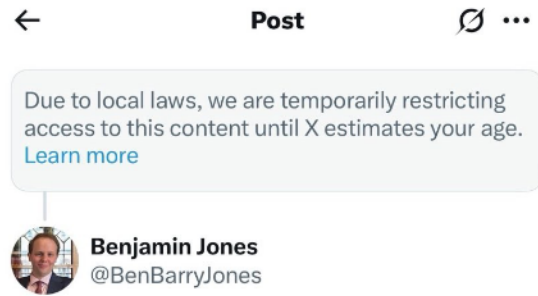


Figure 4: Screenshot of Katie Lam MP x post. This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.

4. Britain's most tattooed man can't pass age assurance tests based on facial age estimation reported by Metro- <https://metro.co.uk/2025/08/01/britains-tattooed-man-cant-watch-porn-new-rules-doesnt-recognise-face-23807955/>
5. Reddit age-gating subreddits including sexual health subreddits including r/STD, r/safesexPH and r/stopsmoking [and] news subreddits including r/Aljazeera and r/israelexposed. Reported by Taylor Lorenz and others <https://www.usermag.co/p/the-uks-censorship-catastrophe-is>
6. Video game player's ability to make new social connections restricted. Microsoft is starting to roll out age verification for Xbox. "As part of our compliance program for the UK Online Safety Act...players who indicate their account age as 18 and over, based in the UK, and signing into an Xbox experience with a Microsoft account will begin seeing notifications encouraging them to verify their age
7. Civil Society Groups including the Free Speech Union have had posts talking about the censorship blocked under the act.



2. This post from @nonregemesse about the crusades and the life of Richard the Lionheart.

(Directly below this one: x.com/nonregemesse/s...)

Figure 5: . Screen shot of Benjamin Jones twitter thread. This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.

8. Open Rights Group has had Tik Tok videos talking about the introduction of age-assurance taken down, and had to fight to get them restored.

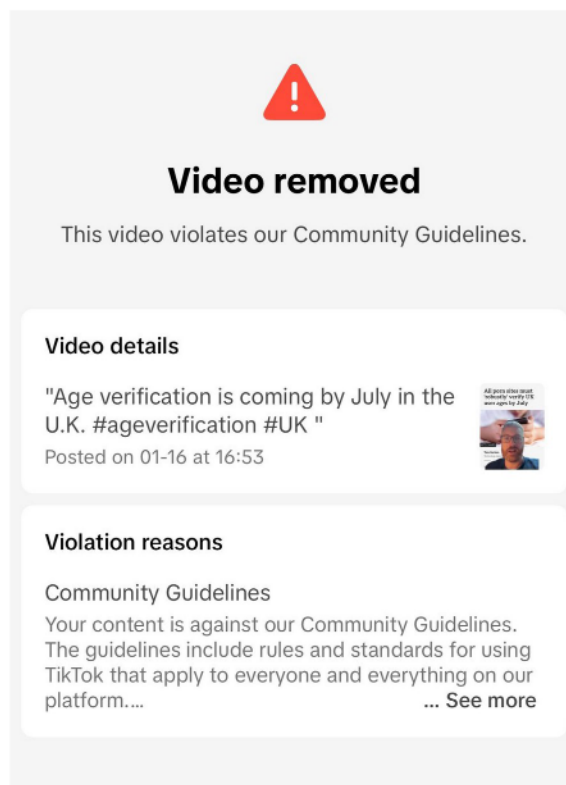


Figure 6: This screenshot is used under fair dealing/fair use for research purposes. The image rights are retained by the original owner.

9. The Palestine Action ban coupled with Online Safety Act has created 'a threat to public debate' as reported by the Guardian
<https://www.theguardian.com/world/2025/aug/02/palestine-action-ban-coupled-with-online-safety-act-are-threat-to-public-debate>
10. Heroines, not heroin: charity's Facebook page returns after AI flagged it for drugs
<https://www.theguardian.com/artanddesign/2025/nov/18/charity-facebook-page-hundred-heroines-reinstated-wrongly-flagged-drug-content>
11. The author Ben Stills had his short story censored and placed behind an age-gate on Substack. <https://www.newstatesman.com/culture/2025/12/the-online-safety-act-has-come-for-literature>

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